



EXPLANATORY NOTE RELATED TO THE PUBLIC CONSULTATION ON THE PROPOSAL FOR MODIFICATION OF THE TERMS AND CONDITIONS FOR THE OUTAGE PLANNING AGENT IN THE FRAMEWORK OF THE RELEASE 1 OF THE PHASE 2 OF ICAROS PROJECT

31/01/2025

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1. Practical information

This note aims to contextualize the documents that are submitted for public consultation by Elia.

At the end of the public consultation, all non-confidential comments will be made public on Elia's website, with an explanation of how Elia responded to these remarks or the reasons why they were not considered. Elia will respect the request for confidentiality and/or anonymity of respondents.

Comments concerning items outside the scope of the documents will not be considered by Elia.

The non-confidential documents submitted for consultation can be consulted on the Elia website.

The official public consultation starting with the documents subject to the public consultation being available in Dutch and French, lasts one month. Reactions must be sent using the online form available on the Elia website and no later than the deadline mentioned on the website.

Questions relative to the consultation can be sent to the following email address: consultations@elia.be.

2. Introduction

In the framework of the iCAROS¹ project, Elia intends to develop efficient and modern processes for the coordination of system relevant assets of grid users and for congestion management in a fast evolving electricity market in order to ensure grid security and compliancy with the applicable legislation (in particular with the requirements from the European regulation System Operation Guidelines – SOGL² and of the national and regional regulations). These processes are necessary for a safe management of the grid by contributing to the mitigation of congestions on the grid, the follow-up of the availability of ancillary services, the monitoring of the availability of power production means to satisfy the demand (including incompressibility issues) and the safeguarding of the operational security. In particular, the evolutions foreseen in the iCAROS project concern the following processes:

1. The **Availability planning** process ensured by the **Outage Planning Agent (OPA)** pursuant to articles 82 to 103 of the SOGL and 125 and 126 of the Code of Conduct. This process corresponds to the provision of availability plans necessary for the efficient coordination of system relevant assets of grid users and the planning of outages of Elia grid assets.
2. The **Scheduling** process ensured by the **Scheduling Agent (SA)** pursuant to articles 46 of the SOGL and 128 and 129 of the Code of Conduct. This process concerns the provision of active power schedules from day-ahead necessary for the coordination of system relevant assets of grid users and provides a necessary input for the assessment of congestion risks on the grid.
3. The **Redispatching** process (costly remedial actions) ensured by the **Scheduling Agent (SA)** pursuant to articles 130 and 131 of the Code of Conduct. This process concerns the provision and the activation of flexibility (active power upwards and downwards) offered by the SA as a means to solve operational security issues on the grid.
4. **The Congestion management process ensured by Elia pursuant to SOGL and CACM³ requirements.**

¹ iCAROS = integrated Coordination of Assets for Redispatching and Operational Security

² SOGL: Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation entered into force on 14 September 2017.

³ CACM: Regulation (EU) 2015/1222 establishing a guideline on capacity allocation and Congestion management

The evolutions of these processes were first described in three design notes⁴ published and consulted in 2017. Following discussions and agreements with market parties, the implementation of the iCAROS design has been split in different phases reflecting the operational prioritization. The first phase of iCAROS was finalized in May 2024 and lead to evolutions⁵ of three regulated documents (T&C SA, T&C OPA and Rules for Coordination and Congestion Management). The second phase of iCAROS has been split in two steps with different releases in order to allow a realistic implementation. At the moment the following releases are proposed:

- **Step 1:** Evolutions related to the availability planning process for TSO (and CDSO connected to TSO grid) connected technical facilities and DSO connected production and storage facilities and Congestion Risk Indicators (CRI)
 - **Release 1:** Implementation of the full design related to availability planning process for TSO connected production and storage facilities with an installed capacity larger than or equal to 25 MW
 - **Release 2:** Extension of the CRI to local (< 150 kV up to 36/30 kV) and DSO grid
 - **Release 3:** Implementation of the full design related to availability planning process for TSO (and CDSO connected to TSO grid) and DSO connected production and storage facilities with an installed capacity larger than or equal to 1 MW, as well as for TSO-connected demand sites.
- **Step 2:** Evolutions related to scheduling and redispatching processes for TSO (and CDSO connected to TSO grid) connected production and storage facilities as well as scheduling process for TSO connected demand sites.

In the framework of the Release 1 described above, this explanatory document supports the public consultation of the updated version of the Terms and Conditions for the Outage

⁴ Available on the Elia website :

- for scheduling and redispatching: <https://www.elia.be/-/media/project/elia/elia-site/electricity-market-and-system---document-library/outage-planning-and-scheduling-agents/2018/2018-design-note-icaros-future-scheduling--redispatching.pdf>
- For availability planning: <https://www.elia.be/-/media/project/elia/elia-site/electricity-market-and-system---document-library/outage-planning-and-scheduling-agents/2018/2018-design-note-icaros-future-outage-planning.pdf>
- For Congestion Risk Indicator: <https://www.elia.be/-/media/project/elia/elia-site/electricity-market-and-system---document-library/congestion-management-and-redispatching/2018/2018-design-note-icaros-future-congestion-risk-indicator.pdf>

⁵ Described in the following document on the Elia website: https://www.elia.be/-/media/project/elia/elia-site/electricity-market-and-system/system-services/alleviating-congestion-risks/20240402_tc-opa-sa-coordination-rules-explanatory-document_en.pdf

Planning Agent (T&C OPA) concerning the evolutions related to the availability planning process for TSO (and CDSO connected to TSO grid) connected production and storage facilities with an installed power larger than or equal to 25 MW. In parallel to this evolution but in a separate process, a design note describing the extension of the availability planning process to the TSO and DSO connected production and storage facilities with a power between 1 and 25 MW as well as TSO connected demand sites will be written (in the framework of Release 3). This note will be shared with market parties to collect feedback in the loop of Q1/Q2 2025.

In addition to the section regarding practical information and the introduction, this note is composed of four other sections:

- Section 3 provides a repetition of the data concepts relevant for the availability planning process.
- Section 4 describes the evolution of the availability planning process for the facilities with a power equal to or above 25 MW that have led to the modifications of the T&C OPA.
- Section 5 describes a proposal of harmonization of the data flows used by market parties in the framework of the availability planning and in the framework of the obligations related to Transparency and REMIT processes as well as the impact on the OPA contract. However, this section does not include the non-regulated contract for the delivery of outages and market information publication⁶ that is a prerequisite if a market party wants to use the service of Elia as service provider for REMIT obligations. This contract is not in scope of the current public consultation given it is not a mandatory consequence of the signing of the OPA contract.
- Section 6 provides a summary of the sections of the OPA contract that have been adapted.

The consulted documents are the final version of the T&C OPA in Dutch, French and English and the final version of the OPA contract with track changes compared to the version of the OPA which is into force. For significant changes in track changes in the English version of the T&C OPA, an explanation is given in this note.

⁶ https://www.eliagroup.eu/-/media/project/elia/shared/documents/elia-group/elia-group-ijp/20210923_contract_transparency-services.pdf

3. Terminology used in the framework of the iCAROS design for availability planning

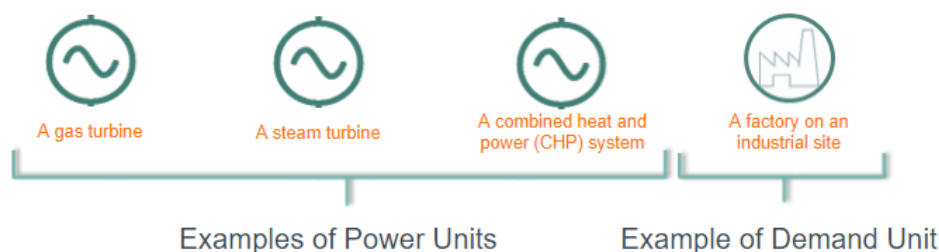
Some new data concepts have been introduced with the go-live of iCAROS phase 1 that are applicable for availability planning. The data concepts relevant for availability planning are repeated below.

Technical Units (TU)

A technical unit is a device or aggregation of devices connected directly or indirectly to the synchronous electrical network that produces and/or consumes electricity.

A technical unit can be:

- A power unit (PU)
- A demand unit (DU)



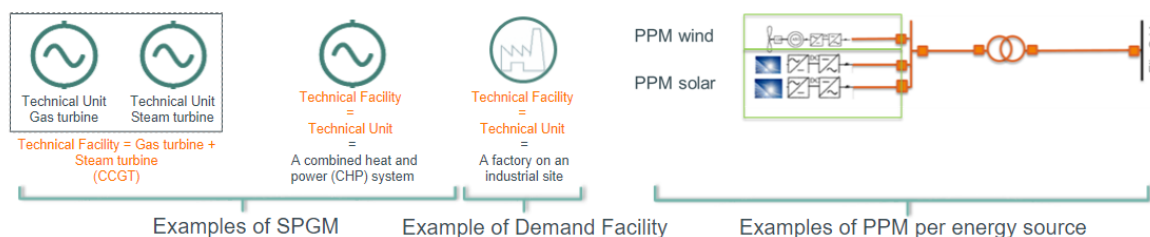
Technical Facility (TF)

A technical Facility is a complete set of technical unit(s) which are operationally linked and which, combined together in one or several operating modes, can consume or generate electricity on its own.

A technical facility can be a:

- Synchronous Power Generating Module (sPGM)
- Power Park Module (PPM) **per primary energy source**, i.e. the aggregation of all the components of the Power Park Module (as defined in NC RfG⁷) but contrary to the notion of PPM from the RfG, Elia introduces the notion of **PPM per primary energy source**. This means that if different PPMs are connected behind the same access point and use different primary energy source (e.g. one wind power park and one solar power park), two different PPMs per primary energy source are defined behind this access point.
- Demand Facility (DF)

⁷ RfG: The Commission Regulation (EU) 2016/631 of 14 April 2016 establishing a network code on requirements for grid connection of generators;



The technical facilities that have some energy limitations (the Energy Storage Devices (ESD) such as batteries or pump-hydro storage) are considered as either sPGM or PPM with Limited Energy Reservoir (LER).

The technical facility is the level at which the availability planning **obligations** is defined. For example, a technical facility (sPGM) with a maximum installed power of 40 MW, which is composed of two technical units with a maximum power of 20 MW, is obliged to participate to these services as the obligation is at the level of the technical facility which has a maximum installed power higher than 25 MW.

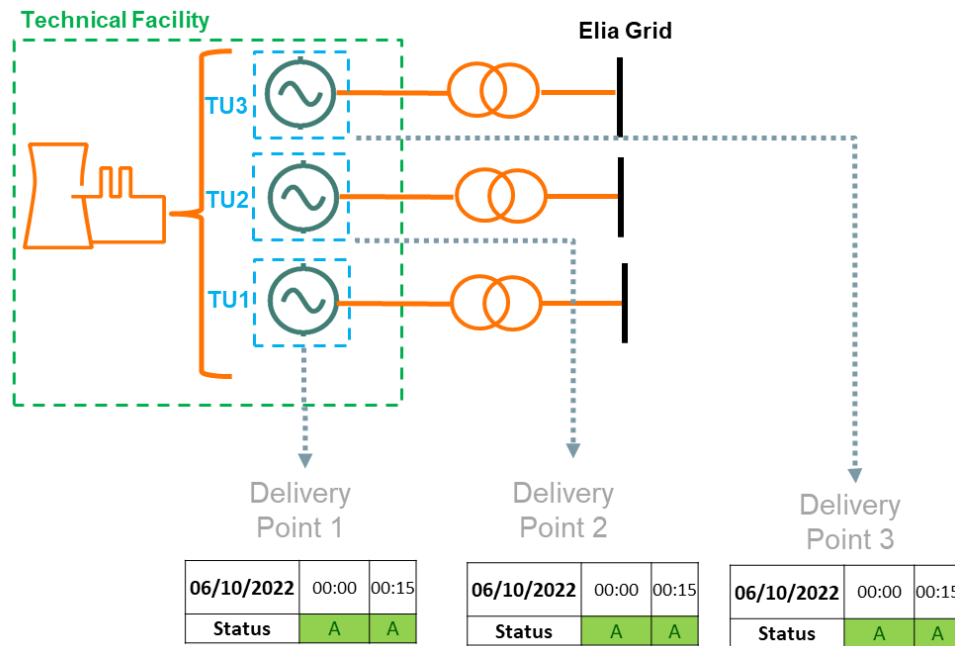
Delivery Point (DP)

The definition of a delivery point is: a point on an electricity grid or within the electrical facilities of a grid user, where a service is delivered. This point is associated with one or several metering(s) and/or measures, according to dispositions of the contract related to this service, which enable(s) ELIA to control and assess the delivery of the concerned service.

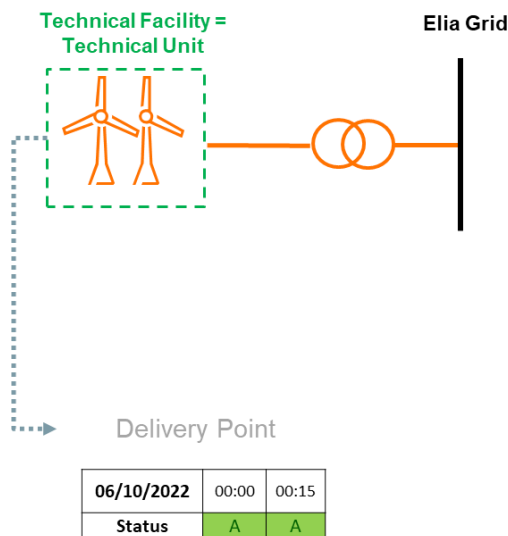
Elia introduces this concept to precisely define the point at which the availability plans have to be provided. This concept also allows performing quality and coherency checks of data. The rules to define the delivery point are described in the OPA contract. An important rule is that the **delivery points related to a given technical facility/technical unit defined in the T&C OPA for the availability planning process have to be identical to the ones defined in the T&C SA for the scheduling and redispatching processes.**

Examples

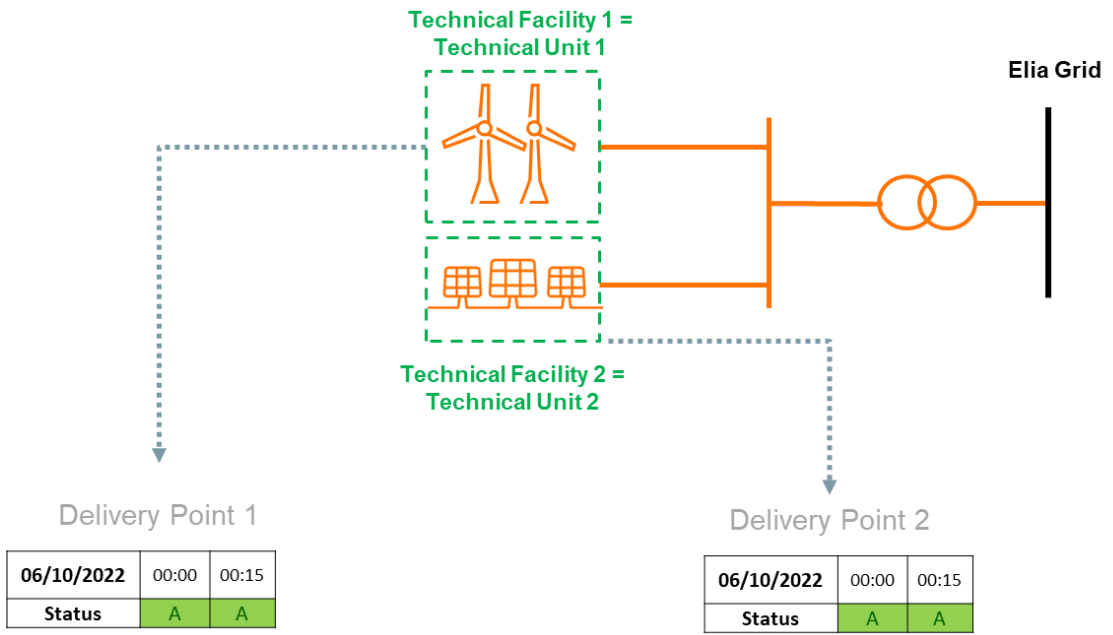
1. The figure below illustrates the situation of a **CCGT** (Combined Cycle Gas Turbine) which is a synchronous Power Generating Module composed of three technical units: two gas turbines and one steam turbine. Three delivery points are defined at the level of the TUs and correspond to the points at which the data (in this example: availability statuses) need to be delivered as shown in the figure below.



2. The figure below illustrates the case of a **wind park** which is a Power Park Module (PPM) whose primary energy source is wind. The delivery point for the provision of the availability statuses is defined at the level of the technical unit (which is by default also the technical facility as it is a PPM)

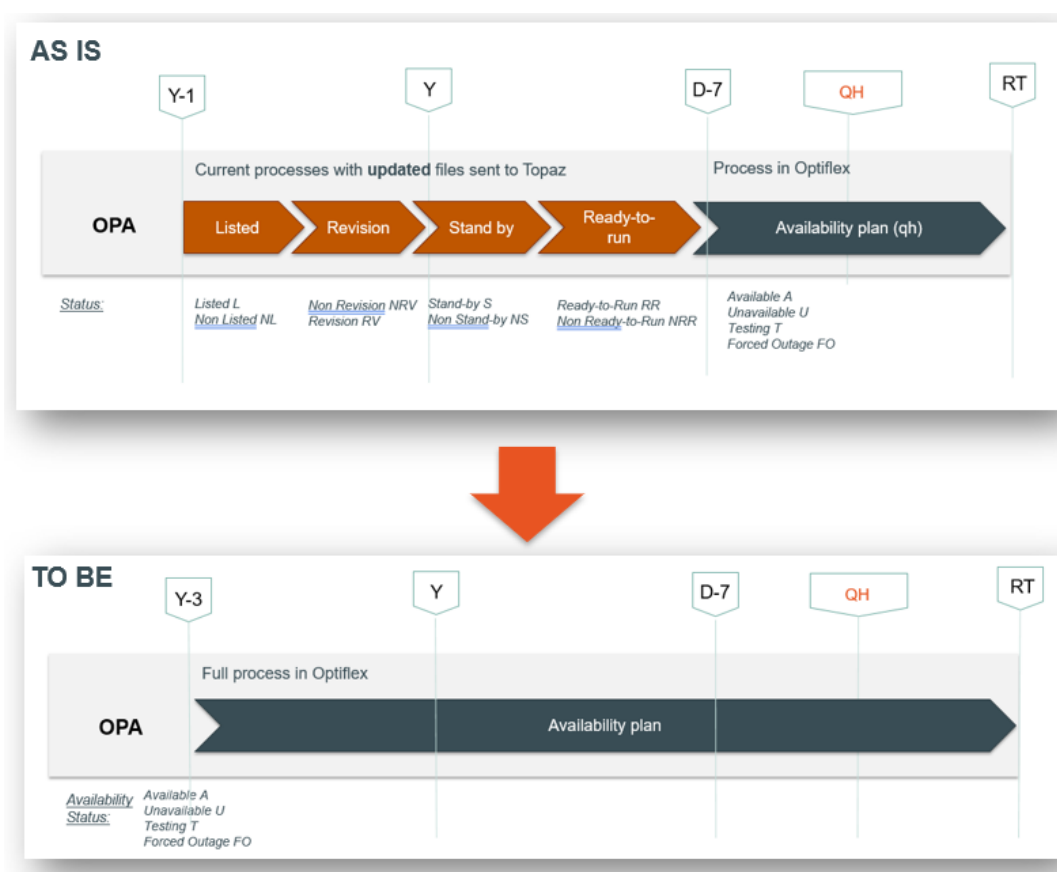


3. The figure below illustrates the case of a **wind park** which is a Power Park Module (PPM) whose primary energy source is wind and a **solar park** which is a PPM whose primary energy source is the sun. Both PPMs are **connected behind the same access point to the Elia Grid**. In this case, two different technical facilities are defined as the wind park and the solar park have different primary energy sources. A delivery point for the provision of the availability statuses is defined separately for each technical facility at the level of the technical unit.



4. Evolutions of the Availability Planning process for production and storages facilities with a power higher than (or equal to) 25MW

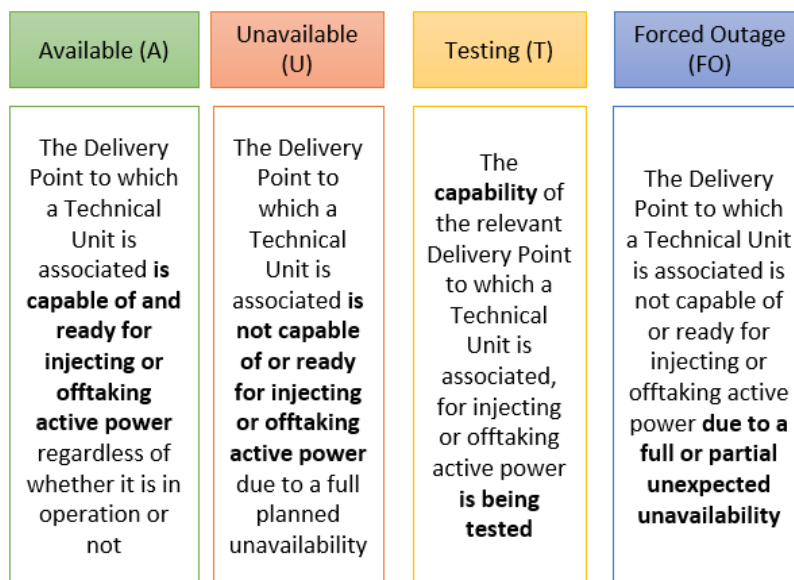
In line with the CREG decision B2751⁸ and VREG decision⁹ related to the regulated documents in the scope of the phase 1 of iCAROS, Elia proposes some evolutions of the availability planning process for the production and storage facilities with a maximum technical power of 25 MW or higher. These evolutions consist in introducing a simplified process to provide the information about the availability of technical facilities by removing the existing procedures from year-ahead to week-ahead (Listed, Revision, Stand-by and Ready-to-run) in which data are submitted at certain fixed “gates” in time and replacing them by a continuous process for the provision of information (“Availability Plan process”). This means that the availability information for a technical facility should be provided by the OPA at a first moment in time (as described below) and updated if and as soon as the OPA decides to implement a change of availability of one or more delivery point(s) associated to this technical facility. The high-level evolution of the process is represented in the figure below and explained in detail in the next sections.



⁸ <https://www.creg.be/nl/publicaties/beslissing-b2751>

⁹ [besl-2024-35_beslissing_tot_wijziging_besl-2024-10.pdf](#)

As a consequence of this process evolution, the current “Availability Plan” procedure starting at the end of the week-ahead process is extended to the full-time horizon covered by the availability planning process. This also means that the “old” availability statuses¹⁰ are replaced by the four availability statuses, namely Available (A), Unavailable (U), Testing (T) and Forced Outage (FO) as defined in the SOGL and described in the figure below.



In the framework of the availability planning process, the OPA has to provide to Elia for all delivery points in its portfolio, an availability status (A, U, T or FO) and a corresponding maximum power available (P_{max_avail}) as described schematically below. The time granularity of the information is dependent on the moment of provision as further described in the following sections.

		00.00	00.15	00.30	00.45	01.00	23.00	23.15	23.30	23.45
OPA	Availability plan status	A	A	U	U	U		T	T	T	A
	P_{max_avail} (MW)	100	100	0	0	0		20	50	80	100

In case the OPA needs to indicate a partial unavailability of a delivery point, it has to submit:

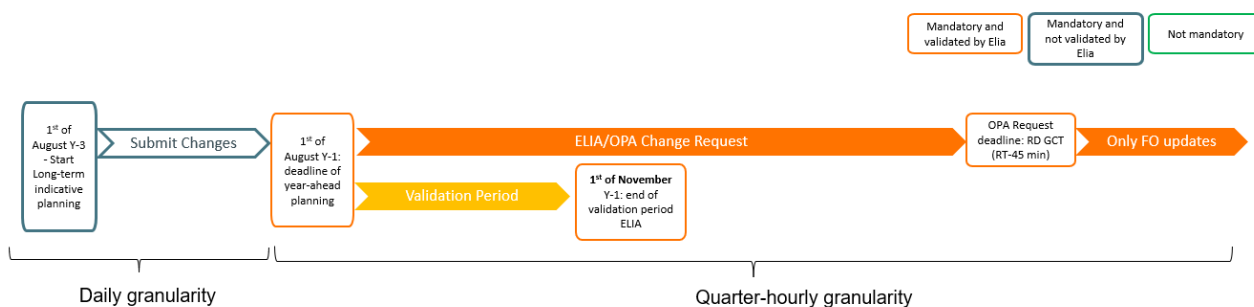
- For a planned partial unavailability: a status “Available” with a P_{max_avail} lower than the technical Pmax of the delivery point
- For an unplanned partial unavailability: a status “Forced Outage” with a P_{max_avail} larger than 0 MW.

¹⁰ The old statuses are related to 4 processes given in chronological order: Listed (Listed (L) versus Non Listed (NL)); Revision (Revision (RV) versus Non Revision (NRV)); Stand-by (Stand-by (S) versus Non Stand-by (NS)) and Ready-to-Run (Ready-to-Run (RR) versus Non Ready-to-Run (NRR)).

Note that from an implementation point of view (see section 4.4), Elia considers that a delivery point is Available unless stated otherwise. The OPA is thus expected to indicate when the delivery point is **unavailable (in testing/forced outage/planned outage)** through the provision of an unavailability event of a certain duration. This event can be shortened, prolonged or cancelled when updated.

4.1. Evolution of availability planning process

The new process to provide availability plan to Elia is represented on the figure below



4.1.1. Multi-year ahead planning

In accordance with the article 93 of the SOGL, a multi-year ahead provision of data is introduced as from Y-3. The OPA is requested to provide an indicative availability plan for the year Y as from 1st of August Y-3. This is indeed an important input for the optimization of Elia’s operational planning for specific cases with a multi-year context (e.g maintenance of grid elements that needs to be planned in the next three years) as well as for adequacy and availability of ancillary services (e.g. incompressibility studies). At this stage, this is mainly relevant for Elia to know if a maintenance of a technical facility is planned in year Y as well as a high-level indication of the period. Consequently, a daily granularity of the information is sufficient and this plan is not subject to Elia’s validation. This means that the indicative availability plan can be updated by the OPA until the deadline to provide the year-ahead availability planned as explained in the next section. Elia still considers the possibility to contact the OPA if inconsistencies between the OPA’s availability plan and Elia’s own multi-year ahead maintenance planning are detected in order to pro-actively try to find a solution.

Note that the actual obligation from Transparency regulation concerns only production and storage facilities with a power higher than (or equal to) 100 MW but Elia proposes to extend this obligation to all production and storage facilities with a power higher than (or equal to) 25MW to cover the needs related to the multi-year ahead operational planning.

For new commissioned units the information to be given at first connection as specified in Article II.10.2 focusses on the information requiring a validation of Elia.

4.1.2. Year-ahead planning and validation period

At the latest on the 1st of August Y-1, and similarly to the current process, the OPA has to provide the availability plan for the year Y for the different technical facilities (at delivery point

level) in its portfolio. This information is used by Elia to prepare the year-ahead outage planning of Elia's assets as well as for seasonal adequacy and availability of ancillary service (e.g. incompressibility studies). Contrary to the multi-year ahead availability plan, the year-ahead availability plan is subject to Elia's validation i.e. the last version of the availability plan that is available on the 1st of August Y-1 is accepted by Elia but a change request (as described below) can be issued in case grid security issues¹¹ are detected. This security check is made during the "validation period" that ends on the 1st of November Y-1 which is the deadline for Elia to give an answer to the OPA.

Concerning the granularity of the information, Elia proposes a quarter-hourly granularity so that this is coherent through the full Availability Plan process (from Y-1 to day-ahead/intraday at the moment schedules are provided by the scheduling agent). Note that the granularity to provide the availability information is actually quite flexible in the tool used to exchange data with Elia (as described in the section 4.4 of this note).

4.1.3. OPA change request process

After the deadline to provide the year-ahead availability plan, the OPA has the possibility to request a change of its initially provided information. Any **updates of availability plan (availability status and/or Pmax available) by the OPA has to be communicated to Elia as soon as they are decided by the OPA**. This is allowed by the evolution of the process that introduces the possibility to continuously provide updates of data and removes the need to wait for specific gates to provide information to Elia.

When receiving an update of the availability plan, Elia analyses the compatibility of this change with its own maintenance plan and assesses the risk for the security of the grid as defined in the Article 4 of the Rules for Coordination and Congestion Management. Elia validates the OPA change request by providing one of the following statuses:

- **Accepted** if the change request does not create any incompatibilities with the outage of grid elements nor creates an issue for the grid security.
- **Rejected** if the change request creates an incompatibility with the outage of grid elements or represents a risk for the grid security for which no solution can be found
- **Accepted on the condition that associated costs are compensated** if the change request creates an incompatibility with the outage of grid elements or represents a risk for the grid security for which an alternative solution can be found by Elia but with associated costs (e.g. rescheduling some works on the grid)

¹¹ Resulting from the compatibility check with the maintenance plan of Elia's assets, adequacy check or availability of ancillary service check as defined in the Article 4 of the Rules for Coordination and Congestion Management. Although not explicitly mentioned in Article 4 of the Rules for Coordination and Congestion Management, Elia also performs a compatibility check for incompressibility and in case of grid security issues, this check can also lead to a refusal of a change request or a new request by the OPA after the Y-1 deadline. This check will be explicitly added in the next version of the Rules for Coordination and Congestion Management.

Elia provides an answer to the OPA within the timings defined in the OPA contract. It is important to note that the sooner the change request provided to Elia the better the probability of an acceptance as it gives more time to Elia to assess acceptable solutions in case of incompatibility/grid security issue. To handle the change request of the OPA, Elia has an operational team available 24/24 7/7 that gives priority to change request linked to a time horizon D-2. As such in practice the approval for changes without any operational security risks feels like automatic acceptance.

In case of rejection of a change request, Elia provides the following information to the OPA :

- The reason of the rejection
- The specific moment(s) for which an incompatibility/grid security issue has been detected within the period covered by the OPA change request so that the OPA can take this information into account when submitting a new change request.

As mentioned by some market parties during the iCAROS workshops, a rejection of a change request is not always feasible in case of an extension of an ongoing maintenance due to e.g. an unexpected issue occurring during the planned maintenance period. Based on this feedback, Elia foresees in the OPA contract that no rejection can occur in case of a prolongation of an ongoing maintenance. To avoid misuse of this process, Elia proposes a maximum prolongation of five days on which market parties feedback is welcome.

4.1.4. Elia change request process

After the provision of the year-ahead availability plan, Elia has the possibility to request a change of the availability statuses provided by the OPA for a certain period. These requests can only concern a change from a status Unavailable or Testing to a status Available. Elia indeed cannot request a delivery point to be unavailable i.e. to be not in state of injecting/offtaking electricity. Elia has still the possibility to request a may-no-run to the scheduling agent if a delivery point is requested not to produce during a certain period. On the contrary, Elia should have the possibility to request a change to Available if the unavailability of the delivery point creates a risk for the grid security.

Such Elia change requests are possible from the start of the validation period (cfr section 4.1.2) to the deadline to request a must-run or a may-not-run to the scheduling i.e. currently 5 working days before the day for which the change is requested.

When receiving a change request from Elia, the OPA has three possibilities:

- **Accept the** change request
- **Reject** the change request if it is technically not feasible. The OPA has to provide a reason for this rejection.
- **Accept the change request on the condition that associated costs are compensated** if the change request is feasible but creates some costs due to e.g. rescheduling (part of) the work related to the maintenance of the unit

In order to let enough time for Elia to assess the consequences of the OPA's answer to the change request (and find alternative solutions if necessary), the OPA is expected to answer to the Elia's change request withing the following timings:

- 5 working days if the change is requested at the latest 7 days before the day for which a change is requested
- 3 working days if the change is requested later than 7 days before the day for which a change is requested

4.1.5. Price offers

When a change request is accepted by Elia or the OPA on the condition that associated costs are compensated, the accepting party has to provide a financial offer to the requesting party. These costs should be:

- **Reasonable** i.e. they reflect an additional cost or loss of revenue that cannot be recovered or remunerated elsewhere, based on available information at the moment of the submission.
- **Demonstrable** i.e. the party charging the cost must be able to justify the amount by supporting information of a reliable source (invoices, price offers of a contractor, reference prices, ...), which must be kept at disposal for the CREG and for ELIA.
- **Directly related to the request** i.e. the cost would not have been incurred if the request for change had not taken place.

The price offer is used by the requesting party to assess if the change request is maintained or if an alternative solution should be preferable.

4.2. Testing status

In accordance with articles 92, 101 and 103 of the SOGL, the OPA has to provide information about the planification of a test related to the capability of a technical unit in its portfolio for injecting and/or offtaking active power. Elia specifies that only the tests that are performed at the request of the OPA (or the Grid User) have to be indicated. Any tests resulting from a request from Elia in the framework of the provision of an ancillary service (balancing, black-start etc) should not be indicated in the availability planning process.

Concretely, when planning a test, the OPA has to provide to Elia the following information at least **one month before the start of the test**:

- A **Testing status** with a Pmax available during the test period corresponding to the maximum power that is expected to be injected during each quarter-hour of the test
- The **reason** of the planned test

The provision of this Testing status and corresponding Pmax available is always to be validated by Elia.

A Testing status is similar to an Available status except that no ancillary services and congestion management services (redispatching) are expected to be provided i.e. no balancing or redispatching energy bids are expected to be submitted. The obligations related to the scheduling process of course still apply.

Concerning the execution of the test, whose modalities are not in the scope of the OPA contract,:

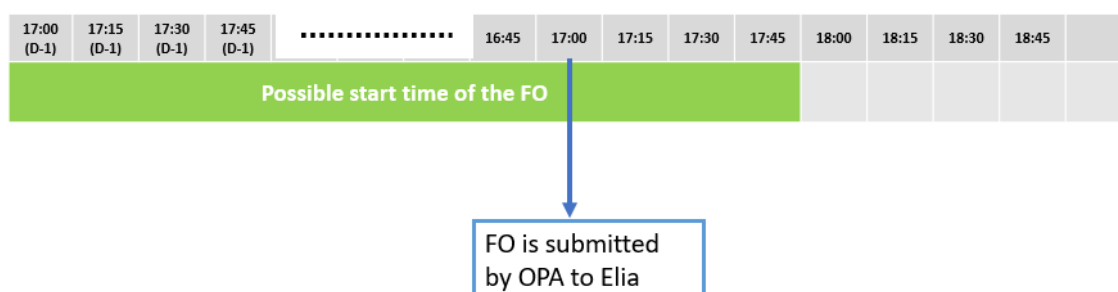
- As from day-ahead 3 PM before the test, the Scheduling Agent has to provide a schedule for the test period as well. As an exception to the freedom of dispatch, this schedule related to a “Testing” status has to be validated by Elia. These modalities will be later described in the SA contract.
- A Test can **be canceled in real-time by Elia** if strictly needed for operational security reason. A cancelation of a test in real-time should be quite exceptional but Elia insists on a good coordination of the test in advance as it still reduces the risk of real-time cancelation.

4.3. Forced Outage status

The Forced Outage (FO) status is defined to handle unexpected partial or full unavailabilities preventing a delivery point to inject/offtake active power in agreement with article 127 of the Code of Conduct. The definition of a FO, coming from the SOGL, has been detailed in the updated OPA contract to state more precisely what is intended by an “unplanned removal from service”.

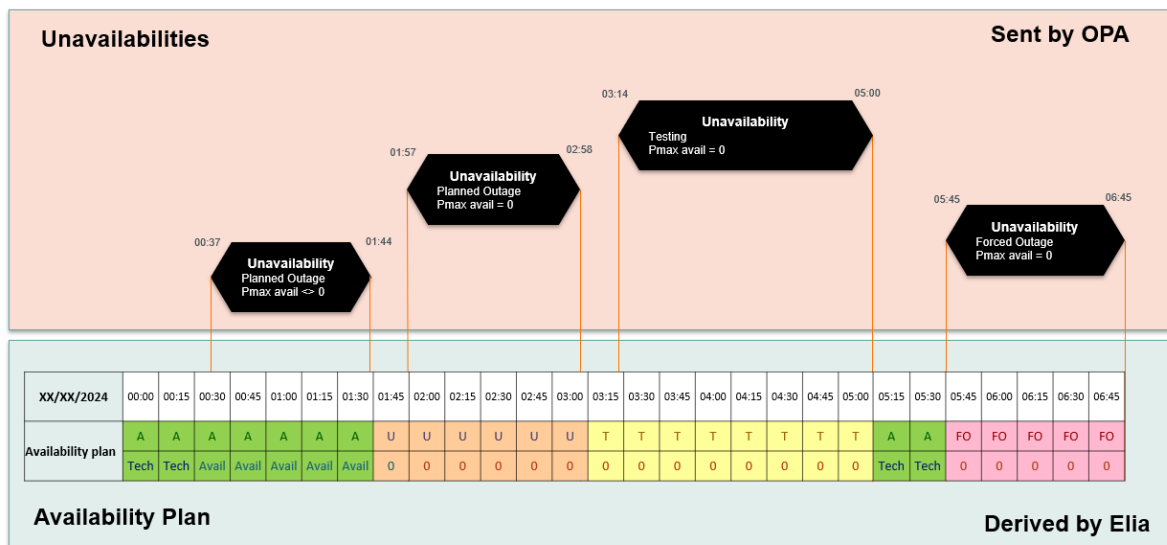
This status is also introduced to be compliant with Transparency regulation (EU Regulation 543/2013) that requires a specific distinction between planned and unplanned unavailabilities when publishing information on the ENTSOe Transparency Platform. To ensure coherent processes and avoid parallel ways to communicate information (see also section 5 in this note), the existence of a specific status for unplanned unavailability is necessary.

The update of availability plan due to a forced outage follows specific validation rules due to the unexpected and not controllable nature of the event. These rules are described in the relevant section of the T&C OPA. Following the feedback given by market parties related to the timings to declare a FO, Elia adds the possibility to declare a FO starting from an upcoming quarter-hour for which the Redispatching Gate Closure Time (RD GCT) has passed (and not only starting from the quarter-hour in which the FO is declared or before as currently implemented). This means that the start of a FO can be declared as from 45 min in advance in case the OPA is aware of a non-controllable technical issue that will take place in a near future. Elia proposes this to answer market parties needs while still limiting the use of FO process to the quarter-hours for which an availability status change to “unavailable” or a reduction of Pmax available cannot be requested anymore (i.e. after the RD GCT has passed).



4.4. Provision of availability plan - Implementation impact

The provision of information in the framework of the availability planning process is also impacted by the evolution of the process as described in the previous sections. As a consequence, the current excel templates to provide information to Elia until the week-ahead timeframe (included) will no longer be used and the provision of information will be made via the provision of **unavailability events**. This means that the OPA is expected to only provide the period(s) for which the delivery point is unavailable (in testing/forced outage/planned outage) through the provision of an unavailability event of a certain duration (as shown in the figure below). This event can be shortened, prolonged or cancelled when updated. Elia will deduct the availability plan of a given delivery point from the unavailability event(s) provided by the OPA.






As stated in section 4.1.1, the first provision of availability plans for the year Y is expected as from 1st of August Y-3. As request by market parties during the workshops, but also considering a technical limit to avoid an overload of data, unavailability events will also be allowed for a further period in time if available. This concretely means that the start date of an event should be at the latest in year Y+3 and the end date of the event is limited to year Y+5.

More technical information about the provision of availability planning information is available on the technical guide that is published on the Elia website([iCAROS and MARI projects](#)¹²)

¹²[https://urldefense.com/v3/ https://www.elia.be/en/electricity-market-and-system/icaros-and-mari-projects;!!La4veWw!wb1fi_ruzauB8ntzeLRpznXpiVNd0V5s_i5f6wcS_hhykWmfzKD4YloOpL0iTd4P7hRRnDVXjN-ejiPEeJO2rgHpwdlISw\\$](https://urldefense.com/v3/https://www.elia.be/en/electricity-market-and-system/icaros-and-mari-projects;!!La4veWw!wb1fi_ruzauB8ntzeLRpznXpiVNd0V5s_i5f6wcS_hhykWmfzKD4YloOpL0iTd4P7hRRnDVXjN-ejiPEeJO2rgHpwdlISw$)

Example of the provision and update of unavailability events:

<p>1. On 1st August Y-3, the OPA knows that a maintenance of about 10 days will be necessary in year Y around Q2 → OPA provides a first unavailability event for year Y that is acknowledged by Elia</p>	
<p>2. On 1st August Y-1, the OPA confirms this maintenance and has more detailed information on the exact timings of the outage to provide → OPA updates its previous unavailability event</p>	
<p>→ On 1st November Y-1, Elia confirms that this availability plan does not create grid security issue and no change is requested</p>	
<p>3. On 15th November Y-1, the OPA provides an update of the availability plan</p> <p>→ On 1st December Y-1, Elia accepts the update</p>	

5. Harmonization with Transparency and REMIT processes

5.1. Publication of unavailabilities of technical units

Some market parties have the obligation to publish information about the unavailabilities of their technical facilities (information delivered at delivery point level) according to the following legislations:

- The Transparency legislation¹³ (Article 15) for publication on the ENTSO-e Transparency Platform (ETP) - Applicable to the primary owner of the data
- The REMIT legislation¹⁴ (Article 4) for publication on an Inside Information Platform (IIP) - Applicable to market participants

In line with Article 4 of the Transparency legislation, Elia publishes the data on ETP except if the primary owner of the data notifies Elia that a third party provides the data on ETP on its behalf. Concerning REMIT obligations, Elia can act as data provider for the publication on its IIP on request of the market parties via the signature of a contract (IIP contract that is available on the Elia website: [Elia Group IIP Contact Form](#)). In parallel, Elia also publishes the unavailabilities of technical units on its own website.

The provision of information to perform these publications is currently a parallel process to the provision of availability plan to Elia in the framework of OPA process i.e. it takes place via a separated data flow (using the tool “Transprod”).

To improve the data consistency and simplify the provision of the same information for different processes, Elia proposes to use the data provided by the OPA as the source for the publications on ETP, Elia website and IIP. Elia proposes the following approaches:

Approach for publication on ENTSO-e Transparency Platform (ETP)

In line with the Transparency legislation, Elia proposes to **by default publish the data** received from the OPA at delivery point level in the following cases:

- Planned unavailability, changes in actual availability or change in planned unavailability of 100 MW or more of a technical unit expected to last at least one quarter-hour
- Planned unavailability of a technical facility of 200 MW or more including changes in actual availability or in planned unavailability of 100 MW or more expected to last at least one quarter-hour and not already published at technical unit level

¹³ Commission Regulation (EU) No 543/2013 of 14 June 2013 on submission and publication of data in electricity markets

¹⁴ Regulation (EU) No 1227/2011 of 25 October 2011 on wholesale energy market integrity and transparency) amended by the Regulation (EU) 2024/1106 of 11 April 2024

except if Elia is notified that another party is formally data provider on ETP for the publication related to Article 15 of Transparency regulation for this facility.

This approach has been described in the OPA contract (new Title 8) and is in line with article 18 of the Rules for Coordination and Congestion Management.

Approach for publication on ELIA website

Elia could continue to publish the data received from the OPA for all technical facilities without considering any thresholds related to the size of the technical facilities.

While this approach seems feasible for Elia, Elia is open to any feedback from market parties concerning the need and added value of these publications on the Elia website as well as the possibility to introduce a threshold related to the size of technical facilities for the publication.

Approach for publication on Inside Information Platform (IIP)

In REMIT regulation and associated ACER guidance, the production and storage planned and unplanned unavailabilities are an information which should be considered as an inside information if the following criteria are fulfilled: the information is of a precise nature, which has not been made public, which relates, directly or, indirectly, to one or more wholesale energy products and, which, if it were made public, would be likely to, significantly affect the prices of those wholesale energy products. There is no reference to a specific threshold in MW in the above criteria. The market parties must identify for which technical facilities they would like to publish an availability plan on IIP.

Market parties that want to publish on Elia IIP still have to sign an IIP contract with Elia. Elia proposes to define two options for these parties in the framework of the IIP contract:

1. Elia publishes the data provided by the OPA for the technical facilities indicated by the market party in the IIP contract. This option is only possible if the OPA signs the IIP contract with Elia;
2. Elia publishes the data provided by the market party (or a third party designated by the market party) via another channel (e.g. specific APIs)

The above proposed approach does not require a modification of the OPA contract but can only come into force after modification of the IIP contract. Given this is a non-regulated document the formal public consultation process does not apply.

However, the implementation of option 1 has a light implementation impact on the data flow for the provision of availability planning in order to allow the possibility to merge the IIP and OPA data flows. If additional information needs to be collected in the framework of the REMIT processes (e.g. reasons of unavailability or additional fields that can be filed in in the framework of publications on IIP) but is not strictly needed in the framework of the availability planning process then the necessary implementation modifications will be made and communicated through an update of the technical guide. The additionally required information will be added in the OPA data flows to enable the previously described

harmonization of data flows, however given not required for operational security processes they will not be mentioned in the OPA contract. In the technical guide it will be specified that this is information needed for IIP and as such not mandatory if IIP contract is not signed.

5.2. Guidelines for publication

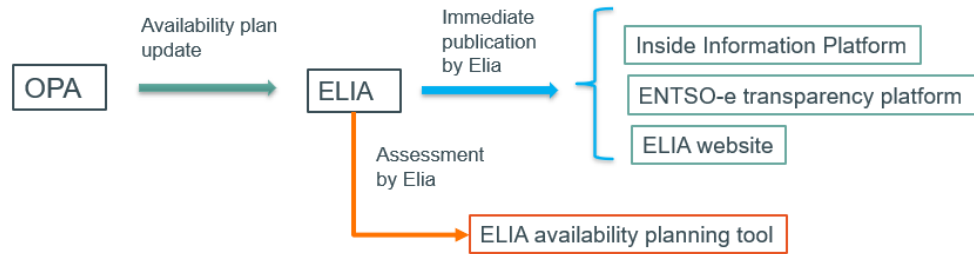
As discussed with market parties during the iCAROS workshops of 21 October 2024 and 20 November 2024, Elia proposes to provide some guidelines related to the provision and publication of availability plans of technical units. These guidelines should be assessed and validated by the CREG:

- Market parties have the obligation to provide information about unavailabilities as soon as the information is known and within maximum 1 hour after the decision is made (for a planned unavailability) or after the change in actual availability (for a forced outage).
- If Elia is data provider for the different processes described previously, Elia publishes the unavailabilities of technical units as soon as they are received and before the validation (if relevant) is performed at Elia side. This ensures that any obligations related to Transparency and REMIT legislations are well respected. The data provided by the OPA represents the best estimate of its maintenance planning and forced outages so it brings more value for the market to publish non validated data than to wait for the final validation by Elia. In addition, in case the update of availability plan is finally rejected, Elia does not delete the published unavailability information. Indeed, Elia is not able to identify if the current published version of the unavailability information is -or not- a better estimate of the maintenance planning than no unavailability published at all. This is illustrated by the following example:
 - An unavailability event is sent by the OPA for a period of 10 days. This event is published on IIP as a first version of an unavailability.
 - After a validation duration of two weeks (according to modalities in the OPA contract), Elia needs to reject this unavailability event because the first 2 days of the unavailability period create a risk for the system security.
 - The OPA updates its unavailability event according to Elia constraints and shifts the unavailability event with two days. The OPA sends it to Elia and it is published as a second version of the unavailability conformed to the real final unavailability timing.

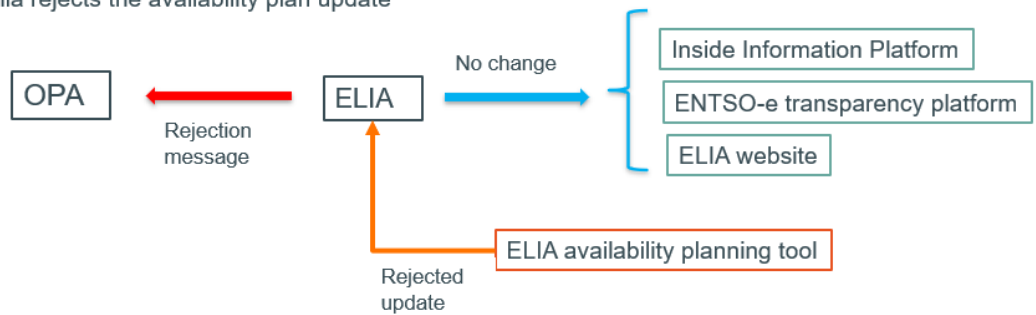
In this specific case, it is more valuable for the market to not delete the first version of the unavailability event until the second version is provided as it is closer to the final version of the unavailability event. In case an update of availability plan is finally rejected, the OPA has to send a new version of the availability plan as soon as possible and at the latest within one hour after the decision related to the new availability plan is made. This update is published as soon as it is received as an updated version of the previous one. The three steps process that is followed in case of rejection by Elia is illustrated in the following figures for two different situations.

1. The OPA has signed an IIP contract with Elia

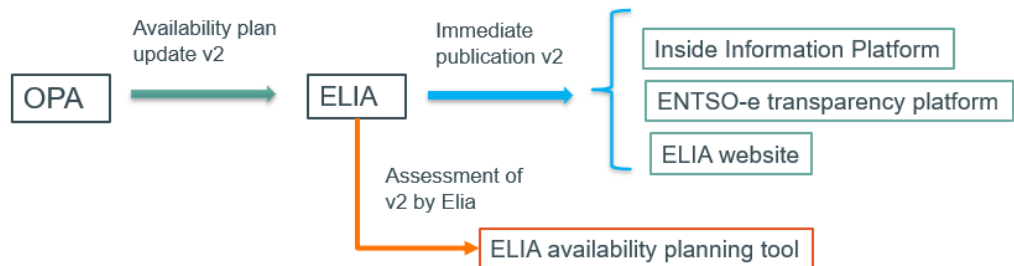
1) OPA provides an availability plan update to Elia



2) Elia rejects the availability plan update

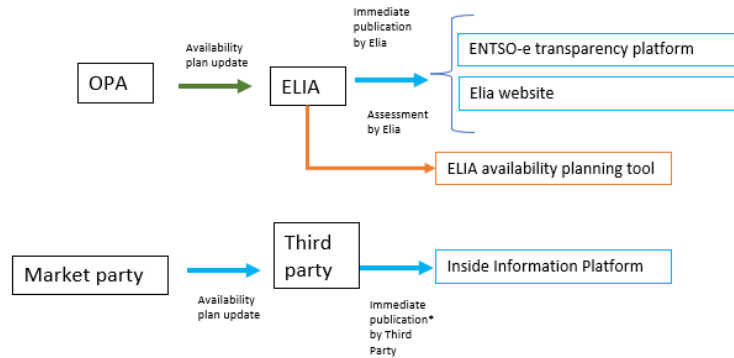


3) The OPA sends a new availability plan update



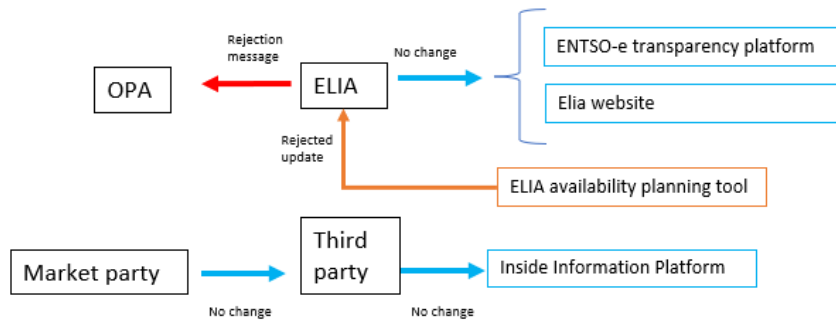
2. No IIP contract is signed with Elia – A third party is in charge of the publications related to REMIT obligations

1) OPA provides an availability plan update to Elia and the market party provides it to the third party for publication on its IIP

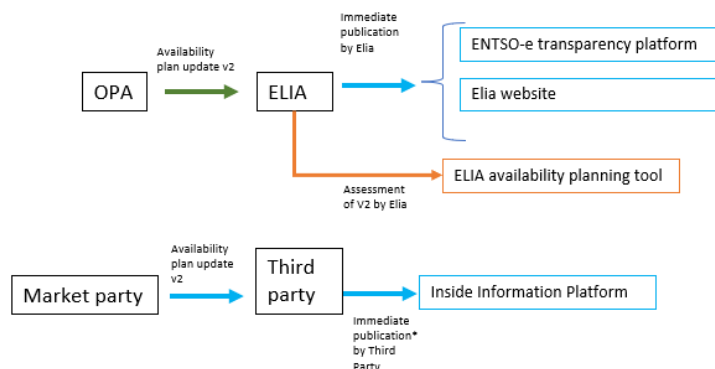


* Assuming a similar process for the publication to the one implemented by Elia

2) Elia rejects the availability plan update



3) The OPA sends a new availability plan update and the market party provides also this new version to the third party for publication on its IIP



* Assuming a similar process for the publication to the one implemented by Elia

6. Summary of the modifications to the OPA contract

The following sections/articles of the OPA contract have been adapted:

- Due to the evolutions of the availability planning process as described in the section 4 of this note:
 - The Title 4 has been fully rewritten to describe the new availability planning process and to remove the existing procedures (note: due to the amount of changes, this Title is easier to read in the clean version of the contract)
 - The annexes 3 and 4 have been adapted accordingly
 - The article II.3.9 has also been adapted due to the removal of the existing procedures
 - Some changes have been made in the Title 6 to describe the elements related to the price offers (as described in the section 4.1.5 of this note)
 - The article II.13.6 has been added to clarify the invoicing process in case the OPA has to remunerate Elia for a change request that is “accepted on the condition that associated costs are compensated”
 - The FO definition has been adapted as explained in section 4.3 of this note
- Due to the harmonization with Transparency process, the Title 8 has been added in the OPA contract
- Additional minor change: switch between article II.2.2 and II.2.3 to improve the logical order of articles