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Response Public Consultation on the Terms and Conditions for balancing service providers for manual Frequency Restoration Reserve (mFRR) (“T&C BSP mFRR”).

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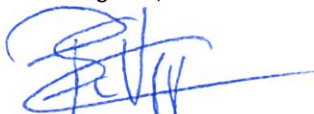
Dear Madam/Sir,

We refer to the public consultation **the Terms and Conditions for balancing service providers for manual Frequency Restoration Reserve (mFRR) (“T&C BSP mFRR”)** and want to thank you for the granted opportunity to provide feedback.

Our remarks focus on non-contracted reserves DP_{su} . As these units constitute only a subset of the mFRR and the T&C BSP mFRR it needs to be clearly specified which terms and conditions are applicable to this subset and which are not. In addition, please find below a non-exhaustive overview of some detailed topics:

- As with OPA and SA, a procedure needs to be put in place with respect to the appointment (and termination thereof) of the BSP;
- Article II.10.9: in the current CIPU contract for offshore IDPCR's can be submitted irrespective of the colour of the zone, this is to be maintained going forward;
- It is unclear whether Article II.16.5 will be applicable to contracted reserves DP_{su} (currently not foreseen in CIPU offshore);
- mFRR requested (page 77): this value is presented as “given”, a clear methodology is to be provided how this value will be established;
- mFRR Supplied (DP_{su}) (page 78): these formulas seem counterintuitive (e.g. the outcome for mFRR Supplied (DP_{su}) upward result in a negative value while a positive value is expected).

Kind regards,



Pieter Schipper
SVP Continental Energy Management
Managing Director
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