

## Febeliec answer to the CREG consultation on the Transfer of Energy

Febeliec would like to thank the CREG for this consultation on the Transfer of Energy (ToE), in particular related to the extension of ToE to the day ahead and intraday timeframes. Febeliec has at this point no specific comments to the proposal of the CREG to extend the existing methodology towards the day ahead and intraday timeframes and wants to stress that it is important for market functioning that market parties have the possibility to be active on all markets without prior consent of their BRP and/or supplier. Febeliec insists that, as is the case for balancing, the measure of success for ToE is not the volume that is traded which uses ToE, but the fact that because of the existence of ToE, market actors have much more options and can negotiate correct terms with different actors and as such it guarantees a better functioning of the market, even if in the end deals are struck with the grid user's BRP and/or supplier instead of a third party.

Febeliec also would like to take the opportunity of this consultation to reiterate that at the very beginning of the discussions on ToE it was in favour of a totally different model for ToE, with correction of meters, and it believes that this model would have been much easier to implement, without a.o. discussions on default price formulas, while also being able to extend more feasible to other timeframes on the one hand and to situations with multiple FSPs and BRPs per access point/service delivery point/...on the other hand. Febeliec thus wonders whether it would not be good to look again into this option, to validate whether over time, taking into account all the evolutions as well as the future evolutions in market design and products, this would not have been (and thus might be towards the future) the better design choice. Febeliec wants to avoid to end up locked-in in a design that does not allow to enable all future constellations with many more active consumers and market players and thus limit the potential of full market access. Febeliec thus invites CREG to look together with Elia and the other stakeholders into the level of future proofness of the current approach.