

## Feedback Actility:

- Bidding rules
  - Actility does not agree with the 24hour, symmetric block possibilities :
    - it is uncertain that the price would really increase without them as the start-up cost argument is not always valid (when fully in the money, or when running at PMIN is an option,....)
    - it will delay the integration of non cipu units, hence also the price decrease that goes with it. It looks like the risk of short term price increases is deemed more important as long term and more considerable price decreases
    - Even when a short term price increase would materialize, this could be an incentive for more market players to enter the market and innovate and allow them to make investments required to bid assymmetric 4 hour blocks.
  - The ideal market design according to Actility is one with assymmetric, 4 hour blocks as described by ELIA. We however do not see the need for a temporary step which allows the 24hour blocks.
- Alternative for 'Opt-out' aFRR for pass trough clients with or without net injection.
  - Actility supports the alternative approach which has been presented and is currently already implementing this for mFRR