

Fluvius reaction to public consultation on CRM (part 1 – 13/09/2019)

Remarks on Availability obligations and penalties

- Elia proposes to base the availability monitoring on central data collection. We agree with this, but feel that the implementation architecture should be designed together with the DSOs and maximally strive to reuse data platforms that are dedicated to handling 15' data
- In some cases, a CRM participant may fail to meet the obligation to deliver the obligated capacity due to an action of TSO or DSO (e.g. grid reconfiguration or congestion management). The design document does not specify what the impact on the penalties will be in this case
- The proposed way of working seems to be designed for non-residential participants connected to the MV or HV grid. If so, the document should explicitly state this and provide argumentation for it.
- In case the availability monitoring is limited to the number of AMT moments determined by T+, it is unclear whether only the first AMT moments up to the maximum number will trigger the monitoring or whether the AMT moments will be distributed over the year. The former case may be less desirable, as it removes the incentive to be available during AMT moments once the maximum number has been reached
- CMUs that are contracted for Elia Ancillary Services are considered “available” for CRM. This should also be the case (in case there are DSO Ancillary Services in the future), for CMUs that are contracted for those services. We suggest to generalize the wording such that it also covers this case

Remarks on Intermediate price cap

- With the (single) intermediate price cap, there seems to be little incentive to bid lower than the price cap as one is virtually guaranteed to be selected. This specifically has impact in a pay-as-bid scenario which is proposed for the initial auctions.