

Type of comments

E Editorial  
 T Technical  
 G General

Acceptance code

A accepted  
 P partially accepted  
 N noted  
 R Refused

company	file	section	type	text proposal	comment	synergrid answer	acceptance code
Movanis BV	Market_Guide_FL_EX_v1.1_markup.pdf		0 G	Het voorstel is werkzaam voor aFRR voor stationaire batterij systemen, die permanent aan het net gekoppeld zijn. 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. Het beheerssysteem van de ( bidirectionele) DC laadpalen kan het aFFr 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. Decentrale communicatie met TSO dient vervangen te worden door centrale communicatie met de beheerssystemen van de (bidirectionele) DC laadpalen.	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.	Thank you for the remark and information. Synergrid and its members are interested in the results of the pilot in question,. If these results could be provided to the SO's, they might prove useful for future developments.	N
Anonymous, name known to the SO's	NL_FSP_DSO_modelovereenkomst_markup.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.	Thank you for this remark. After clarification from the remarking party, this remark is however out of scope, as it pertains to public lighting, and not not Flexibility. The person in question was redirected to the correct functional Synergrid mailbox relating to his question.	N
Flux50	Market_Guide_FL_EX_v1.1_markup.		2 E		Figure 1 do not include the billing process.	Correct, the figure does not include the billing process because there are currently no billing processes between FSP and DSO (see also chapter 8).	R
Flux50	Market_Guide_FL_EX_v1.1_markup.	3.1.	G		mFRR for LV not in scope? See also in Dienstencatalog. This is not clear in other parts of the document. Flexibility LV only in FCR and aFRR is quite difficult to understand!	Correct. As discussed during the stakeholdermeeting, and noted on the consultation page, the scope of this document release is limited to aFRR on LV	N
Flux50	Market_Guide_FL_EX_v1.1_	4.1.	G		The Market Operator is not an explained role in the previous section about market roles.	Thank you for this remark. We adapted the document and changed Market Operator into FRP.	A

Flux50	Market_ 4.2.2. Guide_FL EX_v1.1_markup.pdf	G		The role of the DGU is not clear in the processes. The relation DGU/FSP is not discribed in the guide. The E2E process has to start with the DGU and not with the FSP.		Info on the DGU and its relation/role are shown in 2.3.1 Market roles, 2.3.2.2 Flexibility Service Provider and 2.3.3 Contracts between market parties.  To further clarify its role, we added following extra info in the document: - add to definition of Distribution Grid user: "... If the DGU wants to participate in the Flex market, he can: 1. Pick up the role of FSP for his own connection points, or 2. Give a mandate to a FSP who will then represent the DGU in the Flex market."  - add to 2.3.2.2 FSP: "If the DGU doesn't want to work with a FSP, the DGU can - for its own connection points - also fulfill the role of FSP. If a contract is signed between FSP and DGU, the FSP will represent the DGU in the Flex market for its connection points."  Regarding the E2E process: The DSO is not involved in setting up a contractual relationship between DGU and FSP. As such, the process is not included in the MG Flex document.
Flux50	Market_ 4.2.3. Guide_FL EX_v1.1_markup.	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.		Both for CCC as NFS, we changed DGU by DGU or FSP at the top of the process flow to make it more consistent with the described process steps.
Flux50	Market_ 4.2.4. Guide_FL EX_v1.1_markup.pdf	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.-&gt; Please explain this restriction. See PDG 'Regelbare Toepassingen' and the possibility of submeters. Why only a process with the FSP? and not the DGU?		The restriction of 1 service delivery point flexibility per access point is chosen to allow for an earlier introduction of aFRR for LV. As pointed out in the reaction, a framework for multiple SDP per headpoint is in preparation. This is also an evolution which is included in the new EMD reform discussions. We expect further legal and regulatory specifications will follow, after which the framework for multiple SDP (and submetering) may be extended for aFRR as well.
Flux50	Market_ 4.2.5. Guide_FL EX_v1.1_markup.pdf	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?		- If the product requires ex-post communication, a separate meter might need to be installed to comply to the metering requirements of the product. For LV, this meter will be linked to the headpoint. No specific meter for LV is currently needed if the metering data is already sent via the headmeter in accordance with the metering requirements (eg. via digital meter). - The request is done by the DGU because the meter will be installed by the DSO on the premises of the DGU and the DGU is the responsible party of the connection point.
Flux50	Market_ 4.2.6. Guide_FL EX_v1.1_markup.	G		The DSO is not in the process flow but has a task in 'onboard endpoint'.		We would like to thank you for the remark, the process flow has been adjusted.
Flux50	Market_ 4.3.2. Guide_FL EX_v1.1_markup.pdf	G		Second processflow not clear: start new service.		Technical issue in the document: the second process flow was removed in the document, but was for some reason still shown. The new document will show only 1 process flow.
Flux50	Market_ Guide_FL EX_v1.1_markup.	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.		This remark is out of scope: tariffs fall under the competence of the regulators
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. -&gt; 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?		More clarity is given in the MG Flex document (see also answer on row 28).

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.		We adapted the text as it is proposed in the comment.	A
Flux50	NL_FSP_DSO_modeloverenkomst_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?	In MG Flex, article 3.1 contains a table that shows which products are available for the flexibility of LV customers and is also mentioned in article 10. For the next developments on LV Flexibility, we refer to the roadman Flex.	N
ODE Vlaanderen	Market_Guide_FL_EX_v1.1_markup.pdf		0	G	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.	For the restriction to 1 service delivery point for flexibility per access point, we refer to our response to the comment on line 30. With respect to the use of quarter hour values we refer to the upcoming legal requirement in Flanders to read all quarter hour values from digital electricity meters of active consumers from 01/01/2025 and from all digital electricity meters from 01/01/2026. These values will be available in MijnFluvius, subject to prior consent of the grid user.	N
ODE Vlaanderen	Market_Guide_FL_EX_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.  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.	The System Operators thank ODE for their feedback. However, the points raised in this remark are out of scope for this document release, as the scope is enabling aFRR on LV. Congestions zones and related matters will be handled independantly by each Grid operator.	N
ODE Vlaanderen	c8-01-nl-markup.pdf		0	G	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 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.  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.	The System Operators thank ODE for their feedback. However, the points raised in this remark are out of scope for this document release, as the scope is enabling aFRR on LV. Congestions zones and related matters will be handled independantly by each Grid operator.	N

Centrica	FR_FSP_ GRD_mo dele_de_ contrat_ markup. pdf	0 G	<p>Executive summary:</p> <p>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:</p> <ul style="list-style-type: none"> <li>- We welcome Synergrid's commitment to unlock low-voltage flexibility.</li> <li>- We ask Syngrid to clarify measurement requirements &amp; harmonise them across regions.</li> <li>- We urge the authorities to reform metering specifications to drive energy innovation.</li> <li>- We have strong concerns about the lack of provisions for aggregation.</li> <li>- We invite Synergrid to develop a framework for an efficient treatment of low-voltage asset requests.</li> <li>- We see merit in a more stakeholder friendly consultation procedure.</li> </ul> <p>Centrica welcomes Synergrid's commitment to unlock low-voltage flexibility</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	The System Operators welcome the feedback from Centrica.	N
Centrica	FR_FSP_ GRD_mo dele_de_ contrat_ markup. pdf	0 G	<p>Centrica asks Syngrid to clarify measurement requirements &amp; harmonise them across regions</p> <p>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.</p> <p>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.</p> <p>By harmonising measurement requirements and providing flexibility in derogation, Synergrid can prevent regional disparities and streamline the implementation process for all stakeholders involved.</p>	The System Operators welcome the feedback from Centrica.	N
Centrica	FR_FSP_ GRD_mo dele_de_ contrat_ markup. pdf	0 G	<p>Centrica asks Syngrid to clarify measurement requirements &amp; harmonise them across regions</p> <p>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.</p> <p>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.</p> <p>By harmonising measurement requirements and providing flexibility in derogation, Synergrid can prevent regional disparities and streamline the implementation process for all stakeholders involved.</p>	<p>An opt-out agreement means that the FSP of a grid user and the BRP/Supplier of this grid user negotiate bilaterally the impacts of the FSP's activations on this Supplier and this BRP. However, the activation of a grid user without SMR3 will have an impact not only on the Supplier and BRP of this customer but on all Suppliers and BRPs in the same distribution network as in the case of distribution network users without SMR3, the DSO concerned will take quarter-hourly measurements at the infeed points of its network (= points of interconnection with the Elia network) and deduce by quarter-hour (after subtracting the measurements of its SMR3 distribution network users) a volume to be allocated to each BRP active behind its infeed point according to a distribution key. An opt-out agreement signed with your customers' Suppliers and BRPs is therefore insufficient and will relate to incorrect volumes.</p> <p>Based on the above, we consider that SMR3 is a firm requirement in all regions. However considering that SMR3 is not deployed yet in all regions and to not temporarily block participation, an exception is provided for those regions.</p>	R

Centrica	FR_FSP_ GRD_mo dele_de_ contrat_ markup. pdf	0	G		<p>Centrica urges the authorities to reform metering specifications to drive energy innovation</p> <p>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.</p> <p>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).</p> <p>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".</p> <p>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.</p> <p>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.</p> <ul style="list-style-type: none"> <li>- 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).</li> <li>- 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.</li> <li>- Heat pumps: 5-25% accuracy range; Based on tests with devices from 4 manufacturers.</li> </ul>	<p>The SO's understand the concern voiced by Centrica, and the SO's are evaluating whether an adaptation of metering requirements for some flexibility products are possible within the current legal framework, and whether they are feasible and desirable. Should these talks result in adaptation of any metering requirements, these will be publicly consulted.</p> <p>As far as this consultation is concerned however, this comment is out of scope, as the metering requirements are described in the Synergrid prescription C8-06, which was not part of the current consultation. Lastly, the SO's would like to point out that for the case of aFRR LV, the Synergrid prescription C8-06 and the MID apply, and not the accuracy of 0.25 as mentioned in the comment.</p>	R
Centrica	FR_FSP_ GRD_mo dele_de_ contrat_ markup. pdf	0	G		<p>Centrica has strong concerns about the lack of provisions for aggregation</p> <p>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.</p> <p>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.</p>	<p>As stated in article 10 of the MG Flex document, Virtual Delivery Points are under evaluation as a solution to aggregate delivery of flexibility. When formalised, the design and formalities will be described in the respective FSP contracts and consulted with the market (eg. Terms and Conditions of aFRR).</p>	R
Centrica	FR_FSP_ GRD_mo dele_de_ contrat_ markup. pdf	0	G		<p>Centrica invites Synergrid to develop a framework for an efficient treatment of low-voltage asset requests</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>For the opening of this Fast Track aFRR, Best Effort principles will be used. However, efforts will also be made to automate the onboarding process. Requests will be treated based on the "first in, first out" principles, and account managers will be on hand to clarify the status of any requests.</p>	N
Centrica	FR_FSP_ GRD_mo dele_de_ contrat_ markup. pdf	0	G		<p>Centrica sees merit in a more stakeholder friendly consultation procedure</p> <p>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.</p>	<p>Based on the comments regarding the consultation procedure received during the stakeholder meeting, the consultation procedure was adapted in that responding via filling out an Excel-sheet was also made possible. In addition, comments and feedback received via word or pdf were also taken into account. The SO's and Synergrid also note that consulting based on pdf-documents is a common practice, as evidenced by the consultations carried out by the various regulators.</p>	N
FEPEG	Market Guide Flex	Figures 2,3,4	Gen eral	Please clarify the figures	<p>How to consider when a gateway endpoint is able to steer multiple assets (PV-systems &amp; battery)? Is this 1 SDP-F or multiple ones?</p>	<p>See also info on row 30 - same topic.</p> <p>A gateway endpoint can only be linked to 1 SDP-F, even if it steers multiple assets. If the FSP wants to offer the assets separately in the Flex market, a separate gateway endpoint is needed. In that way, the metered volumes can be directly linked with the steered asset and there is no interference of 1 asset on the metering data of the other one.</p> <p>For LV, this is considered as a future evolution.</p>	N

FEBEG	Market Guide Flex	3.1. Processes of flexibility products	Gen (*) Also, for opt-out only the perimeter of the BRPfsp is corrected and for passthrough regime, the process 'BRP perimeter correction' is not needed.	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.		To avoid inconsistency with the Terms & Conditions of the different products, following has been adapted:	A
						"Also, for opt-out only the perimeter of the BRPfsp is corrected and for passthrough regime, the process 'BRP perimeter correction' is not needed." is changed into "For the specific rules and exceptions of the 'BRP perimeter correction', we refer to the Term & Conditions of the relevant product and the ToE rules (see website Elia)."	
						Footnotes are changed into: aFRR is today only via opt-out or passthrough configuration => The impact on the BRP perimeter correction is described in the Term & Conditions of the aFRR product and the ToE rules (see website Elia).	
FEBEG	Market Guide Flex	3.1. Processes of flexibility products	Gen Footnote 16 &17: aFRR is today only via opt-out or passthrough configuration	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.		The SO's thank FEBEG for their input. The current solution is indeed temporary. The relevant parties are taking actions to evaluate the different solutions. In a later stage, the market parties will be consulted on the result.	N
FEBEG	Market Guide Flex	3.2. Metering requirements of flexibility products	Gen 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.		To clarify this topic, we added following info in the footnotes.  Footnote: 3rd party submeter: FCR: only private meters, because no metering requirements from DSO ; aFRR: semi-regulated, because metering requirements described in C8/06.	A
FEBEG	Market Guide Flex	4.2.3. Net Flex Study	Gen 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.	FEBEG 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. FEBEG regrets that within Bxl & Wal for each aFRR connection point we need to request a NFS, this will hinder market development.		This is a consequence of differing regional legislation, and is not a matter that can be adressed by the various SO's.	N
FEBEG	Market Guide Flex	4.2.3. Net Flex Study - Process	Edit 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	The DGU ( <b>or the FSP on his behalf</b> ) sends a request for a Net Flex Study		Regional differences, in Brussels only the FSP can request a NFS.	R
FEBEG	Market Guide Flex	4.2.3. Net Flex Study	Gen 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)	FEBEG 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.		We understand the complexity for the FSP to take this into account in his contracts. However, in order to maintain operational security of the grid at all times, the DSO can limit flexible power temporarily. The fact that this limitation is only applied 12 months after the moment when the zone turns red for existing qualifications allows the FSP to take this into account in his bids. Exceptions are foreseen where this is not the case, e.g. for certain multi-year contracts.	N
FEBEG		4.2.5. Set up ex post	Edit Process description. Starting signal: The DGU requests the DSO to install a specific meter	Process description Starting signal: The DGU ( <b>or the FSP on his behalf</b> ) requests the DSO to install a specific meter		No change needed: a DGU can always mandate a third party for his interactions with the DSO.	R
FEBEG	Market Guide Flex	4.3.1. Sign FSP-FRP contract	Edit <del>ToE in DA/ID market</del>	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.		For this product, the FSP needs to sign the FSP contract DA/ID, which is published on the Elia website. A cross has been added to the table in 3.1 so that it is aligned with chapter 4.3.1	P
FEBEG	Market Guide Flex	4.3.4. Stop service	Gen 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)	FEBEG 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.		We refer to the answer on line 54. The service is stopped (temporarily) by the DSO but not due to the DSO. In the first case, it is because contractual requirements are no longer fulfilled. In the second case, it is caused by the connection/behaviour of grid users.	N

FEBEG	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.	FEBEG 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?		In this context, BSP referred to Balancing Service Provider (which fulfills the role of FSP), not Balance supplier.	
FEBEG	Market Guide Flex	7.1.2. BRP perimeter correctio	Edit orial	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'	=> BSP has been changed in the text into 'FSP', to avoid inconsistencies in abbreviations and definitions.	Agreed, the title has been changed to '7.1.2. BRP A perimeter correction' to align with the table.
FEBEG	Market Guide Flex	7.1.2. BRP perimeter correctio n for Transfer of Energy	Tech nical	This correction is done by the TSO based on the Energy Delivered and Requested volumes. 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. In case of opt out, there is a correction of the BRPfsp with the Requested volume.	The correction in this step is not limited to the BRPsource.		To avoid inconsistency with the Terms & Conditions of the different products, the summary process description has been adapted: For the specific rules and exceptions of the BRP perimeter correction, we refer to the Term & Conditions of the relevant product (eg. aFRR, mFRR, ...) and the ToE rules (see website Elia).	A
FEBEG	Market Guide Flex	8. Billing	Gen eral	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).	Will the DSO then also guarantee the data flow for billing purposes & audit proof for flexibility?		Terms & conditions for specific meters are described in Synergird regulations (C8-02, C806). Tariffs are the purview of the respective regulators	N
FEBEG	Market Guide Flex	8. Billing	Gen eral	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	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 encured 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.		We take note of the point. Tariffs are the responsibility of the regulators.	N
FEBEG	C8-01	Stap 2: NFS-studie	Gen eral	"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."	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.		Out-of-scope for this document release. Efforts related do this are ongoing.	N
FEBEG	C8-01	Stap 3: resultaat van de NFS-studie: impact op de kwalificatie van de aansluitingspunten	Gen eral	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.	For FEBEG, the proposed change " <i>provided the full prequalified capability was contracted</i> " should be deleted for 2 reasons: 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."		We do not follow the first comment, as the exemption for multi-year contracts is intended to prevent such a change of rules during the contractual period. We do, however, point out that it refers to the contract with the FRP, not the FSP. We understand the potential ambiguity that is described in the second comment. The proposed addition is included in view of the evolution towards support of flexibility on low voltage access points. These are typically aggregated in bids (e.g. CMU for CRM). If the aggregated capacity is voluntarily reduced by the FSP (e.g. through (partial) opt-out) then the DSO should guarantee flexible capacity at all underlying points, where it may never be used or needed. We clarified that the addition is for " <i>maximum capacity that can be contracted based on the prequalified capacity</i> ". This should solve issue like for the CRM de-rating.	P
FEBEG	FSP-DSO Contract	Bijlage 1 - diensten catalogus	Tech nical	The DSO's headmeter must be quarterly metered and the quarterly values must be used in the allocation.	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.		The SO thank FEBEG for this remark. For mFRR and ToE in DA/ID, this was an oversight, and and text has been added to bring the formulation in line with that used for aFRR and CRM. SDR is an older product which is being discontinued, as it has been superseded by CRM.	A

FEBEG	General	General	General	<p>General assessment</p> <p>FEBEG supports the general objective of opening the Automatic Frequency Restoration Reserve (aFRR) to low voltage network users. However, FEBEG cannot accept that the modalities of application of this opening are not sufficiently explained and, in addition are made at the expenses of the suppliers and the BRPs associated. Unfortunately FEBEG notes that the practical application of this opening at low voltage level proposed by Synergrid would be carried out at least initially, in a temporary phase, on the basis of the opt-out or pass-through configuration.</p> <p>For FEBEG, the opt-out, and certainly the existing ToE mechanism (as described in the Electricity law) is administratively too cumbersome for suppliers and BRP's and costly to implement on the distribution network. This mechanism is not a sustainable solution since:</p> <ul style="list-style-type: none"> <li>▪ From an administrative point of view, it is very cumbersome and complex, and requires agreements between each supplier and each flexibility service provider, making its application on the distribution network undesirable and not feasible.</li> <li>▪ Furthermore, the volumes of flexibility at low voltage level are expected to be relatively limited, so that the costs involved will also be (in perspective) much higher compared to the current application at high voltage level, which would be a major obstacle to attracting more flexibility to the market.</li> </ul> <p>Therefore and as defended in the context of other initiatives, FEBEG pleads to move directly to the new mechanism of individual correction and financial compensation through the final customer, that its application is generalized also at the low voltage level and integrated in the regular market processes (Atrias). For FEBEG, this new mechanism is the only one that will allow end customers to more easily value their flexibility and thus contribute to a greater supply of flexibility on the markets – including on the low voltage, in a sustainable and balanced way for all actors. This being said, there is a major difference between the DSO and TSO level, since at TSO level we have metering at Delivery Point level (per Qh), while at DSO we have an allocation process. Many questions will have to be answered. How will the allocation to the delivery point be organized in practice, specifically, will it be allocated to the correct supplier/BRP at DSO level? How will the DSO's distinguish this? How will DSO have a clear view on which supplier/customer is impacted and how? For FEBEG individual customer/supplier information is necessary to take into account in the allocation correction to ensure correct implementation.</p> <p>While waiting for a quick generalization of the individual correction mechanism and financial compensation through the consumer on all voltage levels, FEBEG believes that an opening of the aFRR on the low voltage level based on the opt-out regime is an acceptable temporary solution. And this, under the explicit condition that the model evolves as soon as possible towards the individual correction regime and on the condition that the above concerns are addressed (regarding correct allocation). The Opt-Out mechanism can work on the condition that the suppliers/BRP receive info on the volumes involved (while still complex).</p> <p>For the pass-through mechanism, FEBEG admits that it is not administratively complex, however, we estimate such mechanism does not fit for almost all of the DSO connected consumers, since a very good understanding of the energy market is a pre-requisite for this type of contract.</p>	<p>Synergrid takes note of the point and understands that local correction in the contact of aFRR Low voltage are requested by FEBEG. The scope of the aFRR Low voltage fast track is currently limited to a go-live without any corrections in the portfolio of the Supplier and the BRP.</p> <p>Synergrid would like to remind the work that is being done in the context of the study on Transfer of Energy on Low voltage and the possibility for a local perimeter correction mechanism. Both initiatives will be discussed with the market (by Product design groups flex) and could have an impact on the implementation of local corrections in aFRR</p>	N
FEBEG	General	General	General	<p>On metering</p> <p>Specifically on metering devices and requirements, FEBEG strongly encourages DSO and Elia to continue to work on a feasible and aligned regulatory framework to allow for semi-regulated metering devices and solutions, also behind the meter (for example, existing metering devices which are already in place within the flexible asset). Not only for aFRR or specific Elia products, but also for future flexibility services at the DSO level.</p> <p>FEBEG also wishes to share some concerns regarding metering: according to us DSO meters (digital meters) are not synchronised with NTP (deviation up to 1 min is possible). If semi-regulated meters will be allowed (in the future) for various services, these types of limitations need to be considered in the overall market design (for example, less strict ramp-up requirements).</p>	<p>Thanks for the remark. Semi-regulated metering specifications will be clarified more in detail by all SO's &amp; Synergrid (c8/02). There is also always the possibility for real time metering of the P1 &amp; A1 port &amp; time synchronisation by the RTCP - real time communication platform, used for aFRR gateways &amp; meters. The clarification of time(stamp) synchronisation error is looked more in detail for the digital meters for all energy markets.</p>	N
FEBEG	General	General	General	<p>SO - cooperation</p> <p>In addition to the above, and as a general comment, FEBEG asks the System Operators (DSO/TSO) to cooperate as much as possible, and align on general principles, definitions, implementation timelines, etc... for new regulation. (for example also on the CRM principles mentioned in the consultation).</p>	<p>We thank FEBEG for this remark, and we share this position.</p>	N
Febeliec	General	General	General	<p>Febeliec answer to the Synergrid consultation on Flexibility</p> <p>Febeliec would like to thank Synergrid for its consultation on flexibility, on the Market Guide Flexibility, the Synergrid Prescription C8/01 and the FSP-DSO Agreement.</p> <p>Febeliec in general would like to insist that all public system operators do their utmost best to remove all barriers in order to ensure that all flexibility can find its way to all markets, towards frequency and non-frequency related products of system operators but also explicit and implicit participation in the energy markets. Febeliec finds the current proposals only a very small (positive!) step in this direction, as it will allow a.o. aFRR on low voltage, but it is by far not sufficient to attain the abovementioned ultimate goal. Febeliec thus wants to urge most strongly that all system operators and regulators accelerate their endeavors on unlocking all flexibility in the system to the benefit of all grid users through more efficiency and a lower overall system cost.</p>	<p>The SO's thank Febeliec for their input. The Flex roadmap was discussed during the Stakeholder meeting preceding the start of the consultation. The SO's continue to implement the roadmap.</p>	N
Febeliec	Market Guide Flex	General	General	<p>Market Guide Flexibility</p> <p>Febeliec would like to make following comments on the Market Guide Flexibility. In general, and as will become clear from the comments below, the specific provisions for CDSs still need to be added, and it seems as if the overall reflection and analysis has not yet been conducted, which Febeliec regrets. Febeliec insists on the importance hereof, as most of current flexibility comes from industrial consumers (a.o. due to incomplete or not yet started smart meter roll-out to low voltage, not all products already available for all types of grid users, ...) and a substantial share of this flexibility is located within CDSs.</p>	<p>The SO's thank Febeliec for their input. The SO's are looking forward to discuss CDSO provisions related to flexibility with Febeliec. A date for a meeting has been set in september 2023. As Febeliec indicates, in their final comment, that their concerns regarding CDSO's are not currently blocking, the outcome of these talks will be reflected in later versions of the MG Flexibility and related documents.</p>	N
Febeliec	Market Guide Flex	Definitions	General	<p>On the definitions: Febeliec insists that these are aligned as much as possible with the definitions used in other regulatory documents, in order to avoid any confusion. Febeliec refers a.o. to CMU, but also DSO (with the specific situation of CDSOs which are according to European legislation also DSOs and where any confusion between public and closed DSOs should be avoided; a definition of CDSO or specific specifications on the role of the CDSOs are lacking), HV, MV and LV (where HV is defined as up to but not including 380 kV (?) and where for MV no upper boundary is provided). As mentioned above, definitions for a CDS and CDSO are not included in the document.</p>	<p>The SO's thank Febeliec for their input. The SO's are looking forward to discuss CDSO provisions related to flexibility with Febeliec. A date for a meeting has been set in september 2023. As Febeliec indicates, in their final comment, that their concerns regarding CDSO's are not currently blocking, the outcome of these talks will be reflected in later versions of the MG Flexibility and related documents. For the definition of the voltage levels, we refer now to the relevant legislation and extended this throughout the document.</p>	P



Febeliec	Market Guide Flex	Roles and Responsibilities	General	On the roles and responsibilities: The market roles diagram is not really legible. Moreover, the role of the CDSO (if applicable) is not mentioned, where it is clear that a CDSO as relevant system operator for the grid users in its grid has a major role in the market roles diagram (if applicable). The same applies for the contracts between market parties diagram as the CDSO will also play a role there (if applicable). On 2.3.2.1, Febeliec suggests that an FRP can have (and not has) an agreement with one or more FSPs.	The SO's thank Febeliec for their input. The SO's are looking forward to discuss CDSO provisions related to flexibility with Febeliec. A date for a meeting has been set in september 2023. As Febeliec indicates, in their final comment, that their concerns regarding CDSO's are not currently blocking, the outcome of these talks will be reflected in later versions of the MG Flexibility and related documents.  Regarding the editorial remarks: The market roles diagram is made more legible, and the text in 2.3.2.1 has been changed into "can have".	P
Febeliec	Market Guide Flex	Flexibility Product overview	General	On the flexibility product overview, Febeliec regrets that for low voltage no mFRR, SDR and ToE in DA/ID are included. While Febeliec understands that participation from DSO-connected grid users to these products might not be possible today, it hopes that these will be added as soon as possible. On the metering requirements (3.2), Febeliec insists that not only the FRP and DSO need to define the relevant metering requirements, but that (when applicable) also the CDSO is included in this discussion. Moreover, Febeliec also most strongly insists that for flexibility products, not only metered values but also calculated values (based on metered values) should be allowed, insofar that a correct perimeter can be defined for the determination of delivery of the service (as is currently already the case on the Elia grids).	Thanks for the remark. Opening of DSO-connected points for the mentioned services is foreseen in the roadmap Flexibility. Relevant metering requirements will be discussed in the meeting planned with Febeliec on the role and position of CDSO's with regards to Flexibility. Regardless of the outcome of this meeting, once metering requirements have been drafted, they will also be the subject of a public consultation. BRP perimeter correction is out of scope of this consultation.	N
Febeliec	Market Guide Flex	Prequalification	General	On prequalification, Febeliec insists that also the CDSO (when applicable) as relevant system operator for the grid users in his grid is included in the flow. The same applies for the gateway and its setup, as well as for update and stop of the service and so on.	The SO's thank Febeliec for their input. The SO's are looking forward to discuss CDSO provisions related to flexibility with Febeliec. A date for a meeting has been set in september 2023. As Febeliec indicates, in their final comment, that their concerns regarding CDSO's are not currently blocking, the outcome of these talks will be reflected in later versions of the MG Flexibility and related documents.	N
Febeliec	Market Guide Flex	4.2.4	General	On section 4.2.4, while Febeliec regrets that for low voltage only 1 SDP-Flex can be registered per product and only at headpoint level (Febeliec considers this a barrier for full valorization of flexibility), it most strongly insists that such limitations are not acceptable on medium or high voltage.	The restriction of 1 service delivery point flexibility per access point is chosen to allow for an earlier introduction of aFRR on LV. A framework for multiple SDP per headpoint is in preparation. This is also an evolution which is included in the new EMD reform discussions. We expect further legal and regulatory specifications will follow, after which the framework for multiple SDP (and submetering) may be extended for aFRR as well.	N
Febeliec	Market Guide Flex	determination of the nominal reference power, prequalification checks and tests	General	On the determination of the nominal reference power, prequalification checks and tests by the FRP and so on, Febeliec again insists that also the CDSO (when applicable) as relevant system operator for the grid users in his grid is included in the flow, in particular whenever tests are to be conducted, as these will also have an impact on the grid of the CDSO (in a similar approach as the procedure to include the DSO and for similar reasons).	The SO's thank Febeliec for their input. The SO's are looking forward to discuss CDSO provisions related to flexibility with Febeliec. A date for a meeting has been set in september 2023. As Febeliec indicates, in their final comment, that their concerns regarding CDSO's are not currently blocking, the outcome of these talks will be reflected in later versions of the MG Flexibility and related documents.	N
Febeliec	Market Guide Flex	Annexes	General	On the annexes, Febeliec has not had the opportunity to deep dive in all documents, but already wants to explicitly refer to its comments on CDSOs and the need for their inclusion in several of the issues covered by the annexes.	The SO's thank Febeliec for their input. The SO's are looking forward to discuss CDSO provisions related to flexibility with Febeliec. A date for a meeting has been set in september 2023. As Febeliec indicates, in their final comment, that their concerns regarding CDSO's are not currently blocking, the outcome of these talks will be reflected in later versions of the MG Flexibility and related documents.	N

Febeliec	C8-01	General	General	On the Synergrid Prescription C8/01, Febeliec a priori has no specific comments, except on the need in some cases for the inclusion of the CDSO (when applicable) as there might also be potentially impact on its operational safety.	The SO's thank Febeliec for their input. The SO's are looking forward to discuss CDSO provisions related to flexibility with Febeliec. A date for a meeting has been set in september 2023. As Febeliec indicates, in their final comment, that their concerns regarding CDSO's are not currently blocking, the outcome of these talks will be reflected in later versions of the MG Flexibility and related documents.
Febeliec	FSP-DSO Contract	General	General	On the FSP-DSO Agreement, Febeliec also explicitly wants to refer to the need in some cases for the inclusion of the CDSO (when applicable). This could for example include the identification (EAN), testing, activation of flexibility, metering, validation and so on. Febeliec refers in this context also to the other comments made above. Febeliec does not consider this a blocking point, but nevertheless provisions need to be included which reflect and accept the central role of the CDSO as relevant system operator for his grid users.	The SO's thank Febeliec for their input. The SO's are looking forward to discuss CDSO provisions related to flexibility with Febeliec. A date for a meeting has been set in september 2023. As Febeliec indicates, in their final comment, that their concerns regarding CDSO's are not currently blocking, the outcome of these talks will be reflected in later versions of the MG Flexibility and related documents.