

ToE and ARP contract

WG Belgian Grid – 23.02.2018

Public consultation w.r.t. Transfer of Energy

Overview consultation period

- **Consultation period** from 13th of November until 8th of December
- Received contributions from the following stakeholders
 - FEBEG
 - Teamwise
 - Restore
 - BASF
 - Febeliec
 - DSOs
- Elia received 1 confidential response (Next Kraftwerke Belgium)
- **Elia's reaction** on the public consultation was published on **Tuesday 15th of February**

- ✓ Consultation period: 13 Nov. '17 – 8 Dec. '17
- ✓ Contributions:
 - FEBEG, Teamwise, Restore, BASF,
 - Febeliec, DSO's
- ✓ 1 confidential reaction: Next Kraftwerke

Contributions to the public consultation: ToE-rules

1. Net-offtake character of the delivery point

- Multiple market actors (FEBEG, Febeliec, Restore, BASF, Teamwise) are demanding why the transfer of energy rules are limited for delivery points with a net-offtake character and why net-injection is excluded from the field of application.

- **Vision Elia:**

- Art. 19*bis* §1 of the Electricity Act is only applicable for demand side flexibility (“vraagflexibiliteit”)

2. Phased approach

- Febeliec notices that the feasibility studies are planned too late and Restore demands to start with the intraday market before the market of Strategic Reserves.

- **Vision Elia:**

- Elia has to **prioritize** so that the market parties and Elia can follow and the matter remains manageable.
- Products (mFRR, aFRR en SDR) exclude a simultaneous delivery at the same delivery point (= principle of the so-called mutual exclusivity).

3. Asymmetric Imbalance Adjustment (AIA)

- The DSOs note that the rules drawn up in case of overdelivery (pro-rata correction) are not compatible with the fact that the intervention of an FSP may not be detrimental to other parties (need to correct the balancing perimeter of the ARPsource)

- **Vision Elia:**

- Elia refers to the Bidladder design note finalized in Sep 2016 where the pro-rata correction was explained and was already publicly consulted. The Asymmetric Imbalance Adjustment was not in scope of the consultation.

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4. Metering Requirements

- Febeliec and BASF notice that the modalities for the installation and management of meters connected to the CDS network do not apply to closed distribution grids (CDS) and that the general technical requirements for metering solutions to which the transfer of energy rules refer are not in line with what has been agreed with BASF.

- **Vision Elia:**

- Elia allows the CDSO to exchange quarter-hourly metering data with Elia from the CDSO database. Elia will make the necessary clarification in the transfer of energy rules.

5. Relation between CDSO and Elia

- Febeliec and BASF note that
 - ✓ the contractual relations with the CDSO are not described in transfer of energy rules
 - ✓ the FSP - Grid User Declaration includes a statement that the quarterly data may be shared with the FSP and Elia. No reference is made in the transfer of energy rules to a similar agreement for the CDS grid operator;
 - ✓ there is a lack of clarity about the definition of 'all relevant contractual information' required for the handling of the energy transfer.

- **Vision Elia:**

- contractual relations or detailed aspects of the operational exchange of quarter-hour metering data **are not part** of the transfer of energy rules, but will be dealt within the CDSO Collaboration agreement between the CDSO and Elia.

Contributions to the public consultation: ARP contract

- ✓ Consultation period: 13 Nov. '17 – 8 Dec. '17
- ✓ Contributions:
 - FEBEG, Teamwise, Restore, BASF, Febeliec, DSO's
- ✓ 1 confidential reaction: Next Kraftwerke

1. The ARP his individual balancing obligation

- FEBEG raises the question whether confidentiality should not be reviewed for those customers with online metering
- FEBEG demands clarity regarding the following paragraph 10.1 : “*ARP is verplicht om in real time in evenwicht te zijn of zijn capaciteit te vrijwaren, uitgezonderd...*”
- FEBEG requests for coherence between the articles of the ARP contract and the Federal Grid Code. Article 10.2 of the ARP contract allows the ARP to perform reactive balancing, which is in contrast with Art. 157 §1 of the Federal Grid Code.

Vision Elia:

- Elia is of the opinion that the ARPsource can only be informed with aggregated volumes regardless of the type of metering applied to the customers (confidentiality is imposed by the Electricity Act)
- Elia accepts FEBEGs proposal to apply a modified wording for the newly inserted paragraph 10.1: “*ARP zal op ieder moment alle redelijke middelen voorzien en uitwerken om op kwartierbasis in evenwicht te blijven, uitgezonderd...*”
- Elia proposes to ensure the coherence between the ARP contract and the Federal Grid Code in the future.

2. Contribution of the ARP to the overall objective of maintaining the balance of the control area

- Febeliec and BASF ask for clarity about the ability of the ARPfsp to deviate in real-time from its balance to participate to the overall objective of maintaining the balance of the control area (e.g. if no flexibility is offered and / or activated).

Vision Elia:

- Elia emphasizes that the ARPfsp can not participate in the overall objective of maintaining the balance of the control area for the part **relating to its activity** as ARPfsp.

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3. The notification of the ARPsource

- Febeliec and BASF note that Art. 11.1.2 of the ARP contract only describes the notification if there is no correction for the imbalance in the perimeter of the ARPsource and that Art. 11.1.3 of the ARP contract does not mention the data exchange between ARPsource and Elia.

Vision Elia:

- The notifications described in art. 11.1.2 of the ARP contract describes the notification in the following 2 cases

1. Notification in case of an activation by Elia of **reserved** tertiary reserves;
2. Notification in case of an activation by Elia of **non-reserved** tertiary reserves

In both cases, Elia will inform the ARP at best effort over the maximum volume activated and the actual delivered volume to the extent Elia has this.

Concluding remarks

- After review of the NL and FR version of the ARP contract, a proposed amendment in the French version was not in line with the Dutch proposal. Elia therefore proposes to
 - Replace “Opérateur de réglage tertiary de l'énergie” in the French version with “Flexibility Service Provider” as proposed in the Dutch proposal.
 - Systematically replace “Gestionnaire du Marché” by “CCP” in the French version as proposed in the Dutch proposal.

fyi: during the consultation, Elia received no response from the potentially impacted market parties on above items.

- Elia will wait on CREG’s final decision on **Art. 19bis. § 3-5** (standard price, bank guarantee, ...) for further amendments to ToE-rules. Elia will launch 2nd public consultation (only 2 weeks) for revised ToE-rules
- Elia will submit amended ToE-rules for approval by CREG
- Meanwhile, Elia will start pre-consultation on **Supplier convention** and **GFA Bidladder**

Updated planning: Transfer of Energy rules

