

WG Adequacy #10

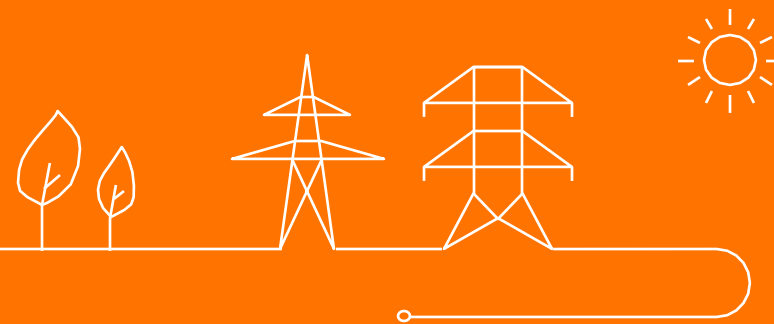
13 September 2022

Agenda

- Welcome
- Minutes of Meeting WG Adequacy #9 (25.08.2022)
- PQ Permit Requirements
- Auction Timeline
- Assessment of the amount of Market Response in Belgium [E-cube]
- CRM: proposal for design evolutions
- Tender for Low Carbon Technologies : Design
- Next meetings



Minutes of Meetings

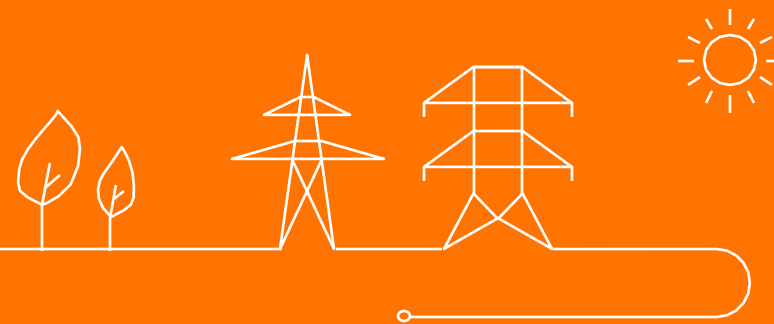


Minutes of Meeting

- **WG Adequacy #9 – 25.08.2022 : To be approved**
- *The MoM were sent on 06.09.2022. No comments were received.*



PQ Permit Requirements



Permit requirements (prequalification)

- **Origin** : Act 28/2/2022 amending E-act; Prequalification criterion introduced in the art 7undecies §12 E-act : “c) if (a) permit(s) is(are) required under regional regulations for the construction and/or operation of the capacity concerned, proof that the capacity holder has the permit(s) issued at the last administrative instance, prior to the closing date of the submission of the bids in the context of the auction referred to in paragraph 10” (free translation)
- **Justification** : “This concerns the situation in which, on the one hand, the holder of a capacity selected in the auction organised in 2021 does not have the permits granted at last administrative instance under regional regulations required for the construction and operation of that capacity on 15 March 2022, and in which, on the other hand, this absence of a permit seriously affects the security of supply of the Belgian control zone for the relevant period of capacity supply.” “Specifically with regard to new thermal power plants, it is established that a period of three and a half years after obtaining the permits is necessary to develop, build and commission them.” “However, in the case of a capacity of a significant volume which presents a problem such as that of the lack of permit, these measures and penalties do not provide a satisfactory solution to the objective of ensuring security of supply.” “The holder of a capacity selected in an auction four years prior to the delivery period could a priori resolve the difficulties associated with obtaining its permits or the delay in the construction of its installation through the secondary market.” (Preparatory Works – free translation)



Permit requirements (prequalification)

- **Context:** prequalification (to be distinguished from permitting milestone !)
- **Scoping:** permits required under regional regulation for the construction and/or operation of a capacity:
 - Flanders: bouwvergunning, stedenbouwkundige vergunning, milieuvergunning and/or omgevingsvergunning
 - Brussels: bouwvergunning, stedenbouwkundige vergunning and milieuvergunning / permis de bâtir, permis d'urbanisme, permis d'environnement
 - Wallonia: permis de bâtir, permis d'urbanisme, permis d'environnement and/or permis unique
 - Permit renewal (relates not to construction but to operation of CMU which is subject to limited period) : to be done in due time,
- **Out of scope:**
 - Permits for grid connection and grid reinforcement = out of scope
 - Federal permits (based on art 4 E-Act for production and storage facilities)
 - Federal or regional rights of way (Permission de voirie-declaration d'utilité publique / wegvergunning-verklaring van openbaar nut)
- **Delivered at the last administrative instance: meaning?**
 - Positive permit decision by a public authority without any possibility to attack the decision before a higher public authority
 - Eg. Decision delivered at first instance, but deadline for appeal expired, Decision delivered at first instance but appeal rejected, Decision delivered in appeal against permit refusal
 - Permit decision however still open to judicial review before State Council/Council for Permit Disputes



Permit requirements (prequalification)

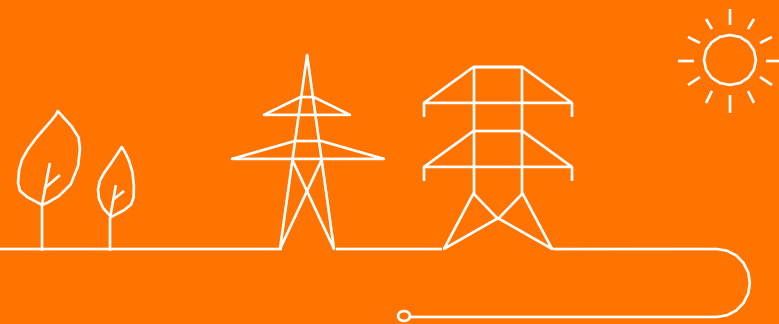
Slide adapted

- **Proof:** mere declaration is not enough: the deliverance of the permit needs to be proven:
- **Existing CMU:**
 - permit(s) delivered at the last administrative instance (all relevant parts) or certified true copy
 - Declaration of conformity
 - if relevant : other documents, pictures, ... providing evidence of the CMU being operational.
- **Additional CMU:**
 - Permit(s) delivered at the last administrative instance (all relevant parts)
 - To allow Elia to check that the deadline to appeal the permit provided has (or not) expired on 30/9/2022: Proof of advertising (aanplakking/affichage) of the permit or a certificate by the relevant public authority that the permit has been advertised
 - Even if the deadline for an appeal is expired on 30/9 : Proof that the decision has not been appealed by 30/9:
 - Flemish Region: see Omgevingsloket
 - Walloon and Brussels Capital Region: contact the cabinet of the relevant administrative appeal authority and ask them the conformation that no appeal has been filed"

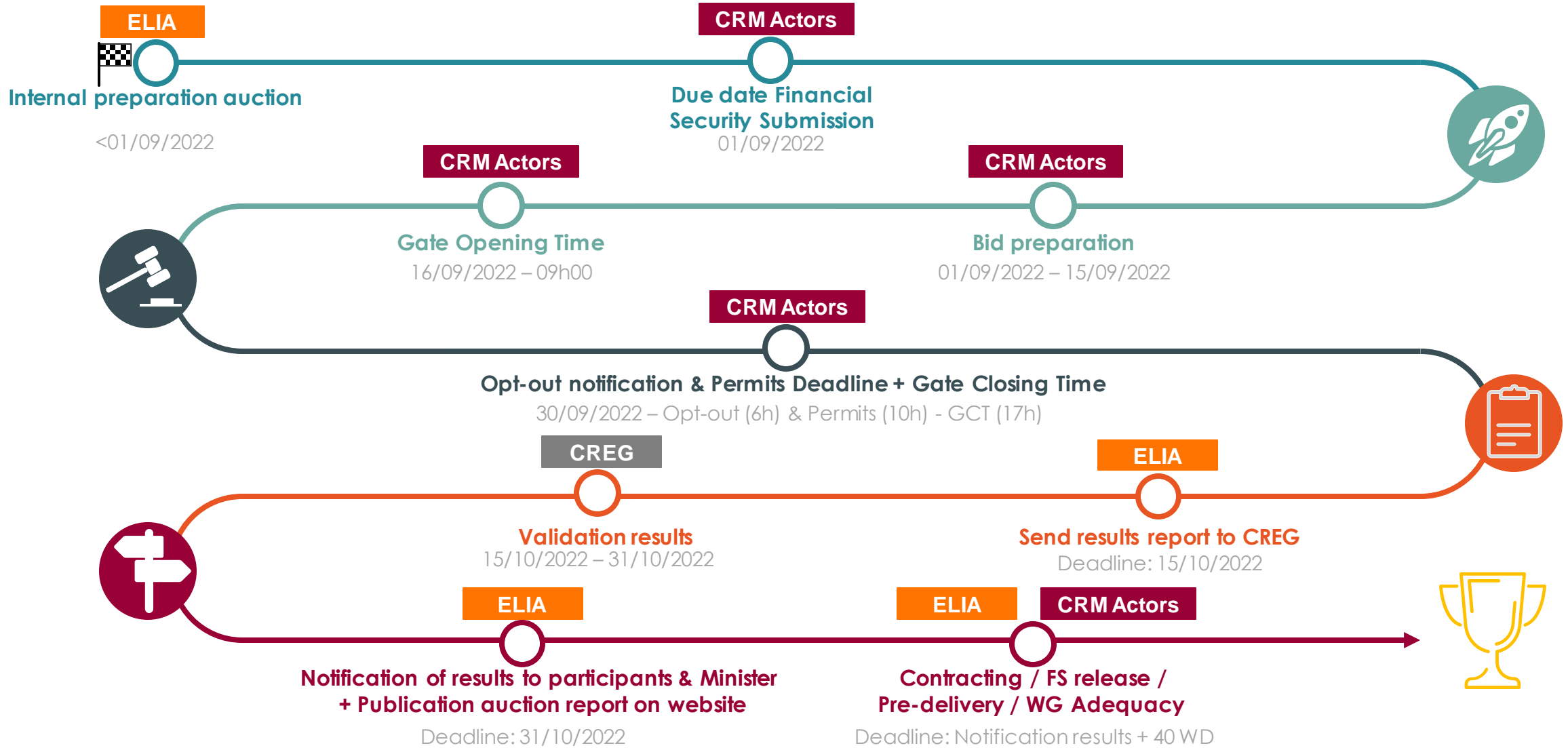
Conclusion: should a CRM candidate not yet have provided the evidence as required and described above, please provide it by 30/9



Auction Timeline



Y-4 2026-2027 Auction Timeline (normal process, excl. fallback)



Bid saving & submission

Bid preparation

- CRM candidates can save bids starting from 01/09/2022 at 09:00

Gate opening time

- CRM candidates can submit bids starting from 16/09/2022 at 09:00

Gate closing time

- CRM candidates can submit opt-outs, permits and bids until Friday 30/09/2022
 - 06h00 Opt-out submission deadline
 - 10h00 Permit submission deadline
 - 17h00 Bid submission deadline (GCT)



Validation results

- Elia will formally send the results to CREG by 15/10/2022 the latest.
- CREG needs to validate the results and formally communicate this validation to Elia by 31/10/2022 at the latest.



Publication results by Elia

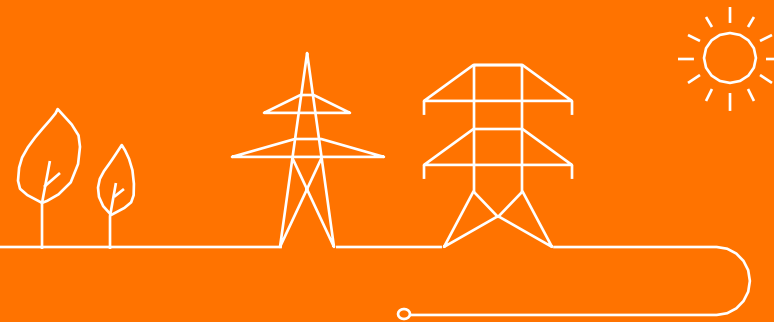
➤ Deadline for Elia is 31/10/2022

➤ Communication channels

- Publication of the auction report on the Elia.be website
- IIP Publication (Inside Information Platform)
- Via CRM IT Interface to individual market parties (selected and non-selected candidates)
- Send auction report to Minister

- Email to notify WG Adequacy, User Group and WG Belgian Grid that results are available on the website
- WG Adequacy: presentation of auction report on 17/11/2022

Assessment of the amount of Market Response in Belgium



Context and introduction

- Given the strong change in market circumstances, Elia has identified that the lower price threshold used in the '**Assessment of the amount of Market Response in Belgium**' study is no longer fit for purpose.
 - Elia and E-cube propose to only use the higher price threshold to determine the market response (see next slides)
 - Elia and E-cube propose to investigate a **more dynamic price threshold for the next iteration of the study**.
- As indicated in the previous WG, Elia is working on an 'study on the '**quantification of residential and tertiary future consumer flexibility**' study for the upcoming Ad&Flex.
 - Although both studies aim at quantifying flexibility, **their scope and time horizon is different**. The MR study is a look-back study and does not predict future volumes of market response.

Market Response – update 2022

Working Group Adequacy

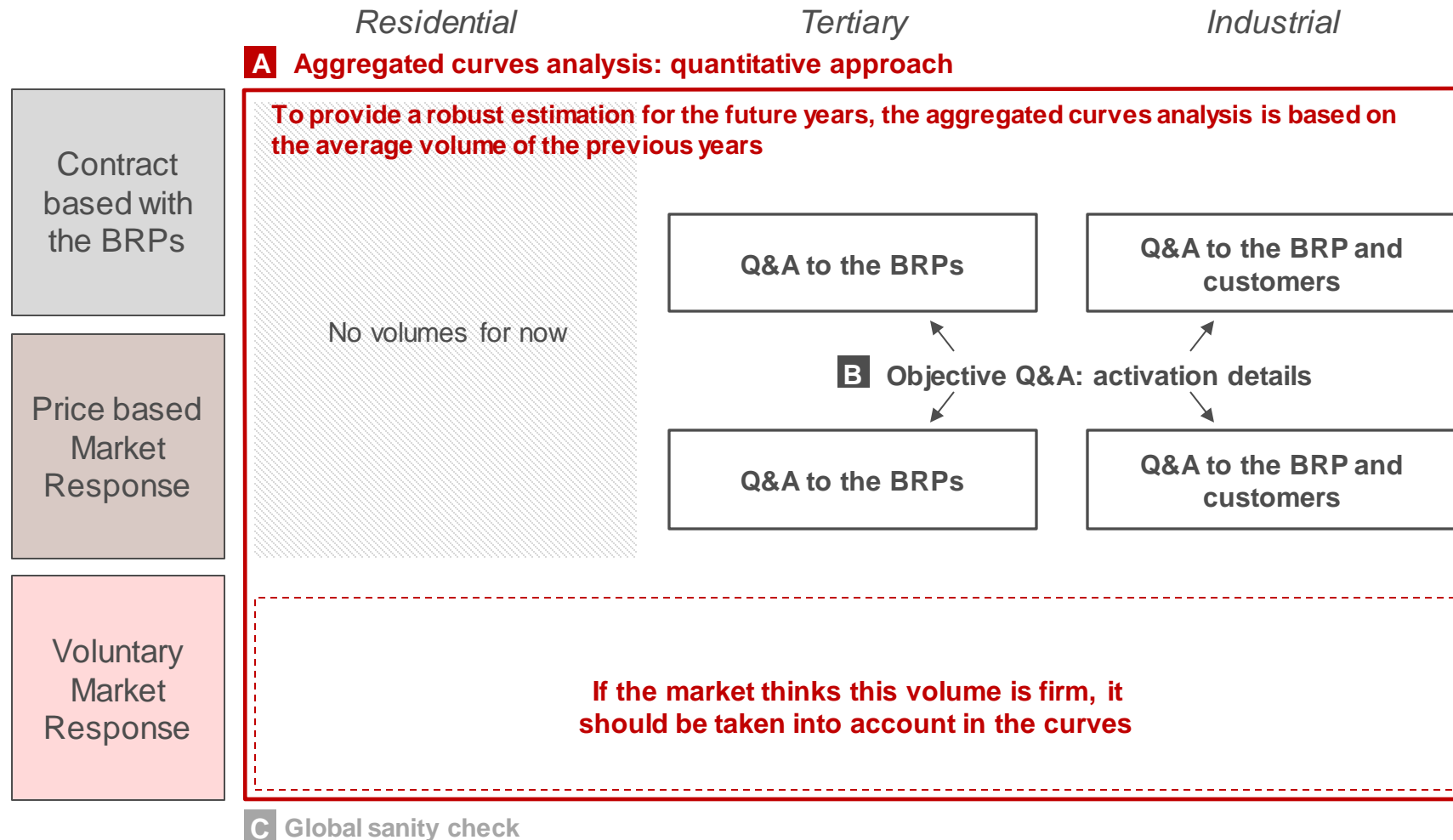
Brussels, September 8th, 2022



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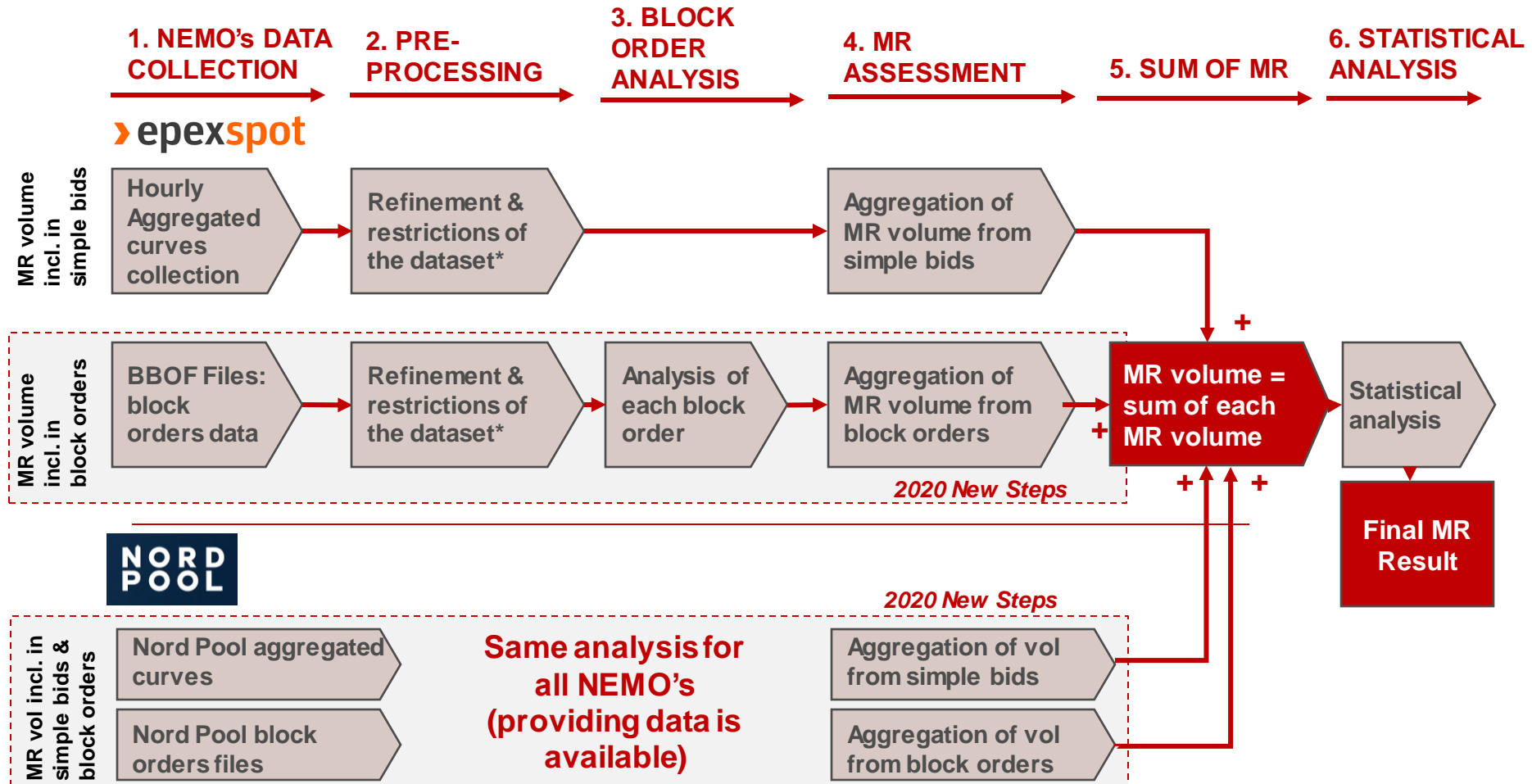
- 1** | Goal, scope & methodology of the MR update – *Reminder*
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- 5** | Conclusion

In 2017, a robust quantitative methodology was established based on the aggregated curves, and complemented with a qualitative Q&A to define the details of the activation



The 2020 updated methodology enables MR from block orders to be accounted for and allows the use of data from multiple NEMOs

GENERAL METHODOLOGY FOR THE CURVE ANALYSIS



MR = Market Response * refinement: national holidays considered as Sundays; restrictions: 1.11 → 31.3, weekdays, 8 AM to 8 PM)

Historically MR was calculated on a threshold of 150€/MWh & 500€/MWh, but in the current context of high energy prices only the 500€/MWh will be analysed for the winter 21/22

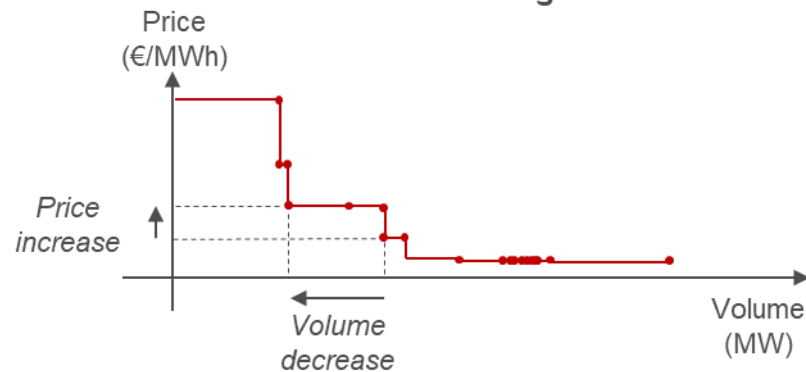
GENERAL METHODOLOGY

Market Response volumes valued in the DA market

Demand decrease

- This part can be analyzed directly in the aggregated demand curve, by studying the decrease of volume when price increases

Demand curve for a given hour



Offer increase

- Instead of a demand decrease, suppliers can value Market Response as new offer in the market: this part would appear in the supply curve
- Historically, due to the possible presence of generation bids in the offer curve, two price thresholds have been set up:
 - Volumes above 150€/MWh, which correspond to the base case of Market Response volumes
 - Volumes above 500€/MWh, which enable to exclude all possible generation bids

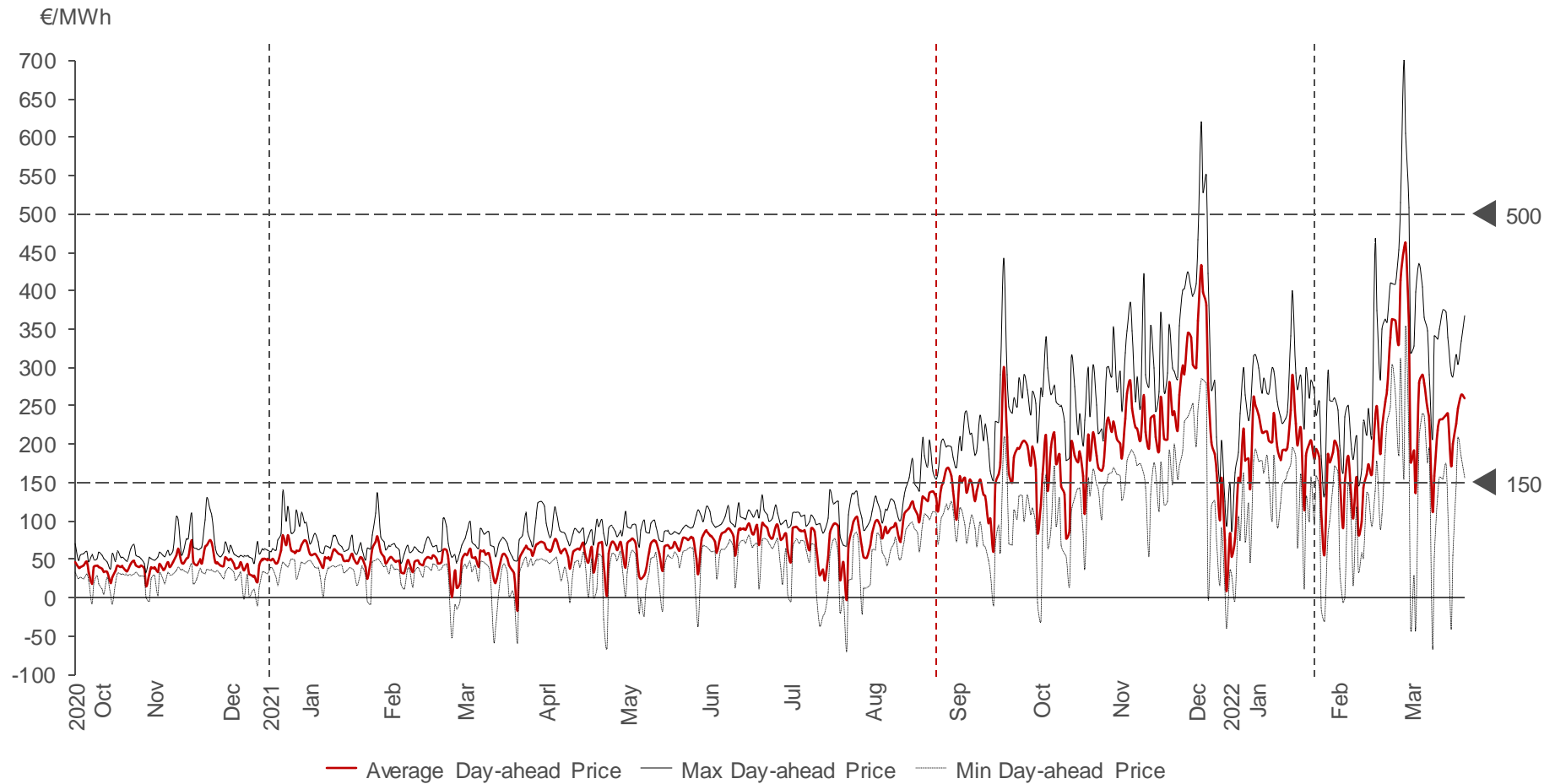
In the context of soaring energy prices, it is more reasonable to carry out the quantitative analysis **only with the 500€/MWh mark**. The 150€/MWh mark was proposed at a time where electricity prices were significantly lower (around 40-50€/MWh). The 500€/MWh mark is deemed more relevant in the current context of higher energy prices.

Disclaimer:

The details on the activation cannot be estimated with the aggregated curve methodology, it is not possible to extract it from the curves. This has been validated with EPEX SPOT

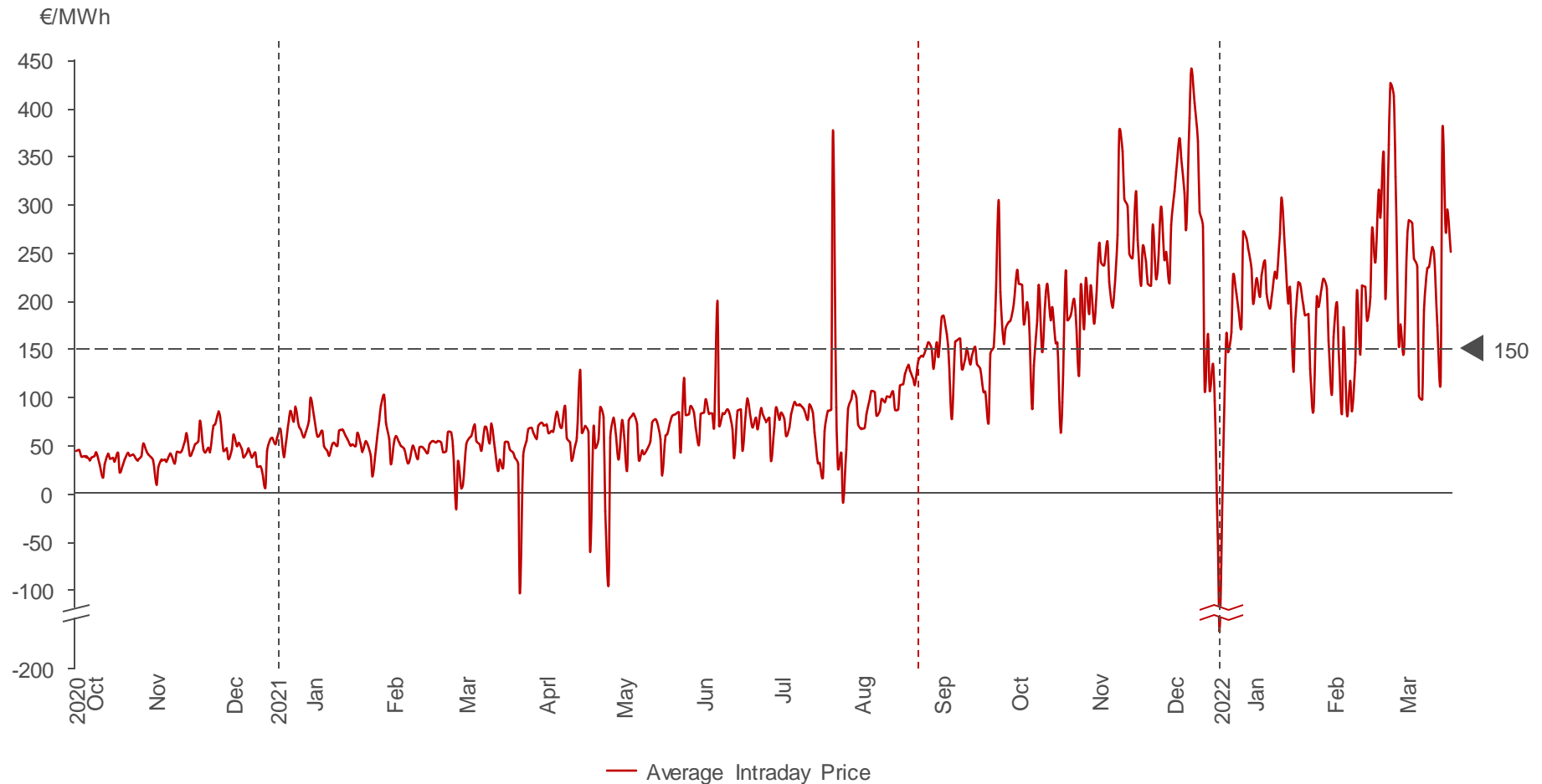
We propose to take the 500€/MWh threshold for the winter 2021/2022 as from end of August 2021 prices were frequently above the 150€/MWh mark making it not relevant anymore

BELGIAN DAY-AHEAD PRICE EVOLUTION FROM 15/10/2020 TO 31/03/2022



Intraday prices are also regularly above the 150€/MWh mark after August 2021

BELGIAN INTRADAY PRICE EVOLUTION FROM 15/10/2020 TO 31/03/2022



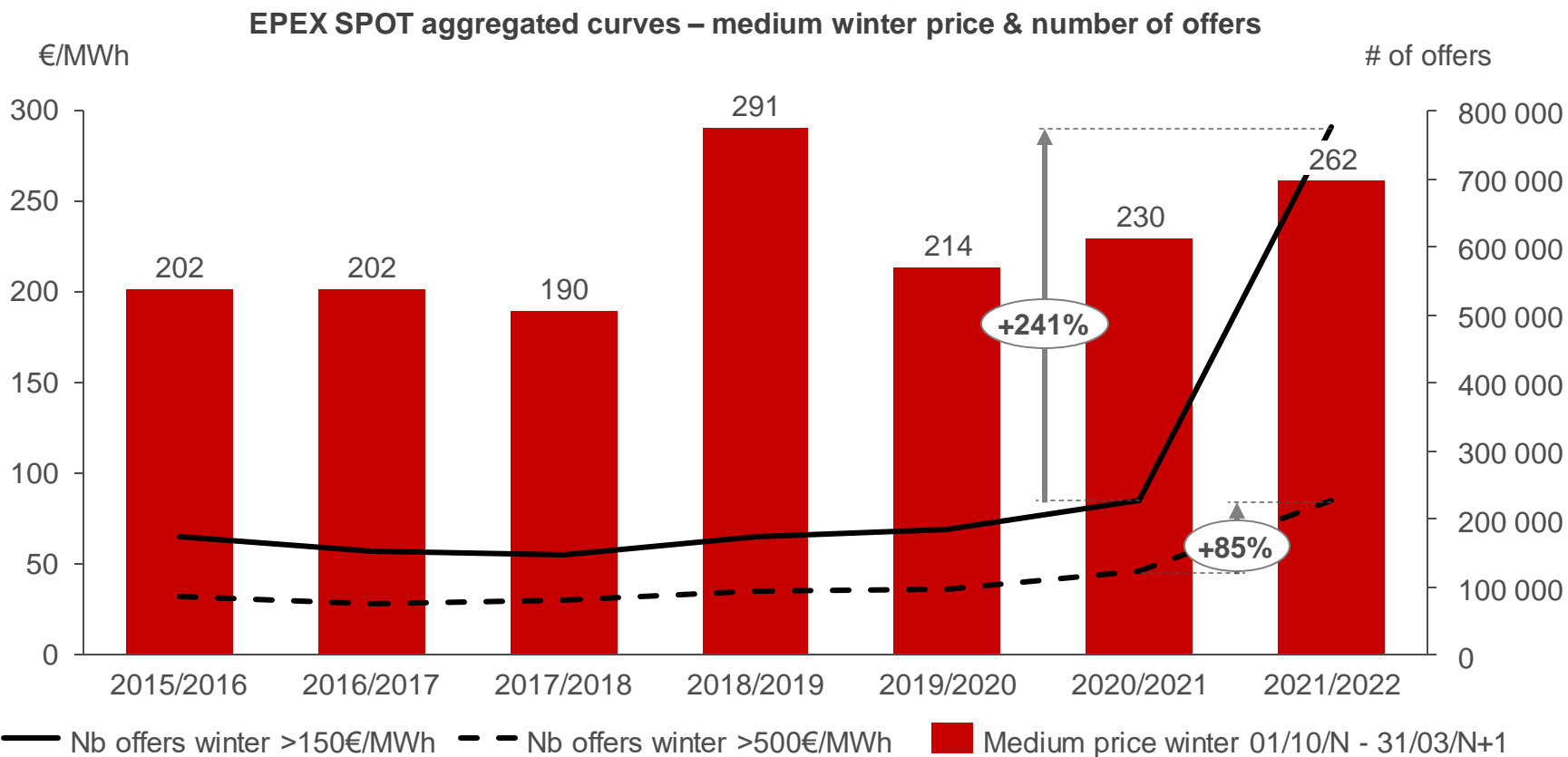
Note : For clarity of representation purposes Min & Max prices were not represented on the graph

Source: E-CUBE Strategy Consultants, Elia

Between winter 2021/2022 and 2020/2021, the number of offers >150€/MWh saw an increase by 241% and 85% for the >500€/MWh

OVERVIEW OF BLOCK ORDERS

There is a strong increase in the number of offers >150€/MWh and >500€/MWh. This evolution also makes the 500 €/MWh more relevant than the 150 €/MWh (this last threshold would lead to very high MR volumes)



The methodology is based on three restrictions, in line with the past years

GENERAL METHODOLOGY

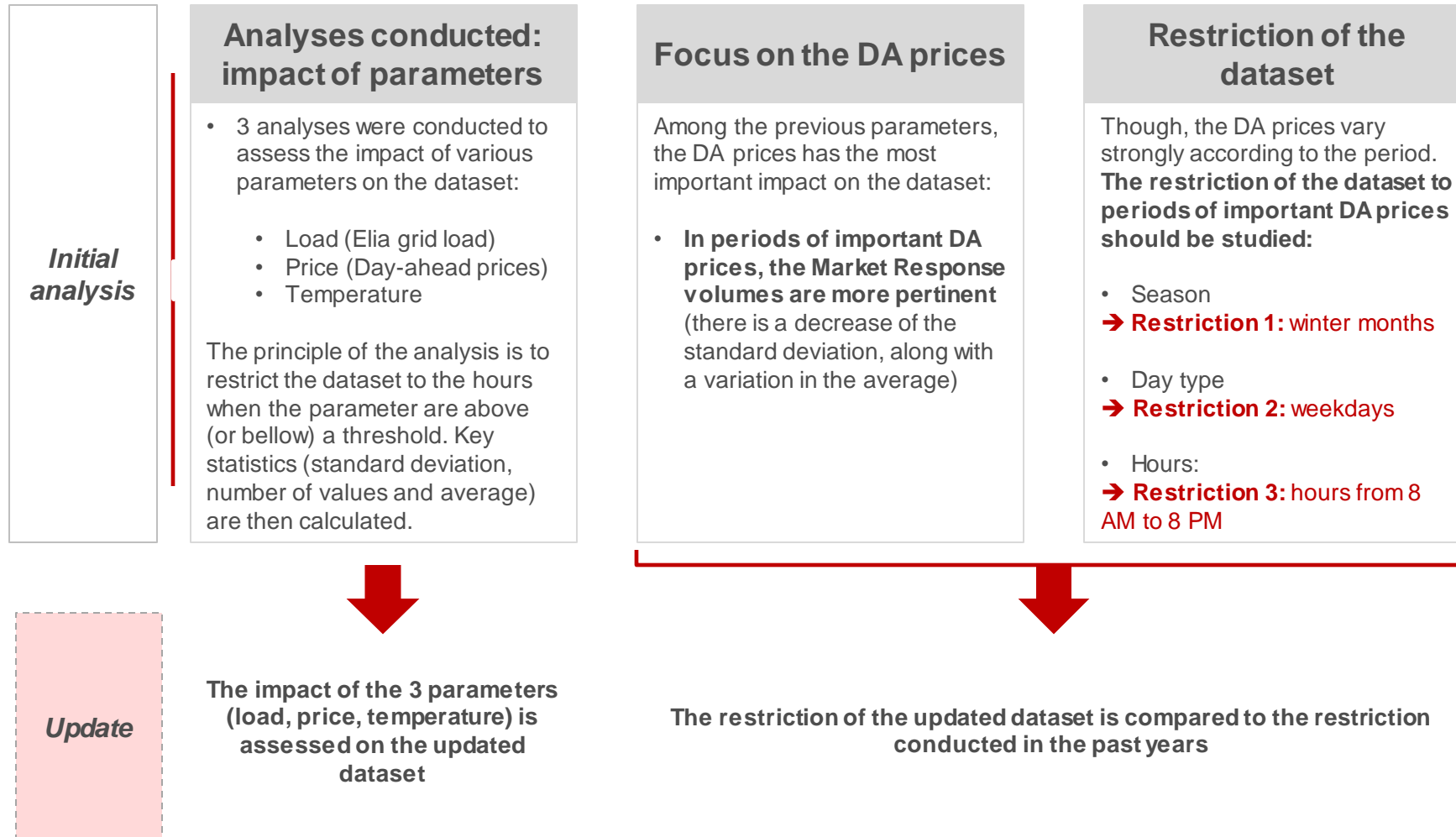
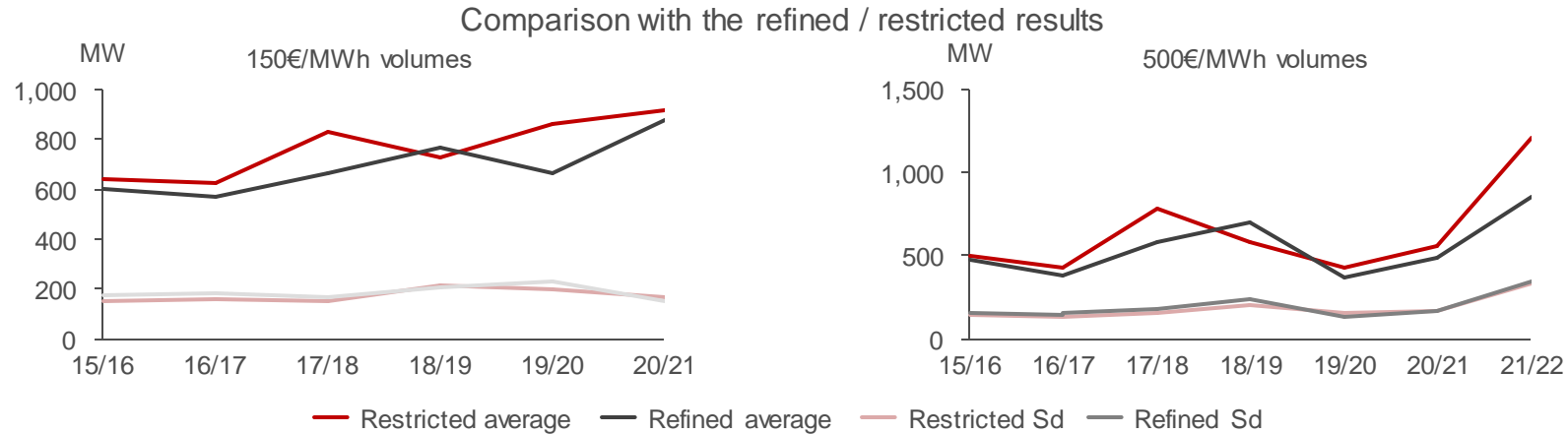


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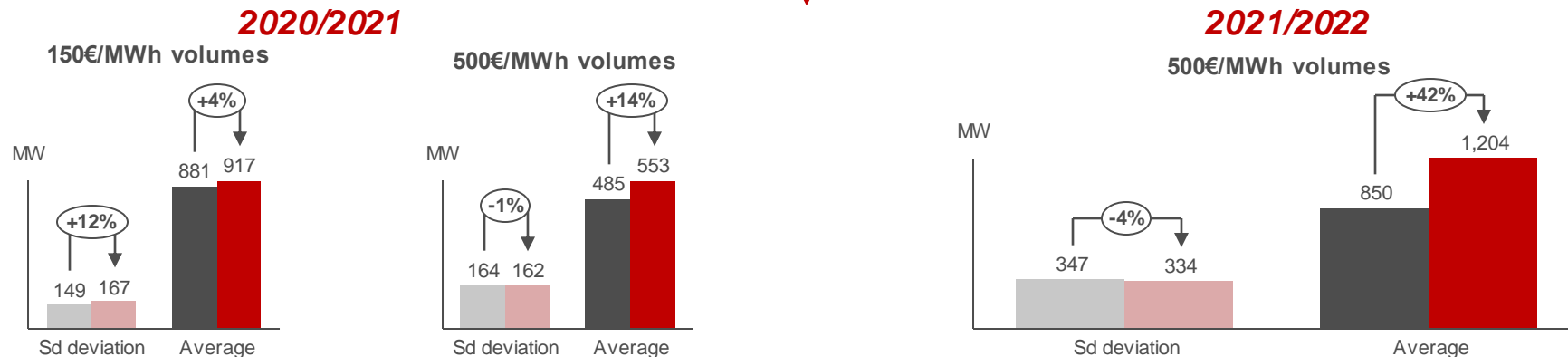
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2021/2022 sees a high increase of average MR volumes for 500€/MWh thresholds after restrictions

SUMMARY OF THE TWO CATEGORIES (REFINED AND RESTRICTED DATASET) – EPEX SPOT DATASET



Note: refined dataset - yy/(yy+1) is from 01/04 of year yy to 31/03 of year (yy+1)

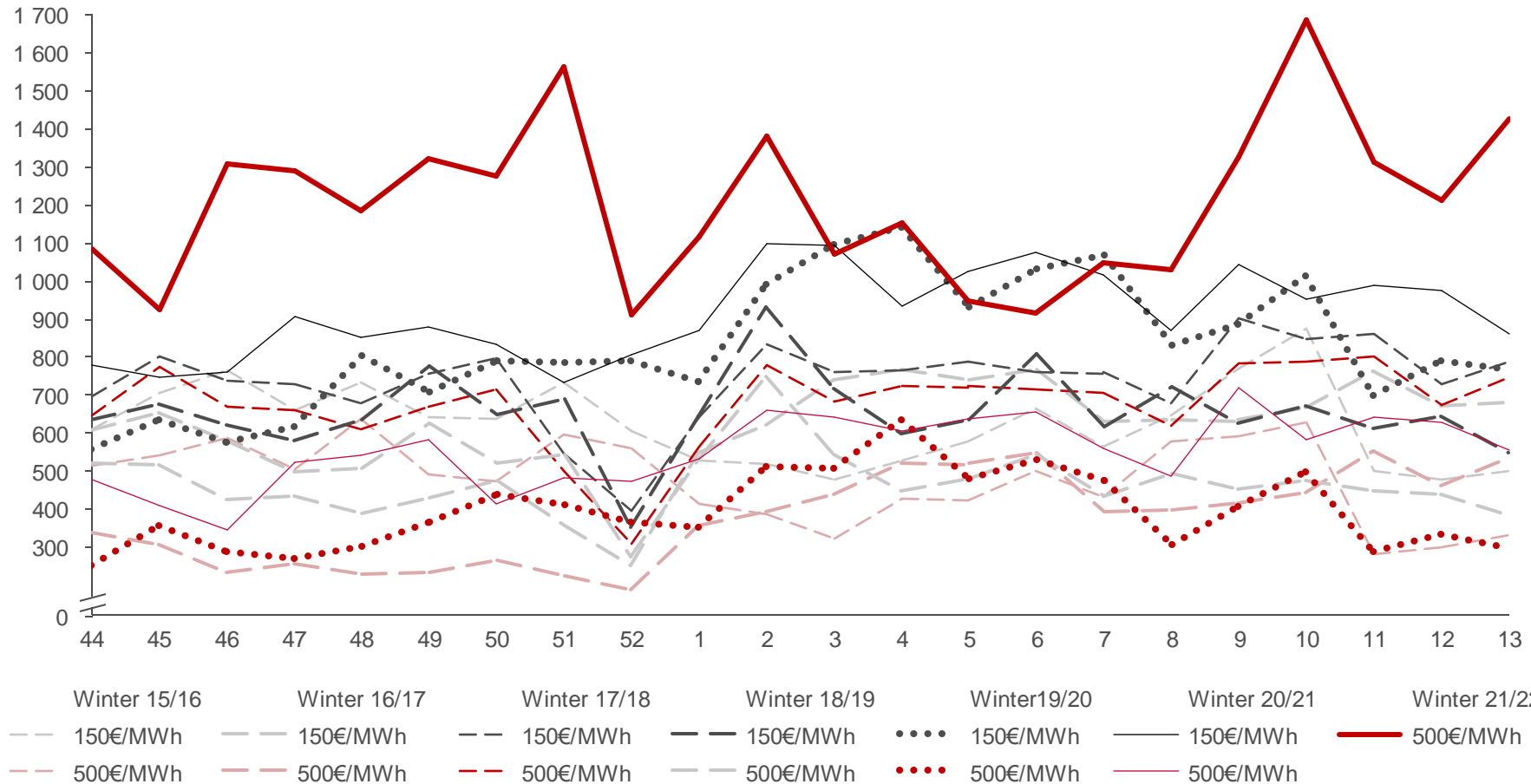


Refined dataset average
 Refined dataset Sd
 Restricted dataset average (w inter peak hours)
 Restricted Sd

Winter 2021/2022 results in high market response volumes at the 500€/MWh threshold

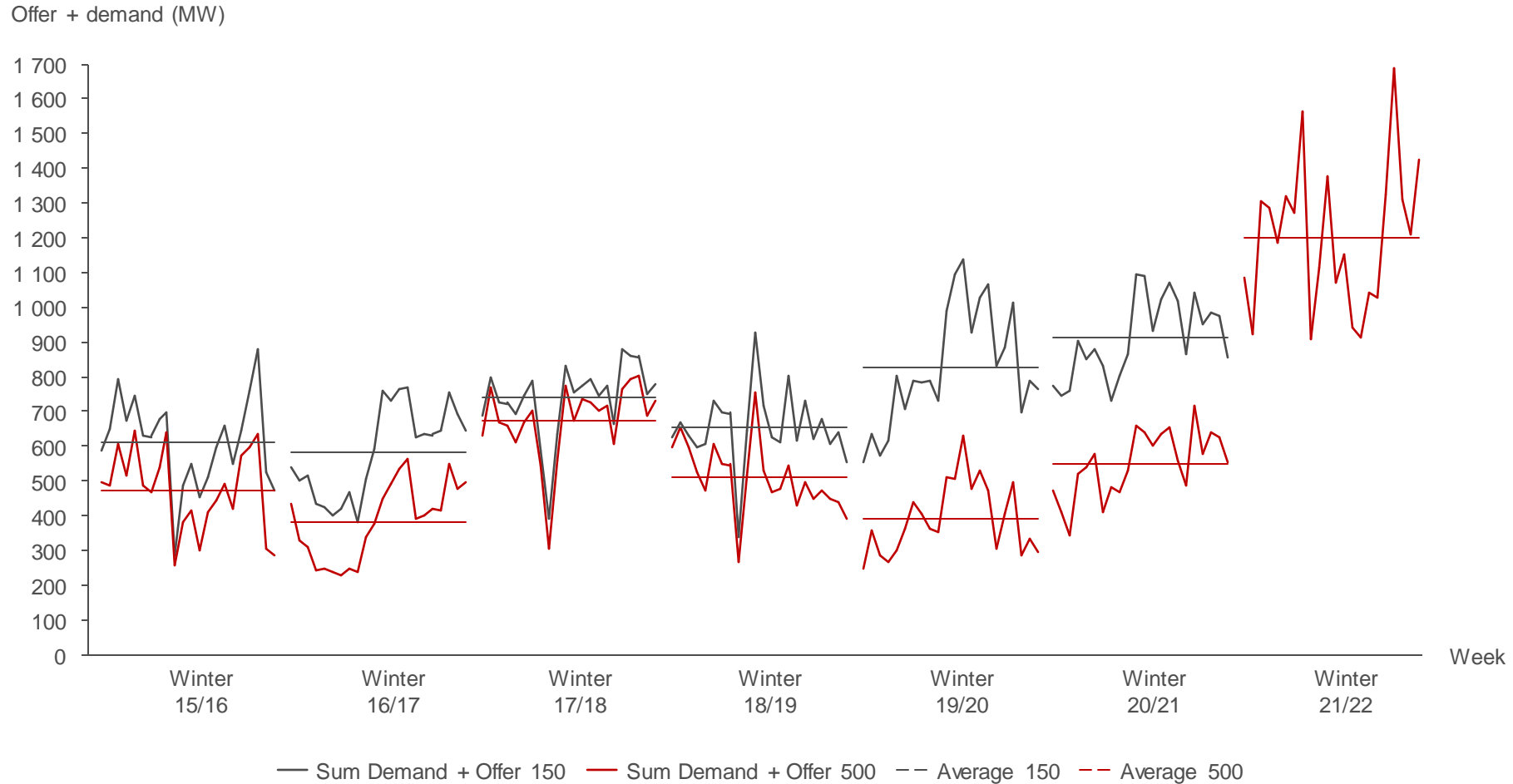
MR PER WEEK FOR THE TWO THRESHOLDS AND PER YEAR FOR EPEX SPOT AGG CURVES

Offer + demand (MW)



Working with the 500€/MWh threshold has become more relevant for adequacy in times of high market prices

MR PER WEEK FOR THE TWO THRESHOLDS AND PER YEAR FOR EPEX SPOT AGG CURVES

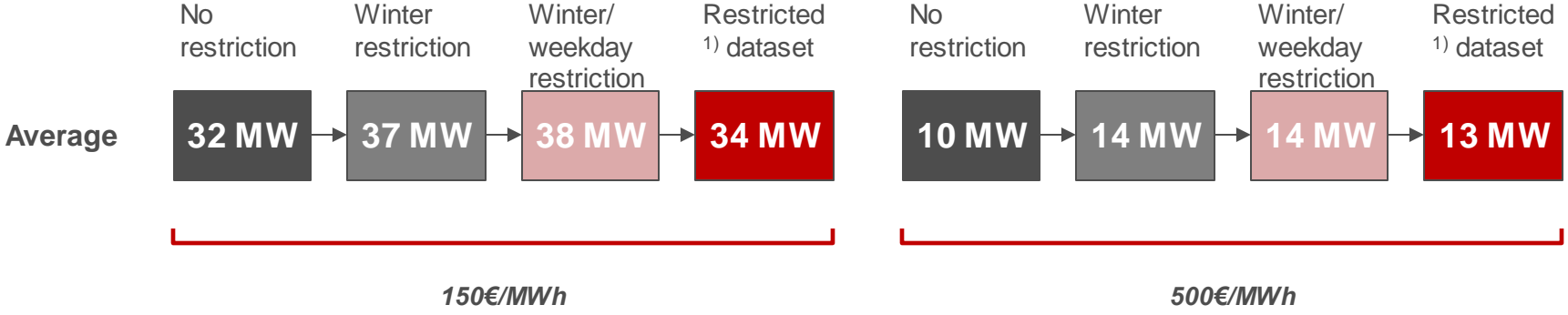


EPEX SPOT BLOCK ORDERS

The average of EPEX SPOT Block Orders has increased significantly between 20/21 and 21/22, following much higher prices and bigger volumes of traded blocks in 2021/2022

MR FOR EPEX SPOT BLOCK ORDERS FOLLOWING THE DIFFERENT DATA RESTRICTIONS

2020/2021



2021/2022



Note : The nature of Block orders makes it that there are no Std deviation data
 Source: E-CUBE Strategy Consultants, EPEX SPOT

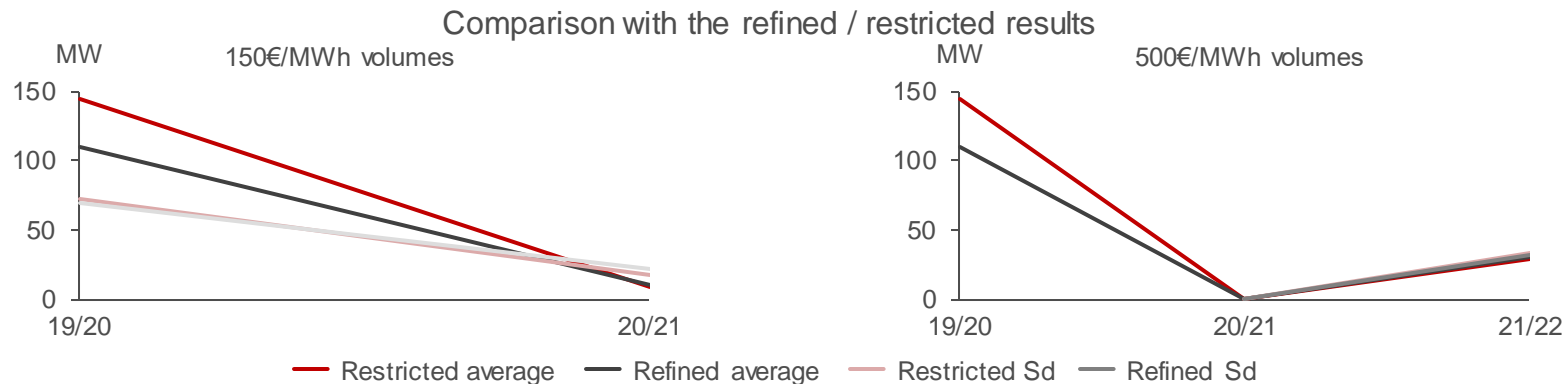
1) Restricted data = winter, weekdays, peak hours

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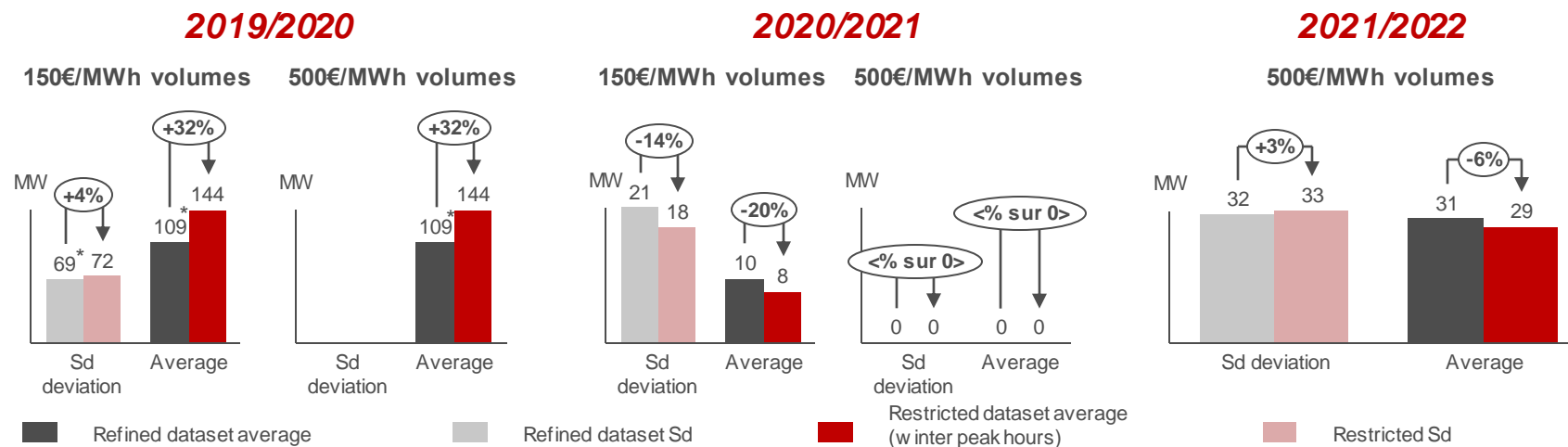
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MR volumes from Nord Pool aggregates curves are still limited

SUMMARY OF THE TWO CATEGORIES (REFINED AND RESTRICTED DATASET) – NORD POOL DATASET



Note: yy/(yy+1) is from 01/04 of year yy to 31/03 of year (yy+1)

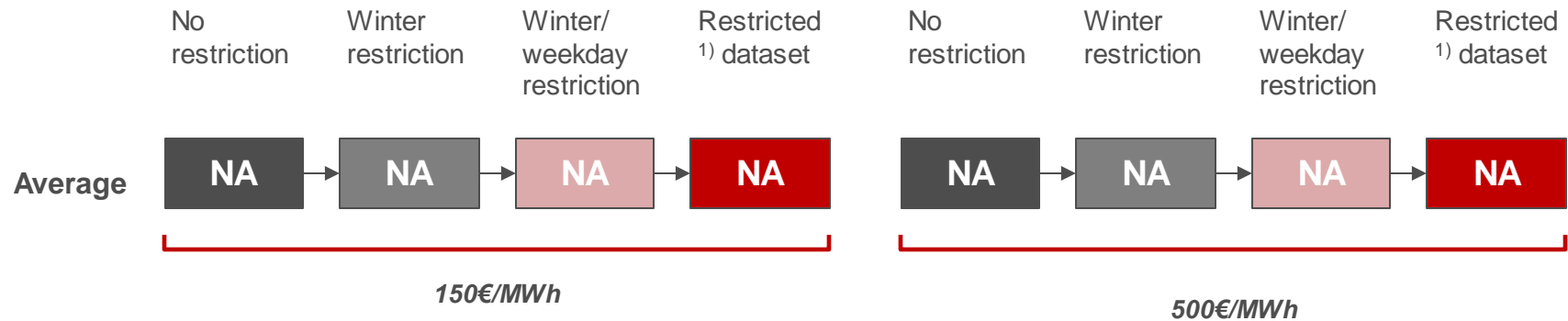


*In 2019/2020 the refined data (Sd & Average) contains the winter restriction MR value

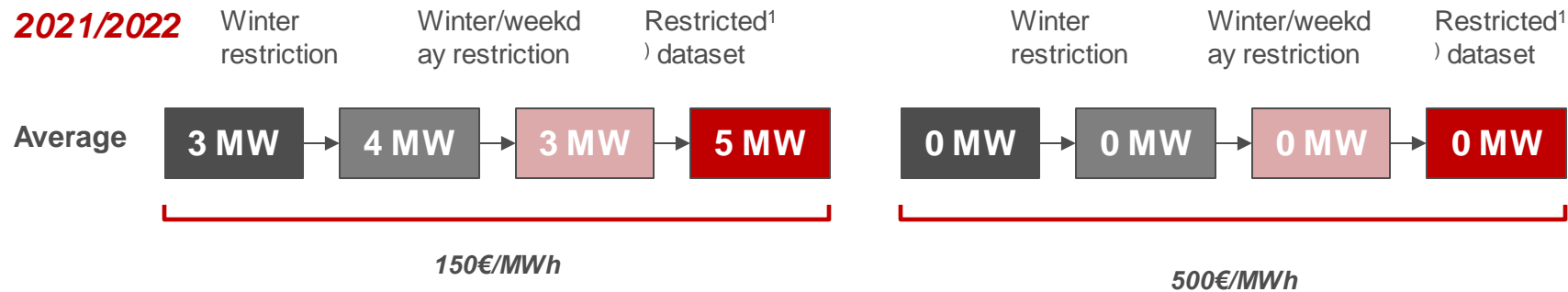
MR for Block Orders from Nord Pool was only of 5MW in 21/22 and only for the 150€/MWh threshold

MR FOR NORD POOL BLOCK ORDERS FOLLOWING THE DIFFERENT DATA RESTRICTIONS

2020/2021



2021/2022



Note : The nature of Block orders makes it that there are no Std deviation data
Source: E-CUBE Strategy Consultants

1) Restricted data = winter, weekdays, peak hours

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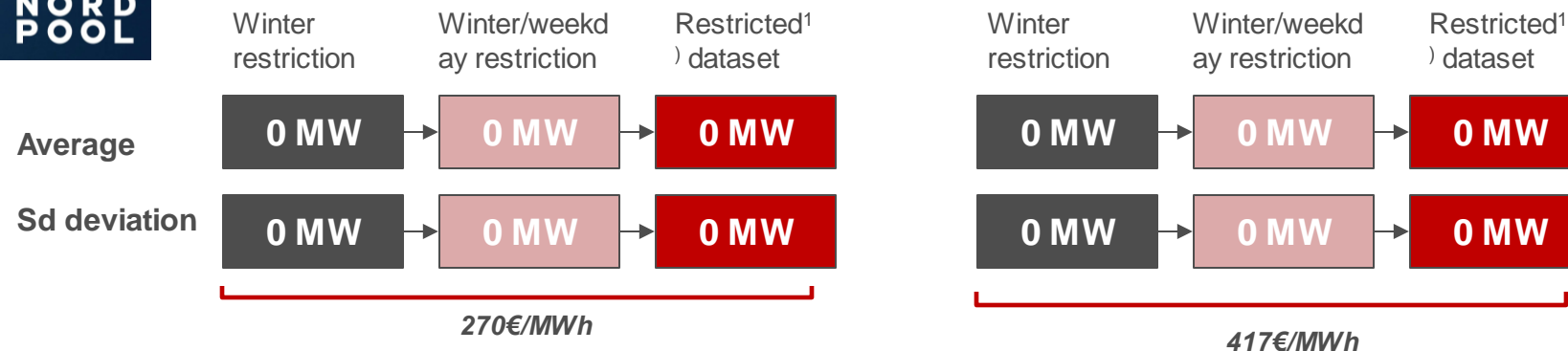
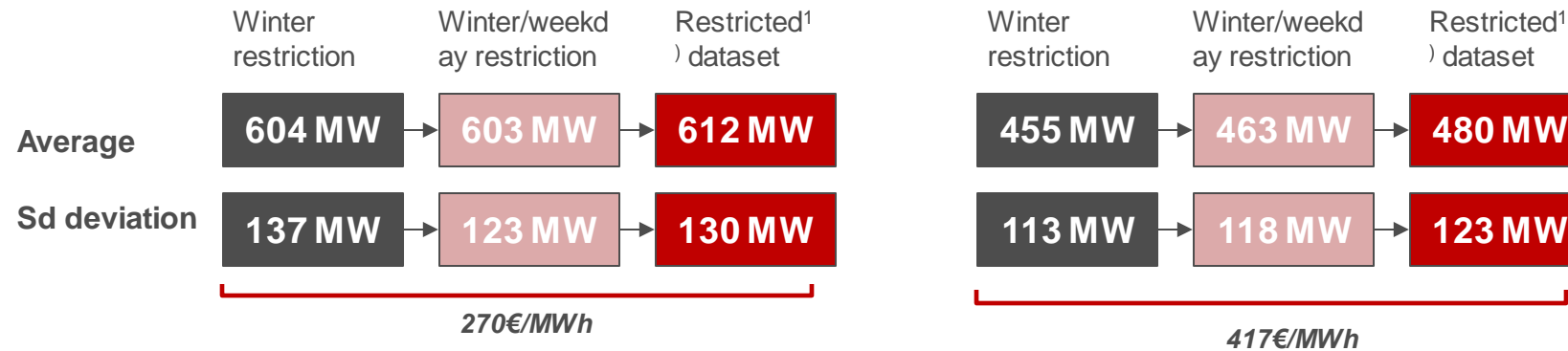
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In 2020/2021, the average MR is respectively 612 MW & 480 MW for the 270€/MWh and 417€/MWh strike price thresholds

MR AND STD FOR EPEX SPOT & NORD POOL AGGREGATED CURVES FOR THE DIFFERENT DATA RESTRICTIONS

2020/2021

> epexspot

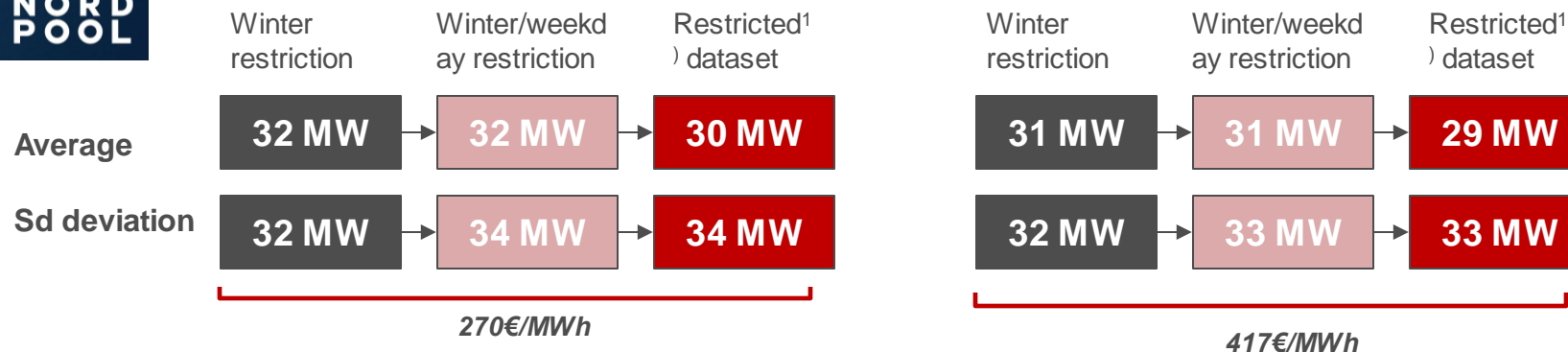
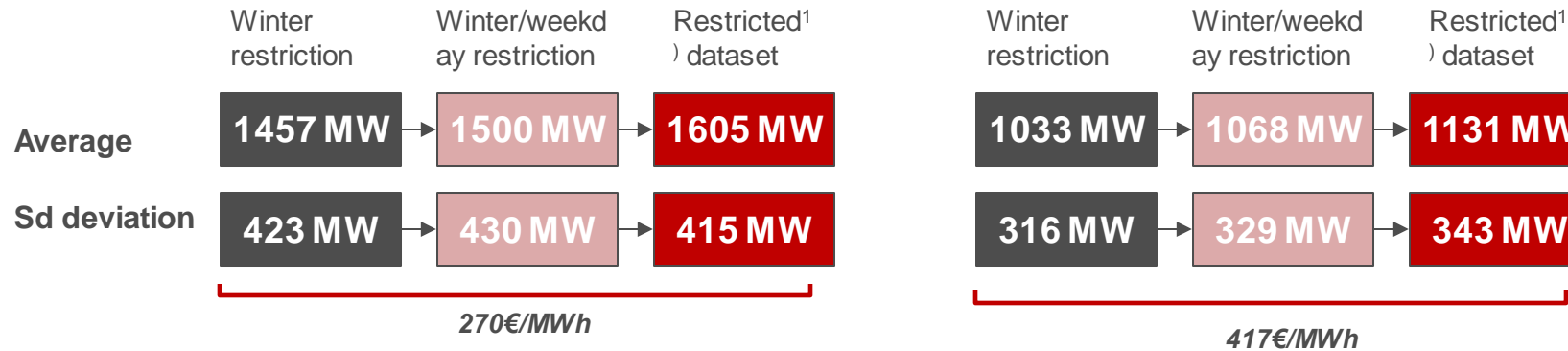


In 2021/2022, the average MR is respectively 1635 MW & 1160 MW for the 270€/MWh and 417€/MWh strike price thresholds

MR AND STD FOR EPEX SPOT & NORD POOL AGGREGATED CURVES FOR THE DIFFERENT DATA RESTRICTIONS

2021/2022

> epexspot



Ancillary services represent 350 MW in 2020/2021 and 360 MW in 2021/2022

CALCULATION OF ANCILLARY SERVICES

To calculate the volume of ancillary services we took the weighted (by demand response) sum of :

	<i>2020/2021</i>	<i>2021/2022</i>
1) FCR (Frequency Containment Reserves)	25 MW	45 MW
2) aFRR (Automatic Frequency Restoration Reserves)	6 MW	24 MW
3) mFRR (Manual Frequency Restoration Reserves)	340 MW	340 MW
	+	
	<hr/> 371 MW	409 MW

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The update of the study leads to a 959 MW Market Response for 2020/2021 and 1.384 MW for 2021/2022

OUTPUT OF MR VOLUMES

Output 2020/2021

Market Response Volume **959 MW¹⁾**

Output 2021/2022

Market Response Volume **1.384 MW²⁾**

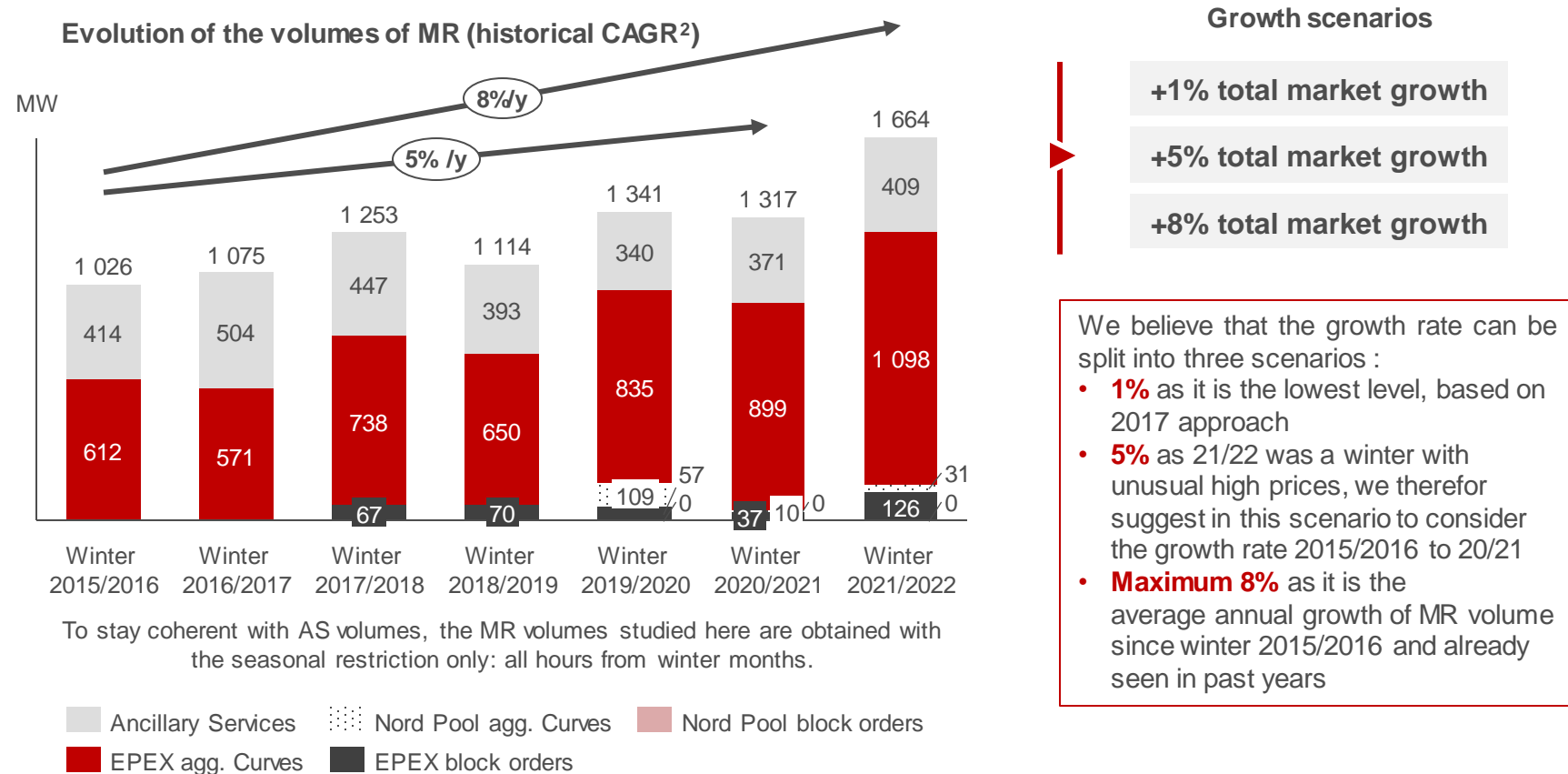
1) 150 €/MWh winter peak hours taken as basis (restricted hours)

2) 500 €/MWh winter peak hours taken as basis (restricted hours)

Source: E-CUBE Strategy Consultants

The historical long-term evolution of total Market Response is around 8%

EVOLUTION OF THE VOLUMES OF MARKET RESPONSE - WINTER MONTHS¹⁾ & GROWTH SCENARIOS



Note :

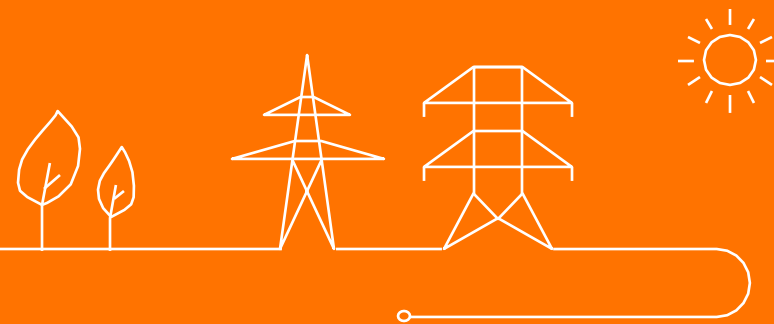
1) Winter months: from the 1st of November to the 31st of March, Volumes for **lower bound** (150€/MWh) 15/16 to 20/21. 500€/MWh for the Winter 2021/2022

2) CAGR : Compound Annual Growth Rate

Source: E-CUBE Strategy Consultants, Elia



CRM: proposal for design evolutions



Context and goal of the design evolutions

Following feedback during the public consultation of the FR v2 and as a result of additional stakeholder feedback, Elia initiated a design review of the CRM. There are some caveats:

- The proposals presented in this presentation form the starting point of a discussion for an evolution of the CRM design.
- The bilateral stakeholder discussion which Elia had do not serve as a public consultation, the proposals will be consulted upon as part of the functioning rules (where applicable) and after discussion in the working group.
- Elia aims to include as many of the proposals as possible in the FR v3 but acknowledges that certain design changes might require a change to the legal framework.

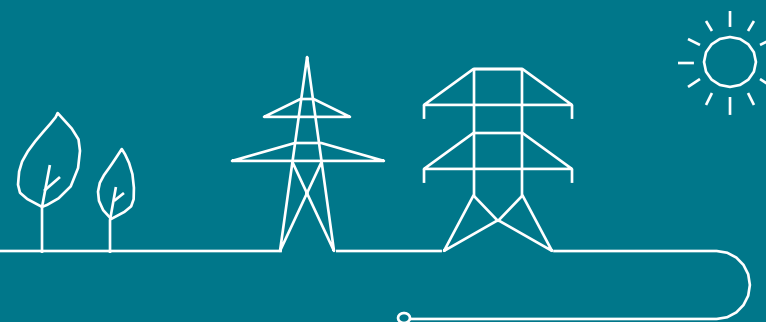


CRM design elements

	Evaluation
1) Review of payback obligation modalities	➤ Addressed
2) Review NRP determination	➤ Addressed
3) CRM should be " winter " product	➤ Addressed
4) Tests for demand response are too strict (in line with SLA, e.g. testing full nominal capacity for 6 hours)	➤ Addressed
5) Facilitate participation of low voltage flexibility	➤ (will be) addressed (together with DSOs)
6) Administrative simplification (grid user declaration (DP ID), CO ₂ , renunciation of operating aid, ...)	➤ (will be) addressed
7) Battery degradation could be better considered in CRM design	➤ Addressed
8) Permit request too strict for battery projects 4 years ahead of delivery period. There is still sufficient time for such projects to get the necessary permits after the auction.	➤ Not addressed
9) Impact of derating factor improvement/reduction	➤ Addressed

CRM design evolutions

Prequalification Processes



NRP determination

AS IS

Historical method

- Based on 12 months historical data
- Split into periods of 36 hours
 - For injection: max. variation over 36 hours
 - For offtake or injection/offtake: max. variation over 36 hours, but considering Unsheddable Margin

PQ test (in line with above principles)

TO BE

Historical method ✓

- Based on 12 months historical data ✓
- No more 36-hour periods **new**
- For injection: max. injection methodology **new**
- For offtake or injection/offtake: (simplified) baseline methodology **new**

PQ test (in line with above principles) ✓

NRP determination based on Injection data

NRP

Battery
degradation

Evolution in
time

Low-
voltage

Simplification
& process



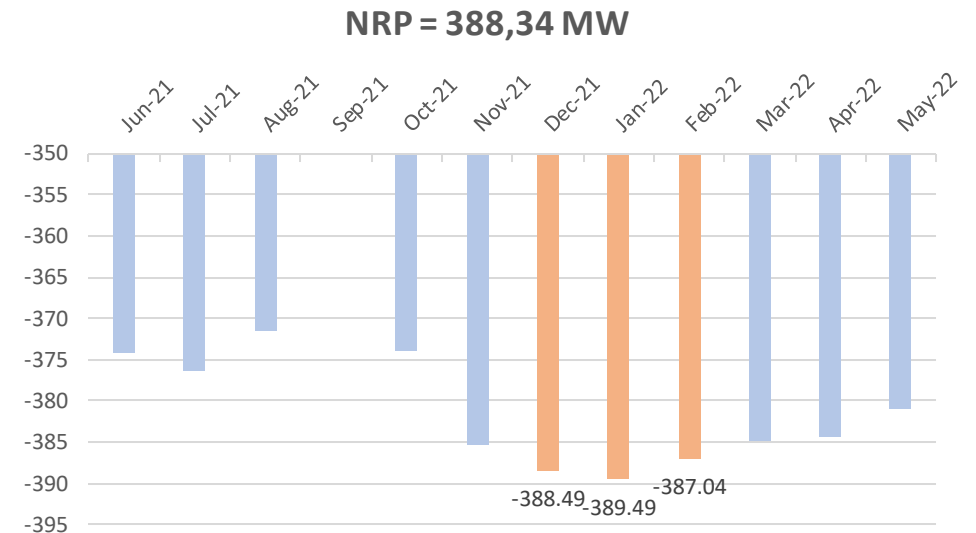
Historical method

- Considering **quarter hourly values over a period of 12 months***, ending 5 WDs before the last day of the month preceding the PQ file submission date;
- The period is subdivided into time periods of **1 month**;
- For each month, the **lowest quarterly value** is determined (which is maximum injection, as injection values are negative);
- **NRP is determined as the average over the lowest three quarter hourly values**

PQ test

- **Test date** is defined;
- **NRP is determined as the lowest quarter hourly value observed during the test period, i.e. the 24 hours of the test date**

**For linked capacities, the sum of the quarter hourly values across all linked capacities will be considered to determine the NRP. However, to establish the NRP per individual DP/CMU, the same calculation will be done per DP/CMU and these results will be used to allocate the NRP over the individual DPs/CMUs.*



NRP determination

based on Offtake or Offtake/injection data

NRP

Battery
degradation

Evolution in
time

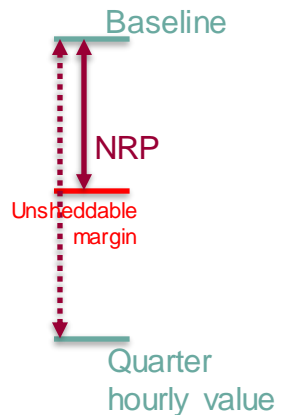
Low-
voltage

Simplification
& process



Historical method

- Considering **quarter hourly values over a period of 12 months**, ending 5 WDs before the last day of the month preceding the PQ file submission date;
- For each quarter hour part of a weekday or weekend, a **baseline** is established as follows:
 - For quarter hourly values part of a **weekday**, the **average of the four highest out of the five preceding** comparable quarter hourly values;
 - For quarter hourly values part of a **weekend**, the **average of the two highest out of the three preceding** comparable quarter hourly values;
- For each of the above quarter hours, the difference is calculated between on the one hand its baseline and on the other hand, the quarter hourly value or the specified Unsheddable Margin, whichever is highest;
- **NRP is determined as the maximum over all calculated values.**

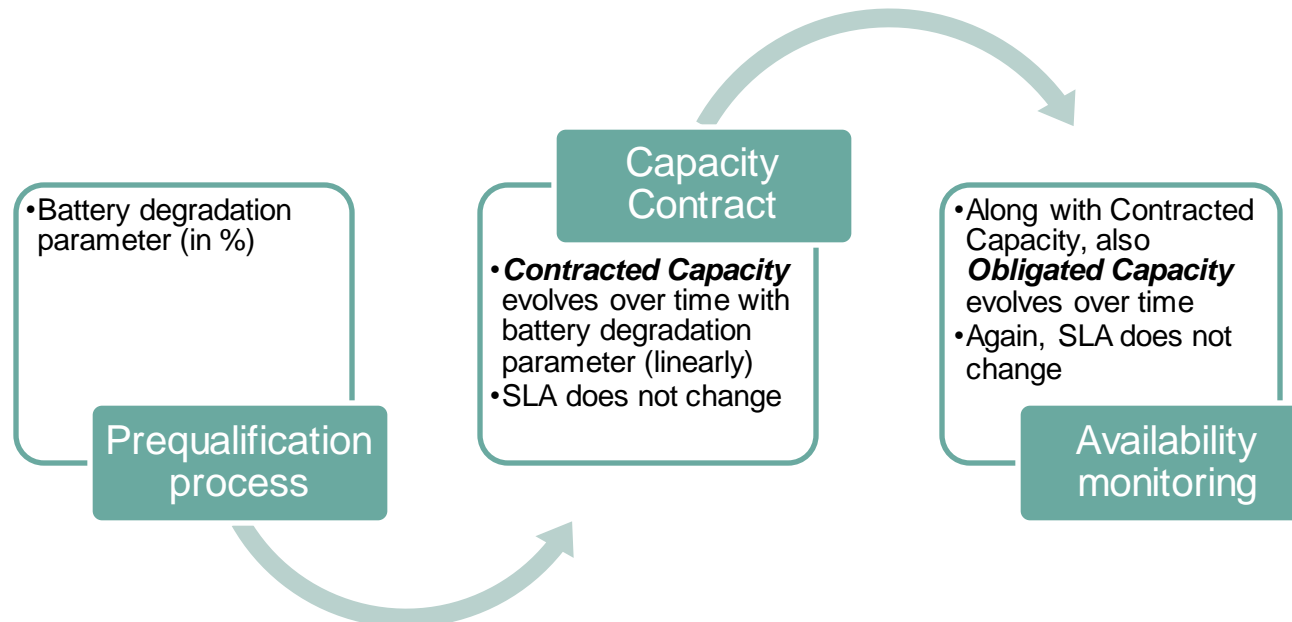


PQ test

- **Test date** is defined;
- **NRP is determined as the difference between a baseline and the average quarter hourly value measured during the test period, e.g. 1 hour.**

Battery degradation

More and more (large) batteries are being connected to the grid and show interest to participate in the CRM. Therefore, it becomes relevant to introduce a specific **battery degradation parameter** to allow **batteries** that go for a **multi-year contract** to **maximize the capacity offered in the CRM, without them needing to resort to opt-out.**



Note that towards the next Auctions (for Delivery Period 2 and following), the battery degradation volume is reconsidered each time during the Prequalification Process:

- The Remaining Eligible Volume is each time calculated as: $(NRP - \text{opt-out}) * \text{Derating Factor} - \text{Contracted Capacity}$;
- Hence, the **volume related to the degradation will be part of the Remaining Eligible Volume** and so should be offered in the Auction or part of an upfront opt-out notification.

Evolution in time of a CMU

The rules regarding evolution in time of a CMU specify **what to do/what can be done with an already prequalified CMU by the CRM Actor or by ELIA** after being engaged in a Transaction or towards a new Transaction (auction or secondary market, already contracted or not, etc.).

The objective of reviewing the evolution in time rules, which become more relevant as more and more auctions are held (hence, work in progress), is to:

- Clarify the rules;
- Simplify the rules;
- Align with IT implementation (tools, data model,...).

Low-voltage flex participation to CRM

- Strong link with the DSOs;
- Some blocking points have already been identified that currently obstruct the participation of low-voltage flexibility and which have resulted in the following specifications in the CRM Candidate – DSO agreement: **users > 1kV** and **AMR (Automatic Meter Reading)** requirement;
- Elia will further engage in discussions with the DSOs

Participation threshold

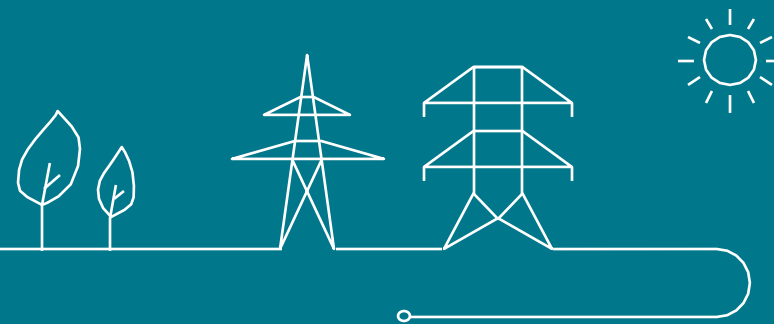
- Will be investigated if this threshold needs to be reviewed downwards, also in light of facilitating the low-voltage flex participation;
- This revision should have no impact on the mandatory participation threshold though (to remain at 1MW after derating);
- Elia will take up this point with the FPS Economy

Simplification & process

- Idea is to replace templates as much as possible with simple tick boxes, to give more flexibility to candidate in terms of timings to exchange info, etc.;
- Elia is currently working on this

CRM design evolutions

Impact of Derating factor evolutions



In its approval of the Functioning Rules V2, CREG has requested Elia to investigate some changes on the derating factor evolution

- Scope of change request CREG entails the **energy-constrained CMUs**

→ No changes apply for non energy-constrained CMUs.

- **General principle of CREG proposal for energy constrained CMUs : additional volumes can only be offered in case of an increased obligation**

Additional volumes that can be offered in the auction	Additional volumes that are blocked from the auction
Increase of Nominal Reference Power	Increase of derating factor following an update of the calibration:
Decrease of Opt-out volumes	→ Availability monitoring on Nominal Reference Power, so no additional obligation for the CMU.
Increase of derating factor resulting from more strict SLA selection → CMU has to deliver a higher service level	→ Additional contribution to SoS is covered via a correction in the demand curve (<i>“free additional MWs”</i>).

⇔ **FR V2: additional contribution to SoS could be rewarded, even if availability obligation remains unchanged**

→ **Calculation of eligible volume for the auction & secondary market should make use of the correct derating factors to reflect the principles above (⇔ FR V2: use DRF of most recent transaction).**

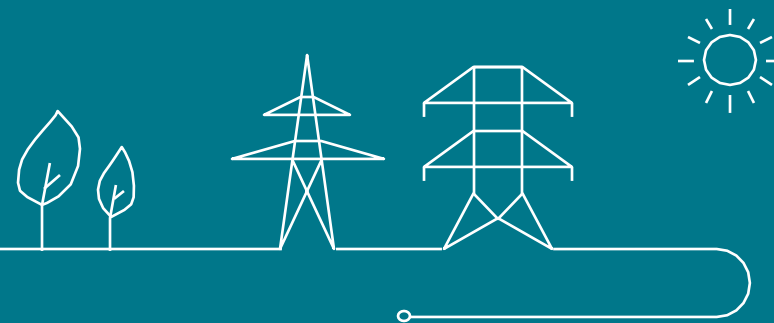


Summary of impact for energy constrained CMUS of CREG proposal

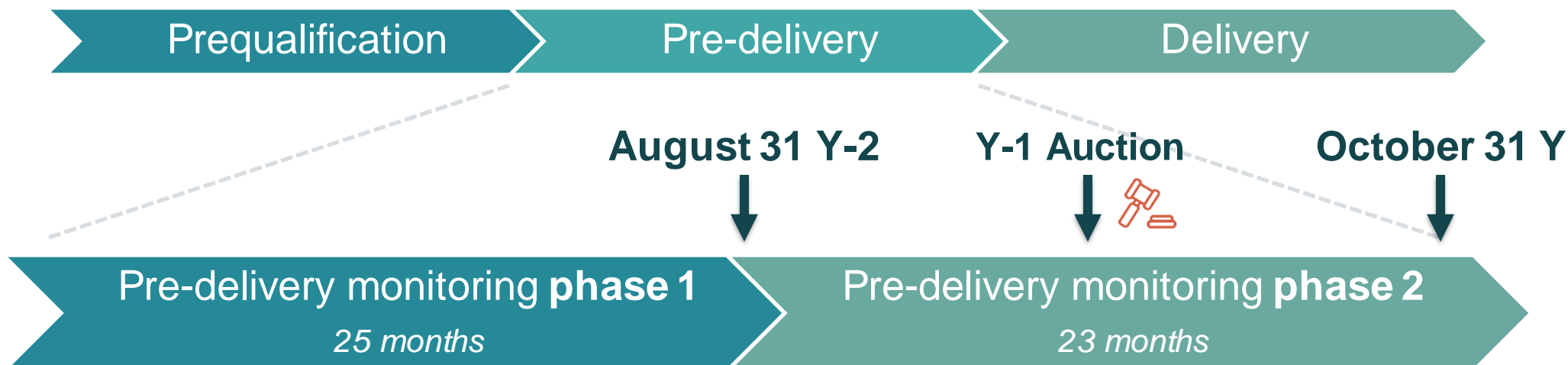
	DRF decrease	DRF increase
Capacity remuneration	<ul style="list-style-type: none"> ✓ On fixed contracted capacity (no impact of DRF decrease) 	<ul style="list-style-type: none"> ✓ On fixed contracted capacity (no impact of DRF increase)
Availability Monitoring	<ul style="list-style-type: none"> ✓ In function of Nominal Reference Power → no impact in case of decrease derating factor. 	<ul style="list-style-type: none"> ✓ In function of Nominal Reference Power → no impact in case of increase derating factor.
Participation to Auction	Not applicable (no additional volumes to contract)	 <ul style="list-style-type: none"> ✓ Additional derated capacity can be offered in the auction. ✓ If selected, <ul style="list-style-type: none"> ✓ Increase of contracted capacity & remuneration. ✓ No increase in availability obligation, but higher SoS.
Participation to Secondary Market	Not applicable (no additional volumes to contract)	 <ul style="list-style-type: none"> ✓ Additional derated capacity can be offered in secondary market (cf. most recent published derating factor). ✓ If selected, <ul style="list-style-type: none"> ✓ Increase of contracted capacity and remuneration. ✓ No increase in av. obligation, but higher SoS.
Dummy bid	<u>Increase</u> volume to procure in demand curve in function of <u>decreased</u> derating factor.	<u>Decrease</u> volume to procure in demand curve in function of <u>increased</u> derating factor.

CRM design evolutions

Pre-delivery Monitoring



On August 31 2023, the first $t_{control\ 1}$ will take place



- Determination of Missing Volume through measurements
 - Historical data
 - Requested pre-delivery test
- For CMUs linked to DSOs, data would need to be provided to Elia
- Elia has 20 WD to complete the pre-delivery activity report
- Elia proposes that the DSOs have **10 WD** to provide the data
 - With data that is at that point available and validated

Proposal: strengthen link between PQ and Pre-delivery

1. Completely align the volumes determination for Prequalification and Pre-delivery

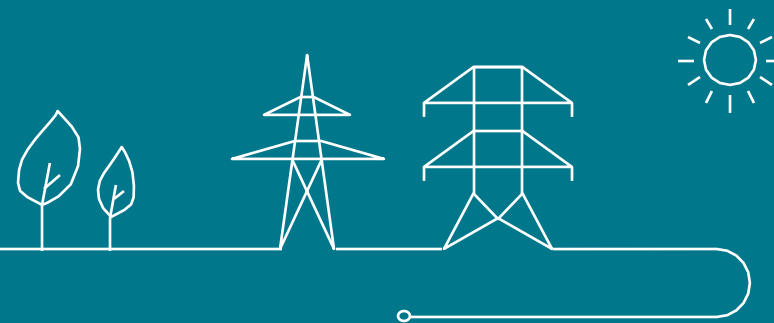
- Both for determination based on historical data and pre-delivery test
- Main difference: historic data over a 12-month rather than a 15-month period

2. A new volume determination for an Existing CMU is not necessary if over the last year a determination also happened in the framework of

- PQ for other Delivery Periods
 - Parallel Pre-delivery Periods
 - NRP determination for changing from Additional to Existing CMU
-
- Avoids unnecessary work, both for Elia and the Capacity Provider
 - The CMU can request an updated volumes determination when he does not want to make use of past results

CRM design evolutions

Availability Obligation



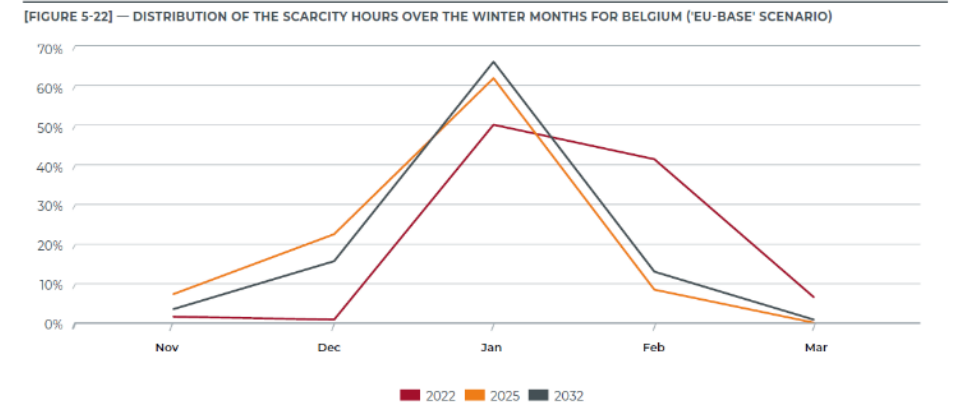
Market parties have at multiple occasions expressed their concerns about the availability tests

- Availability Tests are aimed at CMUs with high occurrences of Unproven Capacity or failed instances of Availability Monitoring
 - In practice, these will mainly target DSR
- Market parties have drawn the attention to two main concerns
 - The timing of tests: testing could occur when DSR-units are not available, such as during Summer
 - The costs of tests: testing for full SLAs at moments with relatively low prices would result in major losses
- The existing principles of Availability Testing are solid, but could be refined in the upcoming update of the Functioning Rules



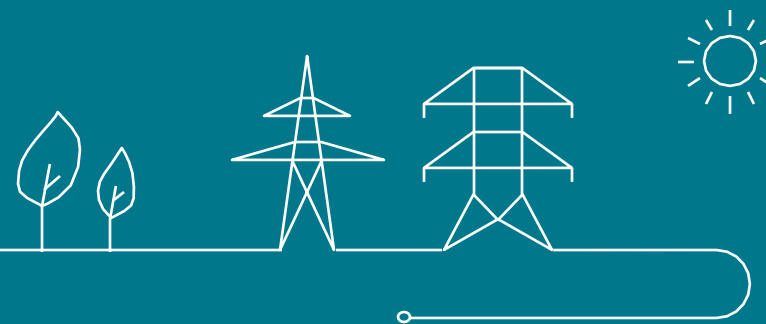
Proposal: restrict the potential moments and duration of an Availability Test

- As is:
 - No clear-cut restrictions in FR, but Elia has committed in slides that it will “avoid days with particularly low risk on adequacy”
 - A CMU can immediately be tested for its full SLA
- To be:
 - Elia will analyze the monthly scarcity situations based on the best available information. This can result in the absence of Availability Tests during the summer.
 - Note that this does not remove the Availability Obligation:
 - Availability Monitoring remains active
 - In first instance, only testing for a quarter hour
 - Only if a previous test failed, tests for full SLA are possible
 - A CMU can always request a test on its own that will always be a quarter hour to avoid a future full SLA test



CRM design evolutions

Payback obligation

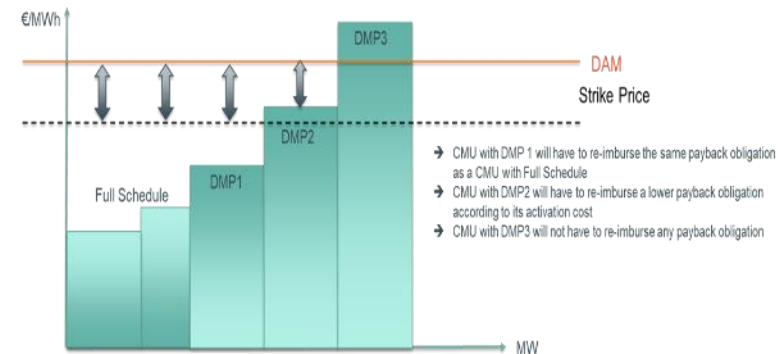


Payback Obligation: reminder of the design choices from the past

Reliability option has always been a compromise

- The first CRM design proposals regarding the Payback Obligation aimed at keeping the CRM as a **technology neutral** mechanism with **limited overall costs** and **avoiding windfall profits** :
 - After lengthy discussions, the idea of a **single** strike price was retained :
 - It ensured a certain level playing field between CRM participants.
 - It avoided the complexity of multiple strike prices.
 - It was also decided not to consider any payback exemptions linked to e.g. hedging as such behavior eventually boiled down to an **individual** market actor's choice.
 - However, the concept of a single strike price was complemented with its possible substitution by a **Declared Market Price (DMP)** for units without a daily schedule :

- The underlying idea behind such DMP was to avoid that such units would not have to payback at the level of the calibrated strike price if it did not cover their high activation costs.



- An indexation mechanism looking at the evolution of DA prices between the auction and the second delivery period was also foreseen for multi-year contracts according to the Royal Decree Methodology.
- Following a **repeated feedback** from market parties on the Payback Obligation given the current market prices and following Haulogy's recommendations on the matter, Elia understands the need to reconsider some design aspects of the Payback Obligation.

Payback Obligation: reminder of the main design objectives

The design of the Payback Obligation should find a balance between capturing windfall profits and technology neutrality/openness

- The design of the Payback Obligation mechanism should respect certain principles highlighted in European Commission decision on the Belgian CRM (306) :

*“There should be a realistic chance of being exposed to the strike price in the event of peak prices to **avoid windfall profits**”*

*“Capacities should not be excluded from the CRM in case they only activate a market price higher than the strike price level” // **technology neutrality/openness***

- This is confirmed by the Royal Decree Methodology as well :

- *“27§ 1. De methodologie voor de kalibratie van de uitoefenprijs bestaat erin om een actualisering van het niveau van de uitoefenprijs te bepalen binnen een vooraf bepaald spectrum, waarbij ervoor wordt gezorgd dat in de eenvormige day-aheadkoppeling een **redelijk capaciteitsvolume wordt aangeboden en in de eenvormige day-aheadkoppeling wordt gekozen vooraleer de uitoefenprijs bereikt is.**”*

→ From the above and following unexpected recent events in the energy market, the current design of the Payback Obligation does not seem to fit anymore with the above-mentioned principles :

- The current strike price kept ‘as is’ would potentially lead to **persistent payback obligation events** for certain technologies (exceeding the realistic aspect of it) and could **prevent their participation** to the CRM.
- Moreover, Elia has been repeatedly informed by several market parties that the current Payback Obligation design is perceived as a **barrier of entry to the CRM**.

- Finally, taking into account feedback from market parties to improve and modify the payback obligation design was crucial for the European Commission to approve the payback obligation modalities:

“The Commission also notes that the mechanism of the payback obligation in the Belgian CRM has been significantly modified and improved following public consultations. (514) The Commission therefore considers that the mechanism of the payback obligation strikes the appropriate balance between the two competing goals referred to in recital (512).”

Current issue: given current prices and repeated feedback from several market parties, a redesign of the payback obligation might be needed
new design proposals seem inevitable

- Current design

	Daily Schedule	Non-Daily Schedule
Energy Constrained	Single strike price	Declared Market Price
Non-Energy Constrained	Single strike price	Declared Market Price

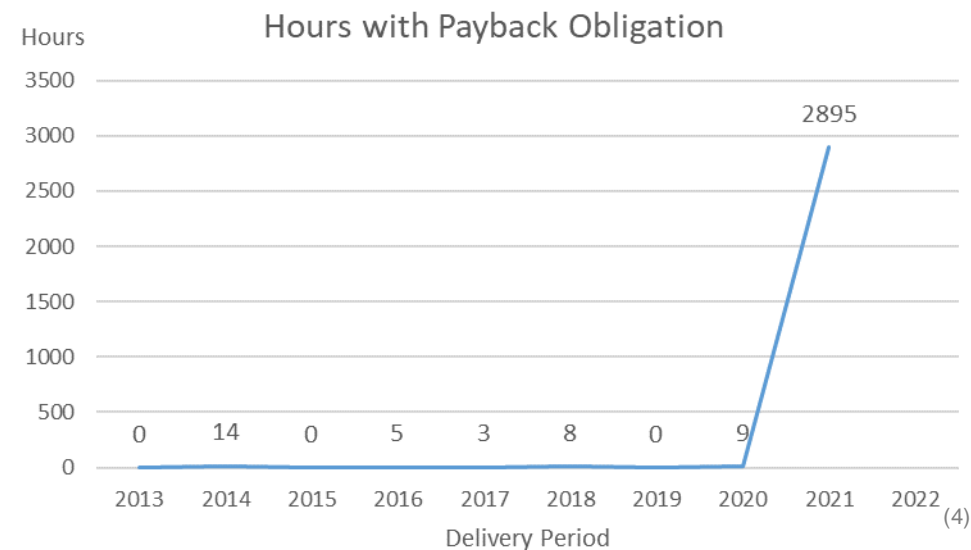
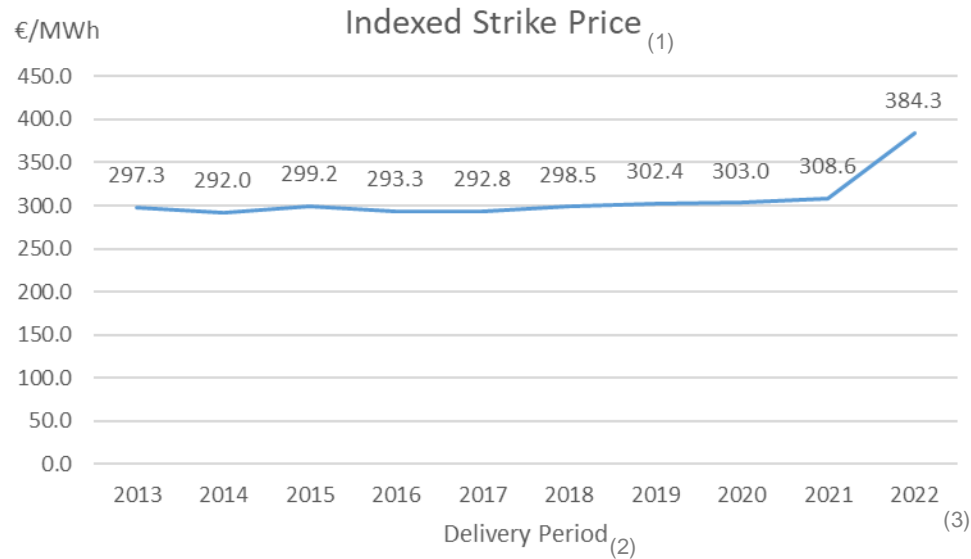


- Possible design solution

	Daily Schedule	Non-Daily Schedule
Demand response	N/A	Payback obligation exemption
Other	Redesign of calibration of uniform strike price.	Declared Market Price (no change)

Retroactive application of the design changes has to be investigated

The current design does not seem to prove adequate for the current sharp increases in price



- Applying the current Payback Obligation design on historical prices shows that the indexed Strike Price would result in a persistent amount of payback occurrences pre-2021.
- The current indexation method proves inadequate to deal with soaring energy prices, resulting in persistent Payback Obligation events.
- A redesign of such mechanism should ideally be able to deal with unexpected sustained price increases.

Remarks:

- (1) Based on a Strike Price of 300 €/MWh indexed on historical prices based on the formula 'as is'.
- (2) Delivery Period is defined as 01/11/Y – 31/10/Y+1
- (3) Only prices until 08/09/2022 are used
- (4) prices for DY 2022 are not available

Several market parties proposed repeatedly an exemption on the payback obligation for demand response capacities.

Situation:
 Added value of production = 500 €/MWh
 Elia strike Price = 300 €/MWh
 Day-ahead (DA) price = 700 €/MWh

DSR example* :

(DMP* = 2000€/MWh) No CRM activation		
Cost of buying electricity	€/MWh	-700
Added value of production	€/MWh	500
Pay-back obligation	€/MWh	/
Net position	€/MWh	-200

(DMP* = 500 €/MWh) With CRM activation		
Cost of buying electricity	€/MWh	0
Added value of production	€/MWh	0
Pay-back obligation	€/MWh	-200
Net position	€/MWh	-200

A demand response asset that participates in CRM will incur a financial loss when high DA are above its added value both when they price the DMP at or way above the added value of production
A payback obligation cannot be justified for consumption assets,

- By nature, DSR does not generate inframarginal rents during moments of extremely high prices as they do not consume, whereas these capacities are subject to a payback obligation as soon as DMP is exceeded.
- DSR capacities cannot declare extremely high DMP (cf. example to the left) as this would imply that they need to continue consuming energy (→ producing at a loss) as long as their DMP is not exceeded to avoid availability penalties.


* Example taken from the public consultation response on the FRv2

Summary of different choices for the strike price indexation

1) When to apply the indexation of the calibrated strike price?

Ex-ante		Ex-post
Between Auction & 2 nd Delivery Period	Between Auction & 1 st Delivery Period	During the delivery period
<ul style="list-style-type: none"> ✓ Current design ✓ Only for multi-year contracts. ✓ Does not solve lag between current and past prices. 	<ul style="list-style-type: none"> ✓ Cf. Haulogy's recommendation. ✓ Use improved indexation formula. ✓ Does not solve lag between current and past prices. 	<ul style="list-style-type: none"> ✓ Monthly indexation based on the evolution of pre-defined parameter(s). ✓ Strike price follows market trends and ensures windfall profits are still captured.

2) How to calculate the ex-post monthly indexed strike price?

Increasingly tailor-made 		
DAM evolution	CO2 & gas price driven	Unit specific DMP
<ul style="list-style-type: none"> ✓ Current design is DAM-driven. ✓ Technology-neutral 	<ul style="list-style-type: none"> ✓ Less technology-neutral. ✓ Linked to marginal costs of most units in this category. ✓ EC precedents (Italy, Ireland). 	<ul style="list-style-type: none"> ✓ Not considered as it could open the door for gaming → payback obligation risks to become an empty box.

This leads to different options for the uniform strike price redesign

This overview of proposed solutions aims at summarizing considered options

	Option A: As Is	Option B: Haulogy proposal	Option C: Ex-post indexation DA	Option D: Ex-post indexation based on fuel and CO ₂ prices	Option E: Combination of max (B & D)	Option F: A or B + more granular stop-loss
What	<ul style="list-style-type: none"> - Only ex-ante indexation from 2nd Delivery Period - No ex-ante indexation for 1st Delivery Period - DAM driven 	<ul style="list-style-type: none"> - Ex-ante indexation from 1st Delivery Period (cf. Haulogy) - DAM driven - Complemented with finetuned indexation formula 	<ul style="list-style-type: none"> - DAM driven. - On a monthly basis 	<ul style="list-style-type: none"> - Gas prices and CO₂ prices driven - On a monthly basis 	<ul style="list-style-type: none"> - Ex ante indexation with a back-stop mechanism in case of price shocks in fuel markets 	<ul style="list-style-type: none"> - Monthly or weekly stop-loss
+	<ul style="list-style-type: none"> - Simple - Fixed strike price, lower uncertainty for the delivery period 	<ul style="list-style-type: none"> - Simple - Relieves some concerns on LT market trends 	<ul style="list-style-type: none"> - Takes into account ST evolution. - Technology neutral. - Captures windfall profits 	<ul style="list-style-type: none"> - Takes into account ST evolution of underlying price drivers. 	<ul style="list-style-type: none"> - Addresses current concerns of high prices - Impact of fuel prices in extreme situations covered 	<ul style="list-style-type: none"> - Simple - Further decreases risk in case of temporary market trends.
-	<ul style="list-style-type: none"> - Does not solve lag between historical and current prices. - Does not address concerns raised by stakeholders 	<ul style="list-style-type: none"> - Unable to capture ST changes. - Indexation based on DAM might not consider evolution of specific drivers such as changes in merit order. 	<ul style="list-style-type: none"> - Indexation based on DAM might not consider evolution of specific drivers such as changes in merit order. 	<ul style="list-style-type: none"> - Complex determination of indexation formula - Selected fuel sources might not determine DAM in the long term. 	<ul style="list-style-type: none"> - Decrease of market prices lags (hence longer time with high strike price) 	<ul style="list-style-type: none"> - Not a solution when prices remain above strike price structurally. - Risk of reducing the efficiency of the Payback Obligation

Formulas of proposed solutions regarding the strike price indexation (1/3)

Option B : Haulogy proposal with adapted indexation concept

- Indexation as of the 1st Delivery Period and proposed fine-tuning of the indexation formula to better cope with structural market evolutions between the calibration of the strike price and the start of the delivery period.

$$\begin{aligned} & \text{Indexed Calibrated Strike Price } (CMU_{id}, Transaction_{id}, t) \\ & = \mathbf{Factor}(t, \text{Auction year}, \text{Auction type}) * \text{Calibrated Strike Price } (CMU_{id}, Transaction_{id}, t) \end{aligned}$$



- Indexation factor 'as is' : as proposed by Haulogy in their study

$$\begin{aligned} & \text{Factor}(t, \text{Auction year}, \text{Auction type}) \\ & = 1 + \frac{\text{Average DAM } (DPe_t - 3 \text{ to } DPe_t - 1) - \text{Average DAM } (\text{Auction year} - 3 \text{ to } \text{Auction year})}{\text{Calibrated Strike Price } (\text{Auction year})} \end{aligned}$$

- Proposed indexation factor 'to be' : as proposed by Elia



Question : is there a need to consider a floor/cap for the indexed strike price ?

$$\begin{aligned} & \text{Ex - ante indexation factor } (t, \text{Auction year}, \text{Auction type}) \\ & = 1 + \frac{\text{Average DAM } (DPe_t - 3 \text{ to } DPe_t - 1) - \text{Average DAM } (\text{Auction year} - 3 \text{ to } \text{Auction year})}{\text{Average DAM } (\text{Auction year} - 3 \text{ to } \text{Auction year})} \end{aligned}$$

This indexation formula is a preliminary example for illustrative purposes.

Formulas of proposed solutions regarding the strike price indexation (2/3)

Option C : ex-post indexation DA

- Ex-post indexation occurring on a monthly basis based on DA prices in order to take into account short term price evolution

$$\begin{aligned} & \text{Ex - post indexed Calibrated Strike Price } (CMU_{id}, Transaction_{id}, t, m) \\ & = \text{Ex - post indexation Factor } (m, DPe_t, DAM_m) * \text{Calibrated Strike Price } (CMU_{id}, Transaction_{id}, t) \end{aligned}$$



- With as ex-post indexation factor :

$$\text{Ex - post indexation factor } (m, DPe_t, DAM_m) = \frac{\text{Average DAM}_m(\text{last year that ends at start month } m)}{\text{Average DAM (Auction year - 3 to Auction year)}}$$



$$\begin{aligned} & \text{Ex - post indexed Calibrated Strike Price } (CMU_{id}, Transaction_{id}, t, m) \\ & = \frac{\text{Average DAM}_m(\text{last year that ends at start month } m)}{\text{Average DAM (Auction year - 3 to Auction year)}} * \text{Calibrated Strike Price } (CMU_{id}, Transaction_{id}, t) \end{aligned}$$



Questions/aspects to be clarified :

- What is the look back horizon for the DAM?
- Is there a need to consider a floor/cap for the indexed strike price ?

This indexation formula is a preliminary example for illustrative purposes.

Formulas of proposed solutions regarding the strike price indexation (3/3)

Option D : ex-post indexation based on fuel and CO2 prices

- Ex-post indexation occurring on a monthly basis based on fuel & CO2 prices in order to take into account short term market evolution impacting potentially the merit order on DA market.
 - Since the formula would have to be based on parameters to be discussed, here's a potential example coming from the Irish CRM :

$$PSTR_m = \text{Max} \left(\frac{1}{FTHEORYPU_y} \times \text{Max} \left(PFUELNG_m + (PCARBON_m \times FCARBONING_y), PFUELO_m + (PCARBON_m \times FCARBONIO_y) \right), PTHEORYDSU_y \right)$$

where:

- FTHEORYPU_y is the Peaking Unit Theoretical Efficiency for Capacity Year, y;
- PFUELNG_m is the Natural Gas Fuel Price for Month, m;
- FCARBONING_y is the Natural Gas Carbon Intensity Factor for Capacity Year, y;
- PFUELO_m is the Oil Fuel Price for Month, m;
- FCARBONIO_y is the Oil Carbon Intensity Factor for Capacity Year, y;
- PCARBON_m is the Carbon Price for Month, m; and
- PTHEORYDSU_y is the Demand Side Unit Theoretical Price for Capacity Year, y, d.

Strike Price Component	Value	Unit
PCARBON _m	PCARBON _m Index	€/tCO ₂ e
PFUELNG _m	[PFUELNG _m Index (p/therm) x 0.01 (€/p) + PFUELNG _m Transport (€/therm)] x Exchange Rate (€/€) x 9.48 (therm/GJ) x 3.6 (GJ/MWh)	€/MWh
PFUELO _m	[PFUELO _m Index (\$/t) x Exchange Rate (€/€) + PFUELO _m Transport (€/t)] x 0.025 (t/GJ) x 3.6 (GJ/MWh)	€/MWh
PCARBON _m Index	ICE ECX EUA Futures – EUA - (monthly) ¹⁴	€/tCO ₂ e
PFUELNG _m Index	ICE UK Natural Gas Index (monthly)	p/therm
PFUELNG _m Transport	0.0424 ¹⁵	€/therm
PFUELO _m Index	Platt's Forward Curve (monthly) for monthly swap transactions for 1% sulphur free on board (FOB) fuel oil cargoes in North West Europe (NWE) for the relevant month (AAEGR00)	\$/t
PFUELO _m Transport	50 ¹⁶	€/t
FTHEORYPU _y	15	%
FCARBONING _y	0.202	tCO ₂ e/MWh
FCARBONIO _y	0.277	tCO ₂ e/MWh
PTHEORYDSU _y	500	€/MWh
Exchange Rate (€/€)	The Trading Day Exchange Rate as defined in the Trading and Settlement Code	€/€
Exchange Rate (€/€)	The rate set at 17:00 the day before the Trading Day, from the same source as used for the Trading Day Exchange Rate	€/€
therm per GJ	9.48 ¹⁷	therm/GJ
LSFO calorific value	0.025 ¹⁸	t/GJ

This indexation formula is a preliminary example for illustrative purposes.

Summary and evaluation of the different options proposed

- Possible design solution

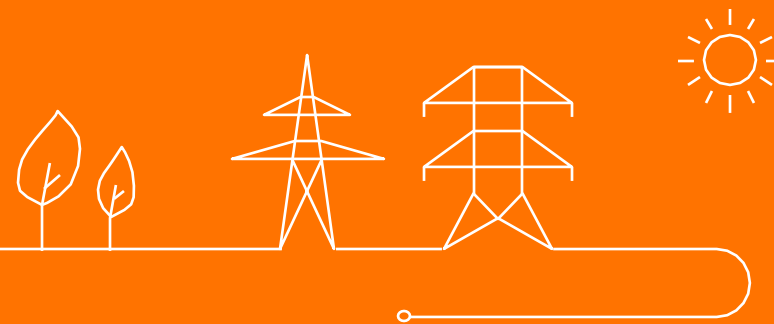
	Daily Schedule	Non-Daily Schedule
Demand response	N/A	Payback obligation exemption
Other	Redesign of calibration of uniform strike price.	Declared Market Price (no change)



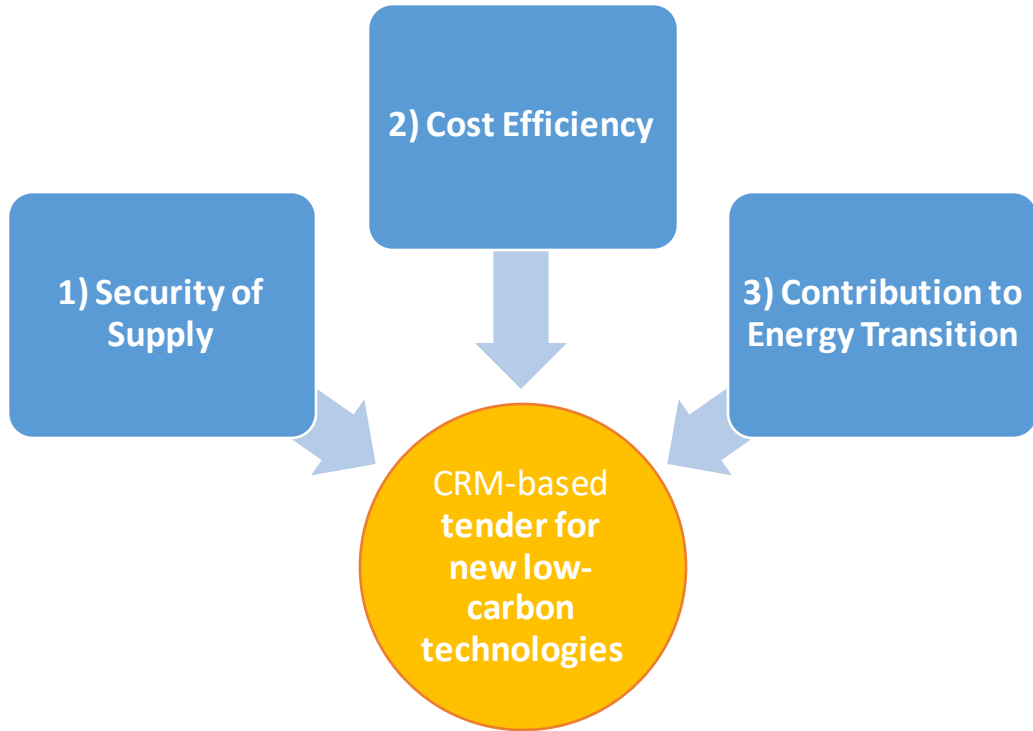
For new contracts, a monthly indexation of the strike price based on the DAM prices (option C) seems to be a promising way forward.

For existing contracts, an ex-ante indexation based on the Haulogy proposal (option B). It is still to be investigated whether this can be applied retroactively.

Low carbon tender for '24 – '25



Reminder: The proposed solution for W24-25 aims to ensure security of supply at the lowest cost while contributing to the energy transition towards a carbon neutral society at the same time.



1

- Attract **new in-the-market capacities** to cover the need for new MWs in W24-25 to meet the legal reliability standard of LOLE = 3h.
- Design to respect the European guidelines for **capacity mechanisms**.

2

- Build further on the **CRM design** to limit additional costs for :
 - The design and implementation of the mechanism.
 - Knowledge building for market parties.
- **Only reward new capacities** : tender should be proportionate in view of the less significant gap in W24-25 compared to after '25.
- Avoid double remuneration with CRM.

3

- Eligibility criteria will include **strict CO₂ emission limits** to ensure that the selected capacities contribute to the Belgian and European targets on carbon neutrality (cf. Fit for 55, Repower EU).

- **Goal of the presentation today is to present the high-level design principles for the tender.**
- **Elia will launch a public consultation on the design note mid-October.**

Core design principles

- ✓ Only acquire **new capacities** that are not/will **not be contributing to SoS** in '24-'25 (alignment with Elia's assumptions in Adequacy & Flexibility Study '23)
- ✓ **Alignment** with **CRM** modalities and processes to **reduce barriers of entry and improve interoperability**
- ✓ **No double remuneration** (CRM & LCT or others)



Contract Duration & Eligibility

A) Contract duration

New capacities without a contract through the CRM are **allowed to bid in for Multi-Year contracts**

→ Through a combination of an LCT and a CRM contract



- *Delivery period modalities kept identical between LCT and CRM*
- *Subject to investment file to CREG (in line with CRM)*
- *1,3,8 and 15 year capacity contract durations (in line with CRM).*

B) Eligibility criteria

- 1) All existing capacities that are already contributing to SoS in '24-'25, are excluded
→ Taking into account the exact definition of contributing to SoS (*see further*)
- 2) A strict CO₂ requirement applies to only allow the participation of low carbon technologies.



Eligibility – Definition of “new” capacities

General

- Only **Additional “New Build” allowed**, according to definition CRM
- To make sure that only new capacities, not yet contributing to SoS, are procured
 - Demand response requires specific definition

DSR

- Specifically for demand response, **Additional other & Existing also allowed**, according to definition CRM
- But only when these are “*non-contributing to SoS*”/“*new*”

“*Non-contributing to SoS*”

- No explicit Demand-Response offered (Ancillary Services)
- No implicit Demand-Response offered (DA/ID market)

In the last X years before the Auction of the LCT

Example of possible rule similar to **Strategic Reserves** :

IF DAM price on a Belgian NEMO \geq xxx €/MWh

OR IF positive imbalance price \geq xxx €/MWh

→ Availability percentage of the offered capacity should be higher than xx %

To be aligned with assumptions in the Adequacy & Flexibility '23 gap determination.

The exact definition of eligible demand response capacities to be further developed in the coming weeks.

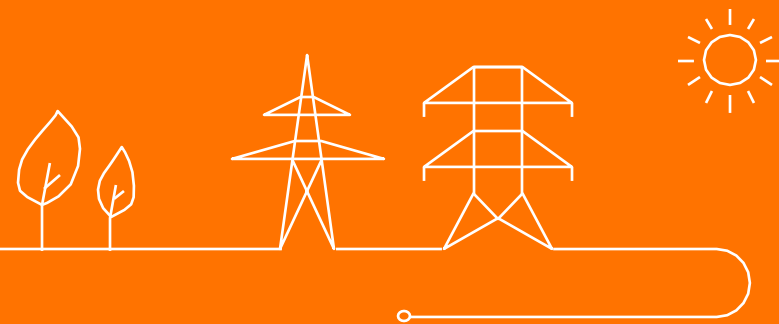


Overview of remaining main design principles

Topic	Proposal	Compatible with current CRM design
Link with CRM process	<ul style="list-style-type: none"> ✓ LCT clearing before Y-4 CRM auction. ✓ LCT prequalified capacities cannot participate in Y-4 CRM auction ('27-'28) 	Yes
Prequalification	<ul style="list-style-type: none"> ✓ No Virtual CMUs. ✓ No Fast Track. 	Yes
Pre-delivery/Financial Securities	<ul style="list-style-type: none"> ✓ No pre-delivery control for existing CMUs to avoid double testing. ✓ No financial security after contract signature for existing CMUs. 	Simplification, but requiring update of CRM FR V3.
Availability monitoring & Payback	<ul style="list-style-type: none"> ✓ No deviation from CRM design possible. 	Yes
Secondary Market	<ul style="list-style-type: none"> ✓ Opening of secondary market as of delivery period '24 – '25. 	Yes



Next meetings



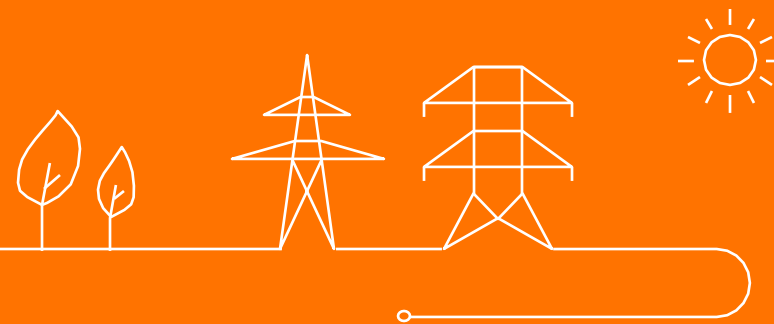
Foreseen timeslots for next meetings

- Thursday 13th October 2022 am
- Friday 28th October 2022 pm
- **UPDATE** Thursday 17th November 2022 pm
- Friday 16th December 2022 pm

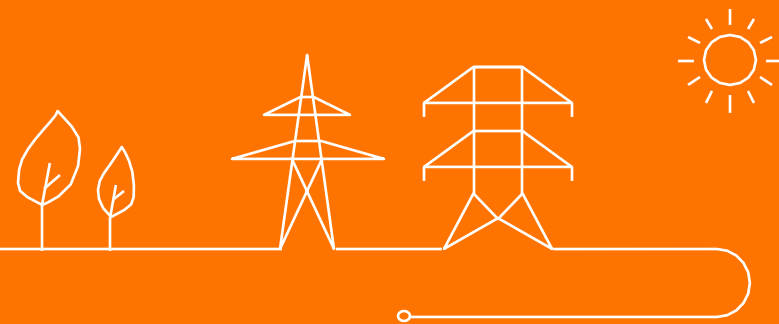
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- Thursday 29th September pm Flexibility Workshop



Thank you !



Back-up slides



Battery degradation

Example

NRP

Battery degradation

Evolution in time

Low-voltage

Simplification & process



1. The **Battery degradation parameter** (in %) submitted as part of PQ file submission = 5%; NRP = 100 MW; SLA 4 hours; Derating Factor = 50%; Investment File = 8 years;

2. CMU selected in the Auction (50MW, 8-year contract), so **Contracted Capacity** in Capacity Contract evolves as follows:

- Delivery Period 1 → Contracted Capacity = Volume of Bid selected in the Auction = 50 MW;
- Delivery Period 2 → Contracted Capacity = $(1 - \text{Battery degradation}) * \text{Volume of Bid selected in the Auction} = (1 - 5\%) * 50 = 47,5 \text{ MW}$;
- Delivery Period 3 → Contracted Capacity = $(1 - 2 * \text{Battery degradation}) * \text{Volume of Bid selected in the Auction} = (1 - 2 * 5\%) * 50 = 45 \text{ MW}$;
- ...

3. Also the **Obligated Capacity** evolves over time

- Delivery Period 1 → Obligated Capacity = $\text{Contracted Capacity} / \text{DF} = 50 / 50\% = 100 \text{ MW for 4 hours}$;
- Delivery Period 2 → Obligated Capacity = $\text{Contracted Capacity} / \text{DF} = 47,5 / 50\% = 95 \text{ MW for 4 hours}$;
- ...

4. Towards the next Auctions, the **Remaining Eligible Volume** equals:

- Auction for Delivery Period 2 → Remaining Eligible Volume = $(\text{NRP} - \text{opt-out}) * \text{DF} - \text{Contracted Capacity} = (100 - 0) * 50\% - 47,5 \text{ MW} = 2,5 \text{ MW}$;
- Auction for Delivery Period 3 → Remaining Eligible Volume = $(\text{NRP} - \text{opt-out}) * \text{DF} - \text{Contracted Capacity} = (100 - 0) * 50\% - 45 \text{ MW} = 5 \text{ MW}$;
- ...

