



# FLEXCITY

by  VEOLIA

**Flexcity Belgium NV**  
F. Demetskaai 52  
1070 Brussels

**Elia System Operator**  
Boulevard de l'Empereur 20  
1000 Brussels – Belgium

Brussels, 2<sup>nd</sup> April 2020

**Subject: Flexcity's view on the Formal public consultation on Terms and Conditions for balancing service providers for Frequency Containment Reserve (FCR)**

Dear Sir or Madam

Flexcity would like to thank Elia for giving us the opportunity to participate in the formal consultation. After review of the available documentation Flexcity would like to make the following point:

#### **Definition of FCR Missing Time**

For Flexcity the definition of FCR Missing Time does not seem to reflect the quality of the delivered service. If the first 10 second interval in which the average FCR Power supplied is inferior to the FCR Capacity Requested is more at the start of the 25min period or more at the end should not necessarily the penalty will be different while not reflecting the qualitative difference between both. It would seem more logical to take, as definition of FCR Missing Time the total time in which the the FCR power supplied was inferior to the FCR capacity Requested.

Kind regards,

Cedric Weyns  
Country Manager Belgium  
Flexcity Belgium NV  
Tel: +32 473 49 03 73  
Cedric.weyns@Flexcity.energy