

Evaluation of the NC implementation process by BGA (Belgian Generators Associations)

06.09.2016

Elia Special Workshop Task Force
Implementation NC's



Intro

- Implementation of NC's is a complex process
 - topics at expert technical level
 - societal and economic consequences for different parties
 - different policy levels and grid voltage levels concerned
 - influenced by progress of neighboring countries and EU level (IGD's)
 - difficulty to obtain hard data from all parties
 - uncertainty about the future
 - ...
- BGA's objective: *implementation should optimize societal welfare without jeopardizing an investment friendly climate (including a level playing field and stable and reasonable responsibilities)*

Overall feeling

- General BGA feeling: time consuming process without grid users having much impact
- Insufficient use/sharing of facts, figures, in depth analyses ... in the decision making process
- BGA is positive about Elia's initiative to evaluate the process; but no endpoint today
- We welcome FOD and CREG and regional regulators to follow the process closely

Process

- Process is
 - time consuming and should be made more efficient
 - fragmented: no view on overall proposal/direction
- Proposals:
 - BGA prefers to ***receive the TSO proposals for the implementation of the requirements in one package.***
After some time for study and positioning of grid users, a constructive debate can follow with well-informed stakeholders

Content

- Elia proposals should be based on more in-depth analysis/the analysis should be shared in a detailed level (*high level presentations vs BGA written arguments*)
- Now, grid users have not enough insights in the grid issues and TSO's starting point (grid needs) can not be challenged enough
- Consultation of a third party (technical expert) should be possible
- → BGA asks for: ***transparency on reasoning and underlying figures, consequences and cost for different parties of the TSO proposals, alternative solutions, benchmark with other countries***

Roles

- The grid is at the core of the issue; how can Elia be neutral?
- Can we even expect Elia to write “neutral” consolidation notes?
- Unclear end point of the process: where does Elia stop and FOD/CREG starts? → what will be the statute of the consolidation notes?
- For BGA, consolidation note (only on SGU) is just a slightly adapted Elia position, so it should be regarded as such

Topic SGU

- We repeat our question to work also with eg. 1 MW lower threshold for type B
- We are positive that a second iteration round is scheduled

In the past black outs originated from grid operation failures. The only solution might not be within the generation units.

Thanks

