

Febeliec answer to the Elia consultation on framework of the Network Code Emergency and Restoration

Febeliec would like to thank Elia for the public consultation on the review of the ancillary service for black start on both the review study from ELIA on the black start ancillary service as well as a new design for the future organization of the contracted ancillary service.

With respect to the study on the **review of the black start ancillary services**, Febeliec would like to make following comments:

- Febeliec thanks Elia for the very good overview of all the relevant related topics, including a benchmark study with several other European countries.
- Elia several times mentions DOSs (for example coordination with DSOs), does Elia also include CDSOs under these elements? For clarity reasons, Febeliec would like to ask Elia to either always state explicitly DSOs and CDSOs or alternative state in general that whenever the terminology DSO is used this always includes CDSO unless explicitly mentioned differently.
- On p12, Elia assumes that the nuclear phaseout will be covered by installing new thermal power plants. Although very likely, this element is not cast in stone and Febeliec would like to urge for caution here, especially on the number of such potential future thermal plants, in light of all the targets in matter of renewable energy and decarbonization.
- On p13, Elia mentions *“if this price is evaluated as being reasonable by the regulator”*. More correct would be *“not manifestly unreasonable”*, as the CREG does not pronounce itself on the reasonability but only on the manifest unreasonable nature of prices.
- On contract duration, Febeliec understands the reasoning to go for multiyear contracts, even 10 years or lifetime in some cases, as black start services are a very specific niche and require substantial investments in some cases. Febeliec would however urge Elia to take into account the trade-off between longer term contracts and thus longer periods for recovering these fixed costs versus potential new entrants or technologies that could increase competition and/or provide cheaper technical solutions.
- In section 3.2.2, Elia states that *“Most of the power plants [...] can be reached within 30 to 40 minutes”*. It would be helpful to clarify what “reached” means in this context, whether this means electrically via cranking paths or physically or communication-wise, as the sentence is now unclear and could lead to confusion. The same applies to section 5.3.2.5.
- Elia mentions it divided its connection points in six categories with different priority levels for reenergization. Are these lists and the information publicly available, in order for grid users to know what their priority will be in case of blackout?
- On p39, Elia mentions *“Regarding the Belgian energy mix, the following assumptions were made: [...] 3,6GW of thermal units on assumed sites for which studies have been done in the past and on actual or historical production locations”*. Can Elia indicate more clearly how many and which types of thermal units it has assumed and which exact methodology was used for the analysis and the evaluation of the location of such units across Belgium?
- P43 (graph) Stevin is incorrectly referred (“n” missing)
- On section 5.3.2.4, are the (network installations of) CDSOs also considered as category 2 critical connections insofar they have non-black start units on their sites (assuming already that Elia means production units here, as all sites have demand units), as they will also be required for reenergizing and reconnecting these units.

With respect to the **design note on restoration services**, Febeliec would like to make following comments:

- Febeliec thanks Elia for the very good overview of all the relevant related topics
- Febeliec will also reply to the consultation on the Terms and Conditions for the Restoration Service Provider, but notices that Elia refers to a second version of the T&C RSP and wonders when these will be made available and what Elia intends to modify to the T&Cs. Moreover, will Elia consult on these or will CREG do this?
- On p5, on the prequalification test, Febeliec would like to add that also the Relevant System Operator (RSO) should be implicated in this, as this will not necessarily always be Elia.
- On p14, Elia mentions the *“identified significant grid users”*. For practical reasons and transparency, Febeliec would like to ask Elia when the list of identified significant grid users will be composed, whether this list will be

made public and when the concerned parties will be contacted by Elia, as they seem to be implicated in the restoration plan.

- On p14, Elia mentions the DSOs. Does Elia also imply CDSOs? For clarity reasons, Febeliec would like to ask Elia to either always state explicitly DSOs and CDSOs or alternatively state in general that whenever the terminology DSO is used this always includes CDSO unless explicitly mentioned differently
- On section 3.1, could Elia please clarify what is expected from load in the central dispatch model and how this will be treated, a.o. with respect to communication and reconnection. This also refers to the question on the different priority categories mentioned in the black start study.
- Febeliec welcomes the opening up of these restoration services by Elia to an aggregation of suites, as this will potentially increase competition and thus deliver the required services at a lower price. Febeliec indeed agrees with elia that the number of potential suppliers is limited with a risk of concentrated market power and thus wants to urge Elia to continue its work to open up any product to as many as possible potential suppliers, in order to get the lowest overall system cost.
- Febeliec takes note that Elia can only assess a reasonable contractual period after discussion with interested providers (p43), but urges Elia to have as much transparency as possible on this, because of the abovementioned comment of limited suppliers and market concentration, in order to avoid any abuse and at least provide clarity on the methodology, reasoning and selected outcome. In any case, Febeliec urges also a strict follow-up and control of CREG on the offered capacities as well as the conditions, in specific the applied margin.
- For assets with a limited energy amount, Febeliec understands the inclusion of opportunity costs. However, because of the limited number of potential suppliers and market concentration, Febeliec urges for specific caution on this topic and definitely urges a strict control and validation from CREG on the proposed opportunity costs, in order to avoid excessive and potentially undue costs for the grid users.