

USERS' GROUP



Working Group Belgian Grid



24 November 2021
Digital



Agenda



1. Approval of the MoM of the Working Group Belgian Grid of 17 September '21

2. T&C VSP – Public consultation

3. Public data exposure – questionnaire

4. WG Belgian Grid – Work plan 2022

5. Miscellaneous

5.1. Substantial modernisation

5.2. Access contract

5.3. Doodle data meetings WG Belgian Grid 2022



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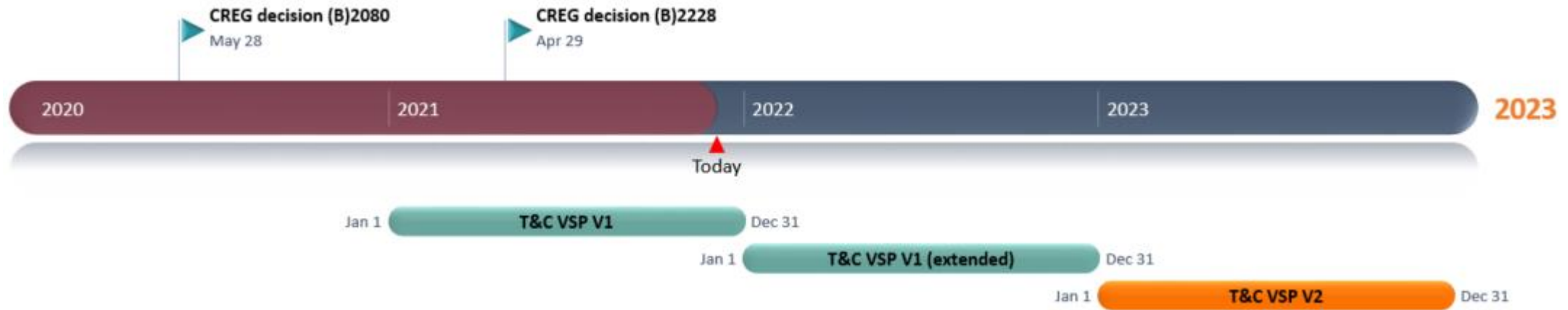
A man with short brown hair and a beard, wearing a dark blue ribbed sweater, is seated at a desk in a control room. He is looking at several computer monitors. The monitors display various data visualizations, including a large, colorful, abstract pattern of lines and dots in the background, and several smaller screens showing tables of data and charts. The man's hands are resting on his arms, and he appears to be focused on the work. The overall atmosphere is professional and technical.

T&C VSP – Public Consultation

WG Belgian Grid

24/11/2021

T&C VSP - context



The decision (B)2228 of the CREG states that a **new version of the T&C VSP is to be submitted** to the CREG for the 31 December 2021 considering:

1. The remarks included in the CREG decision (B)2080
 - Paragraphs: 10, 13, 25, 47, 55, 57, 59, 72, 82, 83, 95, 96, 100, 102, 121
2. The available return of experience from the delivery of the Service
3. The applicable legal framework at that moment



T&C VSP – Public consultation

- The document subject to consultation constitutes a **proposal of review by ELIA regarding the T&C VSP following CREG's decisions (B)2080 and (B)2228**
 - The scope of this consultation is limited to the modifications related to the Specific Conditions of the T&C VSP
 - The General Conditions are part of a [separate consultation](#) taking place at the same moment
 - No adaptation of the relevant and applicable legislation has taken place since last revision of the T&C VSP (e.g. art. 12 quinquies of the Electricity Law)
- The consultation period runs from **Friday 12th of November to Monday 13th of December 2021** included
 - For a complete information, the T&C VSP in Dutch and French will be provided during the consultation
- The **modifications** made to the T&C VSP are based on:
 1. Some of the **points from the CREG decision (B)2080** as mentioned in the previous slide
 2. Some limited return of experience resulting from **market parties feedback and questions** during the delivery of the service
 3. Some adaptation related **to coherency, wording and structure of the contract** based on Elia's analysis and discussions with the CREG according to points 57 and 72 of the CREG decision (B)2080.



T&C VSP – Modifications following CREG decision (B)2080

Section	Modification
II.3.4 b)	According to point 82 of the CREG decision (B)2080, the formulation of the last bullet has been adapted to clarify that the communication of this active power measurements is not to be performed by the VSP but that all technical units behind the same service measurement point need to be equipped with real-time active power measurements to make an aggregation possible.
II.3.7	According to point 83 of the CREG decision (B)2080, the necessity to have a BRP contract is considered as redundant and is removed from the article.
II.6.2	Pursuant to point 95 of the CREG decision (B)2080, the reference to DSO metering data has been removed from the article and the footnote is modified accordingly.
Annex 7	The terms of the formula have been better explained and an example has been added according to point 121 of the CREG decision (B)2080 requesting to clarify the formula.
Annex 11	According to point 47 of the CREG decision (B)2080, the last paragraph has been modified to precise the conditions of termination of the contract for a grid user which is obliged to provide the service.

- After discussion with the CREG, some points of the decision (B)2080 have not lead to modifications of the T&C VSP e.g.:
 - Point 13 concerning the participation mechanism for CDS/DS grid users
 - Point 59 concerning the minimum volume to provide the service that is currently set to 1 MVAR
 - Point 102 concerning the level of penalty that could be insufficient for mandatory participants that are not able to provide the service for technical, operational or other reasons.



T&C VSP – Main other modifications to articles

Section	Modification
II.1	<ul style="list-style-type: none"> The reference to the BRP is not needed anymore in the contract making the definition of the term “BRP” and “BRP contract” unnecessary The VSP contract has been aligned with the new terminology according to new SA and OPA contracts. The references to CIPU contract have been replaced in the entire contract The definition of “Compensator Mode” has been adapted in order to detail the situations of Technical Unit injecting and offtaking active power and in order to clarify the link with the minimum active power threshold. The definition of Injection Mode, Federal Grid Code and RfG have been added as they were missing in the contract The definition of “Offtake” has been removed as it is not necessary in the contract. Indeed, the contract always refers to an injection or an offtake of active power in the text. The definition of “Reactive Power Requested” or “Qreq” has replaced the two definitions of “Reactive Power Required for Remuneration” or “Qreq_rem” and “Reactive Power Required for Delivery Control ” or “Qreq_control” as one term is sufficient in the contract to refer to the volume of reactive power that needs to be provided by the VSP and that is remunerated.
II.3.3 a)	A table has been added to indicate the relevant articles of the legislation to which the technical units have to be compliant in terms of voltage and reactive power control capabilities.
II.3.10	A new article has been added following questions received from market parties concerning the determination of the technical control band in Injection mode and compensator mode.
II.3.11	This new article contains the modalities that are described in the second paragraph of the existing article II.8.4 concerning the need of a bilateral agreement between the VSP and the Access Contract Holder (ACH) as these modalities are part of the condition for participation of technical-units to the service
II.5.3	The other technical requirements encountered at such time are completed with two examples
II.3.4, II.7.1 and II.7.2	The boxes in these articles have been deleted as the information contained in these boxes is already covered in other articles/annexes of the contract

T&C VSP – Main other modifications to the annexes

Section	Modification
Annex 2.A	The structure of the annex has been improved and some numerical examples have been added in sections 2.A.1 and 2.A.2
	A paragraph has been add to clarify the daily initialization of the reactive power requested to avoid the propagation of errors following discussion with market parties during the execution of the contract in 2021.
Annex 2B	This section has been added to clarify the way the price for the remuneration is determined based on the price structure in annex 12
Annex 3 and Annex 4	The structure and the way the information is presented are improved by first presenting theoretical content before going through the examples (there is no change of content)
Annex 6	Following question from market parties raised for the contractual period 2021, the band to apply penalties are better precised by adding “included” in the three last bullet points and correcting the percentages.
Annex 8	Following questions raised by market parties for the contractual period 2021 on the way setpoint need to be considered, this annex has been totally reviewed to clarify and better explain the procedure to follow for both controlling and non-controlling technical Units (without any change in the content of the procedure)
Annex 12A	The notion of “Group” has been deleted and replaced by the direct reference to “Injection Mode” and “Compensator Mode” to clarify and simplify the wording used in the contract.
Annex 12 B	This new annex “Applicable Prices” has been added to allow indicating the applicable prices to deliver the Service in the contract

- Some other wording and structure improvements have been made in several articles and annexes as described in the explanatory note



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Public Data exposure – Questionnaire

- In order to enable the energy transition and to continue operating the electric system in an increasingly decentralized environment, Elia will have to become data and consumer centric.
- Elia already makes a lot of data publicly available through several channels.
- In building the long term public data exposure objectives and roadmap, it's essential to focus on evolutions with a high impact for the market.

Market consultation

We invite you to answer to a **Questionnaire** that will be sent after this meeting.

The objective is to understand the current use of public data by Belgian market stakeholders and the improvements expected.

The results will be communicated during a Belgian Grid meeting in 2022 and also communicated to e-mail addresses filled in the questionnaire.

We ask you to share this questionnaire with person(s) concerned by this subject in your organization.

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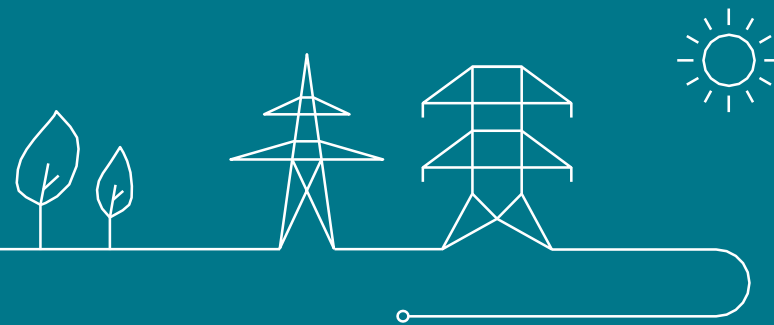
WG Belgian Grid Roadmap/work plan 2022



David Zenner
24 November 2021



Grid codes



Federal Grid Code

1. Judgment EU Court of Justice – Dec 2020

Some topics included in the FGC fall out of the competence of the executive power and should be determined by the regulator instead – namely the conditions for:

- connection and access to national networks;
- the delivery of balancing services; and
- access to cross-border infrastructures, including the procedures for capacity allocation and congestion management

2. Amendment Electricity Law – July 2021

Impacted topics were transferred to the CREG, to be included in a new Code of Conduct

3. Amendment DG and drafting of new Code of Conduct

NEW action

- DG Energy and CREG currently finalizing agreement on split
- Elia to draft proposal on (i) Code of Conduct for connection and access (and related topics), and (ii) revised FGC on A,B,C,D threshold values & requirements of general application
- Elia will be consulted by CREG and DG Energy on other subjects
- Timing: new regime should come into force **by Sept 2022**

Regional Grid Codes

Brussels:

NEW action

- Revision RT Transport Régional inspired by FGC and Flemish TR PVN and integration of new topics specific to Brussels (e.g. certification of renewable energy installations, STIB/SNCB/CDS, etc.)
- Elia to draft proposal
- Timing: BRUGEL board decided the revised RT Transport Régional should be in force **by January 2023**

Flanders:

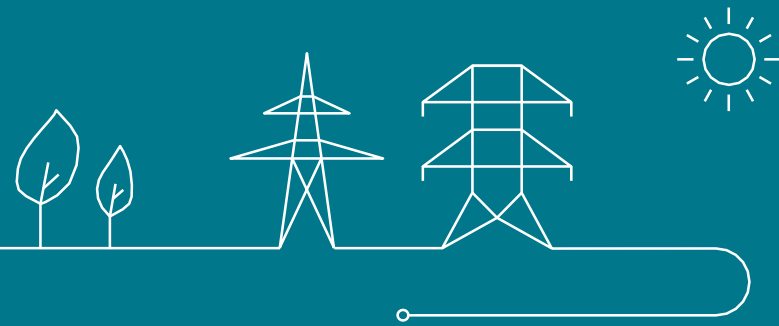
NEW action

- TR PVN amended in June 2020 to align with EU Network Codes; more in-depth revision is now required, also inspired by FGC
- VREG to propose first draft
- Timing: **Q4/2021+2022**
- VREG public consultation foreseen in summer 2022

Wallonia:

- Currently no new information available about the revision process of RT Transport Local – to be expected soon (revision was planned after revision of RT Distribution, which entered into force in May 2021)

Contracts



Revision of the Connection Contract

Ongoing

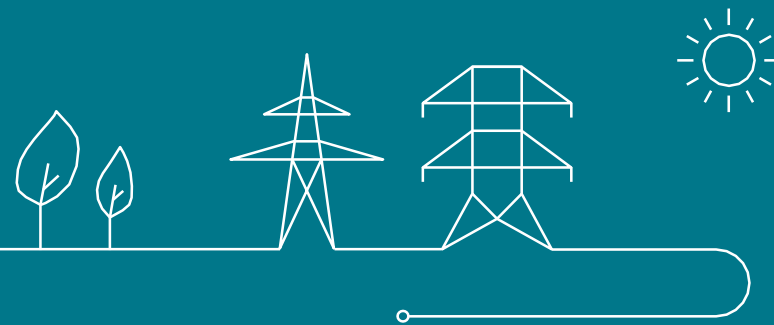
In-depth revision of the Connection Contract, with the following objectives:

- Compliance with the EU Network Codes (connection, SOGL, etc.) and with the FGC;
- Restructuring of the contract to align with other regulated contracts (access, BRP); and
- Enabling of the digitalization of the annexes
- Update linked to Offshore tender (MOG II)

Timing:

- Sharing of first text proposals followed by discussions with members of the WG Belgian Grid mid-February 2022
- Public consultation foreseen in summer 2022
- Target for regulatory approval of final version: **Q4 2022**

Consumer centricity



Consumer centric related topics

Publication of the implementation roadmap of Consumer Centric Market Design:

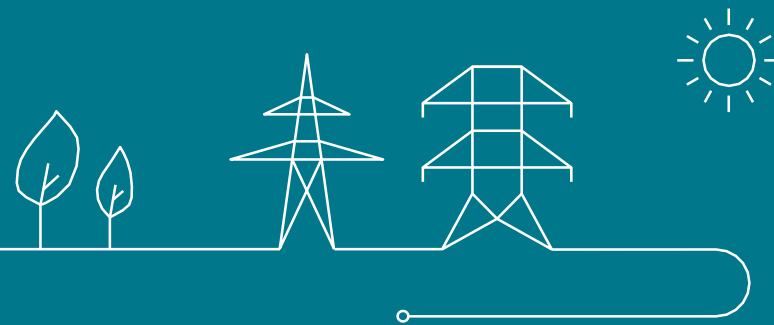
- Both regulatory as technical.

Publication of design and/or implementation note(s) treating specific questions raised during the Roundtables:

- Serving as basis for further detailed discussion with related stakeholders;
- Basis to develop the tools supporting the CCMD;
- Execution of multiple uses cases supporting & testing the solutions.



Grid development

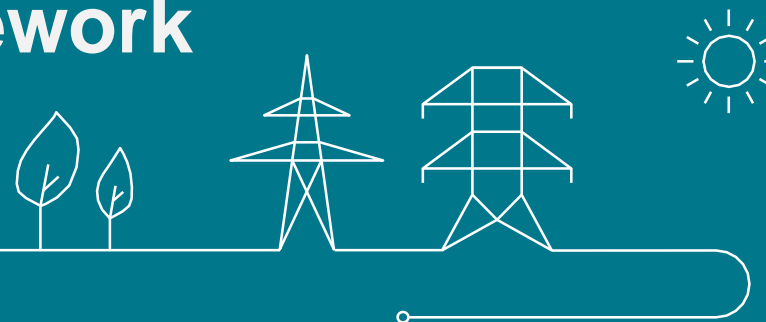


Grid related topics

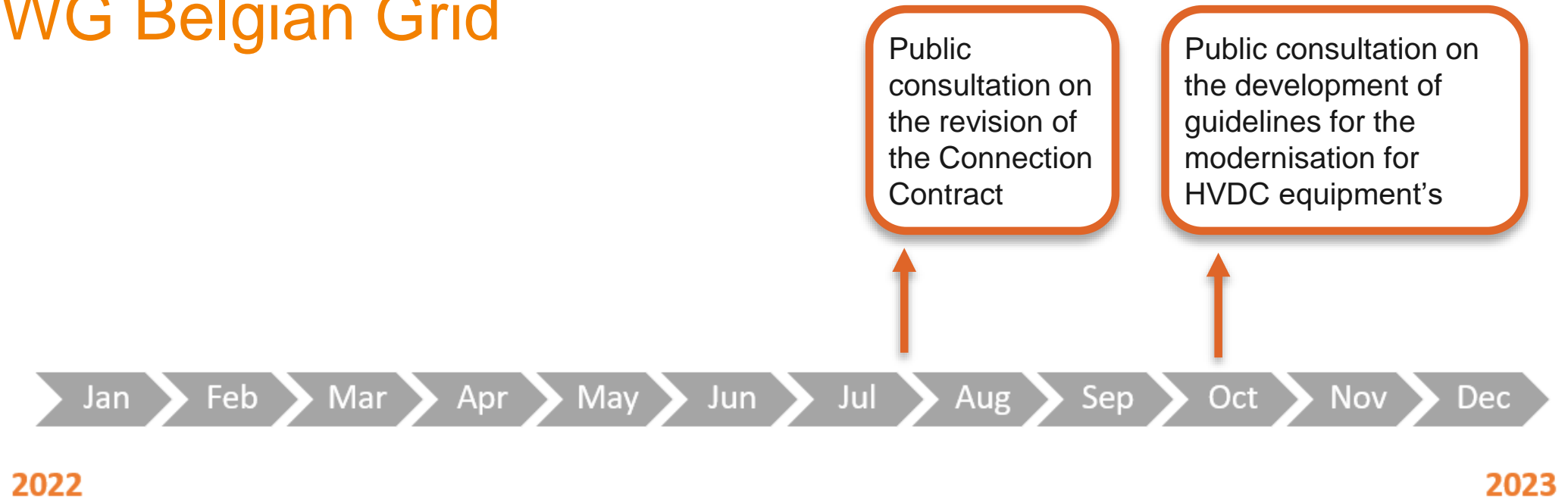
- Grid development topics remain in the scope of the WG Belgian Grid
- Grid evolutions planned for the upcoming years will be presented as well as the development plans that Elia has to submit.



Consultations in framework of WG Belgian Grid



General overview of consultations in framework of WG Belgian Grid



Request for feedback or input

In case if you have any **suggestions** and/or **proposals for topics** that need to be addressed and discussed in the framework of the **Working Group Belgian Grid**, please send us your ideas by Friday 3 December 2021



Questions?

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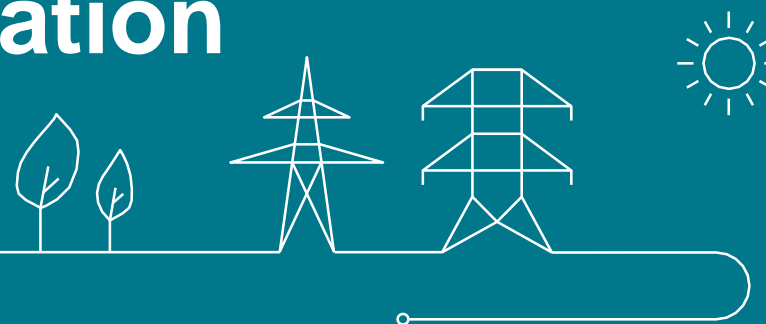


Working Group Belgian Grid Substantial modernisation & derogation - update

Meeting 24th November 2021



Substantial modernisation Regional level

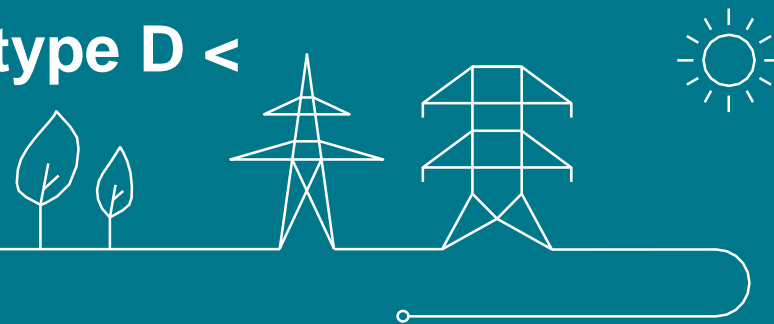


State of play

State of play:

- VREG's approval on the "definition, criteria and process" of the substantial modernisation
- VREG's decision published on 04/10/2021 (BESL-2021-77)
- Regional modernisation guidelines sent to Cwape and Brugel for information
- Regional modernisation guidelines published on Elia website

**Derogation to the principle of substantial
modernisation for existing units type D <
25 MW connected at federal level**



Derogation – Consultation feedback

- The **public consultation** ran from the 13th of August to the 1st of October 2021
 - The consulted documents refer to public consultation on the request for derogation from the application of the principle of substantial modernisation for existing electricity generation units of type D with a maximum installed capacity lower than 25 MW and a voltage at the connection point higher than or equal to 110 kV
 - The consulted document were:
 - Demande de dérogation à l'application du principe de modernisation substantielle
 - Verzoek tot afwijking van de toepassing van het principe van substantiële modernisering
 - The documents are available here: [Demande de dérogation à l'application du principe de modernisation substantielle](#)
-
- During the first consultation, Elia received **2 non-confidential official responses** from:
 - FEBEG
 - FEBELIEC



Derogation – Consultation feedback (1/3)

Topic	Stakeholder	Remark	Actions undertaken by Elia
General remark	Febeg	<p>FEPEG fully supports ELIA on the request for derogation from the application of the principle of substantial modernisation.</p> <p>We consider that ELIA's request for derogation is well constructed and well argued.</p> <p>We thank ELIA for their efforts in this matter.</p>	Elia thanks Febeg for this comment.
General remark	Febeliec	<p>Febeliec would like to thank Elia for this consultation on the request for derogation of the principle of substantial modernization for existing units connected at a voltage level of 110kV or above and with an installed capacity below 25MW.</p> <p>Febeliec completely agrees with the argumentation provided by Elia as the foundation for this derogation request as well as the cost-benefit analysis. Febeliec indeed strongly agrees that the high costs related to the application of the principle of substantial modernization to the units in scope of this request for derogation are not at all warranted by the very limited benefits such application would bring to the system and as such completely supports the derogation request. Febeliec also takes note of the very limited impact such units would have, based on the data provided by Elia on their installed capacity, which indeed strongly supports the case for this derogation request as their impact would be marginal on an aggregated level, yet the individual impact could be more than substantial. Febeliec thus most strongly supports the derogation request by Elia. Febeliec also most strongly supports the intermediary suspension proposed by Elia of the application of substantial modernization to the units in scope until a decision by the regulatory authority.</p>	Elia thanks Febeliec for this comment.



Derogation – Consultation feedback (2/3)

Topic	Stakeholder	Remark	Actions undertaken by Elia
Scope of the derogation	Febeliec	Febeliec wants to stress that the concept of substantial modernization as described in the EU NC RfG is only applicable to units of type C and D. Febeliec strongly asks that the scope in Belgium is not unilaterally expanded to also include type A and B, as this would not bring any significant benefits and comes as shown in the analysis with potentially high costs. Febeliec insists that the scope of significant modernization is limited to type C and D.	<p>Elia takes note of Febeliec's comment. With respect to the application of the principle of substantial modernization to type B units connected to the federal grid, Elia reminds Febeliec and the CREG of the recommendation of the Users' Group aiming at modifying the Federal Grid Code to remove the type B from the scope of application of substantial modernization, as it goes further than the EU NC RfG and leads to a competitive disadvantage with regionally connected comparable assets.</p> <p>The derogation requests concerns the application of substantial modernization to type D units with a power capacity <25MW and connected at >= 110kV, aiming indeed at coherence with the scope of the substantial modernisation at regional level and in line with what is described in the EU NC RfG.</p>
Scope of the derogation	Febeliec	Febeliec also asks that the proposed derogation is granted for those units with a capacity between 25 and 75 MW connected above 110kV, as these units would be considered type C and not D if they were connected at a voltage level below 110kV. As such, Febeliec considers that not including those units in the scope of this derogation leads to a differentiated approach for any units between 25 and 75 MW and this solely based on the voltage level of their connection point and finds this approach arbitrary and not necessarily good from a system perspective as this will lead to less standardization for such units and thus unnecessary and avoidable higher system costs.	<p>Elia takes note of Febeliec's comment. The scope of the current derogation request is limited to generation units of type D with a maximum installed capacity lower than 25 MW and a voltage at the connection point higher than or equal to 110 kV which are considered as existing.</p> <p>However, Elia will take into consideration this point in further renewal of this derogation (unless the legislation has changed so that such a derogation is no longer necessary) or for a new derogation request if market parties deem this necessary and it can be substantiated.</p>



Derogation – Consultation feedback (3/3)

Topic	Stakeholder	Remark	Actions undertaken by Elia
Duration of the derogation	Febeliec	Febeliec regrets that the derogation request covers only the period till July 9 th 2024. Especially for (after derogation) type A but also for type B units, the analysis by Elia shows their extremely marginal system impact. In order to avoid repeating this exercise to frequently, with each time an additional burden in time and resources for all involved parties, Febeliec insists that the period for granting this derogation is substantially extended to at least ten years (but preferably even more, especially in the case of type A units after derogation). While Febeliec understands that this proposal is based on the duration of the existing derogation for new PGMs, Febeliec would rather argue that this indicates that the derogation requests for the new units should be extended rather than the derogation for existing units shortened. In any case, Febeliec, as also indicated during the consultation on the derogation for new PGMs, would also apply the above argumentation for those units and thus an extension of a derogation beyond a five year period and this to avoid undue and avoidable inefficiencies.	Elia takes note of Febeliec's comment. Elia supports stability in the framework applicable to market parties. Elia will take into consideration this point in further renewal of this derogation (unless the legislation has changed so that such a derogation is no longer necessary).

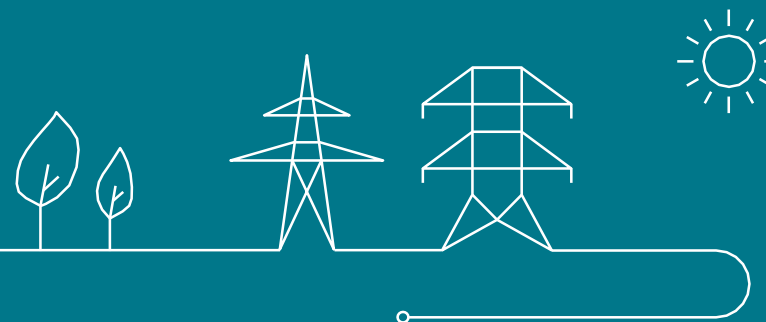


State of play & next steps

After consultation:

- Elia organized an informal discussion with CREG about consultation feed-back
- The derogation was officially submitted to CREG on 28th of October (unchanged documents) together with the consultation report and consultation reactions
- Demand for temporary derogation until decision of CREG

Thank you



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Toegangscontract

Stand van zaken



Het Toegangscontract

- **Publieke consultatie:** 9 juli – 3 september
- **Feedback** werd toegelicht op de **WG BG:** 17 september
- **Regulators ingelicht** publieke consultatie: 21 september
- **Gefinaliseerd en aangepast** op basis van feedback (waar mogelijk)
 - ✓ BASF
 - ✓ FEBEG
 - ✓ BOP
 - ✓ (FEBELIEC)
- Informele **feedback** van **regulators** verwacht tegen **begin december**
- **Finalisatie** en **formele indiening:** eind december/begin januari
- **Goedkeuring:** 2 maanden na indiening
- **Communicatie** naar **toegangshouders**

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Voorstel van data

Werkgroep Belgian Grid – eerste helft 2022

Eerste keuze	Tweede keuze	Derde keuze
Vrijdag 28 januari NM	Donderdag 3 februari NM	Dinsdag 1 februari NM
Dinsdag 29 maart NM	Donderdag 31 maart NM	Vrijdag 1 april NM
Donderdag 2 juni NM	Donderdag 10 juni NM	Dinsdag 7 juni NM

We'll send a Doodle to determine the dates

