

EC FLORENCE ELECTRICITY FORUM

5 & 6 DECEMBER 2011

GEODE POSITION

NETWORK CODES

Network Code on Grid Connection - GEODE considers that

- The Network Code should just set minimum common standards on grid connection
 - ✓ to prevent situations that could have a negative impact on cross-border trade and on the European system operation and security
 - ✓ the subsidiarity principle should be respected
- The Network Code should not go deep into detail provisions nor go beyond cross-border issues
 - ✓ this is the case not only for Grid connection NC but for all NC
- Framework Guidelines and Network Codes should be accompanied by the relevant Impact Assessments (CBA)
 - ✓ Standards should only be changed or newly introduced if a clear socio-economic benefit can be demonstrated.
 - ✓ In general, Cost/Benefit sharing must be done between TSOs and DSOs

Network Codes drafting procedure – DSOs involvement

- DSOs have to be actively involved in the drafting process of the Network Codes, when there are provisions that directly affect distribution networks operation, including effects on distribution network customers and producers.
- It is not appropriate that only the TSOs should draft provisions on the operation of DSOs networks
 - ✓ DSOs are also responsible for the operation of the network and for assuring security of supply.
- ACER Framework Guidelines should foresee a procedure to integrate DSOs in the drafting process of the corresponding Network Code carried out by ENTSOE