

EFRAG  
35 Square de Meeus  
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Belgium

By e-mail: Commentletter@efrag.org

23 August 2013

Dear Sir/Madam,

**EFRAG Draft Comment Letter regarding Exposure Draft ED/2013/5 Regulatory  
Deferral Accounts**

The Danish Accounting Standards Committee set up by "FSR - danske revisorer" is pleased to submit the following comments based on consultations with members of the Utility companies working group of FSR – danske revisorer.

We fully support the EFRAG DCL.

We share EFRAG's concern that the ED results in a lack of comparability between entities that already apply IFRS and first-time adopters for an indefinite period of time. It seems to rely on coincidence (the date of first-time adoption) whether a company would be allowed to apply the interim standard or not.

In our view it would be better for IASB to prioritize work and subsequent issuance of a comprehensive standard on rate-regulated activities.

We like to mention the fact that in Denmark only very few companies in the utilities sector apply or would possibly consider applying IFRS at the moment. Therefore, the interim standard would have a very limited "audience".

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We would be happy to elaborate further on our comments should you wish so.

Kind regards

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Chairman of the Danish  
Accounting Standards Committee

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