

Febeliec answer to the CREG consultation on the Transfer of Energy

Febeliec would like to thank the CRE for this consultation on the modification of the rules for the Transfer of energy in application of article 19bis, §§3-5 of the Electricity Law. Febeliec has at this point no specific comments on the proposed modifications, insofar the proposed removal of the option with respect to the valorisation of the divergence (reactive balancing) is concurrent with the introduction and continuation of the discussed alternatives of opt-out and passthrough, as discussed during the stakeholder meetings, allowing the valorisation of flexibility by a grid user without possibility of a rejection hereof by the supplier and/or BRP. Nevertheless, if in the future it would arise that these alternatives are not sufficient to allow grid users full freedom of selection of flexibility service provider, Febeliec will ask CREG to propose again alternative solution(s). With respect to the proposed simplifications for the application of the formula for the standard transfer price, Febeliec has at this point no comments.

In general, Febeliec would like to reiterate its comments on the introduction of Transfer of Energy in all markets and timeframes, including the day-ahead and intraday markets, in order to enable the full valorisation of flexibility by grid users without the preliminary consent of their supplier and/or BRP.