

## CREG Consultation (PRD)658E/69 – Febeliec reaction

Febeliec thanks the CREG for the opportunity offered to supply input to this draft decision.  
Febeliec would like to refer to its reaction to CREG Consultation (PRD)658E/64 of 13/12/2019:

*Febeliec thanks the CREG for the opportunity offered to supply input to this decision, that not only concerns possible (extra) support for innovations and research & development projects within Elia, but also a potential (extra) revenue for Elia of up to 3,7 million euros to be borne by grid users and electricity consumers in particular.*

*As for other incentives put in place for regulated TSOs, Febeliec insists on the following general principles:*

- *Incentives can only be introduced for projects / actions / results that surpass the normal, daily activities of the TSO in its quality as electricity transmission system operator responsible for transport and (residual) balancing.*
- *Only projects that are / could be beneficial for grid users can be withheld in this framework.*
- *To the extent that the projects lead to concrete results, grid users should get a fair share of the benefits, as they also made the result possible.*

*Febeliec invites the CREG to take these principles into account while evaluating the different proposed projects. This is only partially the case in Chapter 5 of the draft decision (“Evaluation method”).*

*Febeliec also invites the CREG to determine as clearly as possible how the benefits out of the results of the projects will be split between shareholders and grid users (including for longer term benefits, such intellectual property rights).*

*Febeliec does not want to comment on the individual projects and draft decisions by the CREG in Chapter 6.*

Febeliec acknowledges the reaction of the CREG to these comments on its decision (B)658E/64 of 23 December 2019. At this stage, Febeliec does not want to formulate any additional comments.  
Febeliec would like to point out that, in the Elia updated plan, the word “*confidential*” appears 604 times (!), which makes it difficult (if not impossible) for stakeholders to make a thorough assessment of the concrete Elia proposals.

Kind regards,

*Peter Claes\**

**on behalf of Febeliec vzw/asbl**

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

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*Febeliec represents industrial energy consumers in Belgium. It strives for competitive prices for electricity and natural gas for industrial activities in Belgium, and for an increased security of energy supply. Febeliec has as members 5 business associations (Chemistry and life sciences, Glass, pulp & paper and cardboard, Mining, Textiles and wood processing, Brick) and 38 companies (Air Liquide, Air Products, Aperam, ArcelorMittal, Arlanxeo Belgium, Aurubis Belgium, BASF Antwerpen, Bayer Agriculture, Bekaert, Borealis, Brussels Airport Company, Covestro, Dow Belgium, Evonik Antwerpen, Glaxosmithkline Biologicals, Google, Ineos, Infrabel, Inovyn Belgium, Kaneka Belgium, Kronos, Lanxess, Nippon Gases Belgium, Nippon Shokubai Europe, NLMK Belgium, Nyrstar Belgium, Oleon, Proxiums, Recticel, Sol, Tessenderlo Group, Thy-Marcinelle, Total Petrochemicals & Refining, UCB Pharma, Umicore, Unilin, Vynova and Yara). Together they represent over 80% of industrial electricity and natural gas consumption in Belgium and some 230.000 industrial jobs.*