

## Reaction of FEBELIEC on the consultation on “Calculation SR volume winter 2016-2017”

Friday 26/06/2015.

Dear Madam,

Please find enclosed the Febeliec reply to the consultation :

- Transparency : Febeliec proposes a list of all “active” generation plants to be published permanently by Elia or the CREG. The list already published on Elia’s website is an excellent starting point, but we would like to see some elements added: generation capacity, operational status and announced date of closure when appropriate.
- Peak demand: current estimated peak demand figures used by Elia seem outdated and do not take into account all load flexibility that has been offered in the market (directly or through third parties). Febeliec suggests Elia to update these figures re-estimate effective peak load offtake in Belgium in different scenarios (temperature, sun/wind, demand response, load flexibility, ...)
- Electricity law: Elia several times refers to limitations set by electricity law (especially concerning the timing of the process and the role of the FPS). Febeliec proposes Elia suggests changes in the legal timing and process wherever it seems appropriate/necessary.
- Volume calculation
  - Febeliec strongly insists on the need to limit the volume of strategic reserves as much as possible, in function of physical availability of generation and/or import capacity. Interference with the market is to be limited to a strict minimum. Therefore, Febeliec cannot accept strategic reserves are set up to compensate for possible shortages created by insufficient volumes contracted by suppliers/BRPs in the electricity market.
  - Emergency generators can temporarily reduce offtake from the grid in situations of shortages and thus contribute to system stability. Therefore emergency generators at end consumers’ sites are to be allowed to participate in SDR products.

Kind regards,

**Peter Claes\***

**on behalf of Febeliec**

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***Febeliec represents the industrial consumers of electricity and natural gas in Belgium.***