

## SeaCoop answer to Elia public consultation task force PEZ.

Elia is organising a public consultation on the topics addressed in the Task Force Princess Elisabeth Zone (PEZ) and SeaCoop would like to thank Elia for the opportunity to give feedback.

As representant of the 106.000 households, SeaCoop would like to stress the socially sub-optimal choices proposed in the report. The main goal of the design should be to bring every kWh of green energy produced in priority to the citizens.

### 1) Connection requirements : grid design

As said in the document, the solution selected by Elia connect the Island to the onshore network “for a total capacity of 3.5 GW”. Knowing that the additional offshore wind farms capacity in the Belgian part of the North Sea ambitious by the Belgium is 3.5GW, it is not possible to find the optimum for the Belgian society while having access RES produced somewhere else in the North Sea.

The grid design proposed by Elia connect 4.9 GW installed capacity to the Island but the transmission to the shore is only of 3.5 GW. This proposition is highly under dimensioned. With this limited capacity of transmission, the grid design exposes the Belgian society and citizens to strong offshore wind energy curtailment when the first goal exposed by the government in the principles of the tender of the Princess Elisabeth Zone is to ensure the highest possible injection of renewable energy into the Belgian grid.

Knowing this, Elia should design a grid that ensure that every produced kWh of the Belgian OWF can be consumed by Belgian citizens and SME’s. For this, the installed capacity connect to the island should always be equal to the transmission capacity to the shore.

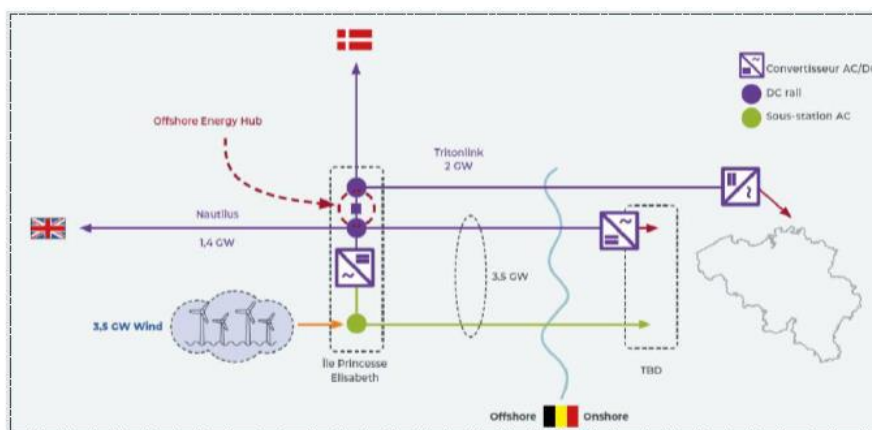


Figure 14 : High-level structure of the Princess Elisabeth Island following the realization of TritonLink and, in a later stage, the Offshore Energy Hub

### 2) Connexion requirements: flexible contract

The flexible connexion contract proposed by Elia for the connexion of 700MW of offshore wind capacity with the possibility for Elia to curtail up to 100%of the production is highly questionable to SeaCoop. The offshore wind development is entirely based on a limited risk guaranteeing the lowest

possible cost for the citizens and the SME's. As said before the curtailment of Belgian offshore energy is not socially acceptable.

Elia should guarantee that the transmission network is able to bring the energy to the citizens at every moment and then allow the PEZ developer to have access to a fixed connection contract by investing promptly in the onshore grid.

This will give the full power to the scheme developed by the government to reduce the strike price and allow the Belgian society to have access to the greatest welfare gains possible. The TSO would then be wholly part of the energy transition efforts.

### *3) Market design: offshore bidding zone (OBZ)*

The market design proposed is studying the possibility, depending on some conditions, to create an Offshore Bidding Zone to foster the competition for the transmission capacity. Elia defends that it could avoid a lot of costly corrective measure or too conservative forecasting. SeaCoop strongly disagree with this view. As said above, Elia should ensure to install enough transmission capacity to ensure the supply of offshore wind energy to the citizens.

An OBZ setting the Belgian OWF in competition for the transmission capacities is once again in opposition with the scheme built by the government. Each percent sell as part of a PPA would be at risk for the developer. The main part of the risk would come-back on the shoulders of the government in the 2-sided-cfd when Elia could as of now decide to review the grid design.

### *4) Balancing design: Ramp rate limitations*

The ramp rate limitation proposed by Elia have an impact on the volumes produced by the OWF, the buyer of the energy. Even if limited, Elia acknowledges that it would also have a financial impact. Knowing that, the burden of the measure should be compensated by Elia for the produced volume sitting under PPA.

Elia expose that this measure will be used even during normal wind speeds. This doesn't seem justified. When the LCOE is highly influenced by the total production of the turbines, the limitation of production should be limited only when needed, under no other circumstances. Otherwise, the strike price could be higher than necessary and so have an impact on the citizens consuming the volumes.

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SeaCoop still want to stress the work done by Elia until here and encourage Elia to consider these comments that will benefit to citizens and the society. SeaCoop is available for further discussions about solutions backing the targets of the Government to ensure the highest possible injection to the Belgian grid and allowing the citizens to consume their own energy via the direct participation in an offshore wind farm.