



## Answer from BSTOR SA/NV to the public consultation on the revision of the FCR and aFRR Energy Management Strategies requirements for Delivery Points with Limited Energy Reservoirs

BSTOR SA/NV (“BSTOR”) welcomes the opportunity given by Elia to provide feedback and would like to thank Elia for their efforts to provide clarity and transparency on the proposal.

Please find below BSTOR contribution to the consultation. This answer can be considered as non-confidential.

### **Answer to the consultation**

BSTOR generally understands the need for clear and transparent guidance on energy management requirements and supports the revision and harmonization of current requirements, but has at the same time some concerns.

BSTOR feels that the focus put by Elia on energy management strategies for limited energy reservoir may be exaggerated. It is just one among other technical requirements for taking part to the services, to which the same, not less, not more attention should go as other requirements in prequalification and monitoring checks.

Every technology (thermal plants, demand response, renewables, etc) indeed comes with its operational constraints, and with risks to fail delivering contracted power for unlimited periods in time and/or within the required FAT and/or for the full contracted power, that can be inherent to the limitations of the technology or to associated gaming behaviour.

BSTOR further feels that Elia proposals are drafted using as a reference a too idealistic model of a large, stand-alone battery storage systems identified as an “energy tank” with very well identified capacity and remaining “headroom” for additional chargeable and dischargeable capacity, while

- Energy limited assets also include demand side units on which concepts such as state of charge and energy retention capacity can’t be easily computed or monitored (cooling process that can be delayed as long as temperature within certain band for instance);
- BSPs rely on pools with increasing number of assets of all types of power and voltage level, on which applying a certain state of charge and energy retention capacity is impossible/goes with statistical intervals of confidence etc;
- Even for large scale BESS, state of charge and energy retention capacity aren’t as unequivocal indicators as Elia seem to believe.

BSTOR recognizes the need for energy management requirements during the prequalification stage for assets with a limited energy reservoir are justified since prequalification happens on well identified (pools of) technical units, but believes structural monitoring during service delivery brings significant

additional burden, may get very complex in large portfolios, should remain technology neutral and focus on the BSP portfolio as a whole not on specific assets.

BSTOR supports Elia's view that both availability tests and continuous monitoring aren't adequate solutions because too expensive and complex. However, we also have several concerns with the targeted monitoring:

- If a monitoring strategy would be implemented, it should be technology neutral for complying with the EBGL, meaning all technologies participating in ancillary services should report on their operational limitations. Otherwise this creates additional burden for LERs specifically, creating an unfair competition.
- For the sake of technology neutrality (and standardization procedures) the same set of parameters should apply to all technical units/pools, which seems difficult to achieve in BSTOR's opinion.
- Additional burden for BSPs (and Elia) while the need for monitoring has not emerged yet.
- Which data would Elia precisely need, and how would a BSP need to prove certain behaviour is or isn't linked to the EMS?
- Complex in large portfolios: as the share of decentral (LER in particular) assets is growing in pools, it would get increasingly complex to justify the behaviour of single assets, or of a part of the capacity of the LER asset itself, which are likely to operate outside the pool as well, eg reacting to imbalance price or intraday trading which is not necessarily related to energy management.

As a result, BSTOR requests Elia to make sure and establish that the burden for proposed monitoring procedure (including for Elia) is compensated by sufficient added value, and in fact doubts it is the case due to the impossibility to establish a "one size fits all" parameter set, on which Elia could program standard postprocessing.

Instead, BSTOR proposes to stick with the current ad hoc monitoring approach; where Elia can request justification in case of suspicious activity, which can also be done much closer to real time than the proposed approach.

Next to the concerns expressed above, we also have some minor comments and question.

- BSTOR appreciates the improved framework around combining contracted services, and combining contracted with non-contracted services
- BSTOR appreciates the improved framework around the statistical analysis to demonstrate the capability of delivering certain volumes
- BSTOR appreciates the opening towards trading sub-hourly products on the intraday market
- BSTOR requests clarification on the difference between reactive balancing and imbalance charging and how the distinction between the two is going to be made in practice. Does it only depend on whether the direction of the activation helps restoring the system imbalance?