

Febeliec answer to the CREG consultation on amendment of its proposal on the investment thresholds and the investment cost eligibility criteria in the framework of the CRM

Febeliec would like to thank the CREG for this consultation on the amendment of its proposal on the investment thresholds and the investment cost eligibility criteria in the framework of the CRM.

On the proposed amendments, Febeliec wants to state that it can not provide any specific validation of the proposed 30% increase in the applicable investment thresholds, but wants to insist that the CRM has to be operated under the legal lowest possible cost criterion and that as such any increase in costs should be justifiable and validated by the relevant authorities.

Concerning the amendment of article 3 regarding possible investment costs prior to the results of the auction that can be taken into account, Febeliec insists that very clear criteria need to be defined as precondition for such costs to be allowed to be taken into account, in order to ensure that both the CEEAG and the legal lowest cost criterion are followed, thus ensuring that only project related costs that are necessary for the project at hand, regarding delivery during a capacity delivery period, are included, covering a limited period before the publication of the results of the related auctions, and not any other or historic (sunk) costs. Febeliec invites the CREG to transparently publish the list of criteria that would be applied. Moreover, Febeliec insist that approach is limited to a very limited number of auctions, covering only Y-1 auctions and only insofar participation to these auctions would still be impacted by a quickly changing economic context leading to important delays for delivery of equipment orders, referring to the argumentation given by the CREG for the proposed amendment. Febeliec can under no condition support such approach for Y-4 auctions nor can support such approach as the default standard whenever delays of equipment deliveries would reduce again, as the standard application of the amendment would undermine the chosen approach for Y-1 auctions. Indeed, any possible CRM actors with longer required lead times should participate to Y-4 auctions in order to ensure compliance between his investment cycle and the CRM framework.