

FEEDBACK ELIA PRESENTATIONS TF 'ISR' OF 28.02.2014

Elia TF 'ISR' of 19.03.2014



COMMENTS AND SUGGESTIONS (I)

More information and explanation needed with regard to ...

- Methodology and criteria for technical trigger (including counter-balancing proces)
- Methodology and techno-economic evalution for the SR selection
- Eligibility criteria
- Selection and award criteria

Technical parameters

- Split between warming up in 'warming up without injection' and 'warming up with injection'
- Difficult to develop standardized technical parameters (depending on age, technology, fuel-type, ...): FEBEG recommends individual technical parameters in bilateral contracts
- Conditions must be set to only allow assets that could really fulfill SR obligations (to avoid administrative burden)

Notification process

- Pre-notification would increase availability and decrease costs of SR (dispatch personnel, standby modus, checks, ...)
- Notification process should be further detailed (Duration? How long will SR need to be standby? Notification for different phazes of warming up? ...)

Duration of SR contract

- In line with law that foresees SR of one to three years? How does this work with 5 month contracts (complexification)?
- Clauses to extend SR in case of risk of shortage in remaining 7 months?
- Can operator dispose of its assests outside period of 5 months?

March 20, 2014



COMMENTS AND SUGGESTIONS (II)

Availability

- 100 % availability with only tolerance for forced outages is not acceptable, especially as 'older' power plants are within scope of SR
- Elia should instead aim for 'high reliability' introducing an interactive procedure that allows certain maintenances, repairs, inspections, ...
- Need for proper remuneration of all costs as categories of power plants are obliged to participate
- Too severe penalties are unacceptable as risk exists that remuneration is determined by Royal Decree

Tests

- Number of tests and exact timing needs to be known before the start of the tendering
- A test cycle should include warming up, ramping up and period of steady state functioning at full load

Level playing field between SGR and SDR

- Like SGR, SDR should be 'out of market' as well, e.g. prohibition to decrease consumption as soon as notification is received; anyhow, only load that doesn't receive a price signal should be allowed to participate
- No fixed capacity obligation for SDR while setpoint for SGR
- Penalty regimes should be aligned
- Activation fee should be determining whether SGR or SDR is activated

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