

Dear,

Hereby our main concerns and comments on the General Framework of the Tertiary Control Non-Reserved Power product (Bidladder pilot project).

Our **main concerns** are:

1. The activation of the free bids on the bidladder will happen before the contracted R3 products. This can lead to high imbalance prices not reflecting true scarcity on the balancing market, as high priced free bids will be called while other reserves are still available.

To avoid such situations, we ask to put a high priority on the development of an integrated merit order.

2. We regret that it is currently not possible to participate on the bidladder with delivery points situated in the DSO grid. We hope that this possibility will be included in the next release.

3. We would like to ask Elia, to communicate the specifications and requirements with regards to the bidladder platform well in advance, to allow for a smooth IT implementation.

4. We would like to be informed why activation penalties are applicable in case of over delivery. We understand the need to limit the contribution of the BSP to the contracted volume: as he is only responsible for what he committed towards Elia, and that this safeguards reactive balancing as a prerogative of the BRP. But penalizing the activation beyond this contracted volume will discourage additional available flexibility to be offered to the market, for example: When the BSP of the service and BRP have a contractual agreement on this specific behavior. Therefore we propose to keep the rules created for the case of over delivery, by limiting the contribution of the BSP to the contracted volume as described in the final design note document, but remove the penalties associated with over delivery.

Please do not hesitate to contact us in case of remarks or questions.

Best regards