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
WOM	20231215-Marktgids_FLE	614	E		Nota infra (p68): "...21. Berekend betekent dat de 15’ metingen via een berekening worden bepaald (i.e. virtuele DNB-submeter). Deze berekening wordt enkel ondersteund voor 15’ metingen van balanceringsdiensten (enkel mFRR) en enkel indien het gevraagd flexibel vermogen (mFRR up of mFRR down) boven 100kW ligt. Bovendien zal enkel het restverbruik/restproductie berekend worden (DNB-hoofdmeter minus alle gemeten DNB-submeters). ..." We wensen hiermee benadrukken dat de mogelijkheid om met virtuele meters te werken, i.p.v. altijd overal fysiche meters, voor onze leden een flinke vooruitgang betekent. B.v. bij plaatsing van een aFRR gateway op de betrokken asset en het gebruik van een virtuele meter voor (b.v. mFRR of andere 15' bemeterd flexdienst) de rest dat achter de hoofdmeter staat, zal ze aanmoedingen om deel te nemen aan flexdiensten verlening.	Synergrid thanks WOM for the comment and understands the benefit of working with submeters and virtual meters in the context of the balancing products	N
WOM	20231215-Marktgids_FLEX_v2.0.pdf		E		Nota infra (p68): "...21. Berekend betekent dat de 15’ metingen via een berekening worden bepaald (i.e. virtuele DNB-submeter). Deze berekening wordt enkel ondersteund voor 15’ metingen van balanceringsdiensten (enkel mFRR) en enkel indien het gevraagd flexibel vermogen (mFRR up of mFRR down) boven 100kW ligt. Bovendien zal enkel het restverbruik/restproductie berekend worden (DNB-hoofdmeter minus alle gemeten DNB-submeters). ..." We wensen hiermee benadrukken dat de mogelijkheid om met virtuele meters te werken, i.p.v. altijd overal fysiche meters, voor onze leden een flinke vooruitgang betekent. B.v. bij plaatsing van een aFRR gateway op de betrokken asset en het gebruik van een virtuele meter voor (b.v. mFRR of andere 15' bemeterd flexdienst) de rest dat achter de hoofdmeter staat, zal ze aanmoedingen om deel te nemen aan flexdiensten verlening.	Synergrid thanks WOM for the comment and understands the benefit of working with submeters and virtual meters in the context of the balancing products	N
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EV Belgium	20231215_C8_06_NL_v1	41	T	Synergrid zal een data extrapolatie methode ontwikkelen voor toepassingen op laagspanning.	De data requirements zijn mogelijks te strikt voor laadinfrastructuur, met name in het geval van 'alleenstaande' laadinfrastructuur. Er zou een 'degraded method' moeten kunnen gebruikt worden waarbij de meetgegevens (datapunt per 15/5/1 minuten) via de MID-meter als sub-metering data gebruikt kan worden om zo geëxtrapoleerde data per 4" te bekomen. Tevens zou het moeten volstaan voor een netbeheerder om de real-time 4"-data enkel op een (volledig of minstens hoger) geaggregeerd niveau te verkrijgen dan op laadpuntniveau. Dit op uiteraard voorwaarde dat de werkelijke verbruiksdata achteraf wel wordt aangeleverd.	Het gebruik van 4" data maakt integraal deel uit van het huidige aFRR product, en is ook op die manier beschreven in de T&C BSP aFRR. Elke andere datagranulariteit moet besproken worden in de context van deze T&C BSP aFRR vooraleer ze geïmplementeerd kan worden in de Synergrid documentatie. Elia staat er zeker voor open om dit onderwerp te bespreken met EV Belgium om zo beter de bezorgdheden van EV Belgium te begrijpen en om zo deze bezorgdheden eventueel mee te nemen in toekomstige wijzigingen in de T&C BSP aFRR.	N
EV Belgium	20231215-Marktgids_FLE	0	G		EV Belgium juicht toe dat er werk wordt gemaakt van het creëren van flexibiliteitsdiensten op laagspanningsniveau. De huidige voorstellen zijn echter slechts een eerste stap, en zullen onvoldoende zijn om het potentieel aan flexibiliteit vanuit de EV waardeteken te ontplooien. Daartoe moeten een aantal bijkomende maatregelen worden genomen, die zich voornamelijk situeren op 2 niveaus: - wegnemen van financiële, administratieve en technische drempels voor toegang tot de flexmarkt - vandaag is de markt volledig "BRP centered". - het creëren van een aantrekkelijk businessmodel (voor directe deelname vanuit de EV waardeketen) via bijkomende financiële incentives In dit verband en voor een overzicht van de verschillende knelpunten kan verwezen worden naar het ACER document "Demand response and other distributed energy resources: what barriers are holding them back? 2023 Market Monitoring Report 19 (December 2023)"	Synergrid dankt EV Belgium voor de reactie en het aangeven van deze aandachtspunten. De netbeheerders wensen te duiden dat veel van de zaken die EV Belgium hier aanhaalt zich buiten de scope van de huidige consultatie bevinden.	N
NOVEN NV	20231215-Marktgids_FLE	0	G		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.	Synergrid thanks Noven for their reaction and as evidenced by the roadmap flex, discussed during the stakeholder meetings preceeding the consultation, aFRR LV is the first step among many to open up the flex market to low voltage participiation.	N
NOVEN NV					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 reevaluate this element in the framework of this public consultation and to propose other solutions (such as a supply split at the residential level).	Synergrid understands the complexity linked to the opt-out mechanism and would like to refer to the study which is ongoing on the possible implementation of a Transfer of Energy mechanism for low voltage and medium voltage connected assets. An answer to the barrier identified by Noven is investigated within this study and will be considered as part of the scope for the next document release.	R
NOVEN NV					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.	Synergrid is happy to clarify that this a misunderstanding, as the intent is that low voltage assets can participate in all relevant CRM auctions. In order to clarify this point, the text has been amended as follows: "Punten aangesloten met spanning < 1 kV kunnen toegevoegd worden aan de Pool van de FSP vanaf mei 2024."	A
NOVEN NV					Secondly, NOVEN briefly reiterates the points it submitted to Elia with the request to re-evaluate them in the framework of the public consultation:	Synergrid thanks Noven for listing their remarks	N

NOVEN NV	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.	Synergrid understands the comments raised and would like to refer to the fact that the metering of capacities connected to the low voltage Grid represent important implementation & technical challenges which seem impossible to be implemented against the next PQ Process. Synergrid is investigating possible submetering solutions and will return to market parties when a clear view has been established.	N
NOVEN NV	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.	Synergrid understands NOVEN's comment and agrees with the fact that that all capacities should have the same possibilities to participate to the PQ Process. Synergrid wants to clarify that the goal of the proposal was not to exclude capacities to prequalify as Unproven.	A
NOVEN NV	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.	Synergrid understands NOVEN's comment but would like to highlight the fact that DSOs are the entities making the calculations for capacities connected on their own respective grids. Therefore, roles and responsibilities for such calculations should the low voltage delivery points coming from different DSOs belong to the same Low Voltage Delivery Point Group are unclear and mixed and the legal basis for them is questionable.. Although this would probably be technically feasible, it remains unclear which DSO would then be responsible for the final calculation of the Low Voltage Delivery Point Group. Calculations are impacting for the Prequalification of low voltage capacities but also potentially later during the Pre-delivery control process and especially during the Delivery Period for which a monitoring of the capacities will be conducted. In case of spotted missing capacity during the availability monitoring, the targeted capacity may be liable to penalties. If the calculation is not done in a proper way initially, it may trigger penalties and contestation discussions which would be avoided if calculations are kept on an unique DSO base for each Low Voltage Delivery Point Group. Moreover, aggregation will already lie at the core of the successful participation of low voltage capacities to the CRM since they should reach the minimum participation threshold set by the Electricity Act to participate to the CRM. Having Low Voltage Delivery Point Groups linked each to a different DSO does not prevent such capacities to join the CRM. Finally, Synergrid would like to point out that the needs in terms of calculation aren't the same in the CRM and in the Balancing world. This justifies the differentiation of concepts used for both worlds.	N
NOVEN NV	Baselining: 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.	The choice of baseline is part of the CRM Design and should be discussed in the context of the function rules drafted by ELIA.	N

Flux50	20231215-Marktgids_FLE	0	E	Zie de commentaren en opmerkingen in de bijgevoegde excellijst.		Synergrid dankt Flux50 voor de ingediende reactie.	N
Flux50	20231215-Marktgids_FLE	0	E	Zie bijgevoegde excellijst.	Pagina Sectie Content Opmerking P.18 2.2 Begrippen en Terminologie Voetnoot 3 ivm CRM de link is niet correct in de voetnoot P.19 2.2 Begrippen en Terminologie Tabel 2: Distribution) Grid User ((Distributie-)netgebruiker) De afkorting DGU wordt in het document gebruikt, maar is niet in tabel terug te vinden: is dit een synoniem voor (D)NG? Graag dan beide afkortingen vermelden of consequent één afkorting gebruiken in figuren en in tekst. P.22 2.2 Begrippen en Terminologie "De begrippen Aansluitingspunt, Leveringspunt, Service Delivery Point Flex, Eindpunt en Gateway Figuur 2, 3, 4" 1. De termen dienen consequent in dezelfde taal gebruikt te worden in de tekst en in de figuren. (bv aansluitingspunt versus connection point,). 2. In de figuren wordt ook het begrip SDP Supply Primary getoond maar dit staat niet vermeld in de tekst. 3. In de tekst wordt P.22 2.2 Begrippen en Terminologie Begrip Gateway versus Gateway Endpoint, Tabel 2, versus Gateway Model Point (pag 44) In de tabel wordt het begrip Gateway beschreven, terwijl in de figuren verwezen wordt naar het begrip 'Gateway Endpoint'. In procesbeschrijving 4.2.6 wordten nog andere termen gebruikt zoals Gateway model point en worden gateway en endpoint apart gebruikt... P.22 2.2 Begrippen en Terminologie Begrip Eindpunt en figuren 2,3,4 Op de figuren is het begrip 'Eindpunt' niet toegelicht: het is dan ook niet duidleijk hoe dit zich verhoudt tov de andere begrippen die wel in de figuren worden toegelicht. P.22 2.2 Begrippen en Terminologie Begrip SDP Supply Primary - tabel 2/Figuur 2,3,4 Begrip SDP Supply Primary komt niet voor in de tabel, maar wordt wel in de figuren getoond P.23 2.2 Begrippen en Terminologie rol databeheerder wie wordt bedoeld met de 'rol databeheerder'? Wie kan deze rol opnemen?. Het kan nuttig zijn te verwijzen naar de documentatie van de Flex-platform waar dit wordt toegelicht. P.26 2.3.3 Contracten tussen marktpartijen Begrip DNB versus DSO, Figuur 6 en verder in document (bv ook figuur 7,...) In de tekst onder 2.3.2.2 en in de tabel van begrippen wordt het begrip DNB (netwerkbeheerder) gebruikt, maar in meerdere figuren wordt het begrip DSO gebruikt: dit is verwarrend- als deze volwaardig als synoniemen gebruikt kunnen worden, is het aangewezen dit in de tabel 2 van de begrippen te verduidelijken P.32 4.2 DNB Prekwalificatie FSP kan controleren of levering geen congestie veroorzaakt? Is het niet de DNB die controleert of de levering van flexibiliteit geen congestie veroorzaakt? P.34 4.2.1 Ondertekening FSP-DNB contract regionale verschillen suggestie om verwijzing toe te voegen door welke overheidsinstelling deze vergunning verleend wordt- referentie doucment, website	p. 18 - 2.2: de link in het document werkt en lijkt ook naar de juiste info te verwijzen. P. 19 - 2.2: afkorting DGU is toegevoegd aan de lijst met afkortingen. P. 22 - 2.2: de begrippen zijn ook in het Engels toegevoegd aan het document p. 23 - 2.2: de rol databeheerder zoals beschreven is in het Energiedecreet. p.26 - 2.3.3: DNB vs DSO -> DSO is toegevoegd aan lijst met afkortingen. p.32 - 4.2: FSP idd vervangen door DNB p.34 - 4.2.1: bedankt voor deze suggestie, dit behoort echter niet tot de scope van de MG Flex en zullen we dus niet opnemen in het document.	N/A/R

Flux50	20231215-Marktgids_FLE	0	E	Zie bijgevoegde excellijst.	P.36 4.2.3 Net Flex Study: verwijzing naar tabel 3.1? Moet tabel 3 zijn ipv 3.1? P.52 4.3.4 Beëindiging dienst: De FSP kan de beslissing van de DNB betwisten. Bij welke instantie worden betwistingen neergelegd- bij uitbreiding: is dit van toepassing op alle processen: is er voor alle processen één partij waar men problemen kan melden? P.57 4.3.5 Bepalen Nominaal Referentievermogen: Figuur 16 Procesverloop: Determine Nominal Reference Power: is er na 'Determine Final Nominal Reference Power' ook geen uitsplitsing nodig om rekening te houden met additional delivery points zoals erboven: een bijkomende activiteit nodig voor 'all additional delivery points: Send Declared Final Nomainal Refernce Power? P.58 4.3.5 Bepalen Nominaal Referentievermogen: Uitzonderingen: als de DNG gebruik maakt van de versnelde procedure hoeft hij niet aan de voorwaarden te voldoen: Welke versnelde procedure wordt hier bedoeld? En welke voorwaarden zijn niet geldig: als er geen service delivery point is geregistreerd: hoe kan men dan de NRP bepalen? P.65 5.2.2 DNB in kennis stellen van activering: Scope: producten: Er staan drie producten vermeld met : , maar er is geen verdere uitleg gegeven hoewel het lijkt dat hier een beschrijving moet volgen. p.86 10.3 Toewijzen SDP-Flex: Procesbeschrijving: proces begint wanneer de FSP een verzoek verstuurt om een SDP flex oe te wijzen aan een LSDeliverby Point Group: In figuur 24 staat de DSO als de partij die aan wie het verzoek wordt gericht en die dit verzoek registreert: dit zou ik dan ook in de procesomschrijving vermelden dat de DSO hier een rol in speelt (aangezien dit anders is dan bv in proces 10.2: creatie van de groep- p.88 10.3 Toewijzen SDP-Flex: Het aanmaken van een SDP-Flex en het toewijzen van een SDP-Flex kan in 1 verzoek worden aangevraagd. Indien afzonderlijk, moet eerst het aanmaken van de SDP-Flex worden aangevraagd: vermeld het procesnummer voor het proces 'aanmaken van een SDP-Flex p.93 12. Monitoring gegevenskwaliteit (SLA): overzicht SLA- referentie; e vinden in Error! Reference source not found.: is dit hetzelfde als 'overzicht intake gegevenskawliteti 'p.81)- bijlage 4? Indien ja, dezelfde benaming gebruikten p.96 Bijlage 4 overzicht inzake gegevenskwaliteit: Uitzondering voor laagspanning: totdat de operationele processen in de tabel hieronder volledig zijn geautomatiseerd, worden de service level agreements alleen uitgevoerd op een best effort basis voor laagspanningsleverpunten: Wat is de status van de automatisatie van deze processen? Indien ze allemaal niet 'volledig' geautomatiseerd zijn, betekent dit dat er geen SLA's van toepassing zijn? (in dat geval kan men niet spreken over SLA's-, dan is er geen agreement)	p.36 - 4.2.3: de verwijzing in de tekst is aangepast naar de betreffende paragraaf. p.52 - 4.3.4: de volgende tekst is toegevoegd: zoals bepaald in het FSP-DNB-contract p.57 - 4.3.5: Nee, dit is niet nodig want het wordt geaggregeerd doorgestuurd. p.58 - 4.3.5: Zie tabel met begrippen -> Versneld prekwalificatieproces. p.65 - 5.2.2: Oplijsting vervangen door verwijzing naar de overzichtstabel p.86 - 10.3: "naar de DNB" toegevoegd -> "...wanneer de FSP een verzoek verstuurt naar de DNB om een SDP-Flex ..." p.88 - 10.3: verwijzing naar paragraaf 4.3.2 toegevoegd p.93 - 12: error vervangen door link naar Bijlage 4. p. 96 - bijlage 4: De processen voor LV zijn nog niet geautomatiseerd. De SO's zullen er alles aan doen om de SLA's ook voor LV te respecteren of minstens te benaderen. Gelet op de onzekerheid van het aantal aanvragen op LV, kunnen de SOs zich echter niet engageren op behalen van alle SLA's.	
Bnewable NV	20231215_c8-01-nl-v14.p	0	G	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.	Synergrid thanks Bnewable for their participation in the consultation, and for providing your remarks. The system operators wish to stress that it is indeed their aim to facilitate the flex market through the targeted removal of barriers.	N
Bnewable NV				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).	The MG flex is applicable to all points connected to a DSO-grid.	N	

Bnewable NV				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.	The capacity of the connection is not "ensured" in the sense that the distribution grid is not dimensioned to simultaneously support the connection capacity of all attached grid users. This is neither needed nor economically viable. In this respect, the Flemish grid code specifies in article 1.2.1 §2 that the DSO needs to do what is reasonably possible to avoid interruption of the grid access. Article 5.2 of the connection agreement (aansluitingsreglement) explicitly mentions that the grid design is based on statistical assumptions about the non-simultaneity of offtake and/or injection behaviour of connected grid users. In addition to providing this clarification, our primary objective is to streamline the (NFS) prequalification process and implement a straightforward grid protection mechanism with minimal complexity. This aligns with feedback received from other market participants, and Synergrid is dedicated to addressing these concerns. For instance, we aim to develop automated risk indicators that activate only when there is operational grid risk at specific times and locations, a capability that is not available with each system operator.	R
Thermovault	20231215_Guide_marché	0	G	Voir réaction attachée en pièce jointe	Voir réaction attachée en pièce jointe	Synergrid remercie Thermovault pour la réaction.	N
Thermovault					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.	The SOs thank Thermovault for the comment, and also for their itemized feedback. Specific responses are provided in response to specific feedback received.	N
Thermovault					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.	The SO's elect to follow a step by step approach, consisting of different document releases. The focus of this document release is on aFRR & CRM LV as well as reducing the barriers on this voltage level	N
Thermovault					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.	In order to address this comment, Synergrid will organise a PDG where a high level flexibility roadmap will be shared with the market participants.	N
Thermovault					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).	In order to address this comment, Synergrid will organise a PDG where a high level flexibility roadmap will be shared with the market participants.	N

Thermovault	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.	Synergrid understands the complexity linked to the opt-out mechanism and would like to refer to the study which is ongoing on the possible implementation of a Transfer of Energy mechanism for low voltage and medium voltage connected assets. An answer to the barrier identified by Noven is investigated within this study and will be consider as part of the scope for the next document release.	N
Thermovault	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.	See Synergrid answer from Doc Release 1 with regards to the need for SMR3 and the regional differences. Besides that we would also like to make following remarks: •In October '23 IT improvements have been implemented at Atrias side (DEX-platform) to tackle potential performance risks if the number of SMR3 activations would steeply increase. So, that is not an issue anymore. •The SMR3 regime is indeed a prerequisite for a dynamic contract, but the opposite is not true. A customer without a dynamic contract can perfectly request the activation of SMR3 through his supplier. •Indeed, there is small extra cost for SMR3 in Flanders, but this is only 1,12 EUR per year (excl. TAV). •SMR3 does not necessarily mean that the energy invoice is on a monthly base. This will depend on the configurations offered by the specific DSOs, but at least in Flanders a customer with SMR3 still has the option to choose between yearly and monthly energy invoices.	N
Thermovault	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)?	There exists a regional constraint in Wallonia for the DSO to collect the data from private devices. As far as the system operators are concerned, the Central gateway as a permanent solution is the ambition, however to implement this the roles and responsibilities of each party need to be clarified. To respond to the questions of the FSPs an extension central gateway to 2026 has been proposed.	N
Thermovault	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.	It is Synergrid's intention to work with progressive document releases to open markets, and also to progressively refine requirements. Synergrid also plans to organise a PDG meeting to show a high level flexibility roadmap to market parties.	N

Thermovault	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.	Synergrid is happy to clarify that this a mistunderstanding, as the intent is that low voltage assest can participate in all relevant CRM auctions. In order to clarify this point, the text has been amended as follows: "Punten aangesloten met spanning < 1 kV kunnen toegevoegd worden aan de Pool van de FSP vanaf mei 2024."	A
Thermovault	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.	Synergrid understands Thermovault's comment and agrees with the fact that that all capacities should have the same possibilities to participate to the PQ Process. Synergrid wants to clarify that the goal of the proposal was not to exclude capacities to prequalify as Unproven.	A

Thermovault	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.	Synergrid understands Thermovault's comment but would like to highlight the fact that DSOs are the entities making the calculations for capacities connected on their own respective grids. Therefore, roles and responsibilities for such calculations should the low voltage delivery points coming from different DSOs belong to the same Low Voltage Delivery Point Group are unclear and mixed and the legal basis for them is questionable. Although this would probably be technically feasible, it remains unclear which DSO would then be responsible for the final calculation of the Low Voltage Delivery Point Group. Calculations are impacting for the Prequalification of low voltage capacities but also potentially later during the Pre-delivery control process and especially during the Delivery Period for which a monitoring of the capacities will be conducted. In case of spotted missing capacity during the availability monitoring, the targeted capacity may be liable to penalties. If the calculation is not done in a proper way initially, it may trigger penalties and contestation discussions which would be avoided if calculations are kept on an unique DSO base for each Low Voltage Delivery Point Group. Moreover, aggregation will already lie at the core of the successful participation of low voltage capacities to the CRM since they should reach the minimum participation threshold set by the Electricity Act to participate to the CRM. Having Low Voltage Delivery Point Groups linked each to a different DSO does not prevent such capacities to join the CRM. Finally, Synergrid would like to point out that the needs in terms of calculation aren't the same in the CRM and in the Balancing world. This justifies the differentiation of concepts used for both worlds.	R
Thermovault	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.	Synergrid refers to its comment on the SMR3 regime. Moreover, Synergrid would like to add that metering requirements will be needed during the Delivery Period in case low voltage capacities are willing to participate to balancing services. Indeed, when monitoring capacities from the CRM, Elia will take into account their participation in balancing services. In order to account in a correct way (without the potential polluting effects mentioned) for such participation in the monitoring process of the CRM, submetering requirements will be needed.	N

Thermovault	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.	Synergrid understands the comments raised and would like to refer to the fact that the metering of capacities connected to the low voltage Grid represent important implementation & technical challenges which seem impossible to be implemented against the next PQ Process. Synergrid is investigating possible submetering solutions and will return to market parties when a clear view has been established.	N
Thermovault	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.	The choice of baseline is part of the CRM Design and should be discussed in the context of the function rules drafted by ELIA.	N

Thermovault				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.		Here, Synergrid would like to answer that the goal is to treat low voltage capacities in the same way as other types of capacities participating to the CRM. Therefore, Synergrid would like to remind that capacities going through the Prequalification Process can decide to opt-out for part of their capacity for they decide not to participate to the CRM and end up contracted in the auction. The ability to opt-out is also a way to reduce the risk taken by the capacity participating to the CRM by reducing its commitment in the CRM for which it will participate to the Auction. If the amount of capacity prequalified and auctioned by the CRM Candidate is right, he will be able to meet his requirements in terms of monitoring during the delivery period. Synergrid understands that this is likely to trigger important data exchanges for low voltage capacities participating to the CRM. However, Synergird would like to insist on the fact that it seems to be the unique way of assessing the real contribution of such capacities in the right way when monitoring in the CRM since injection and offtake are considered with opposite signs during the calculation of the availability monitoring. Having injections and offtake connected on low voltage level would then lead to misleading aggregated calculations of the contributions offered by the CMU as a whole in the CRM. Since Elia intends to treat low voltage in the same way as other capacities, Synergrid is not keen to develop an additional methodology of assessing capacity for a specific type of capacity willing to participate to the CRM.	N
FEBEG	20231215_Guide_marché	0	E	La note de position globale se trouve en annexe. Si celle-ci ne peut être prise en compte, la FEBEG l'adaptera au format de consultation requis.			Synergrid remercie FEBEG pour la réaction.	N

FEBEG		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.	The SO's thank FEBEG for sharing their concerns.	N
FEBEG		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.	Synergrid would like to refer to the study which is ongoing on the possible implementation of a Transfer of Energy mechanism for low voltage and medium voltage connected assets. The points raised by FEBEG are in scope of this study and will be consider for the next document release.	N
FEBEG	MG Flex	§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?	Text is clarified: it's only about flexibility services (services like energy sharing are excluded, not relevant) and the FSP is only responsible for the combination of its own flex services for the same access point. "De DNB controleert niet of de dienst kan worden gecombineerd met bestaande flexibiliteitsdiensten van dezelfde FSP op het Aansluitingspunt, aangezien dit de verantwoordelijkheid van de FSP is."	A
FEBEG	MG Flex	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.	The system operators agree that this is indeed possible, but we expect the FSP to manage this in their relation with the grid user: the primary action is between FSP and grid user, this is only a fall back check. Grid user has to inform supplier in supply market, and FSP in flex market.	N
FEBEG	MG Flex	§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.	The system operators agree that this is indeed possible, but we expect the FSP to manage this in their relation with the grid user: the primary action is between FSP and grid user, this is only a fall back check. Grid user has to inform supplier in supply market, and FSP in flex market.	N

FEBEG	MG Flex	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.	Individual data is required per delivery point to ensure sufficient data quality. In addition this data may be used in the future to allow to properly allocate the impact of an activation to the responsible BRP and Supplier and to correct the impact of a test activation on the tariffs of the end consumer. Working at the level of individual delivery points however introduces complexity in energy bidding of the FSP (large number of delivery points should be added in each energy bid) and activation control of the TSO. In order to simplify this the aFRR Low voltage delivery point group has been introduced. The FSP can define which	N
FEBEG	MG Flex	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 zin 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).	The data is sent on individual delivery point data and is available to both FSP and FRP at this level if required. The aggregation is a facilitation for the processes of the FSP and FRP to avoid having to handle a significant number of delivery points during bidding and processing of activation control. It remains unclear how the aggregation of data by the DSO in the Flexhub influences the cost for the B2C segment. The sending of individual data per delivery point for the participation to aFRR is a requirement from the FSP contract aFRR. In addition, the data at individual delivery point may be used in the context of a transfer of energy solution (when implemented).	N
FEBEG	MG Flex	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.	Synergrid thanks FEBEG for their remark. There is currently no legal basis to do this, and therefore this is not a task of the DSOs. This questions touches on to which extent the costs surrounding flexibility should be socialised, but that is a political discussion.	N
FEBEG	MG Flex	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.	The existence of a ToE agreement (ToE, opt-out, pass through) between FSP, BRP and Supplier is verified during onboarding of a delivery point and monitored when the supplier or BRP of a Delivery Point changes. In case no agreement is registered with ELIA, the Delivery Point is rejected/removed from the service. The communication of which customers are participating to flex to the utilities should be treated in the ToE rules of ELIA and is out of scope of this consultation	N
FEBEG	MG Flex	§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?	This is indeed correct.	N

FEBEG	MG Flex	"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)?	- The SLA on pool update execution is included in Annex 4 of the MG Flex. - The impact of a move/switch/... is described in 4.4. When this has as a result that the SDP-Flex is ended, it will automatically also end in the Delivery Point Group to which it belongs. No manual intervention is needed. - For the comment regarding the (re-)certification in case of changes in the pool volume, and at what pace (for every MW or another approach), we refer to the T&C of the relevant Elia product.	N
FEBEG	C8/06	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 & e hierboven), is de finale vereiste. Een overgangsperiode 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.	In order to address this concern, which has been articulated by multiple market parties, the degraded mode of centralised gateway is extended to 31/12/2026. As mentioned earlier, the members of Synergrid are also investigation a permanent solution which would permanently enable a central gateway. The data communication requirements not in scope of this consultation, but part of T&C BSP aFRR of Elia.	N
FEBEG	C8/06	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.	All three solutions (both versions of the local gateway as well as the central gateway) in the C8/06 are possible. In case of a central gateway, multiple SDP's can use the same gateway connection. The text has been updated to clarify this and remove the contradiction. Also note that the throttling only applies to the local gateway setups and not to the central gateway setup	N
FEBEG	C8/06	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.	Thank you for the comment	N
FEBEG	C8/06	§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.	Thank you for the comment, the goal is to open up flex on LV now, further industrialisation and streamlining will be included in further document releases.	N
FEBEG	C8/06	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…	Thank you for the comment, the goal is to open up flex on LV now, further industrialisation and streamlining will be included in further document releases.	N

FEBEG	C8/06	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.	Remark on Baseline: current description is as follows: - DPBaseline: Het vermogen (in MW) dat het leveringspunt zou hebben geïnjecteerd/verbruikt zonder activering van een aFRR-dienst. - MeasureTimestamp: De datumtijd waarop de momentopname van de Pmeasured wordt genomen. De Pbaseline in dit bericht vertegenwoordigt de waarde voor deze tijdstempel + 1 minuut in de toekomst. => the description for DPBaseline is adapted as follows: ", voor de tijdstempel in het veld MTS – Measure Timestamp + 1 minuut"	A
FEBEG	C8/06	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.	If some Gateways are infected by a virus / attack and that this results to the generation of a huge number of messages to the RTCP, we need to easily distinct which Gateways are affected in order to block them. These messages can have an impact on the whole platform if no action is undertaken. In order to block a limited set (and not all GW of a BSP for example), we need to know which Firmware and Software version is used. In this information is perceived as confidential, the only action possible is to revoke all Gateways of a BSP in case of malfunctioning / issue with 1 or some Gateways.	N
FEBEG	C8/06	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.	3) This requirement was set to ensure that no data will be lost in case of: o Gateway losing connection (not stable 4G / Wi-Fi connection, …) o RTCP has an issue (in case of long WE, up to 5 days to solve the issue) We commit to investigate further in next market guides on how to remove barriers.	N
FEBEG	C8/06	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.	Noted, 90 days requirement might be relaxed in future document releasess, based on experiences of this go live. Goal is to keep harmonised processes for all voltage levels.	N
FEBEG	C8/06	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.	Noted, only security SPOC of FSP only receives info, so no DSO or TSO access to that info.	N
FEBEG	C8/06	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?	If no 4" data => no measurement => no activation. Messages are expected in real-time. According to T&C of Elia, if the communication problem is on FSP side, lack of data is considered as no measurement, and so as no activation. If the error is on the side of Elia, the affected time period is excluded from the activation control period.	N
FEBEG	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?	Visualization of congestion zones is a concept being developed by each SO/Synergrid. Currently, there is typically no congestion in an LV area, so this will remain green for a while.	N
FEBEG	C8/01	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.	We agree with this comment. The maximum service level agreement (SLA) is stated in the market guide's flexible section under NFS. In practice, the time taken to complete the process is shorter and we make sure to keep it as fast as possible.	N

FEBEG	C8/01	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.	Thank you for the comment, the goal is to open up flex on LV now, further industrialisation and streamlining will be included in further document releases.	N
FEBEG	C8/01	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.	At low voltage, the NFS will be automated. Today, there are no associated costs billed by the system operators (similar to energy sharing).	N
FEBEG	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.	The remuneration and penalties are defined in the T&C BSP aFRR. In the contract it is defined that in case a delivery point is missing data for a 4" period, the Delivery Point is not considered in the activation control (unless the error is on the side of Elia, then the affected time period is excluded from the activation control period).	N
FEBEG	DNB-FSP agreement	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.	Thank you for the comment. The concern of FEBEG is noted.	N
FEBEG	DNB-FSP agreement	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.	The terminology has been adapted in the FSP-DSO agreement, in accordance with the Market Guide.	A
FEBEG	Excel files	FEBEG has no major issues with the proposed excel files.	Thank you for the comment & thoroughly reviewing all files.	N
FEBEG	General - Conclusion	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.	Synergrid thanks Centrica for their remarks. 1. It is the ambition of the system operators to open up the low voltage flexibility market in a quick manner. Progressive document releases will open up new products as well as streamline existing processes based upon accrued experience. 2. The system operators have decided to prioritise having a fully functional low voltage flex market, where all flexibility products are available, for one FSP per headpoint. Multiple FSP solutions are not on the planning of the system operators for the coming two years.	N
Centrica		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.	Synergrid is pleased to note that Centrica has the ambition to participate in the low voltage flexibility market.	N
Centrica		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.	Thank you for clearly communicating your priorities	N
Centrica		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.	Thank you for clearly communicating your priorities, steps are being taken to streamline metering.	N

Centrica	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.	We thank Centrica for this remark. As noted in our reactions to similar comments, this document release is intended as the first step in opening up the low voltage flexibility market. Based on experience gained with the aFRR LV product, further refinements are possible in further document releases.	N
Centrica	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.	The SO's thank Centrica for the feedback, and are happy to note that the effort undertaken to streamline participation are well-received by Centrica.	N
Centrica	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. 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.	The system operators would like to point out that the difference between the products is because they are fundamentally different products (for instance, aFRR is a power product, while mFRR is an energy product). Furthermore, the system operators are of the opinion that the metering requirements put forward are standard metering requirements which are competitive, and also used by the TSO and the DSO's. Should Centrica be convinced that these requirements constitute a barrier, Synergrid welcomes more information on this topic, and these requirements could be adapted in future document releases. Where 1) is concerned, the system operators feel that using activated energy as a basis for the requirements is not realistic, as this would lead to unstable constraints: the activated power might fluctuate throughout the delivery period, which would then also mean that the metering requirements would fluctuate throughout the delivery period. On the second point, the use of 4" data is an integral part of the current aFRR product and is set forth as a requirements in the T&C BSP aFRR of ELIA. Any other granularity of data should be discussed in the context of the T&C BSP aFRR before it can be implemented in the Synergrid documentation. ELIA is happy to discuss this with Centrica in the context of a possible future amendment to the T&C BSP aFRR. Where the third point is concerned, the system operators understand Centrica's concern and are happy to confirm that such a detailed procedure is currently being investigated by the relevant SO, and that this will be explained to market parties before the go live.	N

Centrica		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.	In order to address this concern, which has been articulated by multiple market parties, the degraded mode of centralised gateway is extended to 31/12/2026. As mentioned earlier, the members of Synergrid are also investigation a permanent solution which would permanently enable a central gateway. The data communication requirements not in scope of this consultation, but part of T&C BSP aFRR of Elia.	N
Febeliec	General	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.	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.	N
Febeliec	MG Flex	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.	The SO's are looking forward to the planned talks with Febeliec and Febeliec's CDSO-members to discuss CDSO provisions related to flexibility. 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	MG Flex	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.	The SO's are looking forward to the planned talks with Febeliec and Febeliec's CDSO-members to discuss CDSO provisions related to flexibility. 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	MG Flex	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).	The SO's are looking forward to the planned talks with Febeliec and Febeliec's CDSO-members to discuss CDSO provisions related to flexibility. 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	MG Flex	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.	The SO's are looking forward to the planned talks with Febeliec and Febeliec's CDSO-members to discuss CDSO provisions related to flexibility. 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	MG Flex	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).	The SO's are looking forward to the planned talks with Febeliec and Febeliec's CDSO-members to discuss CDSO provisions related to flexibility. The issue of calculated meters for CDSOs can certainly be discussed there. 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	MG Flex	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 are looking forward to the planned talks with Febeliec and Febeliec's CDSO-members to discuss CDSO provisions related to flexibility. 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	MG Flex	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 consumer 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 for this category, and should according to Febeliec be extended to all voltage levels and all regional and federal public grids.	The SO's thank Febeliec for their input. Related to the NFS, our primary objective is to streamline the (NFS) prequalification process and implement a straightforward grid protection mechanism with minimal complexity. This aligns with feedback received from other market participants, and Synergrid is dedicated to addressing these concerns. For instance, we aim to develop automated risk indicators that activate only when there is operational grid risk at specific times and locations, a capability that is not available with each system operator.	N
Febeliec	MG Flex	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 are looking forward to the planned talks with Febeliec and Febeliec's CDSO-members to discuss CDSO provisions related to flexibility. 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	MG Flex	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	MG Flex	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 are looking forward to the planned talks with Febeliec and Febeliec's CDSO-members to discuss CDSO provisions related to flexibility. 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	MG Flex	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 are looking forward to the planned talks with Febeliec and Febeliec's CDSO-members to discuss CDSO provisions related to flexibility. 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	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.	The SO's are looking forward to the planned talks with Febeliec and Febeliec's CDSO-members to discuss CDSO provisions related to flexibility. 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. Where the NFS is concerned, our primary objective is to streamline the (NFS) prequalification process and implement a straightforward grid protection mechanism with minimal complexity. This aligns with feedback received from other market participants, and Synergrid is dedicated to addressing these concerns. For instance, we aim to develop automated risk indicators that activate only when there is operational grid risk at specific times and locations, a capability that is not available with each system operator.	N
Febeliec	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.	The SO's are looking forward to the planned talks with Febeliec and Febeliec's CDSO-members to discuss CDSO provisions related to flexibility. 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	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.	The SO's are looking forward to the planned talks with Febeliec and Febeliec's CDSO-members to discuss CDSO provisions related to flexibility. 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