

Subject: Public consultation on the LFC block operational agreement and the methodology to determine the balancing capacity in the Elia LFC block
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Please find hereafter the comments of FEBEG on ELIA's public consultation on the LFC block operational agreement and the methodology to determine the balancing capacity in the Elia LFC block.

LFC BOA

- In order to have the possibility to assess ex post the results of the new methodology for the determination of the FRR needs, FEBEG would appreciate if Elia could publish the FRR needs for 2020 calculated according to the previous methodology (cfr. dossier volumes).
- FEBEG appreciates that will start that Elia will start to publish the daily results of the new methodology as from 1.12.2019 as announced in the WG Balancing of 23.10.2019.
- Art. 8: FEBEG wants to express our concerns about the value of 99,0% of the LFC block imbalance risks that must be covered, used in the design of the probabilistic methodology and to determine the minimum threshold based on the historic LFC block imbalances. Elia chooses the minimum value imposed in art.157(2)(h) and 157(2)i of SOGL, while the imbalance risks increase with the increase of wind offshore capacity and no operational procedure in case of exhausted reserve FRR or escalation procedure is in place.
- Art 8.3: Elia uses historical data over a period of 2 years, ending not before the last day of the second month before the month of the day for which the capacity is calculated. In case of commissioning of an important wind parc between the end of the period of the historical data and the day for which the capacity is calculated, FEBEG is wondering how is this increase of wind capacity taken into account?
- Art.9.4 and 9.5: The methodology for the determination of the required aFRR results in an aFRR needs of 151 MW. However, Elia limits the aFRR needs at the same value as in 2019 (145 MW) awaiting the implementation of a new methodology that will be presented in a next version of the LFC BOA. FEBEG doubts the logic for this limitation for the following reasons:
 - The difference (6 MW) is not insignificant.
 - The variations of the LFC block imbalances increase since 2016.
 - The risk of volatility is increasing with the increase of the offshore wind capacity.
 - The implementation of the new methodology will probably not take place before 2021, so the aFRR needs will be fixed for the whole year 2020 to a

value kept at a lower level than determined by the current methodology, awaiting the new methodology.

LFC Means

- Art 6 (6.4 and 6.6): FEBEG welcomes and supports the foreseen reduction of the share of mFRR Flex and the phase out of the Flex product.
