

## **Febeliec answer to the Elia public consultation on the Terms and Conditions for the Scheduling Agent following the return of experience of iCAROS phase 1**

Febeliec would like to thank Elia for this public consultation on the Terms and Conditions for the Scheduling Agent following the return of experience of iCAROS phase 1.

Regarding the proposed modifications and as mentioned during all the discussions, Febeliec is strongly of the opinion that in no case these should lead to a reduction in the capabilities for Elia to cope with congestion issues which could jeopardize grid security and/or would lead to increases in the costs of redispatching which would increase even more the already increasing grid tariffs for consumers.

In this light, Febeliec remains not in favor of the integration of a Pmin for generation technologies as it believes that such introduction is not necessary; e.g. already today and without apparently any substantial impact wind operators reduce the generation of their assets, even up to zero, whenever market conditions and/or other regulations (e.g. related to legal requirements on the impact on the immediate vicinity of the assets) require such reductions. Despite many discussions and requests from Febeliec, still no quantified arguments have been presented which would justify the introduction of a Pmin for wind parks or other technologies. Febeliec reads in the explanatory note that for a Pmin the Scheduling Agent shall provide a technical justification, but did not find the scope and extent of this justification back in the Terms and Conditions nor the governance regarding approval (or not) of this justification. Moreover, Febeliec has understood that all asset classes (or even individual assets) would have different thresholds, which would make it on the one hand necessary to define a clear, transparent and non-discriminatory regulated methodology for determining any Pmin thresholds and on the other hand could lead to endless discussions and decisions on such Pmin levels at the detriment of grid security. Febeliec insists that, while as mentioned above no quantitative (or even qualitative) arguments have been presented, this would come with, yet again, an additional burden for Elia and costs to be borne, yet again, by consumers as generation hardly pays any grid fees (and which are moreover capped leading to any cost increases to be shifted towards consumers).

Last but not least, and while not explicitly part of this consultation, Febeliec is adamant that under iCAROS Phase 1 there is an obligation for the concerned assets to provide bids to Elia. Febeliec is not convinced that such bids, which are mandatory, are currently being submitted and request a thorough follow-up of this by Elia and CREG, with complete transparency to all market actors and if required the introduction of additional measures, including penalties, as the omission of these mandatory bids could severely jeopardize grid security.

Additionally, Febeliec noticed that in Annex 13 regarding the contact details for Elia, still the contact details of people who have left Elia in the mean time are included. Febeliec insists that any regulatory document contains correct details and wonders to what extent nominative details are the best approach, taking into account the (numerous and continuous) changes on that level at Elia.