

ELIA

TO : Consultation R3NR non-CIPU GFA

Your reference	our reference	date
-	-	2017-03-31

Dear Elia,

we support the input provided by TeamWise and would like to add the following additional comments.

We ask Elia to continue to put pressure on the Belgian DGOs to open up the bidladder to DGA connected end-consumers.

We ask Elia to continue to insist on the urgency of the ToE law to complete the implementation of the bidladder non-CIPU.

Specific GFA points:

3.1 is not clear. If the provider is an independent aggregator who does he need a contract with? In our view the provider's ARP needs an agreement with the ARP of the concerned delivery points. Please confirm.

8.1: we disagree with this proposed penalty on principle. As we repeated multiple times during the workshops the notification prior to the activation is the best estimate of what will happen, but should not limit the aggregator in his ability to switch volume from one delivery point to another in real-time. We suggest that the quality of the notifications are monitored and reported on aggregated level. No penalties.

Annex 7. We are confused by the formulas. If as we assume the difference between Pref and Pmeas is positive then it is always larger than 0 and therefore the minimum is 0 every time. We assume that what is intended is that the value per delivery point is either 0 or positive. Please confirm.

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Although not specified in the GFA we would like to continue to express that the asymmetric way in which imbalance is managed in the context of the bid-ladder is the wrong solution to a valid concern. We ask Elia to analyze alternatives based on a symmetric imbalance transfer for future implementation in the bid ladder.

Kind Regards,

Peter Schell

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