

Subject: FEBEG response to the Public Consultation on the three modifications of the terms and conditions for the scheduling agent following the return of experience of phase 1 of the ICAROS project

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FEBEG wishes to thank Elia for the very useful REX exercise regarding iCAROS and encourages Elia to repeat this kind of collaborative efforts. The iCAROS project is very important for FEBEG and any further improvements are necessary and very much welcome for the FEBEG members.

General feedback

FEBEG wishes to remind Elia that many of the important points raised during the informal consultation are still valid. Some have been tackled by Elia, for this we are very grateful, however, some issues still remain on the table, as not all of these were included in the formal consultation.

We also have some additional specific elements to raise during this formal consultation.

Specific feedback

We would like to give specific feedback on the below points (cfr. explanatory note).

Consideration of the DP Pmin inj/off within the Return to Schedule control

FEBEG thanks Elia for the proposed modifications which cover the technical requirements of renewable assets. It is correct to assume that a wind park could have sent a schedule below its Pmin and consequently, has no means to correctly execute a return to schedule. Same goes for a thermal (e.g. from standstill to running above Pmin, schedules during ramp up could be below Pmin). In such a case, the return to schedule should be requested to Pmin and not to the last accepted schedule. FEBEG appreciates the amendments of the rules apply for all technology.

Inclusion of the FCR Requested in the return to Daily Schedule control

FEBEG understands the amendments and thinks it is crucial that the general market design remains consistent in case of combo activations (RTS, RD, FCR, aFRR and mFRR). If the service is correctly delivered, this should not lead to a penalty. We ask to be vigilant on the potential impacts this might have on T&C BSP FCR.

Inclusion of new modalities for conditional links enabling specificities for start-up and shut-down RD Energy Bids

FEBEG thanks for this evolution as it is crucial to have the necessary bid characteristics to correctly represent the flexibility available within a portfolio.

We call Elia attention that some other use cases could be identified in the future and want this exercise of return on experience remains possible in the future.

Conclusion

While we appreciate that some improvements have been made, we also regret that not all of the elements put forward by FEBEG members are taken into account in the new (formal) proposal of Elia. Generally speaking, FEBEG members still have some issues which need to be addressed, and which were not in the scope of this consultation. We ask Elia to continue the dialogue with the stakeholders to further improve the overall framework.