

Febeliec would like to thank Elia for this consultation on the introduction of pass-through contracts within the framework of the Transfer of Energy for SDR, aFRR and mFRR. Febeliec can only welcome this extra alternative option for consumers to valorise their flexibility. However, and as already indicated in previous consultations, Febeliec would like to stress that pass-through, opt-out and the “pure” Transfer of Energy solution developed by Elia are not mutually interchangeable. The different options can cater better for specific situations of different consumers, and all three create options for increasing the valorisation of flexibility and are all long term no regret solutions. For Febeliec it is clear that all three solutions have their place and should be allowed to coexist. Febeliec also welcomes the addition in section 14.4 reverting to the CREG in case one of the involved actors in a passthrough does not want to acknowledge the existence of such contract, avoiding any party to incorrectly blocking interaction with the market without a final say by the regulator.