

Documenten Flexibiliteit
21/04/2023 - 02/06/2023

Type of comments
E
T
G

Editorial
Technical
General

company	file	section	type	text proposal	comment
				<p>Het voorstel is werkzaam voor aFRR voor stationaire batterij systemen, die permanent aan het net gekoppeld zijn.</p> <p>Voor V2G toepassing met de batterijen van elektrische auto's, die individueel niet permanent aan het net gekoppeld zijn, maar die collectief een minimum gekoppelde capaciteit en regelmogen kunnen garanderen is een aanpassing van de methode nodig.</p> <p>Het beheerssysteem van de (bidirectionele) DC laadpalen kan het aFRR vermogenspunt verdelen over de gekoppelde laadpalen, kan de geleverde regelvermogens door sturen naar de BRP/TSO, en kan de regelvermogens per EAN doorsturen naar de DSO.</p> <p>Decentrale communicatie met TSO dient vervangen te worden door centrale communicatie met de beheerssystemen van de (bidirectionele) DC laadpalen.</p>	
Movanis BV	Market_Guide_FLEX_v1.1_markup.pdf		0 G		Movanis heeft een dergelijke test installatie werkzaam op haar bedrijfsterrein en kan hiermee aantonen hoe V2G/V1G kan ingezet worden voor aFRR mits aanpassing van het huidige voorstel.
Anonymous, but known to Synergrid	NL_FSP_DSO_model overeenkomst_mar_kup.pdf		0 T		Goede middag, ik heb al meermaals de vraag gesteld aan Synergrid en Fluvius hoe het staat met onderzoek en lastenboek waar led verlichtings armaturen voor openbare verlichting op zonne-energie hybrid moeten voldoen. wij hebben 2 jaar testen uitgevoerd met een zeer positief resultaat en 90 % energie besparing op jaarbasis. Laboratorium testen zijn ook in ons bezit.
Flux50	Market_Guide_FLEX_v1.1_markup.pdf		2 E		Figure 1 do not include the billing process.
Flux50	Market_Guide_FLEX_v1.1_markup.pdf	3.1.	G		mFRR for LV not in scope? See also in Dienstencatalogoog. This is not clear in other parts of the document. Flexibility LV only in FCR and aFRR is quite difficult to understand!
Flux50	Market_Guide_FLEX_v1.1_markup.pdf	4.1.	G		The Market Operator is not an explained role in the previous section about market roles.
Flux50	Market_Guide_FLEX_v1.1_markup.pdf	4.2.2.	G		The role of the DGU is not clear in the processes. The relation DGU/FSP is not described in the guide. The E2E process has to start with the DGU and not with the FSP.
Flux50	Market_Guide_FLEX_v1.1_markup.pdf	4.2.3.	E	The end result of the NFS will be communicated by the DSO to the DGU or the FSP on his behalf. See process flow.	
Flux50	Market_Guide_FLEX_v1.1_markup.pdf	4.2.4.	G		For LV, the identification used will always be the identification of the delivery point linked with the headmeter of the connection point. As a result, for LV only 1 SDP-Flex can be registered per product/FSP and it will be at headpoint level. -> Please explain this restriction. See PDG 'Regelbare Toepassingen' and the possibility of submeters. Why only a process with the FSP? and not the DGU?

Flux50	Market_Guide_FLEX_v1.1_markup.pdf	4.2.5.	G		Is here a difference for MV and LV? For LV only the headmeter so no need to install a specific meter??? Why the DGU and not the FSP?
Flux50	Market_Guide_FLEX_v1.1_markup.pdf	4.2.6.	G		The DSO is not in the process flow but has a task in 'onboard endpoint'.
Flux50	Market_Guide_FLEX_v1.1_markup.pdf	4.3.2.	G		Second processflow not clear: start new service.
Flux50	Market_Guide_FLEX_v1.1_markup.pdf		8 G		The MV and LV tariffs currently do not take into account the provision of flexibility. Tariffs should not be charged for the flexibility supplies that support the network.
Flux50	c8-01-nl-markup.pdf		3 G		In het Vlaamse en het Waalse Gewest, wordt de kwalificatieaanvraag ingediend door de DNG. Deze mag eveneens een derde partij mandateren. -> De rol van de netgebruiker en de FSP is in de documenten zeer verwarrend. En wat is dan de relatie met de netbeheerder? De netgebruiker is geen specialist in deze processen: wat moet er juist gebeuren als de DNG zijn flexibiliteit wil valoriseren? Ook de voorwaarden van de kwalificatieaanvraag zijn zeer complex: hoe kan de DNG ontzorgd worden?
Flux50	c8-01-nl-markup.pdf	Bijlage	E	In een noodsituatie, als de operationele veiligheid of de betrouwbaarheid van het elektriciteitsdistributienet in acuut gevaar is of dreigt te komen, kan de DNB alle uitzonderlijke en tijdelijke maatregelen te nemen die hij nodig acht: 'te' weglaten.	
Flux50	NL_FSP_DSO_modelovereenkomst_markup.pdf		0 G		Dienstencatalog: mFRR: Enkel de SDP-F's aangesloten op het distributienet met spanning > 1kV mogen worden toegevoegd aan de Pool van de FSP, tenzij de toepasselijke regelgeving dit anders bepaalt. Dit is niet duidelijk in de andere documenten. Waar kan de flexibiliteit LV dan wel terecht?
					Market Guide Flexibility ODE supports the expansion of aFRR to low voltage, this is a first step in the transition to a more flexible energy system that is getting ready for the integration of more renewable energy.
					One Service Delivery Point per access point on low voltage ODE regrets that the current framework means that only one asset can participate in aFRR on low voltage. This is not a future-proof framework and should be adjusted as soon as possible. It does not take into account the fact that electric vehicles and (home) batteries that will participate in these services will be aggregated by different parties. As a result, the possibilities that electric vehicles, heat pumps, photovoltaics, water heaters and (home) batteries can offer will not be fully exploited and it would possibly hinder the participation of these assets. This stresses the urgency to proceed with the upcoming framework 'multiple supply contracts for adjustable appliances'. ODE would also like to see a timeline included within which multiple assets from different operators (aggregators) on the same access point are facilitated.
					Digital meter with SMR3 obligation ODE understands that a digital meter is obligatory for participation in aFRR but wants to point out that this obligation might reduce initial participation on low voltage due to the financial benefits net metering has for prosumers and their right to refuse installation of a digital meters (until 2025). Also, the right to keep the analog meter for clients with exclusive night meters until 2028, typically for accumulation heating, means that these assets will most likely not soon take part in aFRR. SMR3 should be made the standard setting for all customers with digital meters and quarter hour values should be made available in the MijnFluvius platform automatically for all digital meters, no opt-in required. This creates more awareness about usage patterns and by that, more implicit reaction to price signals for people with variable contracts. It also creates opportunities for aggregators and flexibility service providers to analyze offtake and injection profiles, which is necessary to assess whether there is a business case for flexibility services. This will increase participation in aFRR and other flexibility products. If the increase in data flows is a problem, standard activation of SMR3 and quarter hour data in MijnFluvius could first be implemented in the commercial market segment since the cost benefit analysis from 2017 shows there is a lot of potential for flexibility. Further, the quarter hour values should be used in the allocation volumes.
ODE Vlaanderen	Market_Guide_FLEX_v1.1_markup.pdf		0 G		Congestion zones Regarding the classification of congested zones, ODE pleads for a much more dynamic process and much shorter evaluation periods to assess the need for restrictions on flexibility as close to real-time as possible. Good and extensive coordination between grid operators, further digitalization and modernization of grid infrastructure can reduce the need for restrictions to a minimum. The current proposal will most probably limit the activation of flexibility much more than necessary and therefore reduce the potential of available flexible assets, thereby reducing the market liquidity and potentially increasing the overall cost of flexibility.
					Furthermore, voltage information could be made available in the MijnFluvius portal since this is already measured by the digital meter. This would provide the offtaker with data that can help in designing and operating its' installations and usage patterns, thereby reducing local congestion risks. On top of that, the grid operator would get a very detailed status of the distribution grid and possible congestion risks. The grid operator would also get a better view on the distribution of single-phase connections on the different phases.
ODE Vlaanderen	Market_Guide_FLEX_v1.1_markup.pdf		0 G		Capacity maps should be made publicly available as soon as possible to provide transparency on the available capacity and it should be made available in as detailed as possible form. ODE understands that this is a continuously improving process but stresses that the continuously increasing level of detail in the congestion maps in parallel with further digitalization of the distribution grid should also be reflected in the capacity maps.

Synergrid regulation C8/01
Network Flex Study

ODE supports the exemption of network flex studies on low voltage for connections <5 kVA (single phase) and <10 kVA (three phase). The 10kVA limit for residential customers might even be too low, considering the electrification of heating and mobility. This limit should best be increased in the near future. The entry barriers for residential and low voltage should be kept as low as possible and these connections have the right to fully use their connection capacity.

Congestion zones

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Executive summary:

Centrica thanks Synergrid for the opportunity to provide comments on the amended flexibility documents (C8/01, FSP-DSO contract, flexibility market guide). We recognise the significant effort from Synergrid and would like to share the following comments:

- We welcome Synergrid's commitment to unlock low-voltage flexibility.
- We ask Syngrid to clarify measurement requirements & harmonise them across regions.
- We urge the authorities to reform metering specifications to drive energy innovation.
- We have strong concerns about the lack of provisions for aggregation.
- We invite Synergrid to develop a framework for an efficient treatment of low-voltage asset requests.

- We see merit in a more stakeholder friendly consultation procedure.

Centrica welcomes Synergrid's commitment to unlock low-voltage flexibility

As of early 2024, and subject to the necessary regulatory evolutions, Centrica considers onboarding several thousand low-voltage connected delivery points onto the aFRR service as a proof of concept. Upon a successful go-live, we anticipate a substantial increase in the number of delivery points in the course of the year.

Residential flexibility is crucial for a secure, sustainable, and cost-effective energy transition in Belgium. To achieve this, we need to access flexible assets at lower voltage levels and establish suitable metering options and an efficient transfer of energy framework.

We are pleased with the introduction of the 'fast-track' for aFRR low-voltage, as it represents the first step in unlocking new services for low-voltage connected assets. However, we must quickly implement a long-term solution that addresses the remaining limitations concerning the transfer of energy, local gateway, individualized data, metering requirements, and more.

By overcoming these challenges, we can fully harness the potential of residential flexibility and drive the energy transition forward. It is essential to act swiftly and decisively based on the lessons learned from the initial phase. Centrica asks Syngrid to clarify measurement requirements & harmonise them across regions

We have concerns regarding the mandatory requirement of SMR3 enabled metering in Flanders for the fast-track aFRR LV in 2023, while similar requirements are expected later in 2024 for Brussels and Wallonia. It is also unclear why the SMR3 requirement applies when an explicit opt-out agreement is in place.

To ensure a fair playing field between regions and avoid unnecessary implementation challenges for providers, we urge Synergrid to postpone additional measurement requirements until harmonization is achieved across all regions. Additionally, we recommend the inclusion of derogation schemes that allow specific arrangements between BSP/FSP and BRP/suppliers to bypass these requirements when they are deemed unnecessary.

By harmonising measurement requirements and providing flexibility in derogation, Synergrid can prevent regional disparities and streamline the implementation process for all stakeholders involved.

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Centrica urges the authorities to reform metering specifications to drive energy innovation

The stringent metering specifications imposed by the existing regulatory framework are hindering the development of residential flexibility. These requirements, designed for regular electricity supply, are disproportionate when measuring lower levels of energy in balancing reserves or capacity mechanisms. They result in high investment costs and lengthy lead times, discouraging providers from pursuing residential flexibility at the low-voltage level.

The current technical requirements for private meters require a power meter with an accuracy class of 0.25. The minimum cost of such a meter exceeds 250 EUR (excluding installation costs), which is a prohibitive additional cost for each residential installation. A multi-year payback period would be required to cover just the metering equipment for EV chargers, hot water heating,... These devices are capable to deliver the other technical requirements of the aFRR service. Existing installations would be excluded due to the economics and complexity of revisits to install metering equipment (the cost of an installer quickly exceeds 150 EUR).

To address this issue, we call upon all stakeholders involved - DSOs, Elia, regulators, and providers - to explore broader metering solutions at both the distribution and transmission levels, as well as within different reserves. One potential solution is the development of a new code of practice specifically tailored to metering flexibility services "behind-the-meter".

We can draw inspiration from the UK's recent P375 code reform and CoP11 accuracy standard review, which introduced different accuracy classes for different use cases. This approach unlocks the full potential of residential flexibility, encompassing small-scale renewable generation, battery storage, demand-side response, and electric vehicle chargepoints.

CoP11 introduces different metering accuracy requirements based on the size of the asset and allows for the use of "asset meters" (which are embedded in the device). The table below illustrates the range of accuracy of embedded meters that Centrica has encountered with various manufacturers and device types.

- Residential batteries: 3-6% accuracy range; Based on tests with devices from 8 manufacturers. In Flanders, 33.258 households installed a battery in 2022 (conservatively this equates to 132 MW of installed capacity).

- EV charge points: 1-5% accuracy range; Based on tests with 5 device manufacturers. Power metering is typically only available once per minute (not every second). By the end of 2023, it's projected there will be 125.000 fully electric EVs in BE.

- Heat pumps: 5-25% accuracy range; Based on tests with devices from 4 manufacturers.

- Electric heating (space heating & boilers): 2-7% accuracy range; Based on tests with 5 manufacturers.

By embracing alternative metering options, we can remove the barriers that hinder the growth of residential flexibility and unlock its benefits for the energy system. Centrica has strong concerns about the lack of provisions for aggregation

The current proposal lacks provisions for aggregated delivery of flexibility from low-voltage connected assets. Individual participation in aFRR is expected, disregarding established concepts like 'virtual' delivery points in FCR. We fail to comprehend the rationale behind excluding proven solutions at this stage.

We strongly urge Synergrid to embrace a regulatory framework that supports aggregation right from the start. By doing so, we can unlock the full potential of low-voltage flexibility and maximize its benefits for the energy system. Centrica invites Synergrid to develop a framework for an efficient treatment of low-voltage asset requests

The lack of a specified Service Level Agreement (SLA) for onboarding low-voltage assets in aFRR is concerning. We understand the limitations of DSO resources and the uncertainty surrounding the number of market participants utilizing low-voltage flexibility. However, we firmly believe that in addition to the mentioned 'best effort' commitment, there should be an explicit reference to a minimum SLA in the market rules.

Furthermore, it is crucial to outline a clear process for queue management in case of bottlenecks. This ensures transparency and fairness in accessing and utilizing low-voltage flexibility.

We call upon Synergrid to address these issues and establish a comprehensive framework that guarantees timely and efficient treatment of requests from low-voltage assets.

Centrica sees merit in a more stakeholder friendly consultation procedure

FEBELIEC and ODE have raised valid concerns about the current consultation procedure. The response form hinders meaningful feedback, and the consultation documents lack flexibility for amendments and collaboration. We invite Synergrid to consider the acceptance of fully formulated responses and the provision of editable consultation documents (.doc, .xls, .odt, etc.) in order to enhance the consultation process and ensure industry feedback is heard.

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Market
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Figures
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General
Please clarify the figures

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Market
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3.1.
Processes
of
flexibility
products
General
Footnote 16 & 17: aFRR is today only via opt-out or passthrough configuration

FEBEG
Market
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3.1.
Processes
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General
Footnote 16 & 17: aFRR is today only via opt-out or passthrough configuration

How to consider when a gateway endpoint is able to steer multiple assets (PV-systems & battery)? Is this 1 SDP-F or multiple ones?

In case of 'Opt out' there is a correction of the perimeter of the BRPFsp with the requested volume in case of mFRR or aFRR but not ID/DA. Footnote 16 & 17 will need to be adjusted accordingly.

aFRR via opt-out agreement is acceptable as a solution to start with but the model needs to evolve towards an individual correction of the consumption in due time. With an increasing number of delivery points valorising flexibility and thus increasing volume, the impact on the supplier and BRP needs to be neutralised correctly. ToE (incl. opt out agreement) is not a sustainable solution to settle the impact on the supplier and associated BRPsource.

FEPEG	Market Guide Flex	3.2. Metering requirements of flexibility products	General	For the regulated meter (non-private), we can make a further distinction between: Fully regulated: the meter is owned, installed and maintained by the DSO, and the DSO is responsible for all metering aspects. Regulated: Same as fully regulated, except that the meter is installed and maintained by a 3rd party. Semi-regulated: The 3rd party is also owner of the meter. AND FOOTNOTE: 19 Today only 3rd party submeter.	The definitions used in the text (fully regulated, regulated and semi-regulated) are not used in a consistent manner in the Table (Table 4). Where references are made to submeter and regulated headmeters (while a submeter could be regulated or semi-regulated, which is not clarified). in addition, in the footnote a 3rd party submeter is mentioned, but it is not clear if this is a regulated or semi-regulated 3rd party submeter.
FEPEG	Market Guide Flex	4.2.3. Net Flex Study	General	Exception LV: For region Flanders, as stated in TRDE 2.3.26: in case of LV, flexible power will not be restricted when it is limited to 5 kVA for a mono phase connection or 10 kVA for three phase connection.	FEPEG regrets the different approach in the various regions in general, in this case, there is an exception in FL and not in the other regions, which is burdensome and complicated for market parties to manage. FEPEG regrets that within Bxl & Wal for each aFRR connection point we need to request a NFS, this will hinder market development.
FEPEG	Market Guide Flex	4.2.3. Net Flex Study - Process Description / Process Flow	Editorial	Flow: 1. Request Net Flex Study: The DGU sends an application for a NFS to the DSO. This application consists of the NFS request form Steering of the process (general process agreements): It's possible that the DSO re-evaluates the prequalified power because of increased risk in that zone 12 months after this constatation the prequalified power can be reduced by the DSO (exception for certain multi-year contracts)	The DGU (or the FSP on his behalf) sends a request for a Net Flex Study
FEPEG	Market Guide Flex	4.2.3. Net Flex Study	General	4.2.5. Set up ex post data communication	FEPEG cannot accept a uni-lateral revision of the contract. In a commercial environment, we cannot offer contracts/solutions to consumers, if these can be cancelled in the short term by the DSO.
FEPEG	Market Guide Flex	4.3.1. Sign FSP-FRP contract	Editorial	Process description. Starting signal: The DGU requests the DSO to install a specific meter	Process description Starting signal: The DGU (or the FSP on his behalf) requests the DSO to install a specific meter
FEPEG	Market Guide Flex	4.3.1. Sign FSP-FRP contract	Editorial	4.3.1. ToE in DA/ID market	There is no FSP-FRP contract for ToE in DA/ID. ToE in DA/ID should be removed to be also in lign with the table on p. 22.
FEPEG	Market Guide Flex	4.3.4. Stop service	General	A service can also be stopped on initiative of the DSO (see Article 5 of FSP-DSO contract): o in case the requirements of FSP-DSO contract are no longer fulfilled o in case the functioning of the grid is jeopardized by the flexibility delivery (temporary stop)	FEPEG asks for a robust legal framework to protect the FSP in case of unilateral contract "service stop" termination (of a FSP - Grid Users contract) by the DSO, when this termination was only due to the DSO and not linked to any action or fault committed by the FSP. The current formulation is very general and not legally robust.
FEPEG	Market Guide Flex	6.2.2. Real-Time Data Communication		Exceptions: The BSP can send data in a throttled way when the communication is down and through manual process if that does not work.	FEPEG cannot accept that, in case an FSP can't keep up with data feed, that it is the BSP that is penalised and obliged to start "manually" (throttled or manual process) sending the data over. There should be financial compensation for this and a limitation in time and scope. FSPs with bad reputation/handling should be excluded from the market. Is it not possible to use SLA's to avoid that this happens too often?
FEPEG	Market Guide Flex	7.1.2. BRP perimeter correction for Transfer of Energy	Editorial	7.1.2. BRP perimeter correction	Change title to '7.1.2. BRP perimeter correction' to align with text in table on p.23. Furthermore, it is not correct to link BRP perimeter correction only to 'Transfer of Energy'

				<p>This correction is done by the TSO based on the Energy Delivered and Requested volumes.</p> <p>In case of ToE, the correction of the BRPsource is done at the AP level (with Energy Delivered volume) and of the BRPfsp with the difference between the Requested and the Delivered volume.</p> <p>In case of opt out, there is a correction of the BRPfsp with the Requested volume.</p>	The correction in this step is not limited to the BRPsource.
FEBEG	Market Guide Flex	7.1.2. BRP perimeter correction for Transfer of Energy	Technical		
FEBEG	Market Guide Flex	8. Billing	General	<p>However, if a specific meter (not used in the supply market) is placed by the DSO for flexibility purposes, DSOs could charge a recurrent metering fee to the FSP (like it is the case for energy suppliers).</p>	Will the DSO then also guarantee the data flow for billing purposes & audit proof for flexibility?
FEBEG	Market Guide Flex	8. Billing	General	<p>According to the FSP-DSO contract, costs can be invoiced to the FSP, only when the allocation of these costs is provided for in the distribution network tariffs approved by the regulator. The current costs for the platforms, data management, support ... are spread across all DGU's through the gridfees, but this could evolve in the future</p>	FEBEG understands that costs are currently socialised. However, this is not a sustainable approach in the long term. The objective should be to align the costs incurred to the grid users which are causing the costs (for implementation, follow up, etc...). A correct cost allocation is essential in the view of FEBEG, in principle, but also from a societal point of view.
FEBEG	Market Guide Flex	8. Billing	General		
FEBEG	C8-01	Stap 2: NFS-studie	General	<p>"The color assigned to the zone takes into account the analysis of the impact of the flexibility both on the distribution grid and on the transmission grid and is currently valid for an extended period of time. In order to fully deploy market flexibility, work must be done toward a smart, dynamic and interactive process."</p>	FEBEG understands the need - due to the simultaneity effect - to set limits on the use of market flexibility through an NFS without compromising the security and stability of the distribution network. FEBEG also appreciates the continuous improvements to the NFS process and therefore encourages distribution operators to continue working towards a smart, dynamic, interactive and transparent process so as to minimize the valorization of market flexibility. Instead of pre-emptively capping or prohibiting market flexibility for a prolonged period of time, this new process should be based on an iterative exchange of information (from prediction to real-time information) between grid operators (risk of congestion, etc.) and flexibility service providers (available flexibility, planned flexibility actions, etc.) so that grid operators can manage congestion more in real-time by filtering out and canceling closer to real-time activations of market flexibility.
FEBEG	C8-01	Stap 3: resultaat van de NFS-studie: impact op de kwalificatie van de aansluitingpunten	General	<p>However, if in the primary market a regulator-approved multi-year contract for a specific Flexibility Service was entered into with the FRP, the result of the NFS remains valid until the first anniversary of the pivot date following the termination, modification or trading of this multi-year contract.</p> <p>The DSO's headmeter must be quarterly metered and the quarterly values must be used in the allocation.</p>	<p>For FEBEG, the proposed change "<i>provided the full prequalified capability was contracted</i>" should be deleted for 2 reasons:</p> <ol style="list-style-type: none"> 1) A change of rules of the game during the term of a multi-year contract is not acceptable. This undermines the investment decision and can have major financial consequences. After all, penalties are charged when the flexibility cannot be delivered as foreseen in the multi-year contract. 2) The interpretation of "<i>the full prequalified capacity was contracted</i>" is unclear. Per flexibility service in the CRM a reduction factor applies or an opt out (=not offered volume) is possible that only allows to contract x% of the prequalified power. The allowed power was contracted in full but this is not the full prequalified power."
FEBEG	FSP-DSO Contract	Bijlage 1 - dienstencatalogus	Technical		For mFRR, SDR, ToE in DA/ID: The DNB's head meter should be quarter-metered and the quarter-meter values should be used in the allocation. This last part of the sentence is missing and should be added throughout.