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## **Design Bidladder Pilot**

Dear Sir or Madam,

we strongly support the development of the bid ladder and we have no major concerns about the current design proposal but one.

Next Kraftwerke is an advocate for market designs in which all grid users regardless of whether they are connected to the TSO or DSO level should have equal access to any market for system service. No grid user should be discriminated. In our opinion there should only be one exception to this guideline: If there are sound technical reasons to exclude certain grid users, because their participation is a threat to safe system operation.

In our opinion any new product - even in the framework of a pilot project - should therefore allow both TSO and DSO connected clients to participate from the very start.

In the case of the Bidladder Pilot all DSO-connected grid users are excluded, which comes along with the following points:

- A significant potential of flexibility that can bring the necessary liquidity to the product is not tapped.
- DSO grid users are excluded just because of the point of connection and are therefore discriminated.

We understand that Elia will not further delay the Pilot to integrate DSO connected grid users, but we would be happy if the evolution of the design takes the inclusion of DSO grid user as a priority point.

Best regards, Paul Kreutzkamp

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