

Subject: Public consultation on Smart Testing methodology
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FEBEG thanks ELIA for having the opportunity to answer ELIA's Public consultation on Smart Testing methodology¹. Please find hereafter the comments of FEBEG in the framework of this consultation. The comments and suggestions of FEBEG are not confidential.

FEBEG comments

FEBEG supports the key objective of smart testing (for a given level of reliability, to reduce the number of availability tests) and agrees with the guiding principles for the methodology (test any part of the BSP's portfolio; unpredictability; non-discriminatory between BSPs nor technologies).

Concerning the 2 scoring systems, FEBEG agrees with the general principles but **expresses its reservation on their concrete application as the note is not fully clear on the calculation methods**:

- some formulas seem not to be correct or the description of the parameters is not clear enough:
 - Freshness Factor: should the weighting factors (4, 3, 2 or 1) or the score itself not be divided by 30 ?
 - In the formula of the Failure Factor, should the 'max(1; ...)' not be replaced by 'min(1; ...)' ?
 - For the Failure Factor, "an activation control is considered failed as defined in the T&C of the relevant product" : this concept is not defined for aFRR.
 - As regards the availability test, why a score of 50 is attributed to the Score_{ref Availability} (CCTU, M) if no availability test occurred? What could be the impact on the final score especially for the CCTU's which are rarely requested for tests (20:00-00:00h; 00:00-4:00; 4:00-8:00)?
 - The formula Score_{refMargin} (CCTU, D) is not the same in the consultation document as in the presentation made during the workshop.
 - In the formula of Activation Ratio, what is the difference between "# of QH of activation (dp)" and "total # of QH of activation (dp)" ?
- The margin analysis, as described in the note, seems only applicable for mFRR, but not for FCR nor aFRR (symmetrical or down). How is the score computed when a DP is part of bid that is continuously activated ?

Concerning the test regimes, FEBEG also agrees with the general principles but expresses its reservation on the concrete application. Successful or failed activation control is not defined for aFRR. In Test Regime 1, the number of (successful) Availability Tests per month should also be limited.

¹ https://www.elia.be/en/public-consultation/20200915_public-consultation_smart-testing

Concerning the implementation of the Smart Testing, **FEBEG agrees with the step-wise implementation starting with mFRR**, which allows to have a return on experience before implementing the Smart Testing on aFRR and FCR (as shown above, some extra development of the methodology seems needed for these products).

Elia should again consider the possibility to **send the availability test trigger via the SCADA system instead of XML message**. FEBEG understands the objective of Elia to harmonize the rules to avoid discrimination between BSPs & technologies. However, FEBEG doesn't see an issue in keeping both solutions at the choice of the BSP.