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2 **TO: European Commission**3 **TO: Directorate-General for Energy (DG Energy)**

4

5 **Reference: 2016/0375 (COD) – COM(2016) 759 final**6 **Proposal for Governance of the Energy Union**7 [http://eur-lex.europa.eu/procedure/EN/2016\\_375](http://eur-lex.europa.eu/procedure/EN/2016_375)8 [http://www.europarl.europa.eu/oeil/popups/ficheprocedure.do?](http://www.europarl.europa.eu/oeil/popups/ficheprocedure.do?lang=en&reference=2016/0375(OLP))9 [lang=en&reference=2016/0375\(OLP\)](http://www.europarl.europa.eu/oeil/popups/ficheprocedure.do?lang=en&reference=2016/0375(OLP))

10

11 First of all, a lot of thanks to Directorate-General for Energy (DG Energy) for organising this  
12 important consultation.

13

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

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16 This opinion does not contain:

17 – any business secrets

18 – any trade secrets

19 – any confidential information.

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21 This opinion is public.

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

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

25 Annex 2 holds information about disclaimers and copyright.

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29 Best Regards,

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33 Jukka S. Rannila

34 citizen of Finland

35

36 signed electronically

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39 [Continues on the next page]

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42 **Some notes for articles 10 and 24**

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44 I have notes just for articles 10 and 24.

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47 **Article 10 – Public consultation**

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49 Here I propose following additions to article 10:

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51 **1. Member states shall keep a up-to-date national register of interested stakeholders**  
52 **who are willing to give comments based on different consultations.**

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54 **2. Member states shall inform interested stakeholders (based on information in**  
55 **national register) about different consultations.**

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57 **3. Member states shall publish results of different consultations.**

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60 **Article 24 – E-reporting platform**

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62 Here I propose following additions to article 24:

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64 **3. Established online reporting platform shall contain national registers of interested**  
65 **stakeholders.**

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67 **4. Member states shall add information about interested stakeholders to national**  
68 **register in the online reporting platform.**

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70 **5. Results of different consultations (member state consultations) shall be published in**  
71 **the online reporting platform.**

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75 **Good luck!!!**

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

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81 [Continues on the next page]

**ANNEX 1**

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My opinions to the previous and relevant consultations – there consultations were mostly organised by the European Commission.

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)

EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft

[http://www.jukkarannila.fi/lausunnot.html#nro\\_20](http://www.jukkarannila.fi/lausunnot.html#nro_20)

EN: Opinion 21: Opinion about the European Interoperability Strategy proposal

[http://www.jukkarannila.fi/lausunnot.html#nro\\_21](http://www.jukkarannila.fi/lausunnot.html#nro_21)

- 127 EN: Opinion 23: Public consultation on the review of the European Standardisation System  
128 [http://www.jukkarannila.fi/lausunnot.html#nro\\_23](http://www.jukkarannila.fi/lausunnot.html#nro_23)  
129
- 130 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy  
131 [http://www.jukkarannila.fi/lausunnot.html#nro\\_27](http://www.jukkarannila.fi/lausunnot.html#nro_27)  
132
- 133 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative  
134 [http://www.jukkarannila.fi/lausunnot.html#nro\\_28](http://www.jukkarannila.fi/lausunnot.html#nro_28)  
135
- 136 EN: Opinion 30: Internet Filtering  
137 [http://www.jukkarannila.fi/lausunnot.html#nro\\_30](http://www.jukkarannila.fi/lausunnot.html#nro_30)  
138 NOTE: Organised by the European Committee for Standardization (CEN) <sup>1</sup>  
139
- 140 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services  
141 [http://www.jukkarannila.fi/lausunnot.html#nro\\_32](http://www.jukkarannila.fi/lausunnot.html#nro_32)  
142
- 143 EN: Opinion 34: REMIT Registration Format  
144 [http://www.jukkarannila.fi/lausunnot.html#nro\\_34](http://www.jukkarannila.fi/lausunnot.html#nro_34)  
145 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) <sup>2</sup>  
146
- 147 EN: Opinion 35: Exploiting the employment potential of the personal and household services  
148 [http://www.jukkarannila.fi/lausunnot.html#nro\\_35](http://www.jukkarannila.fi/lausunnot.html#nro_35)  
149
- 150 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes  
151 [http://www.jukkarannila.fi/lausunnot.html#nro\\_37](http://www.jukkarannila.fi/lausunnot.html#nro_37)  
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- 153 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems  
154 [http://www.jukkarannila.fi/lausunnot.html#nro\\_39](http://www.jukkarannila.fi/lausunnot.html#nro_39)  
155
- 156 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies  
157 [http://www.jukkarannila.fi/lausunnot.html#nro\\_40](http://www.jukkarannila.fi/lausunnot.html#nro_40)  
158
- 159 EN: Opinion 41: AT.39398: observations on the proposed commitments  
160 [http://www.jukkarannila.fi/lausunnot.html#nro\\_41](http://www.jukkarannila.fi/lausunnot.html#nro_41)  
161
- 162 EN: Opinion 42: Opening up Education  
163 [http://www.jukkarannila.fi/lausunnot.html#nro\\_42](http://www.jukkarannila.fi/lausunnot.html#nro_42)  
164
- 165 EN: Opinion 43: Publication of extracts of the European register of market participants  
166 [http://www.jukkarannila.fi/lausunnot.html#nro\\_43](http://www.jukkarannila.fi/lausunnot.html#nro_43)  
167 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
168  
169

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

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

- 170 EN: Opinion 44: Evaluation policy guidelines  
171 [http://www.jukkarannila.fi/lausunnot.html#nro\\_44](http://www.jukkarannila.fi/lausunnot.html#nro_44)  
172
- 173 EN: Opinion 45: About ICT standardisation  
174 [http://www.jukkarannila.fi/lausunnot.html#nro\\_45](http://www.jukkarannila.fi/lausunnot.html#nro_45)  
175
- 176 EN: Opinion 46: Review of the EU copyright rules  
177 [http://www.jukkarannila.fi/lausunnot.html#nro\\_46](http://www.jukkarannila.fi/lausunnot.html#nro_46)  
178
- 179 EN: Opinion 51: European Area of Skills and Qualifications  
180 [http://www.jukkarannila.fi/lausunnot.html#nro\\_51](http://www.jukkarannila.fi/lausunnot.html#nro_51)  
181
- 182 EN: Opinion 52: Trusted Cloud Europe Survey  
183 [http://www.jukkarannila.fi/lausunnot.html#nro\\_52](http://www.jukkarannila.fi/lausunnot.html#nro_52)  
184
- 185 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)  
186 [http://www.jukkarannila.fi/lausunnot.html#nro\\_53](http://www.jukkarannila.fi/lausunnot.html#nro_53)  
187 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
188
- 189 EN: Opinion 55: European Energy Regulation  
190 [http://www.jukkarannila.fi/lausunnot.html#nro\\_55](http://www.jukkarannila.fi/lausunnot.html#nro_55)  
191 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
192
- 193 EN: Opinion 59: Green paper on mobile Health  
194 [http://www.jukkarannila.fi/lausunnot.html#nro\\_59](http://www.jukkarannila.fi/lausunnot.html#nro_59)  
195
- 196 EN: Opinion 60: Cross-border inheritance tax problems within the EU  
197 [http://www.jukkarannila.fi/lausunnot.html#nro\\_60](http://www.jukkarannila.fi/lausunnot.html#nro_60)  
198
- 199 EN: Opinion 61: European Register of Products Containing Nanomaterials  
200 [http://www.jukkarannila.fi/lausunnot.html#nro\\_61](http://www.jukkarannila.fi/lausunnot.html#nro_61)  
201
- 202 EN: Opinion 64: Corporate Social Responsibility - European Commission  
203 [http://www.jukkarannila.fi/lausunnot.html#nro\\_64](http://www.jukkarannila.fi/lausunnot.html#nro_64)  
204
- 205 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017  
206 [http://www.jukkarannila.fi/lausunnot.html#nro\\_66](http://www.jukkarannila.fi/lausunnot.html#nro_66)  
207
- 208 EN: Opinion 68: European Network Code Stakeholder Committees  
209 [http://www.jukkarannila.fi/lausunnot.html#nro\\_68](http://www.jukkarannila.fi/lausunnot.html#nro_68)  
210 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)  
211
- 212 EN: Opinion 71: Common Schema for the Disclosure of Inside Information  
213 [http://www.jukkarannila.fi/lausunnot.html#nro\\_71](http://www.jukkarannila.fi/lausunnot.html#nro_71)  
214 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

- 215 EN: Opinion 74: Enabling the Internet of Things  
216 [http://www.jukkarannila.fi/lausunnot.html#nro\\_74](http://www.jukkarannila.fi/lausunnot.html#nro_74)  
217 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)  
218  
219 EN: Opinion 80: Mandatory Transparency Register  
220 [http://www.jukkarannila.fi/lausunnot.html#nro\\_80](http://www.jukkarannila.fi/lausunnot.html#nro_80)  
221  
222 EN: Opinion 84: Revision of the European Interoperability Framework  
223 [http://www.jukkarannila.fi/lausunnot.html#nro\\_84](http://www.jukkarannila.fi/lausunnot.html#nro_84)  
224  
225 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights  
226 [http://www.jukkarannila.fi/lausunnot.html#nro\\_86](http://www.jukkarannila.fi/lausunnot.html#nro_86)  
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228 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive  
229 [http://www.jukkarannila.fi/lausunnot.html#nro\\_88](http://www.jukkarannila.fi/lausunnot.html#nro_88)  
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231 EN: Opinion 89: BEREC Guidelines for net neutrality rules  
232 [http://www.jukkarannila.fi/lausunnot.html#nro\\_89](http://www.jukkarannila.fi/lausunnot.html#nro_89)  
233 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)  
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235 EN: Opinion 93: Safety of apps and other non-embedded software  
236 [http://www.jukkarannila.fi/lausunnot.html#nro\\_93](http://www.jukkarannila.fi/lausunnot.html#nro_93)  
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238 EN: Opinion 95: Targeted consultation on eForms  
239 [http://www.jukkarannila.fi/lausunnot.html#nro\\_95](http://www.jukkarannila.fi/lausunnot.html#nro_95)  
240  
241 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)  
242 [http://www.jukkarannila.fi/lausunnot.html#nro\\_97](http://www.jukkarannila.fi/lausunnot.html#nro_97)  
243  
244 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals  
245 [http://www.jukkarannila.fi/lausunnot.html#nro\\_98](http://www.jukkarannila.fi/lausunnot.html#nro_98)  
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247 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy  
248 Regulators. Recast  
249 [http://www.jukkarannila.fi/lausunnot.html#nro\\_99](http://www.jukkarannila.fi/lausunnot.html#nro_99)  
250  
251 EN: Opinion 100: Protection of personal data (EU)  
252 [http://www.jukkarannila.fi/lausunnot.html#nro\\_100](http://www.jukkarannila.fi/lausunnot.html#nro_100)  
253  
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257 My opinions to the previous and relevant consultations – there consultations were mostly organised  
258 by the European Commission. General page to all consultations – both in English and in Finnish:  
259 <http://www.jukkarannila.fi/lausunnot.html>

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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.