

Subject: FEBEG comments on ELIA's Public consultation of the study on baseline methodologies
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FEBEG thanks ELIA for having the opportunity to react ELIA's Public consultation of the study on baseline methodologies¹.

The inputs and suggestions of FEBEG are not confidential.

Our remarks

On part A (Baseline methodology performance) FEBEG agrees with ELIA's conclusions regarding the currently offered baselining options for mFRR, ToE DA/ID, CRM, Strategic Reserves & aFRR with one remark. The 'last QH' baselining is not accurate when a 1st mFRR activation is followed by an interruption of 15 to 30 minutes and then followed by a 2nd activation. This poses a risk for non-compliance while the requested power has correctly been delivered. FEBEG would suggest to include a ramp-down in the activation period. Although the occurrence is today not too frequent, it can be expected to increase in the future with an increased need for balancing. This review of the baselining methodology would be an excellent opportunity to tackle this issue before it becomes a frequent problem.

On part B FEBEG fully agrees that the option (as discussed in section 5.1) to create a process for FSP's to introduce their own baselines would not be workable. Seen the potential impact on balancing perimeters any new baseline would need to be studied rigorously. Launching these studies for potentially stand alone projects is not feasible.

With regard of the developing declarative baselines for ToE DA/ID, CRM & mFRR, or the development of real time baselines for aFRR with RES, FEBEG is aligned with the conclusions of Elia, with one nuance for mFRR: the introduction of a declarative baseline methodology is necessary (but not sufficient) to enable the participation of wind and solar PV. FEBEG supports the introduction of them. However seen the many subjects under discussion and implementation, FEBEG thinks the implementation should be prioritised in function of the effective use that will be made of the proposed solutions and the additional capacity it yields.

¹ https://www.elia.be/en/public-consultation/20210927_public-consultation-of-the-study-on-baseline-methodologies