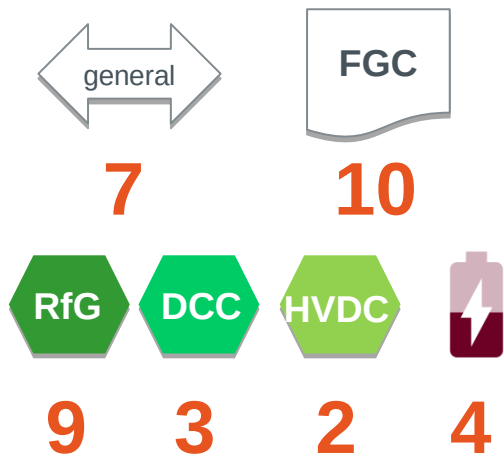


Responses received public consultation FGC and GR :



Next steps:

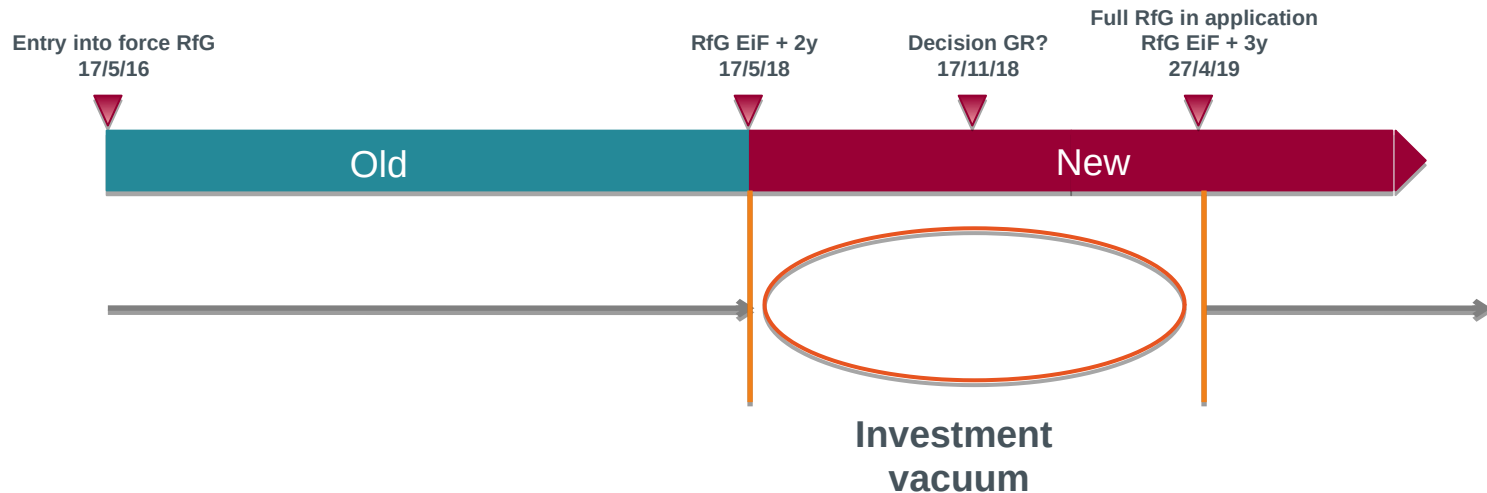


WG Belgian Grid: discussion feedback public consultation



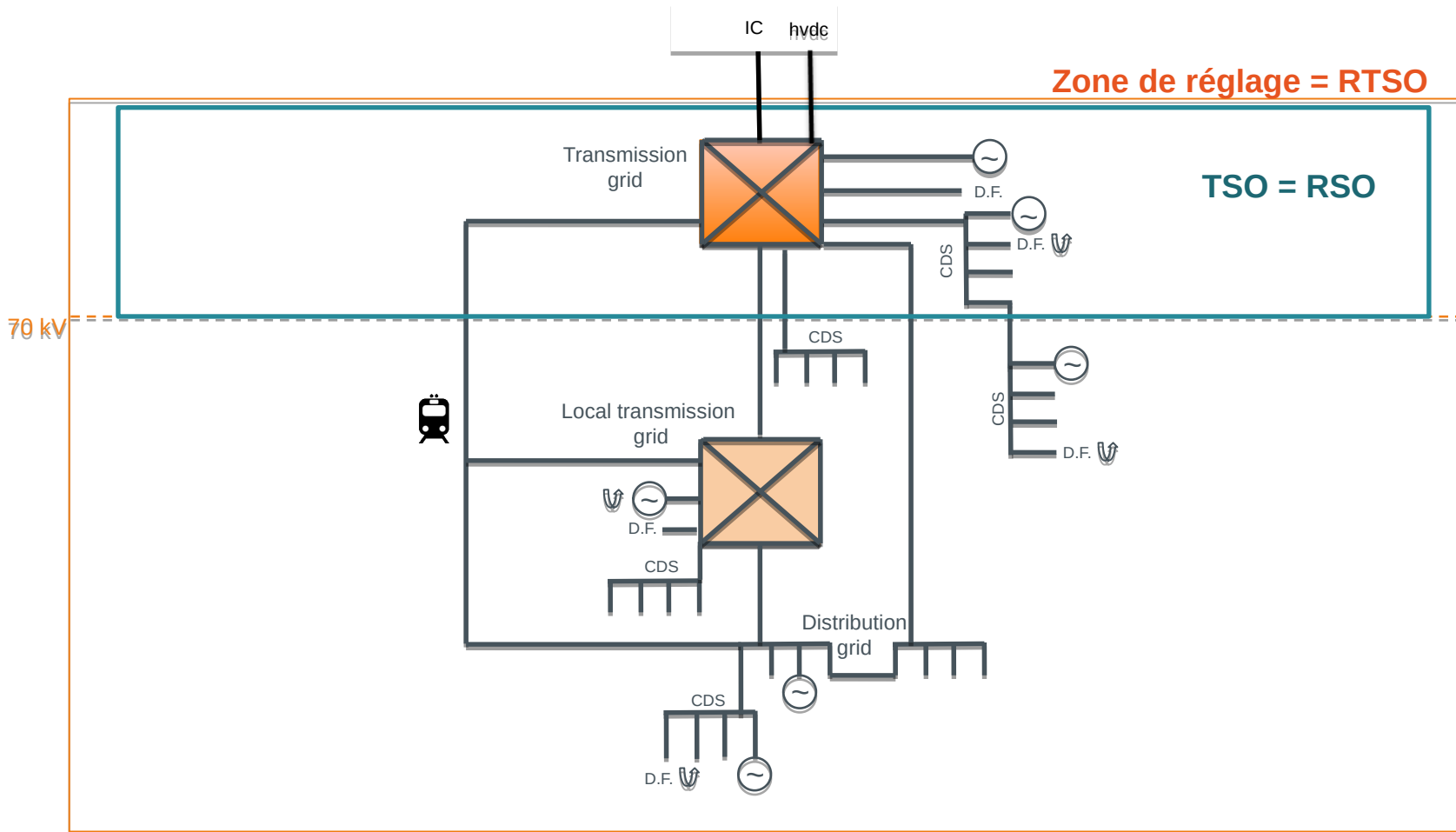
Submission proposals Federal Grid Code, General Requirements and thresholds ABCD

Proposal	Public consultation	Submission
Federal Grid Code	FRA + NED	FRA + NED (report FR/NL)
General Requirements	ENG	FRA + NED (report ENG)
T&C BRP	FRA + NED	FRA + NED
T&C BSP	ENG	FRA + NED



- Art. 4.2 RfG:
 - “For the purposes of this Regulation, a power-generating module shall be considered existing if:
 - (a) it is already connected to the network on the date of entry into force of this Regulation; or
 - (b) the power-generating facility owner has concluded a final and binding contract for the purchase of the main generating plant by two years after the entry into force of the Regulation.
- Art. 7.4 RfG
 - The relevant system operator or TSO shall submit a proposal for requirements of general application, or the methodology used to calculate or establish them, for approval by the competent entity within two years of entry into force of this Regulation.
- On 17 May 2018, several investments considered as “new” while no decision by competent authorities on the applicable requirements □ **Investment vacuum**
- Mitigation possibility in Art. 4.2: postponing the date for a GU to become “new” with 1 year (as France and UK already did)
 - A Member State may provide that in specified circumstances the regulatory authority may determine whether the power-generating module is to be considered an existing power-generating module or a new power-generating module.

Feedback received public consultation	Position Elia
<p>General scope of Title III : connection on transmission grid but not only</p>	<p>Competency based on RTSO for the whole control zone => to clarify with a general article just after the Title (to develop current art 38 § 1 al 2) + new title</p>
<p>Storage</p> <ul style="list-style-type: none"> - full “out of scope” from FGC for emergency storage (Art 99) - Quid regime for existing ? - How to apply types ABCD without derogations possibilities whereas reference to CNC rules ? 	<ul style="list-style-type: none"> - OK : definition & exemption from FGC in Generalities - No specific rules for existing storage - OK : Application by reference + BE rules foreseen
<p>Process-driven generators: update of FGC requirements and fine-tuning definition Noodgenerators : full “out of scope” from FGC (also for existing)</p>	<p>To review the text based on the proposals (see comments Febeliec, BASF, Cogen...) => SEE NEXT SLIDE Noodgenerators: OK + definition art 3.2 RfG</p>
<p>Several comments / questions on technical requirements for existing grid users</p>	<p>To adapt after internal analysis</p>
<p>Substantial modernization : use vague concept of ‘charge’ ; check with op 28/02/2018 een uitgebreide analyse alsook tekstvoorstellen heeft doorgestuurd aan Elia; Not aligned with approach proposed in WGBG in 11/2017 ; To detail more the partial compliance in art 162 § 4; what criteria for storage ? To add a global timing ?</p>	<p>Proposal in FGC aligned with decision taken in WGBG:</p> <ul style="list-style-type: none"> ▫ For demand : ad-hoc analysis in the modernization study (already in 164 § 5 but not clear enough) ▫ Suppress criteria “charge” in §§ 3-4 ▫ Information on partial conformity : list to come (164 § 2)
<p>Some specific concepts like “charge”, “installation”, “industrial site”... to be defined ; To suppress/ keep wording “unite réglante” ?</p>	<p>OK (link with Title Generalities)</p>
<p>Connection procedure EON/ION/LON/FON :</p> <ul style="list-style-type: none"> - How to improve the information flow between RSOs when such a procedure at RSO level ? - What/how to lighten it if not full new connection procedure but new installation of Tractienet Spoor or CDS ? - In practice, conformity if the one of ‘achterligende installaties’ => to clarify 	<ul style="list-style-type: none"> - OK, possibility to clarify text - Clarify connection procedure is Elia as RSO - Connection procedure will be applied on a very pragmatic mode (sohrt study if possible/formal letter only, similar to now, light for Type A,B,C)



Feedback received during public consultation	Elia's position
<p>Terminology/Definition</p> <ul style="list-style-type: none"> • Difference 'Mesure/meting' vs. 'Comptage/telling'. "Données d'accès"/"données de mesure"/"données de comptage" • Scope of definition 'comptage/telling' 	<p>Ok, we zijn aan het werken aan de definities.</p>
<p>Scope of application</p> <ul style="list-style-type: none"> • Submetering • Competence TSO vs. CDSO to be clarified 	<p>Deze voorstel van FTR geeft geen monopolie aan de TNB inzake submeter.</p> <p>Artikel 287 duidt de lokalisatie aan van meetuitrustingen die worden geïnstalleerd. Alinea 4° betreft meetuitrustingen stroomafwaarts van het aansluitingspunt dat ondersteunende dienst leveren. Artikel 292 over eigendom betreft enkel in artikel 287, 1°, 2° en 3° bedoelde meetuitrustingen. Hierdoor zijn submeters niet de exclusieve eigendom van de TNB maar kunnen ze de eigendom van de netgebruiker zijn.</p> <p>Voorstel om tellingen op CDS in een apart § is aanvaard. Het is de verantwoordelijkheid van de CDS om te informeren over de plaats van de meetuitrustingen dewelke in het toepasselijke contract voor ondersteunende diensten worden opgenomen.</p>
<p>Transitory requirements</p>	<p>Opmerking Elia: al beperkend "nadeel kunnen berokkenen" Voorstel: toevoegen "motivatie"</p>

Modernisation: requirements for new CDS created over-night, no technical impact

- Art 74 § 1er : explicit reference to Art 4 CNC => Need to adapt the connection contract (and thus technical significant changes) for being qualified as new
- Is it enough ? Possibility to complete/clarify the concept of “new” on this respect

Relations TSO – CDSO:

What content of the connection contract of the CDSO <> requirements of the generation unit within a CDS ?

Need of clarification of CDS and of industrial site ?

- Art 360 - 362: organization of the links between CDSO & TSO regarding CDS-grid users
- Possibility to complete/clarify the text on info exchanges
- Possibility to complete/clarify the text on industrial site <> CDS concepts

- Links with respective competences TSO / RSO / CDSO / federal – regional levels
 - Quid set of rules for internal working of the CDS (regional competency) ?
 - Balancing / BRP / market aspects is of federal competency

Notion of access point within the CDS / **access to market** : introduction of a complementary notion

Many thanks for your attention!

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