



Danish Ministry of Climate,  
Energy and Utilities

## Danish comments on priorities for network codes and guidelines for 2020

### Center

Centre for Global  
Climate Action

### Team

EU Green Transition

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/ NIKKO

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 59(3) of the Electricity Regulation (EU) 2019/943 and Article 6(1) of the Gas 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 2020.

The Danish Government fully supports the recently developed and adopted network codes and guidelines on electricity and gas. In a Danish perspective, they include the most important network codes and guidelines that will 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.

Denmark wants to emphasize storage (for electricity) as a topic that should be prioritized in the future given the increasing importance of e.g. batteries and other storage facilities. In order to ensure a certain level of harmonization, we find that European rules for storage would be very valuable. This would help facilitate the integration of more renewable energy while maintaining a high security of supply.

Secondly, Denmark wants to emphasize cyber security. Denmark anticipates that the integration of sustainable energy sources and the green transition will result in the actors being more reliant of *smart* solutions in the existing operational technology in systems. Therefore, there is a need that cyber security is integrated fully in the network codes and guidelines in agreement with relevant parties. Specifically Denmark emphasizes cyber security in demand response. As the latter grows more important in balancing the electricity grid, so does the need to ensure a high level of cyber security for the small digital units (e.g. IoT and IIoT) that are used to that effect. Therefore, Denmark highlight the need to coordinate the network codes and guidelines for respectively cyber security and demand response more closely.

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.