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Response from Eneco Energy Trade B.V. regarding the public consultation on the T&C OPA, T&C SA and Rules for Congestion Management in the framework of Icaros phase I.

First of all, Eneco wants to express her gratitude towards Elia for the opportunity to give feedback on the proposed T&C OPA, T&C SA, the rules for Coordination and Congestion Management.

In addition to the feedback provided via Febeg, Eneco wants to express a few additional points of feedback in the direction of Elia:

1. Eneco is requesting Elia to reimburse the costs imposed due to RTS activations towards SA's which hold renewable assets in their portfolio. For the offshore wind farms the subsidy regime is laid down in the Royal Decree of July 16th 2002, which is amended recently at May 30th 2023. The basic principle is a coverage of the LCOE per produced MWh. If Elia does not reimburse the costs stemming from RTS activations, then there will be a financial gap for the offshore wind farms, and, as a result, a conflict would be created with the basic principles of the Royal Decree.
2. In order to avoid market distortion, Eneco asks Elia to activate assets for RTS only in the most extreme circumstances and to provide full transparency on the reasoning behind the activation of an asset for RTS afterwards.
In addition, Eneco wants to request Elia to provide an explanation and description in the 'Rules for Coordination and Congestion Management' regarding the process of how Elia selects assets to be activated for RTS in times of congestion within the electrical zone. Eneco would like to stress the importance of a fair treatment over all SA's that are causing the congestion in the zone.
3. Eneco understands the importance of submitting accurate asset schedules before RD GCT; Could Elia explain if she considers it as a risk that SA's could eventually tend to estimate schedules for renewable assets fictively higher in order to limit the amount of missed production during a RTS activation? If so, how is Elia intending to mitigate this risk?

Eneco looks forward to Elia's answers on the questions mentioned above and to the discussions following from that. Many thanks in advance.