

#	Name/ Organization	Document Title	Paragraph No.	Page.	Comment / Suggestion	Justification	MECI Comments 2
1							<p>General Comments of MECI</p> <p>1. First and foremost, it must be clarified that the beneficiaries for any grants or subsidies provided in the draft scheme published for consultation, are only the Generators/RES producers/plant owners. Thus, it is clarified that Electricity Suppliers, whether the incumbent or the Independent suppliers, do not receive any grants or subsidies.</p> <p>2. As a principle for safeguarding Public Interest, any benefit resulting from grants or subsidies or any form of state aid, there must be a mechanism/method, ensuring the benefits impact the consumers in a positive manner. As such, there is no legislation or framework in place to regulate bilateral contracts between private parties, i.e. independent power producers and independent suppliers that operate in the framework of Transitional Market Regulation.</p> <p>3. The conversion of some plants to hybrid and thus partially dispatchable will increase their capacity factors by decreasing curtailments, directly affecting the marginal cost of generation leading to lower consumer prices.</p> <p>4. The fact that the Trading and Settlement Rules resulting from Regulatory Decision 1/2015 are not yet in effect, hinders any possibility of Cyprus to implement support Schemes with the participation of Independent suppliers outside the Market Mechanisms.</p>
2	Bioland Promithia Ltd	THE SCHEME	1	4	<p>The Scheme includes grants, that are primarily provided by the European Union together with other state grants and are used to encourage RES producers (both existing and new) to install energy storage systems within their parks, provided that the energy produced in these parks will be sold exclusively to the EAC (Electricity Authority of Cyprus) Supply.</p> <p>This contradicts with the provisions of the Regulatory Decision 01/2015 concerning the model of the Electricity Market Regulatory Framework of Cyprus. In this way, the monopoly of the EAC Supply is entrenched, and private Suppliers are treated unfairly and gradually pushed out of the market.</p> <p>The scheme does not promote the free, fair and competitive market</p>		<p>See General Comments of MECI on the feedback received during Consultation process (point 2)</p> <p>Regarding the comment in the second paragraph, it is noted that, due to the fact that the Regulatory Decision 1/2015 and the resulting Trading and Settlement Rules are not yet in effect and operational, the government's options are extremely limited (virtually inexistent) toward drafting support schemes with the participation of all market players. Concerning Decision 1/2015 and the Trading and Settlement Rules resulting from that decision is not yet in force.</p> <p>As it is clearly stated in our General Comments.</p> <p>Furthermore the Regulatory decisions 077/2023, 076/2023 and 90/2024 provide enough incentives for all suppliers (except EAC supplier) to participate in the transitional Market by coupling PV Plants with energy storage systems as well.</p>
3	Bioland Promithia Ltd	THE SCHEME	1.3	4	<p>Phase A must be open to Individual Suppliers as well, granting them the opportunity to participate and compete fairly with the dominant incumbent company, the EAC Supply.</p> <p>This is fundamental to uphold a non-discriminatory policy within the competitive market. The exclusion of individual suppliers from Phase A not only undermines the principles of fair competition but also strengthens the position of the dominant player. It is imperative that all aid funds are allocated in a manner that promotes a fair playing field, rather than consolidating the dominance of a single entity. Any practice that discriminates in favor of the dominant player is unacceptable and runs counter to the spirit of a fair, healthy and competitive market.</p>		<p>See General Comments of MECI on point 2 and point 3</p>
4	Bioland Promithia Ltd	THE SCHEME	1.3	4	<p>A.2 should include producers engaged in CfD with individual Suppliers as well ensuring their participation in the Final Market.</p>		<p>See General Comments of MECI</p>

5	Bioland Promithia Ltd	THE SCHEME	1.1.2	4	There is a misconception. The Final Competitive Market, set to begin in mid-2025, will include half-hourly offers and bids.		This will not affect the current scheme, since all the bids from Producers will be offered in half-hourly offers.
6	TSOC	THE SCHEME	1.1.2	4	Consider rephrasing with the following: "Cyprus is not yet interconnected to Greece (Crete) and operates independently, without a wholesale electricity market (including forward, day-ahead, intra-day, and balancing markets)."	"Cyprus is not yet interconnected to Greece (Crete) and operates independently, without a wholesale electricity market (including forward, day-	noted
7	EAC-Generation	THE SCHEME	1.1.5 (ii)	5	It is stated that Cyprus current RES contribution can be increased either by standalone or hybrid storage systems. Why doesn't The Scheme provide support for standalone storage systems?		Stand-Alone Storage Systems are not eligible for funding in the absence of Electricity Market. A separate scheme was submitted to the DG COMP but it has not been able to secure the go-ahead.
8	EAC-Generation	THE SCHEME	1.1.6	5	Please advise on the expected contents of the Operation manual. We consider that the Operation manual should also be put on public consultation.		Operational Manual is beyond the scope of the current scheme since falls in the responsibilities of TSO/DSO and Regulator. Any comments or recommendations can be submitted any time
9	EAC-Generation	THE SCHEME	1.2	6	We understand that documents A – J are not individual documents and that some of them are included in the present call. Please confirm.		Some of the documents are indeed included in the present call. However, upon the announcement of the scheme, all the necessary documents will be provided as well.
10	Bioland Promithia Ltd	THE SCHEME	2	6	The aid scheme proposed, favors the Electricity Authority of Cyprus (EAC), the dominant player, over its competitors. This goes against the intended spirit of the regulation, which aims to foster a competitive environment where no single entity holds disproportionate power. By strengthening the EAC Supply through these measures, the ministry inadvertently undermines the competitive dynamics of the market. This not only entrenches the EAC Supply monopoly but also creates barriers for new and existing independent suppliers who wish to participate in the market. The allocation of aid funds is a critical aspect of market regulation. If these funds are used primarily to bolster the dominant player, it could lead to an uneven playing field. Competitors might find it difficult or even impossible to compete effectively if they do not have access to similar support mechanisms. This could ultimately harm consumers by limiting their choices and the benefits that come from a healthy competitive market. The long-term implications of such measures could be detrimental to the market's health. A market that favors the dominant player may discourage investment from other potential market entrants and could stifle the growth and diversification of the		See General Comments of MECI
11	EAC-Generation	THE SCHEME	2.2	7	Please explain why the €40 million secured from JTF is dedicated solely for hybrid Energy Storage Systems.		Please see the decision of the JTF (1) https://eufunds.com.cy/cohesion-policy/just-transition-fund-jtf/ (2) https://thaliam.com.cy/invitations/transformation-of-the-electricity-grid-to-support-the-energy-transition/ Because hybrid systems penetration reduces curtailment and the generation cost of RES PLANTS, providing lower cost of RES energy and maximized profit to the RES investor due to increase of utilization factor.
12	GG Green Energy Group Ltd	THE SCHEME	2.3	7	Η «Φάση Α» και η «Φάση Β» αναφέρονται μερικές φορές ως «Μέρος Α» και «Μέρος Β». Παρακαλώ χρησιμοποιήστε τη λέξη «Φάση» ή «Μέρος» με συνέπεια	Αποφυγή πιθανής σύγχυσης	Noted

13	EAC-Generation	THE SCHEME	2.4	7	Please clarify whether the grant amount is referring to power (kW) or storage capacity (kWh)		It is referring to both kW and kWh. See provided examples. There will be further clarifications when the final call for proposals goes public.
14	GG Green Energy Group ltd	THE SCHEME	2.4	7	Πώς θα γίνει η οικονομική αξιολόγηση; Θα χρησιμοποιηθεί ένα τυποποιημένο μοντέλο αξιολόγησης;	Ένα τυποποιημένο μοντέλο θα αξιολογούσε όλες τις προσφορές στο ίδιο επίπεδο, αποφεύγοντας παράλληλα την παραμόρφωση των αποτελεσμάτων από	Στο τελικό Σχέδιο θα υπάρχει ξεκάθαρος οδηγός. Η κατηγοριοποίηση θα γίνει για την κατηγορία A1 με βάση το IRR.
15	EAC-Generation	THE SCHEME	2.6	7	Please elaborate under what conditions existing projects may transition from FIT to one-way CFD.		The beneficiary may, if successful in Phase A2, terminate the existing FIT contract and transition to a One-Way CfD or pay as bid option.
16	EAC-Generation	THE SCHEME	2.6	7	Please explain in better detail the term "one-way CFD". It is understood to cap the electricity sale price at the value of the CFD, however it is not clear how the price will fluctuate.		The CfD price will be defined ex-ante (or pay as bid option) (1) Calculating the price as per CERA methodology (i.e. 11 Eurocent per kWh) or (2) Using the Average Market price of Greek Market , or (3) Defining through a competitive bidding pay as bid approach (with a ceiling price).
17	TSOC	THE SCHEME	2.4	7	Since the call is neutral, the grant should also aim the energy storage capacity in terms of Stored Energy (MWh) and not only in terms of power (MW).	If a storage system is granted only for the capacity (€/kW), several technologies, where storage is supplementary to the operation of the system will not be eligible. In example, a thermal storage system of an existing power thermal plant will not be eligible. Additionally, systems that operate the same inverter for storage and for RES systems will not be eligible. In example, a PV with hybrid inverter (same inverter for PV and battery) will not be eligible.	The Power Output and Actual stored Capacity will be further evaluated before the scheme is finalized. The recommendation will be adopted. The scheme already defines the number of hours that will be eligible per funding.
18	TSOC	THE SCHEME	2.5	7	According to the document: "Systems that surpass the anticipated annual production, based on the previous year's output (maximum output of previous years will be used as a cap), will not qualify for aid, or any compensation on the extra kWh supplied to the grid". If this provision applies to projects that were recently installed and were subject to curtailments, it should be clarified how the curtailments will be accounted for the calculation of the maximum output of previous years.		MECI is expected to decide on maximum energy yield according to historical data available considering among others, system size, yield and technology in previous years where curtailments were low.

19	TSOC	THE SCHEME	2.5	7	<p>A new license may be required for existing RES systems.</p> <p>As mentioned in 7.3(m) new “grid connection terms”/“Final connection terms” may be required to ensure that peak output will not exceed the previous one.</p> <p>New equipment and corresponding tests may be also required to verify this.</p>	Currently, the challenge is not only the annual energy generation but the instantaneous export to the system, due to the limited hosting capacity of the Substations.	The maximum export Power of the existing plant will not change. If a current system is rated at 1MWp, then the maximum power exported is 1MW. Under the new scheme, even if the capacity of the plant is increased to 1,2 MW, the maximum power exported should remain at 1MW. The same stands if the system converts to hybrid with storage. Thus the plant cannot exceed the 1MW power limit on export.
20	Bioland Promithia Ltd	THE SCHEME	2.9	7	<p>it is essential to define the categories A1 and A2 due to existing confusion. The confusion arises from the fact that it only refers to parks with FiT and does not refer to parks that have agreements with private suppliers. Consequently, an interested party which is in agreement with a private supplier, is forced to terminate its collaboration with the private supplier and is compelled to cooperate with the EAC Supply.</p>		See MECI General Comments above.
21	Bioland Promithia Ltd	THE SCHEME	2.6	7	<p>The scheme must include provisions to encourage all suppliers to provide competitive pricing and better services to consumers, thereby mitigating the impact of energy price crises.</p>		The Scheme will improve the flexibility of the whole system, thus all the consumers (end users) will benefit from the scheme.
22	EAC-Generation	THE SCHEME	2.7	8	<p>Please explain in better detail the term “two-way CFD”. Will it be a fixed price, or will it consist of a min-max price range?</p>		Please see paragraph 2.6 (7) the market price for all RES technologies is defined as per regulatory decision 112/2023 on a fixed price.
23	GG Green Energy Group Ltd	THE SCHEME	2.7	8	<p>Το μέγιστο εισόδημα από την αποθηκευμένη ενέργεια είναι 11cent/kWh με βάση την παρούσα ρυθμιστική απόφαση. Είναι μεγάλο ερωτηματικό κατά πόσο η επένδυση μπορεί να είναι βιώσιμη εάν αναλογιστεί κανείς τα τεράστια λειτουργικά έξοδα της Μπαταρίας.</p>		The maximum grant amount will be determined according to available market information received by our consultants. The final grant will be determined in a bidding/procurement process.
24	TSOC	THE SCHEME	2.8 & 11.ei	8 & 20	<p>Even after an interconnector becomes operational or after the 1.1.2030, the Greek spot market prices should not be solely used considering that a) the CY market will most likely be established and thus Cyprus’ DAM prices could be used and b) the GR market although already established is driven by different economic factors as compared to Cyprus as the lack of Hydro-power generation and the lack of Natural Gas operated plants. It is proposed to have the ceiling prices defined based on the lowest price between CY spot market and CERA’s cap (and/or GR spot market) regardless of operational interconnection.</p>		<p>Noted and will be evaluated. The revenues of the producers will be based on a fixed price based on the results of the bidding. Regarding the possible options of the reference price of the CfD will not affect the producers but the RES fund in the 2 way CfD. The above point will be further discussed with CERA and DG Comp.</p> <p>The establishment of a DAM price depending on CY market Status and the methodology for it is under evaluation and discussion with DG Comp and Regulator.</p>
25	Bioland Promithia Ltd	THE SCHEME	2.9	8	<p>Any references and allegations to windfall and excessive profits are false and unsustainable nowadays in Cyprus. Suffice it to say that nowadays in Cyprus we are experiencing massive and excessive curtailments that place private producers and suppliers’ viability at stake.</p>		The concern whether windfall profits are real or not, is not of significance for the scheme. Fact is however, that <u>storage implementation</u> will mitigate the effects of curtailments.
26	EAC-Generation	THE SCHEME	3.3	9	<p>Possible typo error “mature renewable energy technology criteria”, should read “mature energy storage technology criteria</p>		It will be corrected in the final version
27	Bioland Promithia Ltd	THE SCHEME	4.2.6	11	<p>There is a fundamental discrimination as stated also in our previous comments.</p>		See General Comments of MECI (1+2)

28	TSOC	THE SCHEME	3.3 & 16.7	9 & 32	<p>According to paragraph 3.3: “Additional details will be solicited for these systems, and if they meet the minimum requirements established by the TSO/Cy/DSO, they may receive preliminary approval”</p> <p>According to paragraph 16.7: “Technical eligibility of the offers is also assessed during the online application submission. Thresholds align with the technical criteria provided by MECI (or the TSO/DSO). For example, the evaluation includes ensuring that the technical proposal meets predefined technical parameters and is supported by uploading of relevant evidence.”</p>		<p>There are specific technical and other requirements that must be met for any interested party to participate and submit an application for this scheme. These minimum requirements will be checked and verified before the final selection of projects, following the recommendations of the TSO/DSO.</p> <p>MECI is currently in the process of creating a Digital Envelope for each application. All required documents will be submitted through this digital platform (DOSS), with access granted to relevant files, only to the authorities involved in the licensing procedure (per category)</p> <p>In the event that the platform is not available during the application submission period, the standard application procedure will be followed.</p>
29	AHK - ΔΣΔ	THE SCHEME	4	5	<p>The phrase “Applications for new grid connections for RES projects have not been approved as many areas have reached their hosting capacity limits” should be removed.</p>	<p>DSO has not declined any new grid connections for RES projects. However, the connection fees for new RES projects in congested areas of the Cyprus power system</p>	<p>Noted. A rephrasing of the statement will be considered. However a separate category for congested substations will be created by providing different output profile for those projects connected in areas where the hosting capacity limits have been reached.</p>
30	AHK - ΔΣΔ	THE SCHEME	4.1	10	<p>Objective 4 “providing ancillary services to the TSO/Cy/DSO” should be modified to also include flexibility services, including congestion avoidance</p>	<p>Flexibility services and products for the DSO are different from ancillary services.</p>	<p>Noted. A rephrasing of the statement will be considered.</p> <p>Please also note that the scope behind establishing hybrid plants is not to use the battery for ancillary services to the grid. It is to reduce the curtailment of the RES plant coupled with the battery and to transform the RES plant into an at least partially dispatchable plant with reduced generation cost and better economics. In addition, one can apply power injection restrictions, by modifying the generation curves and increase the penetration of RES. However the power system of Cyprus contains RES plants connected to the distribution system and not operated by the national control system.</p>
31	AHK - ΔΣΔ	THE SCHEME	4.2 - 2	10	<p>The phrase “This is due to persistent congestion, which the 10-year development plan of the TSO is unable to fully resolve until the complete rollout of smart meters and smart grids in Cyprus” should be removed.</p>	<p>The complete rollout of smart meters will not resolve any congestion issues.</p>	<p>Noted. A rephrasing of the statement will be considered.</p>
32	Bioland Promithia Ltd	THE SCHEME	4.2.6	11	<p>There is a fundamental discrimination as stated also in our previous comments.</p>		<p>See General Comments of MECI.</p>

33	GG Green Energy Group Ltd	THE SCHEME	4.3.1	4	<p>Οι μπαταρίες τείνουν να προσφέρονται με μεγέθη ισχύος ανά 1 MW. Με βάση αυτές τις απαιτήσεις, ένα Φωτοβολταϊκό (ΦΒ) πάρκο με ισχύ 3.2 MWp θα χρειαστεί να εγκαταστήσει μια μπαταρία με ισχύ 4 MW. Επιπλέον, οι μπαταρίες τείνουν να προσφέρονται σε αναλογία ισχύος προς χωρητικότητα 1:1.7 (1.7 MWh για 1 MW). Για ένα ΦΒ πάρκο με ισχύ εξόδου 3.2 MW, η ελάχιστη απαίτηση χρήσιμης χωρητικότητας είναι 9.6 MWh.</p> <p>Βάσει των παραπάνω θα χρειαστούν 6 μπαταρίες (6 MW / 10.2 MWh). Θα εφαρμοστεί κάποια ανεκτικότητα; Το συνολικό κόστος αυτού του έργου εκτιμάται στα 2,550,000 Ευρώ.</p> <p>Υποθέτοντας ότι αποθηκεύεται το σύνολο της εκτιμώμενης περικομμένης ενέργειας για το 2024, το οποίο ανέρχεται σε περίπου 1,400 MWh και λαμβάνοντας υπόψη την συνολική διαθέσιμη χωρητικότητα από την απαιτούμενη μπαταρία (3,700 MWh ετησίως), η χρήση της μπαταρίας ανέρχεται στο 38% η οποία είναι εξαιρετικά χαμηλή.</p> <p>Λαμβάνοντας υπόψη την μέγιστη επενδυτική ενίσχυση των 125.000 Ευρώ/MW, η συνολική επενδυτική ενίσχυση ανέρχεται σε 400.000 Ευρώ, ποσοστό 15.7% της συνολικής επένδυσης. Με (μέγιστη) τιμή πώλησης ενέργειας στα 0.11 Ευρώ/kWh, έχει ως αποτέλεσμα μια ετήσια ανάκτηση επένδυσης 7%. Στις καλύτερες δυνατές συνθήκες αναμένεται 14ετής περίοδος αποπληρωμής. Συμπεριλαμβανοντας πρόσθετα λειτουργικά έξοδα, στην πραγματικότητα η ανάκτηση αναμένεται να είναι 5% ετησίως. Αυτό φέρνει την περίοδο αποπληρωμής στα 20 χρόνια, οπότε η μπαταρία θα έχει φτάσει στο τέλος της ζωής της, καθιστώντας την επένδυση, στην καλύτερη περίπτωση, ανώφελη.</p>	Αποφυγή υπερδιαστασιολόγησης μπαταρίας και μείωση αρχικού κόστους επένδυσης.	According to the scheme draft, the installed battery output in MW, may be lower than the output of the RES system. The grant will be awarded based on the Battery Capacity (in relation to the power), thus according to the draft scheme, there is no limit how small system can be installed. In the specific example the rating of the battery can be 1MW with 3 hours of Storage or 0.5 MW up to 3 hours of storage (half subsidy)
34	GG Green Energy Group Ltd	THE SCHEME	4.4	7	<p>Η χρήση της λέξης “πυκνότητα” (density) είναι λανθασμένη. “Ρυθμός ροής” (flow rate) είναι ο κατάλληλος όρος.</p>	Αποφυγή πιθανής σύγχυσης.	Noted. We will re-examine the scheme paragraph and wording.
35	EAC-Generation	THE SCHEME	5	9	<p>Please explain and elaborate on the indicators of Chapter 5.</p>		They are provided in the JTF manual (is for internal use)
36	TSOC	THE SCHEME	7.1		<p>It should be clarified whether the capacities (MW) referred to this section apply to the RES system, the storage system or to aggregated RES+storage system?</p>		<p>It should be made clear that there should be no reference to aggregated RES+Storage System capacity.</p> <p>The milestone of every project is the current connection which limits the maximum temporal output of the project.</p> <p>However, a beneficiary may chose to install a storage system that does not fully utilize the maximum connection capacity.</p>
37	SSH SCANDINAVIAN SOLAR PARKS HOLDING LTD	THE SCHEME	3g	15	<p>Θεωρούμε ότι θα έπρεπε στο σχέδιο να περιλαμβάνονται και υφιστάμενα σε λειτουργία ΑΠΕ και όχι μόνο νέα τα οποία θα ενεργοποιηθούν εντός 12 μηνών. (Ετσι αφήνει να νοηθεί το σχέδιο) Από την στιγμή που όλα τα ΑΠΕ άνω των 499Kw υπόκεινται σε αποκοπές παραγωγής από τον Διαχειριστή και χάνεται αυτή η παραγωγή, θα έπρεπε να περιλαμβάνονται και αυτά στο σχέδιο. Εξάλλου στο Framework Agreement to Support EIB Advisory Services (EIBAS) Activities Inside and Outside EU-27 περιλαμβάνει στην Κατηγορία 1, υφιστάμενα ΑΠΕ που είναι σε λειτουργία με feed in tarif. Αρα θα έπρεπε στο υφιστάμενο σχέδιο να περιλαμβάνει τα υφιστάμενα ΑΠΕ του μειοδοτικού διαγωνισμού,</p>		Concerning projects already operational under support schemes (not including the transitional Market), they are eligible to participate and submit their application under category A1
38	Bioland Promithia Ltd	THE SCHEME	6	13	<p>The scheme must be revised to facilitate the entry of new suppliers, ensuring the regulatory framework supports competition</p>		<p>See General MECI Comments.</p> <p>It is noted once more that this scheme only refers exclusively to producers and not Suppliers.</p>

39	Bioland Promithia Ltd	THE SCHEME	7	14	See previous comments		See General MECI Comments. It is further noted that this scheme only refers to producers and not Suppliers.
40	EAC-Generation	THE SCHEME	7.2	14	Please clarify, how the definition of small-scale projects applies to the categories/baskets included in the Scheme.		Please see definitions in page 14
41	EAC-Generation	THE SCHEME	7.3.b	14	Please define the term independent companies and how independence will be evaluated		As per Directive 83/349/EEC
42	EAC-Generation	THE SCHEME	7.3.g	15	It is understood that the requirements refer to projects within category A2 and maybe B. Please clarify. Also, please clarify eligible projects for category A1. Please clarify the term “sufficient maturity and get hold of”, does it mean that all items h – m must be available at the time of submission?		The eligibility of projects according to the Categories is clear. However the allocation of funds will be based on the calculated IRR (in relation with the FIT price, i.e. up to 3 categories).
43	TSOC	THE SCHEME	7.3.g	15	According to paragraph 7.3.g: “Only RES projects expected to enter into commercial operation within 12 months or before 1/12/2026 shall be funded. Therefore, applicants need to demonstrate sufficient maturity of the project and get hold of...” The period of 12 months should be extended. It is not feasible for new projects to be installed and operable in 12 months, especially for the cases where the connection requires grid expansion/reinforcement works.		12 months or before 1/12/2026 (Extension of this deadline is subject to JTF Funding) Projects in category B will have more flexibility in time since those projects are not funded from JTF
44	AHK - ΔΣΔ	THE SCHEME	7 – 3 I	15	The phrase “Grid Connection (TSO/DSO): an application for the grid connection should be launched to obtain preliminary connection terms. The payment for a bidding reservation of the grid capacity may be done after the grant award” must be replaced with the following: “Grid Connection (TSO/DSO): approved preliminary terms by the TSO/DSO must be obtained, which will not require the upgrading of an existing transmission substation or the establishment of a new transmission substation. For the approval of the preliminary terms the applicant must pay the amount indicated at the preliminary terms”	it is very difficult for any new RES project without approved preliminary terms issued by the relevant system operator to become operational within 12 months following the signing of the grant agreement. If the upgrading of an existing transmission substation or the establishment of a new transmission substation is	Projects that will not be able to be operational within 12 months as per scheme, will only be eligible for category B. Please note that the scheme was firstly announce in April 2024 thus many projects have already obtained the based required licences (as per CERA website)
45	EAC-Generation	THE SCHEME	7.3.h-m	15-16	Should be renumbered as they are sub-paragraphs of paragraph 7.3.g		Noted

46	TSOC	THE SCHEME	7.3.l	15	Grid Connection (TSO/DSO): Preliminary Connection Terms should be in place.	Accepting applications for storage subsidies from projects which have applied for, but haven't yet secured preliminary connection terms, runs the risk of awarding subsidies to projects that will not be operational within the timelines specified in the scheme (12 months according to Section 13.2 Point 1.a.i.), due to the necessary grid works to enable their connection. Thus, priority in awarding grants through this scheme should be given to projects that have already secured preliminary connection terms.	See comment in point 45
47	EAC-Generation	THE SCHEME	7.3.n	16	Please clarify in a more detailed manner the operation mode of the BESS system in conjunction with the PV system, so a typical annual profile could be simulated. We also note that in another part of the document states that the TSO/DSO will have control of the system. In any case we fail to see how an annual profile will be useful taking into consideration the daily and seasonal variation of both RES generation and demand.		TSO/DSO have the authority to dispatch the storage system in case it is deemed necessary in order to minimize the overall system cost. Moreover, the TSO may, in advance, issue guidelines to producers (especially below 1 MW) regarding time periods for implementing the storage daily cycles based on the system marginal cost prices
48	EAC-Generation	THE SCHEME	7.3.o	16	As a general principle, each actor is responsible for outcomes under their control. It is unreasonable to deposit sole responsibility for obtaining the permits on the applicant for delays that maybe caused by any of the permitting authorities.		Noted but most of the problems will be minimized once the Digital Platform is available. Examples from other countries that digitalize their licencing procedures are very encouraging
49	AHK - ΔΣΔ	THE SCHEME	7 – 3 o	16	The phrase “No extensions or refunds will be granted for delays caused by any authority, as the entire licensing application process is conducted through the Digital One Stop Shop platform” should be modified as follows: “No extensions or refunds will be granted for delays caused by any authority”	It should be clearly stated that no extensions or refunds will be granted for delays caused by any authority even if the entire licensing application process is not conducted	Noted
50	Synenergia Ltd	THE SCHEME	8	16	The systems should meet reasonable technical specifications. Maximum power/storage ratio 1MW/3MWh.		
51	EAC-Generation	THE SCHEME	8.2.a	16	Please clarify the term “Guaranteed import and export capacity per period”. Does the term refer to power or energy? If the term refers to energy, then import and export energy are not the same. Also please clarify the measurement point of import/export capacity. It is also unclear how a TSO/DSO or a supply company may impose such a requirement.		The ratio refers to kW to kWh. Also see correction: "Guaranteed capacity: The proposed electrical storage system should have a guaranteed (useful) capacity corresponding to a duration based on technology and size of the plant between 1 (one) hour and 3 (three) hours..."
52	TSOC	THE SCHEME	8.2.d	16	Disbursing a 10% of the guarantee amount solely based on the submission of an inspection and maintenance certificate is not sufficient for, such submission does not imply guaranteed good operation or implementation of any measures for found issues.		Any increase of the above percentage will increase the bidding amount

53	EAC-Generation	THE SCHEME	8.2.d	16	<p>Please clarify the requirements of the guaranteed system performance and who will be responsible to conduct and approve it.</p> <p>Also, please clarify what is the “guaranteed amount” and who will disburse it.</p>		<p>MECI will be responsible for disbursing 10% annually. The TSO/DSO will monitor compliance and issue a report, which will be approved by MECI. In case of non-compliance, the guarantee will be deposited in favor of the TSO (market) to offset the costs incurred by the system due to non-compliance.</p> <p>The purpose of this process is to ensure that the revenue from non-compliance is returned to the market to help reduce the costs created by non-compliance</p>
54	Bioland Promithia Ltd	THE SCHEME	8.2.e	17	Limits the scope of use of storage especially during the summer period for PV projects. It kills the project and it makes no sense.		
55	TSOC	THE SCHEME	8.2.e	16	It should be clarified whether a storage system with RES that absorbs energy absorbed from the grid will have priority in dispatch, as defined in the 130(I)/2021 LAW	25% of energy may be from conventional systems	The requirement arises from the GBER Article 41(5)
56	EAC-Generation	THE SCHEME	8.2.g & h	17	We expect that DSO/TSOC terms will be available well in advance before submission of proposals.		The draft requirements of TSO/DSO have already been made available.
57	TSOC	THE SCHEME	9	17	It should be clarified whether existing installations currently operating in the Transitional Market are eligible to bid for” Part A1” of the scheme.		No. Existing installation that already operate in the Transitional Market are not eligible for A1. They can be eligible for category B, under certain conditions.
58	AHK - ΔΣΔ TSOC	THE SCHEME	9	18	Table 1, categories A1.2 and A2.2 should be 121kW instead of 151kW.	In order to be consistent with the rest of the document.	Noted.
59	EAC-Generation	THE SCHEME	9.2	18	<p>Please define the term “Self-Consumers”. Does it refer to net-metering and net-billing users?</p> <p>Does category A1 also refer to users other than those under a FiT scheme?</p>		Self-Consumers refers to projects under the self consumption scheme/Method.
60	EAC-Generation	THE SCHEME	9.2	18	Categories A1.2 and A2.2, please check for a possible typo error. Shouldn't be 121kW instead of 151 kW?		Yes, it should be 121kW
61	Synenergia Ltd	THE SCHEME	11	20	Provide a higher subsidy per installed MWh of storage. A proposal would be: 50% subsidy on the purchase price of the system per MWh with a maximum amount of €85,000 per MWh.	The available 40,000,000 € will promote the installation of approximately 500 MWh of storage. 500MWh is about 50% of what Cyprus urgently needs today and 15% of what will be needed to achieve the green transition targets by 2030.	Noted. The subsidy can be up to 70% based on guidelines of JTF Fund. The 125,000 Euro per MW will be for one hour and not three, but the price will be based on a bidding process.
62	Synenergia Ltd	THE SCHEME	11	20	Individual Suppliers should be eligible to participate in the Scheme.	We need a competitive market.	See MECI General Comments Above.

63	EAC-Generation	THE SCHEME	11.1.a	19	Please clarify whether the grant amount is referring to power (kW) or storage capacity (kWh). As the main expense of the BESS is the storage capacity (kWh) we consider that the grant amount should be expressed in the form of EUR/kWh. We understand that this paragraph refers to Part A1.		Please see revision point 62
64	EAC-Generation	THE SCHEME	11.1.b	19	Please clarify this paragraph. Will the applicants provide offers for both investment aid and energy price? How the offers will be evaluated? Please explain in better detail the term "one-way CFD".		The offers/bids will only refer to energy sale price. The investment aid will be constant and will be decided after category A1 is finalized.
65	EAC-Generation	THE SCHEME	11.1.d	19	Please consider that the maximum investment aid of 125,000 EUR/MW, for a three-hour system corresponds to investment aid of 41,700 EUR/MWh and thus covers only a small proportion of the total investment. Expected market prices of installed BESS are in the range of 250,000-300,000 EUR/MWh. Considering that, though unclear in the scheme, the installed BESS will be used only for reduction of curtailments, the scheme is financially unattractive.		Please see clarification in point 62
66	TSOC	THE SCHEME	11.1.d	19	Referring to restrictions on additional revenues from ancillary services in the absence of such (since those hybrid RES-storage systems will not provide any ancillary services as described in the Trading and Settlement Rules) will only lead to misconceptions.		Agreed. In case they are eligible for ancillary services in the future, they cannot receive any incomes from that until their contract expires.
67	GG Green Energy Group Ltd	THE SCHEME	11d	20	Με βάση τον κατάλογο Εξαυρέσεων από Άδειες της ΡΑΕΚ η συνολική ισχύς των ΦΒ Συστημάτων με καθεστώς λειτουργίας feed in tariff είναι ~35MW. Επομένως με βάση τις πρόνοιες του Σχεδίου το μέγιστο ποσό που αντιστοιχούν είναι ~5 εκ.€. Πολύ λιγότερα από τα 30 εκ. που αναφέρεται το Αnex Ι. Για να καταστεί εφικτή απορρόφηση του κονδυλίου πρέπει, υφιστάμενα ΦΒ Πάρκα που συμμετέχουν στην Μεταβατική Ρύθμιση της Ανταγωνιστικής Αγοράς να αλλάξουν καθεστώς. ...sale price of energy from the hybrid station will be established through a one-way CfD, which should be below the System Marginal Cost (SMC) Πως υποσεί μια επένδυση να είναι οικονομικά βιώσιμη όταν θα πωλεί	Δεν επιτρέπει την φιλελευθεροποίηση της Ανταγωνιστικής Αγοράς και την διαφύλαξη της υγιούς ανταγωνιστικότητας. Ενισχύει την μονοπωλιακή θέση της ΑΗΚ.	See MECI Comments Above regarding the inclusion of independent market participants. For your information, "Feed in Tariff" also includes the procurement process of 2012-2013 and older FIT schemes as well as systems contracted with EAC through the 2016-2018 Schemes with avoidance cost. It is further clarified that systems under the transitional market scheme (2019) are not eligible for participation. "System Marginal Cost" has a certain definition according to the Trading and Settlement Rules. See also CERA regulations regarding the support of Storage in the Transitional Market
68	GG Green Energy Group Ltd	THE SCHEME	Footnote 17	20	Μπορείτε παρακαλώ να ορίσετε τι θεωρείτε "no aid to the supplier";		See MECI General Comments above.
69	EAC-Generation	THE SCHEME	11.1.e.i	20	Considering that Part B will be issued at a later stage, we do not consider it useful to elaborate in detail in this paragraph. However, we note that the coupling with the Greek Energy Market is problematic since the Cyprus Electricity Market is expected to be operational prior to the interconnector.		This matter is under discussion with DG Competition. Both options will be discussed with the Regulator as well.
70	TSOC	THE SCHEME	11.e6.i.(footnote 17)	20	Instead of individual Suppliers, it is proposed to allow the sale of hybrid RES systems generation to other Market Participants, through OTC bilateral contracts.		Which market participants? We need to guarantee that the benefits of the scheme will be reflected to consumers. If we introduce OTC bilateral contracts between producers, we cannot guarantee that the benefits will be transferred to the end consumers.
71	EAC-Generation	THE SCHEME	11.1.e.ii	21	This paragraph refers to a variable price for both Part A and Part B of the Scheme and is contradictory to the rest of the document. Please clarify or delete.		This will not affect the revenues of the Producers, but will affect the subsidy price in part B or the price that EAC supply will purchase the Energy for A1

72	EAC-Generation	THE SCHEME	12.2	21	Application contents need clarification and streamlining to avoid repetition.		Noted
73	AHK - ΔΣΔ	THE SCHEME	12-2-d	21	Among the supporting documents required, the approved preliminary terms from the relevant system operator must be included	See comment 14.	Noted
74	EAC-Generation	THE SCHEME	12.6	23	The period of validity of the Participation Guarantee (12 months) should be equal to the validity of the offer(120 days).		Noted
75	EAC-Generation	THE SCHEME	13.2.1.a	24	Considering the permitting requirements that apply both for Categories A1 & A2, and also considering timelines for deliveries of BESS and electrical equipment, we do not consider the timelines feasible.		Please see comment on point 45
76	EAC-Generation	THE SCHEME	13.2.1.b	24	Please clarify the duration of the Contract.		Operate at least till 2030, for existing projects in category A1 or 10-year contract for A2 and B categories of the scheme. After the 2030 it will be upon the decision of the producer and supplier if they will continue with the existing scheme or participate directly to the market
77	EAC-Generation	THE SCHEME	13.2.1.v	25	Please make a clear distinction between power and energy. The sizing requirements are very confusing. Given that the intent is to grant aid on a kW basis (up to 125euros/kW), the statement for the minimum storage duration (hours) requirement is not valid.		It is referring to both kW and kWh. See provided examples.
78	SSH SCANDINAVIAN SOLAR PARKS HOLDING LTD	THE SCHEME	13.2.1.a i		Στην εν λόγω παραγραφο αλλά και σε άλλες γίνεται αναφορά ότι το ΑΠΕ θα πρέπει είναι σε λειτουργία(operational) εντός 12 μηνών, δηλαδή αφήνει να νοηθεί την ημέρα σύνδεση του ΑΠΕ στο δίκτυο. Από την στιγμή που η σύνδεση του ΑΠΕ έγκειται από την ΑΗΚ και ως γνωστό στο παρελθόν υπήρξαν πολλές καθυστερήσεις στην σύνδεση τους με αποτέλεσμα να διαρρεύσει ο χρόνος των 12 μηνών. Θα πρέπει να καθοριστεί ένας ανεξάρτητος μηχανισμός ελέγχου π.χ. από τον ΔΣΜΚ και να δίνει την έγκριση ότι ο Συμμετέχων έχει αποπερατώσει όλες τις εργασίες του και από εκεί και πέρα είναι ευθύνη της ΑΗΚ. Επίσης μαζί με την έκδοση των τελικών όρων θα πρέπει να εκδίδονται ταυτόχρονα και οι όροι σύνδεσης του ρεύματος χρήσης για να τρέχουν ταυτόχρονα τα χρονοδιαγράμματα. Όπως και να έχει θα πρέπει να καθοριστούν στο σχέδιο ξεκάθαρα και με τεχνική σαφήνεια πότε εκπνέουν οι 12 μήνες. Επίσης θα πρέπει να προβλέπεται στο σχέδιο και η δυνατότητα για εξέταση αιτήματος παράτασης για εύλογους λόγους.		Noted, see also comment 45
79	Synenergia Ltd	THE SCHEME	-	25	All RES Projects already in operation should be able to participate not only category A1, self-consumption projects, cat. A2 and cat. B.	This is against the competition	See MECI General Comments
80	AHK - ΔΣΔ	THE SCHEME	13.2 - c	25	"apply mature storage technology and the proposed electrical storage system should have a guaranteed (useful) capacity corresponding to a duration of at least two (2) hours for projects with a capacity up to 120kW, whereas larger plants must have a discharging time of at least three (3) hours at rated power.	BESSs with higher discharging times are also eligible. Also, in ANNEX II – Technical Specification is written that the BESS must: (a) have a guaranteed (useful) capacity between (1) hours (MWh/MW) to (4) hours (MWh/MW).	Noted, see point 76
81	TSOC	THE SCHEME	13.2 - d	25	It should be clarified that the provision of ancillary services (as per TSOC/DSO requirements) will be mandatory for the projects under the scheme (without additional compensation) and that a percentage of the total storage capacity should be always reserved for these services.		Noted, till the duration of the contract

82	AHK - ΔΣΔ	THE SCHEME	13.2 - d	25	Provide grid and ancillary services with technical parameters as defined by the grid operator (Annex II) and the technical guideline that DSO/TSOC will publish.	The BESS system must operate according to the technical guidelines of the relevant	Noted.
83	Synenergia Ltd	THE SCHEME	14.3	26	Without Guarantees	The owner has the benefit to keep the system at proper operation	Guarantee amounts will be reviewed in the final scheme
84	SSH SCANDINAVIAN SOLAR PARKS HOLDING LTD	THE SCHEME	14.3	26	Θεωρούμε ότι τα ποσά που ζητούνται ως τραπεζικές εγγυητικές (εξαιρουμένου του ποσού των €2.500 της συμμετοχής) είναι πολύ υψηλά. Θα έπρεπε να είναι τουλάχιστον 70% λιγότερα. Αφού τα πλείστα Πιστωτικά ιδρύματα για να εκδώσουν εγγυητική ύψους €125.000 per Mw ζητούν ως εξασφάλιση το ίδιο ποσό δεσμευμένο σε τραπεζικό λογαριασμό και με σχεδόν 0% επιτόκιο. Περαιτέρω αφού η επιχορήγηση είναι €125.000 per Mw και ο συμμετέχων έχει τις €125.000 per Mw για να τις δεσμεύσει ώστε να εκδώσει την σχετική εγγυητική δεν έχει νόημα να αιτηθεί για την επιχορήγηση. Σήμερα το κόστος αγοράς μπαταρίας για 1Mw είναι μεταξύ 120.000 έως 160.000		See above point 84
85	EAC-Generation	THE SCHEME	15.2	29	Do the evaluation criteria refer to Annex II-Appendix 2 (checklist starting from page 8)? Given that MECI requires full guarantees on the implementation and good operation of the projects, please consider the need to include detailed technical requirements, which were originally intended for an EPC contract.		Noted
86	EAC-Generation	THE SCHEME	15.3	29	Please clarify requirements for A1 and A2 separately. Also please ensure compatibility of the required documents in this section with paragraphs 7.1 h)-m) and paragraph 12.		All the three schemes will be submitted separately to avoid confusion, since the operation time will be different
87	AHK - ΔΣΔ	THE SCHEME	15 -3 - b	29	An approved issue of preliminary terms by the relevant system operator must be submitted at the prequalification approval stage for Part B.	Same with comment 14.	noted
88	EAC-Generation	THE SCHEME	15.6	30	Please clarify what aspects of the project can be finetuned during the grant preparation stage. It is important to ensure that any additional technical requirements do not result in significant increases on the cost of the project.		Technical parameters of the project will all be notified/published with the publication of the official Scheme.
89	EAC-Generation	THE SCHEME	15&16	30	Please consider that these paragraphs are the same. These paragraphs also need to be clarified and streamlined.		Noted
90	EAC-Generation	THE SCHEME	16.4	32	We understand that the ranking of financial bids for categories A2 and B refers to offer prices in euro/kWh for exported energy. If this is the case then this paragraph contradicts paragraph 15,7,a,ii, which is understood to refer in bid prices of euro/kW storage cost.		It is noted that in Category A1, the bids concern the Investment aid. In Category A2, the investment aid is constant (it will be announced before opening the scheme) and bids concern the sale price / kWh.
91	EAC-Generation	THE SCHEME	19.1	36	Please clarify the required "guarantees from two individuals". Are these different from the guarantees required in Section 14.3?		"guarantees from two individuals" can be omitted
92	EAC-Generation	THE SCHEME	20.2	36	Please clarify "implementation date". Is it proof of purchase of equipment as per 20.2, or is it operation date as per 13.2.1.a?		Implementation date is the operation date.
93	EAC-Generation	THE SCHEME	21	37-38	Please specify which documents and/or invoices are required for certification of project completion.		will be clarified in the final scheme.
94	EAC-Generation	THE SCHEME	22.3.1 & 22.3.5	38-39	Considering that the grant will be on a EUR/kW basis and will be disbursed at successful completion please explain the need to define eligible investments. Please also explain how CIF prices will be used for grant calculation.		CIF means Cost Insurance and Freight up to the export port. According to the Scheme document, section 23.3.5, the grant calculation for equipment costs will be based on the CIF (Cost, Insurance, and Freight) price for items imported directly by the company from abroad, or on the purchase price as shown on the invoice for items bought domestically. Invoices from Cypriot suppliers of machinery, equipment, or services that are not VAT-registered will not be accepted.

95	EAC-Generation	ANNEX I	-	-	The maximum budget for Categories 1.1-1.4 exceeds the available budget of 35 million euro.		Will be revised	
96								
97	GG Green Energy Group Ltd	ANNEX I	7ai	30	If the total amount of investment aid requested by all applicants within a specific category falls below the budget allocated for that category, only 80% of the total requested investment sum will be granted. Δεν θα έπρεπε να ισχύει το αντίθετο		No. The total investment aid requested by all applicants should be more than the available budget in order to promote competition amongst participants.	
98	AHK - ΔΣΔ	THE SCHEME		31	ANNEX III should be replaced by ANNEX II.	N/A		
99	AHK - ΔΣΔ	ANNEX II	N/A	N/A	The uploaded document is not the final document prepared and submitted by TSOC and DSO.	The correct document must be uploaded.	Noted	
100	AHK - ΔΣΔ	ANNEX II		3	1	DSO disagrees with the scheme's terms, that the eligible installations should be able to absorb energy from the grid up to 25% on an annual net-metering approach. The charging of storage system must be done exclusively with energy produced by the RES unit that is part of the same installation. Absorbing energy from the grid should be allowed only if the relevant system operator request it.	N/A	Noted
101	AHK - ΔΣΔ	ANNEX II		4	2	The table should be modified as follows: Row 8: "In this case, the TSO or DSO shall command the storage system for a specific level of absorption." to be replaced with "In this case, the TSO or DSO shall command the storage system for a specific level of injection." Row 9: "Not applicable" to be replaced by "In this case, the TSO or DSO shall command the storage system for a specific level of absorption."	Since the storage systems will be allowed to absorb energy from the grid, then functionality in row 9 is applicable.	Noted
102	EAC-Generation	ANNEX II	4.1		2	The operation description states that the TSOC/DSO shall have control over the system and be able to either curtail energy or inject/absorb from the storage system and also be able to activate/deactivate provision services. We believe that the specific operating modes must be clearly stated and ensure that BESS are not operated to the detriment of the facility (i.e., the BESS is charged/discharged in days without need of curtailment). Please clarify the term "provision services". Does it mean ancillary services? If so, then requirements should be specific.		Noted
103	EAC-Generation	ANNEX II	4.1		2 to 3	Given that "eligible installations will be able to absorb energy from the grid up to 25% on an annual net-metered approach", we cannot see which operation mode allows for this. We believe that operating mode number 9 should be applicable.		Noted
104	EAC-Generation	ANNEX II	4.3.1		4.-1	We consider the requirement "the storage system maximum input/output power should match the installed capacity of the RES unit" too restrictive. We propose the requirement to be "... should not exceed...", so that a storage system with smaller power rating may be submitted. This may be due to economic and/or technical considerations (i.e., a cash flow limitation, or space limitations in existing RES installations)		It is not restrictive. The output of the storage system is only limited from the actual system connection to the grid. If we consider any increase in capacity of the connection point, we put ourselves in the risks related to the saturation of the grid substations.

105	EAC-Generation	ANNEX II	4.3.1		<p>The storage duration requirement is quite problematic.</p> <p>(a) We understand that RES in this paragraph is meant to be PV, however wind and biomass are RES systems too.</p> <p>(b) We understand, for PV systems between 1 and 10MW, the requirement to be for a 3 hour duration storage system. How would a different sized system be evaluated, as regards to eligible investment? Similar considerations for other PV system sizes and other RES technologies must also be addressed.</p> <p>(c) Considering that own contribution is expected in this scheme, how will investment of the storage be recovered?</p> <p>(d) Under the terms of the scheme, the TSOC/DSO may/will also use the 1 cycle per day to shift energy even on days without curtailment, to help support the electricity system. In this case the RES+storage plant will also incur the storage losses, thus making the investment even less attractive. Please elaborate if or how these losses will be remunerated.</p> <p>(e) Please consider that BESS manufacturers offer typical designs of 1, 2 and 4 hour duration, with 2 hour systems being the most common, each with their own typical storage sizes. Untypical storage sizes and durations can certainly be done, but they may raise prices and delay deliveries. Please consider offering some flexibility in the sizing requirements so that cost can be optimised.</p>		Case studies will be published.
106	EAC-Generation	ANNEX II	5	04-May	<p>Regarding installations up to 120 kW we note that the requirement that no energy is absorbed from the grid is more strict than the 75% from RES requirement. Also there is contradictory requirement regarding the operation and management of the above plants. Either investors determine how to operate the storage system, or the TSOC/DSO specify a load curve. Please clarify how the daily profile will be set by the TSOC/DSO. Economic considerations similar to those regarding the larger systems apply.</p>		There is a similar answer above.
107	AHK - ΔΣΔ	ANNEX II	5	3	<p>The phrase “The equipment must ensure that in all operating modes, no energy is absorbed from the grid, and they have to follow the pre-defined operation schedule from TSOC/DSO, which is subject to change one time per year based on the scheme’s requirement with one cycle per day. Also, the total power output to the grid from the installation (storage and RES system) cannot exceed the licensed (allowed) power.” should be adapted as follows:</p>	<p>The pre-defined operation schedule from TSOC/DSO might change several times within the year.</p>	Noted
108					<p>“The equipment must ensure that in all operating modes, no energy is absorbed from the grid, and they have to follow the pre-defined operation schedule from TSOC/DSO, which is subject to change one or more times per year based on the scheme’s requirement with one cycle per day. Also, the total power output to the grid from the installation (storage and RES system) cannot exceed the licensed (allowed) power.”</p>		noted
109	AHK - ΔΣΔ	ANNEX II – Technical Specification	N/A	N/A	<p>Generally, the specifications presented in this document are indicative, and the system operators will adjust some specifications and situational guidelines.</p>		noted
110	AHK - ΔΣΔ	ANNEX II – Technical Specification	A	1	<p>The phrase: “The PoC of BESS at the Voltage Level, at the HV bay of an HV/MV substation, feeding the corresponding HV/MV power transformer.” should be removed</p>	<p>The PoC of BESS could be at any voltage level, depending on the BESS rated power.</p>	noted

111	AHK - ΔΣΔ	ANNEX II – Technical Specification			According to Table 2 in page 18 of “THE SCHEME”, the deadline for submission is only 2 months from the call opening. As a result, new projects must obtain the mandatory licenses, including the preliminary terms from the relevant system operator. However, according to the approved, “Connection Process to the Distribution System” by CERA, the expected time for the issue of the preliminary terms is significantly higher than 2 months.	N/A	See point 45
112	AHK - ΔΣΔ	ANNEX II – Technical Specification	IV-9	7	Generally, the owner should consult the fire agency office for all new BESS installations (in fields or buildings).		noted
113	EAC-Generation	all	General comment		Overall structure of the Call needs improvement and clarification. We suggest reorganising the documents so that for each call A1, A2 and B, the requirements are clear and in one place.		The scheme categories will be separated at the call phase for each category
114	EAC-Generation	all	General comment		It is not clear if existing facilities without a FIT agreement can participate in the scheme.		Category A1 is only for existing projects. Category A2 is for new projects while category B is for all projects.
115	EAC-Generation	all	General comment		The scheme fails to take into consideration the upcoming operation of the Electricity Market in Cyprus, expected in 2025.		See Comment 1 and 2
116	EAC-Generation	all	General comment		It is not clear how the Scheme will be compatible with the operation of the Cyprus Electricity Market. We understand that support schemes should not create market distortions, as per EU legislation. We recommend that Electricity Market compatibility is verified with CERA and the Market Operator.		The support schemes do create market distortions but they are eligible since they follow the State Aid Guidelines
117	EAC-Generation	all	General comment		EAC Generation in its effort to reduce electricity prices, includes its RES in Regulatory Value Asset Base (RVAB) and sells their generation at the regulated wholesale tariff (T-W). It seems that the proposed scheme doesn't allow the inclusion of EAC Generation existing RES projects. Therefore, EAC Generation expects modifications to the scheme in order to reduce system costs to the benefit of all consumers.		Noted