

**From:** Peter Claes <noreply@jotform.com>  
**Sent:** Monday, 4 November 2019 22:39  
**To:** Van den Waeyenberg Sofie  
**Subject:** Re: 20191004 public consultation on the Terms and Conditions for the mFRR - Peter Claes

A new answer to consultation " LE NOM DE LA CONSULTATION " has been submitted on our website.



**20191004 public consultation on the Terms and Conditions for the mFRR**

Name	Peter Claes
Email	febeliec@febeliec.be
Organization	Febeliec
Comments/suggestions to the consultation	Febeliec answer to the Elia consultation on the Terms and Conditions for balancing service providers for manual Frequency Restoration (mFRR)

Febeliec would like to thank Elia for this consultation on the Terms and Conditions for balancing service providers for manual Frequency Restoration (mFRR). Febeliec appreciates the hard work done by Elia in the elaboration of these terms and conditions and appreciates the open discussions during the workshops and the improvements brought to certain points (e.g. penalty scheme). Febeliec wants to refer to its comments on the general conditions, which were the subject of a different public consultation yet are also relevant related to this consultation. Febeliec also wants to stress its comments made during the discussions on testing and reiterates its request that Elia puts in place and documents a smart testing logic, in order to avoid unnecessarily testing delivery points, as these tests are costly and not remunerated and in case of demand side response can even result in lost production that can never be recuperated, presenting a loss for society. In any case, as balancing service providers will have to price the non-remunerated test into their offers, it is essential that the actual test policy is known, in order to avoid that candidates will price in theoretically more stringent testing policies that will never materialize. With respect to the proposed penalty scheme, Febeliec understands that there is a trade-off to be made between guaranteeing the availability

and delivery of the reserved capacity on the one hand and the impact of the penalties on the other hand. Febeliec appreciates that the penalty scheme has been revised in order to be less punitive for a first or small hiccup, while becoming much more severe for repetitive issues, thus guaranteeing the availability of the service that has been paid for by the grid users while also encouraging new entrants to participate and increase the liquidity of the product.

Answer confidential ? No

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