Reaction of REstore on "Procedure for Constitution of a Strategic Reserve for the winter period 2016-2017" Friday 22/01/2016

Dear Aimilios,

please find below our feedback on the open consultation regarding the procedure of constitution as proposed on the Elia website.

As there is a certain overlap between this consultation and the consultation by the CREG on the functioning rules I have not included any comments on the topics contained in both documents, these will be included in the other response.

Seen the uncertain context about the future of the strategic reserve as seen in the news about the idea of a structural reserve and the Q&A session in the federal parlement a few weeks ago and the recent decision to cancel the procurement of strategic reserves for 16-17 we suggest to keep the existing procedure as was used in 2015. Indeed this minimises the cost for all participants in the unclear context as there is no requirement to implement any changes to tools used to participate in the auction for strategic reserves.

For the rest we re-iterate our key remark of 2015: We are in favor of a longer period between the definition of the need and applicable rules and the deadline to submit the portfolio. Indeed the proposed time remains extremely short.

Except if a more longer-term future is guaranteed for strategic reserve if they are re-used for 17-18 we are clearly in favor of freezing the requirements as mentioned above. We suggest to revisit the question if and when the context for strategic reserves is clarified.

Kind Regards

Peter Schell Vice-President Regulatory Affairs

