

Febeliec answer to the CREG consultation on the request of Elia for a derogation of the minimal available cross-zonal capacity

Febeliec would like to thank CREG for this consultation on the request of Elia for a derogation of the minimal available cross-zonal capacity.

Febeliec would like to stress that it pays for 100% of the cross-zonal capacity of Elia and that it thus considers the 70%minRAM obligation to be an absolute minimum. While Febeliec appreciates that the conditions under which a derogation to this minimum 70%minRAM can be given have become more limited than in the first derogation and while Febeliec also understands that not all aspects related to loopflows and other events impacting this capacity are under the control of Elia, Febeliec insists that any limitation of cross-zonal capacity can only occur if all other efficient measures have been exhausted. The application of the derogation should only occur in exceptional circumstances and in no way become standard nor an alternative to other solutions, including investments in the grid and modifications of the allocation of cross-zonal capacity in order to enable a more efficient use of cross-zonal capacity in view of creating an integrated European electricity market. Febeliec also wants to make a specific comment on side number 22, where the CREG (correctly) indicates that if a neighboring TSO applies an action plan, with a linear trajectory, the first years could lead to a lower minRAM. However, Febeliec wants to insist that this argument ever less holds true and will so even less in the future, as the linear trajectory of an action plan also forces those TSOs to guarantee over time ever increasing cross-zonal capacities.

As the security of the grid is essential, Febeliec will not oppose the derogation granted by the CREG, but insists that for any future derogation requests, taking into account a.o. the above-mentioned comment on action plans, the CREG does not automatically grant such derogations without a clear (quantitative) justification of the enduring need for them by Elia. Febeliec also insists that the CREG diligently ex ante and ex post validates that the TSO(s) have done their utmost best, taking into account all other efficient measures, to ensure at least the minimal 70%minRAM (and even higher if grid conditions allow for it).

From:

Sent:

To:

Subject:

19 November 2021 17:17

consult.2297

CREG Consultation - Public consultation on Elias request for derogation on minimal exchange zone capacity

Dear Mr.,

Please find hereafter our reaction to the public consultation.

FEBEG thanks CREG for having the opportunity to answer CREG's Public consultation on the derogation from the minimum available exchange capacity between zones.

We refer to our previous consultation on the matter and in particular FEBEG's proposal to improve the calculation of the capacity reduction.

FEBEG also encourages CREG to have constructive discussions with the neighboring NRAs to make sure that the Action Plans are duly followed and that the Derogations are sufficiently motivated.

These comments are not confidential.

Do not hesitate to contact me if you have questions and/or remarks.

Best regards,



Federation of Belgian Electricity and Gas Companies vzw/asbl

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