



20200302_Public consultation on Terms and Conditions for balancing service providers

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Organization	RWE Supply & Trading GmbH
Comments/suggestions to the consultation	<p>RWE Supply and Trading GmbH (RWEST) very much welcomes the opportunity to respond to the public consultation organized by Elia on the Terms and Conditions for balancing service providers for automatic Frequency Restoration Reserve.</p>

Given the current circumstances and the developing situation in light of the corona crisis we would like to focus our response on the urgent need to postpone the go-live of the new aFRR design.

In accordance with the proposal, Elia has set the 1 July 2020 as the target date for the entry into force of the new aFRR design which was based on the expected finalization of the regulatory framework in the course of 2019.

While already under normal circumstances, the delay of the finalization of the aFRR framework is posing challenges to the implementation for balancing service providers, the current situation makes compliance with a new, yet unknown, regulatory framework within three months literally impossible. Although some preparations may be able to be completed, BSPs are still waiting to receive the technical specifications' documents describing the messages to be exchanged with Elia's systems.

We therefore want to highlight that even in normal circumstances, but now in light of the corona crisis even more so, the time for implementation following the publication of the regulatory framework as well as the technical specifications will be too short and thus impossible to be accomplished.

Unfortunately it is, today, not possible to say when would be a good point in time for the new aFRR design to take effect. We thus recommend to postpone the go-live and to set a new target date in a later stage, once the regulatory

framework as well as the final technical requirements are known and an end to the restrictions imposed with regards to the corona crisis has been announced.

Answer confidential ? No