

Febeliec answer to the Elia Public consultation of the study on the evolution of the BRP nominations

Febeliec would like to thank Elia for this consultation on the study on the evolution of the BRP nominations.

Febeliec would like to indicate that it is of the utmost importance to ensure that the proposed modifications are feasible both from a design perspective as well as from an implementation perspective, implying that sufficient time is foreseen for all concerned parties to be able to move towards the target design, in particular for those parties who currently have no direct obligations, referring a.o. to the responsibility of providing information on the expected offtake of demand facilities in MW schedules. In general, Febeliec wants to insist that any (additional) information, especially from parties who had no prior obligations and will thus have to allocate additional resources, should only be requested when a clear added value for the system is identified which outweighs the related costs. Moreover, Febeliec wants to point out the specific situation of a.o. closed distribution systems, with often multiple demand and generation facilities owned by different actors, as well as the treatment and responsibilities concerning schedules for smaller grid users, up to the level of SMEs and even residential consumers. Febeliec asks for timely clarity on the final design as well as a realistic timeframe for the development and deployment of a framework for allocating the responsibility of providing information on the expected offtake of demand facilities to the role of the scheduling agent, for which at the moment a derogation is in place. Febeliec strongly insists on a co-creation process for the design and contractual framework, in close relation with all concerned stakeholders.

Concerning the full removal of the day-ahead balancing obligation, Febeliec wants to stress that the decision on the permanent and full removal has not yet been taken and is still subject to analyses on the potential negative impact of such removal on a.o. the stability of the system as well as balancing volumes and costs. Hence, it is not guaranteed that this necessary boundary condition will be met, for which the decision should be completely independent of the impact on the discussion on BRP nominations.

In light of the above comments on the boundary conditions and insofar those conditions would be met, Febeliec supports a multi-step approach with a realistic timeline for the implementation of the different steps. Febeliec insists that only efforts will be requested from grid users that will effectively be used and cannot be obtained in sufficient quality by any other means, while at the same time Febeliec understands that in order to ensure a secure operation of the grid information is needed to be able to conduct the necessary analyses. Febeliec understands that there are some quick wins and no regret changes (e.g. specific information which has been identified which is not necessary for a secure operation of the grid) and supports their implementation, insofar the above is taken into account.