

Febeliec answer to the Elia consultation on amendments to the ToE rules in the context of the Synergrid ToE Game Plan

Febeliec would like to thank Elia for this consultation regarding amendment to the ToE rules and unlocking flexibility. Febeliec wants to stress the extreme importance to unlock the possibility to valorize all flexibility in the system, to the benefit of society through lower overall system costs as well as a more secure operation of the grid. Febeliec strongly supports all initiatives which work towards this goal, even though Febeliec finds the progress not fast enough regarding all other rapid evolutions in the energy landscape, including a.o. the issues of incompressibility, balancing needs, ...

Febeliec is strongly in favor of the inclusion of the Corrected Model, and ask to extend it to all voltage levels, including distribution grids, and this as soon as possible to ensure unlocking all flexibility required to face the increasing grid challenges. Febeliec also strongly supports the extension of all ToE solutions to the distribution grid, as well as the extension of ToE to aFRR.

Regarding the proposed go-lives, and as already indicated during previous consultations, Febeliec wants to insist on a greater sense of urgency from grid operators regarding the implementation of any measures that can help unlock the flexibility in all grids. Febeliec wants to point out that grid operators continuously refer to increasing challenges, yet do not seem to speed up sufficiently the implementation of solutions that could help mitigate these challenges and avoid ever-increasing investments (through the so-called CAPEX-bias), which continues to negatively impact consumers invoices and threatens industrial competitiveness. Febeliec finds a timeframe where half of the implementation deadlines are “TBD” unsatisfactory, taking into account that all known timeframes are already extended till end of 2026, meaning (based also on other communications and consultations) an expectation that a roll-out of most ToE solutions on low and medium voltage would extend beyond 2026, without any guaranteed that these would be tackled shortly after. In light of the billions to be invested in grids, any solution which could increase flexibility and lower investment needs should be prioritized, which does not seem to be the case. Febeliec strongly urges all relevant regulators to ensure a higher prioritization and a faster implementation of these.

In title 5, Elia refers to the entry into force of the ToE rules at the earliest on April 1st 2021. Febeliec wonders to what extent this is an error in the modifications, as this date is already several years in the past and thus all rules should be applicable.

In 12.4, Febeliec reads that the order of allocation of compensation volumes is mFRR, DA/ID and then aFRR, where Febeliec wonders why this order is used as aFRR is often considered the balancing service with the highest value. Febeliec wonders whether this approach is chosen to ensure that all volumes are duly delivered, in order to avoid free-riding on the residual balancing of Elia for all subsequent services (after aFRR if it would be allocated first), in which case Febeliec could be in favor. For Febeliec it is essential that services that are contracted and paid for by consumers are also correctly delivered.