

Febeliec answer to the CREG consultation on the request for derogation from Elia on the minimum level of capacity to be made available for cross-zonal trade

Febeliec would like to thank CREG for this consultation on the request for derogation from Elia on the minimum level of capacity to be made available for cross-zonal trade. Febeliec would like to stipulate that it is not at all in favour of derogation on the 70% minRAM requirement, as any derogation leads to lesser cross-zonal trade and as such to less European market integration. However, Febeliec understands that it is important to ensure the integrity of the system and under that premise can accept derogations to the 70% minRAM requirement to the extent that these are only intended to ensure the integrity of the system without any additional margins and after all remedial actions have been applied, and this only as a last resort measure and on a temporary basis until the structural bottlenecks have been taken care of. As such, Febeliec will not oppose the proposal by Elia as this should ensure that as much cross-zonal capacity is given to the market, insofar indeed all available remedial actions have been taken to maximize this cross-zonal capacity. Febeliec also supports that the derogation for 2021 also is limited to only one of the three derogations on the 70% minRAM that were granted in 2020 and this as far as Febeliec is concerned only for non-predictable circumstances on critical grid elements. On the proposed derogation, Febeliec strongly wants to insist that, while it understands the technical rationale for the CREG to approve the request, it is important that any such future requests are treated with the utmost care, in particular as linear action plans in several neighbouring zones should considerably alleviate the need for such derogation over the coming years, and this in order to avoid to unduly limit cross-zonal trade and thus market integration.