Expert Working Group of Dec 10th, 2014 – Minutes of Meeting

Present:

Jacques Gheury	CREG
Patricia Debrigode	CREG
Bart De Waele	CREG
Farid Fodilplacha	BRUGEL
Luc Decoster	Eandis
Lieven Degroote	Eandis
Pieter-Jan Mermans	Restore
Peter Schell	Restore
Florent Dalez	ENI
Bruno Gouverneur	Synergrid
Didier Halkin	ORES
Amandine Leroux	Resa
Daphne Benzennou	Sibelga
Cedric De Jonghe	Actility
Paul Kreutzkamp	Next Kraftwerke
Vanessa De Wilde (VDW)	ELIA
Hans Vandenbroucke (HVDB)	ELIA

Agenda

- Baselining
- SDR 2015 process for prequalification
- Planning submission offer to ELIA

1. Baselining

- VDW starts explaining the proposal made by Aggregators during previous Expert Working Group of Nov 17th. She continues elaborating on the baseline method (High X of Y) and the adjustment performed (so-called "uncapped symmetric additive"). The baseline is calculated by averaging the load for each 1/4h on those X days. The proposed adjustment is made on the measured data of the day, prior to the notification. The average consumption on the day of the DR event on the period of the 3 hours preceding the notification of the event is calculated. The difference between this average consumption and the average consumption (calculated on the same period of time) over the X days is then added (with its sign) to the baseline.
- P-J. Mermans (RESTORE) asks if R3DP will also make use of such a baseline. VDW replies that there is no change to the current applied method for R3DP, i.e. using the last 15'-value prior to activation as baseline for activation control.
- C. De Jonghe (ACTILITY) points out the risk of an end customer boosting its consumption (and hence departure basis of baseline) when a high probability of SDR-activation exists. P. Schell (RESTORE) replies that this is in any case a probability and the end customer will hence have to consume more in case of deemed SDR-activation, at (potentially) extra costs (in case Day Ahead-indexed supply contract).
- B. De Waele (CREG) asks why only the lowest consumption is removed in the 4 out of 5 (2 out of 3) selection, why not to remove both extremities. VDW replies that the call for SDR will probably happen when the load is high and the adjustment made brings the baseline back to a right level. Moreover P.

Schell (RESTORE) states the Enernoc-report revealed that this (removal of lowest consumption) had no impact as there is more divergence on lower consumption levels than on higher consumption levels, that low consumption levels are more exceptional and that Enernoc advised to shift from 6 out of 8 (removing both extremities) to only removing lowest consumption (4 out of 5).

- D. Benzennou (Sibelga) proposed to apply a correction factor linked to weather conditions. P. Schell (RESTORE) agrees that this possible but states that an equilibrium is sought between accuracy and feasibility/pragmatism. The impact of the weather is (partially) taken into account with the adjustment.
- C. De Jonghe (ACTILITY) asks how the activation control process will process the individual metering results by EAN. VDW replies that the individual baseline will be constructed, energy activated will be calculated per EAN and then aggregated per SDR-provider per DNO. ELIA will aggregate the energy activated per SDR-provider over all DNOs.
- HVDB concludes with stating that current proposed baseline method is validated within Expert Working Group and will be presented to Task Force iSR on 19/12 for validation and inclusion in product design.

2. SDR prequalification process

- L. Degroote (EANDIS) starts explaining current sequential process on a high level viewpoint, identifying the various DNO-components of a valid prequalification: Customer Connection Contract Check (CCCC) and Network Flex Study (NFS). He also explains this from an EAN viewpoint: from Access Register, over CCCC and NFS, to a Flex register (i.e. list of EANs combined with product and FSP) and Flex Activation Register (containing the calculated flex per EAN which then aggregated to requestor or ELIA under Data Services).
- D. Benzennou (Sibelga) stresses that already now a compliancy check can be requested and one need not top await the deadline. The new CCCC will be available beginning of January 2015. P. Schell (RESTORE) requests if the CCCC is especially important for Emergency gensets. L. Degroote (EANDIS) confirms. C. De Jonghe (ACTILITY) request if, upon reception of a CCCC, there is still enough time to align (make compliant) the installation with the connection contract. L. Degroote(EANDIS) states that normal process for review of connection contract applies. P-J. Mermans (RESTORE) asks what happens in CCCC-results is a non-compliancy but due to DNO missing action (eg. old contract not renewed). L. Degroote(EANDIS) replies that also here DNO will try to make this compliant, at least if it is an administrative issue. L. Degroote(EANDIS) repeats that this CCCC is a prerequisite to a NFS-request.
- With respect to Data Services, L. Degroote(EANDIS) state that these services are only delivered to Elia (and others if necessary) on metering data that is present in our databases. P-J. Mermans (RESTORE) asks if this means whether no private submetering is allowed at the DNO-grid. L. Degroote (EANDIS) replies that this means that DNOs will not perform eg. baselining activities (calculation of energy activated) on metering data that are not present in their database. F. Fodil Pacha (Brugel) adds that they are envisaging to ask the Brussels Government to impose a supply licence on any party offering flexibility from the DNO-grid. Indeed, given its potential impact on system security, financial flows associated with the activity and potential problems "Privacy", BRUGEL must consider regulating access to the aggregator activity. In addition, any transfer or handling of metering data, also in the domain of settlement of flexibility, must be treated by a neutral party, a priori the DNO. In this perspective, Brugel will propose to the Brussels government a "Chinese wall" regulation in order to guarantee an equal level playing field in practice between all market parties. P. Schell (RESTORE) asks if this is a harmonized Forbeg position. J. Gheury (CREG) replies that some topics are not only within the federal authorities competences in Belgium, but also partly within the regional authorities competences. The risk exists that trying to reach a fully harmonized position could lead to some kind of minimal agreement on those topics.

- Aggregators (P.Schell (Restore) and C. De Jonghe (Actility)) recall that for sub-metering a cost efficient solution must be envisaged and that sub-metering should remain a non-regulated commercial activity like other activities behind the head meter: this allows the most efficient solution to be chosen on a case by case basis, e.g. use of already existing sub-meters of the Grid User, for the large variety of flexibility usages.
- L. Decoster (EANDIS) adds that currently agreements are in place with respect to the roll out of the UMIG 6.0 processes and that these are to be taken into consideration while developing submetering at the DNO-grid. These UMIG 6.0 fundamentals create the necessity to develop market faced submetering by the DSOs. HVDB repeats that the primary focus of ELIA is to develop submetering at the ELIA-grid and, acknowledging the different positions of various stakeholders with respect to submetering at DNO-grid, it is not recommended to implement this now urgently, potentially endangering existing agreement in the framework of UMIG 6.0 implementation. Moreover, VDW states that the strict timing and the complexity already encountered at the ELIA-grid will not provide sufficient time for ELIA to investigate any inclusion of DNO-submetering at this stage. Finally, it is not recommended to have a dual structure with respect to meter data handling whereby DNO-submetered access points would be dealt by ELIA directly as this is not an enduring solution. Therefore, HVDB advocates to start with submetering at the ELIA-grid only and take the lessons learned before developing submetering at the DNO-grid.
- L. Degroote (EANDIS) continuous with explaining what the DNOs will do when assigning a "RED" status to the NFS. In any case, DNOs will give full motivation on the reasons why an EAN is colored red and will, whenever possible, more strictly define the time windows where problems could occur. This results in a so-called pre-specified (for limited timeframe) static green/red method. L. Degroote (EANDIS) adds that although the NFS is not product specific, in case a red status is assigned, for SDR specifically, it shall be investigated what the underlying cause is and if this is relevant for the product given its characteristics (SDR is needed in case of low wind/sun)
- Moreover L. Decoster (EANDIS) confirms that DNOs are investigating to tend towards a more dynamic congestion management but this needs time to develop. In any case, DNOs are willing to take up their role to maximize the deployment of available flexibility and consider a "red colored" EAN as an opportunity for a study to investigate the trade-off between grid investments and such dynamic congestion management systems. In practice, the current prequalified volume by the DSOs is larger than the selected volume and the applied prequalification does not hinder the well-functioning of the flexibility market.
- P-J. Mermans (RESTORE) indicates that the pool can still be enlarged after the selection by following the existing process for portfolio update respecting the notification.

3. Planning submission offer to ELIA

- HVDB refers to the various stages in the process towards submitting an offer to ELIA. He refers as well to the questions initiated by P. Schell (RESTORE) during the TFiSR of 3/12 to deal with a NFS in parallel to the certification process. HVDB replies that DNO and ELIA have investigated and put efforts into extending the NFS submission deadline from 6/3 (as indicated during TFiSR of 3/12) to 16/3.
- Nevertheless, P. Schell (RESTORE) re-iterates his request to investigate the parallel run between NFS and certification as the new date is still too short and limiting Aggregators in contracting timely additional flexibility. HVDB confirms to address this request and to provide feedback during next TFiSR of 19/12. In any case, for ELIA it is important that the outcome of the certification is unconditional and hence the submission of offers is unconditional and firm. In any case, aggregators have the opportunity to enlarge their pool after submission according to the modalities described in the relevant contracts.

4. Conclusion

- Current proposed baseline method is validated within Expert Working Group and will be presented to Task Force iSR on 19/12 for validation and inclusion in product design.
- Primary focus of ELIA is to develop submetering at the ELIA-grid and, acknowledging the different positions of various stakeholders with respect to submetering at DNO-grid, ELIA recommends not to implement submetering at DNO-grid for SDR 2015-2016.
- Aggregators request for investigation of a NFS in parallel to the certification process by ELIA. ELIA will provide feedback during next TFiSR of 19/12.