

Baseline methodology assessment

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Centrica Business Solutions (CBS) response to the consultation

25th October 2021

Executive Summary

Main remarks

- CBS fully supports the rollout of a calculated baseline in aFRR as soon as possible, in particular to unlock participation of technologies like wind and PV
- CBS asks Elia to consider a specific solution for assets with self-consumption or other primary usage on site (in particular in aFRR), typically residential batteries, where a 1-min upfront declarative baseline will remain a blocker for participation of certain assets

Additional points

- CBS fully supports the introduction of measures to avoid manipulation of declarative baselines but insists that a workable balance must be found e.g. allowing shorter lead times for submission in order to maintain the efficiency and interest in such baselines
- CBS believes that for scheduling assets using declarative baselines in mFRR, the 25-min GCT for bid submission should be used as a lead time, instead of the 45-min lead time for schedules
- CBS points out that there should not be a “CRM baseline” as such, and that MWs engaged in the CRM should as much as possible be monitored using the baselines of the underlying products they are sold in (e.g. mFRR)
- CBS points out that in the iCAROS framework, generation assets ranging from 1-25 MW will not necessarily send MW but rather on/off schedules, that will therefore not automatically give a useable baseline
- Finally, CBS recalls that developing new approaches (including the solution for self-consumption or other primary use assets) would benefit to FCR as well, where the next steps of the harmonization process with regards to baselining among FCR cooperation members seems to be in a dead-end

Main remarks

CBS Full supports the rollout of calculated baseline in aFRR as soon as possible, in particular to unlock participation of technologies like wind and PV

CBS welcomes the analysis and proposal made by Elia and confirms that the potential is there: unlocking the baseline at the presented conditions (which all seem ok and fair) does seem to be a quick win / no regret option. CBS therefore asks Elia to consider implementing such an aFRR baseline as soon as possible.

In that context, Centrica can provide bilaterally more confidential details on specific projects and assets that could make use of this new aFRR baseline.

CBS asks Elia to consider a specific solution for assets with self-consumption or other primary usage on site (in particular in aFRR), typically residential batteries, where a 1-min upfront declarative baseline will remain a blocker for participation of certain assets

Centrica confirms that some assets will remain in a blind spot, not being able to use declarative or calculated baselines in aFRR. This is particularly true for assets with highly volatile self-consumption or other primary use of the asset, that can't be predicted 1-min upfront (e.g. residential batteries). For such cases,

CBS has developed a specific solution, based on a preliminary filter of the signal in order to remove all the non-aFRR consumption, thereby resulting in a clean signal that can be used to efficiently apply the standard 1-min declarative aFRR baseline.

CBS is of course available to further present and discuss the details of this approach with Elia in order to assess its possible implementation.

Additional points

CBS fully supports the introduction of measures to avoid manipulation of declarative baselines but insists that a workable balance has to be found e.g. allowing shorter lead times for submission in order to maintain the efficiency and interest in such baselines.

For declarative baselines, manipulation should indeed be prevented, but not at the expense of a viable baseline. In that matter, the examples of the declarative baselines that were introduced in France for the NEBEF mechanism of RTE for demand response assets, or in mFRR in Germany for renewable technologies show the reality of this risk, since this resulted in having a baseline that could not be used.

Also, CBS points out that having anti-manipulation measures should help allowing for more flexible options regarding the lead time of the baseline submission, typically allowing for closer to real time submissions to obtain more accurate baselines.

CBS believes that for scheduling assets using declarative baselines in mFRR, the 25-min GCT for bid submission should be used as a lead time, instead of the 45-min lead time for schedules

CBS points out that there will be a discrepancy between the gate closure for submission of schedules (45 min) and of mFRR bids (25min), and asks Elia to consider allowing assets that would use a declarative baseline in mFRR to update their baseline up until the GCT of bid submission. This would increase the reliability of the baseline and would still be ahead of activation orders being sent, thereby limiting the risk of manipulation.

CBS points out that there should not be a “CRM baseline” as such, and that MWs engaged in the CRM should as much as possible be monitored using the baselines of the underlying products they are sold in (e.g. mFRR)

CBS notes that Elia refers to a CRM baseline: in this matter, CBS recalls that most of the time, MWs engaged in the CRM will be using underlying market products (DA/ID scheduling or ToE, aFRR, mFRR) to make themselves available to the grid. As all of these products have baselines already available, CBS asks that as much as possible this baseline is used, and not an additional ad hoc CRM baseline.

CBS points out that in the iCAROS framework, generation assets ranging from 1-25 MW will not necessarily send MW but rather on/off schedules, that will therefore not automatically give a useable baseline

CBS does agree with Elia’s reasoning on the use of schedules as potential declarative baselines, but asks for further clarification on the scope of iCAROS phase 2 regarding this aspect: for generation assets in the 1-25 MW range, CBS assumes that on/off schedules will be available, thereby not necessarily providing sufficient information to Elia to apply this as a mFRR declarative baseline. In that case, even with iCAROS phase 2, renewable generation assets able to provide mFRR volumes might not provide Elia with enough information if there is no declarative baseline available.

CBS therefore asks Elia to clarify this point and, in case that not all renewable assets ≥ 1 MW would necessarily send MW schedules, points out that implementing a declarative baseline in mFRR for such assets would make sense.

Finally, CBS recalls that developing new approaches (including the solution for self-consumption or other primary use assets) would benefit to FCR as well, where the next steps of the harmonization process with regards to baselining among FCR cooperation members seems to be in a dead-end.

CBS asks Elia to further consider the possibility of extending this study and the implementation plan to FCR baselines, even if this currently is out of scope. Discussions on the next wave of harmonization of the FCR product at the FCR Cooperation level, which was to encompass baselining, seem to be stuck, without any communication nor consultation of market parties since 2019.

This has led to significantly delaying the possibility to further improve the FCR baseline in Belgium. Given the absence of visibility on both the timing and the content of this next wave of harmonization, CBS asks Elia to reconsider an update of the FCR baseline in Belgium, without waiting for the FCR Cooperation's next steps. This would enhance the workability and efficiency of the baseline, both for Elia and the BSPs, especially for the roll out of new assets like residential batteries or renewables, that could be used more actively in the FCR product with a more appropriate baseline available.