

CONSULTATION REPORT

**Report on the public consultation
regarding *the study on the
designation of multiple Balance
Responsible Parties on an Access
Point***

31th October 2021



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1. Introduction

Elia organized a public consultation from Thursday 15th of July to Monday 6th of September 2021 regarding the study aiming at analyzing the possibilities and providing recommendations for the designation of more than one Balance Responsible Parties (BRPs) on an Access Point (hereafter Study on multiple BRPs per Access Point).

The purpose of this report is to consolidate the feedback received from the public consultation, while at the same time reflecting Elia’s position on these reactions.

2. Feedback received

In response to the public consultation, Elia received the following non-confidential replies from the following parties:

- Belgian Offshore Platform
- Centrica
- FEBEG
- Febeliec

All responses received haven been appended to this report. These reactions, together with this consultation report, will be made available on Elia’s website.

3. Instructions for reading this document

This consultation report is structured as follows:

- Section 1 contains the introductory context,
- Section 2 gives a brief overview of the responses received,
- Section 3 contains instructions for reading this document,
- Section 4 discusses the various comments received during the public consultation and Elia’s position on them,
- Section 5 contains the annexes of the consultation report.

This consultation report is not a ‘stand-alone’ document, but should be read together with the proposal submitted for consultation, the reactions received from the market participants (annexed to this document) and final proposal.

Section 4 of the document is structured as follows with additional information on the content per column below.

Number	Stakeholder	Comment	Justification
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A	B	C	D
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- A. The number of the comment
- B. It is indicated who made the comment. In general, the comments are listed alphabetically in the name of the parties concerned.
- C. This document contains an overview of the main, but also specific comments on the document submitted for consultation.
 - o In doing so, an attempt was made to list/consolidate all comments received and to argue whether or not they should be taken into account.
 - o In order to maintain authenticity, the comments have been copied as much as possible in this document. However, the comments have sometimes been shortened and term have been uniformed to make them easier to read.
 - o For clarification purposes, it is recommended to always include the original comment of the stakeholder concerned, as included in the appendix to this report.
- D. This column contains Elia's arguments as to why a comment was or was not included in the final proposal. However, this column does not contain the final text. For this purpose, the final proposal must be consulted.

4. Comments received during the public consultation

This section provides an overview of the reactions and concerns of market parties that Elia received to the document submitted for consultation.

Number	STAKEHOLDER	FEEDBACK RECEIVED	ELIA'S VIEW
1	Belgian Offshore platform	<p>BOP welcomes the introduction of multiple BRPs behind a single Access Point. As indicated in the study in §2.1, splitting assets (i.e. parts of the offshore wind park) behind an Access Point by assigning it to more than one BRP could reduce the financial risks for BRPs and further open the limited BRP market in Belgium. The current Annex 9 of the access contract is too restrictive, as a single lead BRP is to be assigned. Nevertheless, we have the impression that the current study, in an attempt to be as generic and technology independent as possible, remains quite theoretical and therefore we welcome a dedicated session with Elia on a possible practical implementation for offshore windfarms. We specifically envisage a split of an offshore wind park (OWP) into two or more groups of physical assets to be assigned to different BRPs, i.e. groups of strings (each string containing several wind turbines), where each group of strings can be individually controlled by a power controller. Some specific attention might be given to a situation with looped strings. For example, string A (connected to 5 wind turbines) and string B (connected to 6 wind turbines) are looped. In case of a cable error on string A between turbine 3 and 4 (counting from the OSS), the energy of turbines 4 and 5 could be evacuated via string B. When both strings are allocated to a different BRP, the energy might flow to the perimeter of a different BRP. A pragmatic solution could be to allocate looped strings to the same BRP.</p>	<p>Elia thanks BOP for the supportive comment. Elia also reminds that the purpose of this study was to look for solutions that allow a maximum of options to all grid users (not only wind parks) and therefore the study has to be generic. This being said, the new design proposed by Elia takes into account as many as possible specificities gathered during the interviews and makes possible the specific split mentioned by BOP thanks to the introduction of the BDP concept. The dedicated bilateral discussion suggested by BOP took place on 19/10 and Elia understood during this meeting that the looped string is only used as an emergency support role in case of an issue on one string and so not to evacuate the power of the damaged string via the other string. As discussed during the bilateral meeting, an option is also to appoint the same BRP for these two strings to avoid any interferences due to looped strings. More generally, working in pairs of strings would solve any BRP related nomination issues.</p>

2	Belgian Offshore platform	<p>We would like Elia to clarify the definitions in the context of an offshore wind park (OWP) and preferably indicate it in a schematic manner:</p> <ul style="list-style-type: none"> • What is the definition of a Power Park Module? Is this always the entire OWP or can it be considered as the group of strings which can be individually controlled? In our understanding this definition is regulated by the EU RfG: ‘power park module’ or ‘PPM’ means a unit or ensemble of units generating electricity, which is either non-synchronously connected to the network or connected through power electronics, and that also has a single connection point to a transmission system, distribution system including closed distribution system or HVDC system; So unless an OWP has more than one connection point (e.g. C-Power) the PPM is the entire OWP according to this definition. • Technical Facility (TF): the entire Power Park Module (PPM) is considered (cf. page 20) • Technical Unit (TU): Is this each individual wind turbine? <ul style="list-style-type: none"> o Or a string of wind turbines connected to a busbar? o Or the entire PPM? o Or can this be chosen in the case of an OWP? • Delivery Point (DP): is a conceptual point that designates the level for market operations <ul style="list-style-type: none"> o By default, the Delivery Point is defined at the level of the Technical Unit, hence the definition of TU is to be clarified. If the TU is at turbine level, it is not feasible to provide schedules per turbine. o Can the delivery point be defined as a group of strings? o An exception is provided to define the Delivery point at the Technical 	<p>Elia confirms BOP’s understanding of the PPM as defined in the EU RfG. It is indeed the entire OWP connected to the Elia grid via one connection point.</p> <p>A Technical Facility can be a sPGM or a PPM (as defined in the RfG) or a Demand Facility (as defined in the DCC)</p> <p>A Technical Unit is a device or aggregation of devices that produces and/or consumes electricity such as the gas turbine of a TF which is a combined cycle gas turbine (CCGT) For a PPM, the TU is by default at the level of the TF.</p> <p>Delivery Point is indeed a point located behind (or at the level of) an Access Point where the provision of a specific service (balancing, redispatching...) is measured and verified. The location of the DP is specified by the SA (pursuant to the provisions of T&C SA) and/or by the BSP (pursuant to the provision of the T&C) BSP which are out of scope of this study.</p> <p>Note all the above mentioned definitions are not in scope of the present study. The study reminds and builds on those concepts in order to be compliant with the design evolutions (iCAROS¹, balancing²...).</p>
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¹ More information on the iCAROS design is available on the Elia website: https://www.elia.be/-/media/project/elia/elia-site/electricity-market-and-system/system-services/being-available-for-the-system/20200225_design-phase-1-icaros-25-february-2021.pdf

² More information on the definitions related to balancing products are available on the Elia website: <https://www.elia.be/en/electricity-market-and-system/system-services/keeping-the-balance/mfrr>

		<p>Facility. As the Technical Facility is considered to be the PPM, this can only be a solution if the OWP can be split into several PPMs.</p> <ul style="list-style-type: none"> • Balancing Delivery Point (BDP): needs to be a Delivery Point or a group of Delivery Points (cf. orange box page 29) to be able to perform BRP corrections of balancing services. <p>o From Figure 12 (page 31) we understand a BDP can be a group of turbines, correct?</p> <ul style="list-style-type: none"> • (p30) Schedules (as well as redispatching bids) will need to be delivered at the level of these DP's by the unique SA of this Technical Facility. <p>Can Elia clarify possible limitations linked to the fact that the SA is linked to a TF and not to a BDP, as shown in figure 12? Because the party delivering redispatching bids has to be the same as the BSP? Meaning that although more than 1 BRP can be assigned behind the Elia grid connection point, only 1 SA and thus also only 1 BSP is possible for the entire wind farm?</p>	<p>Elia does not impose the provision of schedules per wind turbine nor the appointment of a separate BRP per wind turbine.</p> <p>The location of the BDPs has to be specified by the ACH. The BDP <u>can be</u> an Access Point, a TF, a TU or an aggregation of TU's or TF's located behind the Access Point. Regarding the relation between BDP and DP, a BDP must be either on the same level as a DP or upstream of that DP. The figures 12 and 13 in the note have been clarified to show the possible configurations of BDPs and DPs</p> <p>In practice for an OWP,</p> <ul style="list-style-type: none"> • If only one BRP is appointed for the entire OWP (BDP=AP) then a DP will be necessary and placed in such a way that it measures the entire PPM. Note that PPMs \geq of 1MW have the obligation to offer scheduling and redispatching, and PPMs \geq of 25MW have the obligation to offer balancing energy bids. • As of the moment that the Grid User opts for more than one BRP (by ex. by fixing a BDP every two strings of wind turbines) different DPs will have to be fixed behind (downstream) those BDPs. <p>Concerning the limitation linked to the designation of the SA, Elia reminds that the SA is indeed designated by the Grid User at the level of the Technical Facility (i.e. the OWP) as foreseen in the iCAROS design. The</p>
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			SA is then unique for a given PPM to facilitate the coordination and ensure the coherency of the provided data (e.g. the schedules).
3	Belgian Offshore platform	<p>Figure 9: Please clarify if in this schematic the double circle symbol is used for a metering device or as power transformer.</p> <ul style="list-style-type: none"> • In case a power transformer is intended, does this imply that a Balancing Delivery Point (BDP) of a wind park can only be defined per transformer and thus the wind park can only be split into groups of turbines connected to the same power transformer? This might be too restrictive. We envision the possibility to split a OWP into groups of strings. • In case a metering point is intended, please clarify in the Figure to avoid confusion. <p>Figure 9 seems to indicate that a delivery point can group a string of wind turbines. But in that case, this is in contradiction to 3.5 stating that a delivery point is on the level of a TU or a TF (= entire PPM). A string of wind turbines is in between a TU and TF.</p>	Elia confirms that the double circle symbol is a power transformer. However, this does not imply that a BDP must be defined per transformer; it can perfectly be a group of strings. The figure has been clarified in order to avoid confusion.
4	Belgian Offshore platform	<p>Rule 3: A BDP can be an AP, TF, TU or and aggregation of TU or TF. Hence the importance of clarifying the definitions in §3.5 in the context of an OWP.</p>	Concerning the definitions of TU, TF and DP, Elia would like to point the stakeholders to the relevant discussions held in the iCAROS trajectory.
5	Belgian Offshore platform	Can the BRP-AP be different from all BRPs allocated to the BDPs?	Elia confirms that this is possible. This point has been clarified in the note.
6	Belgian Offshore platform	<p>“The possibility to appoint multiple BRP’s downstream of an Access Point may be given only to Grid Users who are also their own Access Contract Holder.” We understand this reasoning, to ensure consistency / continuity responsibility, but it does seem contradictory to the iCAROS design, whereby roles that are also crucially dependent on each other 3 (SA and OPA) are split, and the Grid User remains responsible for the</p>	<p>Concerning the first point, Elia wants to state that:</p> <ul style="list-style-type: none"> • Pursuant to dispositions of the SOGL and the FGC, the SA and the OPA have to be appointed by the Grid User who is responsible to provide

		<p>coordination between both roles and the consistency of the information provided by SA and OPA to Elia.</p> <ul style="list-style-type: none"> • Figure 10: Can the metering requirements be explained in a more detailed manner? What is the role of the BRP-AP in this scheme? Is this the same entity as the ACH? • “ Allocations (including the consumption of the user’s own grid due to losses) should be made by the Access Contract Holder based on metering and calculations as agreed with the BRP’s active within the Access Point. Allocations will be communicated by the ACH to the BRPs, Suppliers and Elia on a daily basis [...]” What exactly needs to be sent to Elia on a daily basis? If every BDP needs an Elia metering device, the allocation is based on the meter readings, which Elia has access to. What still needs to be communicated? • “Allocations will be communicated by the ACH to the BRPs, Suppliers and Elia on a daily basis in a standardized file template (EXPORT92 or MIG 6) [...]” This seems very restrictive for Grid Users being their own Access Holder? Thus pushing these grid users towards the execution of it by Elia, which has to be paid for by the Grid Users? 	<p>those different market parties with the necessary information to do their job correctly.</p> <ul style="list-style-type: none"> • Pursuant the dispositions of the Federal Grid Code, the BRP(s) responsible for an Access Point is (are) appointed by the ACH. • In the Study, in order to ensure consistency and continuity in responsibility, Elia specifies that the Grid User himself has to also be the ACH if he wants to appoint more than one BRP for his Access Point; <p>The metering requirements have been clarified in more details in the section 6.4 of the note. The BRP_{AP} is not necessarily the ACH but is designated by him. The BRP_{AP} is the party to the perimeter of which any difference between allocations and energy measured at the headmeter is allocated.</p> <p>Every BDP does not necessarily needs an Elia metering device as the metering solution (including meter specifications) to collect allocation data is left to the ACH as long as the involved parties (ACH, BRPs) agree on the chosen solution as stated in the updated section 6.4 of the note. If the BDP is at the same level than a DP providing an ancillary service, the metering device has of course to be compliant with the metering requirements defined in the contract of the ancillary service.</p> <p>Daily communication of allocations allows to easily detect errors and to correct the allocations quickly and efficiently if necessary. The need for standardized templates also applies for CDSO's who already use them.</p>
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			Furthermore, the ACH can work with external contractors who may help them fulfil their obligations (albeit ACH's remain contractually engaged).
7	Belgian Offshore platform	<p>“Suppliers are appointed by the Access Contract Holder and are informed in the Access Contract.” Is in this case, the Supplier, (a) the entity with a supply license included in the list of Suppliers? (b) the entity that supplies energy to the OWF for “own consumption” during low wind periods? In case of definition (b): “In a BDP configuration, Suppliers should follow the same anchor point as BRP’s.” Does this mean that if you appoint 3 BRPs, you also need to appoint 3 suppliers? Why would this be required. The supply agreement can be on the Access Point, with the supply appointed to the BRPAP. OWF have consumption (of the OSS) before the string-meters, so having the supply on the same level as the BRPs, will give a mismatch between the sum of the supplies on the string levels, and the supply on the AP</p>	As it is the case for existing annexes of the Access Contract allowing the designation of more than one BRP, a supplier is also informed for each designated BRP. Following the same logic, a supplier has to be informed at each BDP as well as for the AP. It can be the same party who is supplier for all BDPs and APs.
8	Centrica	<p>Centrica welcomes this consultation from Elia and the possibility to go towards easier implementation of multiple BRPs per Access Point cases. This will indeed ease the possibility to unlock the flexibility of some assets, for which currently available configurations either in terms of ToE and/or of metering are problematic or not applicable.</p> <p>In that sense, Centrica however could not clearly understand from the consultation document what metering specifications would be required for which Balancing Delivery Point configurations, and therefore would welcome some clarifications from Elia.</p> <p>Indeed, while Centrica fully supports the Requirement n°5 of the new design laid down by Elia stating that “The proposed design must allow a high degree of flexibility in regards to allocation process and metering”, the document also mentions that “As per requirements from the technical regulations, the Grid User behind a certain Access Point has the responsibility to ensure that meters used for the allocations respect the requirements of the applicable technical regulation, depending on</p>	<p>Elia thanks Centrica for the supportive comment. Concerning the metering requirements, Elia has clarified the concerned section 6.4 in the note and precises that the choice of the metering solution (including specifications of the meter) is left to the ACH as long as the involved parties agree on the chosen solution. This approach intends to provide flexibility to the market parties.</p> <p>This being said, Elia reminds that the metering requirements associated to Delivery Points for the provision of ancillary services such as aFRR, mFRR and SA still apply, although out of the scope of this study.</p> <p>In this context, if a ACH appoints a BDP at the same level or upstream a DP (for example providing mFRR</p>

		<p>which one of the latter is applicable for the connection point from which the BDP depends”.</p> <p>Looking at the current requirements for products like aFRR or mFRR, at federal or regional level, Centrica recalls that metering requirements and in particular in case of submetering, are already often too restrictive and do constitute a minima additional costs if not a blocker to the management of some flexible assets.</p> <p>Therefore, Centrica underlines the necessity for multiple BRPs behind an Access Point situation to alleviate this constraint and effectively allow for some more flexible and accessible metering solutions. Would it not be the case, then it would significantly reduce the interest of the proposed solution and the foreseen workable cases</p>	<p>with as baseline the last QH), the DP will have to be associated to a submeter respecting the specific submetering requirements described in the T&C BSP mFRR.</p>
9	FEBEG	<p>The efforts to improve the market functioning as a whole are much appreciated, however, it is important to ensure that the benefits exceed the costs. As a first remark, FEBEG would like to share again its opinion on projects prioritization for the coming years. The projects MARI, iCAROS and PICASSO will take most of our attention and resources. Other projects are low or even outside the priority list. In this context, FEBEG wants to inform ELIA that its members cannot put a lot of time and efforts in reviewing the proposed design in details, as well as evaluating the impacts such a design would have on its operational processes. As a general appreciation, FEBEG can agree that – from a theoretical point of view - the proposed multiple BRPs regime would solve very specific blind spots in the market design. However, it is unclear whether the presented blind spots (e.g. wind, off-take and CHP behind the same access point) are real issues to market parties and whether the new possibilities offered by this regime would have any (significant) impact in real life. In addition, FEBEG regrets that facts and figures are missing in the design note, this makes an in depth and detailed assessment very difficult.</p>	<p>Elia takes note of FEBEG comment and will take the workload of other projects into account when establishing the implementation plan before the end of this year. Concerning the benefits of implementing this new scheme and the facts and figures related to a quantification of the need for such an improvement, Elia refers to the use cases presented in the section 2 of the study and in the feedback gathered through bilateral discussions with stakeholders described in section 4 as well as the answers of other stakeholders to the public consultation presenting some specific and practical use cases on which this scheme could be applied.</p>

10	FEBEG	<p>We believe that new concepts (BDP) and roles (BRPap) introduced will further inflate to the ever increasing complexity of the market design and could be detrimental to the general understanding of the market functioning. We are concerned the proposed design will impact nearly all roles in the market (ACH, BRP source, BRPfsp, BSP, SA, OPA) and will change the modelling of delivery points behind an access point. The identified impacts of the proposed amendments are multiple: allocation process, settlement, review of T&C's BRP and access contracts, review of existing bilateral opt-out contracts (in the context of TOE)</p>	<p>The new scheme proposed by Elia takes into account the evolution of the electricity market and the impact of project such as iCAROS. It is the reason why the notion of BDP is coherent with the notion of DP and avoids any change in the other project's design. The objective is also to facilitate some procedure in the context of the ToE as described in the note.</p> <p>Elia also wants to mention that the implementation impact will be assessed in details in the implementation plan.</p>
11	FEBEG	<p>The process behind requesting multiple BRPs is not fully clear to us. Who will be the requesting party? Who will take the final decision of having several BRPs behind an access point? What if a BRP of a given access point refuses the request to split it into several BDP? ELIA mentions in its design note that the move to Multiple BRPs regime would impact how the grid losses are computed. It is indicated that the consequences of multiple BRPs on the netting per access point need to be further analyzed. As there is currently a netting per access point, FEBEG clearly wants to avoid a step backwards where its members would be paying more grid losses because of fewer netting possibilities.</p>	<p>Elia's intention is that this multiple BRP scheme becomes an additional annex to the Access Contract similarly to the existing annexes allowing the designation of more than one BRP on an Access Point. The Access Contract Holder (role that has to be taken by the Grid User in this context) will then be the requesting party for such a scheme allowing the designation of BRPs on his Access Point. All the involved parties (ACH, BRPs) of course have to provide their agreement on the fact that they are part of such a specific annex via e.g. a signature of the annex.</p> <p>As stated in section 7 of the study, Elia analyzed the possibilities in order to count the grid losses based on the netto offtake at the level of the Access Point and this for all existing and new configurations (the new one proposed in this study as well as annexes 3bis and 14). Elia confirms that an evolution towards this possibility is the objective. Elia will analyze more in detail the practical implementation needed to apply this rule (and more particularly the way to split the netto losses among all the BRPs of all the BDPs located behind the</p>

			Access Point). Elia reminds that the implementation of the netting of the losses is independent on the implementation of the scheme proposed in this study and can follow its own trajectory. Elia will however consider this point in the framework of the implementation plan following this study in order to assess the impacts and will try to aim an implementation which is relatively aligned with the implementation of the new scheme presented in this study.
12	FEBEG	ELIA is willing to communicate the results of the allocation process to the BRP of a balancing delivery point. However, this service is to be remunerated. Are we sure that a situation where a BRPap is obliged to appoint several BRPs behind an access point and is obliged to pay Elia for this service will not occur? We wish to underline that FEBEG members do not want to face new unexpected costs. If deemed really necessary, the requesting party of having several BRPs behind an access point should bear all costs associated to this access point that are charged by ELIA.	Elia reminds that the proposed scheme foresees that the ACH (which is the Grid User himself in this case) is by default responsible for the allocation process and communication of all allocation information to Elia, the BRPs and the suppliers. The transfer of the communication tasks to Elia is not an obligation and is a free choice of the ACH when choosing to apply a multiple BRPs scheme.
13	FEBEG	Specifically regarding ToE, defining a BDP within an access point can indeed help to correctly measure the reaction to a setpoint (or Energy required). However, this requires the installation of a meter recognized by Elia. In this context, the installation of an official meter in an easy and cheap way is a prerequisite to perceive any benefits of this scheme.	Elia confirms that the facilitation of the transfer of energy was also one of the driver to propose this scheme as stated in section 2.2 of the study. Concerning the metering requirements, Elia has clarified the concerned section 6.4 in the note. Elia reminds however that the metering requirements associated to Delivery Points for the provision of ancillary services such as aFRR, mFRR and SA still apply, although out of the scope of this study.
14	FEBEG	When it comes to the Implementation plan, FEBEG wants again to mention that its members need to make choices on where they allocate	Elia takes note of FEBEG and will take this into account when preparing the implementation plan.

		<p>their budgets and resources. The massive MARI - iCAROS – PICASSO projects have been identified as the top priority. If multiple BRPs regime would be implemented, FEBEG calls ELIA’s attention on the fact that the implementation plan must be the lightest possible and focusing on where the highest value is. For example, the concrete situation where 2 BRPs would be appointed on one offshore parc can be dealt with in an adhoc bilateral contract between these 2 BRPs and not necessary with a multiple BRPs scheme.</p>	
15	FEBEG	<p>As a conclusion, FEBEG has reservations about the added value such a regime would bring because of the lack of facts and figures presented. Nevertheless, we wish to clarify that we are not opposed to the idea as such. Our key message is that if such a scheme is deemed useful, the impacts on current BRPs need to be limited. The main concerns we have are: paying extra grid fees on the back of fewer netting possibilities, receiving extra regulatory obligations (e.g. daily allocation with a BRPbdp), being in a situation where we are obliged to pay for a service (ELIA doing the allocation) while not having the possibility to refuse it and last but not least, being obliged to implement new processes and adapt tools as a result of an undesired implementation plan (that would be in conflict with priorities on MARI – iCAROS – PICASSO)</p>	<p>Concerning the benefits of implementing this new scheme and the facts and figures related to a quantification of the need for such an improvement, Elia refers to the use cases presented in the study as well as the answers of other stakeholders to the public consultation presenting some specific and practical use cases on which this scheme could be applied.</p> <p>Elia would also like to remind that the multiple BRP scheme is merely an option and not an obligation for the ACH when designating the BRP(s) responsible for its access point. All involved parties (the BRPs) need to agree with the ACH before such a scheme can be implemented.</p> <p>Finally, Elia's design focuses precisely in reducing implementation to the minimum, while leaving options to market parties.</p>
16	Febeliec	<p>In general, Febeliec would like to stress that this topic of multiple BRPs per access point is important for industrial consumers, classified as Demand Facility directly connected to a public transmission/grid operator , (and thus not only pressing for off-shore wind farms as Elia indicates in the document), as it would enable industrial consumers to slice up their</p>	<p>Elia thanks Febeliec for the supportive comment about the importance of the study and agrees with the use-case mentioned by Febeliec.</p>

		<p>overall offtake/consumption and spread it over several BRPs (and suppliers), thus allowing also in the market for the (very) large consumers more competition between suppliers (as large consumers might be too large in their total for a single supplier, thus limiting liquidity and competition on the market). At the same time, the designation of multiple BRPs per access point will also facilitate flexibility with a third party, as rightfully indicated by Elia.</p>	
17	Febeliec	<p>On a high level, Febeliec strongly believes that in analogy with annex 14 the solution to the topic of multiple BRPs per access point lies in the creation of a new annex which covers the same topics as the annex 14, but then for those demand facilities that are not CDSs. Febeliec believes this presumably should involve no important new developments and could even be easier from an operational point of view as for such non-CDS demand facilities there would be less need for very stringent metering and accounting to ensure that all legal entities are correctly allocated and invoiced, as in principle (as opposed to CDSs) there should only be a single legal entity and thus indeed an agreement between this legal entity and the different BRPs active on its access points on topics such as metering and allocation of losses should be more straightforward.</p>	<p>Elia agrees with Febeliec's point of view and confirms that this was the underpinning concept of the design. These questions were discussed during the bilateral meeting organized between Elia and Febeliec on the 12/10. Elia has clarified the section 6.4 about metering requirements in the note.</p>
18	Febeliec	<p>Febeliec notices that Elia states that, regarding the articles 204 and 205 of the Federal Grid Code, <i>“an analysis should however be made to determine whether these articles need to be changes before applying any proposed solution involving more than one BRP”</i> and wonders who will conduct such analysis and in which timeframe, as it is important that this does not become a blocking element in a later (implementation) timeframe. Febeliec insists that such analysis will be conducted as soon as possible and by preference before the end of the year and the conclusion of the overall analysis by Elia (and thus under the framework of the incentive of the CREG) as Febeliec considers this an integral part of such analysis</p>	<p>According to Elia, the current articles of the Federal Grid Code do not prevent the implementation of the new scheme presented in this study even if some clarifications could be brought. This point has been clarified in the section 3.1 of the note. Elia will discuss with the CREG during the realization of the implementation plan that will follow this study to identify the clarifications that could be provided to the Federal Grid Code.</p>

19	Febeliec	Febeliec also takes note of the references to certain annexes of the Access Contract (e.g. 9 and 10), which will probably be removed towards the future. Febeliec however does not see this as a major issue, as it is clear that a better overall solution is required. Febeliec in the framework of the discussion on the Access Contract also always has made this remark, as it could agree with the removal of several (non-used) annexes in light of an alternative (better) solution.	Elia takes note of Febeliec’s comment and refers for this discussion to the public consultation about the review of the Access Contract as mentioned by Febeliec
20	Febeliec	As already stated above concerning the references to the current solution in place for Closed Distribution Systems, Febeliec indeed believes that this solution would be a good basis an overall solution (beyond the scope of CDSs). Febeliec would like to stress that, as Elia indicates in its reference to CDS, the designation of multiple BRP’s per CDS-Access Point is already possible through the concept of Market Access Point, which through its multilevel design is designed to enable multiple BRP’s and Flex for a CDS GU (Cf. also point 3.4, p17).	Elia confirms that the concept of Market Access Points was among the main inspirations for the BDP concept.
21	Febeliec	On the notion of the balancing delivery point (BDP), Febeliec does not necessarily understand why this cannot be downstream from another BDP or a TU, as it believes that solutions can be devised to facilitate this. Febeliec would like to have a more in-depth discussion on this point, to better understand the reasoning by Elia for not allowing such combinations. In light also of the future market design and the implications with respect to iCAROS, Febeliec would like to get some better understanding on how Elia envisages this concept, also from a practical perspective. E.g. in point 6.2 on the BDP it is stated that this is “by default the Access Point unless requested otherwise by the Access Contract Holder and agreed upon by Elia based on the conditions listed in the chapter”. As Elia states here agreed upon by Elia and not the RSO, Febeliec wonders to what extent this solution will be applicable for all possible situations (which is the intention of Elia as stated), also where Elia is not the RSO. Febeliec wants to refer in this context towards the concept of market access point as this covers all required elements without introducing new denominations and slightly different concepts and should thus lead to a more rational streamlining.	<p>During the bilateral discussion with Febeliec organized on the 12/10 about this point, Elia clarified the reasons of the rule stating that a BDP cannot be downstream a DP as stated in the section 6.5 of the study. Based on the questions received, Elia has modified the section 6 of the document as follows:</p> <ul style="list-style-type: none"> • In section 6.1, the figure 9 and the description have been clarified to provide a more detailed example to introduce the new design • in section 6.2, the third and fourth points have been clarified, the sixth point has been deleted and a new figure 10 has been added to better explain the rules to define the BDPs • In section 6.5, the figure 12 has been improved and the figure 13 has been added to provide more complete examples of possible and not possible configurations of BDPs and DPs

			<p>As stated by Elia in the study, Elia reminds that this specific scheme will not apply for CDS's for which the annex 14 already exists and not for Technical units located in the Distribution Grid (that have no Access Contract with Elia).</p> <p>Concerning the nomenclature, the Market Access Point generic denomination was not chosen in order to avoid confusion with the specific concept of the CDS's that is regulated by its own framework in Annex 14.</p>
22	Febeliec	<p>On the impact on the calculation of federal losses in case of several BRPs behind a certain access point and the lack of netting of energy between different BRPs (which leads to artificially high federal losses to be provided), Febeliec strongly appreciates that Elia is analyzing this point, but would like to have some more clarity on when a such analysis on the practical implementation of a solution that solves this longstanding issue and hopes that this will also be part of the overall scope of the incentive of the CREG and thus be conducted throughout 2021. Febeliec indeed agrees that this can be treated independently from the track on the designation of multiple BRPs on an access point, but insists that this does not lead to a much longer implementation time for such a solution and is included in the overall implementation plan to be delivered to the CREG.</p>	<p>Elia confirms that the implementation of the netting of the losses is indeed independent on the implementation of the scheme proposed in this study and can follow its own trajectory. Elia will however consider this point in the context of the implementation plan following this study in order to assess the impacts and will try to aim an implementation which is relatively aligned with the implementation of the new scheme presented in this study.</p>
23	Febeliec	<p>As already referred to above, Febeliec does not agree completely with the general statement of Elia in point 3.3, Annex 14, that, in a CDS, the CDSO and the CDS grid users may use their own private meters. The concept of the Market Access Point, in combination with the CDS Metering, is able to facilitate the multiple BRP-questions and most of the flexibility products. As stated in the FTR, in case the metering used for the allocations for the financial settlement are not suited to measure</p>	<p>Elia underlines that Febeliec's comment is correct and has clarified the parts of sections 3.3 and 3.4 of the note concerning the CDS following Febeliec's comment and discussions during the bilateral meeting with Febeliec.</p>

		the flexible product, the CDSO and CDSGU will find a best solution, where a CDS grid user-meter is a possible option. In order to ‘Avoid introducing unnecessary strict requirements and complexity as well as incoherencies with metering obligations’, as correctly stated by Elia in art 4, Febeliec insists on the conservation and the intelligent conversion of these FTR rules.	
24	Febeliec	In point 7, Febeliec does not understand what Elia means with “Closed Loop Losses only exist if the BRP has this responsibility” and asks for additional clarification.	Elia precises that it means that not all BRPs active in a CDS will need to take the losses in their perimeters. It is up to the ACH to determine which BRP shall undertake grid losses in his perimeter. Elia has clarified this point in section 7 of the note.
25	Febeliec	Febeliec would like to ask Elia to organize a bilateral meeting to discuss the above points as well as some other open issues with respect to the proposal (e.g. concerning the application of transfer of energy). While Febeliec is in favor of (intelligently) transposing the existing solution for CDSs to Demand Facilities that are no CDS, the proposed solution by Elia raises some questions towards the application of the concepts for CDSs to non-CDSs. Amongst others, it should be clear that in case such a non-CDS Demand Facility were to become over time a CDS, this should not lead to fundamental change of their operations, which is not necessarily guaranteed by the current proposal of Elia. Febeliec also would like to further discuss the metering and metering requirements as Febeliec understands from the Elia proposal in point 6.4 that “allocations should be made by the Contract Holder based on metering and calculations as agreed with the BRPs active within the Access Point”. While Febeliec supports such approach in general, it wants to better understand what the intentions of Elia are towards this topic to avoid that this leads to unsustainable situations for the Access Holder with respect to the allocations.	<p>Elia refers to the bilateral discussions with Febeliec on these topics that was organized on the 12/10. Based on Febeliec’s questions Elia underlines that some clarifications that seemed to be necessary and therefore some sections have been adapted in the note following this meeting. More precisely:</p> <ul style="list-style-type: none"> • In section 6.1, the figure 9 and the description have been clarified to provide a more detailed example to introduce the new design • in section 6.2, the third and fourth points have been clarified, the sixth point has been deleted and a new figure 10 has been added to better explain the rules to define the BDPs • In section 6.5, the figure 12 has been completed and the figure 13 has been added to provide more complete examples of possible and not possible configurations of BDPs and DPs • In section 6.3, The role of the BRP_AP has been clarified to precise the two main roles that need to be undertaken by this BRP.

			<ul style="list-style-type: none">• In section 6.4, the metering requirements have been clarified
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5. Next steps

On the basis of the reactions received from market players and its views, as set out in this consultation report, Elia will finalize its note on the study about the designation of multiple Balance Responsible Parties on an Access Point.

The final study will be published on the Elia's website and will be sent to the regulator together with the present consultation report

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