

Comments on Public consultation on CONE - Pitirium SA

In the table that presents the estimations of $CONE_{fixed}$ and $CONE_{var}$ as well as the assumptions used for the calculations, we propose that the De-rating Factor of Large - Scale Battery (B2) should be increased from 20.43% to 50% for Battery energy storage systems with a capacity of 2 hours, 90% for a capacity of 3 hours and 100% for a 4 hours capacity BESS (Battery Energy Storage System). Even if the numbers included in the above Table are derived from customary international figures, different de-rating factors must apply for the Greek System.

Furthermore, in the same table the assumptions used for the calculations need to be adjusted to more realistic figures; we propose that the Capital Cost of Large - Scale Battery (B2) should be increased from 700k €/MW to 900k €/MW and 1,000k €/MW for 2 hour and 3 hour capacity system battery respectively.