

**A new answer to the consultation "PUBLIC CONSULTATION ON THE THREE MODIFICATIONS OF THE TERMS AND CONDITIONS FOR THE SCHEDULLING AGENT FOLLOWING THE RETURN OF EXPERIENCE OF PHASE 1 OF THE ICAROS PROJECT" has been submitted on our website.**

- **Name:** Jasper Vermandere
- **Email:** [jasper@yuso.com](mailto:jasper@yuso.com)
- **Organization:** YUSO
- **Comments/suggestions to the consultation:** \*YUSO's feedback on 'Inclusion of the FCR Requested in the return to Daily Schedule control'\*

YUSO welcomes the correction to the T&C SA for FCR during a RTS and agrees the solution should align with the solutions already in place for aFRR and mFRR.

YUSO agrees with the proposed solution, although it is still missing a crucial element for LER.

LERs also need to comply with an EMS approved by Elia (for both FCR and aFRR), which can't be executed during a RTS event, because the necessary actions can't be executed anymore: 1) intraday updates to the daily schedule are rejected during this period and 2) the schedule needs to be followed so the LER can't use reactive balancing to manage energy content.

In other words, during an RTS event there is no way for the BSP to follow its EMS to ensure sufficient energy capacity to continue the delivery of the ancillary service (FCR or aFRR).

Therefore, YUSO kindly asks Elia to thoroughly investigate this issue during this consultation phase, as it here is again a clear conflict between T&C BSP (following the EMS rules) and T&C SA (following the RTS rules).

YUSO proposes that Elia exempts BSPs from FCR and aFRR activation control penalties for all affected quarterhours in which intraday schedule updates are rejected due to congestion management measures.

In this way, Elia will show clear preference for congestion management services from the SA during a period with high congestion risk, while balancing services can still be delivered, although only to the point the LER's energy content allows for.

Given the low frequency of RTS events, there should still be sufficient incentive for the BSP to deliver high quality aFRR/FCR outside of these RTS periods.

In the case Elia would notice very low quality aFRR/FCR delivery during these RTS periods, Elia could request the BSP to proof in an ex post manner that the energy content didn't allow correct delivery.

- **Upload additional documents if needed:**
- **Answer confidential:** Completely non-confidential