

## *Consultation from Elia*

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### *PROCEDURE FOR CONSTITUTION OF STRATEGIC RESERVE FOR WINTER 2019-2020*

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#### *REstore comments*

*25 January 2019*

REstore welcomes the clarifications brought to the timing of the procedure following the change of the law validated in 2018, in particular regarding:

- the required publication from the CREG, at the latest on the same day of the launch of the procedure, of the criteria on which offers will be assessed as reasonable or not;
- divisibility of bids, mandatory for SGR offers;
- participation of emergency generators.

REstore challenges the increase in the availability rates of the SDR portfolio ( $R_{refDR}$ ) that are presented in the table of the chapter 7.2.2.5 - Determination of the maximum Reference Power = the heatmap. This concretely leads to a higher de-rating of DSR capacities, imposing a higher level of average availability during certain periods of the year when day-ahead and imbalance prices are  $<150\text{€}/\text{MWh}$ , *i.e.* periods of limited scarcity on the grid. During those periods of limited scarcity, a sufficient amount of capacity will be available, thus not requiring the availability of SDR at full capacity. REstore understands this increase is justified by the changes in the hypothesis of nuclear power plants availability, but challenges the decision to increase the required availability for SDR as a consequence.

Regarding the sub-meter requirements, REstore underlines the ongoing discussions regarding the relevance to allow, both at TSO and DSO level, lower accuracy requirements in order to facilitate the use of sub-metering and thus enhancing baseline accuracy. REstore believes that a marginal adjustment of sub-meter accuracy will significantly lower the costs and allow more MWs to be offered.

REstore underlines that in the current timeline, there is very limited time for the full and lengthy ToE procedure to be implemented (including CREG's decision in case of failed negotiations between the supplier and the FSP), in particular with the volume of the reserve being firm only as of September 1<sup>st</sup>. REstore asks either the CREG to foresee an accelerated procedure for ToE, or the procedure of constitution to allow for an additional delay in case such situations arise (similar to exemptions applied for SGR page 29 of the document in the case of incomplete certification).

On page 35, REstore notes a limitation for emergency generators to have a nominal capacity that does not exceed 110% of the maximum historical consumption. The justification of this limitation is not detailed in the document, and as this can lead to limiting the capacity offered, REstore asks Elia whether the figure of 110% can be re-considered, at least when cases are identified and seem reasonable.

Finally, on page 15 REstore points to a material mistake, as the text should state that “Elia will make a technico-economical selection of the REASONABLE (instead of Unreasonable) offers by the CREG...”.