

## Febeliec answer to the Elia consultation on the test plan

Febeliec would like to thank Elia for this consultation on the test plan. At this point, Febeliec has mostly some general comments on the testing regime in general. While Febeliec understands that testing, is important to ensure that in case of an emergency the system integrity can be maintained by Elia in order to avoid a (partial) blackout, it is also important that the tests should be reasonable both in scope and frequency, as costs are not remunerated, and that to the extent possible all other means should be used to validate the performance of an installation if this can avoid (costly) tests.

Febeliec appreciates that at this point Elia does not foresee to include tests for providers of protection from demand response. Febeliec also appreciates that no protection or restoration measures will be considered that surpass the capabilities of the installations as specified in the connection agreement, in order to avoid (considerable retroactive costs. Febeliec also insists that for SGUs without contract for protection or restoration services such tests should only be done at the moment they are taken into service (or significantly modified).

Febeliec also asks Elia to inform all the concerned SGUs in due time, in order to allow them also sufficient time to ensure that they can comply with the necessary requirements under the test plan (e.g. installation of an Elia phone).

Febeliec as always remains available for further discussion on the test plan and its evolution over time. Febeliec also offers to relay all relevant information to its members, even though it will not receive a list of all concerned SGUs, in order to provide an additional communication channel and if necessary communication forum via its working groups.