

Subject: FEBEG comments on ELIA's public consultation on the proposal of review of the Terms and Conditions applicable to providers of voltage and reactive power control service (T&C VSP)

Date: 13 December 2021

Contact: Jean-François Waignier

Telephone: +32 485 77 92 02

Mail: jean-francois.waignier@febeg.be

FEBEG thanks ELIA for having the opportunity to react ELIA's public consultation on the proposal of review of the Terms and Conditions applicable to providers of voltage and reactive power control service (T&C VSP)¹.

The inputs and suggestions of FEBEG are not confidential.

Febeg's comments

Overall, FEBEG welcomes the clarifications and improvements made in the T&C VSP. However FEBEG is of the opinion that some points can still be further improved.

Some specific remarks can be found below.

Additionally, FEBEG would like underline on overall and important concern. Currently, the MVAR tendering is a market based process, this basic market based principle is a key principle for FEBEG and its members, therefore, we insist on the market procedure (tendering) to be kept also beyond 2022.

Detailed comments

- **Compensator Mode**

As specified in Annex 12, the Injection Mode is characterized by an Active Power – either in injection or in offtake – exceeding a Minimum Active Power Threshold (specific for the Injection Mode), while the Compensator Mode is characterized by an Active Power comprised between a Minimum and a Maximum Active Power Thresholds (specific for the Compensator Mode).

The definition of “Compensator Mode” and Figure 7 of Annex 12 should be adapted to avoid the confusion between the different thresholds.

- **Art. II.5.9.** “When the Technical Unit is injecting or offtaking less than its Minimum Active Power Threshold (as agreed in Annex 1), Elia may request via an explicit order that the Technical Unit stops producing or absorbing Reactive Power”.
 - o In this case Elia should also apply a correction on the tariff for the offtake or injection of additional reactive energy as per section 2.2 of the access tariffs.

¹ https://www.elia.be/en/public-consultation/20211112_public-consultation-on-the-proposal-of-review-of-the-terms-and-conditions

- During start up and shut down phases it is operationally very complicated to react to MVAR orders of Elia. These phases (under the Minimum Active Power Threshold) should be excluded in this paragraph.
- **Art. II.8.5.** It should be also possible to include in the remuneration a compensation as a fixed term to recover the investment costs linked to adaptations that go beyond what is strictly required by the legislation.
- **Annex 1** – definitions of $Q_{tech,min}$ and $Q_{tech,max}$: is $Q_{tech,min}$ not always referring to absorption and $Q_{tech,max}$ always to production ?
- **Annex 2.A**
 - *“During the quarter-hour during which a setpoint is received by the technical unit : $Q_{req} = Q_{req_manual}$.”*
For the correction of the tariff for the offtake or injection of additional reactive energy, it is not realist to consider that the technical unit has effectively delivered Q_{req_manual} as average during this quarter-hour. The correction for this quarter-hour should be based on the measured reactive energy production or absorption by the technical unit.
 - *Qinitial and Vstartup:*
 - Can Elia confirm and clarify in the text that for “the last moment in time where the Technical Unit’s Active Power injection or offtake value started to exceed its Minimum Active Power Threshold value”, the exceeding should be considered in average over the quarter-hour ?
 - Qinitial :
 - To improve the readability, we propose to rephrase the condition related to the Setpoint as such : “ [...] or measured at the quarter-hour after a manual Setpoint is reached”
 - Vstartup :
 - Can Elia confirm and clarify in the text that Vstartup is also reinitialized at the quarter-hour after the quarter-hour during which the unit started up, like for Qinitial ?
 - Is Vstartup reinitialized at the quarter-hour following a Setpoint request, or at the quarter-hour after a manual Setpoint is reached, like for Qinitial ?
 - Remuneration principle for a Controlling Technical Unit
 - Qh1 : Qinitial and Vstartup are reinitialized during this quarter-hour. Q_{req} is then equal to Qinitial
 - 2.A.1. The example with the table is very useful. Is it possible to include also a start and a stop of the technical unit ?