



ELIA System Operator NV/SA
Boulevard de l'Empereur 20, 1000 Brussels, Belgium

Tuesday, 13 July 2021

Dear Sir/Madam,

Nemo Link Limited (NLL) welcomes the opportunity to respond to Elia's Public consultation relating to the modification of Elia's LFC block operational agreement.

Nemo Link has the following remarks:

Section 3.1.2.2: Forced outages of NEMO Link

- We welcome Elia's effort to improve their flow forecasting of Nemo Link.
- From the document however, it is not clear to what extent the changing of the threshold improves the flow forecast. We therefore request that Elia makes the datasets of the flow forecasts available so that market parties can assess the accuracy in more detail. Nemo Link also uses flow forecasts for imbalance management purposes which can perhaps be used as a benchmark.
- We also note that, effective from 1 Jan 2021, Nemo Link's Day-ahead capacity rights are allocated and nominated explicitly. Because of the inefficiencies of the day-ahead explicit model, Nemo Link's commercial flow may at times deviate significantly from the implied price direction at DA stage. We also observe that LT capacity holders currently predominantly nominate in one direction (towards GB) even if the price spread reverses towards Belgium. It is important that these dynamics are considered in the Nemo Link flow forecast.

Section 3.3: Determination of maximal reduction of reserve capacity on FRR following sharing of FRR

- We note that Nemo Link has 20 MW overload export capacity to GB from 17:00 to 22:00. During these hours, the total export capacity (measured at the Belgian end of the interconnector) therefore increases from 1024MW to 1044MW. This overload is not available for import into Belgium.
- The overload does not seem reflected in Elia's assessment of the maximum capacity available for FRR sharing may perhaps also not be taken into account in the calculation of the forced outage risk (section 3.1.2). We encourage Elia to take Nemo Link's overload fully into account in its balancing needs assessment.

Bart Goethals
Chief Commercial Officer

Monne Depraetere
Products & Services Manager