

Febeliec answer to the CREG consultation on the proposal of decision regarding the guidelines for the accepted investment costs for the determination of the contract duration under the CRM

Febeliec would to thank CREG for this consultation on the proposal of decision regarding the guidelines for the accepted investment costs for CRM, which provides additional clarification on the categorization and acceptance of costs for the determination of the classification of investments under the CRM and the duration of the CRM contract.

Febeliec at this point has two elements to which it does not agree, related to section 3.1.7 (and related further sections in the document, e.g. the examples in section 5). It concerns the investments intended to prolong the duration of demand response without increase of the installed capacity as well as the equivalent investments for storage that lead in an increase in potentially generated MWh. For Febeliec, such investments should not be excluded, as such investment would have an impact on security of supply in Belgium under the proposed CRM design as they would allow the related assets to comply with a higher SLA category and as such would be able to provide for the same non-modified capacity a lower derating and thus a better adequacy provision. Febeliec thus asks that these categories of investments are not excluded for the determination of the investment thresholds for the categorization of the maximum allowed contract duration under the CRM.