

CONSULTATION REPORT

Report on the public consultation of the Balancing Rules

9/7/2024



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1. Introduction

Elia organized a public consultation from 29 March 2024 to 29 April 2024 regarding the Proposal for Amendment to the Balancing Rules. Prior to this public consultation, the proposed amendments have been discussed with stakeholders during a dedicated workshop that took place on the 29th of February 2024.¹

The purpose of this report is to consolidate the feedback received during the public consultation and to reflect Elia’s response and position.

2. Feedback received

During the public consultation, Elia received the non-confidential replies from the following parties:

- Centrica
- FEBEG
- Febeliec

All non-confidential responses have been appended to this report.

3. Instructions for reading this document

This consultation report is structured as follows:

- Section 1 contains the introductory context,
- Section 2 gives an overview of the responses received,
- Section 3 contains instructions for reading this document,
- Section 4 discusses the various comments received during the public consultation and Elia’s position related to the provided comments,
- Section 5 contains the annexes of the consultation report.

This consultation report is not a ‘stand-alone’ document but should be read together with the documents published for consultation, the reactions received from the market participants (annexed to this document) and the final Proposal for Amendment to the Balancing Rules.

Section 4 of the document is structured as follows with additional information on the content per column below.

Subject	Stakeholder	Comment	Justification
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¹ The slides presented are available on the [Elia website](#).

A	B	C	D
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- A. Subject matter covered by the various responses received.
- B. Stakeholder making the comment. In general, the comments are listed alphabetically in the name of the parties concerned.
- C. This document contains an overview of the main, but also specific comments on the document submitted for consultation.
 - In doing so, an attempt was made to list/consolidate all comments received.
 - In order to maintain authenticity, the comments have been copied as much as possible in this document. However, the comments have sometimes been shortened and the terminology has been harmonized to make the report easier to read.
- D. This column contains Elia's arguments as to why a comment was or was not included in the final Proposal for Amendment to the Balancing Rules.

4. Comments received during the public consultation

4.1 General comments received during the public consultation

This section provides an overview of the general reactions and concerns of market players that Elia received to the document submitted for consultation.

SUBJECT	STAKEHOLDER	FEEDBACK RECEIVED	ELIA'S VIEW
<p><i>General feedback related to the introduction of the elastic aFRR demand</i></p>	<p>Centrica</p>	<p>Italy withdrew from the PICASSO platform less than a year after joining due to pricing incidents. Subsequently, other system operators delayed their participation, awaiting measures to address the issue. ACER aims to resolve these concerns by June and encourages system operators to join the European balancing platforms by the legal deadline of July 2024.</p> <p>At Elia, you've been instrumental in devising strategies to mitigate price spikes, for instance by setting temporary price limits for contracted aFRR energy bids or promoting elastic demand.</p> <p>At Centrica, we understand the value of elastic demand in accessing additional balancing energy without resorting to high-priced bids. However, we urge caution to avoid introducing an element of discretion regarding frequency quality on the one hand, while imposing stringent balancing requirements on market participants on the other. Elastic demand should be subject to appropriate limitations. We urge you to:</p>	<p>Elia understands that Centrica is generally supportive of the proposal to introduce an elastic aFRR demand.</p> <p>With respect to transparency related to the elastic demand curve, Elia believes the proposal for the Balancing Rules provides transparency on the price and power thresholds for the application of elastic demand. The actual demand curve in a given MTU is however dependent on the total aFRR demand which is only known in real time.</p> <p>Elia understands Centrica's request to not deduct available non-contracted balancing energy bids from the aFRR needs while not activating them to relate to partial procurement of the aFRR needs. Elia would like to highlight that no partial procurement of the aFRR needs is yet foreseen. In addition, Elia would like to clarify that the power threshold for the elastic demand corresponds to the aFRR needs (i.e., the required aFRR reserve capacity). This required aFRR reserve capacity is determined pursuant the LFCBOA and is independent from the availability of free bids. As such, the required aFRR reserve capacity would not be directly impacted by partial procurement.</p>

		<ul style="list-style-type: none"> • Publish elastic demand curve information in advance to proactively provide transparency on the merit order and activation probabilities. • Don't deduct available non-contracted balancing energy bids ('free bids') from aFRR needs while not activating them, or replacing them with cheaper PICASSO bids. • Establish a clear framework to regularly assess the need and use of elastic demand, with close involvement of market participants. 	<p>Regarding an assessment of the need and use of elastic demand, Elia confirms that a return of experience on the use of elastic demand can be shared after having obtained sufficient experience following the connection to PICASSO. However, Elia believes it is important to make a distinction between on the one hand the bid price limit for contracted aFRR Energy Bids, which has been introduced as a temporary measure in the T&C BSP aFRR and for which Elia has committed to establish a process for a regular evaluation, and the application of an elastic aFRR demand on the other hand, which is a priori not considered to be a temporary measure, but for which it would nevertheless be relevant to provide a return-of-experience.</p>
	<p><i>FEBEG</i></p>	<p>FEBEG welcomes the recent proposals made by Elia to amend the aFRR balancing rules and introduce an elastic demand for aFRR balancing energy. FEBEG recognizes and appreciates the efforts of Elia and CREG in relation to the electricity balancing market. FEBEG wants to emphasize that it remains committed to connect to PICASSO. FEBEG is convinced that connection to PICASSO will contribute to creating a more integrated and efficient European electricity balancing market. This being said, FEBEG invites ELIA and the CREG to continue to engage with all market participants (who made big implementation efforts) in order to successfully connect to the EU market.</p>	<p>Elia would like to thank FEBEG for the support of the proposal to introduce an elastic aFRR demand.</p> <p>Elia would further like to emphasize that it has taken maximal measures to safeguard a connection to the aFRR Platform as early as possible (while not taking unacceptable risks related for the use of real-time applications).</p>
	<p><i>Febeliec</i></p>	<p>Febeliec heeft geen opmerkingen bij deze consultatie vermits zij in lijn is met het besproken compromis.</p>	<p>Elia understands Febeliec supports the proposal of introducing an elastic aFRR demand.</p>

<p><i>Conditions for connection to the aFRR Platform</i></p>	<p>FEBEG</p>	<p>It should also be pointed out that market participants are committed to connect to PICASSO provided they are not exposed to excessive risks. In this perspective, it is important to have sufficient liquidity and to have the necessary accompanying mitigating measures in place:</p> <ul style="list-style-type: none"> • Liquidity: Sufficient liquidity on the PICASSO platform would reduce the risk of price spikes: therefore, FEBEG finds it important to monitor the evolution of flexibility on the platform. RTE will bring significant additional liquidity to the platform: FEBEG is, hence, of the opinion that the best way forward for Belgium would be to couple to PICASSO keeping a close eye on the RTE connection date, not connecting too much before or too much after; • Accompanying mitigation measures: FEBEG supports the proposed introduction of temporary bid price limits for contracted aFRR energy bids and the application of an elastic demand for aFRR balancing energy. FEBEG believes that this is necessary to mitigate the risk of high prices. 	<p>Elia agrees with FEBEG that a connection to PICASSO should not come with excessive risks. For this reason, Elia has indeed proposed to introduce high-price mitigation measures, including among others the introduction of an elastic aFRR demand.</p> <p>Elia furthermore agrees that the liquidity on the aFRR Platform is important and that the accession of RTE to the aFRR Platform plays an important role for the liquidity. However, Elia would also like to highlight that the proposed mitigation measures are considered to sufficiently mitigate the high-price risk. As such, and in order to obtain a robust and stable planning, Elia does not consider the additional liquidity resulting from the accession of RTE before or shortly after Elia's accession to be a necessary condition for Elia's accession.</p>
<p><i>Price threshold for the aFRR elastic demand</i></p>	<p>Centrica</p>	<p>We note that the price threshold for elastic demand aligns with the temporary price cap on contracted aFRR energy bids at 1.000 EUR/MWh. We need clear regulations on this temporary price cap to ensure stable long-term contracts and prevent potential invalidation or renegotiation of contractual arrangements due to shifting risk profiles. Please provide a detailed timeline for reviewing, relaxing or removing the cap.</p>	<p>Elia takes note of the remark of Centrica.</p> <p>The temporary bid price limit for contracted aFRR Energy Bids is part of the proposal for amendment to the T&C BSP aFRR and hence strictly falls outside of the scope of this consultation.</p> <p>Nevertheless, Elia would like to emphasize that:</p>

			<ul style="list-style-type: none"> • Elia has made a proposal regarding the process for evaluating the temporary bid price limit that was discussed in the Working Group Balancing meeting of 28th of June 2024; • A potential modification or removal of the temporary bid price limit would follow from the results of the above-mentioned evaluations, which would be discussed in detail with the stakeholders; • The final modification or removal of the temporary bid price limit would require an amendment of the T&C BSP aFRR. Considering the above, Elia would like to highlight that the evaluation and following amendment would not happen overnight and that there would be a minimum time for stakeholders to consider a potential need for modifying their contractual arrangements.
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4.2 Specific comments received during the public consultation

SUBJECT	STAKE-HOLDER	FEEDBACK RECEIVED	ELIA'S VIEW
High-price mitigation in case of temporary disconnection from the aFRR Platform	FEBEG	Another concern of FEBEG is related to the situation, post the Go Live, where Elia would (in some cases) not be connected to the aFRR platform. FEBEG asks Elia to seriously consider the following suggestion. The article 10.c.i deals with the situation where Elia would not be connected to the aFRR platform. In such a case, the balancing rules indicate that the LMOL will be	Elia takes note and understands FEBEG's comment. In case Elia would be temporarily disconnected from the aFRR Platform while still being capable of performing the merit-order activation, the Balancing Rules indeed foresee to limit the LMOLs to the aFRR Energy Bids available up to the required reserve capacity on aFRR. Elia confirms that such a limitation on the local merit order list indeed did not

		<p>limited to the aFRR dimensioning. FEBEG disagrees with this limit because (i) such a limitation did not exist before the connection to PICASSO and (ii) it could lead to a situation where (competitive) aFRR energy bids offered by BSPs are filtered out. FEBEG does not think it is justified as long as the aFRR bid prices do not exceed the threshold price. Hence, LMOL should not be capped at aFRR dimensioned volumes but rather on the Max of (aFRR dimensioned volumes; aFRR energy bids below threshold price).</p>	<p>exist before the connection to PICASSO. However, Elia would like to clarify that this measure was already introduced in the previous revision of the Balancing Rules² as a way of mitigating the risk of potentially selecting high-priced aFRR Energy Bids to satisfy aFRR demands exceeding the required reserve capacity on aFRR as of the connection to PICASSO, and hence strictly falls outside the scope of the current proposal for amendment. Nevertheless, Elia agrees with FEBEG that the alternative solution proposed by FEBEG would have certain benefits and would be more consistent with the approach for the elastic aFRR demand when connected to the aFRR Platform. For this reason, Elia has analyzed the technical impacts of such a solution. The conclusion of the impact assessment was that this solution requires additional changes and implementations to the aFRR controller (on top of those related to the regular application of the aFRR elastic demand), and that adding such requirements would result in additional risks on the targeted date for connecting to the aFRR Platform. For this reason, Elia proposes to maintain at this stage the current approach, which Elia considers to be a pragmatic solution for the limited moments where this fallback procedure would need to be applied, but to consider the proposal of FEBEG for a following revision of the Balancing Rules.</p>
<p>Pro-rata selection of bids</p>	<p>FEBEG</p>	<p>FEBEG notes that technical issues experienced on the Elia controller could lead to aFRR energy bids being activated in a pro-rata selection (instead of merit order selection). We wish to highlight that this should be extremely exceptional and welcome Elia to report on such measures.</p>	<p>Elia confirms that a fallback procedure is in place in case technical issues prevent the local aFRR controller to perform a merit order selection of aFRR Energy Bids. Elia agrees that this fallback procedure should be avoided as much as possible. Elia further would like to highlight that in case this fallback procedure nevertheless would need to be used, Elia will report via an Urgent Market Message on the Elia Inside Information Platform as it has done in the past.³ As can be observed, although this fallback procedure is already in place for a long period, its usage has been extremely exceptional.</p>

² See [20230705 Public consultation on the TandC BSP mFRR in the framework of the MARI \(elia.be\)](#)

³ More specifically, as “Other market information”, Elia publishes an urgent market message with title “aFRR Balancing Activation in Back-Up Mode – Start/Stop” on the **Inside Information Platform page** in case pro-rata activation needs to be started as well as when it can be stopped again.

			<p>Considering the importance of avoiding pro-rata activations, Elia believes it is imperative that, following the implementation of the required changes related to elastic aFRR demand and the new aFRR activation method, the local aFRR controller is extensively tested and sufficiently stabilized before being put into production.</p>
Price thresholds in critical situations	FEBEG	<p>FEBEG reads in the balancing rules that the threshold price is a fixed value equal to –1000 EUR/MWh or + 1000 EUR/MWh. However, nothing is written regarding the possibility of reviewing that value or simply deviating from this entire process of elastic demand in case of critical events. This is an important missing element because – while we acknowledge the need of this temporary measure – there is no guarantee that such a calibration is future proof. We are definitely missing the possibility to deviate in case of critical events in which the network could be at risk and in which Elia would like to deviate from the threshold price and declare a higher inelastic demand. We therefore ask for more clarity on this.</p>	<p>Elia understands that FEBEG is concerned by the application of elastic demand in case of critical events.</p> <p>Elia confirms that the price thresholds for the elastic demand are indeed fixed at +/- 1.000 €/MWh. However, Elia would like to clarify that Art. 12.7 of the consulted Balancing Rules do foresee the possibility for Elia to decrease the elastic part of the aFRR demand (and hence to increase the inelastic part of the aFRR demand) in critical situations. As such, at least when having to go to alert or emergency state, it would be possible for Elia to immediately set the full aFRR demand as an inelastic aFRR demand (i.e., that would be satisfied regardless of the price of the available aFRR Energy Bids).</p>
Interaction with the Imbalance Netting Platform	FEBEG	<p>FEBEG is missing details on how Elia will make use of aFRR & IN (Imbalance Netting) platforms. Which one will prevail over the other one and how will these platforms coexist? According to an ENTSOE presentation the following steps are used to optimize aFRR means and needs. However, we do not find a description within the balancing rules. This is important because the process will lead to potentially cheap bids not being activated and there could be a lack of transparency. While we acknowledge that describing the process might not be easy to include in the balancing rules, we believe that they should at least refer to the relevant paragraphs of EU regulations.</p>	<p>Elia would like to clarify that the aFRR Platform and the IN-Platform will coexist as long as there is at least one TSO participating to the IN-Platform but not participating to the aFRR-Platform. The interaction between both platforms is handled via a sequence of three optimization steps as described in Art. 11.8 of the aFRR IF.</p> <p>To clarify the process, Elia has now added a new article (Article 12.8) to the Balancing Rules, which reads as follows: “The Activation Optimisation Function (AOF) of the aFRR-Platform optimizes the selection of standard aFRR balancing energy product bids and the automatic frequency restoration power interchanges on the aFRR balancing borders as described in article 11 of the aFRR IF. As long as there is at least one TSO participating in the IN-Platform which is not participating in the aFRR-Platform, the AOF of the aFRR-Platform handles the interaction between the aFRR-Platform and the IN-Platform via a sequence of optimizations as described in article 11(8) of the aFRR IF.”</p>

<p>Potential changes in case of major changes in the aFRR dimensioning</p>	<p>FEBEG</p>	<p>FEBEG agrees with the definition of aFRR elastic / inelastic / aFRR total demand such as:</p> <ul style="list-style-type: none"> • aFRR elastic demand = aFRR total demand – aFRR inelastic demand • IF aFRR total demand < dimensioning THEN aFRR inelastic demand = aFRR total demand • IF aFRR total demand >= dimensioning THEN aFRR inelastic demand = dimensioning <p>However, the concept of elastic demand and the above definitions should be rediscussed in case of major changes in the aFRR dimensioning leading to even lower procured volumes than today. For instance, a situation in which Elia would consider a partial procurement, where only 80MW out of 117MW would be procured should not lead to only 80MW of inelastic demand.</p>	<p>Elia understands FEBEG supports the approach for determining the inelastic and elastic components of the aFRR demand.</p> <p>Elia would further like to highlight that no partial procurement of the aFRR needs is yet foreseen. In addition, Elia would like to clarify that the power threshold for the elastic demand currently is set equal to the aFRR needs (i.e., the required aFRR reserve capacity). This required aFRR reserve capacity is determined pursuant the LFCBOA and independently from the availability of free bids (as such, not directly impacted by partial procurement). Finally, Elia emphasizes that in accordance with article 3(4)(a) of the aFRR IF, the power threshold for elastic aFRR demand must in any case be equal to or higher than the required aFRR reserve capacity.</p>
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5. Other amendments and next steps

Elia has adapted its Proposal for Amendment to the Balancing Rules in response to the feedback received from market players as outlined in Elia’s response set out in this consultation report.

In addition, Elia has adapted its Proposal for Amendment to the Balancing Rules after the public consultation pursuant to the ACER decision on the aFRR IF⁴, which contained certain changes relative to the proposal for amendment to the aFRR IF submitted by All TSOs.

First, the ACER decision on the aFRR IF contains changes with respect to the terminology related to elastic demand that was adopted in the All TSOs’ proposal for amendment to the aFRR IF and in the version of the Proposal for Amendment to the Balancing Rules that was publicly consulted. Therefore, the Proposal for Amendment to the Balancing Rules has been adapted in order to align the terminology with that of the ACER decision. Specifically:

- In the ACER decision, the term “elastic aFRR demand” refers to an aFRR demand of which the satisfaction partially depends on the price, and which is composed on an elastic part and an inelastic part. In contrast, in the Balancing Rules as publicly consulted, the term “elastic aFRR demand” was used to reflect the *elastic part* of the total aFRR demand.
- In the ACER decision, the term “power threshold of the elastic aFRR demand” has been introduced.
- In the ACER decision, the term “price of the elastic aFRR demand” is defined. In contrast, in the Balancing Rules as publicly consulted, the term “price threshold applicable for the elastic aFRR demand” was used.

Second, the ACER decision introduced an additional principle that shall be respected by TSOs submitting an elastic aFRR demand to the aFRR-Platform, namely that the formula to compute the price of the elastic aFRR demand and the price threshold for the elastic aFRR demand shall remain the same during all Market Time Units (MTUs, i.e. 4 seconds for aFRR) of an imbalance settlement period. A possibility is

⁴ That is, ACER Decision 08-2024 on the second amendment to the implementation framework for a European platform for the exchange of balancing energy from frequency restoration reserves with automatic activation.

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given in which a TSO may deviate from the power threshold computed by its formula at any MTU in case it declares a change of system state according to SOGL. In the version of the Proposal for Amendment to the Balancing Rules as publicly consulted, Article 12.7 foresaw the possibility for Elia to set a different power threshold for the elastic aFRR demand (and thus possibly increase the inelastic part of its aFRR demand) at any moment in case of alert or emergency state or in exceptional circumstances in case it is needed to prevent an alert or emergency state. Elia understands the new requirement in the ACER decision to be more strict in the sense that it allows for a deviation with respect to the formula for calculating the power threshold for the elastic aFRR demand within an imbalance settlement period only in case Elia declares a change of system state. In its decision, ACER indicates that TSOs have the possibility to integrate clear criteria for applying a different power threshold as part of the formula for creating the power threshold. At the same time, ACER acknowledges that TSOs might not have sufficient time to define and implement such a formula by the time they intend to start submitting elastic aFRR demands to the aFRR Platform. Considering this, the ACER decision specifies that the new requirement needs to be respected by no later than twelve months after the ACER decision. In this context, Elia has adapted Article 12.7 of the Balancing rules in the following way:

- The original article 12.7 is maintained until twelve months after the publication of the ACER Decision. This in order to maintain the possibility for Elia to change the power threshold for elastic aFRR demand without having to wait until an alert or emergency state can/needs to be declared ;
- An adapted and more strict version of the original article 12.7 would enter into force as of twelve months after the publication of the ACER decision.

It must be noted that in the coming year, Elia will further investigate the possibility to include specific criteria in the formula for calculating the power threshold for elastic aFRR demand. In case this would be considered opportune, Elia could propose a new Proposal for Amendment to the Balancing Rules.

6. Attachments

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29 April 2024

Consultation on Balancing Rules in the context of PICASSO

Dear Sybille, Alexandre, Kris,

Italy withdrew from the PICASSO platform less than a year after joining due to pricing incidents. Subsequently, other system operators delayed their participation, awaiting measures to address the issue. ACER aims to resolve these concerns by June and encourages system operators to join the European balancing platforms by the legal deadline of July 2024.

At Elia, you've been instrumental in devising strategies to mitigate price spikes, for instance by setting temporary price limits for contracted aFRR energy bids or promoting elastic demand.

At Centrica, we understand the value of elastic demand in accessing additional balancing energy without resorting to high-priced bids. However, we urge caution to avoid introducing an element of discretion regarding frequency quality on the one hand, while imposing stringent balancing requirements on market participants on the other. Elastic demand should be subject to appropriate limitations. We urge you to:

- Publish elastic demand curve information in advance to proactively provide transparency on the merit order and activation probabilities.
- Don't deduct available non-contracted balancing energy bids ('free bids') from aFRR needs while not activating them, or replacing them with cheaper PICASSO bids.
- Establish a clear framework to regularly assess the need and use of elastic demand, with close involvement of market participants.

Finally, we note that the price threshold for elastic demand aligns with the temporary price cap on contracted aFRR energy bids at 1.000 EUR/MWh. We need clear regulations on this temporary price cap to ensure stable long-term contracts and prevent potential invalidation or renegotiation of contractual arrangements due to shifting risk profiles. Please provide a detailed timeline for reviewing, relaxing or removing the cap.

Your consideration of industry views is crucial to improve balancing reserves and control consumer costs. Please contact us for any further clarification.

Yours sincerely,



Patrick Adigbli

Regulatory Affairs Manager, European Power Markets

Subject: FEBEG comments on ELIA's public consultation on the aFRR Balancing Rules
Date: 29 April 2024

Contact: Jean-François Waignier
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FEBEG thanks ELIA for having the opportunity to react to the *Public consultation on the Proposal for Amendment to the Balancing Rules in the context of the connection to the aFRR Platform*¹.

The inputs and suggestions of FEBEG are not confidential.

General comments

FEBEG welcomes the recent proposals made by Elia to amend the aFRR balancing rules and introduce an elastic demand for aFRR balancing energy. FEBEG recognizes and appreciates the efforts of Elia and CREG in relation to the electricity balancing market. FEBEG wants to emphasize that it remains committed to connect to PICASSO. FEBEG is convinced that connection to PICASSO will contribute to creating a more integrated and efficient European electricity balancing market. This being said, FEBEG invites ELIA and the CREG to continue to engage with all market participants (who made big implementation efforts) in order to successfully connect to the EU market.

It should also be pointed out that **market participants are committed to connect to PICASSO provided they are not exposed to excessive risks. In this perspective, it is important to have sufficient liquidity and to have the necessary accompanying mitigating measures in place:**

Liquidity

Sufficient liquidity on the PICASSO platform would reduce the risk of price spikes: therefore, FEBEG finds it important to monitor the evolution of flexibility on the platform. RTE will bring significant additional liquidity to the platform: FEBEG is, hence, of the opinion that the best way forward for Belgium would be to couple to PICASSO keeping a close eye on the RTE connection date, not connecting too much before or too much after.

¹ https://www.elia.be/en/public-consultation/20240329_public-consultation-on-the-proposal-for-amendment-to-the-balancing-rules

Accompanying mitigating measures:

FEBEG supports the proposed introduction of temporary bid price limits for contracted aFRR energy bids and the application of an elastic demand for aFRR balancing energy. FEBEG believes that this is necessary to mitigate the risk of high prices.

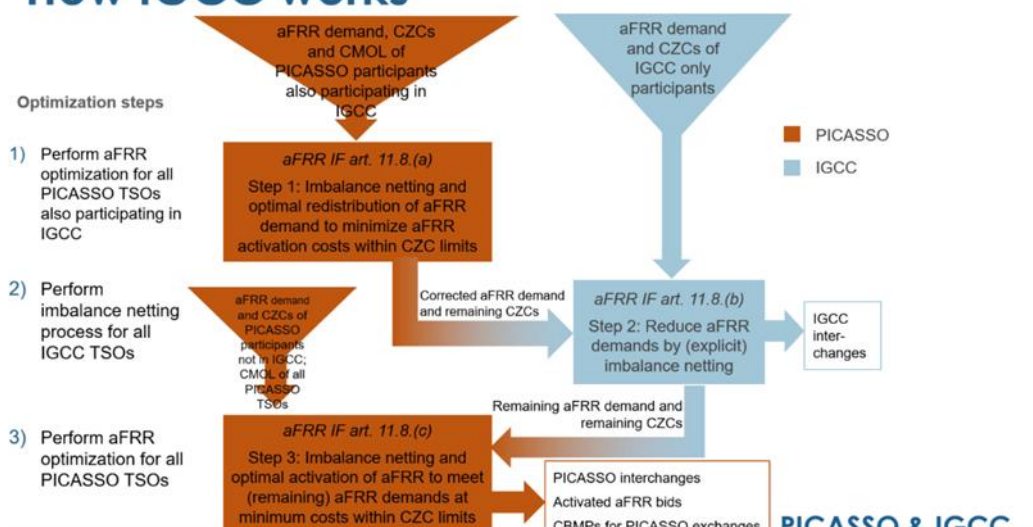
Another concern of FEBEG is related to the situation, post the Go Live, where Elia would (in some cases) not be connected to the aFRR platform. FEBEG asks Elia to seriously consider the following suggestion. The article 10.c.i deals with the situation where Elia would not be connected to the aFRR platform. In such a case, the balancing rules indicate that the LMOL will be limited to the aFRR dimensioning. FEBEG disagrees with this limit because (i) such a limitation did not exist before the connection to PICASSO and (ii) it could lead to a situation where (competitive) aFRR energy bids offered by BSPs are filtered out. FEBEG does not think it is justified as long as the aFRR bid prices do not exceed the threshold price. Hence, LMOL should not be capped at aFRR dimensioned volumes but rather on the Max of (aFRR dimensioned volumes; aFRR energy bids below threshold price).

Specific comments on the changes

FEBEG reads in the balancing rules that the threshold price is a fixed value equal to - 1000 EUR/MWh or + 1000 EUR/MWh. However, nothing is written regarding the possibility of reviewing that value or simply deviating from this entire process of elastic demand in case of critical events. This is an important missing element because - while we acknowledge the need of this temporary measure - there is no guarantee that such a calibration is future-proof. We are definitely missing the possibility to deviate in case of critical events in which the network could be at risk and in which Elia would like to deviate from the threshold price and declare a higher inelastic demand. We therefore ask for more clarity on this.

FEBEG is missing details on how Elia will make use of aFRR & IN (Imbalance Netting) platforms. Which one will prevail over the other one and how will these platforms coexist? According to an ENTSOE presentation the following steps are used to optimize aFRR means and needs. However, we do not find a description within the balancing rules. This is important because the process will lead to potentially cheap bids not being activated and there could be a lack of transparency. While we acknowledge that describing the process might not be easy to include in the balancing rules, we believe that they should at least refer to the relevant paragraphs of EU regulations.

How IGCC works



FEBEG agrees with the definition of aFRR elastic / inelastic / aFRR total demand such as:

- aFRR elastic demand = aFRR total demand - aFRR inelastic demand
- IF aFRR total demand < dimensioning THEN aFRR inelastic demand = aFRR total demand
- IF aFRR total demand >= dimensioning THEN aFRR inelastic demand = dimensioning

However, the concept of elastic demand and the above definitions should be rediscussed in case of major changes in the aFRR dimensioning leading to even lower procured volumes than today. For instance, a situation in which Elia would consider a partial procurement, where only 80MW out of 117MW would be procured should not lead to only 80MW of inelastic demand.

FEBEG notes that technical issues experienced on the Elia controller could lead to aFRR energy bids being activated in a pro-rata selection (instead of merit order selection). We wish to highlight that this should be extremely exceptional and welcome Elia to report on such measures.



A new answer to the consultation "20240328_Public consultation on the Proposal for Amendment to the BalancingRules" has been submitted on our website.

Name	Michaël Van Bossuyt
Email	mvanbossuyt@febeliec.be
Organization	FEBELIEC
Comments/suggestions to the consultation	Febeliec heeft geen opmerkingen bij deze consultatie vermits zij in lijn is met het besproken compromis.
Answer confidential ?	Completely non-confidential