B.new.able

Reaction to the Public consultation on the Proposal for Amendment to the T&C BSP FCR

Bnewable would like to take the opportunity to react to the Proposal for Amendments to the T&C BSP FCR published by Elia in May 2025. We appreciate this opportunity as we believe industry consultations like this are a necessary part of obtaining well-functioning markets and policies. We appreciate the atmosphere Elia creates for honest, well-intended discussions.

Our reaction to this consultation is non-confidential, and we would appreciate its inclusion in the consultation report.

Bnewable appreciates efforts undertaken by Elia to harmonize reporting on FCR and aFRR, among others the switch to a common 4 second reporting granularity and the use of a declarative baseline. We are however against the introduction of yet another test with the new "Baseline test". Prequalifying for FCR is already today an endeavor requiring a significant number of steps/integrations/tests:

- Signing of the FCR contract
- Submission of an Energy Management Strategy per Delivery Point/Group (description + simulation)
- Obtaining the Connection Contract Check (DSO)
- Integration with ICCP/TASE2 for real-time communication (RTCP in the future)
- Conducting the communication test
- Conducting the prequalification test
- Integration with the ATP for the Availability Tests
- Integration with Regelleistung for FCR bidding
- Integration with BMAP for FCR Nominations
- Submission of a simulation for the Reserve Mode

These numerous steps result in an important entry barrier for new players, limiting the number of market parties in FCR and thus the efficient functioning of the market at Belgian level. Adding one more step in the prequalifcation process worsens the current entry barrier.

We would also like to react to the amendments regarding the Continuous Monitoring and in particular the Corridor Approach. Despite our best efforts we feel that the mathematical formulation are hard to understand and sometimes confusing.
For example, on page 101 the Lower Linear Limit (LLL) and Upper Linear Limit (ULL) are defined as functions of LL and UL, without defining LL and UL first. Regarding LLL and ULL, it is also not clear to us why the nested delays (first as τ and then as k, taking first a minimum and then a maximum) are needed.

We define:

- the Lower Linear Limit (LLL):

$$LLL(t;\tau) = \begin{cases} LL(t-\tau) + \frac{\tau-2}{13} * 0.5 * \left(\min_{0\le k\le\tau}\left[FCR_{Req}(t-k)\right] - LL(t-\tau)\right) & \text{if } 3 \le \tau < 15 \\ LL(t-\tau) + \frac{\tau}{15} * 0.5 * \left(\min_{0\le k\le\tau}\left[FCR_{Req}(t-k)\right] - LL(t-\tau)\right) & \text{if } 15 \le \tau \le 30 \end{cases}$$

$$LLL(t) = \max_{3\le\tau\le30}\left(LLL(t;\tau)\right)$$

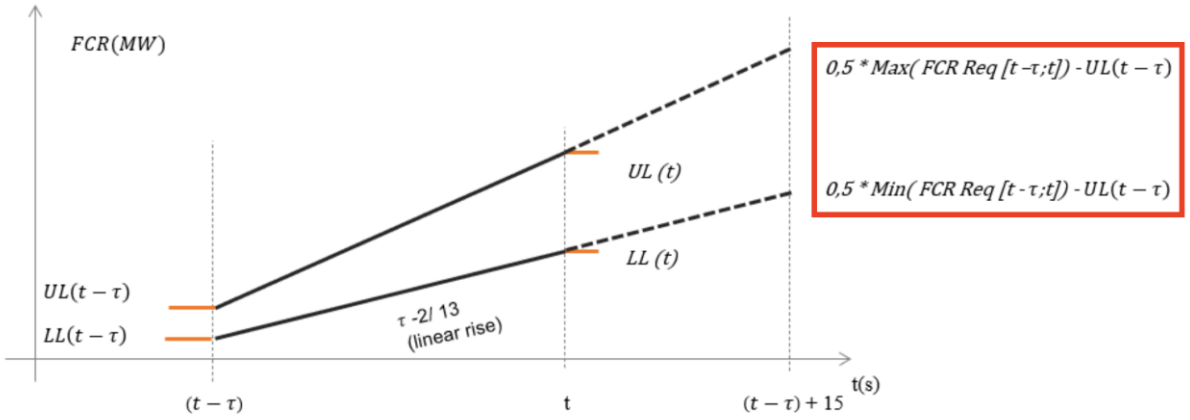
- the Upper Linear Limit (ULL):

$$ULL(t;\tau) = \begin{cases} UL(t-\tau) + \frac{\tau-2}{13} * 0.5 * \left(\max_{0\le k\le\tau}\left[FCR_{Req}(t-k)\right] - UL(t-\tau)\right) & \text{if } 3 \le \tau < 15 \\ UL(t-\tau) + \frac{\tau}{15} * 0.5 * \left(\max_{0\le k\le\tau}\left[FCR_{Req}(t-k)\right] - UL(t-\tau)\right) & \text{if } 15 \le \tau \le 30 \end{cases}$$

$$ULL(t) = \min_{3\le\tau\le30}\left(ULL(t;\tau)\right)$$

Also on p101, regarding the figures:

- We are not sure what is depicted, is it ULL and LLL?
- We are not sure over what index the Min and Max are applied.



Globally, the paragraphs 2.3.1.2 and 2.3.1.3 are quite obscure to us from the mathematical point of view even though we understand the general intention. We have also noticed differences in the formulas between the Explanatory Note and the Amended T&C, which make the understanding harder.

As a BSP we believe it is important that the concepts are clearly defined and understood by FCR suppliers and therefore kindly ask Elia to provide an updated documentation that would be easier to comprehend (with maybe more explanations between the mathematical formulas). We are happy to organize a call to explain in more detail what we are struggling to understand.

Regarding the migration of real-time data exchange to RTCP/Flexhub and the change in granularity, we would appreciate more information from Elia on when this change will take place and the potential parallel run period to better foresee this change in our roadmap.

A last remark is on the Amendments to the Prequalification test phase 1 where Elia proposes to remove the 5 seconds tolerance. This would mark a difference with normal FCR delivery where 2 seconds (or more in case of derogation) are tolerated for assets to start reacting to a frequency deviation (as long as the reaction delay is not artificial). If one takes the Figure “accepted response of FCR Provider to change in frequencies” shared by Elia in the Explanatory Note, the expected reaction at 25% after 7,5 seconds (without the 5 sec tolerance) is above the line separating the green and yellow areas. As such, the FCR prequalification requirements would exceed the FCR delivery requirements. We believe they should remain aligned as the purpose of FCR PQ is to check whether an asset matches the requirements for FCR delivery. Therefore, a reacting time tolerance should be kept in the PQ test.

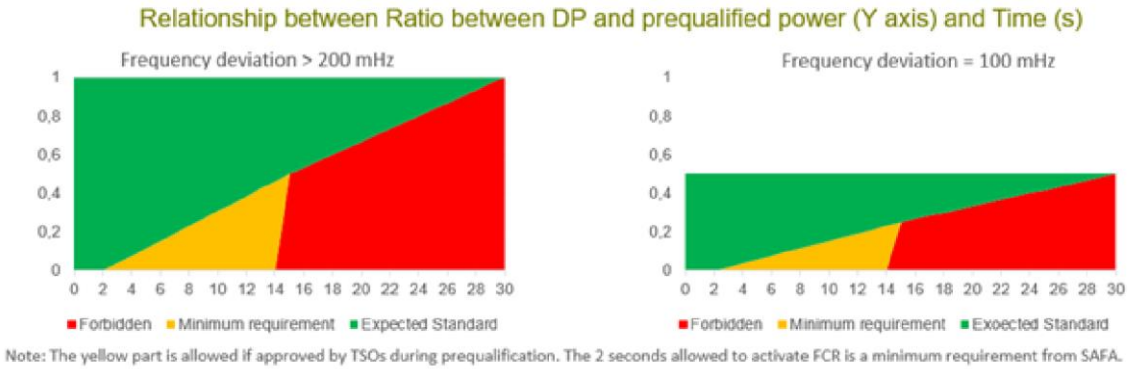


Figure 1:The accepted response of FCR Provider to change in frequencies