

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

As owner of a CCGT (385MW) connected to the CDS grid of BASF Antwerpen – welcomes the possibility to comment on the consultation held by Elia on the T&C OPA and T&C SA. We first want to clarify the specific operational situation of our installation, in which we supply steam to the industrial facilities of BASF Antwerpen (Seveso site). Such steam supply results in a reduction of the electricity produced by the unit. Given the critical nature of steam supply for a Seveso site as BASF's, situations could occur where the steam supply from Zandvliet Power needs to have absolute priority, mainly for safety reasons. This (occasional) limitation on the coordinability of our unit was possible under CIPU with the status "limited coordinable". We noticed that this status is no longer foreseen under the T&C SA.

Considering the specific situation of Zandvliet Power's steam supply (mentioned above) and the very stringent framework foreseen for coordinable units (RTS obligation with high penalties, may-not-run situation with limited compensation etc...) Zandvliet Power will most probably have to decide on a status of "non-coordinable". This as for situations where the steam supply has absolute priority (for safety reasons), the T&C SA do not foresee any means to correctly handle this situation, nor wave the penalties that would occur in case of non-compliance with the Elia instructions (RTS, RD Energy Bid etc.)

We regret that the stringent, penalty focused T&C SA will lead to a situation where units – such as Zandvliet Power – will be forced to reduce their existing (but sometimes limited) flexibility and no longer be available to provide grid supporting services to Elia and the Belgian control area.