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TO: European Commission

First reference: COM(2016) 863 final

Second reference: 2007/0197(COD) – European Union Agency for the Cooperation of Energy Regulators. Recast

First of all, a lot of thanks to European Commission for organising this important consultation.

This opinion represents an opinion of an individual citizen, not any legal entity.

This opinion does not contain:

- any business secrets
- any trade secrets
- any confidential information.

This opinion is public.

PDF file of this opinion can be added to a relevant web page

Annex 1 holds information about previous consultations on the European Union level.

Annex 2 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila

citizen of Finland

signed electronically

[Continues on the next page]

40

41 **Previous opinions addressed to the Agency for the Cooperation of Energy Regulators (ACER)**

42

43 ACER has organised several consultations and I have given following opinions to ACER:

44

45 EN: Opinion 34: REMIT Registration Format

46 http://www.jukkarannila.fi/lausunnot.html#nro_34

47

48 EN: Opinion 43: Publication of extracts of the European register of market participants

49 http://www.jukkarannila.fi/lausunnot.html#nro_43

50

51 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)

52 http://www.jukkarannila.fi/lausunnot.html#nro_53

53

54 EN: Opinion 55: European Energy Regulation

55 http://www.jukkarannila.fi/lausunnot.html#nro_55

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57 EN: Opinion 68: European Network Code Stakeholder Committees

58 http://www.jukkarannila.fi/lausunnot.html#nro_68

59

60 EN: Opinion 71: Common Schema for the Disclosure of Inside Information

61 http://www.jukkarannila.fi/lausunnot.html#nro_71

62

63 **Opinions – interested European Union citizen**

64

65 I have given those previous six (6) opinions as an interested European Union citizen (in Finland).

66 Those six (6) opinions are not opinions of some legal entity.

67

68 **Public ACER consultations**

69

70 ACER consultations have been very interesting. Here we can note ACER has at least tried public
71 consultations based on different issues. I propose some issues to be added to the proposed/revised
72 regulation.

73

74 **Amount of material for this consultation – 2007/0197(COD) – COM(2016) 863 final**

75

76 I collected all material (COM document and several SWD documents) based on this consultation.

77

78 86 pages → COM(2016) 863 final

79 239 pages → SWD(2016) 410 final / PART 1/5

80 118 pages → SWD(2016) 410 final / PART 2/5

81 203 pages → SWD(2016) 410 final / PART 3/5

82 92 pages → SWD(2016) 410 final / PART 4/5

83 265 pages → SWD(2016) 410 final / PART 5/5

84 3 pages → SWD(2016) 411 final

85 82 pages → SWD(2016) 412 final / PART 1/2

86 208 pages → SWD(2016) 412 final / PART 2/2

87 5 pages → SWD(2016) 413 final

88

89 **Together: 1301 pages**

90

91 Material for this consultation is very extensive and I have not read all material.

92

93 **Some humble notices based on COM(2016) 863 final**

94

95 Based on previous experiences with ACER consultations I have only some humble proposals for the
96 “Consultations and transparency” article – COM(2016) 863 final.

97

98 Article 15 ~~40~~

99 **Consultations and transparency (on pages 44-45 – COM(2016) 863 final.)**

100

101 **(new recital 5)**

102

103 **5. The Agency shall keep public information about the register of interested**
104 **stakeholders on its website. The Agency shall collect contact information to the register**
105 **based on requests of interested stakeholders.**

106

107 **(new recital 6)**

108

109 **6. The Agency shall keep an up-to-date register of stakeholders who are interested for**
110 **giving opinions based on the Agency’s proposals. The Agency shall inform registered**
111 **stakeholders based on different Agency’s proposals. The Agency shall give a reasonable**
112 **timetable for different consultations based on different Agency’s proposals.**

113

114 **(new recital 7)**

115

116 **7. The Agency shall publish results of public consultations on the Agency’s website.**

117

118 **Reasonable timetable for public consultations?**

119

120 On the other hand there could be some time limits for different public consultations – e.g. two
121 months.

122

123 **Good luck!!!**

124

125 This opinion is quite limited. Hopefully there are other constructive ideas presented in other
126 opinions. This remains to be seen.

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128 [Continues on the next page]

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ANNEX 1

My opinions to the previous and relevant consultations – there consultations were mostly organised by the Commission of the European Union. General page to all consultations – both in English and in Finnish: <http://www.jukkarannila.fi/lausunnot.html>

EN: Opinion 1: Review of the rules on access to documents
http://www.jukkarannila.fi/lausunnot.html#nro_1

EN: Opinion 2: Schools for the 21st Century
http://www.jukkarannila.fi/lausunnot.html#nro_2

EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for Safe and Innovative medicines
http://www.jukkarannila.fi/lausunnot.html#nro_3

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders
http://www.jukkarannila.fi/lausunnot.html#nro_5

EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives
http://www.jukkarannila.fi/lausunnot.html#nro_6

EN: Opinion 8: European Interoperability Framework, version 2, draft
http://www.jukkarannila.fi/lausunnot.html#nro_8

EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS proposal for comments
http://www.jukkarannila.fi/lausunnot.html#nro_9

EN: Opinion 15: Collective Redress
http://www.jukkarannila.fi/lausunnot.html#nro_15

EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530
http://www.jukkarannila.fi/lausunnot.html#nro_17

EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft
http://www.jukkarannila.fi/lausunnot.html#nro_18

EN: Opinion 19: Official Acknowledgement by the Commission
http://www.jukkarannila.fi/lausunnot.html#nro_19

- 174 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
175 http://www.jukkarannila.fi/lausunnot.html#nro_20
176
- 177 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
178 http://www.jukkarannila.fi/lausunnot.html#nro_21
179
- 180 EN: Opinion 23: Public consultation on the review of the European Standardisation System
181 http://www.jukkarannila.fi/lausunnot.html#nro_23
182
- 183 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
184 http://www.jukkarannila.fi/lausunnot.html#nro_27
185
- 186 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
187 http://www.jukkarannila.fi/lausunnot.html#nro_28
188
- 189 EN: Opinion 30: Internet Filtering
190 http://www.jukkarannila.fi/lausunnot.html#nro_30
191 NOTE: Organised by the European Committee for Standardization (CEN) ¹
192
- 193 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
194 http://www.jukkarannila.fi/lausunnot.html#nro_32
195
- 196 EN: Opinion 34: REMIT Registration Format
197 http://www.jukkarannila.fi/lausunnot.html#nro_34
198 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ²
199
- 200 EN: Opinion 35: Exploiting the employment potential of the personal and household services
201 http://www.jukkarannila.fi/lausunnot.html#nro_35
202
- 203 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
204 http://www.jukkarannila.fi/lausunnot.html#nro_37
205
- 206 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
207 http://www.jukkarannila.fi/lausunnot.html#nro_39
208
- 209 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
210 http://www.jukkarannila.fi/lausunnot.html#nro_40
211
- 212 EN: Opinion 41: AT.39398: observations on the proposed commitments
213 http://www.jukkarannila.fi/lausunnot.html#nro_41
214
- 215 EN: Opinion 42: Opening up Education
216 http://www.jukkarannila.fi/lausunnot.html#nro_42

1 <http://www.cen.eu/> (Accessed 2 July 2012)

2 <http://www.acer.europa.eu/> (Accessed 2 July 2012)

- 217
218 EN: Opinion 43: Publication of extracts of the European register of market participants
219 http://www.jukkarannila.fi/lausunnot.html#nro_43
220 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
221
222 EN: Opinion 44: Evaluation policy guidelines
223 http://www.jukkarannila.fi/lausunnot.html#nro_44
224
225 EN: Opinion 45: About ICT standardisation
226 http://www.jukkarannila.fi/lausunnot.html#nro_45
227
228 EN: Opinion 46: Review of the EU copyright rules
229 http://www.jukkarannila.fi/lausunnot.html#nro_46
230
231 EN: Opinion 51: European Area of Skills and Qualifications
232 http://www.jukkarannila.fi/lausunnot.html#nro_51
233
234 EN: Opinion 52: Trusted Cloud Europe Survey
235 http://www.jukkarannila.fi/lausunnot.html#nro_52
236
237 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
238 http://www.jukkarannila.fi/lausunnot.html#nro_53
239 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
240
241 EN: Opinion 55: European Energy Regulation
242 http://www.jukkarannila.fi/lausunnot.html#nro_55
243 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
244
245 EN: Opinion 59: Green paper on mobile Health
246 http://www.jukkarannila.fi/lausunnot.html#nro_59
247
248 EN: Opinion 60: Cross-border inheritance tax problems within the EU
249 http://www.jukkarannila.fi/lausunnot.html#nro_60
250
251 EN: Opinion 61: European Register of Products Containing Nanomaterials
252 http://www.jukkarannila.fi/lausunnot.html#nro_61
253
254 EN: Opinion 64: Corporate Social Responsibility - European Commission
255 http://www.jukkarannila.fi/lausunnot.html#nro_64
256
257 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
258 http://www.jukkarannila.fi/lausunnot.html#nro_66
259
260 [Continues on the next page]
261

- 262 EN: Opinion 68: European Network Code Stakeholder Committees
263 http://www.jukkarannila.fi/lausunnot.html#nro_68
264 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
265
266 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
267 http://www.jukkarannila.fi/lausunnot.html#nro_71
268 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
269
270 EN: Opinion 74: Enabling the Internet of Things
271 http://www.jukkarannila.fi/lausunnot.html#nro_74
272 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
273
274 EN: Opinion 80: Mandatory Transparency Register
275 http://www.jukkarannila.fi/lausunnot.html#nro_80
276
277 EN: Opinion 84: Revision of the European Interoperability Framework
278 http://www.jukkarannila.fi/lausunnot.html#nro_84
279
280 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
281 http://www.jukkarannila.fi/lausunnot.html#nro_86
282
283 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
284 http://www.jukkarannila.fi/lausunnot.html#nro_88
285
286 EN: Opinion 89: BEREC Guidelines for net neutrality rules
287 http://www.jukkarannila.fi/lausunnot.html#nro_89
288 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
289
290 EN: Opinion 93: Safety of apps and other non-embedded software
291 http://www.jukkarannila.fi/lausunnot.html#nro_93
292
293 EN: Opinion 95: Targeted consultation on eForms
294 http://www.jukkarannila.fi/lausunnot.html#nro_95
295
296 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
297 http://www.jukkarannila.fi/lausunnot.html#nro_97
298
299 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
300 http://www.jukkarannila.fi/lausunnot.html#nro_98
301
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304 My opinions to the previous and relevant consultations – there consultations were mostly organised
305 by the Commission of the European Union. General page to all consultations – both in English and
306 in Finnish: <http://www.jukkarannila.fi/lausunnot.html>

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326 worldwide politics.

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3 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenged the three-party system, since three "old" parties were not traditionally as the three largest parties. On 2015 this "new" party is part of the current Finnish Government. We all must be interested about this new development in Finland.