

Brussel, 4 december 2023

## **ODE response to the elia consultation on the incentive Cost-Benefit Analysis on Requirements for Generators applicable to existing and new Generating Units between 1 and 25 MW**

ODE appreciates the efforts that were made by elia in regards to the CBA and for consulting the market parties on this topic.

ODE would like to point out that although the outcome of the CBA seems positive on some technical parts there is a great variety of renewable electricity production installations that would be affected by it. Since these vary in age and technical properties ODE wants to emphasize that the outcome of the quantitative and qualitative analyses can not be generalized for all assets that are in scope of the CBA. **ODE therefore objects some the rather general conclusions that come forth out of this limited analysis.**

ODE already mentioned in the previous reaction that not all modifications are technically possible and definitely not financially viable for many of the diverse PGMs involved. Although the sector has provided input for the CBA this complexity is not fully visible in the report.

ODE would also like to see a more in depth and detailed analysis of the supposed benefits for the system that any of the proposed adaptations of the RfGs would imply. **ODE warns that depending on the age and type of generators the investment costs to comply with any changes could be too high causing a loss in renewable capacity and should be avoided at all cost.**

**In conclusion, ODE wants to emphasize that we object to any changes in RfGs for existing PGMs since this would severely endanger the economic viability or prove technically impossible and could lead to renewable production capacity exiting the market.**

**ODE rests at your disposal for further questions or discussion about this topic.**

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