

Subject: Comments on the public consultation on  
Terms and Conditions for balancing services, restoration services, voltage and  
reactive power services and services related to congestion management.

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Contact: Jean-François Waignier  
Phone: +32 485 779 202  
Mail: Jean-francois.waignier@febeg.be

Please find hereafter the comments of FEBEG on ELIA's public consultation on the GT&C for balancing services (T&C FCR, T&C aFRR, T&C mFRR), restoration services (T&C RSP), voltage and reactive power services (T&C VSP), and services related to congestion management (T&C OPA, T&C SA)

## Comments

### General Comments

–A Hardship clause was included in the precedent GC but is missing in the proposed GC. It should be reintroduced.

–Art 1.7.3 Force Majeure

oP.9 “The term “force majeure” shall mean [...] [event] which has actually happened” : it should be completed with “or would happen if no measures are taken that prevent the performance of the obligations of the Party under this Contract”.

oP.10, first bullet : “the impossibility to operate the grid or installations that from a functional point of view are part of it” : it should be completed with “or the facilities of the Service Provider” (reciprocity)

–Art 1.10.1 (p13) Amendments : Entry into force of amendments to the Contract should happen not earlier than 30 days (instead of 15 days) after such notification to the Service Provider.