

EREGG Public Consultation on Transmission Tariffication Guidelines¹

APPENDIX

Evaluation of the Comments received after the closure of the Public Consultation

18-07-2005

INTRODUCTION

This document contains the evaluation by ERGEG, of the comments received after the closure of the ERGEG public consultation² on Transmission Tariffication Guidelines.

While the ERGEG rules on public consultations do not foresee the inclusion of such comments in ERGEG's further consideration of the topic in question, ERGEG has nevertheless for the purposes of this topic evaluated such comments received. In terms of actual changes in the guidelines, those comments evaluated with "Yes", have already been received by other respondents by the end of the consultation (24th June) or at the public hearing, and have therefore been implemented in the new draft of the Transmission Tariffication Guidelines.

This document is published at the ERGEG website www.ergreg.org.

¹Transmission Tariffication Guidelines according to the Article 8 of the Regulation (EC) No 1228/2003 of the European Parliament and of the Council of 26 June 2003 on conditions for access to the network for cross-border exchanges in electricity

² Principles and rules for the ERGEG public consultations are provided at www.ergreg.org



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I-1. CEDEC				
No	Chapter / section	Comment	Include (Yes/No)	Explanation
1	Explanatory note Section 2 i	In order to give a clear signal to the market and a more rapid harmonisation among Member States it could be more simple to allocate the transmission charge on "load" rather than on "generators". In effect, all transmission costs are directly or indirectly reflected on consumers.	No	see Regulation 1228/2003
	Explanatory note Section ii	Substitute sentences "..the countries with a general surplus capacity over load will generally be low price areas.....Those with a deficit will be higher priced regions." with sentences " the countries with low generation prices will have a general surplus capacity over load.....those with higher prices will be deficit regions".	No	Effects are same when markets are considered

I-2. VDEW (Association of German Electricity Industry)				
No	Chapter / section	Comment	Include (Yes/No)	Explanation
1.	Explanatory Note	Proposal (in German) to use initial formulation "...The main components of tariffs is those related to the fixed costs of the network , ..."	No	The present formulation explains the desired statement better and more clearly.
2.	Explanatory Note	Proposal (in German) to reformulate: "... The allocation of these charges in all Member States fulfils the criteria that the majority of the charges fall on load rather than generation and <u>the major part of the electricity produced in the Internal Electricity Market is subject to a G charge regime which puts G at or very near to zero...</u> "	Yes	Already considered in other comments included.
3.	Explanatory Note Section 2 iii.	Proposal (in German) to analyze the need for harmonization later, removing the first sentence and changing: "The need for eventual harmonisation of <u>the charges in connection to these covering costs of losses and other ancillary services</u> should be investigated in detail in the future."	No	The initial formulation explains the desired statement better.