

Febeliec answer to the CREG consultation on the modifications for the CWE Intraday increase/decrease process in the CORE Region

Febeliec would like to thank CREG for this consultation on the request for approval of Elia for the modifications to the CWE increase/decrease process in the framework of the coordinated intraday capacity calculation methodology in the CORE region.

Febeliec supports the increase/decrease process currently existing in CWE and insists that it is maintained and even extended in the CORE region, both in geographical scope (all CORE borders instead of only the CWE borders) as in methodological scope (obligation to apply the increase/decrease process for any given market time unit). Febeliec however remains adamant that no capacity is to be reserved for the intraday allocation (thus continuing the current practice and to avoid negative effects on earlier timeframes), with all intraday capacity given to the market the result of non-used day ahead capacity, the increase process or netting effects. As such, Febeliec strongly insists that every TSO applies each day the increase process on all borders, in order to ensure that all available capacity is given to the market. Febeliec also insists that TSOs push towards increasing this capacity by a.o. recalculating cross-border domains as uncertainty decreases when moving from day ahead towards realtime, thus normally freeing up additional cross-border capacity for the intraday time frame (as well as for the realtime balancing timeframe for the future coupled European balancing market).

Concerning the proposed approach, Febeliec has some comments. Febeliec a.o. regrets that the “central activity” is limited to consolidation and publication, and that the requests themselves as well as the assessment of the requests remains solely a ‘local activity’. Febeliec insists that requests for increases should become mandatory and also insists that the approaches for the assessment on the local level are towards the future harmonized as well as justified (in case of rejection of increase requests but also towards the volume of increases that are accepted and allocated, both for full and partial acceptance) as it is important that the market players can not only understand the approach of the TSOs but also challenge it in order to ensure that as much capacity as possible is released to the market (as grid users are paying for 100% of this cross-border capacity, in particular consumers).

Concerning the decrease process, Febeliec insists that this remains exceptional and should only occur whenever grid security is severely threatened (to the extent that solving the issue in the realtime timeframe seems unfeasible or too expensive).