

Subject: FEBEG comments on ELIA's public consultation on the study on aFRR activation method

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FEBEG thanks ELIA for having the opportunity to react ELIA's Public consultation on the study on aFRR activation method<sup>1</sup>.

The inputs and suggestions of FEBEG are not confidential.

## General comments

Overall FEBEG welcomes the alternative approach proposed by ELIA for following reasons:

- The proposed solution is **pragmatic and combines the advantages of both approaches** (the control target and the control request based on ramping)
  - In contrast to the "activation methods based on control target", no changes will be required in the principles of settlement, based on requested aFRR and tolerance band. The current T&C aFRR can remain largely unchanged.
  - Only those parties with the ambition to use this option need to make changes to their IT infrastructure.
- The proposal can have a **positive impact on the regulation quality**.
- Proposal does offer **the possibility for more advanced BESS's EMS**.
- Proposal does allow BSP's with faster ramping assets to **better valorise their asset**.

Referring to the possibility of having a separate FAT for the activation and deactivation phase as mentioned in section 4.1, FEBEG is not against this additional option as there are multiple cases where this could be interesting. However FEBEG would like to ensure good comprehension and confirmation on the following:

- The "FAT<sub>energy bid</sub>" will never be considered as selection criterion for the bids in the aFRR auctions
- The "control target" approach will not aggravate the jumps in the activation signals followed by assets which do not have the technical capability to react faster (CCGT's). In fact, the fast regulation of the grid, thanks to fast reaction from assets (FAT < 7,5min), could probably lead to jumps of aFRR signal which is followed by a CCGT during the quarter of hour before the latter reaches the control target.

Complementary, FEBEG cannot commit on when this option could actually be used.

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<sup>1</sup> [https://www.elia.be/en/public-consultation/20221020\\_Public-consultation-on-the-study-on-aFRR-activation-method](https://www.elia.be/en/public-consultation/20221020_Public-consultation-on-the-study-on-aFRR-activation-method)