

Feedback in response to the public consultation on the study about the designation of multiple BRPs on an Access Point

In this reaction, Belgian Offshore Platform responds to the public consultation regarding the study about the designation of multiple BRPs on an Access Point, as launched the 15th of July 2021.

BOP remains at Elia's disposal for further questions and clarifications when deemed necessary.

General remarks

BOP welcomes the introduction of multiple BRPs behind a single Access Point. As indicated in the study in §2.1, splitting assets (i.e. parts of the offshore wind park) behind an Access Point by assigning it to more than one BRP could reduce the financial risks for BRPs and further open the limited BRP market in Belgium. The current Annex 9 of the access contract is too restrictive, as a single lead BRP is to be assigned.

Nevertheless, we have the impression that the current study, in an attempt to be as generic and technology independent as possible, remains quite theoretical and therefore we welcome a dedicated session with Elia on a possible practical implementation for offshore windfarms.

We specifically envisage a split of an offshore wind park (OWP) into two or more groups of physical assets to be assigned to different BRPs, i.e. groups of strings (each string containing several wind turbines), where each group of strings can be individually controlled by a power controller.

Some specific attention might be given to a situation with looped strings. For example, string A (connected to 5 wind turbines) and string B (connected to 6 wind turbines) are looped. In case of a cable error on string A between turbine 3 and 4 (counting from the OSS), the energy of turbines 4 and 5 could be evacuated via string B. When both strings are allocated to a different BRP, the energy might flow to the perimeter of a different BRP. A pragmatic solution could be to allocate looped strings to the same BRP.

3.5 Scheduling and Outage Planning

We would like Elia to clarify the definitions in the context of an offshore wind park (OWP) and preferably indicate it in a schematic manner:

- What is the definition of a Power Park Module? Is this always the entire OWP or can it be considered as the group of strings which can be individually controlled? In our understanding this definition is regulated by the EU RfG: 'power park module' or 'PPM' means a unit or ensemble of units generating electricity, which is either non-synchronously connected to the network or connected through power electronics, and that also has a single connection point to a transmission system, distribution system including closed distribution system or HVDC system; So unless an OWF has more than one connection point (e.g. C-Power) the PPM is the entire OWP according to this definition.
- Technical Facility (TF): the entire Power Park Module (PPM) is considered (cf. page 20)
- Technical Unit (TU):
 - Is this each individual wind turbine?
 - Or a string of wind turbines connected to a busbar?

- Or the entire PPM?
- Or can this be chosen in the case of an OWP?
- Delivery Point (DP): is a conceptual point that designates the level for market operations
 - By default, the Delivery Point is defined at the level of the Technical Unit, hence the definition of TU is to be clarified. If the TU is at turbine level, it is not feasible to provide schedules per turbine.
 - Can the delivery point be defined as a group of strings?
 - An exception is provided to define the Delivery point at the Technical Facility. As the Technical Facility is considered to be the PPM, this can only be a solution if the OWP can be split into several PPMs.
- Balancing Delivery Point (BDP): needs to be a Delivery Point or a group of Delivery Points (cf. orange box page 29) to be able to perform BRP corrections of balancing services.
 - From Figure 12 (page 31) we understand a BDP can be a group of turbines, correct?
- (p30) Schedules (as well as redispatching bids) will need to be delivered at the level of these DP's by the unique SA of this Technical Facility.
 - Can Elia clarify possible limitations linked to the fact that the SA is linked to a TF and not to a BDP, as shown in figure 12? Because the party delivering redispatching bids has to be the same as the BSP? Meaning that although more than 1 BRP can be assigned behind the Elia grid connection point, only 1 SA and thus also only 1 BSP is possible for the entire wind farm?

6.1. Design proposal – in general

Figure 9: Please clarify if in this schematic the double circle symbol is used for a metering device or as power transformer.

- In case a power transformer is intended, does this imply that a Balancing Delivery Point (BDP) of a wind park can only be defined per transformer and thus the wind park can only be split into groups of turbines connected to the same power transformer? This might be too restrictive. We envision the possibility to split a OWP into groups of strings.
- In case a metering point is intended, please clarify in the Figure to avoid confusion.

Figure 9 seems to indicate that a delivery point can group a string of wind turbines. But in that case, this is in contradiction to 3.5 stating that a delivery point is on the level of a TU or a TF (= entire PPM). A string of wind turbines is in between a TU and TF.

6.2 Notion of the Balancing Delivery Point

Rule 3: A BDP can be an AP, TF, TU or and aggregation of TU or TF. Hence the importance of clarifying the definitions in §3.5 in the context of an OWP.

6.3 Access point BRP

Can the BRP-AP be different from all BRPs allocated to the BDPs?

6.4 BRP allocations

- *“The possibility to appoint multiple BRP's downstream of an Access Point may be given only to Grid Users who are also their own Access Contract Holder.”*

We understand this reasoning, to ensure consistency / continuity responsibility, but it does seem contradictory to the iCAROS design, whereby roles that are also crucially dependent on each other

(SA and OPA) are split, and the Grid User remains responsible for the coordination between both roles and the consistency of the information provided by SA and OPA to Elia.

- Figure 10: Can the metering requirements be explained in a more detailed manner? What is the role of the BRP-AP in this scheme? Is this the same entity as the ACH?
- *“Allocations (including the consumption of the user’s own grid due to losses) should be made by the Access Contract Holder based on metering and calculations as agreed with the BRP’s active within the Access Point. Allocations will be communicated by the ACH to the BRPs, Suppliers and Elia on a daily basis [...]”*

What exactly needs to be sent to Elia on a daily basis? If every BDP needs an Elia metering device, the allocation is based on the meter readings, which Elia has access to. What still needs to be communicated?

- *“Allocations will be communicated by the ACH to the BRPs, Suppliers and Elia on a daily basis in a standardized file template (EXPORT92 or MIG 6) [...]”*

This seems very restrictive for Grid Users being their own Access Holder? Thus pushing these grid users towards the execution of it by Elia, which has to be paid for by the Grid Users?

6.6 Suppliers

“Suppliers are appointed by the Access Contract Holder and are informed in the Access Contract.”

Is in this case, the Supplier,

- (a) the entity with a supply license included in the list of Suppliers?
- (b) the entity that supplies energy to the OWF for “own consumption” during low wind periods?

In case of definition (b):

“In a BDP configuration, Suppliers should follow the same anchor point as BRP’s.”

Does this mean that if you appoint 3 BRPs, you also need to appoint 3 suppliers? Why would this be required. The supply agreement can be on the Access Point, with the supply appointed to the BRP_{AP}. OWF have consumption (of the OSS) before the string-meters, so having the supply on the same level as the BRPs, will give a mismatch between the sum of the supplies on the string levels, and the supply on the AP.