

The Agency for the Cooperation of
Energy Regulators (ACER) /
The European Network of Transmission System Operators
for Electricity (ENTSO-E)

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CONSULTATION ON THE ROLE OF STAKEHOLDERS IN THE IMPLEMENTATION OF EUROPEAN NETWORK CODES

The Agency for the Cooperation of Energy Regulators (ACER) and the European Network of Transmission System Operators for Electricity (ENTSO-E) have launched a public consultation on the role of stakeholders in the implementation of network codes and related guidelines, and on the establishment of European Network Code Stakeholder Committees and Expert Groups. The consultation ends 23 January 2015. This letter contains the comments from Statkraft to this consultation.

Statkraft is Europe's largest generator of renewable energy and is the leading power company in Norway. The company owns, produces and develops hydropower, onshore and offshore wind power, gas power and district heating. Statkraft is a major player in European power trading and has 3 600 employees in more than 20 countries. Statkraft's ambition is to have an attractive long term industrial role in offshore wind, and is one of four companies developing the Dogger Bank zone in UK waters.

In general the proposed scheme looks good, however, we want to emphasise important elements below.

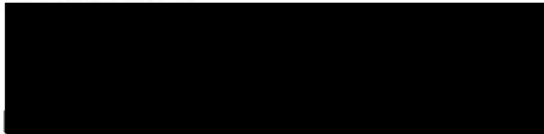
The composition of the stakeholder committees and the expert groups is of imperative importance. It must be ensured proper representation of a sufficiently wide enough range of stakeholders, taking due account of different synchronous areas and the different players within each synchronous area. In some (or all) areas it should be opened up for participation from companies too, and not only from associations. Companies can in many cases be able to provide more hands-on experience. It should be established transparent, neutral and non-discriminatory rules regarding call for representation in these committees and groups, regarding exchange/rotation of members, duration of membership, etc., and how the approval or non-approval of representation would occur.

It must further be ensured that establishment of these groups and committees do not replace public consultations and processes during national implementation of the codes. These consultations should also be taking due account of all parties with an interest, not only associations, but also relevant companies.

It should also be established (and considered put forward for consultation) rules for the committees and groups regarding public availability of minutes of meetings, decisions or recommendations from these committees and groups, etc. It is important that any decision in or recommendation from these committees and groups are based on transparent, neutral and non-discriminatory criteria.

We appreciate the effort of ACER and ENTSO-E to contribute to ensure a sound implementation of European Network Codes taking due account of all interests affected. We welcome future updates on the work regarding the implementation process and the proposed stakeholder committees and expert groups.

Yours sincerely,
for Statkraft AS



Head of Electrical Systems Wind Offshore