

Febeliec answer to the Elia consultation on the LFC Block Operational Agreement

Febeliec would like to thank Elia for this consultation on the LFC Block Operational Agreement.

With respect to the dimensioning of the positive and negative FRR reserve capacity on respectively yearly and daily basis, Febeliec agrees, as this is also in line with the discussions in the Work Group Balancing as well as the Febeliec position on this point. Febeliec hopes that any changes to this approach will be extensively justified and discussed in the Work Group Balancing.

With respect to art. 9 point 1b (sharing of FRR) on the fact that the reduction of the positive reserve capacity shall not exceed 30% of the size of the positive dimensioning incident, Febeliec wonders to what extent the current practices applied by Elia and its neighbouring TSOs are covered by this rule and whether this does not constitute at this moment or in the future a limiting factor, to the detriment of consumers in Belgium (and abroad, but more specifically for Belgium as dimensioning incidents weigh heavier on the overall imbalance position in Belgium as in larger countries) as this could lead to the sourcing higher contracted volumes of reserves and thus higher costs. Moreover, Febeliec would like to get a clearer indication of what will be the dimension event that will be taken into account or at least the principles for the determination of this incident.

With respect to art. 11, Elia mentions the operational procedures for cases of exhausted FRR, but Febeliec wonders where these procedures have been described and which the applicable procedures in such case are. To the knowledge of Febeliec, such procedures have not yet been published nor discussed.

With respect to the foreseen procedure for the interconnector with the UK, Febeliec takes note of the proposed solution by Elia, but wonders whether the proposed probabilistic approach will be a sufficient tool for the desired outcome and hopes to receive feedback on this procedure as well as the obtained results.

More in general, Febeliec hopes to be informed of all evolutions in the LFC Block Operational Agreement and the related operational documents and calculations, as the dimensioning of the required reserves is an important cost driver for the Elia tariffs. For Febeliec it is of the utmost importance to guarantee the stability and security of the system without however over-dimensioning the required reserves, as Febeliec has always indicated in the consultations on the Dossier Volume.

