



Consultation Documents Flexibility: Recieved Response Notes

Received response notes

Benewable

Centrica

FEBEG

Febeliec

Noven

Thermovault.

This document contains the long-form reactions on the consultation document release 2 from market parties in the form that they were received.

SYNERGRID PUBLIC CONSULTATION REGARDING THE RELEVANT DOCUMENTS ON FLEXIBILITY (RELEASE II)

Bnewable, as an emerging Belgian energy company specializing in (behind-the-meter) hybrid battery storage systems, we extend our sincere gratitude for the opportunity to participate in the public consultation.

Primarily, we wish to underscore that **our contribution to this consultation is non-confidential**, and we agree to its inclusion in the consultation report.

As a newcomer in the Belgian market, we assert that all network operators, in their role of market facilitators, should strive to eliminate barriers obstructing the integration of various forms of flexibility into the market. Unimpeded access for smaller and new players to markets is pivotal in unlocking the full potential of flexibility resources, promoting energy efficiency, and concurrently reducing system costs.

Having examined the consultation documents, we observe that most modifications presented apply solely to clients connected to the low-voltage distribution network (especially so for the market guide for flexibility).

However, the C8/01 (V14) document extends its applicability to both low-voltage and medium-voltage levels, the latter being where the majority of Bnewable's clients are connected. Hence, Bnewable finds it essential to express our general concerns regarding the applicability and use of the Network Flexibility Study (NFS). We hold the opinion that the NFS does not provide substantial added value; moreover, it acts as a significant barrier for new behind-the-meter business cases.

Today, grid users pay for a connection with an insured capacity, allowing them to adjust their consumption based on parameters of their choice (schedule, outside temperature for cooling, holidays, etc.), with limitations applicable only in specific curtailment scenarios and within the capacity constraints of their grid connection. If it proves technically infeasible to allocate the capacity, the grid user will not obtain the requested network capacity, or only under a future flexible contract with specific limits.

Therefore, Bnewable believes that it is not appropriate for a network operator to impose additional restrictions on grid users regarding their participation in ancillary services and/or other flexibility services, as long as these grid users stay within the specified limits of their network connection.

Consequently, we advocate for the potential abolition of the NFS. Aligning with the established approach in Flanders for low voltage, where no restrictions are imposed, we propose extending this favourable stance to all voltage levels across regional and federal public networks.

In summary, Bnewable emphasizes the importance of avoiding unnecessary restrictions on industrial consumers and barriers for new business models and market parties. We believe this approach will contribute to a more dynamic and responsive energy landscape and unlock the full potential of flexibility located at the distribution level.

Bnewable is and remains fully available for further discussions on the positions outlined. We appreciate your consideration of our feedback and look forward to continued collaboration and meaningful discussions.

Kevin Milis, Synergrid
marketconsultation@synergrid.be

Consultation on Flexibility Documents (Release 2)

26 January 2024

Dear Synergrid, dear Kevin,

Since 2017, your federation actively opened markets for low-voltage users. We pioneer in offering industrial and residential flexibility at the distribution level. This year, we plan to integrate thousands of low-voltage assets into balancing reserves.

Unlocking more flexibility is crucial amid rising renewables and electrification. However, costs rise due to metering and data communication constraints, without benefiting grid operators.

Deciding on a way forward

- We are excited about new low-voltage opportunities. This will boost network resiliency, benefit consumers and drive technological innovation.
- We insist on relaxing and harmonising metering requirements to unlock flexibility, support renewables, and cut costs.
- We encourage facilitating real-time communication for efficient flexibility management in the distribution grid.

Recommended actions

We urge collaboration with Elia, regulators, and industry to relax and harmonise metering requirements across markets. We recommend virtual meter points enabling aggregation of private meters for multi-asset sites, and centralised communication with lower data sampling requirements for small-scale assets.

Furthermore, we suggest amending the rules to improve the transfer of energy, enhance and simplify grid user mandates, and ease constraints for flexibility groups. Finally, we ask you to clarify CDSO-level metering, multi-FSP, and queue management rules (cf. Annex 2).

Your consideration of industry views is vital to opening markets to low-voltage flexibility. Please contact us for any further clarification.

Sincerely yours,

Patrick Adigbli
Regulatory Affairs & Policy
patrick.adigbli@centrica.com

We are excited about new low-voltage opportunities. This will boost network resiliency, benefit consumers and drive technological innovation.

Your federation plans to open the automatic reserve (aFRR) and capacity mechanism (CRM) to low-voltage users.

We support this initiative, which boosts grid efficiency, reduces congestion, and improves system resiliency. This benefits grid users with better services and revenue streams, while supporting renewables and climate targets.

We explore adding thousands of low-voltage delivery points to aFRR, contingent on regulatory developments, and anticipate a significant increase upon successful launch.

Automated onboarding through API and the 'Flex Hub', along with harmonised network prequalification, supports this ambition. This will cut costs, simplify processes, and speed up time to market.

We insist on relaxing and harmonising metering requirements to unlock flexibility, support renewables, and cut costs.

Industrial and residential users have metering equipment tailored to their needs. Industrials generally use metering components with an accuracy class above 0.5; residential appliances, like electric vehicle charge points, typically transmit data every minute.

Proposed metering requirements limit flexibility offerings in markets like Elia's automatic and manual reserves. Metering and data sampling standards are excessively high and misaligned across aFRR, mFRR and CRM, adding complexity and costs. We highlight these challenges in Annex 1.

In 2014, calls for relaxed metering requirements emerged¹. A decade later, Elia begins easing submetering requirements² and proposing derogations for smaller transmission-connected assets³. While positive, these new metering requirements remain too high; this shouldn't be mirrored on distribution level. Three ways for improvement exist:

- 1) Lower accuracy class requirements to the EU's minimum. Additional constraints should apply based on activated energy (MWh), not connected capacity (MW), since measuring activated energy with precision is what matters for the transfer of energy. This change is crucial for 1-20 MW assets facing strict proposed standards.
- 2) Allow less frequent sampling rates for 'behind-the-meter' devices. Draw inspiration from the UK's recent [code reform](#) and [accuracy standard review](#).
- 3) Clearly define the metering certification methodology, including a detailed prequalification procedure for device-embedded asset meters.

¹ [Elia Balancing Task Force, 20 November 2014](#)

² [Elia General Technical Requirements, 1 December 2023](#)

³ [Elia Plenary Meeting Proposal on Submetering, 19 December 2023](#)

We urge you to intensify efforts towards relaxed and harmonised metering requirements across markets. It's key for scalability, cost reduction, and unlocking flexibility. We stand ready to provide examples of specific site configurations.

We encourage facilitating real-time communication for efficient flexibility management in the distribution grid.

Your proposal suggests that local gateways collect and directly relay data to Elia's real-time communication platform from 1 January 2025. This creates various flexibility barriers:

- It prevents streaming aggregated data from multiple private meters behind an access point without an additional physical meter.
- Small-scale assets need direct device communication or an extra gateway. This demands OEM investments – unlikely for country-specific features – or raises costs. Either way, this duplicates consumer data streams and increases broadband costs.
- Small-scale assets must match power plants in data granularity, costing 5-10 EUR per device annually. This harms the business case, especially with numerous devices.

We have identified three options to improve:

- 1) Implement virtual meter points allowing aggregation of conform private submeters behind an access point, with audit rights granted to system operators.
- 2) Exempt small-scale assets from direct connection to Elia's platform. This allows for cost-effective, cloud-based and centralised communication, which proves successful in the FCR reserve ('virtual' delivery points).
- 3) Lower data rates for small-scale devices to cut cost.

We recommend enabling virtual meter points for sites with multiple private meters, and adopting centralised communication with lower data sampling requirements for small-scale assets. This helps improving flexibility management in the distribution grid.

Annex 1 – Flexibility barriers

Example 1	Example 2	Example 3	Example 4	Example 5
<p>A 20 MW industrial site providing mFRR for a few hours faces the same 0.2 accuracy class requirement than a 400 MW gas turbine providing aFRR all year long.</p> <p>The industrial site has, however, a much lower absolute error – this remains true even with an accuracy class 2, instead of 0.2.</p>	<p>An industrial site is subject to certain metering requirements based on its 8 MW total connected power.</p> <p>However, this doesn't consider that the site is composed of two 4 MW assets never running at the same time – in essence, there is only 4 MW flexible power.</p>	<p>A site complying with aFRR submetering standards can't access the manual reserve (mFRR) without installing additional TSO dataloggers, or official DSO meters.</p> <p>This is costly and takes time.</p>	<p>Metering data from electrical vehicle charging points is typically available once per minute.</p> <p>Higher sampling rate requirements exclude their participation in the automatic reserve (aFRR).</p>	<p>The current certification methodology refers to Elia's 'General Technical Requirements for Private Measurement'.</p> <p>This document, however, lacks a concrete protocol for certification.</p>

Annex 2 – Additional amendment proposals

Improve the transfer of energy	The quickest path for low-voltage flexibility in the aFRR market is opting out of the transfer of energy (ToE). This requires supplier agreement. However, we continue to observe suppliers blocking participation and hindering progress. We urge considering a fallback mechanism or Elia's correction model for unlocking distribution grid flexibility.
Enhance process efficiency	We appreciate that there is no need for a separate NFS application for low-voltage (Market guide, p. 39). We recommend making this a general rule for all voltage levels to harmonise and speed up processes, especially as a service can only start the first day of the month.
Align contractual dates	The proposal indicates the SDP-Flex has no end date for low-voltage assets (Market guide, p.86). We appreciate this and suggest applying this for all voltage levels to avoid unnecessary Grid User Declaration (GUD) renewals.
Simplify mandates	We suggest having one common mandate instead of three: Elia GUD, NFS/CC mandate, and, in the case of aFRR, an RTCP mandate.
Clarify market impact	We seek clarification on the impact of following rule (FSP-DSO contract, p.5): 'Indien een wijziging op de leveringsmarkt impact heeft op het SDP-F (zie MG Flex), dan zal de DNB het SDP-F overeenkomstig aanpassen.'
Clarify	We believe that 'ensuring conformity between the flexibility contract and the

<p>challenges</p>	<p>connection agreement’ (FSP-DSO contract, p.6) highlighted in <i>red</i> is a responsibility of the grid user owning the connection contract, not the balancing service provider (BSP): ‘De FSP erkent uitdrukkelijk het feit dat om een SDP-F in de Pool op te nemen, de verplichting bestaat minstens effectief een flexibiliteitsovereenkomst met de betrokken DNG onderschreven te hebben <i>die verenigbaar is met het aansluitingscontract en met de kwalificatie van het aansluitingspunt afgeleverd door de DNB.</i>’</p>
<p>Clarify metering specifications</p>	<p>Please clarify metering specifications proposed in C8/06, particularly their applicability to Closed Distribution Grids at DSO level.</p>
<p>Ease constraints for low-voltage flexibility providing groups (LV DPG)</p>	<p>We appreciate your proposal for LV DPG but have concerns about its strict definition. The unique identification with EAN and limitation to a single flexibility product, requesting party, and service provider may hinder value stacking options. A more flexible inclusion of low-voltage grid devices would enhance prequalification, aggregation, and settlement processes.</p>
<p>Clarify queue management</p>	<p>We request a defined process for queue management during grid bottlenecks (red zone in C8/01), currently absent in the document.</p>
<p>Clarify multi-FSP rules</p>	<p>The document lacks clarity regarding multiple Flexibility Service Providers (FSP) managing Service Delivery Points (SDP-F) under the same connection point. Presently, the only limitation is SDP-Fs requiring placement at the installation head or on separate circuits. We seek clarification on prequalification effects and flexible volume calculation in scenarios with several SDP-Fs managed by different FSPs.</p>

Subject: **Synergrid consultation on flexibility documents release 2:
FEBEG Position**

Date: 26 January 2024

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This position sets out the comments and proposals of FEBEG and its members in the context of the consultation organized by Synergrid on the document related to Flexibility – release 2 – for the benefit of grid operators, in response to the following developments:

- Opening of the automatic Frequency Restoration Reserve (aFRR) to low voltage network users.
- Adjustment of the operating rules of the capacity remuneration mechanism (CRM).

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1. Overall comments

FEBEG welcomes the proposals of Synergrid to open the flexibility market and allow CRM participation of low voltage grid users.

FEBEG is in favour of any approach that can unleash more flexibility from the low voltage grid, and thus enable a market-based activation of flexible assets to help integrate more intermittent renewables and avoid unnecessary congestion and curtailment.

In particular on the opening of the low voltage grid for aFRR, FEBEG wishes to highlight the following considerations:

1. It is of utmost importance that the product design remains technology-neutral and non-discriminatory.
2. Possible changes to the product design should be carefully assessed considering implementation costs/burden for all involved aFRR providers.
3. New technologies/processes providing aFRR might also come with a high activation price.

FEBEG would like to invite Synergrid to take these considerations into account when discussing product design and opening low voltage levels for aFRR.

In addition, we use this opportunity to stress the need for a simple and aligned approach in Belgium across the TSO and DSO level. Indeed, a simple and aligned approach will ensure overall cost effectiveness, which will have a positive impact on the business cases and thus increase the overall appetite of consumers to become “actors of energy systems” and actively participate in the market. Furthermore, an aligned and integrated approach will result in lower costs for suppliers and all involved stakeholders, and therefore a higher likelihood of a wide-spread market uptake.

In this context, FEBEG still pleads to move in term 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). The opt-out, and certainly the existing ToE mechanism (as described in the Electricity law) is administratively too burdensome for suppliers and BRP's and costly to implement on the distribution network. This mechanism is not a sustainable and cost-efficient solution since:

- From an administrative point of view, it is very burdensome and complex and requires agreements between each supplier and each flexibility service provider, making its application on the distribution network inadequate and not feasible.
- 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.

2. Specific comments on Market Guide Flex 2.0

2.1 Main and major issues and concerns regarding the Market Guide Flex 2.0.

- §4.3.2 mentions *“De DNB controleert niet of de dienst kan worden gecombineerd met bestaande diensten op het Aansluitingspunt, aangezien dit de verantwoordelijkheid van de FSP is.”*

FEBEG wonders whether the FSP can check this alone. An FSP is probably not always aware of other flexibility services that are active on an access point. What about a service as Energy sharing?

- Section 4.4. on the interactions with the supply market is not considering the consequences of structuring processes with an effective date in the past which is problematic and can lead to activations of Flex for which there is ultimately no valid mandate (DNG moved) or for which there is no valid contract/ToE agreement between the FSP and the new supplier/BRP.

Just as for AMRs, where structuring processes have a start date in the future, this must also be introduced for customers who provide flexibility services. After all, due to the presence of a digital meter, the meter reading is read automatically on switch date and therefore a move can be reported upfront. While this restriction is not implemented in the market processes, the FSP–DSO contract and the FSP–DNG contract could include the obligation for the grid user to report a move in advance.

- §4.4.1. mentions *“Maandelijks verwerkt de netbeheerder de bijgewerkte Structuring info. De wijziging gaat in vanaf de verwerkingsdatum.”*

A monthly treatment of the changes can lead to activations for which ultimately no 15' values are available (deactivation of SMR3). This also means that in case of a structuring process with a start date of 30 days in the past, **the situation without valid mandate or contract can last up to 2 months.** It is evident that **this way-of-working can only remain very temporary.**

- 10.4 – *Aggregatie van meetgegevens*

FEBEG is puzzled by the way the delivery point group is presented in the MGF2.0. We have the feeling that the delivery point group is just a data structure to simplify the aggregation of data, when required, as a class function. However, in our understanding,

the **data still needs to be stored individually**. This because the FSPs need to comply on a possible request for information on an individual data point within a group. Concretely, what is then the use in such case of the delivery point group? In addition, the aggregation is apparently **the responsibility of the DSO, which could (if we understand correctly) have some downsides**. Indeed, when it comes to aggregation, it could be more logic to have the FSP managing the aggregation and then, for example, allow for an audit/check by the DSO? This would be more practical, compared to the DSO managing the aggregation. Overall, for FEBEG it is **not very clear what is the role and responsibilities of the DSO and the FSP regarding the aggregation, we ask that this to be clarified**.

6. Aggregeren meetgegevens Als de aanvraag betrekking heeft op een LS Delivery Point Group, worden de meetgegevens van alle SDP-Flex – gekoppeld aan de aanvraag voor de gevraagde datum – geaggregeerd door de DNB. Hierdoor zal het voor de FRP/FSP lijken dat de meetgegevens afkomstig zijn van slechts 1 Flex punt.

FEBEG is very concerned that such requirements will hinder the development of flexibility at the low voltage level. We think that this will make the **service very costly for B2C segments**. Indeed, there are many requirements in terms of data which need to be shared and the real time aspect of very granular data- to allow the TSO to reconstruct the pool that was created. Where the DSO as such might not need the 4 sec. data, we understand that the TSO does, which in practice has an important impact on the business case from FSP point of view (see below comments on the general requirement – C8/06).

We like to share an additional/alternative thought on this issue. If the GRDs would oversee the costs of hardware and data management, FSPs can maybe imagine still having a cloud-based service where the data is coming from the sub-meter. FEBEG suggests looking at a solution in which DSOs install sub-meters to check how much has been freed up in terms of Flex and where the FSP can steer cloud based and is not responsible of any installation. **This would allow the FSP to participate without having to bear all the costs**. Generally speaking, it is very important that the service of the FSP needs to be low cost... this is only possible if we can manage this within a certain authorised margin and quality.

2.2 Request for clarifications

- Figure 6 in §2.3.3. correctly indicates the possible existence of a ToE agreement between FSP and supplier. Indeed, depending on the product and chosen settlement procedure for ToE such an agreement is mandatory. FEBEG wonders where in the process

the existence of such an agreement is checked? We ask that it is clarified that Elia/DSOs check if there is an agreement / contract between BRPsupplier (Luminus, Eneco, ENGIE...) and BRPFSP before the services (aFRR/FCR) are delivered. How can a utility know that an FSP is active on one of his customers, if he's not the BRPFSP? In this case the ToE needs to be activated, but there are no valorisation rules for the transferred energy, so this needs to be part of the individual agreement between utilities and BRPs.

- §4.2.4 As that the SDP-Flex is linked to the GCP (grid connection point) and only 1 is possible per product, it means that once a customer is doing e.g. aFRR with an electrical boiler, no additional aFRR services can be activated on other assets by a different FSP? If the second FSP starts a new aFRR service, the first service is interrupted. Is this correct?
- "10.2 Creation/update of a Delivery Point Group". FEBEG considers that, for this process, an SLA on pool update execution is needed so that we are sure we don't get into a deadlock situation on activation of a pool due to participants moving, opting out, new participants, etc ... When there is a move and/or a switch, and the FSP service is stopped, does this require some kind of manual intervention? For example, to remove the sub-meter. Practically, there should normally be an automatic procedure or process? We understand that an inactive service will not be removed by design and thus an extra action is required to be synchronized. FEBEG asks clarifications. As an additional comment, we are wondering if (re-)certification is needed in case of changes in the pool volume, and at what pace (for every MW or another approach)?

3. General Requirements C8/06

3.1 Crucial concern and request for clarification

Point 2.1 mentions "*Private meettoestellen moeten de gegevens d.m.v. gateways rechtstreeks naar het Communicatieplatform (CP) versturen. Zowel lokale als gecentraliseerde gateways (GW) mogen worden gebruikt en moeten een directe verbinding hebben met het Communicatieplatform.*"

FEBEG finds another contradictory wording further on in the document (in the part 2.2) : "*De gateways worden altijd lokaal geïnstalleerd binnen de locatie van de netgebruiker dat wordt afgebakend door het hoofdpunt/toegangspunt.*"

In addition, further down the document is stipulated that the degraded mode of a centralized virtual gateway is allowed only until Dec. 2024. If that is true, it means that all cloud base solutions won't be compliant with the aFRR delivery. "*Een local gateway die rechtstreeks verbonden is met het Real-Time Communication Platform (zoals beschreven in punten d & hierboven), is de finale vereiste. Een overgangperiode is voorzien tot uiterlijk 31 december 2024.*"

We also read in the document that *“Een gateway moet om de 4s de ogenblikkelijke vermogensmeetwaarden van een meettoestel en andere noodzakelijke parameters verzamelen die nodig zijn voor de aFRR-diensten, en deze in real-time communiceren naar het real-time Communicatieplatform met behulp van een door Elia bepaald communicatieprotocol”*.

FEBEG concludes that cloud steering of LV/residential assets (behind the meter) for aFRR will be very difficult, as you would need a local gateway as of 1/1/2025. Why is this? According to FEBEG, less stringent requirements are requested in neighbouring countries like France, Netherlands, etc. Let’s also note that through cloud steering, it is impossible to provide 4 sec. data real-time since the assets don’t share data at this frequency & granularity.

FEBEG stresses that cloud steering needs to be allowed to practically unlock the flexibility of EV, batteries and HP (with aFRR) for example at household level, but also for almost all other use-cases.

If we understand correctly that gateways need to be installed locally and that it is also required to send every 4 sec. the data needs to be sent out, the combination of the above requirements will constitute a very important hurdle for the (explicit) flexibility to be unlocked at the LV level, since the financial, technical and administrative costs will have an important negative impact on the business case, the latter becoming almost impossible in a B2C setting.

FEBEG wonders if the additional costs for providing real-time 4” data on both sides (TSO & FSP) weighs up to the benefits of having 4” data on real-time basis? Is it realistic to use those values on the SCADA steering? We are convinced that a much better approach would be to foresee audits (even unannounced) or ex-post provision of the data.

3.2 Additional concerns and questions

- In §2.2 there are 3 configurations described of which only 2 are visible on the accompanying figure 2. Configuration 3 (one central gateway for multiple SDP’s at multiple net users) is allowed but then again forbidden in point b/ (a gateway can’t be connected to SDP’s at different net users)?

FEBEG concludes from the requirement of “max 1 msg/s and 4” data” that max. 4 assets per gateway are possible. This is the technical limit/constraint to 4 assets. On top of this... the throttling in case of resending the buffer becomes almost impossible in the case of multiple assets.

- Regarding the metering requirements (Table in section 3), FEBEG wishes to underline that the requested accuracy will be mostly 6% in practice for EV or batteries. Mostly only electrical boilers will be <4kW. In reality, the 10% accuracy will never or very rarely be applicable.

- §3 of C8–06 mentions that a recertification of the measurement device is required every 5 years. These additional costs for recertification of the measurement device are yet another cost to be considered for the customer’s business case, thus reducing the potential of Flex on LV.
- Section 4.1.2.1 mentions only manual download for certificates. This means that FSPs need to take manual actions per gateway which can be a burdensome job if you would have 1k customers...
- Section 4.1.2.2.1: In the Table in §4.1.2.2.1 is not clear enough with regards to which power levels need to be mentioned. For the baseline, the description of the field to insert seems to indicate that it is what would have happened if the service isn’t active, but the timestamp field suggests that it should contain the expected value 1 minute in the future. If this is the case, this should be better described in the description of the baseline field itself, and not hidden in the description of another field in the message.
- Section 4.1.2.5.1. FEBEG doesn’t understand why the Communication platform needs internal information like Gateway software/firmware version. This is an internal/confidential information. FEBEG would like to know why this information is needed.
- Section 4.1.3: Why is there a buffering of 5 days if the connection is lost? If the connection is lost, then there were no activations possible, so what is the point to send them all when back online from the past where we need on top to have a throttle to avoid overcoming other communication? It means that you will take a long time to send them back to keep the rest of activity running when back online. FEBEG considers this to be a very costly requirement, and doesn’t understand the need for it.
- Section 4.1.3.4: “fallback bestand”. For FEBEG, this will be very complex to handle in practice by the FSP. Also, we want to highlight that the requirement for “Fallback files”, up until 90 days, means that 2GB of data per customer needs to be stored and cleaned up.

3.3 Other comments and other unclear elements

- FEBEG pinpoints an important cybersecurity concern: One would normally expect someone to generate a private key themselves and forward a signing request for it to generate the certificate for that key. In the current proposal, FSPs are receiving the private key and linked certificate from a third party, and as such, that party could insert messages in name of the gateway in the queue.

- FEBEG asks what the consequences of missing a 4" msg are? Is a retry required? The Error handling is not described. What happens if messages are not functionally accepted?

4. Network Feasibility Study C8/01

FEBEG understands that the NFS Check is not applicable for Low voltage but, when reading the proposal in the document C08/1, we have the feeling that (while the submission can be digital API or email) you still need to consider a colour response if ok UP and or DOWN, with a potential change in the future. Is there a possibility to predefine a map, as to ensure that the FSP knows what is green so that an automatic "GO Ahead" is generated and the procedure can be fastened?

Related to the above, we are also wondering how long it takes for the FSP to know that it is "safe" (Green colour), what is the delay for this? A swift and fast procedure is essential to facilitate the development of Flex at the LV level.

FEBEG understands from the C8/01 that the form to provide a mandate to an FSP requires a labour-intensive manual process. Furthermore, we wish to clearly warn that it can be cumbersome for a customer to revoke this mandate. Therefore, we wonder why the mandate process is not automated for LV (residential) customers, while the request procedure is? We understand that the process to "switch" between FSPs is manual and thus can take long time.

FEBEG asks to clarify what the costs will be for a residential customer for such a "simplified" NFS procedure? This has an important impact on the business case for the consumer.

5. DNB – FSP agreement

There seems to be no penalty in case of wrong data or gaps of data for low voltage, and the SLA KPI doesn't even mention the data exchange in term of real time and gaps per assets. If it occurs, will the FSP still be paid for potential flexibility delivered or is the penalty that you won't get paid? In brief, we don't understand what happens in case of a missing data point.

Regarding privacy, we see that GDPR is largely mentioned stating it should be compliant. But we are not certain that, given the data required, the minimalist principle of the GDPR to offer a service is respected to protect the private life of the customer.

FEBEG also note that the terminology for CCC within Market Guide and DNB-FSP agreement is not aligned. In DNB-FSP agreement CCC is Customer Contract Check while in the Market Guide CCC is Connection Contract Check.

6. Excel files

FEBEG has no major issues with the proposed excel files.

7. Conclusions

FEBEG wishes to thank Synergrid for all the work done on the new DOC 2 release, which contains many important improvements compared to previous versions.

Nevertheless, we like to underline the following high-level concerns:

1. We appreciate that the procedures have been simplified, but **the practical and technical requirements remain very high**, especially regarding the real-time communication (gateway and platform). Implementing this will represent a cost that is relatively important for residential use-cases (EVs, heat pumps, ...) while the overall business cases are already tight in this setup. Consequently, **we think that the vast majority of the low-voltage flexibility potential will not be accessible and exploitable.**
2. We understand that only one FSP can deliver the same product at the same connection point (either one aFRR or one FCR, not two aFRR services). In practice, in what is proposed, an EV cannot deliver aFRR, even in a multiple-supply use case, when the electric boiler in the same house is already delivering aFRR with another supplier and another FSP (this would only be possible if the FSP is the same for both flexible assets). We consider this to be an issue that should be addressed. FEBEG favours the development of multiple-supply solutions.

In essence, we regret that the requirements set forward in the proposals are still very strict, and we consider that this proposal will not enable the “unlocking” of the flexibility potential at low voltage levels. When we observe what is happening in neighbouring countries, we notice a lack of level-playing field with less strict regulations in France and the Netherlands for example, compared to Belgium.

Febeliec answer to the Synergrid consultation on Flexibility v2

Febeliec would like to thank Synergrid for its consultation on flexibility, on the Market Guide Flexibility, the Synergrid Prescription C8/01 and C8/06 and the FSP-DSO Agreement.

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.

Market Guide Flexibility

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.

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); definitions for a CDS and CDSO are not included in the document.

On the **roles and responsibilities**: 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 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**, 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).

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.

On the **Net Flex Study** (NFS), Febeliec is of the opinion that this does not bring a lot of added value for demand side response, as grid users are currently free to consume whenever they want (except under very specifically delineated situations of curtailment) and within the range of the capacity of their grid connection. Febeliec considers the NFS a barrier to participation, as it does not bring much added value, unless it would enforce or limit certain consumption behavior and profiles for consumers, involuntarily, which is unacceptable (unless as described above under very specific conditions primarily linked to grid security). Febeliec thus most strongly pleads for the abolishment of the NFS for demand side response (but can understand its added value for certain other categories of grid users, with a different constellation). This reasoning is already clearly accepted in Flanders for low voltage, as no restrictions will be imposed

Febeliec represents corporate energy consumers in Belgium for whom energy is a significant component of production costs and a key factor of competitiveness. Febeliec strives for competitive prices for electricity and natural gas for its members, and for more security of energy supply in the context of the energy transition. Febeliec's members are 5 sector federations and more than 40 companies from various sectors (chemistry and life sciences, petroleum products, glass, pulp & paper and cardboard, mining, textiles and wood processing, brick, non-ferrous metals, steel, transportation, construction materials, data centers, telecommunications). Together they represent some 80% of industrial electricity and natural gas consumption in Belgium and 225.000 jobs (www.febеліec.be).

for this category, and should according to Febeliec be extended to all voltage levels and all regional and federal public grids.

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.

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.

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).

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.

Synergrid Prescription C8/01

On the Synergrid Prescription C8/01 on the Network Flexibility Study (NFS), Febeliec insists 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. Moreover, Febeliec evermore struggles with the concept of such an NFS, which it considers a barrier as it does not bring much added value while creating costs and delays. Febeliec considers that any grid user should be allowed to valorize his (demand side response) flexibility as long as this does not exceed the agreed connection capacity, insofar that consumers can not be forced nor forbidden to consume electricity (except under very clearly defined emergency situations for curtailment) and as such an NFS would not provide any additional value as the grid user can modulate his consumption pattern at free will within the agreed grid connection capacity. Febeliec most strongly urges the complete abolishment of the unnecessary NFS, which provides no real additional tangible information on the future behaviour of a consumer. Furthermore, Febeliec also wants to highlight the need in some cases for the inclusion of the CDSO (when applicable) as there might also be potentially impact on its operational safety.

Synergrid Prescription C8/06

On the Synergrid Prescription C8/06 on metering and gateways for aFRR service delivery points, Febeliec at this point has no explicit textual comments, but insists that these technical requirements cannot be allowed to become barriers to entry into the aFRR market, by undue gold-plating related to the technical requirements. Febeliec insist on a cost-benefit analysis which maintains a balance between exactitude and allowing more flexible assets to participate in a market with at this moment important liquidity issues. More participation could have a very positive impact on the overall system costs, even if this implies a possible theoretical loss due to some more freedom on metering and gateway requirements as the benefits for the system would outweigh most negative impacts..

FSP-DSO Agreement

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.



Subject **Public consultation on Synergrid Flexibility Documents –
Document release 2**

26 Jan 2024

Dear,

NOVEN thanks Synergrid for the organization of this public consultation and the opportunity to react to the published documents.

As highlighted by Elia in its 2023 Adequacy and Flexibility Study for Belgium, an increased penetration of flexibility can significantly reduce the gap in required capacity. This increased flexibility will/should also come from residential assets, but this presumes that existing barriers for end-user flexibility are effectively removed.

From the currently published documents, NOVEN understands that the only way for low voltage assets to offer in the aFRR is when an opt-out agreement with the suppliers/BRP is reached. If this is indeed the case, we believe that this could significantly complicate or even impede the participation of these assets to aFRR as it will be very challenging to conclude such agreements with all relevant parties. We request Synergrid to re-evaluate this element in the framework of this public consultation and to propose other solutions (such as a supply split at the residential level).

With respect to the modifications following the Functioning Rules for the CRM, it is unclear to NOVEN why the participation of low voltage assets would be limited to the Y-1 auction. This would appear as a new design element in the CRM that wasn't proposed or approved earlier. NOVEN believes it is beneficial to allow low voltage assets to participate in both auctions to not introduce a new barrier.

Secondly, NOVEN briefly reiterates the points it submitted to Elia with the request to re-evaluate them in the framework of the public consultation:

- NOVEN stresses that in order to ensure effective participation at low voltage level, it is vital that assets at delivery point level (not only at access point level) can participate and that there is no requirement to have a digital meter in SMR3 regime. Seen the limited meters in SMR 3 for the moment, NOVEN requests that own placed MID-certified submeters with an accuracy class 1.0 are allowed as a strategic solution to enhance the TSO's capabilities in managing and optimizing grid flexibility and CRM purposes. These submeters can also provide highly granular data on energy consumption, voltage, current, power factor, and other key metrics.
- In paragraph 82, the following sentence is added: "*A CRM Candidate willing to prequalify low voltage connected Capacities has to prequalify these Capacities as Additional by following the Standard Prequalification Process.*"

It is unclear to NOVEN why low voltage capacities would necessarily have to prequalify as additional (instead of having the possibility to prequalify virtual as well), especially since the concept of virtual capacities was created to encourage the participation in the auction process of assets which would



find it more difficult to already have e.g. all the finalized agreements in place by the Y-4 auction, which would typically be the case for residential assets at low voltage level.

- A new definition of "Low Voltage Delivery Point Group" is added, including a requirement of being connected to the same DSO. This is also mentioned in paragraph 91: *"A Low Voltage Delivery Point Group can only gather low voltage connected Delivery Points, coming from the same DSO and from the same CRM Candidate in one CMU."*

On low voltage levels/in a residential context a high number of small assets will necessarily need to be combined to be able to offer an eligible volume. Adding the restriction that all these small assets need to be connected to the same DSO appears to be a heavy restriction on the effective participation on low voltage, and appears to be inconsistent with the rules of Annex C.4.

- Baselineing: with respect to Annex C.2 (point 18.3.2 of the modified FR), NOVEN believes that for low voltage level assets specifically it is useful if other baselining methodologies (last QH or baseline nomination) would also be allowed.

Feedback to the public consultation on Synergrid Flex doc release 2

Thermovault welcomes the opportunity given by Synergrid to react to the updated version of Flexibility document release 2. Moreover, Thermovault is pleased to observe the willingness to open the CRM and aFRR products to low voltage capacities and the pragmatism put forward with simplification of prequalification & data exchange processes. This is clearly a first good step towards the unlocking and integration of residential flexibility sources into the market.

The present document summarizes most problematic (according to Thermovault) design elements put forward by Synergrid with a specific focus on requirements around low voltage capacities. Moreover, it repeats some of the concerns highlighted in Thermovault's feedback to ELIA's CRM public consultation as it was not clear to us how the interaction between ELIA and DSOs on both public consultations would be handled.

aFRR low voltage

With the proposed set of rules, Thermovault fears that only a very limited number of flexible assets will effectively participate in the aFRR product. It concerns Thermovault as it does not seem at all to match the need for additional flexibility sources highlighted by ELIA in its most recent Adequacy and Flexibility study - in which ELIA expects significant contribution of low voltage flexibility sources as of 2025 – nor the true potential of low voltage assets.

Furthermore, Thermovault wonders what to expect in terms of additional low voltage aFRR design revisions in the coming years. Indeed, as no clear common roadmap is established (or communicated?) by Synergrid yet, it looks like the proposed aFRR LV fast-track design consists only of this unique step and no additional actions are clearly planned to further facilitate the integration of low voltage assets into the aFRR product.

Thermovault therefore urges Synergrid to take its responsibilities by building a pragmatic step by step implementation plan in parallel to the ongoing (absence of) political alignment and the standstill that will most probably result from the coming elections. Such a plan should obviously put forward realistic solutions that lift the limitations listed below and go together with a **reasonable timing** (unlike the current basic evolution which will in the end take more than a year to be implemented (if not once more delayed) and will attract limited additional volume of flexibility).

1) Obligation for an FSP to obtain an opt-out agreement with the supplier/ BRP

The only possibility to offer low voltage flexibility into the aFRR product by end 2024 is conditioned on the obtention of an opt-out agreement with the related suppliers/ BRP. Thermovault would like Synergrid to understand how unbalanced this requirement is for new (small) market parties. Unlike the current Transfer of Energy law – where a fallback involving CREG exists to cover situations where no agreement can be found between a

BSP and the Supplier / BRP – there is no other solution to participate to aFRR than to sign this opt-out agreement. This puts the FSP into a very delicate negotiation position towards the BRP/Supplier and will most probably lead to an absence of participation to aFRR low voltage.

Extending the current transfer of energy mechanism to low voltage assets is obviously not answering Thermovault's concern in the short term as it requires SMR3 requirement (see point 2 below). As a possible solution, Thermovault refers to the point 4 below.

2) Prerequisite to have SMR3 regime implemented on the head meter.

Thermovault does not question the long term vision to have SMR 3 regime implemented in a majority of households, nor to have this imposed as a condition to deliver any flexibility product. On the contrary, Thermovault is as convinced as Synergrid that this 15-min granularity will become the new reference and should be supported accordingly.

However, Thermovault cannot accept that Synergrid limits the access to most flexibility markets in 2024 by imposing such preconditions. Indeed, latest numbers published on VREG-website (end 2023) show that only 1.78 % (~ 30 000) of all households with digital meters in Flanders are today shifted to the SMR3 regime. This number goes close to 0 for Brussels & Wallonia.

Thermovault cannot be held responsible for the speed at which the transition towards digital meters is being handled in each region, nor for the switch to SMR3 regime. It can only observe the absence of empowerment with regards to this specific objective and share its concerns. Indeed:

- DSOs have no obligation nor incentive today to organize a massive shift to SMR3 (the only commitment they have is to support the shift towards the digital meter (which then stays in SMR1 regime) and are obviously facing IT challenges which limit the effective number of digital meters than can be accepted with the SMR3 regime on the short term;
- Suppliers are not yet offering dynamic contracts which would require 15 minute data and therefore a SMR3 regime (on the opposite, Thermovault observes the comeback of fixed contracts and the end user rush towards these products); and
- End users are getting charged (extra cost for Fluvius to handle the data); while being most of the time exposed to negative consequences of monthly energy invoices (with extreme amounts in winter time, not a spread amount over 12 months anymore).

In this context, **Thermovault does not believe it is realistic to condition yet the participation of LV aFRR to SMR 3 regime if the objective is to unlock significant volumes of low voltage flexibility.**

3) End of transition period allowing virtual centralized gateways

Thermovault understands that from the beginning of 2025, there will be no other real time communication option than connecting directly local gateways to the RTCP platform. In other words, the alternative based on virtual centralized gateways is not acceptable anymore. Could Synergrid justify why the local gateway requirement is imposed, why the virtual centralized gateway cannot be considered as a valid solution anymore (especially when looking at residential level) and confirm that a similar transition period will be required for low voltage assets (that have not taken part to the aFRR product yet)?

4) Possible way forward

Thermovault asks Synergrid to really consider **alternatives that are more aligned to the current reality to start with** (not enough SMR3 yet, even for Flanders) in parallel to **the definition of a realistic implementation plan** that will quickly move a majority of the digital meters (in all regions) to the SMR3 regime.

As concrete source of inspiration to design these alternatives, Thermovault refers to historical DR-product evolutions implemented by ELIA in the years 2013 – 2020 and which started with pragmatic rules (specific mFRR product, ICH / R3 DP, ...) which achieved the main objective to attract significant additional flexibility volumes while positively impacting the total cost to procure reserves. Obviously, these specific frameworks must be limited in time and evolve towards the standard product requirements as soon as market conditions allow it to do so, to guarantee technology neutrality and fair competition between market parties.

CRM

In addition to the points 1 to 6 below which were also shared directly to ELIA in answer to the CRM market rules public consultation but also concerns Synergrid, Thermovault discovered another limitation in the documentation released by Synergrid which seems difficult to understand: the restriction for low voltage to participate to Y-1 auction only. Can Synergrid explain why this restriction is imposed? It is obvious to Thermovault that low voltage assets have an added value to also compete in the Y-4 auction and it would only be fair to allow them to do so, as any other asset connected to medium / high voltage grid.

Feedback already shared with ELIA

1) The restriction to prequalify only as an additional CMU

From the rule described in paragraph 82, Thermovault understands that the possibility to participate in CRM Auction with low voltage delivery points is only allowed if these delivery points prequalify as an Additional CMU.

Thermovault wonders why the access to unproven CMU (in Y-4 auction) is forbidden for these specific delivery points while it remains an option to future capacities connected to the DSO / TSO grid. This goes against the definition of virtual CMU,

which was designed to incentivize a FSP to find new capacities (not known yet at the moment of the auction, typically the case with most of the low voltage capacities), and unfairly penalizes FSPs looking to unlock low voltage capacities.

Furthermore, assuming the VCMU is open to low voltage assets as well, ELIA should then ensure a fair competition for the corresponding volume when it comes to valorization of capacities in consecutive auctions. Indeed, today an existing CMU gets the chance to be contracted in a Y-4 auction (one year contract) and have the possibility to participate in the following Y-4 auction to win another on year contract (for the following delivery period) with the same volume. Such a possibility is not granted for VCMUs today.

2) The limitation to create a CMU with delivery points associated to the same DSO only

Again, a specific and non justified restriction to low voltage capacities is set up by ELIA here and limits the possibilities offered to the FSP to aggregate enough capacity to reach the proposed thresholds. ELIA must understand that the number of low voltage delivery points that are needed to offer an eligible volume in the auction is significant due to the derating factor and to the margin that needs to be taken to ensure the product's availability in the delivery period.

Restricting the composition of this pool of delivery points per DSO will have a direct impact on the total eligible volume that will be able to participate in an Auction, yet seems to have no technical justification.

Furthermore, **such constraint is inconsistent with the rules of Annex C4** (Correction for participation in frequency related ancillary services) where the only way to have such participation considered by ELIA is conditioned to a perfect match between the list of delivery points prequalified in the CMU versus the list of delivery Points prequalified in the balancing service.

Such a match will remain theoretical (and therefore triggers the question of fair competition and correct verification of the service availability) unless the freedom is given to the FSP to build a CMU with delivery point independent of the corresponding DSO behind.

3) The participation of low voltage delivery point is limited to the access point level

Thermovault understood from previous design discussions that the participation of low voltage assets to CRM would be limited to the access point level (the possibility to go to a delivery point level with a submeter would not be granted at first). Could ELIA confirm that this is no longer a limitation, and that participation from submetered

DP is now allowed? it remains unclear from the reading of the functioning rules. It is obvious that if such restriction is enforced there is no residential flex participation anymore: the pollution effect of other non-controllable loads at the residential level will make the verification of the service from the measurements at the access point impossible.

4) The participation of low voltage delivery points is conditioned on the SMR3 regime.

Thermovault understands that one of the preconditions to prequalify a low voltage delivery point is that the access point it is associated with has a digital meter with an active SMR 3 regime. Could ELIA and the DSOs justify why such a regime is needed in the context of CRM? Thermovault always understood that the debate around SMR3 regime was related to the need to correct the BRP behind, and often heard willingness from DSOs and ELIA to relax metering requirements in situations where such correction is not required. According to Thermovault, this is once more an entry barrier to the CRM (seen the low percentage of SMR3 regime today in the market (1,73 % of all smart meters in Flanders, close to 0 in Wallonia & Brussels) that is not justifiable (there is no correction of BRPs in the CRM).

Obviously, 15 minute measurements may be used for settlement purposes and availability monitoring but such measurements should come from **the private submeters** installed at delivery point level, respecting standards set by system operators. Moreover, metering requirements should follow the approach introduced by ELIA on aFRR, with reasonable accuracy requirements imposed at each Delivery Point and stricter accuracy requirements at pool level.

5) The baselining methodology

Thermovault understands that the only way to demonstrate the service availability is based on the baseline methodology “high x of y”. Considering historical measurements as a reliable proxy of what would have been consumed at the moment of control makes no sense when looking at low voltage consumers.

As an alternative, Thermovault suggests to use other baseline methodologies that have been proven effective in the balancing services: last QH or a baseline nomination.

6) The lack of consideration for aggregated requirements

To build a low voltage delivery point group, an FSP needs to include a significant number of delivery points. Some of these delivery points will be added as back up, to give the FSP enough margin to cope with events such as data access failure, move of the end user, ...). In ELIA's current proposal, there is no way for a FSP to indicate

before an AMT-moment which delivery points out of the group are effectively available and will be part of the service delivery on that AMT-moment, and which should not be considered. If all prequalified delivery points are included by default in the availability monitoring, the control's results will be polluted by the effect of the delivery points not participating in the service on that AMT-moment while the service was effectively delivered from the "active" delivery points.

Another example refers to the data exchange requirements that are still determined at delivery point level. In this way, an FSP now gets the obligation to exchange in real time individual 15 min measurements. This obviously has a direct impact on the quantity of data that will be exchanged (and the associated costs) while seems to bring limited added value for the availability monitoring. Thermovault therefore suggests to follow the data exchange approach set up in FCR where the aggregated (pool based) measurements are exchanged with ELIA in real time and the individual data are sent ex post by the FSP. Obviously, with ELIA getting the right to request additional data for audit purposes if needs be.