

## **Febeliec answer to the CREG consultation on the objectives for Elia in 2019 with respect to the incentive on market integration**

Febeliec would like to thank CREG for this consultation on the objectives for Elia in 2019 with respect to the incentive on market integration. As already indicated during many previous consultations, Febeliec does in principle not agree with an approach under which Elia gets incentives for such objective, as this is according to Febeliec part of the core tasks of Elia. However, from a pragmatical point of view, Febeliec has observed that these incentives seem to have the desired effect and as such Febeliec will not oppose the application by the CREG of such incentives, insofar that they lead to clear and unambiguous improvements of the situation for Belgian grid users.

On the consultation itself, Febeliec regrets that Elia has not provided CREG with information and data regarding the impact of Nemolink on the import situation of Belgium, information which is very important, not only in light of this consultation but also in light of a myriad of other on-going discussions, not in the least on the proposed development plan of Elia for the next ten years, which also includes a second interconnector with the UK. Febeliec hopes that this very relevant information will be provided and discussed, if not in the framework of this consultation, at least during other forums. Transparency is of the utmost importance in this, especially since Elia is a (regulated) monopolist and as such especially transparency makes it possible for stakeholders to get a good grasp of the current and future impact, as forces of competition that provide right incentives to market players in other markets are not in effect here.

As already previously indicated, Febeliec strongly agrees with the CREG that the indicator for this incentive should indeed give Elia a strong incentive throughout the year and especially also at the end of the year, during the winter. An indicator which would allow an actor to not put forward its utmost efforts to cope with the crucial winter situation in Belgium would not be the most adequate for this incentive<sup>1</sup>.

On the decision of the CREG, Febeliec can agree with the proposed incentive by the CREG for 2019. Febeliec asks that for 2020, CREG will take into account the impact of Nemolink, on which by then hopefully sufficient data will be available, as well as Alegro, where Febeliec hopes that Elia will as soon as possible provide stakeholders with information allowing them to get a grasp on the expected impact for Belgium.

Pro forma, Febeliec also wants to react to the duration of the consultation period, which is only three weeks. Because of the limited scope in size of this consultation, Febeliec does not strongly oppose the fact that this consultation period is shorter than one month, but Febeliec strongly urges CREG to not see this as a precedent for ever short consultation periods, a trend that can also be observed with Elia or on the European level. For stakeholders to be able to form a reasoned opinion and have time for internal discussion and alignment, especially for consultations on more complex topics, a one month consultation period is the absolute minimum.

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<sup>1</sup> Nevertheless this does not imply that Febeliec considers the efforts from Elia during the winter insufficient, but rather that any applied incentive should be towards the right goal