

Febeliec answer to the Synergrid consultation on the vision paper concerning multiple supply contracts per access point

Febeliec would like to thank Synergrid for this consultation on its vision paper concerning multiple supply contracts per access point. In general, Febeliec supports the reasoning behind and the work done by Synergrid to enable multiple supply contract per access point and considers the vision paper a very good step forward for residential and other low voltage grid users. However, for medium voltage/industrial/professional grid users, and as already indicated from the start of the discussions, Febeliec is adamant that more degrees of freedom are necessary than for residential grid users, as the use cases are different from a house with an electric vehicle (from the same or a different owner) and a heatpump and thus the model should tailor for more elaborate use cases with (many) more delivery points than envisaged for residential grid users in more complex patterns. Moreover, these medium voltage/industrial/professional grid users will need more degrees of freedom in how they re-invoice grid tariffs, surcharges, taxes and so on, as these can and will be tackled in their contractual arrangements related to all those delivery points. Last but not least, a specific solution will have to be found for Infrabel as it is connected to several distribution grids (but also local transport grids and the transport grid) and will have yet again other use cases and constellations of delivery points behind its access points. Febeliec also wants to refer to and support the answer to this consultation by Infrabel.

As mentioned above, the needs for medium voltage/industrial/professional grid users are different than those for low voltage/residential grid users, and could for example be better covered with the possibility to allocate self-consumption over several additional headpoints. The same applies to the allocation of the total grid fee charged to the grid user, which might for professional grid users be allocated according to contractual arrangements that differ from the “standard” approach for residential grid users with e.g. an electric vehicle, home battery or heatpump as the use cases might be more complex, including (many) more delivery points and headpoints as well as different constellations of ownership of metering devices. Febeliec thus asks for more degrees of freedom as compared to a “*standard (to be defined) algorithm*” in order to be able to tackle splitting the grid related fees in respect of contractual arrangements. Also regarding settlement, for medium voltage/industrial/professional grid users it is important that all three options for commodity optimization are allowed (while Febeliec could understand that for residential/low voltage grid users a more standardized approach would be chosen) and that in any case at this point of the design no (future) options are to be excluded.

Concerning serial or parallel configurations and in light of the above, Febeliec appreciates the fact that both configurations will still be possible, as the parallel configuration resembles a shared connection, which could be of use in certain cases (and even combinations of e.g. a parallel with behind that a serial configuration). Concerning submetering, Febeliec appreciates the different types of submeters that are envisaged in the model, yet regrets that the number of submeters and related commercialised “appliances” (a description that is not really applicable to industrial grid users) are limited to 6 (or any lower limit defined in regional legislation) and would like to oppose such limitation for medium voltage grid users (as a future-proof design and implementation should not impede any further increase in this number in any case). Similarly, it is important for medium voltage/industrial/professional grid users to be able to have an access point which can be split several market headpoints which can be split again in several service delivery points. In general, it is important to acknowledge that the needs for multiple supply contract on an access point for medium voltage/industrial/professional grid users are very much diverging from the mainly used use case of electromobility (one or two cars), a home battery and/or a heatpump, as it will concern more contracts, multiple charging points, different ownership structures, ... For a specific case such as Infrabel, with the Tractienet Spoor, some concepts such as the cascade-principle could create issues as it concerns a multi-site user, where this principle could create problems (for a more detailed insight, Febeliec refers to the answer of Infrabel on the consultation).

Febeliec represents industrial energy consumers in Belgium. It strives for competitive prices for electricity and natural gas for industrial activities in Belgium, and for an increased security of energy supply. Febeliec has as members 5 business associations (Chemistry and life sciences, Glass, pulp & paper and cardboard, Mining, Textiles and wood processing, Brick) and 39 companies (Air Liquide, Air Products, Aluminium Duffel, Aperam, ArcelorMittal, Arlanxeo Belgium, Aurubis Belgium, BASF Antwerpen, Bayer Agriculture, Beaulieu International Group, Borealis, Brussels Airport Company, Covestro, Dow Belgium, Etex, Evonik Antwerpen, Glaxosmithkline Biologicals, Google, Ineos, Infrabel, Inovyn Belgium, Janssen Pharmaceutica, Kaneka Belgium, Kronos, Lanxess, Nippon Gases Belgium, Nippon Shokubai Europe, NLMK Belgium, Nyrstar Belgium, Oleon, Pfizer, Proxiums, Sol, Solvay, Tessenderlo Group, Thy-Marcinelle, Total Petrochemicals & Refining, UCB Pharma, Umicore, Unilin, Vynova and Yara). Together they represent over 80% of industrial electricity and natural gas consumption in Belgium and some 230.000 industrial jobs.

Febeliec would greatly appreciate the possibility for having virtual and calculated meters, which allow closer linking to contractual arrangements without necessarily the obligation to install submeters everywhere, as long as delineation of the perimeters of service delivery points can be correctly done. Concerning (sub)meters, Febeliec also wants to point specifically to the situation of closed distribution grids, where the operator of the CDS will in any case have to be implicated to ensure correct allocation (and which immediately also gives an indication of how multiple supply contracts behind a single access point are currently already used with the application and management of an access register within these CDSs and which could be an inspiration on how to organise this for medium voltage/industrial/professional grid users in general). Moreover, some of the submeters in closed distribution grids could also be regulated meters, albeit potentially by other applicable regulation (e.g. Tractienet Spoor). Furthermore, Febeliec wants strongly to insist that the principles proposed in this vision paper are not directly and necessarily transposed to closed distribution systems.

In any case as a final comment, Febeliec insists that any design choices made at this point to kickstart the possibility for multiple supply contracts per access point do not impede future evolutions towards the points raised by Febeliec regarding the specific cases of medium voltage/industrial/professional grid users and their future needs.