

Subject: FEBEG comments on ELIA's public consultation on a request for derogation to the deadline to the use of European platform for mFRR

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FEBEG thanks ELIA for having the opportunity to react ELIA's public consultation on a request for derogation to the deadline to the use of European platform for mFRR<sup>1</sup>. The inputs and suggestions of FEBEG are not confidential.

## Febeg's comments

**We support fully this derogation and thanks Elia for the collaborative spirit regarding the balancing roadmap. We also invite Elia to keep interacting in a transparent manner with the market parties.**

We nevertheless would like to share following remarks/ attention points:

- FEBEG invites Elia to stay in touch with other TSO's as any change in their planning to connect to PICASSO (and later MARI) should trigger a review of Elia's roadmap accordingly;
- We do understand the rationale behind the observation round in May-22. However, we believe that this observation round should be finalized well ahead of summer holidays (by 2<sup>nd</sup> week of June (9/06) at the latest). We cannot exclude to experience 'child diseases' post go-live and we want to be reactive should this materialize. FEBEG members are obviously willing to avoid any risks that could jeopardize the balancing market in Belgium.
- Finally, we want again to emphasize that the 12 months implementation of MARI and iCAROS shall start at the moment the associated designs are fully finalized and validated. The presented roadmap relies on the assumption that MARI & iCAROS designs will be finalized by Jan-22 and will not need extra iterations with the stakeholders.

As final remark regarding MARI/ iCAROS, even if Elia would ever decide to delay MARI go-live, it is **critical for FEBEG's members to still have a sync local go-live mFRR/ iCAROS** because it would be nearly impossible to handle explicit bidding (RD) and implicit bidding (mFRR) at the same moment. Those projects are largely interdependent as they entail a complete refactoring of the member's IS backbone. **It will be impossible to maintain two systems in parallel.**

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<sup>1</sup> [https://www.elia.be/en/public-consultation/20211123\\_public-consultation-on-derogation-deadline-mfrr](https://www.elia.be/en/public-consultation/20211123_public-consultation-on-derogation-deadline-mfrr)