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Sent: 07 December 2018 15:02
To: marketing@fluxys.com
Cc: Baerts M.-P.
Subject: Febeliec reaction - Market Consultation 30 : Transmission tariffs for the 2020 - 2023 period

Sensitivity: Confidential

Febeliec would like to thank Fluxys for the opportunity to react to the tariff proposal 2020-2023. Febeliec would like to make the following comments:

- Febeliec understands that Fluxys wants to avoid “unnecessary” variations to the Entry/Exit split, and appreciates the evolution from the current 30/70 split to 33/67. Febeliec hopes this split will evolve further to the 50/50-level suggested by the NC TAR and invites Fluxys to propose a medium-term planning for this purpose.
- As for the use of the balance of the regulatory accounts, Febeliec appreciates that 240 million euros are used to reduce tariffs in the next tariff period. Febeliec does however not fully understand the reasoning behind the reservation of 100 million euros for future investments “to absorb future shocks”. Febeliec invites Fluxys and the regulator to make sure this remaining balance is returned to the grid users as soon as possible.
- Febeliec is surprised to see that the reference tariff for Domestic exit will more or less remain stable in 2020 compared to 2019 (slide 30 of the presentation of the workshop of 24/10/2018), and thus that most of the effect of the use of the balance of the current tariff period is for transit. Febeliec insists on a balanced approach, where domestic users get a fair share of the surpluses on the regulatory accounts.
- Febeliec fully supports the Fluxys proposal to adjust tariffs automatically within the tariff period in case of deviations between the budgeted parameters and the real parameters (para 4.1.1.1).
- As for the Injection Transmission Service on domestic points, Febeliec invites Fluxys to start a broad reflexion with stakeholders on the impact of the injection of biomethane into the TSO grid, as these injections could have a major impact on gas quality and quality variations.
- Febeliec is surprised by the substantial difference in the cross-subsidisation index (p. 19) between 2020 (0,12%) and 2021-2023 (between 3,19 and 3,63%) and invites Fluxys to explain these differences more in detail.

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on behalf of Febeliec

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Febeliec represents the industrial consumers of electricity and natural gas in Belgium.

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