

Subject: Public consultation on proposal for amendment to the Terms and Conditions for balancing service providers for the Frequency Containment Reserve Service: FEBEG reaction

Date: 18 November 2024

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This note presents the reaction of FEBEG and its members to the public consultation organised by Elia on proposal for amendment to the Terms and Conditions for balancing service providers for the Frequency Containment Reserve Service (T&C BSP FCR). FEBEG would like to thank Elia for the organization of this consultation. The comments and suggestions of FEBEG are not confidential.

1. General feedback

FEBEG appreciates the clarity of the documents under consultation. The design note provides clear explanation on the design changes for FCR and indicates which parts of the T&C are amended.

FEBEG understands the evolutions presented in this consultation are a consequence of the modifications in SO Regulation requested by Commission Regulation EU.

FEBEG members have been consulted previously and we do not consider relevant to provide comments on the introduction of the additional properties in this consultation launched by Elia. However, we find important that the changes in SO regulation are correctly translated in the T&C FCR. Those change will require some implementation and to follow new rules. The changes in the T&C must be crystal-clear to avoid confusions on the rules.

2. Specific feedback

The changes presented in the documents seems very targeted for battery storages (BESS). FEBEG wants to remind that Limited Energy Reservoirs can be other technologies than BESS. Do we need to conclude that only BESS are impacted by these additional properties?

Similarly, some BESS have quite large Energy to Power ratio (e.g. 100 MW and 400 MWh, which is a ratio equal to 4) with long ability to deliver energy in one direction. Can we consider these are exempted from the amendments under consultation?

The design note and the T&C FCR often refers to the concept of State of Charge (SoC). We have two comments. Firstly, there is no definition corresponding to SoC which leaves it open for interpretation. Secondly, State of Charge is relevant information for battery storage (BESS) but LER is wider than BESS only.

The design note and the T&C's do not refer to the efficiency of a LER. This means the percentage of the percentage of additional energy to recharge LER (e.g. recharging 100 MWh could 'consume' up to 115 MWh). FEBEG is asking if it is intentional not to include this element?

We were also wondering whether targeted units by additional properties which are already prequalified would need to prequalify again (at the moment T&C enter into force)?

3. Conclusions

FEBEG wants to remind that new large-scale BESS will be commissioned in 2025 and full clarity on the rules and implementation requirements are of utmost importance.

While we acknowledge not to have major comments on the design, we would appreciate Elia *(i)* to answer the questions in this document, *(ii)* to make its best efforts to provide as much accurate information in the T&C FCR and *(iii)* publish the updated technical guide in early 2025.
