

## Rules on the organization of the Transfer of energy and the FSP Contract DA/ID

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### Centrica Business Solutions (CBS) response to the consultation

19th November 2020

First, CBS renews its support to and thanks Elia for the overall decision and implementation process of the DA/ID ToE: it will be a key enabler towards the next step of DR development in Belgium, and a key step to prepare the upcoming challenges and the need for additional capacity and flexibility in Belgium in the coming year.

Regarding the proposed rules and FSP contract, CBS points out to Elia to points of attention on which further clarifications or investigation would be welcome:

(i) given that some assets are still not eligible to some ToE regimes (DPs with no exposure to imbalances in aFRR mainly), imposing a unique ToE regime across all products for the same DP creates a risk of blocking situations, where a DP could lose its ToE regime in place for a certain product to go to aFRR for example.

-> CBS therefore asks Elia to consider removing this constraint and allow to have several ToE regimes per DP.

(ii) CBS understands the principle of having a unique FSP per DP across products, but underlines that the details of how conflicting situations will be handled by Elia remain unclear: in case an FSP wishes to add in ToE DA/ID a DP that is already engaged in aFRR or mFRR with another FSP (or vice versa), how Elia will detect the situation, inform the FSPs involved, and decide which FSP can remain active is unclear.

-> CBS therefore asks Elia to further clarify and consult on the details of the process and rules that will allow to sort such situations out in a transparent and fair way.