

Subject: FEBEG's position regarding Elia's Public consultation relating to the modification of Elia's LFC block operational agreement

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FEBEG thanks ELIA for having the opportunity to answer ELIA's Public consultation relating to the modification of Elia's LFC block operational agreement¹. The comments and suggestions of FEBEG are not confidential.

Overall remarks

- The different procedures to activate additional flexibility cannot be seen as a free option and need to remain very exceptional. Therefore, we welcome the reporting obligations following the activation of these procedures.
- The usage of the exhausted and high FRCE procedure should in theory, due to the FRR needs dimensioning, be very rare. Having a frequency of occurrence which is statistically improbable might hence be an indication that the methodology or assumptions behind the FRR needs dimensioning would need to be updated.

Therefore, following changes are suggested:

- The two reports (CREG and (at least) yearly market parties report) should, next to the described content, also indicate if a review of the FRR needs dimensioning methodology or assumptions is required and why (not).
- Make public the report which is shared with the CREG.
- Should, during the course of the year, the FRR reserve capacity needs be discussed, the yearly report would be an important input. Therefore the report should be made available (at least) once a year or prior to any discussion/consultation on the FRR needs or FRR needs dimensioning.
- On the adjustment of the mFRR FAT from 15 to 12.5 minutes we refer to our previous reactions.

¹ https://www.elia.be/en/public-consultation/20210615_public-consultation-relating-to-the-modification-of-elias-lfc