

*Dear Mrs Detand, Dear Mr Locquet,*

*Febeliec appreciates the opportunity offered by the CREG to react to this proposed amendment of the STA. Febeliec fully agrees with the decision of ACER of 16 October 2019 (ref 12/2019) and with the analysis and proposals of the CREG in the consultation document.*

*As for the proposal by Fluxys (§14 of the consultation note), Febeliec proposes to bring the text more in line with the ACER decision and to translate “concurrent responsibility” as*

- *“hoofdelijk en solidair aansprakelijk” (iso gelijktijdig aansprakelijk) in Dutch*
- *« conjointement et solidairement responsable » (iso coresponsable) in French.*

*Febeliec believes these terms are more in line with terminology used in Belgium.*

*Kind regards,*

*Peter Claes\**

**on behalf of Febeliec**

*Federation of Belgian Industrial Energy Consumers*

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***Febeliec represents the industrial consumers of electricity and natural gas in Belgium.***