

Subject: FEBEG comments on T&C for balancing service provider for FCR
Date: 17 April 2020

Contact: Jean-François Waignier
Phone: +32 485 779 202
Mail: Jean-francois.waignier@febeg.be

Please find hereafter the comments of FEBEG on ELIA's consultation on Terms and Conditions for balancing service providers for Frequency Containment Reserve (FCR) ¹

General comments

FEBEG welcomes the continuous efforts of Elia to improve the FCR design with the objective to attract new technologies and new players. Nevertheless, FEBEG observes that some assets – which have been delivering FCR for years – are encountering technical and operational difficulties to comply with the new design discouraging them to participate to the FCR market. Such evolution is contrary to the objective of Elia to increase the liquidity in the market and to have a technology-neutral market design. Therefore, FEBEG calls upon Elia to take his impact into account in the development of the FCR market, to strike a fair balance between these evolutions and to build in sufficient flexibility in the design.

FEBEG also welcomes the simplifications and uniformization by creating a unique contractual structure applicable both to DPpg and DPsu and allowing for more efficient BMAP renominations within a single portfolio.

Specific comments

Modifications to the communication requirements (data exchange)

FEBEG suggests that Elia introduces a transition period for the modifications related to the communication requirements for the following reasons:

- the Corona crisis has an impact on the availability of resources and staff at BSP's side and their sub-contractors. At this moment it is not clear if BSP's will be able to perform the physical interventions, i.e. modification settings, testing,..., on the assets to implement the communication changes requested by Elia (especially for the availability tests) in due time;
- the technical specification documents describing the (new/changed) messages to be exchanged in real-time (with the Elia SCADA system or via electronic messages), and to nominate the FCR Energy Bids on BMAP are only available since 10/04/2020;
- these modifications are independent of the modifications in the procurement process (regional platform, 4 hours-product, symmetric 200 mHz product only,...) which can go live on 1st of July 2020.

Frequency bands (II.3.7)

It should be possible to have a DP with 0 MW in each Frequency Band, being there only in order to sustain a LER DP by delivering power together with the LER DP when its state of charge is low (but not charging or discharging the reservoir of the LER).

¹ https://www.elia.be/en/public-consultation/20200317_public-consultation-on-terms-and-conditions-for-balancing-service-providers

DP_{FCR}

This binary value indicating whether a delivery point is participating for the provision of the FCR requested is only required for DP_{FCR}. Also in Energy Bids, the FCR Power the DP will provide has to be indicated only for DP_{FCR}. For which purpose(s) will these values be used? Only as information for Elia, or also in the activation controls and availability tests?

Activation

II.10.6 : "The BSP has to ensure the recovery of the energy reservoirs as soon as possible, within 2 hours after the end of the alert state". Can Elia clarify if it is needed to wait till the end of the alert state to start the recovery? Will Elia inform the BSPs of the end of the alert state?

Prequalification

Annex 6.C (p58): a factor "4" is missing in the first term of the following expression:

$$MIN \Delta FCR \text{ Power supplied} \geq 0,9 * \min \{Max FCR \text{ Power supplied Up}; Max FCR \text{ Power supplied Down}\}$$

Availability tests

- Elia proposes to send the availability test start signal via electronic messages (XML) instead of via Scada systems as currently implemented. FEBEG requests that the current solution remains possible; the BSP should have the choice between both options.
- In case Elia requests a (partial or full) activation of a FCR Energy Bid for an Availability test, the BSP should be allowed to choose which DPs listed in the concerned energy bid will perform the availability test.
- Correction of the baseline for the FCR requested during the 20 seconds preceding the test signal: a tolerance band should be included in this correction as the FCR reaction is not instantaneous (cfr Art. II.10.3 : 50% of the FCR Requested must be reached after 15 seconds and 100% after 30 seconds).
- Energy tests should be triggered in the direction opposite to the average frequency over 5 minutes before the test trigger.
- Can Elia confirm that during an FCR availability test (capacity or energy), the BSP has to stop the delivery of the FCR and aFRR services during the test period and Elia will not charge any penalties related to the normal delivery of FCR and aFRR (i.e. no activation control) during the entire period of the test?

Activation Control

- Can Elia clarify in Annex 12 that the activation controls are performed on all energy bids together?
- The P_{meas},after should be computed over a period of 30 seconds as under the current rules, instead of 20 seconds.

Penalties for FCR Made Available

The severability of a non-compliance with the FCR Made Available is not taken into account in the "#CCTU non-compliant": 1 MW not made available during 15 minutes will have the same weight as 10 MW during 4 hours. In our view the severability should be taken into account otherwise it will give an incentive not to report minor unplanned incidents (if one knows that reporting the 1 MW unavailability for 15 minutes will penalize you for 30 days, one may decide not to report it and hope for no full activation and no availability test).