EFET response on the derogations related to the participation of RTE in MARI and PICASSO

30 June 2022

The European Federation of Energy Traders (EFET)\(^1\) welcomes the opportunity to provide our feedback to CRE regarding the proposed derogations related to the participation of RTE in MARI and PICASSO platforms for a period of two years, including an additional year-long delay for MARI by the middle of 2025.

We consider that the reasoning presented by CRE about the derogation of RTE from PICASSO does not adequately justify a potential decision for such a derogation to be granted. The connection of RTE to PICASSO is planned for the middle of 2023 and it has already been postponed several times. We therefore request that RTE proceeds with its participation in PICASSO the soonest possible.

On the other hand, we may support the suggested derogation of RTE from MARI, as we understand that a premature go-live would not be realistic in view of all projects on the roadmap. Nonetheless, we would like to know whether CRE is planning to implement transitional measures to facilitate the earlier connection of Spain to MARI, which is planned for the third quarter of 2023. For instance, transit of mFRR balancing capacity via France is allowed in the case of the TERRE platform. Finally, we would like to understand if the request for an additional year-long delay regarding the connection of RTE to MARI is compliant with art. 62(9) of EB GL.

\(^1\) The European Federation of Energy Traders (EFET) promotes and facilitates European energy trading in open, transparent and liquid wholesale markets, unhindered by national borders or other undue obstacles. We build trust in power and gas markets across Europe, so that they may underpin a sustainable and secure energy supply and enable the transition to a carbon neutral economy. EFET currently represents more than 100 energy trading companies, active in over 27 European countries. For more information: [www.efet.org](http://www.efet.org)