

## Fluxys Market Consultation 46 - Changes in the regulatory documents – Febeliec reaction

- Febeliec thanks Fluxys for the opportunity to react to this consultation and the proposed changes in the regulatory documents.
- Febeliec regrets the timing of this consultation :
  - The consultation ends only 1,5 months before the entry into force of the proposed integration of Zelzate 2 into the VIP BENE, which leaves very little time for Fluxys to respond to the consultation reactions, and even less time for market parties to adapt to the new interconnector situation as of 1/1/2021.
  - The consultation allows only 3 weeks response time (including a holiday week), which leaves very little time for stakeholders to work out an in-depth, consensual reaction to the multiple topics tackled in the consultation documents.
- A priori, Febeliec supports the integration of the Zelzate 2 interconnection into the VIP BENE, as it simplifies the reservation process of cross-border capacity for market parties and contributes to market liquidity and integration. Febeliec regrets, however, the absence of a quantified analysis (CBA) of the impact of the proposals on market integration and price convergence. Furthermore, Febeliec requests Fluxys to perform an impact assessment on existing long or medium term contracts for capacity reservation on the Zelzate 2 interconnector and to make sure no market parties are negatively impacted by the proposed VIP integration.
- As for the proposed changes in definition of natural gas and the changes proposed to allow the injection of new gasses (i.e. biomethane) in the natural gas transmission grid, Febeliec refers to its answer to Market Consultation 47, and more specifically to the potential impact of the gas composition and quality on industrial processes, as well as on the importance of the predictability and speed of change of gas quality and composition for the integrity of industrial processes using natural gas. Febeliec strongly advises Fluxys
  - to continue to strive for a stable and predictable gas quality and composition in the whole of its grid, acknowledging that current gas quality is well within the legal specs;
  - to thoroughly consult grid users potentially impacted by the injection of “new gases” every time a new producer requests injection into the Fluxys grid.

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.*