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A-PRIORITY

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Contact person: slw
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**EREGE Consultation E09-PC-45
Draft Advice on Community-wide Ten-year Electricity Network Development Plan (Ref: E09-ENM-16-03, 10 December 2009)**

Dear Mrs. Geitona,

We appreciate the efforts of EREGG in achieving a transparent European wide network planning process and take the opportunity to give below some short comments to the draft EREGG advice.

Process and planning (Question1)

Switzerland is not a member of the EU, but negotiations on a bilateral agreement aiming at integrating the electricity market are ongoing. The respective role and responsibility of the Swiss TSO (Swissgrid) and of ECom as a regulator regarding network development are defined in the Swiss legislation and are comparable with the EU legislation.

We did not find any information on how to integrate non member states in the European coordination process of network development. Switzerland is located in the heart of Europe and has strong and significant interconnections to its neighbours. As a matter of fact, coordination has therefore already been a reality for many years, and we would welcome that Switzerland be appropriately involved in the future development of the 10-YNDP and of network and generation adequacy, together with our neighbour countries and the European Union.

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Content, Criteria's and compatibility (Question 2)

We assume that national or regional economic criteria might be different within Europe. To our opinion, a regional approach for evaluation criteria is therefore adequate. Technical criteria have generally been harmonised within Europe for the AC network due to historical development, at least in the same synchronous area (technical criteria for DC connections can be different).

Regulatory opinions (Question 5)

We are not in line with the objective as specified at the beginning of chapter 7. In our understanding the objective of the 10-YNDP is to lead to a well designed power system so that demand is met efficiently and safely, as described at the end of chapter 7. This implies, among other issues, the reduction of physical congestions and efficient market integration.

Coherence of national, regional and EU wide NDP (Question 6)

According to chapter 8, ERGEG approaches the network planning from an EU-wide view that should be followed by national plans. Socioeconomic conditions differ from region to region, even sometimes within countries, and this must be considered to be sure that local needs and realities are addressed, as they might differ from a wider European vision. We therefore support the regional approach as the best able to take different conditions into consideration and to lead to realistic scenarios and planning processes.

Monitoring and implementation (Question 7)

EICom is in charge of monitoring the network development plan of the Swiss TSO. We are confident that appropriate coordination mechanisms with the NRAs of the EU will be found and would look positively at coordination also at the level of the new ACER agency.

Kind Regards

Federal Electricity Commission EICom

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