

FebelieC answer to the Elia consultation on forecasting of the deterministic frequency deviation and the Elia contribution

FebelieC would like to thank Elia for its consultation on the forecasting of the Deterministic Frequency Deviations (DFDs) and the Elia contribution to these DFDs.

FebelieC understand the importance of the analysis, and wants to avoid that Elia could be forced to contract additional balancing reserves as a penalty for going beyond its allowed threshold, as this would incur additional costs for grid users in their grid tariffs. Moreover, as these additional reserves would put even more strain on an already challengingly limited merit order, the cost implications could be quite important.

However, FebelieC also would like to warn against taking too many costly actions to avoid or limit DFDs, as these also come with a cost and could even lead to overshoots. It is important to strike a (fine) balance, based on a cost-benefit analysis of the chosen path, ex ante but also ex post, to ensure that the chosen option is still the optimal solution.

The above is even more so valid because FebelieC understands from the analysis from Elia that Elia could also take action even if the risk is high that it was not contribution to the DFD, due to the lack of accuracy of the ACE contribution forecast. This implies incurring costs, at the detriment of grid users, in situations where this might not have been warranted. While FebelieC understands that perfect forecast only exist in theory and not in practice, it is important that the occurrence of such situations is limited as much as possible.

Concerning the proposed options, FebelieC can only take note of the analysis from Elia, as well as the conclusions drawn by Elia regarding the chosen differentiated approaches for upward and downward DFD (with aFRR and mFRR for upward and only aFRR for downward). Concerning the conclusions on possible mitigation measures, FebelieC follows the reasoning of a stepwise approach and looks forward to the results of the first step in order to define possible next steps.