POSITION

Subject: FEBEG comments on ELIA's innovation plan
Date: 10 November 2023

Contact:
Telephone:
Mail:

FEBEG thanks CREG for having the opportunity to react to the *public consultation on the draft decision on the innovation plan of Elia for the regulatory period 2024-2027 in the context of the innovation incentive*[1].

Overall, we support innovation if it can truly bring long term benefits to society and if it is not conflicting with potential innovation coming from the market. We appreciate that the CREG is checking the proposals based on 5 important criteria, which are indeed critical to consider.

The inputs and suggestions of FEBEG are not confidential.

Detailed comments

Smart Technology for Assessing the Aging of Linear Assets

FEBEG can support the overall idea to improve the quality and lower the costs for the prediction of ageing of the Elia infrastructure (cables). We can only hope that improved prediction methodologies and precise techniques will help to avoid unnecessary costs in the future.

Automatic Visual Damage Detection

Similar to the previous topic/innovation we can see the potential benefits (lower costs) in the future that would come out of this project. It is also an additional positive element that this project will be developed in cooperation with other TSOs and partners, which will reduce the overall cost of the project and increase the spread of potential positive outcomes. FEBEG is generally speaking in favour of such collaborations, not all costs for innovation should be borne by Belgian grid users, since the benefits could (should) later in the process, also be shared across TSOs.

[1] https://www.creg.be/fr/consultations-publiques/prd658e/86

Dynamic Line Rating' (DLR) and HTLS

We understand that it is currently impossible to apply DLR techniques to HTLS lines. FEBEG can only regret that this is not possible today, and we indeed consider it useful to look into potential solutions.
We understand that the CREG does not fully support the project due to a lack of maturity. While we do have similar concerns as the CREG, we do ask to keep the project on the radar for potential future research, given the potential important long term benefits (less curtailment, more cross-border exchanges, …)

New 380 kV Tower Concept

FEBEG understands that the objective is to limit the visual impact of new towers/lines in the Boucle du Hainaut and Ventilus projects. While we support the objectives as such, we are not convinced of the innovative nature of the project. We understand that such new designs already exist (in France for example). Therefore, we consider it to be "normal business" for Elia to use the best available technology. We also consider that it is logic for Elia to install the new type of towers, since these offer multiple benefits, and are cheaper to install compared to the current "old" design.

PROOF: Project to optimise the planning of the offshore maintenance

FEBEG considers the project to be interesting and meet the necessary evolutions the grid will be facing, and we hope it can indeed reduce overall costs, not only for Elia but also for offshore wind developers and the market as a whole. Furthermore, we believe that the optimisation of planning can come to the benefits of congestion management.

Integration of Power Electronics

FEBEG is concerned that such project would open the door for Elia to start offering/providing services which could also be offered by the grid users / market parties.
This being said, we agree 100% with the statement that synchronous condensers and STATCOM are very expensive technologies and thus, should be avoided as much as possible.

Energize Connect

It is unclear which the identified use cases are. Without concrete examples, it seems premature to include this in an innovation incentive. In addition, FEBEG considers that similar data related projects and solutions can be and are being developed by market parties already today.

HVDC innovation centre

FEBEG understand that it is the wish of Elia to start a specific working group within Elia on HVDC topics. While we understand that the CREG is not supporting (at this stage) the project, we consider it to be interesting and relevant to consider in the future, when concerns of the CREG are taken into consideration.

Subsea Pin Pointing

We understand that the projects aims to improve the maintenance and control of the sub-sea cables infrastructure. FEBEG can agree with the analysis of the CREG and considers the project to be interesting.

Gridshield: project linked to cybersecurity

FEBEG understands that the project aims to test certain risks (IT related) by means of a digital twin of the Elia grid. While we see that the project can offer interesting insights, we also support the comments and concerns of the CREG regarding the required measures to ensure that the project can be executed in all safety and without risks of leaking important information and consideration with privacy concerns and others.

High Performance Computing - HPC

FEBEG understands that there is a need for advanced computers / algorithms to cope with increasing complexity. However, we do not understand why this should be supported via a specific innovation budget. All market parties are confronted with increasing complexity and are obliged to invest in the required IT infrastructure. We see limited innovation in the project and consider it a normal task of Elia to invest in state of the art IT technology given the important, crucial and central role of Elia in the electricity market.

Conclusion

We note that the CREG will support the following 8 projects: *Smart Technology for Assessing Aging of Linear Assets ; Automatic Visual Damage Detection ; New 380 kV Tower Concept ; PROOF ; Integration of Power Electronics (INPOWEL) ; Subsea Pin Pointing ; GridShield ; High Performance Computing.*

As FEBEG we would like to prioritize the following*: Smart Technology for Aging Assessment, Visual Damage Detection, PROOF, Gridshield and Subsea Pin Pointing*.

We consider other projects (*new 380 kV towers, HPC, Energize connect, power electronics*) to be less interesting, not clearly innovative, or as a normal task of the TSO.

We also consider the DLR/HTLS and HVDC topics to be interesting for future work.