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EUGINE & Europogen response
to the joint ACER/ENTSO-E consultation
on the role of stakeholders

1. Introduction

EUGINE is the centre of knowledge for engine power plant technology and electricity market design. Its members are the leading European manufacturers of engine power plants and their key components suppliers, including alternators. They provide forward-looking technological solutions for flexible energy. Thanks to very short start-up and ramp-up times, engine power plants are an optimal solution to complement intermittent renewables.

Europogen is a cross-border organisation that brings together the national trade associations of 4 founder members to form a powerful and unified voice for the generating set industry. The founder members recognised that with major changes taking place to the makeup of the European energy infrastructure a new body capable of influencing legislation and providing representation for the generating set industry within the EU was necessary.

As EUGINE and Europogen are very much affected by the European Internal Energy Market design, they are particularly interested in the network codes drafting and

implementation processes. They have therefore prepared this common document to express their views on the role to be played by the various stakeholders in the network code implementation process.

2. The role of stakeholders

EUGINE and Europgen warmly welcome this consultation process and the project of establishing European stakeholder committees and dedicated European expert groups to involve the stakeholders affected by the network codes implementation process. To set-up “*three permanent European Stakeholder Committees, one per family of codes (Market codes, Operational codes and Connection codes)*” seems to be an appropriate way to strike a balance between large involvement and efficient implementing process.

However, EUGINE and Europgen would like to raise several questions which are still open and need to be dealt with:

Purpose: The precise purpose and remit of the committees and dedicated groups have to be specified. Exchange of ideas and best practices at all levels between different types of organisations, including DSOs and TSOs, should naturally be included in the scope. Beyond this, it is not clear to EUGINE and Europgen whether these bodies are going to have only an advisory role or may play a more concrete role in the efficient implementing process.

Amendments: It is particularly important that stakeholders may openly express their views and initiate amendments solving problems occurring in the member states. The consultation document states that European stakeholder committees “*should also periodically be used to discuss lessons learned from the implementation process and steer necessary evolution of the codes by informing the amendment process.*” These committees would become a very useful tool if they would provide the opportunity to stakeholders to directly initiate amendments.

Composition: The level of legitimacy and efficiency of the European stakeholders committees will depend a lot on the way members are selected and to what extent these bodies are representative of all the interests concerned. Therefore, it is of the utmost importance that “*key experts from industry and customer associations*” representing the “*interests of the various addressees of network codes appropriately*” are all involved in this process, as suggested in the consultation document. An open and transparent selection (or even election) process has to be set-up to ensure a fair representation.

Transparency: As these new bodies are going to work on the implementation of public policies, they should be as open and transparent as possible. A reporting process may be useful and should be considered to regularly take stock of the progress made and build a bridge towards a larger audience.

3. Next steps

After four years of network codes development process, the time of finalisation, adoption and implementation has come.

As EUGINE and Europgen are directly affected by the network code development process, they both wish to become member of each of the three European stakeholders committees and relevant dedicated experts groups to have the opportunity to valuably contribute to the successful implementation process of all network codes.