



Mr. Francois Lamoureux
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Dear Mr Lamoureux,

Thank you for your invitation of 8 April 2005 to EURELECTRIC and the members of EURELECTRIC to give our views on the on the developments of the electricity and gasmarkets. The Association of Danish Energy Companies (Dansk Energi) in general shares the views so well expressed in EURELECTRICs contribution sent to you by Secretary General Paul Bulteel by letter of 4 July 2005.

To continuously improve the functioning of the competitive electricity and gas market – in our view – strong and independent TSOs and Regulators who cooperate closely internationally is a prerequisite. Equally important is the enhanced harmonization of both market rules and other framework-conditions for the actors in the energy market. Present differences in methods of congestion management imply in many instances a poor utilization of the existing transmission-lines. Transparent market-oriented methods of congestion management like market-splitting and market-coupling, which reveals the costs of congestions for the market-actors, must be preferred. National differences in allocation-principles of CO₂-allowances in NAPs must come to an end as soon as possible, and the multitude of RES support systems must be harmonized, preferably by some pragmatic system of tradable guaranties of origin.

The Association of Danish Energy Companies accepts the concept of “regional markets” as a transitional phase towards one integrated EU energy market. However, harmonization within regions must be implemented with caution in order not to contribute to a point of no return in different developments among regions. We, therefore, strongly support the “EURELECTRIC Road Map to a Pan-European Market”.

Yours sincerely
Association of Danish Energy Companies

Vilhelm Mørup-Petersen
Deputy Director