

Febeliec answer to the Elia consultation on the T&Cs OPA, Sa and the Rules for Coordination and Congestion management in iCAROS phase 1

Febeliec would like to thank Elia for its consultation on the Terms and Conditions for the Outage Planning Agent (T&C OPA), Terms and Conditions for the Scheduling Agent (T&C SA) and the Rules for Coordination and Congestion Management in the framework of the phase 1 of iCAROS project as well as the planning of the implementation of the scope of iCAROS phase 2.

Febeliec has only a limited number of comments on the documents under consultation, as most of its concerns and comments were already treated during the working group meetings and related discussions with Elia. Given the exemption for demand facilities in phase 1 of iCAROS, Febeliec strongly requests in the framework of iCAROS phase 2 to clarify especially for OPA on which level demand facilities have to provide the relevant information (site level, level of the individual installation, asset level, ... as the document mentions that a technical facility equals a technical unit equals a factory on an industrial site, which is of course in integrated sites less obvious), although this presumably and according to the discussions with Elia should at this point not be very different from the practices regarding outage planning which have been in place for many years. Nevertheless, it is important to have a clear understanding of the level of granularity required, so that industrial consumers can efficiently provide the required information.

Concerning coordinability, Febeliec understands that Elia only foresees two categories (coordinable, not coordinable) (in two directions), but nevertheless wants to specify that some of the assets on industrial sites are sometimes only to a limited extent coordinable and should thus under this setting be considered coordinable only while respecting certain strict technical constraints. Especially towards later phases, it might be needed to refine this concept or provide additional guidance for interpretation for demand facilities.

Febeliec in general agrees that penalties should apply if a service provider does not respect the availability plan, the schedule or the redispatch bids as provided by the service provider itself. However, regarding inconsistencies between the data provided by the SA and OPA, Febeliec understands the approach of Elia to apply penalties to both parties as it is indeed difficult for Elia to identify the responsible party for such inconsistency, yet Febeliec insists that a penalties are not applied unduly, specifically in cases where it is clear that no intentional elements were in play.

On Elia's draft proposal of the timeline for the implementation of iCAROS phase 2, Febeliec wants to reiterate its comments made during numerous discussions on the Belgian consumption increase forecast of Elia, which it finds grossly exaggerate as it considers a 50% increase in less than 10 years (by 2032) unrealistic. The Febeliec comments on the document can in no case be considered to validate Elia's assumptions. Concerning the scope of iCAROS Phase 2, Febeliec wants also to reiterate that only data should be requested which is going to be used and which cannot be accessed more efficiently through any other means (in concordance with the use that will made of it, with a trade-off between cost and benefits), as most parties in scope of phase 2 currently have no obligations to provide such data (especially related to schedules) and would thus have to build the necessary infrastructure and processes from scratch, with all the related costs. Hence the need to have a clear check of the added value of such provision of data. In this light, it is very important for Febeliec that the scope definition for phase 2 is conducted in close collaboration with the involved parties and that after a clear and complete scope definition and regulatory and legal approval process sufficient time is given to the involved parties to put in place the necessary infrastructure and processes, again in close collaboration with Elia and if required with other parties, in order to ensure that no parallel information and data flows to network operators should be put in place for the same data. Febeliec also insist that, in light of the potentially large number of involved parties, a scope freeze is applied before any developments have to be done on the site of grid users, to avoid that scope creep and shifting objectives lead to unwarranted cost increases. It is very important to understand that these processes, though core business for system operators, are not so for grid users and should be kept as lean as possible and preferably integrated in the normal investment and development cycles, which requires timely visibility. Moreover, it is important that the costs can be budgeted, as grid users are not monopolistic entities which can easily translate these costs in additional revenues, but rather consider this as yet another additional financial and operational burden which impacts their competitiveness. Last but not least, and related to the above, it is important to ensure that any further iCAROS phases are to the extent possible future-proof related to current legislation as well as legislation under development, to avoid a never-ending process of updates and changes already from the conception phase (see also above on scope creep).

Febeliec represents corporate energy consumers in Belgium for whom energy is a significant component of production costs and a key factor of competitiveness. Febeliec strives for competitive prices for electricity and natural gas for its members, and for more security of energy supply in the context of the energy transition. Febeliec's members are 5 sector federations and more than 40 companies from various sectors (chemistry and life sciences, petroleum products, glass, pulp & paper and cardboard, mining, textiles and wood processing, brick, non-ferrous metals, steel, transportation, construction materials, data centers, telecommunications). Together they represent some 80% of industrial electricity and natural gas consumption in Belgium and 225.000 jobs (www.febeliec.be).

Considering the specific proposed timeline of Elia, Febeliec at this point cannot validate these as it is very difficult to understand the scope and impact of the required changes. However, Febeliec is adamant on the above-mentioned conditions and thus does not want to fix any timeline which could not respect these boundary conditions. In light of the complexities identified for the implementation of iCAROS phase 1, covering a much more limited number of involved parties which already had a wide range of obligations and processes in place, Febeliec is at first glance of the impression that the proposed timelines by Elia are overly optimistic. Febeliec nevertheless as always will strive for a timely implementation of any features that will ensure grid safety and stability at a reasonable cost, yet only under the boundary conditions described above.