

Febeliec answer to the Elia consultation on the Terms and Conditions applicable to providers of restoration services and the procurement process for restoration services

Febeliec would like to thank Elia for this consultation on the Terms and Conditions applicable to providers of restoration services and the procurement process for restoration services.

Febeliec welcomes the extension offered by Elia regarding the participation to the black start service to more units, via extended aggregation possibilities, as well as a new public procurement process with a competitive dialogue. Febeliec hopes that this will bring more liquidity in this market and thus lower costs for grid users.

On the competitive dialogue, Febeliec can support such approach insofar it does not lead any ex ante preferential treatment for any candidates.

Febeliec as mentioned above welcomes the possibility to cover the black start service in a new setup with multiple grid users via providing groups. Febeliec takes note that for the awarding criteria, an addition on operational complexity was added, yet insists that this should not in itself become a barrier to entry for new participants as this would undermine the work done to introduce such concept for fostering and increasing competition, also more so in a future world with ever less large generation assets.

On the remuneration and as mentioned during the discussions on the design notes, Febeliec insists that it is important to maintain a balance between monthly ex post remunerations and sufficient checks that the service was available, as this service hopefully will hardly ever (or even better, never) be needed yet it is important that it nevertheless is available, both from a cost perspective but even more from an operational grid security perspective. This can include (smart) testing and other elements to validate such availability, with corresponding penalties such as remuneration reductions or even in excessive situations exclusion from the service.

Regarding the capital cost component, and as indicated before, Febeliec is not necessarily opposed to this component, insofar cheaper options for black-start come available because of it and these costs/investments are required to be able to provide the black-start service and would not have been made otherwise. As these costs can be quite high and the depreciation period can be (much) longer than the contracting period, Febeliec wonders how this element of different duration periods will be taken into account, to avoid that this could create market distortions and/or undue benefits for certain parties, at the detriment of costs for consumers. In any case, capital costs that can be strictly allocated for necessary investments for providing the black-start services shall never be remunerated double as these costs cannot be introduced again for any later contract period.

Febeliec appreciates the sufficiently long lead time (with an effective delivery as of 01/01/2027) in order to allow potential candidates to participate, especially also taking into account the new providing groups and competitive dialogue.