

**ERGEG's CONSULTATION ON THE 3rd ENERGY PACKAGE
ERDF's POSITIONS**

ERDF is the main distributor in France, distributing electricity to 33 millions customers (95% of French distribution).

ERDF supports the achievement of the internal energy market in Europe and the initiatives leading to this target, and particularly the present consultation launched by ERGEG to prepare the implementation of the 3rd package, even before its final adoption.

In this consultation, ERDF thinks that the European Distributors are not only "stakeholders" of the project, but are major players in the Internal Energy Market for its downstream part.

For this reason, ERDF proposes that the distributors are closely associated to the relevant works mentioned in the ERGEG's consultation.

.The consultation launched by ERGEG contains 4 groups of questions:

- 1- How to organise the consultations of the stakeholders by ERGEG during the interim period.
- 2- The priorities amongst the works to be done by ERGEG.
- 3- The "interactions" between the Agency and ENTSO.
- 4- The regional cooperation.

As distributor, ERDF is involved in the first 2 groups of questions.

I- How to organise the consultation of the stakeholders:

ERDF, and generally the distributors, is concerned by 2 manners:

- 1- ERDF is a network user of the transmission grid, like other stakeholders.
- 2- A distributor is a major player of the internal energy market.

- 1- The technical, economical and regulatory decisions concerning the Transmission Grids can have major consequences on the distribution side.
The distributors have to be closely associated to these kinds of decisions, to be sure that their possible consequences on the distribution have been taken into account and studied.

The future consultations by ERGEG, then by the Agency, have to be organised for this purpose.

We think that ad'hoc panels or ad'hoc working groups, with the close participation of the distributors, have to be organised and managed, independently of the several forums (Florence, Citizen Energy Forum).

- 2- Furthermore, and independently of this present consultation, we understand that the future consultations by ERGEG or the Agency could be also specifically oriented to distribution problems.

In this case, new ways of consultations should be organised, in order to associate properly the distributors, through existing bodies, or working groups representing the technical, economical or juridical competencies which will be relevant.

II- The priorities proposed by ERGEG:

ERDF underlines that the priorities proposed by ERGEG could have important consequences on the distribution, for example:

- Security and reliability rules, operational procedures in emergency cases.
- Rules for access to the grids (particularly for distributed generation, frequently managed by the distributors).
- Transparency rules.

These examples lead ERDF to propose the close association of the distributors mentioned in part I- above.