

Centrica Energy's response to ELIA's public consultation on the revision of the FCR and aFRR Energy Management Strategies requirements for Delivery Points with Limited Energy Reservoirs

11th November 2024

Dear Nicolas, Kris, Rafael,

Centrica Energy (CE) welcomes the opportunity to respond to Elia's October 2024 consultation paper concerning Energy Management Strategy (EMS) requirements for Delivery Points (DP) with Limited Energy Reservoir (LER).

As an operator of battery assets within the Elia network, CE overall has a positive view of the proposed modifications to the EMS requirements. We have the following specific comments on the consultation:

EMS for combo's

We support the conclusion that EMS requirements should not be extended to the mFRR program. However, we see additional administrative burdens in the form of additional information requests for aFRR and FCR services. In addition, the consultation does not discuss the threshold of rejection of the documentation should they contain any unintended errors. Further clarity that could be given on this point would be welcomed, as without this there remains uncertainty.

Combo's with non-contracted services

We do not agree with the proposal that the intended use of the DP with LER for non-contracted services needs to be described in the EMS. This requirement would be overly burdensome. Given that the EMS already sets out what will be provided for FCR/aFRR services, any further requirements would only add difficulty to a market participant's decision making, even when they are not in breach of the rules governing their EMS.

If this proposal were still to be pursued, CE suggests the requirement for describing the non-contracted services only applies to power that is used in the EMS. For example, in the case of partial selection in the contracted service, when there is battery power that is not required for the EMS, there should be no limitations on how that power is used.

Intraday transactions

The proposal to relax the intraday products, and therefore allow market participants to manage assets closer to real time is welcomed.

Approach for updating the dataset

It would be appreciated if Elia could give some additional details explaining how the dataset handles the period where the previous one year contains Picasso and non-Picasso periods.

Application of the targeted monitoring for FCR

We do not endorse this inclusion. Elia is currently investigating the possibility of continuous monitoring in FCR, we suggest to onboard EMS monitoring into this evolution. The application of the targeted monitoring for FCR will increase the administrative and technical burden on (Balancing Service Providers) BSPs and the value would not outweigh these additional costs/burdens.

Best regards

Shamsi Khan