From: Lapidaire Linus [mailto:Linus.Lapidaire@fluxys.com]
Sent: dinsdag 28 juni 2016 16:46
To: Usersgroup
Cc: Van den Brande Michel; Bourgeois Raphaël
Subject: Public consultation in the design of the volume of strategic reserves

Dear,

We appreciate the possibility to provide feedback on the design of the volume of strategic reserves.

We want to use the opportunity to give the following feedback:

- 1. A percentage of unplanned unavailability at only 2,8% for nuclear power generation in Belgian seems low given the multiple nuclear outages since 2012. Given the importance of nuclear power generation in the Belgian power mix we believe that the calculation of the strategic reserve should be based on conservative assumptions for nuclear power generation (based on recent historical utilisation rates).
- 2. Market conditions for traditional thermal power production in Belgium (and also neighbouring countries) are not good and there are no signs these conditions are likely to improve. This will lead to further closures of power plants in both Belgium and neighbouring countries. We therefore suggest Elia to take into account additional closures of production units on top of the already announced closures. Taking into account long term adequacy and the recent announcements on closures of production units we believe that the horizon beyond the winter of 2017/2018 should be considered and assessed.

Kind regards,

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