



Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

Swiss Federal Electricity Commission ElCom

and

Swiss Federal Office of Energy (SFOE)
Energy Economy Division

CH-3003 Bern

Bern, 23 November 2012

Consultation on the issue of an electricity exchange regarding a possible market coupling

Dear Sir or Madam,

In the context of the Third Energy Package, the European Union aims at the creation of a Europe-wide electricity market. Together with the harmonization of long-term markets (forward markets), a EU-wide market coupling in the short-term market (Day-ahead and Intraday) is aimed. Regional market coupling in the day-ahead market is currently being introduced or has already been adopted between different countries. From a Swiss perspective, the question arises how a coupling of Switzerland in these new structures could take place. One condition for a Swiss participation in market coupling is the existence of a designated trading platform, i.e. a power exchange. The Swiss Federal Electricity Commission (ElCom) and the Swiss Federal Office of Energy (SFOE) have decided to conduct a joint consultation concerning the question of a trading platform. The consultation is informal and aims a better identification of the needs of the involved stakeholders.

The consultation is carried from ElCom's point of view in the legal context of surveillance and compliance with the regulations in the Swiss Federal Electricity Supply Act (Art. 22 para. 1 ESA). The SFOE is responsible for the preparation of the decision basis for adjustments of the legal framework.

We do indeed consider the organization of an electricity exchange basically as a matter of the power supply industry. The framework conditions for such an exchange however depend on the legal conditions enforced by the regulatory authorities and on possible specifications from the legislator. These requirements and the framework are currently being extensively reviewed in Switzerland by the SFOE in the light of the changes in the European Union caused by the Third Energy Package and the ongoing changes in the energy industry.

Swiss Federal Electricity Commission ElCom
Effingerstrasse 39, CH-3003 Bern
Phone +41 31 322 58 33, Fax +41 31 322 02 22
info@elcom.admin.ch
www.elcom.admin.ch

Swiss Federal Office of Energy (SFOE)
Mühlestrasse 4, CH-3063 Ittigen
Phone +41 31 322 56 11, Fax +41 31 323 25 00
contact@bfe.admin.ch
www.bfe.admin.ch



Based on the current legislation ElCom may regulate the procedure for capacity allocations in the cross-border transmission network according to article 17 paragraph 1 ESA. For ElCom two basic options are notably in the foreground: on the one hand a Swiss electricity exchange that handles the local exchange functions with a Swiss legal entity. On the other hand a contractual solution in which the exchange functions are performed by an external, possibly a foreign service provider. Also the latter option requires an entity in Switzerland. To ensure effective legal surveillance¹ in both options data sovereignty has to be guaranteed with a server in Switzerland. In addition we would like to learn with this consultation, whether in addition to the two options described above, you would see or welcome other options for a power exchange.

You will find a questionnaire attached to this letter. We kindly request you to return it until **14 December 2012**. You may download the electronic version of the questionnaire from the websites of ElCom or SFOE and send it by e-mail to the contact persons mentioned below.

Thank you in advance for your participation.

Yours sincerely,

ElCom

SFOE

Renato Tami
Director

Pascal Previdoli
Deputy Director

Contact persons:

ElCom: Mrs. Cornelia Kawann, cornelia.kawann@elcom.admin.ch; Tel. 0041 31 322 57 24 or
Mr. Stefan Renfer, stefan.renfer@elcom.admin.ch; Tel: 0041 31 325 38 25
BFE: Mr. Walter Schlegel, walter.schlegel@bfe.admin.ch; Tel. 0041 31 322 51 93 or
Mr. Aurelio Fetz, aurelio.fetz@bfe.admin.ch; Tel. 0041 31 322 56 66

Annexe:
Questionnaire
List of addresses

¹ Currently also subject of the ongoing examination of the legal framework

Unternehmen	Land
A2A Trading Srl	Italia
Alpiq AG	Schweiz
Alpiq Suisse SA	Schweiz
Avenis SA	Schweiz
Axpo Power AG	Schweiz
Axpo Trading AG	Schweiz
Azienda Elettrica Ticinese	Schweiz
Azienda Elettrica Ticinese Italia S.p.A.	Italia
Azienda Energetica Trading S.r.l.	Italia
Becomac GmbH	Deutschland
BKW AG	Schweiz
Budapest Energy Trading Ltd	Hungary
Burgo Energia S.r.l.	Italia
Cimo Compagnie industrielle de Monthey SA	Schweiz
CKW Grid AG	Schweiz
Compagnie Nationale du Rhône	France
Danske Commodities	Denmark
Deutsche Bank AG	United Kingdom
Deutsche Bank AG London	United Kingdom
DufEnergy Trading SA	Schweiz
Dynamic Energy ApS	Denmark
E.ON SE	Deutschland
EBM	Schweiz
EDELWEISS ENERGIA S.p.A.	Italia
Edison Trading S.p.A.	Italia
Efforte AG	Schweiz
EKT AG	Schweiz
Electra Commodities SA	Schweiz
Electrabel SA	Belgien
Electrade S.p.A.	Italia
Elektrizitätswerk der Stadt Zürich	Schweiz
EN.E.R. Trading spa	Italia
EnBW Trading GmbH	Deutschland
Eneco Energy Trade B.V.	Netherlands
Eneco Trade S.r.l.	Italia
Enel Trade S.p.A.	Italia
enera ag	Schweiz
Enercontract AG	Schweiz
Energetic Source S.p.A.	Italia
Energi Danmark A/S	Danmark
Energie Pool Schweiz AG	Schweiz
Energie Wasser Bern	Schweiz
Energieallianz Austria GmbH	Österreich
Energiedienst Holding AG	Schweiz
Enérgya VM Gestión de Energía S.L.U.	Spain
ENI S.p.A.	Italia
ENOI S.p.A.	Italia
European Commodity Clearing Luxembourg S.à.r.l.	Luxembourg
ewz Elektrizitätswerke der Stadt Zürich	Schweiz
EXEN s.r.o.	Czech Republic
Exergia S.p.A.	Italia
Ezpada AG	Schweiz
FMV SA	Schweiz
GALA S.p.A.	Italia
GAZPROM MARKETING & TRADING LTD	United Kingdom
GDF SUEZ Trading	France
GETEC Energie AG	Deutschland
Groupe E SA	Schweiz
Gruppe Grosser Stromkunden	Schweiz
Gunvor International B.V., Amsterdam, succursale de Genève	Schweiz
HB Trading SpA	Italia
Hera Trading S.r.l.	Italia
Holding Slovenske elektrarne d.o.o.	Slowenien
IBERDROLA GENERACION S.A.U.	Spain
IWB Industrielle Werke Basel	Schweiz
Josef C. Neckermann GmbH & Co. KG	Deutschland

Unternehmen	Land
KELAG-Kärntner Elektrizitäts-Aktiengesellschaft	Österreich
Liechtensteinische Kraftwerke	Liechtenstein
Markedskraft Deutschland GmbH	Deutschland
Mercuria Energy Trading SA	Schweiz
Merill Lynch Commodities (Europe) Limited	United Kingdom
Morgan Stanley Capital Group Inc.	United Kingdom
Multiutility S.P.A.	Italia
NORDENERGIA	Italia
Nordjysk Elhandel A/S	Denmark
OMPEX AG	Schweiz
Repower AG	Schweiz
RWE Supply & Trading GmbH	Deutschland
Salzburg AG für Energie, Verkehr und Telekommunikation	Österreich
Schweizerische Bundesbahnen SBB	Schweiz
Service Industriels de Genève SIG	Schweiz
Shell U.K. Limited	United Kingdom
Società Consortile Energia Toscana	Italia
Sorgenia SpA	Italia
Statkraft Markets GmbH	Deutschland
Swisscom Energy Solutions AG	Schweiz
Swissgrid AG	Schweiz
Swisspower Energy AG	Schweiz
TEI SPA	Italia
TIWAG-Tiroler Wasserkraft AG	Österreich
Transohm AG	Schweiz
Trianel GmbH	Deutschland
Vattenfall Energy Trading GmbH	Deutschland
Verband Schweizerischer Elektrizitätsunternehmen	Schweiz
VERBUND AG	Österreich
Vitol SA	Schweiz
Volkswagen AG	Deutschland
Vorarlberger Kraftwerke AG	Österreich
WORLDENERGY SA	Schweiz
WWZ Energie AG	Schweiz