

**CONSULTATION REPORT**

# **Report on the public consultation regarding the study on baseline methodologies**

**17/12/2021**



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## 1. Introduction

Elia organized a public consultation from 27 September 2021 to 25 October 2021 regarding the study on baseline methodologies.

The scope, objectives and planned approach of the study have been presented during the Working group Balancing meeting of 29/1/2021. In a first dedicated workshop, organized on 16/3/2021, the stakeholder feedback on the use of baseline methodologies and the preliminary findings regarding the assessment of best practices have been presented. More detailed results and Elia's conclusions and recommendations have been presented in a second dedicated workshop, organized on 17/6/2021. Following the public consultation, the feedback received and Elia's response has been presented during the Working Group Balancing meeting of 8/12/2021.

The purpose of this report is to consolidate the feedback received from the public consultation, while at the same time reflecting Elia's position on these reactions.

## 2. Feedback received

In response to the public consultation, Elia received the non-confidential replies from the following parties:

- Centrica Business Solutions
- FEBEG
- Febeliec

In addition, Elia received one confidential reply.

All non-confidential responses received have been appended to this report.

## 3. Instructions for reading this document

This consultation report is structured as follows:

- Section 1 contains the introductory context,
- Section 2 gives an overview of the responses received,
- Section 3 contains instructions for reading this document,
- Section 4 discusses the various comments received during the public consultation and Elia's position on them,
- Section 5 contains the annexes of the consultation report.

This consultation report is not a 'stand-alone' document, but should be read together with the study published for consultation, the reactions received from the market participants (annexed to this document) and the final study.

Section 4 of the document is structured as follows with additional information on the content per column below.

Subject	Stakeholder	Comment	Justification
A	B	C	D

- A. Subject matter covered by the various responses received.
- B. Stakeholder making the comment. In general, the comments are listed alphabetically in the name of the parties concerned.
- C. This document contains an overview of the main, but also specific comments on the document submitted for consultation.
  - o In doing so, an attempt was made to list/consolidate all comments received.
  - o In order to maintain authenticity, the comments have been copied as much as possible in this document. However, the comments have sometimes been shortened and the terminology has been harmonized to make the report easier to read.
- D. This column contains Elia's arguments as to why a comment was or was not included in the final study report.

## 4. Comments received during the public consultation

### 4.1 General comments received during the public consultation

This section provides an overview of the general reactions and concerns of market players that Elia received to the document submitted for consultation.

SUBJECT	STAKEHOLDER	FEEDBACK RECEIVED	ELIA'S VIEW
<p><i>Main recommendations of the baseline study</i></p>	<p><b>CBS</b></p>	<p>CBS fully supports the rollout of calculated baseline in aFRR as soon as possible, in particular to unlock participation of technologies like wind and PV.</p> <p>CBS welcomes the analysis and proposal made by Elia and confirms that the potential is there: unlocking the baseline at the presented conditions (which all seem ok and fair) does seem to be a quick win / no regret option. CBS therefore asks Elia to consider implementing such an aFRR baseline as soon as possible.</p> <p>In that context, Centrica can provide bilaterally more confidential details on specific projects and assets that could make use of this new aFRR baseline.</p>	<p>Elia thanks CBS for its positive feedback and takes note of CBS' confirmation regarding the potential volumes that could be benefit from the calculation and submission of the aFRR baseline in real time (under the proposed conditions) as well as CBS' request for a swift implementation. Elia has considered the feedback received in the proposed implementation plan.</p>
	<p><b>FEBEG</b></p>	<p>FEBEG thanks ELIA for having the opportunity to react ELIA's Public consultation of the study on baseline methodologies.</p> <p>On part A (Baseline methodology performance) FEBEG agrees with ELIA's conclusions regarding the currently offered baselining options for mFRR, ToE DA/ID, CRM, Strategic Reserves &amp; aFRR with one remark.</p>	<p>Elia thanks FEBEG for the positive feedback and takes note of FEBEG's support for the main recommendations of the study.</p> <p>Elia further takes note of FEBEG's request to prioritize the implementation in function of the expected use and the additional capacity it yields. Based on the feedback received during the workshops, in which a specific interest has been expressed for the use of the calculated baseline for aFRR to enable the partic-</p>

		<p>On part B, with regard of the developing declarative baselines for ToE DA/ID, CRM &amp; mFRR, or the development of real time baselines for aFRR with RES, FEBEG is aligned with the conclusions of Elia.</p> <p>However seen the many subjects under discussion and implementation, FEBEG thinks the implementation should be prioritised in function of the effective use that will be made of the proposed solutions and the additional capacity it yields.</p>	<p>ipation of wind and solar PV, and to a lesser degree for the declarative baseline for mFRR and ToE DA/ID and the CRM, Elia understands that FEBEG prefers prioritizing the implementation of the calculated baseline for aFRR.</p>
<i>General feedback</i>	<i>Febeliec</i>	<p>Febeliec would like to thank Elia for this consultation on the baseline methodology assessment. Febeliec found the extensive overview of different baseline methodologies interesting and instructive. From a high level perspective, for Febeliec it is important that baselines do not form an entry barrier for participation in any products, be it balancing or day ahead and intraday markets (in relation with ToE), for any types of assets or flexibility, while at the same time safeguarding that all parties are correctly remunerated for their services and avoiding gaming or opening the door for any market manipulation or abuse in general.</p>	<p>Elia thanks Febeliec for the positive feedback and confirms that the aspects considered important by Febeliec (i.e., avoid entry barriers, safeguarding correct remuneration and avoiding market manipulation) are reflected in the criteria used in the study to assess the performance of the different baseline methodologies (i.e., simplicity and inclusivity, accuracy and integrity).</p>

## 4.2 Specific comments received during the public consultation

<b>SUBJECT</b>	<b>STAKE-HOLDER</b>	<b>FEEDBACK RECEIVED</b>	<b>ELIA'S VIEW</b>
Last QH baseline methodology for mFRR in case of consecutive activations	<i>FEBEG</i>	<p>The 'last QH' baselining is not accurate when a 1st mFRR activation is followed by an interruption of 15 to 30 minutes and then followed by a 2<sup>nd</sup> activation. This poses a risk for non-compliance while the requested power has correctly been delivered. FEBEG would suggest to include a ramp-down in the activation period. Although the occurrence is today not too frequent, it</p>	<p>Elia takes note of this remark of FEBEG, but reminds that this has already been discussed during the workshop on the new mFRR design (of 31 March 2021). Elia considers that there are no new elements or arguments</p>

		<p>can be expected to increase in the future with an increased need for balancing. This review of the baselining methodology would be an excellent opportunity to tackle this issue before it becomes a frequent problem.</p>	<p>provided and therefore remains its position that there is currently no sufficient motivation for changing the current Last QH baseline methodology for the following reasons:</p> <ul style="list-style-type: none"> <li>• the situation indicated by FEBEG relates to a very specific situation in which a single Delivery Point is used in two consecutive activations with exactly 2 quarter hours in between the periods of full activation*. At this point, it is uncertain how frequently such situations will take place once connected to the European mFRR platform.</li> <li>• Alternative baseline methodologies could be used to overcome a potential issue. This can be either the High X of Y baseline methodology or a declarative baseline methodology (in the form of the provision of MW schedules). Elia understands that the concern specifically relates to Technical Units with an active power in the range 1-25 MW (i.e., PGM Type B), and recalls that these units can already today choose to provide MW schedules on a voluntary basis via the T&amp;C Scheduling Agent, and that these schedules would also serve as the baseline for the mFRR activation control.</li> <li>• With respect to the proposal of FEBEG, Elia highlights that including the downward ramp in the activation period could improve the accuracy of the Last QH baseline for certain Delivery Points, but reduce the accuracy of the Last QH baseline for other Delivery Points (in particular for Delivery Points that do not have a constant offtake/injection profile). Indeed, in case the ramp-down is considered to be part of the activation period, the baseline for the second activation would be based on the measured offtake/injection at least 5 quarter hours before the quarter hour of the second activa-</li> </ul>
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			<p>tion. As discussed in Section 2.3 of the study, the literature provides clear evidence that MBMA baseline methodologies, such as Last QH, tend to provide a significantly lower accuracy in case there is a longer period in between the period used to determine the baseline and the period of the activation.</p> <p>* In case there is 1 quarter hour in between consecutive periods of full activation, the quarter hour prior to the quarter hour in which the activation request of the first activation is given is already used as the reference quarter hour for both activations.</p>
<p><i>Possibilities for market parties to propose or use their own baseline methodology</i></p>	<p><i>FEPEG</i></p>	<p>On part B FEPEG fully agrees that the option (as discussed in section 5.1) to create a process for FSP's to introduce their own baselines would not be workable. Seen the potential impact on balancing perimeters any new baseline would need to be studied rigorously. Launching these studies for potentially stand alone projects is not feasible.</p>	<p>Elia takes note of FEPEG's support for the conclusions presented in Section 5.1 of the baseline study.</p>
<p>Declarative baseline methodology for mFRR</p>	<p><i>CBS</i></p>	<p>CBS points out that in the iCAROS framework, generation assets ranging from 1-25 MW will not necessarily send MW but rather on/off schedules, that will therefore not automatically give a useable baseline.</p> <p>CBS does agree with Elia's reasoning on the use of schedules as potential declarative baselines, but asks for further clarification on the scope of iCAROS phase 2 regarding this aspect: for generation assets in the 1-25 MW range, CBS assumes that on/off schedules will be available, thereby not necessarily providing sufficient information to Elia to apply this as a mFRR declarative baseline. In that case, even with iCAROS phase 2, renewable generation assets able to provide mFRR volumes might not provide Elia with enough information if there is no declarative baseline available.</p>	<p>Elia clarifies that (as indicated in Section 5.3.2 of the study):</p> <ul style="list-style-type: none"> <li>• for Technical Units that are obliged to provide MW schedules or that provide MW schedules on a voluntary basis in the framework of the T&amp;C SA (i.e., the DP<sub>SU</sub>), the MW schedule de-facto forms a declarative baseline methodology (and this will remain unchanged);</li> <li>• for Technical Units that do not have a scheduling obligation (as of ICAROS phase 2, this concerns PGM/PPM/ESD &lt; 1 MW as well as demand facilities) and that do not provide MW schedules on a voluntary basis, the option is given to choose between the Last QH, the High X of Y and the new declarative baseline methodology;</li> <li>• for Technical Units that will have an obligation to provide either ON/OFF or MW schedules (as of ICAROS phase 2, this concerns</li> </ul>



		<p>CBS therefore asks Elia to clarify this point and, in case that not all renewable assets <math>\geq 1</math> MW would necessarily send MW schedules, points out that implementing a declarative baseline in mFRR for such assets would make sense.</p>	<p>PGM/PPM/ESD of type B with a nominal power between 1 and 25 MW) can choose to provide MW schedules (in which case the MW schedules serve as the baseline in line with the first bullet) or to provide ON/OFF schedules in which case either the Last QH or the High X of Y baseline methodology can be chosen.</p> <p>Elia reminds that in the current ICAROS design, PGM/PPM/ESD of type B have to possibility to be granted a derogation from the obligation to provide MW schedules when it is not possible for them provide MW schedules. In this regard, Elia considers that such a derogation cannot be justified in case the party demonstrates to be capable of providing accurate 15' MW forecasts by submitting a declarative baseline for mFRR.</p> <p>Elia has adapted the text accordingly to clarify this element of the study.</p> <p>Note that the current proposal is subject to the design for phase 2 of the ICAROS project.</p>
	<p><i>FEBEG</i></p>	<p>With regard of the developing declarative baselines for ToE DA/ID, CRM &amp; mFRR, or the development of real time baselines for aFRR with RES, FEBEG is aligned with the conclusions of Elia, with one nuance for mFRR: the introduction of a declarative baseline methodology is necessary (but not sufficient) to enable the participation of wind and solar PV.</p>	<p>Elia thanks FEBEG for the positive feedback and takes note of FEBEG's support for the main recommendations of the study.</p> <p>With respect to FEBEG's remark regarding the necessity of a declarative baseline methodology for mFRR to enable the participation of wind and solar PV, Elia understands that FEBEG considers the MW schedules submitted for DP<sub>SU</sub> by the SA as a form of a declarative baseline methodology that can already today be used to enable the participation of wind and solar PV.</p> <p>Regarding possible other barriers or enablers for the participation of wind and/or solar PV to mFRR, Elia reminds that the scope of this study is re-</p>

			stricted to the baseline methodology, but invites FEBEG to provide information on specific barriers/enablers directly in the discussions on the mFRR design.
	<i>CBS</i>	<p>CBS believes that for scheduling assets using declarative baselines in mFRR, the 25-min GCT for bid submission should be used as a lead time, instead of the 45-min lead time for schedules.</p> <p>CBS points out that there will be a discrepancy between the gate closure for submission of schedules (45 min) and of mFRR bids (25min), and asks Elia to consider allowing assets that would use a declarative baseline in mFRR to update their baseline up until the GCT of bid submission. This would increase the reliability of the baseline and would still be ahead of activation orders being sent, thereby limiting the risk of manipulation.</p>	<p>The proposed 45-min lead time had as purpose to ensure a maximum level playing field between DP<sub>SU</sub> and DP<sub>PG</sub>.</p> <p>Elia takes note of this remark of CBS and is willing to further discuss this remark in the context of ongoing discussions on the mFRR design (in particular related to the possibility to review the mFRR offered volume after 45-min before RT).</p> <p>For the proposed declarative baseline for DP<sub>PG</sub>, Elia aims to maximally align the design with the MW schedules used for DP<sub>SU</sub> in order to ensure a level playing field between all technologies. Elia has adapted the text to clarify this point.</p>
<i>Declarative baseline ToE DA/ID / CRM</i>	<i>CBS</i>	<p>CBS fully supports the introduction of measures to avoid manipulation of declarative baselines but insists that a workable balance has to be found e.g. allowing shorter lead times for submission in order to maintain the efficiency and interest in such baselines.</p> <p>For declarative baselines, manipulation should indeed be prevented, but not at the expense of a viable baseline. In that matter, the examples of the declarative baselines that were introduced in France for the NEBEF mechanism of RTE for demand response assets, or in mFRR in Germany for renewable technologies show the reality of this risk, since this resulted in having a baseline that could not be used.</p>	<p>Considering that the declarative baseline methodology proposed for mFRR can be submitted relatively close to real time, Elia understands that the response from CBS and Febeliec relates to the declarative baseline methodology proposed for ToE DA/ID and the CRM.</p> <p>For ToE DA/ID and the CRM, Elia understands the concern from CBS and Febeliec, but believes that requesting the baseline to be submitted two days in advance is the best possible compromise as there is a limited potential for other mitigation measures for these products. This for the following reasons:</p>

		<p>Also, CBS points out that having anti-manipulation measures should help allowing for more flexible options regarding the lead time of the baseline submission, typically allowing for closer to real time submissions to obtain more accurate baselines.</p>	
	<p><i>Febeliec</i></p>	<p>For Febeliec avoiding as much as possible any manipulation is a condition sine qua non, as this is the only way to guarantee trust from all participants in market functioning. However, it should be avoided that this point creates a strong entry barrier (e.g. because baselines need to be submitted long in advance, before market fundamentals are known) and potentially would hamper market players reactions to market price signals. Febeliec nevertheless understands that this combination of goals leads to trade-offs, a.o. because baselines still need to be workable and should not be overly complex. Febeliec is thus interested to get a better view on which mitigating measures could be taken to avoid market manipulation (e.g. ex post controls or checks), which would allow the application of innovative and flexible baseline methodologies and allow market participants to propose their own baselines yet at the same time safeguarding against manipulation to the detriment of trust in the overall system.</p> <p>Febeliec is of the impression that an ex ante opening towards flexible application of different baselines with an ex post validation of the absence of deliberate manipulation (and corresponding punitive actions in case such manipulation is discovered) could be an interesting approach to strike a good balance regarding the trade-offs that need to be considered.</p>	<ul style="list-style-type: none"> <li>• In contrast to mFRR where activations are difficult to anticipate, the decision to perform DA (and ID) activations and/or activations in the framework of the CRM could possibly be taken well in advance. Therefore, there is the possibility for FSPs to selectively manipulate the baseline only during moments they are effectively activated. As such, mitigation measures such as comparing the baseline to the measured offtake/injection outside periods of activation (as proposed for the declarative baseline for mFRR) is not sufficient for DA/ID and/or CRM activations.</li> <li>• Declarative baseline methodologies particularly form an alternative for assets that have an irregular offtake/injection pattern (making the High X of Y* baseline methodology insufficiently accurate). This irregular offtake/injection pattern makes it impossible to detect baseline manipulation ex-post.</li> </ul> <p>Elia also points out that the proposed timing for the submission of the baseline for ToE DA/ID and the CRM is among others based on the international benchmark and reflections with expert consultants on the most effective measures for manipulation.</p> <p>Moreover, the proposal to submit the baseline with a 2-day lead time is closer to real time compared to similar baseline methodologies in other countries, e.g., for the NEBEF mechanism in France, the baseline needs to be submitted minimally 2 days and up to one week in advance. Elia would like to highlight that the similar baseline methodology in the NEBEF mechanism in France is nevertheless used regularly (~30% of sites).</p>

<p>CRM Baseline</p>	<p>CBS</p>	<p>CBS points out that there should not be a “CRM baseline” as such, and that MWs engaged in the CRM should as much as possible be monitored using the baselines of the underlying products they are sold in (e.g. mFRR)</p> <p>CBS notes that Elia refers to a CRM baseline: in this matter, CBS recalls that most of the time, MWs engaged in the CRM will be using underlying market products (DA/ID scheduling or ToE, aFRR, mFRR) to make themselves available to the grid. As all of these products have baselines already available, CBS asks that as much as possible this baseline is used, and not an additional ad hoc CRM baseline.</p>	<p>Elia clarifies that there is effectively a baseline used in the CRM for Delivery Points that provide capacity through the potential for reduction of the offtake, as described in Section 9.4.3.2.3.3 of the CRM Functioning Rules.</p> <p>Elia furthermore highlights that the baseline used for the CRM is to a large extent aligned with the baseline used for participation to DA/ID markets via the Transfer of Energy Mechanism. This enables assets participating in the CRM to meet their capacity obligation via participation in the DA/ID markets while using the Transfer of Energy mechanism. With respect to ancillary services, Elia clarifies that a correction is performed in the CRM to account for volumes that are offered for ancillary services, as these volumes are not expected to react to market price signals. This correction corresponds to the volumes offered to ancillary services, corrected by the volumes activated. For more information on this correction, Elia refers to Section 9.4.3.2.3.1.2 of the CRM Functioning Rules.</p>
<p>Assets with self-consumption or other primary usage (in particular in aFRR)</p>	<p>CBS</p>	<p>CBS asks Elia to consider a specific solution for assets with self-consumption or other primary usage on site (in particular in aFRR), typically residential batteries, where a 1-min upfront declarative baseline will remain a blocker for participation of certain assets.</p> <p>Centrica confirms that some assets will remain in a blind spot, not being able to use declarative or calculated baselines in aFRR. This is particularly true for assets with highly volatile self-consumption or other primary use of the asset, that can't be predicted 1-min upfront (e.g. residential batteries). For such cases, CBS has developed a specific solution, based on a preliminary filter of the signal in order to remove all the non-aFRR consumption, thereby resulting in a clean signal that can be used to efficiently apply the standard 1-min declarative aFRR baseline. CBS is of course available to further present and discuss the details of this approach with Elia in order to assess its possible implementation.</p>	<p>Elia takes note of CBS' request for a solution for technologies that are primarily used to respond to other signals (e.g., residential batteries maximizing self-consumption). Elia reminds that, based on an agreement with stakeholders on the scope at the beginning of the study, Elia considers this out of scope of the study. Besides, Elia understands that CBS considers that this discussion will take place in the future.</p> <p>In this regard, Elia is open to further discuss this case, but has some questions regarding the actual need for a specific solution. This because Elia understands that the challenge concerns small assets, such as residential batteries, that would typically be offered in an aggregated way. Considering further that possible changes in the forecast in the minute between baseline submission and real time are expected to be distributed quite randomly, Elia expects that already with a reasonable level of aggregation, such errors would largely cancel out. In this regard, Elia recalls that the baseline test,</p>

			<p>baseline control, prequalification test and activation control all are performed or can be performed on an aggregated level. As an alternative in case a too high level of aggregation would be required to reduce such errors, Elia wonders whether delaying the response of the controller to the external signal (e.g., change in on-site PV generation or consumption) with one minute could form an alternative solution.</p>
<p><i>Possibilities for value stacking</i></p>	<p><i>Febeliec</i></p>	<p>Febeliec is also particularly interested in the possibility or facilitation of value stacking, as Febeliec wants to avoid that baseline methodologies would create an entry barrier for market players to participate in several markets at the same time (of course with correct allocation between those markets), as the opposite would lead to less efficient markets. Febeliec believes that this criterion merits a higher relevance in the analysis and in any case baseline methodologies that go against value stacking should be avoided as much as possible or mitigation measures should be implemented.</p>	<p>Elia agrees with Febeliec's intention to avoid that baseline methodologies would create an entry barrier for market players to participate in several markets at the same time.</p> <p>In this regard, Elia emphasizes that the possibilities for enabling value stacking was taken as one of the assessment criteria for the baseline methodologies in this study for this purpose. In the study (Section 3.3.5), Elia analyzed the impact of the baseline on the possibilities for value stacking and concluded that most baseline methodologies (at least in certain situations) face limitations resulting in inappropriate activation control/Transfer of Energy when one or more delivery points are activated simultaneously (or sequentially) for different services. However, as discussed in the study, these issues could (in theory) be resolved, for instance via a coordinated settlement/activation control mechanisms and not by simply replacing existing baseline methodologies by new ones. For this reason, a low weight is given to this criterion in assessing the different baseline methodologies.</p> <p>Elia further highlights that a full analysis of the potential solutions for enabling value stacking (e.g., via coordinated settlement/activation control mechanisms) is out of the scope of this study, but will be addressed in detail in the context of a study performed in 2022.</p> <p>Finally, Elia also stresses that the main recommendations of the study correspond to proposing the introduction of new baseline methodologies, and</p>

			<p>as such provide additional options for enabling value stacking in the future, also considering that the proposed new baseline methodologies score well in terms of the possibilities for enabling value stacking.</p>
<p><i>Baseline FCR</i></p>	<p><i>CBS</i></p>	<p>Finally, CBS recalls that developing new approaches (including the solution for self-consumption or other primary use assets) would benefit to FCR as well, where the next steps of the harmonization process with regards to baselining among FCR cooperation members seems to be in a dead-end.</p> <p>CBS asks Elia to further consider the possibility of extending this study and the implementation plan to FCR baselines, even if this currently is out of scope. Discussions on the next wave of harmonization of the FCR product at the FCR Cooperation level, which was to encompass baselining, seem to be stuck, without any communication nor consultation of market parties since 2019.</p> <p>This has led to significantly delaying the possibility to further improve the FCR baseline in Belgium. Given the absence of visibility on both the timing and the content of this next wave of harmonization, CBS asks Elia to reconsider an update of the FCR baseline in Belgium, without waiting for the FCR Cooperation’s next steps. This would enhance the workability and efficiency of the baseline, both for Elia and the BSPs, especially for the roll out of new assets like residential batteries or renewables, that could be used more actively in the FCR product with a more appropriate baseline available</p>	<p>Elia recalls that baselining for FCR is out of scope of the present study and that reconsidering the scope of the study in this phase is no longer possible. However, Elia is open to further discuss the challenges for FCR. In this regard, the insights and recommendations of the present study could also serve future discussions regarding the FCR baseline.</p>

## 5. Next steps

On the basis of the feedback received from market players and Elia's response, as set out in this consultation report, Elia has finalized its study on baseline methodologies.

The final study, together with the consultation report and the implementation plan will be finally submitted to the CREG before December 23, 2021.

## 6. Attachments

### Contact

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