

Ontwerpbeslissing over de finale modaliteiten van de bepaling van de stimulansen voor Fluxys Belgium en Fluxys LNG in de periode 2024-2027 / Projet de décision sur les modalités finales de détermination des incitants pour Fluxys Belgium et Fluxys LNG au cours de la période 2024-2027

Febeliec would like to thank the CREG for the opportunity to react to the proposed incentives for Fluxys for the tariff period 2024-2027 (see (PRD)656G/49). Febeliec would like to make the following comments:

- Febeliec would like to underline that, in general, it only supports specific incentives for TSOs to the extent that the objectives aim to achieve targets beyond the "normal" operational goals linked to grid exploitation and development, and that grid users and/or society as a whole also benefit from reaching the goals, not only shareholders.
- As for methane emissions reduction, Febeliec wonders if this incentive is not already covered by other targets and measures concerning greenhouse gas emissions (climate policy).
- As for the target on energy efficiency, Febeliec wonders if no other existing subsidies or fiscal
  incentives aim to reach this goal. Furthermore, Febeliec sees no clear definition of "green energy"
  in the proposed incentive and invites CREG to clarify whether it concerns carbon neutral energy,
  renewable energy or any other type of energy.
- As for the target on stakeholder consultation, Febeliec finds the proposed incentive too vague, and invites the CREG to specify more in detail which stakeholders (or at least categories of grid users) need to be addressed by Fluxys. Furthermore, Febeliec proposes these fora to become permanent and organise at least 1 meeting per year.
- Febeliec finds the incentive on long term maintenance of the LNG installations not ambitious enough, as respecting the planned timing must be qualified as a "normal" operational goal. An incentive can therefor only be approved if the timing and/or results of the maintenance are better than planned or reasonably expected.
- Febeliec finds the incentive on the platform for solidarity with other member states far too vague and invites the CREG to specify in more detail what will be the deliverables of this incentive.
   Febeliec invites the CREG also to extent this incentive to a platform for national emergency situations.

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.