

COGEN Europe response to Joint ACER–ENTSO-E consultation on “the establishment of European Stakeholder Committees for Network Code implementation”

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COGEN Europe welcomes the opportunity to contribute to the ACER–ENTSO-E consultation and strongly supports this initiative aimed at fostering exchanges with stakeholders during the implementation of the Network Codes via the establishment of European Stakeholder Committees.

The key principles highlighted in the ACER–ENTSO-E paper – namely transparency, efficiency, sharing of expertise and collaboration with stakeholders – must underpin the drafting of any regulation and must continue during its implementation.

As the European Association for the Promotion of Cogeneration, COGEN Europe represents the interests of a wide range of CHP plant manufacturers and users. Our membership stretches from micro-CHP householders connected at DSO level through to large-scale, must-run CHP plants connected to transmission lines. CHP plants have different behaviours with regard to interaction with the grid (e.g. export vs. auto-consumption), and it is important that full consideration is given to this diversity in discussions around the implementation of the Network Codes. Having already been engaged since the start of the drafting process of the Network Code setting Requirements for all Generators (NC RfG), but also in the drafting of other NCs, COGEN Europe welcome the initiative of creating the stakeholder groups, especially those dedicated to the Market and Connection Network Codes.

COGEN Europe sees the establishment of the European Stakeholder Groups as an opportunity to discuss several topics:

- The interactions between the provisions in the Network Codes and the potential for the emergence of robust energy services markets that reward flexible and highly-efficient generation;
- aligning the Network Codes with the EED (Energy Efficiency Directive) requirements, particularly the provisions of Article 15, Paragraphs 4-6 and Annexes XI and XII, and;
- the implementation of certain provisions in the NC RfG which require monitoring, information sharing or co-ordination at the EU level, including the Emerging Technologies Classification or the derogation procedure in the NC RfG.

Regarding the structure of the European Stakeholder Committees suggested in the consultation document, COGEN Europe agrees to organising discussions around the Market, Operational and Connection Network Codes families, as long as there is some flexibility allowing broader discussions to be held across/between the different groups when necessary.

The Network Codes should be approached as "living documents" which will require revision. COGEN Europe is therefore hopeful that the stakeholder discussions will inform ACER and ENTSO-E of the effectiveness of the Network Code implementation and will generate ideas that feed into the amendment process of the European Network Codes.