Task Force MOG 2

Celia Fila Gr

24th of March 2023



Balancing [60 min] [60 min]

Agenda

Mitigation measures

Dynamic and harmonic

Data & models provision and introduction on conformity process



Balancing – mitigation measures

Kristof De Vos and Aline Mathy



Timeline balancing aspects





Discussion feedback on mitigation measures

 discussion on the justification and implementation of the recommended mitigation measures (based on questions received from stakeholders) presented in the TF MOG 2 of 10.01.2023

Input received from stakeholders



QUESTIONS WERE RECEIVED ON :

A. General design principles of mitigation measures

- level playing field between BRP's, without differentiation in function of technology
- avoid any retroactive application of the mitigating measure
- distinction between balancing (risks) and grid security (risks)

B. Assumptions on system simulations

- in particular to the market reaction related to CCMD scenarios
- re-evaluation of the need to maintain the alpha component.

C. Impact of the recommended mitigation measures

- ability of equipment suppliers will be able to install wind turbines with high wind speed technologies.
- preventive curtailment : remuneration and the implementation of the maximum number of activations on wind parks
- ramping limits level playing field in procedures on cut-in coordination, and possibility to re-enforce requirements under worst case market conditions

Clarifications will be provided throughout the presentation



Summary



What ?

When focusing on extreme offshore weather events, two relevant cases are identified

- Ramps (below wind speeds of 20 m/sec) Sudden variation of wind power generation as a result of wind speed variation related to the exponential profile of the power curve at normal wind speeds.
- 2. Storms (above wind speeds of 20 m/sec) Sudden variation of wind power generation due to cut-out / cut-in behavior of wind turbines in case of elevated wind speed related to high wind speed management systems of turbines.



Power curves for assumed technology scenarios and storm shutdown scenarios in MOGII integration study



Mitigation measure design principles

- **1.** Elia is responsible for system security and needs to avoid <u>system violations</u> at any time.
- 2. Mitigation measures are designed to
 - A. imply the least cost possible for society
 - B. take into consideration the complexity and timing to solve the issue
 - C. mitigate cost when market shows good performance and activation of measures can be avoided.

Measures are designed under assumptions of future market performance, it does not exclude that additional measures / reserves are needed when observing an evolution towards market performance beneath the scenarios presented.

3. Aim for transparency and visibility on the impact for the wind park / BRP

The mitigation measures are identified for upcoming tenders corresponding to the announced 3.5 GW offshore capacity. Existing parks are not impacted except that they can choose to voluntary adopt the ramp rate limitation regime (instead of the current cut-in coordination)

The impact of additional offshore wind power above 5.8 GW needs to be assessed separately. Additional, more stringent, mitigation measures might be required with increasing capacity. Existing information does not allow detailed assessment, and certainly not to impact tenders for the foreseen 3.5 GW.

While Elia agrees with stakeholders to avoid retro-active application of new measures, it cannot be fully excluded as this is not solely in the hand of Elia.

System violations



Alert: system is still within Operational Security Limits, but a Contingency has been detected, for which in case of occurrence, available Remedial Actions are not sufficient to keep Normal State **Emergency**: One or more operational security limits are violated

 \Rightarrow To be avoided at all time

=> To be solved as soon as possible

The need for mitigation measures for exceptional balancing conditions (assuming 4.4 GW offshore wind power installed) as per Elia study of 2020





Market performance assumptions

elia Elia Group

- Based on historical observations for 2.3 GW offshore park (2020-22)
 - Coverage : represents the part of the increase or reduction in wind power production covered by the BRPs
 - Full recovery time : represents the time needed for BRPs to fully cover the system imbalance in a stable way.
 - Gradient : represents the rate with which the BRPs react to cover power variations
- Best case events generally result from predicted events while worst case events rather result from unpredicted events
- Additional wind power is assumed to be managed with same performance as today when having access to additional flexibility (through CCMD market reform)

Aligned with REA+ scenario presented in WG BAL workshop on reserve dimensioning 15.02.2023

MOG 2 2022 Observations for 2.3 GW	Down Ramping event (shortage)			Up Ramping event (excess)			Storm cut-out		
	Coverage*	Full recovery time*	Gradient**	Coverage	Full recovery time	Gradient	Coverage	Full recovery time	Gradient
Best case	60%	45 min	2.00/	90%	10 min	3,5%	85%	15 min	3,5%
Worst case	30%	130 min	3,0%	50%	100 min		60%	120 min	
*Average of minimum and maximum over events analyzed in 2020, 21 and 2022 **Average of average over events analyzed in 2020, 21 and 2022 •*Average of average over events analyzed in 2020, 21 and 2022									

Increasing wind installed to 5.8 GW \Leftrightarrow Additional available flexibility

MOG 2 2022 Assumptions for 5,8 GW	Down Ramping event (shortage)			Up Ramping event (excess)			Storm cut-out		
	Coverage	Full recovery time	Gradient	Coverage	Full recovery time	Gradient	Coverage	Full recovery time	Gradient
Best case	60%	45 min	3,0%	80%	15 min*	2.004	85%	15 min	2.00/
Worst case	30%	120 min*		50%	120 min*	3,0%	45%	120 min	

*Values rounded In red: reduced performance compared to current observations

MOG 2 balancing responsibility



- Per article 5 of Electricity Regulation 2019/943 (internal market for electricity recast), all market participants shall be responsible for the imbalances they cause in the system. It clarifies that this entails full financial responsibility
 - Via the imbalance tariff, the wind farm is incentivized to follow through on their sold volumes in the market. It can control this by improving forecasting accuracy or adjusting their position closer to real-time (intra-day, self-correction...).
 - Without balancing responsibility, higher forecast errors will result in increased risks for real-time flexibility shortages and network congestions, in worst case leading to demand shedding or renewable energy curtailment.
 - The lack of balancing responsibility renders the market ineffective to ensure its function of distributing the responsibility to dispatch the entire system and the TSO will need to take over this function via additional reserve capacity and exceptional balancing measures (of which costs will be attributed to the grid user)
- This presentation and design principles need to be seen in the light to create adequate (representing value of balancing energy) and consistent (in line with intra-day and day-ahead) price incentives in the balancing time frame allowing to :
 - Mitigate the impact of renewable generation on reserve dimensioning (= balancing procurement costs) and exceptional balancing measures (= activations costs) accounted to the grid user

General conclusions of system simulations



	Amount of violations increases under worst and best case assumptions compared to 4.4 GW despite better market performance
	assumed :
No violations are observed anymore compared to 4.4 GW under best case assumptions (thanks to better market performance assumed)	- Violations become also present in the best case
performance assumed)	- Substantial increase of the violations in the worst case
- Frequency of violations increases under worst case	This <u>creates the need for mitigation measures</u> dealing with downward ramping
assumptions compared to 4.4 GW even during periods with high flexibility available in the system	
	- Still no violations are observed under best case assumptions
The results under worst case assumptions <u>confirm the</u> need for the proposed mitigation measures in the MOG 2	- Amount of violations under worst case assumptions remains similar to 4.4 GW (due to increasing market performanc
2020 study	The results under worst case assumptions <u>confirm the nee</u> for the proposed mitigation measures in the MOG 2 2020

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Summary of Mitigation Measures

Existing mechanisms

Recommended measures with explicit impact on wind power producers and BRPs





Recommended mitigation measures



High wind speed technology

• Elia proposes a technical minimum requirement on new wind turbines to be able to maintain generation until 31 m/sec.

• The recommendation was proposed by Elia in 2020 as a desirable mitigation measure to manage storm cut-outs



Alternative implementation option (on request of BOP) :

- Elia seeks confirmation first of market players that this option will be effectively used
- The alternative will be based on the ability of wind parks to demonstrate that the solution chosen is at least equivalent at the connection point based on:
 - Extreme events (wind speed profiles) that need to be simulated to provide equivalent Power Output
 - Resulting ramp rates difference (power output) shall not be worse than an equivalent behavior of the requested profile by Elia

Implementation as foreseen :

- Respect the following requirements at turbine level, for each single turbine:
 - 1) sudden cut-off cannot occur before 31m/s (for an averaging time of 10 minutes)
 - 2) gradual power decrease starts at average wind speeds at least 5m/s below the sudden cut-out average wind speed
 - 3) gradual decrease of power must be guaranteed until a Nominal Power of at least 0.5 before sudden cut-out occurs.

Elia will specify the HWS technology requirement on turbine level in the Tender requirements

Storm Cutout

It will also specify it will allow equivalent characteristics as connection point level.

Elia will provide the expected behavior at connection point level towards the commissioning of the wind parks.

Impact assessment of HWS technology requirements

- Elia's system simulations show that the measure is helpful in reducing emergency situations, particularly during :
 - Worst case market behavior (e.g. unforecasted storms)
 - Low availability of non-contracted mFRR balancing energy
 - During the beginning of the storm-cut out

But still needs to be complemented with additional mitigation measures as risk of emergency situations persist

- The market is implementing HWS technologies as this is becoming a **customary feature** for most turbine manufacturers.
- No objections received by wind power sector (including technology providers participating in the TF MOG 2) on the future technical capability (but no information is currently available on new storm control capabilities)
- The use of HWS technologies is already incentivized through Grid Connection compliance requirements

Elia considers that this technical requirement (already being or becoming a standard technology) has limited impact for the business case of wind power in comparison to the advantages for the system

Storm Cutout

Ramp rate limitations for wind power generation

 Ramp rate limitation
 Elia proposes to limit the maximum upward ramp rate to 15 MW per minute for new offshore wind parks when system imbalance exceeds 500 MW
 The recommendation was put forward by Elia in 2020 as a desirable mitigation measure to manage storm cut-in and expected / unexpected ramps, as well as simplify the existing cut-in coordination procedures



Illustration of a wind power (fleet, park or turbine) cut-in after full cut-out

Storm Cut-

in

Ramp up

Relation of the ramp rate limitation to the existing cut-in coordination

TSO

SA

- Analysis from DTU clearly demonstrates the need to coordinate the cut-in phase after a storm event
- Requirement is already implemented in the T&C SA and T&C OPA and is in line with Article 131 of the Code of Conduct
- Implementation of the automatic cut-in coordination or ramping rate limitation at the latest when connecting the new parks

А

В

Request from the market

Currently applied on a case by case basis. Market parties requested clear parameters and guarantees, particularly:

- Clear and transparent framework around cut-in coordination
- No undue delay + maximum duration of the cut-in
- Non-discriminatory process between wind parks
- Existing parks shouldn't be impacted by new wind parks rules
- Take into account the available technical functionalities

<u>BUT</u>, <u>manually</u>, this cannot be guaranteed anymore in the future configuration due to increased system complexity

 \Rightarrow The coordination must be automatized (via A or B)

 Cut-in coordination for existing offshore wind parks: Automatic 'static' cut-in coordination independent of system conditions

 When a storm event has ended, the SA Offshore Power Park Module request approval to cut-in by sending an IDPCR

As is : Elia manually approves the IDPCR and coordinates the cut-in phase for each wind park individually.

To be : Elia automatically approves IDPCR but imposes a linear ramping profile (or equivalent) in a pre-defined period of around 1 hour after request to come back via the SA

To be discussed with existing parks

For existing offshore wind parks **able to react on real-time signals**, the **Ramping Rate limitation** proposed to new parks **can be applied** instead of the automatic cut-in coordination

Impact assessment of the ramp rate limitation

- Elia's system simulations show that proposed ramp rate limitations can eliminate almost all emergency situations :
 - A sensitivity analysis confirms the trigger at 500 MW and ramp rate at 15 MW/min
 - But some emergency conditions are expected to remain :
 - Worst case market behavior (e.g. non-forecasted ramps)
 - Low availability of non-contracted mFRR balancing energy, even under best case market behaviour
- By applying the wind production measurement from an existing wind park on top of the historical system imbalance data over 1 year, we showed that the measure results in very limited / negligible generation reductions with a full load impact of 0,2 hours per year
 - Note that the activation frequency of mechanism may be impacted with an offshore bidding zone (cf. next slide)
 - Note that the financial impact will depend on the selected subsidy scheme (further iteration will be needed after selection of the subsidy mechanism)
- The applied generation limits depend directly on the performance of the market. Activation is avoided when market parties react pro-actively on the system imbalance

Simulations demonstrate that fast upward ramps are a threat to the system, particularly in cases with worst case market performance. While already managed today via cut-in coordination after storm, this measure needs to be generalized towards upwards ramps in general (also outside storm conditions). The impact of the measure is mitigated if market reaction keeps the system imbalance under control.

Storm Cut-

in

Ramp up

Impact of an offshore bidding zone on the activation frequency of the ramp rate limitations

First analysis following feedback received during the workshop 17/03

- In line with the proposed measure, the ramp rate limitation would be triggered under the netted imbalance over the two LFC Areas in the LFC block
 - It allows to take into account the onshore imbalance situation and thus to take into account imbalance netting between the two LFC Areas before activating the ramp rate limitations.
 - But it can be expected that the market reaction of onshore BRPs is lower in an OBZ as they will react on onshore LFC area system imbalances and system imbalances prices rather than on the offshore LFC area imbalances and prices.
 - The expected frequency of activation of the ramp rate limitation is thus expected to increase in an OBZ.

Preventive curtailment

Storm Cutout down



Impact assessment of the preventive curtailment measure

- Elia's system simulations show that the measure is needed to deal with storm cut-outs and downward ramp events
 - Worst case market behavior (e.g. unforecasted storms) and even best case market behaviour (e.g. unforecasted ramps)
 - · Low to even moderate availability of non-contracted mFRR balancing energy
 - Even after assuming implementation of HWS technologies
- This measure is expected to result in a limited generation reduction for wind power, i.e. in a conservative estimation
 - The cap is low in comparison with the average annual production hours
 - 187,5 hours per 5 years for storms (under assumption of full curtailment for 7.5 hours, for 5 storms a year)
 - The cap includes hours where the wind park would likely not have been able to produce anyway due to the storm
 - 265 hours per 5 years for ramps (under assumption of full curtailment for 1 hours, for 53 ramps a year)
 - Curtailment will limit the risk for the BRPs to be unbalanced at a moment where the imbalance price is expected to be high
- Note that the potential effect of lost energy revenues will depend on the selected subsidy scheme (further iteration needed)
 - A certain price risk cannot be avoided as it intends to make the BRP cover shortages in the intra-day market
 - The initial proposal was to specify a cap ahead of the tender under which activations are not remunerated
- Implementation will be integrated in the exceptional balancing measures, encouraging / obliging BRPs to manage their portfolio (cf. storm procedure). Correct behavior of BRPs will result in avoiding activation of the measure.

Elia considers storm cut-outs and downward ramps as a serious threat to the system. While already managed today via HWS (in case of storm), analyses show that HWS is not sufficient and that preventive curtailment is needed in case of storms and also needs to be extended towards downward ramps. The financial impact can only be assessed after the subsidy scheme has been selected

General messages on mitigation measures



In depth simulations / analysis by DTU / Elia reveal the need for mitigation measures

Proposed mitigation measures are designed to :

- fully cover the operational risk following storm and ramps
- find a trade-off between :
- limit impact on cost for grid users by limiting impact on reserve needs
- limit impact on wind parks, at least when showing good market reaction

Poor market performance or bad predictability of storms and ramps may trigger need for additional measures Even with high wind speed technologies, simulations conducted by DTU show that downward variations up to 3.5 GW in 60 minutes may happen every 10 years (and up to 2,5 GW every year) and upward variations up to 5.5 GW every 10 years (and up to 3,5 GW every year).

- Observations and simulations demonstrate that BRP reactions for storms and ramps events is not always sufficient to mitigate their impact.
 - Exceeding operational security limits arises for all up- and downward ramps (including related to storms) under worst case market conditions
 - · Exceeding operational security limits arises with downward ramps even under best case market conditions

The high wind speed requirement for new parks is confirmed as 'no regret solution' as it reduces escalation events while expected to become standard technology. On request of market parties, Elia will develop the possibility to translate the requirement to the connection point level

Ramp rate limitations for new wind parks during high system imbalance conditions in the Elia LFC block for new parks are crucial to manage extreme upward ramping events (including storm cut-ins). Elia will allow existing parks to voluntary switch from cut-in coordination procedures to ramp rate limitations.

Preventive curtailment during low market reactions will be further elaborated to deal, besides forecasted storm cut-outs, with forecasts downward ramping events, after follow-up on mitigation measures taken by the market (in line with current storm procedures).

- Both measures allow to (almost) mitigate all escalation events the impact for wind parks on lost revenues is limited
- Both measures avoid activation and costs incurred when market achieves to balance the variations
- Elia will investigate the predictability of ramping events. It is not excluded that forecast issues and limited market reaction requires complementary solutions (e.g. reserve capacity increase, or exceptional balancing measures)

The capability to deliver the mitigation measures will be specified in the Tender requirements, while the implementation of the measures itself will be developed in the regulatory framework towards commissioning of the parks (after consultation and regulatory approval).



Dynamic & Harmonic



Several activities and studies are required for derisking the Belgium coastal projects from pre-design till real time operation.



Penninger



Context Olivier Bronckart



The Belgian and European system will face massive changes in the coming years leading to new power system stability phenomena and a reduced system strength



The MOG 2 project is in a range of system strength (WSCR) that will require data & model and <u>strong</u> <u>coordination for the conformity of the design of each installation</u>

Part 1 - data & models

Aymen Chaouachi

Models needs

Methodology to define the model needs

Simulation models : model requirements provisions

副 **Model requirements** Model requirement per simulation type Steady-state - SPGM - SPM/PPM - Demand RMS - SPGM - SPM/PPM - Demand EMT - SPGM - SPM/PPM - Demand Harmonics - SPM/PPM - Demand **Black-box provisions**

Content

- Generic and/or detailed simulation models reflected at point of connection
- SPGM models include electrical components (AVR, PSS, governor), and other physical limits (fuel valve, pitch and internal turbine limits) when influencing units response
- SPM/PPM type B equivalent while type C and D both individual / equivalent models requested
- Model aggregation per technology type
- Grey-boxed models including descriptions and input/output minimum requirements.
- Load models as site-specific considering on the nature of the load. It includes Scc current / limits and X/R ratio.

Simulation models : data questionnaire to capture data needs

AS IS

3	Gene	rator information	
	Manufa Type : Year ma	cturer : Siewiew 46, 5 6,ew5 - 200 A - 49 anufactured : 2003	
	Snom	Rated apparent power (+ related ambient temperature) MVA	50,00
	Pnom	Rated active power (+ related ambient temperature) MW	42,5
	Unom	Rated terminal voltage kV	10,50
	U.	Tolerance on the terminal voltage above the rated voltag %	e 10%
	U.	Tolerance on the terminal voltage under the rated voltag %	e In el
	Inom	Rated stator current at standard cooling condition kA	2749
	Cos	Rated power factor	380
	nom	Rated speed	1560 rpr
	PD ² alt x m2	Moment of inertia (generator + excitator)	172 395 K

X Prone to errors/incorrect data

~_____

			45
8,1	Transformer (generating unit ar	nd generatin	g system)
Symbol	Data Description	Units	Value
	Transformer identification number	Text	
	If this is a <i>generating unit</i> transformer, the list of <i>generating units</i> to which this information applies.	Text	
	Manufacturer and manufacturer's type designation or product name.	Text	
	Possible ground connection impedance (at primary and/or secondary winding)?	Text	
	Connection of an auxiliary tertiary winding in delta?	Text	
	Shell or Core type transformer?	Text	
	Free or forced fluxes magnetic path?	Text	
		Text	
4.4	Desire Data Shaat		
1.1	Design Data Sheet		
Symbol	Data Description	Units	Value
Snom	Apparent nominal power	MVA	
Unom1	Machine-side nominal Voltage	KV	
Unom2	Network-side nominal voltage	KV	
Deu	Copper losses	000%	i i
Pfo		KVV	
Im	Magnesiting current	Δ	
CTW/	Number of windings	^	ii
	Effective data Minimized risk	integrat of inco	ion rrect data
	Potential for au	utomatio	collection

TO-BE

Model validation

Models validation is key for the accuracy and quality assurance

Different steps were followed to define the model validation process

Overview of model validation process

Part 2 - conformity process

Olivier Bronckart

Conformity assessments and lifecycle of Power Generation Module (PGM)

Current practice for simulation based conformity assessment in Elia

Such approach is acceptable for connection of synchronous machine or power park modules connected to strong grid, but <u>not acceptable</u> with the challenges/trends leanding to new stability phenomena we are facing

An improved conformity process is needed to operate the system in reliable and stable way

Possible future path for conformity process to operate the system in reliable and stable way

Short-term

Short-term solutions are required for MOG 2 with some trade-offs due to limited time

No directly useful solution is available from **other countries**

Most acceptable compromise option for **division of responsibilities and exchange** of data and models between all parties shall be developed

Not all connections within Belgium will require the new more detailed conformity assessment

Long-term

Longer-term solutions in collaboration with other TSOs via European network codes

The effort/time constraint to develop the conformity process should be reasonably proportionate to the size of the project

Voltage control: adjustment of voltage and MVar capabilities (owner of step-up transformer shift from OWFs (MOG 1) to Elia for MOG 2) – presented

The output of pre-design studies* might require additional adaptations

Thank you

Appendix

Dynamic & Harmonic

Details on challenges

(#** Modelling Challenges for modelling aspect to perform conformity assessment (**1**2) Legal and regulatory Future power system Likely future practice **AS IS** Challenges PGMs under consideration Determining the boundaries of wide-area EMT model 1 Extension of the system modelled ÷ Wide-area EMT model development skills gaps Wider power system including cross-border 2 plants with a likely impact

RMS

Modelling tools for connection studies

Interaction with other nearby PGMs

온감

Not considered from a dynamic response perspective

Considered by <u>including dymanic models</u> of all such PGMs

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EMT

The criteria for queuing or batching concurrent PGMs for dynamic modelling shall be determined

ELIA can identify a problem but often not the cause

Skills gap in EMT studies

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3

3

Challenges for legal and regulatory aspects to perform conformity assessment

Modelling

Legal and regulatory

Future power system

Challenges for future power system aspect to perform conformity assessment

Modelling

Legal and regulatory

Future power system

Balancing

Elia's feedback on questions received

Market Party question	Elia answer
Elia should aim at a level playing field between BRP's, without differentiation in function of technology	Elia agrees with the principle to maintain a level playing field where possible and tries to this principle as much as possible via its balancing market design. Analysis on offshore wind power developments reveal very particular problems with offshore wind which are difficult to cover via reserves or current balancing mechanisms available (limited frequency of events with high impact, challenging predictability of events,). Note that impact assessment shows that impact of the proposed measures presents a trade-off between impact on the BRPs and the cost for the grid user. Legal framework gives us the means to do this. Ramping rate limitation: ramping rate restrictions are applied in compliance with RfG regulation Article 15(6)(e): <i>"the relevant system operator shall specify, in coordination with the relevant TSO, minimum and maximum limits on rates of change of active power output (ramping limits) in both an up and down direction of change of active power output for a power-generating module, taking into consideration the specific characteristics of prime mover technology"</i>
Elia should avoid any retroactive application of the mitigating measure	Discussed on slide 8
There should be a clear distinction between balancing (risks) and grid security (risks)	The foreseen mitigation measures in this presentation aim to cover operational security (grid) risks related to balancing events related to storms and ramps which are not adequately managed by the market and available balancing energy (contracted and non-contracted).
Elia claims that mitigating measures are designed to imply the least costs possible for society. Is there any CBA demonstrating that the savings for Elia outweigh the impacts, increased risks and/or increased investment costs for BRPs?	Slide 16, 19, 22 present an impact assessment of the proposed mitigation measures. A detailed, quantitative CBA is not considered needed as the impact assessment shows that the impact remains rather limited (particularly under high market performance) in comparison of the alternatives to increase reserve needs.

Market Party question	Elia answer
Could Elia please explain how CCMD – which is just a theoretical concept at this stage – is taken into account?	Best case market performance assumptions in slide 10 are in line with REA+ scenario (assuming the launch CCMD market reform on short-term) while worst case market performance can be considered in line with REA- scenario (assuming delays on CCMD market reform). Scenarios are presented in WG BAL workshop on reserve dimensioning of the 15/02/2023. REA+ is assumed to result in better performance as observed today (even with additional renewable capacity), while REA- is assumed to result in similar criteria as today (despite additional renewable capacity).
FEBEG regrets there's no re-evaluation of the need to maintain the alpha component	An analysis on the need for an alpha parameter has been conducted in the framework of the re-calibration of the alpha. No new evaluation of the alpha-parameter are currently foreseen at this stage (being difficult at this point in view of the energy crisis and periods in which the alpha was suspended).
Risk of pancaking costs: it should be checked if not only a very limited number of equipment suppliers will be able to install wind turbines with high wind speed technologies.	Discussed in slide 16
Preventive curtailment is an intervention of Elia in balancing by BRPs and should be remunerated. Full remuneration shall avoid risk premiums being integrated in business plans. Elia is shifting risks to the market: is there a CBA confirming that is the cheapest solution for society? The maximum amount of activations is equal to all market actors? What about existing and new?	Discussed on slide 22
Is a level playing field ensured in the procedures for the cut-in coordination?	Discussed on slide 18
Elia mentions more stringent requirements will be needed when facing worst case market performance. What is the trigger to switch to more severe requirements? Is there a transparent decision process? Will market parties be informed about the shift to more severe requirements?	Discussed in slide 8