

UNOFFICIAL TRANSLATION FROM GREEK

To

ADMIE

89 Dyrachiou str., Athens
Attn: BoD Chairman & CEO, Dr. M. Manousakis

CC

RAE

132 Piraeus str, Athens.
Attn: President, Dr. N. Boulaxis

SUBJECT: Public Consultation on ADMIE's Ten-Year Development Plan (TYDP) for the period 2020-2029 – Draft Plan

Athens, 24.01.2019

Dear Chairman,

The Hellenic Association of Independent Electricity Companies (HAIPP) has very recently (December 2018) submitted its positions regarding the TYDP for the period 2019-2028 (see letter 521/24.12.2018). Almost all of our observations on this letter are also applicable to the preliminary draft of the TYDP for the period 2020-2029, which is currently under consultation. This is to be expected since this draft Plan was put under consultation by ADMIE before the RAE's consultation on the TYDP for the period 2019-2028 expired.

In particular, HAIPP wishes to reiterate the urgent need for the TYDP to be complemented by a specific chapter and study examining the Transmission System's ability to connect, absorb and operate with the installed renewable capacity and energy levels provided for in the National Energy and Climate Plan (NECP) with a time horizon to 2030.

Concerning the draft TYDP for the period 2020-2029, HAIPP wishes to make the following additional remarks:

- 1) This draft Plan includes for the first time the interconnection of the Dodecanese Islands with the continental system. As rightly mentioned in Section 3.1, there are a number of strong arguments for the electrical integration of the Aegean islands into the Interconnected System. The first and foremost is the removal of energy isolation and the safeguarding of the islands' security of energy supply. At the same time the islands' interconnection will result in cost reduction for the electricity supply. We believe that the reasons given in this section are a powerful incentive for the interconnection of the Dodecanese Islands to ascend the ADMIE's priority list (just as it is the case with the interconnection of the Southern and Western Cyclades) and to speed up the timetable for its completion. We believe that the final TYDP for 2020-2029 could include the goal of interconnecting the Dodecanese in 2025 instead of 2027 which is included in the draft Plan.
- 2) The interconnection of the North Aegean Islands is still not included in ADMIE's plans (as these are reflected in the text under discussion). We believe that the very same reasons for the interconnection of the Dodecanese are also applicable to the islands of the North Aegean. Besides, ADMIE - rightly in our opinion - does not limit spatially the arguments for the interconnection of the Aegean islands (see section 3.1). As in the previous TYDP, the text under discussion (in section 3.8) refers to the Committee for the

Economic Analysis of the Electricity Supply for the Non-Interconnected Islands (MDN and its individual findings. We have stated that before and we are asking for this again that the parties involved in this Committee should make available to the public the findings as well as the assumptions on which they have been based, so that all data is available in the public debate.

- 3) In subsection 3.3.13.4 it is stated that within 12 months from May 2018 the procurement, installation, parameterization and commissioning of the new equipment and software for the "Market Management System and Clearing System for operation of the Balancing Market ", including the dry run period, will be concluded. Therefore, since ADMIE's time-plan foresees the completion of all these processes by May 2019, we ask the Operator to immediately take care of the Market Participants' training on all the issues regarding the new Balancing Market.
- 4) As we have stated in the previous consultation (see letter 521 / 24.12.2018), HAIPP believes that the TYDP 2020-2029 should include a specific timetable for the implementation of the Greece-Cyprus interconnection, taking into account the need for each EU member to achieve the target of 15% (international interconnections' transmission capacity in relation to the total installed capacity) in 2030.

Sincerely,

Giorgos Stamtsis
General Manager