

Febeliec answer to the Elia consultation on the Terms and Conditions for restoration service provider (RSP) and the Test Plan

Febeliec would like to thank Elia for this consultation on the Terms and Conditions for restoration service provider (RSP) and the Test Plan.

On the terms and conditions for restoration service providers, Febeliec wants to refer to its comments on the general conditions, which were the subject of a different public consultation yet are also relevant related to this consultation. Febeliec also wants to stress the importance of a good design, in order to foster sufficient competition while guaranteeing the availability of restoration services such as black start, and this all in order to limit the cost for the grid users. On the content of the document, Febeliec would like Elia to revise the definition of electrical zones, excluding the exhaustive list, in order to avoid to have to go through a complete revision of all documents containing this definition at any modification of the delineation of the electrical zones (this comment was also already made in the course of numerous other consultations).

On the test plan, Febeliec urges Elia to either publish the list of concerned SGUs or make sure that those SGUs are duly and correctly informed of their (exhaustive) obligations under this test plan. Febeliec understands from the document that currently no measures are included for defence service providers delivering demand response and demand response low frequency demand disconnection (LFDD), but asks that if any future version would contain any such measure, those will be preliminarily discussed with the grid users in the relevant working groups of the Elia Users' Group. With respect to article 5.2, Febeliec would like to see the text and title reviewed in order not to refer to demand response but rather load shedding, as the low frequency demand disconnection will not be a voluntary demand response service, but an obligatory, involuntary and non-remunerated load shedding. This would also make clear the distinction between article 5.1 and 5.2. On article 7.1, Febeliec would like Elia to bring clarity on the status of the CDSO, as the first alinea refers to each DSO whereas the third alinea also includes the CDSOs, leading to confusion on which obligations are imposed to the CDSOs. In this context, Febeliec would also like to comment the definition of DSO in article 8. Febeliec appreciates that Elia wants to make a distinction between public DSOs and CDSOs yet is not convinced, as also indicated numerous times before, that the proposed definition is compliant with the European context as described by the Clean Energy Package, where CDSOs are considered DSOs (albeit with potentially some derogations from the obligations for public DSOs if the Member States deems these necessary). Febeliec would thus like to invite Elia to always exhaustively mention both public DSOs and CDSOs if both are covered, which would also resolve the abovementioned issue related to article 7.1.