

Reaction on CEP - Distribution Systems Issues

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- **Maintain DSOs as a neutral market facilitator, with storage and EV infrastructure ownership as competitive activities:**
 - Incentives to DSOs are in the realm of the regulator (Dir. Art. 32)
 - EV charging infrastructure and storage are competitive activities; exemptions should be approved by the NRA (Dir. Arts. 33, 36)
 - The DSO must have effective decision-making rights independent from an integrated undertaking, to operate, maintain or develop the network (Dir. Art. 35)
 - Provide a general framework to cover new activities of DSOs (new Dir. Art. 36a)

- **Maintain flexible local solutions rather than network tariff harmonisation and unnecessary Network Codes**
 - No “one size fits all” on distribution tariffs: a technology’s value should be remunerated either through well-designed tariff structures or an explicit service provision; no mandatory time-differentiated network tariffs (Reg. Art. 16)
 - Topics for Network Codes should not be extended to locally-based issues as this would not be proportionate and could hinder flexibility/innovation (Reg. Art. 55)

