

Febeliec answer to the Elia public consultation on the rules for the Transfer of Energy

Febeliec would like to thank Elia for this public consultation on the rules for the Transfer of Energy in light of the modifications brought to these rules for the balancing services in the reserved tertiary reserves by non-CIPU technical units as of 01/12/2018 and the Strategic Demand Reserve units as of 01/11/2019.

Febeliec at this point has no major comments to make to the proposed changes, but nevertheless wants to highlight some elements that should be addressed by Elia, either in the proposed text or in the larger framework of the Transfer of Energy:

- In the consulted document, Elia states in 9.3.2 on the Baseline High X of Y that the FSP has the possibility to exclude one (and only one) day based on a number of cumulative criteria. Febeliec has no intrinsic problem with the proposed methodology, other than for point iii and iv as a (planned or unplanned) maintenance or closing periods and (public) holidays differing from the past can refer to longer *periods* and thus if several of the selected relevant days fall within these periods, the exclusion of only one day does not solve the issue at hand. In such cases, either more days should be excluded, or it should be foreseen explicitly that multiple “relevant” days will not be selected in such periods.
- With respect to the allowed submeters for tertiary reserves, Febeliec hopes that Elia will come up with a solution to an already identified issue with respect to the differences in specifications for submeters between the different products that can be offered to Elia. In any case, Elia should prevent that non-harmonization of its (submeter) specifications between products leads to the exclusion of certain delivery points from participation to multiple products (that in theory should be possible). For Febeliec it is adamant that Elia removes as soon as possible all such barriers as they prevent participation from certain candidates and thus lead to a sub-optimal outcome from a system cost perspective.
- Febeliec also wants to refer to an issue that has already been brought to the attention of Elia concerning the application of penalties in case an FSP offers multiple services to Elia. In such case, the choice for the applied penalty should not lead to an extra barrier for participation. For Febeliec, it is clear that a penalty can be applied in case the services was not provided as requested. However, the application of penalties over multiple products should be just, proportionate and non-discriminate and not lead to trade-offs or less bidders and bids (e.g. bidladder versus R3 non-reserved)
- Concerning the baseline High X of Y, combination of products on a delivery point is only possible in case the same baseline is applied; however, if Febeliec is not mistaken the High X of Y baseline does not exist (yet) for bidladder, thus in practice excluding this baseline for delivery points where potentially multiple service could be offered. If Febeliec is correct, a remedy to this issue should be found as soon as possible, in order to avoid sub-optimal outcomes to the detriment of the system cost.
- A last general comment from Febeliec relates to the need for bank guarantees for the participants to Elia products. Although this issue is not explicitly covered here, Febeliec would like Elia to avoid the need for multiple bank guarantees in case an actor takes up multiple roles (e.g. BRP but also BSP) as the bank guarantee is there to cover the overall risk exposure and in case an actor takes up several roles, the risk exposure does not multiply with the same number as the number of roles taken up. For Febeliec it is important that this is taken into account, in order to avoid barriers of entry to smaller actors trying to provide services to Elia directly.