

## Proposal for amendment of the T&C BSP aFRR

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### Centrica Business Solutions (CBS) response

18th January 2022

#### Key points

- > Centrica supports the proposal of Elia regarding the specific case of baseline control applied to DPs engaged in FCR energy bids
- > Centrica points out that the process to revise downwards the 20% mark up on the reference price used for the per-CU auction should be more transparent and subject to consultation
- > Centrica asks Elia to continue working on unlocking the aFRR/mFRR combo
- > Centrica renews its claim regarding the need to lower the submetering requirements in order to unlock some aFRR untapped potential

-> Centrica supports the proposal of Elia regarding the specific case of baseline control applied to DPs engaged in FCR energy bids

The solution presented by Elia appears to be workable for most of the cases, as such DPs will likely sometimes not be engaged in FCR bids for a reason or another, letting Elia the possibility to perform a baseline check if needed, and as long as the choice to bid the involved DPs is not hampered. Such a pragmatic solutions does appear to be a better fit than a more structural fix given the limited number of assets for which such a scenario should occur. If that would not be the case, then Centrica would support the development for a more enduring solution if needed.

-> Centrica points out that the process to revise downwards the 20% mark up on the reference price used for the per-CU auction should be more transparent and subject to consultation

Centrica believes that in case the CREG would want to reduce the 20% markup that is applied to calculate the effective reference price for the selection of the virtual bids in the per-CCTU auction, a transparent process with consultation of market parties should be foreseen. Indeed, such a markup has been introduced following a thorough and lengthy process of discussion between all market parties. Would there be any need to decrease, remove (or even increase) it, this should be at the sole discretion of the CREG. Centrica therefore supports any clarification of the current wording in the draft T&Cs going in this direction.

-> Centrica asks Elia to continue working on unlocking the aFRR/mFRR combo

With the increasing participation of new assets in aFRR, aFRR and mFRR combination on the same QH is likely to become more and more of a concrete opportunity for some DPs. Centrica therefore asks Elia to consider options to introduce this feature in the next versions of the aFRR T&Cs.

-> Centrica renews its claim regarding the need to lower the submetering requirements in order to unlock some aFRR untapped potential

As for mFRR, submetering requirements for aFRR are today a concrete blocker for some DPs that could technically provide some aFRR capacity or support. Centrica therefore renews its claim to see Elia revisit the need for such high requirements when it comes to submetering in the balancing services.