

Febeliec answer to the Elia consultation on Direct Market Access (DiMaX)

Febeliec would like to thank Elia for its consultation on the its proposal regarding Direct Market Access. Febeliec takes note of Elia's argumentation and assumptions regarding the need for developing a more direct market access. While Febeliec does not necessarily follow all assumptions, Febeliec nevertheless is and always has been a very strong supporter of reducing the complexity for access to all wholesale markets in order to allow market actors to valorize amongst others their flexibility. Febeliec insist that such easier market access should be enabled as soon as possible and this over all voltage levels, including on distribution level.

Febeliec in general supports the proposals from Elia to facilitate direct market access, but also has some specific comments.

Regarding financial collaterals, Febeliec supports minimizing the barrier to entry which such financial collaterals could entail, while at the same time not negating the reason why such collaterals exist, to ensure that market actors are capable to cover their transactions from a financial perspective while not creating potential negative (financial) spill-over effects to other market actors or *in fine* grid users. As such, Febeliec supports lowering this financial barrier up to the point where such guarantee can still be maintained. Faster settlement could be one solution to ensure that both objectives can be achieved in parallel, while also other elements could be identified with a correct trade-off between all objectives.

Regarding metering requirements, Febeliec cannot support the requirements that for DSO connected delivery point, a smart meter following metering regime 3 will be required as it is not clear to what extent this metering regime is essential, while this would exclude many DSO grid users to participate to the markets as such regime is not available everywhere. Febeliec proposes to remove this requirement and indicate that a smart meter should be required without reference to any specific metering regime. Febeliec would also like to understand why Elia considers such metering regime 3 to be essential. Moreover, Febeliec wants to insist that all (compliant) submeters can be allowed for settlement, while these meters might not fully be in line with the specifications of the distribution grid smart meters being rolled out. Febeliec also wants to refer specifically in this context to submeters in CDS grids.

Regarding faster settlement, Febeliec does not oppose such proposal, but wonders how this will be done when only the TSO level is to be included as this will not cover the full BRP perimeters. Febeliec also wonders what will be the impact of such faster settlement and other proposals on data flows, in particular with regards to data transfer requirements which should not create an undue burden on all involved parties, in particular also CDSOs who might have to comply with potentially costly new data transfer requirements. As stated, Febeliec does not oppose the proposals of Elia, but would like to get a better understanding of any new operational implications (if any).