



Danish Ministry
of Energy, Utilities
and Climate

Danish comments on priorities for network codes and guidelines for 2019

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The Danish Government welcomes the opportunity to comment on the Commission's public consultation on priorities for network codes and guidelines for 2019 based on Article 6(1) of Regulation (EC) No 714/2009 and Regulation (EC) No 715/2009.

The Danish Government overall agrees with the Commission's priority to continue the ongoing work of implementing network codes and guidelines for 2019.

The Danish Government fully supports the recently developed and adopted network codes and guidelines on electricity and gas that in a Danish perspective include the most prioritised network codes and guidelines to support efficient markets in Europe on electricity and gas.

The process of implementing already adopted network codes and guidelines requires substantial resources from all relevant parties, including the Commission, ACER, ENTSO-E and the national regulatory authorities. The recently adopted network codes and guidelines still have to show their effect on the functioning of the internal market and Denmark agrees that this is generally not the time to develop new rules.

However, Denmark wants to mention storage (for electricity) as a topic that should be prioritized in the future, possibly already from 2019. Storage and the connected technologies (batteries, etc.) are developing at a fast pace. In order to ensure a certain level of harmonization, we find that European rules for storage would be very valuable. The RfG (Requirements for Generators) network code does not include storage (apart from pump storage). A recast of the RfG code could hence be the relevant network code to address. Given the timeline for legislative proposals and approval, it could be relevant to start this work in 2019 already.

Apart from that, the Danish Government supports the Commission's priority of resources on full implementation and enforcement of the recently developed and adopted network codes.