

## FORMAL PUBLIC CONSULTATION ON THE RULES ON THE ORGANIZATION OF TRANSFER OF ENERGY

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### Centrica Business Solutions (REstore) comments

July 16th, 2019

#### Executive Summary

- *Centrica Business Solutions (REstore) welcomes and supports Elia's proposal to introduce a new ToE model for all non-CIPU Units under pass-through contracts*
- *In order to make additional units eligible to ToE, Centrica Business Solutions (REstore) asks Elia and the CREG to extend the application of the net offtake criteria for certain units without a pass-through contract*

#### **Centrica Business Solutions (REstore) welcomes and supports Elia's proposal to introduce a new ToE model for all non-CIPU Units under pass-through contracts**

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The new ToE model proposed for implementation by Elia will have a positive impact on the market, as it will widen the scope of configurations eligible for a ToE model. Centrica Business Solutions (REstore) therefore supports Elia's proposal.

#### **In order to make additional units eligible to ToE, Centrica Business Solutions (REstore) asks Elia and the CREG to extend the application of the net offtake criteria for certain units without a pass-through contract**

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Centrica Business Solutions (Restore) points out that despite this positive step forward, an additional configuration remains ineligible, even with the new ToE model proposed by Elia. These units should also be made eligible within the current scope of the law.

In the case of a delivery point with a net-injection profile and without a pass-through contract, the only solution available for the moment to benefit from a ToE model is to register the unit at the upstream level, and only under the condition that the access point has a net-offtake profile.

Centrica Business Solutions (Restore) believes that in such a case (at least the AP being net offtaker if the DP is not), the DP should still be eligible for ToE. Not going at head meter level for the participation to SDR, FCR, or mFRR can come with important added value, for example gaining significant accuracy on the baseline and therefore efficiency during the settlement.

Extending the ToE model to this configuration could be done with no change to the law, but could require further extending the scope or updating CREG's decision detailing the requirements around the net-offtake criteria.

Beyond this case, the only configuration remaining uncovered would be the one where neither the DP nor the AP are net offtakers and also without a pass-through contract. For such cases, Centrica Business Solutions (Restore) acknowledges a change in the law is needed to allow for a ToE model to be available.