

Feedback on the public consultation on the proposal for modification of the T&C OPA in the framework of the release 1 of the phase 2 of the iCAROS project

BOP took notice of the public consultation launched by Elia on 31 January 2025 on the “proposal for modification of the terms and conditions for the outage planning agent in the framework of the release1 of the phase2 of the iCAROS project”. In this reaction we would like to respond to this consultation. We remain available for further collaboration and questions whenever deemed necessary.

Operational context of offshore assets vs. changes to the availability plan (art. II.8)

We understand the OPA has to submit a year-ahead availability planning subject to Elia’s validation with a quarter-hourly granularity. Any changes to the Availability plan from that moment in time are to be communicated as soon as possible and require active/manual approval by Elia.

This timing might make sense for traditional and predictable production units, but seems rather odd for weather-dependent production units. Especially offshore, also maintenance is weather dependent and can thus not be accurately forecasted in that timeframe with the requested granularity.

Even if such granular info could be given (for other technologies) at that timeframe, would Elia already draw any conclusions from that quarter-hourly data that Elia would not be able to draw if only daily (or hourly, as an intermediate step) data would have been provided? BOP proposes to only move to quarter hourly basis much closer to real-time, e.g. 1 month before.

The maintenance schedules for offshore wind farms are only tentatively planned one week ahead, and subsequently confirmed on D-3 (or even D-2) with a final GO/NOGO decision on D-1, depending on the weather forecasts. In the proposed approach the availability plans will always need to be manually approved for all offshore wind parks. Offshore wind farms will thus always be at risk (as opposed to other technologies) of having their internal maintenance planning rejected or conditionally accepted (leading to costs for the OWF).

Some comfort is given in the Explanatory Note provided with this public consultation that change request will be handled fast: *“To handle the change request of the OPA, Elia has an operational team available 24/24 7/7 that gives priority to change request linked to a time horizon D-2. As such in practice the approval for changes without any operational security risks feels like automatic acceptance.”*

Furthermore, from bilateral discussions, we understood that rejection of change requests for offshore wind parks will be rare as (i) for adequacy reasons, maintenance of Elia assets is maximally planned during low wind timeframes (ii) congestion issues typically reduce when lowering the P_{max} of offshore assets (iii) Elia uses thresholds within its security analyses to check the importance of change requests and in order to prioritise them and (iv) offshore maintenance works are too the largest extend possible aligned and discussed between the maintenance teams of Elia and the offshore wind parks. Could Elia please confirm this in its response to this consultation.

However, the T&C OPA does not provide any comfort to the OPA that (i) a request will be dealt with as soon as possible (a 'best effort' obligation on Elia), (ii) will only be refused in case of serious grid issues where other market-based measures are not available, and (iii) Elia will provide sufficient justification in case of a refusal. We understand from Elia that it is indeed their intention to apply the approval process in such manner; it should therefore not be controversial to formalize this in the T&Cs as well.

We also would like to request Elia to further investigate options to (semi-)automate the approval process, especially under circumstances without operational security risks, in order to handle inevitable change request for offshore wind parks as fast as possible and to reduce the amount of manual approvals by Elia to situations entailing security risks.

Validation criteria for change requests

From bilateral discussions, we understood that change requests from the OPA are evaluated according to criteria described in the Rules for Coordination and Congestion Management. However, barring an error, no reference is made to the Rules for Coordination and Congestion Management in Art. II.8 "Changes to the availability plan" of the T&C OPA.

Furthermore, the Rules for Coordination and Congestion Management (Art. 4) lack of detail with regards to how change requests will be evaluated. The report on Congestion Management to the CREG does not provide sufficient comfort in this regard neither, as it focusses on Costly Remedial Actions or additional Remedial Actions after the closure of the Day-ahead Market, and approvals or rejections of availability plans are thus not included.

We insist on including transparent evaluation criteria that will be used to approve or reject the status change request in the T&C OPA and/or the Rules for Coordination and Congestion Management. This transparency is required in order to guarantee and to be able to verify the correct implementation of freedom of dispatch and avoidance of use of "security of the grid" as a black box reason unilateral TSO decisions.

Prolongation of planned maintenance

Regarding Art. II.8.8 of the T&C OPA: *"In deviation of Art. II.8.5, ELIA will not reject an OPA change request concerning a prolongation of maximum 5 Working Days of planned maintenance that has already started. This involves solely an Availability Status change requested during a period of Unavailability to change one or more subsequent quarter-hour(s) from Available to Unavailable"*.

Can Elia confirm that this extension does not cater to unplanned events during a maintenance campaign which lead to a Forced Outage? i.e. maintenance was planned for 3 days, but due to a technical issue, the facility is unable to re-start as planned. The status would be updated to FO (which cannot be refused).

The current wording also seems to indicate that an extension beyond the 5 days would automatically be rejected? However, from the underlying documents, it seems that the intention was to automatically approve any extension under the 5 days, and that an extension beyond the 5 days would be treated as any other change request, i.e. with the *option* of a rejection.

BOP considers 5 days a reasonable timeframe for most maintenance campaigns. But additional days could be given for non-standard (i.e. longer) maintenance campaigns of more than [30] days.

Impact on Royal Decree Liabilities

The risk of unavailability of Elia offshore assets is protected for the offshore wind park via the Royal Decree Liabilities and Royal Decree MOG (and soon a Royal Decree MOG2). We want to raise that any changes to the T&C OPA may not have any effect on compensations foreseen in these royal decrees.

Could Elia please confirm there is no interference between the T&C OPA and the protection of the offshore wind parks as provided for in the RD Liabilities, RD MOG and RD MOG2?

As a concrete example, let's consider that:

An OWF has a maintenance planned for week 3 in August. Based on this planning, Elia plans a partial outage of the MOG2 assets (over and above the threshold for non-compensation under the RD Liabilities; i.e. compensation would be due). However, due bad weather, the OWF postpones its maintenance campaign.

Can Elia confirm that the compensation due by Elia under RD Liabilities to other OWF would not be a cost associated with the change request, and thus be paid by the OWF.

If the OWF is to remain curtailed due to the unavailability of the MOG, this could be achieved via two routes: (i) the change request is refused based on this argument, or (ii) the change request is accepted, but Elia sends a curtailment signal to the OWF (as standard in case of MOG unavailability). Given the real-time nature of the curtailment signal, BOP prefers the latter option. Can Elia however confirm that in both cases, Elia has no grounds to refuse compensation due to the OWF based on the RD Liabilities?