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Delivered to: [consultation2014O01@acer.europa.eu](mailto:consultation2014O01@acer.europa.eu)  
Agency for the Cooperation of Energy Regulators (ACER)

**Opinion: European Energy Regulation: A Bridge to 2025**

First of all, a lot of thanks to ACER of 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.

ACER can publish this opinion on a relevant web page.

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

Annex 2 holds information about disclaimers and copyright.

With kind Regards,

Jukka S. Rannila  
citizen of Finland

signed electronically

[continues on the next page]

38

**39 General: Previous consultations**

40

41 I gave earlier opinions to ACER, and PDF files of those opinions are on the following addresses:

42

43 EN: Opinion 34: REMIT Registration Format

44 [http://www.jukkarannila.fi/lausunnot.html#nro\\_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)

45

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

47 [http://www.jukkarannila.fi/lausunnot.html#nro\\_43](http://www.jukkarannila.fi/lausunnot.html#nro_43)

48

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

50 [http://www.jukkarannila.fi/lausunnot.html#nro\\_53](http://www.jukkarannila.fi/lausunnot.html#nro_53)

51

52 (REMIT: Pursuant to Article 9(3) of Regulation (EU) No 1227/2011 of the European Parliament  
53 and of the Council of 25 October 2011 on wholesale energy market integrity and transparency)

54

55 SO, in this Opinion there should be some new insights based on the European Energy Regulation  
56 (Document: PC\_2014\_O\_01) consultation document.

57

**58 Limitation: Opinion of an individual customer (citizen) – not any legal entity**

59

60 Since this opinion is an created by an individual customer (citizen), the knowledge base for this  
61 consultation is naturally rather limited, since there has not been a group of experienced experts  
62 writing this opinion.

63

**64 Complying with current technologies**

65

66 Sections 2.26-2.30 contain some critical thoughts about technological advances. At the current  
67 situation we can note, that there can be different technological developments related to energy.

68

69 Therefore it can be noted, that there has to constant follow-up of technological advances, which  
70 may require some legislative and/or governance.

71

**72 Marketing energy efficiency to customers**

73

74 There is some discussion about energy meters on the consultation document. Like said, energy  
75 meters are part of having energy efficiency and possibly energy savings.

76

77 The problem with consumer marketing is getting the message through, and marketing to different  
78 companies (and other legal entities) is easier.

79

80 In the previous consultations I have advocated creating of different figures, which give to  
81 consumers a way of assessing different products.

82

83 The next figure is based on one attempt of having a simple message, which can be used with  
84 different marketing operations.  
85



86  
87

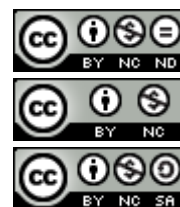
88 Another example is provided with the following figures.

89 Attribution-NonCommercial-NoDerivatives 4.0 International

90 Attribution-NonCommercial 4.0 International

91 Attribution-NonCommercial-ShareAlike 4.0 International

92



93 These licences can be chosen <sup>1</sup> with simple selections, and there are different levels for explicating  
94 the licences:

- 95 \* figures
- 96 \* simplified easy-to-read pages
- 97 \* finally the long legal text.

98

99 In previous opinions I have advocated creating simplified figures and the three-level explanations  
100 related to the application area of figures.

101

102 In previous opinions I have advocated constructing easy-to-read legal texts – may in levels.

103

104 **Proposal 1: For consumer marketing there could be different simplified figures to be**  
105 **used with consumer marketing messages.**

106

107 **Proposal 2: For consumer marketing there could be easy-to-read (e.g. in three levels)**  
108 **information related to energy usage.**

109

110 An example from <sup>2</sup> Finland is KELA's project for improving readability of different forms and  
111 texts. In other words, the complicated (legal) texts can be constructed with more simplified ways.

112

113 Like said, the consumer marketing is demanding, and marketing of energy efficiency and energy  
114 savings for customers (citizens) can take years.

115

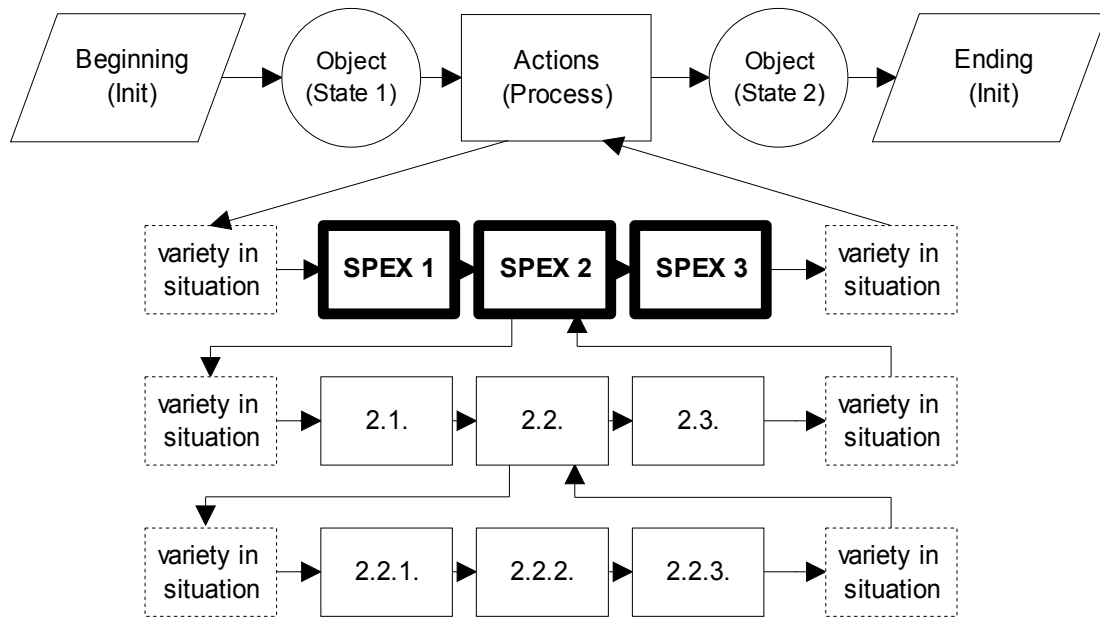
1 <http://creativecommons.org/choose/>, page for selecting a Creative Commons licence

2 [http://www.kela.fi/hankkeet\\_selkeyshanke](http://www.kela.fi/hankkeet_selkeyshanke), In Finnish: creating more readable texts for customers

116 **Standardisation of interfaces for customers (citizens)**

117

118 In previous consultations I have advocated standardisation of interfaces. There are different  
 119 processes (Beginning → Actions → Ending), which can be described in different levels of details.  
 120



121

122

123 There can be highly detailed points in different processes (SPEX), which could be standardised.

124

125 **Proposal 3: There could be a project for modelling different customer (care) processes.**

126

127 **Proposal 4: Some parts of the customer (care) processes could be standardised for**  
 128 **customer interfaces.**

129

130 **Proposal 5: Some standardised customer interfaces could be used for having better**  
 131 **customer (care) processes in the European level.**

132

133 An example could be user-friendly interface (e.g. web page and/or mobile application) for energy  
 134 consumption information, and the standardised interface could be the same for all energy providers.

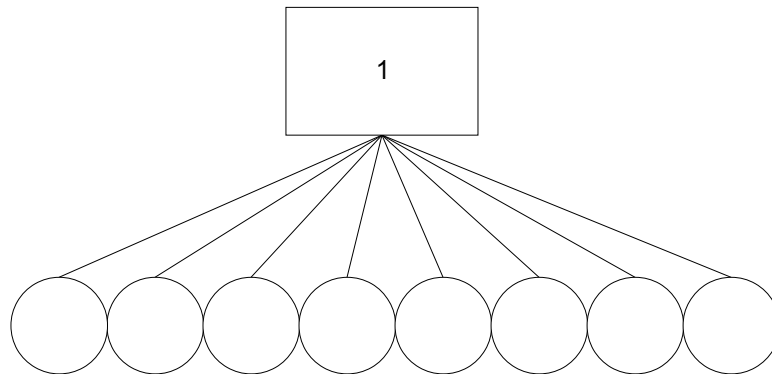
135

136 It can be noted, that different actors can naturally have other non-standardised interfaces for  
 137 customer(s) (care), and there is nothing wrong with that approach.

138

139 Also, we have to assess the need for several customer (care) interfaces. In other words, different  
 140 stakeholder groups need different interfaces, and energy (market) systems are not an exception of  
 141 this situation.

142

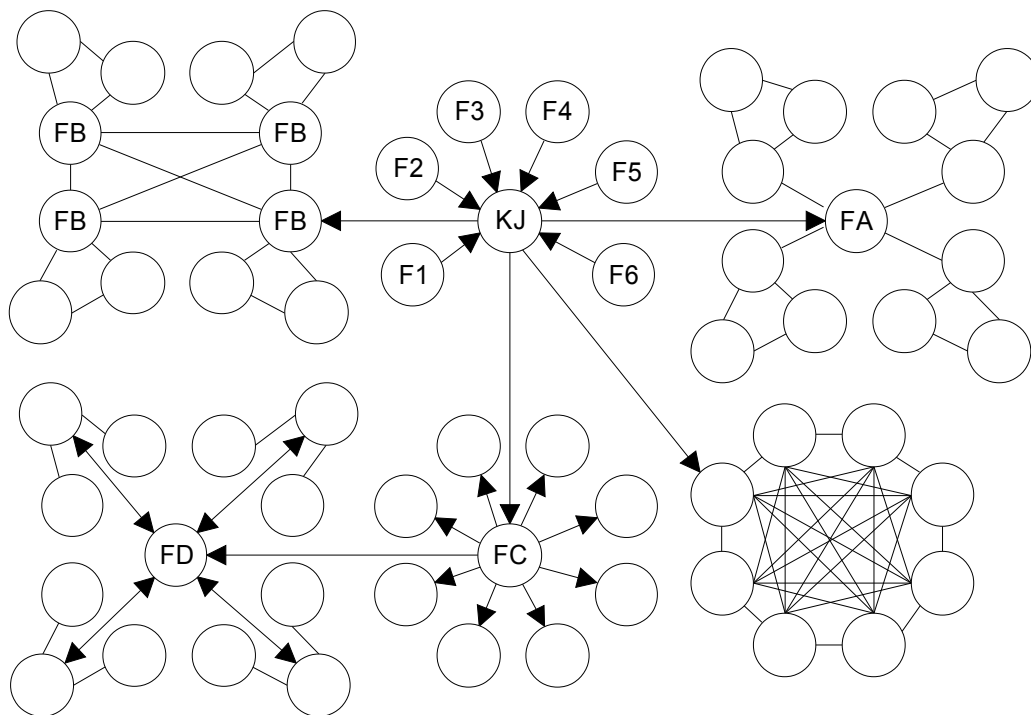


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**Proposal 6: There could be a project for analysing the quality and the quantity of different interfaces for different stakeholder groups, e.g. customer as one group.**

Naturally, there can be even tens of different user interfaces depending on the nature of different systems.

**Layered systems**



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 158

In some previous consultations I have presented the figure above. In practical reality, there are different systems, which use very different standards/formats for cooperation between different systems.

159 There are a lot of different standard setting organisations (SDO), and one comprehensive list is  
 160 provided <sup>3</sup> for us by ConsortiumInfo.org. Examples are naturally different XML documents and  
 161 CSV documents.

162

163 **Proposal 7: ACER could systematically assess existing standard setting organisations**  
 164 **(SDO) and assess standards provided by those communities.**

165

166 Like said in the previous consultations, there should not be redundant standardisation.

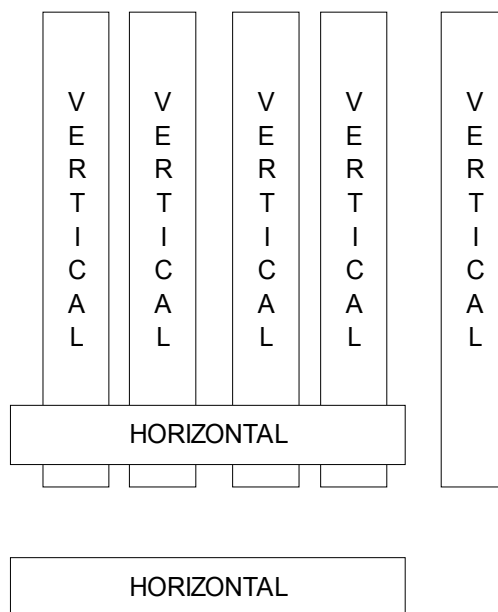
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168 **One theme: horizontal standards and vertical standards**

169

170 One of the main themes can be division standards: horizontal standards and vertical standards. What  
 171 this means? Generally speaking, different ICT solutions will implement a large collection of  
 172 different standards: open standards and closed standards. In many cases, different ICT solutions do  
 173 not work together and this might not constitute a problem. However, in many cases different ICT  
 174 solutions has to work together seamlessly – possibly without further problems.

175



176

177

178 **Proposal 8: ACER could collect all relevant information about horizontal standards.**

179

180 **Proposal 9: ACER could collect all relevant information about vertical standards.**

181

182 **Proposal 10: There could be separation of horizontal standards and vertical standards.**

183

184 It can be said, that in some point there will be need for horizontal standardisation. This means, that  
 185 several vertical systems can cooperate in different levels. The general development is, that there can

<sup>3</sup> <http://www.consortiuminfo.org/links/linksall.php>, Standard Setting Organizations and Standards List

186 be several vertical solutions for the same computerisation area. An example for this standardisation  
187 is the email standard (horizontal), when there are numerous email systems (vertical) created with  
188 very wide variety of technologies.

189

190 **Proposal 11: There could be different standardisation efforts related to horizontal**  
191 **standards and vertical standards.**

192

193 **Proposal 12: Developing horizontal standards should favoured in the development of**  
194 **new and/or revised standards.**

195

196 **Example of standards / Different information feeds**

197

198 In the previous consultations I have used RSS feeds as an example.

199



200

201

202 To be precise, there are some standards for RSS feeds: RSS 2.0<sup>4</sup> standard and Atom<sup>5 6</sup> standards.

203 There are different systems, which comply with these example standards (RSS and Atom)  
204 differently.

205

206 It can be said, that there is need for different information feeds between different systems. Like said  
207 before, ACER can assess different existing standards in order to avoid redundant (even useless)  
208 standardisation.

209

210

211 **Good luck!!!**

212

213 This opinion is quite limited. Hopefully there are constructive ideas presented in other opinions.

214 This remains to be seen.

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4 <http://www.rssboard.org/rss-specification>.

5 <http://tools.ietf.org/html/rfc4287>, The Atom Syndication Format

6 <http://tools.ietf.org/html/rfc5023>, The Atom Publishing Protocol

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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](http://www.jukkarannila.fi/lausunnot.html#nro_1)

EN: Opinion 2: Schools for the 21st Century

[http://www.jukkarannila.fi/lausunnot.html#nro\\_2](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](http://www.jukkarannila.fi/lausunnot.html#nro_3)

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

[http://www.jukkarannila.fi/lausunnot.html#nro\\_5](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](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](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](http://www.jukkarannila.fi/lausunnot.html#nro_9)

EN: Opinion 15: Collective Redress

[http://www.jukkarannila.fi/lausunnot.html#nro\\_15](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](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](http://www.jukkarannila.fi/lausunnot.html#nro_18)

EN: Opinion 19: Official Acknowledgement by the Commission

[http://www.jukkarannila.fi/lausunnot.html#nro\\_19](http://www.jukkarannila.fi/lausunnot.html#nro_19)



- 260 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft  
261 [http://www.jukkarannila.fi/lausunnot.html#nro\\_20](http://www.jukkarannila.fi/lausunnot.html#nro_20)  
262
- 263 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal  
264 [http://www.jukkarannila.fi/lausunnot.html#nro\\_21](http://www.jukkarannila.fi/lausunnot.html#nro_21)  
265
- 266 EN: Opinion 23: Public consultation on the review of the European Standardisation System  
267 [http://www.jukkarannila.fi/lausunnot.html#nro\\_23](http://www.jukkarannila.fi/lausunnot.html#nro_23)  
268
- 269 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy  
270 [http://www.jukkarannila.fi/lausunnot.html#nro\\_27](http://www.jukkarannila.fi/lausunnot.html#nro_27)  
271
- 272 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative  
273 [http://www.jukkarannila.fi/lausunnot.html#nro\\_28](http://www.jukkarannila.fi/lausunnot.html#nro_28)  
274
- 275 EN: Opinion 30: Internet Filtering  
276 [http://www.jukkarannila.fi/lausunnot.html#nro\\_30](http://www.jukkarannila.fi/lausunnot.html#nro_30)  
277 NOTE: Organised by the European Committee for Standardization (CEN) <sup>7</sup>  
278
- 279 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services  
280 [http://www.jukkarannila.fi/lausunnot.html#nro\\_32](http://www.jukkarannila.fi/lausunnot.html#nro_32)  
281
- 282 EN: Opinion 34: REMIT Registration Format  
283 [http://www.jukkarannila.fi/lausunnot.html#nro\\_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)  
284 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) <sup>8</sup>  
285
- 286 EN: Opinion 35: Exploiting the employment potential of the personal and household services  
287 [http://www.jukkarannila.fi/lausunnot.html#nro\\_35](http://www.jukkarannila.fi/lausunnot.html#nro_35)  
288
- 289 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes  
290 [http://www.jukkarannila.fi/lausunnot.html#nro\\_37](http://www.jukkarannila.fi/lausunnot.html#nro_37)  
291
- 292 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems  
293 [http://www.jukkarannila.fi/lausunnot.html#nro\\_39](http://www.jukkarannila.fi/lausunnot.html#nro_39)  
294
- 295 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies  
296 [http://www.jukkarannila.fi/lausunnot.html#nro\\_40](http://www.jukkarannila.fi/lausunnot.html#nro_40)  
297
- 298 EN: Opinion 41: AT.39398: observations on the proposed commitments  
299 [http://www.jukkarannila.fi/lausunnot.html#nro\\_41](http://www.jukkarannila.fi/lausunnot.html#nro_41)  
300
- 301 EN: Opinion 42: Opening up Education  
302 [http://www.jukkarannila.fi/lausunnot.html#nro\\_42](http://www.jukkarannila.fi/lausunnot.html#nro_42)

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

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

303

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

305 [http://www.jukkarannila.fi/lausunnot.html#nro\\_43](http://www.jukkarannila.fi/lausunnot.html#nro_43)

306 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

307

308 EN: Opinion 44: Evaluation policy guidelines

309 [http://www.jukkarannila.fi/lausunnot.html#nro\\_44](http://www.jukkarannila.fi/lausunnot.html#nro_44)

310

311 EN: Opinion 45: About ICT standardisation

312 [http://www.jukkarannila.fi/lausunnot.html#nro\\_45](http://www.jukkarannila.fi/lausunnot.html#nro_45)

313

314 EN: Opinion 46: Review of the EU copyright rules

315 [http://www.jukkarannila.fi/lausunnot.html#nro\\_46](http://www.jukkarannila.fi/lausunnot.html#nro_46)

316

317 EN: Opinion 51: European Area of Skills and Qualifications

318 [http://www.jukkarannila.fi/lausunnot.html#nro\\_51](http://www.jukkarannila.fi/lausunnot.html#nro_51)

319

320 EN: Opinion 52: Trusted Cloud Europe Survey

321 [http://www.jukkarannila.fi/lausunnot.html#nro\\_52](http://www.jukkarannila.fi/lausunnot.html#nro_52)

322

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

324 [http://www.jukkarannila.fi/lausunnot.html#nro\\_53](http://www.jukkarannila.fi/lausunnot.html#nro_53)

325 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

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328 by the Commission of the European Union. General page to all consultations – both in English and

329 in Finnish: <http://www.jukkarannila.fi/lausunnot.html>

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333 [Continues on the next page]

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**ANNEX 2**

337 DISCLAIMERS

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339 Legal disclaimer:

340 All opinions in this opinion paper are personal opinions and they do not represent opinions of any legal entity I am  
341 member either by law or voluntarily. This opinion paper is only intended to trigger thinking and it is not legal advice.

342 This opinion paper does not apply to any past, current or future legal entity. This opinion paper will not cover any of the  
343 future changes in this fast-developing area. Any actions made based on this opinion is solely responsibility of respective  
344 actor making those actions.

345

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349 entity making law proposals.

350

351 These opinions are not meant to be extreme-right, moderate-right, extreme-centre<sup>9</sup>, moderate-centre, extreme-left or  
352 moderate-left. They are only opinions of an individual whose overall thinking might or might not contain elements of  
353 different sources. These opinions do not reflect past, current or future political situation in the Finnish, European or  
354 worldwide politics.

355

356 These opinions are not meant to rally for a candidacy in any public election in any level.

357

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370 COPYRIGHT

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375 <http://creativecommons.org/licenses/by-nc-nd/4.0/>

376 The English explanation is on the following web page:

377 <http://creativecommons.org/licenses/by-nc-nd/4.0/legalcode>

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9 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenge the three-party system, since three "old" parties were not traditionally as the three largest parties. The is now a "new" party as the third largest party. We all must remain being interested about this new development in Finland.