
From: Schulz Johannes <noreply@jotform.com>
Sent: Tuesday, 20 October 2020 15:58
To: New website; BMM consult;
Subject: Re: 20200922_Public consultation on Day-Ahead Balance Obligation of BRPs - Schulz Johannes



A new answer to consultation "20200922_Public consultation on Day-Ahead Balance Obligation of BRPs" has been submitted on our website.

Name	Schulz Johannes
Email	johannes.schulz@rwe.com
Organization	RWE Supply & Trading GmbH
Comments/suggestions to the consultation	RWE Supply and Trading GmbH very much welcomes the opportunity to respond to the public consultation organised by Elia on the removal of the day-ahead balance obligation of BRPs.

In principle, we welcome Elia's initiative as one of the pillars of development for the Belgian electricity market and thus support the removal of the day-ahead balance obligation for BRPs. We are however concerned about the de-facto implementation of a position limit where Elia will implement a step-wise removal of the balance obligation. Furthermore, we are also concerned that Elia has not defined a specific time horizon to outline when the trial run / position limit will be applied.

We would also like to highlight that current customer contracts are priced based on the current regulatory framework and that any changes within the liquid tenor of such contracts will lead to increased risks for market participants. Elia should therefore not implement any changes in a rushed manner but wait until 2022, allowing market participants to analyse the effects and price their contracts accordingly, based on a stable and predictable regulatory framework.

Elia should not expect that this measure will significantly increase liquidity in the intra-day market alone. After all it will be market participants themselves that need to bring liquidity into the market and not the TSO. Elia should only ensure that the Intraday market functions properly - also at cross-border level,

by e.g. enhancing cross-border capacity calculation in intraday.

Answer confidential ? Completely non-confidential

You can [edit this submission](#) and [view all your submissions](#) easily.