



# ETSO Comments on the EC Green Paper for a European Strategy for Sustainable, Competitive and Secure Energy

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# GENERAL COMMENTS

- Full support towards an EU energy policy
  - including all existing and future energy sources
  - taking into account the specificities of MStates and
  - the increasing dependency on external resources
- Concerns about
  - the compatibility between EU and MS legislations
  - the alignment between GP, EC sector enquiry, ERGEG and MS regional initiatives
  - the importance of MS versus EU consumers



# 1. EUROPEAN GRIDS

- TSOs already working on a close cooperation of the European grids for many years
- New priorities still unclear
  - Remove all congestions? all the time?
  - Promote sharing of generation mix within EU?
  - Promote penetration of renewables?
  - Reduce market power at MS level?
- Financing consequences need to be assessed and accepted at MS level



## 2. PRIORITY INTERCONNECTION PLAN

- ETSO urges for concrete actions
  - to promote and secure investments and
  - streamline authorisation procedures
- Still need for clarification of responsibilities
  - EU and MS should be responsible for creating the overarching legislative framework
  - Regulators should be responsible for implementing the framework
  - TSOs should be responsible for planning, coordination and realisation



## 3. EUROPEAN GRID CODE

- Useful when referring to cross-border issues still needing further development such as:
  - Market-relevant cross-border rules not yet tackled by regulation and guideline
- Duplicate work when referring to a catalogue of technical rules and standards for reliable grid operation, planning, grid access, etc. (already exist for the 4 synchronous power systems and each MS, the latter approved by the EU)



- ETSO suggests we only need one body.
- It would:
  - Work on the issues described in the regulation, the SOS Directive, on transparency and on data collection and publication;
  - Be formed by all EU TSOs;
  - Work in coordination with ERGEG;
  - Report to the EC;
  - Provide necessary data as described for the Energy Supply Observatory.



- Improvements at MS level have been mostly achieved by TSOs
- Next steps involve at least 2 MS and will require
  - all parties working towards the same EU goal
  - faster decision processes when dealing with cross-border issues
- taking into account that
  - TSOs cannot solve market issues alone and that
  - there is no perfect solution having only advantages for each MS and each consumer segment

