

Febeliec answer to the CREG consultation on the proposal for functioning rules for access to the intraday market in the frame of congestion management

Febeliec would like to thank CREG for this consultation on the proposal for functioning rules for access to the intraday market in the frame of congestion management. Febeliec has in general no objections against optimization of costs, in order to reduce the total system cost. Nevertheless and as stated before, Febeliec urges the CREG to remain vigilant towards the allocation of costs to different market actors and towards impact on other markets, especially when Elia becomes an active (trading) market actor on the energy markets, actively influencing market outcomes (albeit maybe non-significantly in this case)..

Febeliec is surprised that even though the test period has not yet ended, CREG already wants to put in place a definitive mechanism, in particular since the added note from Elia only covers a single occurrence of a situation where the intraday market has been used for congestion management (11/08/2019). Febeliec wonders whether it would not be better to extend the test period, with potentially some necessary modifications, instead of already evolving towards a permanent scheme, in order to allow for some further experience building before having to take a decision. Febeliec also regrets that in part 4 of the document of the CREG is only foreseen to modify the proposed approach on initiative of Elia or CREG, omitting all other stakeholders. Moreover, it should be added that any such modification should be subject to consultation of all stakeholders.

Febeliec also takes note that Elia will not develop itself the means necessary for this (ID) trading during, but wonders which “neutral” actor will be used for this and how such neutrality will be guaranteed, as through market coupling all actors are to some extent active on the Belgian market or at least influence it. Febeliec already requested before the start of the test period that this point should also be taken into account when developing a more permanent scheme, to avoid any presumption of market impact or even worse manipulation, yet this point does not seem to be addressed.