CONSULTATION REPORT

Report on the public consultation regarding the Proposal for Amendment to the T&C BSP FCR

16/07/2025

Contents

1. Introduction

Elia organized a public consultation from May 28th to June 30th regarding the Proposal for Amendment to the T&C BSP FCR.

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 following non-confidential replies from the following parties:

- Bnewable
- Centrica
- Febeg
- Febeliec
- Fluvius
- Yuso

All responses received have been appended to this report. These reactions, together with this consultation report, will be made available on Elia's website.

3. Instructions for reading this document

This consultation report is structured as follows:

- Section 1 contains the introductory context,
- Section 2 gives a brief 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 proposal submitted for consultation, the reactions received from the market participants (annexed to this document) and final proposal.

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

Subject/Article/Title	Stakeholder	Comment	Justification
A	B	C	D

A. Subject matter covered by the various responses received.
B. It is indicated who made 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.
    - In doing so, an attempt was made to list/consolidate all comments received and to argue whether or not they should be taken into account.
    - 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 term have been uniformed to make them easier to read.
    - For clarification purposes, it is recommended to always include the original comment of the stakeholder concerned, as included in the appendix to this report.
D. This column contains Elia's arguments as to why a comment was or was not included in the final proposal. However, this column does not contain the final text. For this purpose, the final proposal must be consulted.

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
Overall feed-back	Bnewable	Bnewable appreciates efforts undertaken by Elia to harmonize re-porting on FCR and aFRR, among others the switch to a common 4 second reporting granularity and the use of a declarative baseline.	Elia thanks Bnewable for the support of the harmonization
	Centrica	Centrica welcomes the opportunity to provide feedback on your consultations on the three amended Terms and Conditions for Bal-ancing Service Providers (T&C BSP FCR, aFRR, and mFRR). Our overarching feedback is structured around the following areas: · We support the self-billing process and request sufficient time and training for BSPs to onboard new processes and systems. · We welcome the declarative FCR baseline and the adapted nor-malisation factor,and highlight the need to further align FCR and aFRR designs. · We support continuous monitoring and activation control, and raise concerns on slower-reacting assets and outer frequency	Elia thanks Centrica for the feedback and refers to the detailed answers below on the individual points.

		bands. · We welcome the improvement of aFRR/mFRR and FCR/aFRR combos, insisting on the need for transparent error allocation. · We support the migration to RTCP/Flexhub and request clarification regarding low-voltage (LV) assets, the EMS, and the activation indicator DP_FCR. · We urge Elia to preserve the possibility to aggregate flexibility from LV assets when switching to the LV Delivery Point Group concept. · We request a detailed roadmap with concrete go-live dates and sufficient time for implementation. We are aware of the complexity of these developments and trust that Elia will consider the industry's different points of view. We look forward to further discuss these matters with you and are happy to provide additional information.	
Roadmap and go-live planning	Centrica	We request a detailed roadmap with concrete go-live dates and sufficient time for implementation Elia's proposed changes are significant and require extensive implementation efforts. Technical, operational, and commercial readiness of market participants is essential for a successful go-live. While acknowledging the need for change, we express concerns about the unclear timeline and phased approach. To enable effective planning and avoid any operational disruption, we emphasize the need for a detailed roadmap	An implementation planning is communicated in section 3 of the explanatory note on the public consultation for T&C BSP FCR, aFRR and mFRR. Elia acknowledges that this planning does not contain specific go-live dates. With respect to the amendments related to the settlement processes and the amendments related to the T&C BSP FCR, an indicative planning has been presented in the Working Group En-

		with concrete go-live dates and sufficient time for implementation. We also require the timely publication of technical documentation needed to estimate IT costs and to plan developments.	ergy Solutions of 19th of June, 2025. Further updates and confirmation on the implementation dates will be communicated as soon as possible. With respect to the timely publication of the technical documentation, Elia acknowledges the need indicated by Centrica and will make a best effort to publish the technical documentation sufficiently in advance.
	Febeg	Implementation Plan FEBEG understands some changes are required but calls the attention of Elia for a high need of planification and large enough lead time to implement those necessary changes (e.g. declarative baseline does not exist today in FCR). We would like to emphasize that IT resources are already allocated to other developments and new requirements cannot be put with the highest priority at the expense of other projects. Hence, we do ask for a swift and pragmatic implementation plan where the co-existence of old and new requirements (more specifically for (i) the mandatory declarative baseline, (ii) the new prequalification test and (iii) ICCP/TASE2 to be replaced by RTCP/Flexhub) would be allowed during a 'transition phase'.	An implementation planning is communicated in section 3 of the explanatory note on the public consultation for T&C BSP FCR, aFRR and mFRR. Elia acknowledges that this planning does not contain specific go-live dates. With respect to the amendments related to the settlement processes and the amendments related to the T&C BSP FCR, an indicative planning has been presented in the Working Group Energy Solutions of 19th of June, 2025. Further updates and confirmation on the implementation dates will be communicated as soon as possible. With respect to the need for a pragmatic implementation plan, Elia understands the need and will make a best effort to facilitate the transition between the old and new requirements.

4.2 Specific comments received during the public consultation

SUBJECT	STAKEHOLDER	FEEDBACK RECEIVED	ELIA'S VIEW
Amendments relative to the settlement and invoices processes	Centrica	We support the self-billing process and request sufficient time and training for BSPs to onboard new processes and systems We support the introduction of the self-billing process outlined in the T&C BSP FCR, aFRR, and mFRR, as it promises to streamline operations and reduce payment timelines. However, we emphasize the need for data accuracy, a robust dispute resolution process to avoid incorrect settlements, and sufficient time to onboard new processes and systems. The implementation workload for BSPs to be ready by Q4 2025 is significant and includes onboarding EPIC, training, implementation of approval and rejection processes, testing, and parallel runs	Elia recognizes the significant implementation workload for BSPs and appreciates the feedback received. Since the initiation of the incentive end of 2024, we have actively engaged with BSPs through workshops to introduce the new processes and the foreseen financial documents. Detailed information, including implementation plan and roadmap, was provided during these workshops and feedback was solicited on multiple occasions. The onboarding process on EPIC for BSPs started at the end of May and API specifications were provided early June to help BSPs prepare for upcoming testing sessions foreseen in September. Also training sessions are scheduled for September 2025, with a parallel run planned for October 2025. The go-live is anticipated in November 2025. We are committed to supporting BSPs in adapting to the new processes and are open for further suggestions on specific aspects that might still need attention. Our common priority

			is to ensure a smooth and successful transition while staying on track for the planned go-live.
	Febeg	Invoicing & settlement All in all, FEBEG welcomes the initiative to improve invoicing and settlement. We consider that these are interesting evolutions although other topics (e.g. improve the design of penalties) have higher priorities for FEBEG. While faster settlement is desirable in most of the cases, FEBEG wants to highlight that T&C's should not strictly impose inflexible deadlines and processes. There will always be specific cases which require ad-hoc (and sometimes more time-consuming) exchanges and FEBEG believes that it should remain possible to have bilateral discussions TSO- BSP in order to allow for a mutual understanding and to avoid undue payments. In this spirit, we do not support the following sentence which pleads for a very strict and inflexible guideline irrespective of the situation "If no agreement is found however, Elia will notify the CREG of the failed negotiation and will issue self-bills, self-bill credit notes and Elia invoices based on the initial report figures." FEBEG proposes to include the following track change and asks: "If no agreement is found however, Elia may notify the CREG of the failed negotiation and may issue self-bills, self-bill credit notes and Elia invoices based on the initial report figures. Elia will notify the CREG automatically, only if it considers the negotiations are unreasonably taking too much time" As far as the payment terms, FEBEG supports the willingness to align	1/ Elia can agree with the proposed comments and values the spirit of collaboration in resolving issues. We agree with the suggested text changes in art. II.17.6 (2nd bullet point), with some minor modifications : "ELIA may inform the CREG of the situation, including contact details of the BSP, a summary of the context (including previous steps and timings) and the disputed amount, and a summary why no agreement could have been reached after this time. Elia will inform the CREG if it considers the negotiations are unreasonably taking too much time; and " 2/ Regarding payment terms, Elia emphasizes that the proposed 15-calendar-day term will only begin following the issuance of financial documents, which occurs after the settlement reporting is approved by the BSP in EPIC. 3/ Elia recognizes the need for a pragmatic approach from all parties involved, particularly in the post-go-live phase.

		T&C's BSP with T&C BRP. In a vast majority of the cases, the proposed term of 15 calendar days will not be an issue. However, FEBEG wants to pay specific attention to the specific cases which require bilateral exchanges and thorough investigations. Each party should remain flexible to account for the specificity of a situation. Lastly, FEBEG wishes to remind that faster settlement and shorter payment terms rely on tools being state of the art and no IT bugs. In reality, there is always something which can explain why it takes more time than expected. Here we think about the first days following a go-live, an IT release, the correct understanding of updated T&C's, new behaviors of dispatching, etc. This makes that a pragmatic approach and mindset is often required.	
	Yuso	On BSP Faster Settlement: "With the dispute period being 60 CD before triggering invoicing we notice that it's set on a decent time schedule, which is good. However then we also expect that it can be resolved within this timeframe which sometimes isn't the case at present time, giving us a slight, potential disadvantage in the discussions."	Elia is committed to finding collaborative solutions and will make every effort to resolve disputes within the proposed timeframe. While the timeline remains unchanged, we maintain our philosophy of cooperation, consistent with our current practices. If resolving the issue within the timeframe becomes difficult, our commitment to working together will stay strong.
Amendments relative to the introduction of a	Bnewable	We are however against the introduction of yet another test with the new "Baseline test". Prequalifying for FCR is already today an endeavor requiring a significant number of steps/integrations/tests:	Elia understands the addition of the baseline test is another step in the prequalification process. However, with the introduction of a declarative baseline, the accuracy of the control

mandatory declarative baseline		- Signing of the FCR contract - Submission of an Energy Management Strategy per Delivery Point/Group (description + simulation) - Obtaining the Connection Contract Check (DSO) - Integration with ICCP/TASE2 for real-time communication (RTCP in the future) - Conducting the communication test - Conducting the prequalification test - Integration with the ATP for the Availability Tests - Integration with Regelleistung for FCR bidding - Integration with BMAP for FCR Nominations - Submission of a simulation for the Reserve Mode These numerous steps result in an important entry barrier for new players, limiting the number of market parties in FCR and thus the efficient functioning of the market at Belgian level. Adding one more step in the prequalifcation process worsens the current entry barrier.	mechanisms becomes dependent on the accuracy of the baseline. Elia believes it to be vital to have a control mechanism that verifies the BSP's ability to provide Elia with an accurate baseline. This would be the case even if there would be no ex-ante prequalification test. Elia aims to limit the impact of the baseline test by aligning the baseline methodology of FCR and aFRR, so that no separate baseline test is required for both products.
	Centrica	We welcome the declarative FCR baseline and the adapted normalisation factor, and highlight the need to further align FCR and aFRR designs We support the introduction of the declarative FCR baseline proposed in the T&C BSP FCR, which will facilitate the simultaneous delivery of FCR and aFRR, as well as continuous activation control. We also support the adapted normalization factor for the baseline	Elia thanks Centrica for the support of the declarative baseline methodology. With respect to the possibility to use a real-time baseline for FCR, Elia previously did not identify a clear need for the real-time baseline possibility for FCR and therefore did not include it in the proposed amendments. However, Elia does

		test as described in the T&C BSP FCR and aFRR, which facilitates the participation of assets with a reference baseline close to zero, such as batteries. Finally, we emphasize the need for a common baseline test for both aFRR and FCR to ensure consistency. We also call for the introduction of a calculated real-time baseline in FCR to align with the aFRR design, where this option already considers the variability of certain assets.	agree that alignment between the FCR and aFRR methodologies further facilitates the combo delivery of the products. Therefore, Elia has included the possibility for BSPs to request the use of a real-time baseline in the proposed amendments for the T&C BSP FCR and one single baseline test can be sufficient for both FCR and aFRR products.
	Febeg	Amendments about the introduction of a mandatory declarative baseline FEBEG understands the need to move to a declarative baseline which will bring more accuracy in general. We only fear that this will come with costly mandatory implementation and ask Elia to keep the requirements as light as possible and do not impose inflexible and tight deadlines to the market participants (see also remarks on implementation plan below). Also, FEBEG asks Elia to keep the door open for a grace period in case of communication issues	Elia acknowledges the need for a clear implementation plan and sufficient testing possibilities for BSP ahead of the go-live date. Elia understands the new baseline methodology requires development for existing BSPs and will make a best effort to support the BSPs in this transition.
	Febeliec	Regarding the baseline tests, Febeliec is not opposed in principle against such test insofar this does not introduce a barrier to entry in the prequalification tests.	Elia understands the addition of the baseline test is another step in the prequalification process. However, with the introduction of a declarative baseline, the accuracy of the control mechanisms becomes dependent on the accuracy of the baseline. Elia believes it to be vital to have a control mechanism that verifies the BSP's ability to provide Elia with an accurate baseline. This would be the case even if there would

			be no ex-ante prequalification test. Elia aims to limit the impact of the baseline test by aligning the baseline methodology of FCR and aFRR, so that no separate baseline test is required for both products. As mentioned previously in the consultation report, Elia would be open to analyze the possibilities towards an in-the-market prequalification. However, Elia would like to have clarity on the requirements following from the implementation of the network code demand response. For that reason, Elia has indicated to work on the prequalification procedures as part of the balancing roadmap as of 2026 (cfr. the work in the cluster to lower the barriers of both implicit and explicit flexibility).
	Yuso	To further align the FCR baseline methodology with that of aFRR, we encourage Elia to also include, within the new FCR design, the explicit possibility for BSPs to request the use of a real-time baseline. The aFRR framework currently allows for such requests under specific justified circumstances.	Elia previously did not identify a clear need for the real-time baseline possibility for FCR and therefore did not include it in the proposed amendments. However, Elia does agree that alignment between the FCR and aFRR methodologies further facilitates the combo delivery of the products. Therefore, Elia

			has included the possibility for BSPs to request the use of a real-time baseline in the proposed amendments for the T&C BSP FCR.
	Yuso	Can a common baseline test be executed for FCR and AFRR with the same delivery point(s), in order to reduce the BSP prequalification procedure?	Elia confirms that a baseline test can be valid for both FCR and aFRR and a Delivery Point that provides both Services should not participate in two baseline tests, with the precondition that all Delivery Points participating in the baseline test are registered for both FCR/aFRR.
Amendments relative to Continuous Monitoring, Continuous Activation Control & incentives	Bnewable	We would also like to react to the amendments regarding the Continuous Monitoring and in particular the Corridor Approach. Despite our best efforts we feel that the mathematical formulation are hard to understand and sometimes confusing. For example, on page 101 the Lower Linear Limit (LLL) and Upper Linear Limit (ULL) are defined as functions of LL and UL, without defining LL and UL first. Regarding LLL and ULL, it is also not clear to us why the nested delays (first as τ and then as k, taking first a minimum and then a maximum) are needed. Also on p101, regarding the figures: - We are not sure what is depicted, is it ULL and LLL? - We are not sure over what index the Min and Max are applied.	Elia takes note of the need for clarifications and has made small modifications to the phrasing in the T&C to provide more clarity to the BSPs. Elia welcomes Bnewable to explain in more detail where more clarifications are required (i.e. in context of the update of the Design Note).

		Globally, the paragraphs 2.3.1.2 and 2.3.1.3 are quite obscure to us from the mathematical point of view even though we understand the general intention. We have also noticed differences in the formulas between the Explanatory Note and the Amended T&C, which make the understanding harder. As a BSP we believe it is important that the concepts are clearly defined and understood by FCR suppliers and therefore kindly ask Elia to provide an updated documentation that would be easier to comprehend (with maybe more explanations between the mathematical formulas). We are happy to organize a call to explain in more detail what we are struggling to understand.	
	Centrica	We support continuous monitoring and activation control, and raise concerns on slower-reacting assets and outer frequency bands. We support the continuous monitoring and activation control proposed in the T&C BSP FCR, which increases transparency and reduces the risk of significant penalties due to random sampling. However, we raise concerns about the potential complexity introduced by derogations for slower-reacting assets ('Additional Properties') and disparities between the monitoring of inner and outer frequency bands. We invite Elia to provide detailed guidelines and examples to better evaluate the impact of the new monitoring and activation control rules, covering various use cases.	Elia thanks Centrica for the support on the proposal for continuous monitoring and activation control. Elia is aware of the added complexity due to derogations and the effect on the calculation of the inner and outer frequency bands and has complemented the T&C BSP FCR to clarify how such derogations would be considered in the formulas of the proposed activation control. Elia has provided detailed guidelines through the T&C BSP FCR and the explanatory note and has made some corrections with the aim to improve the clarity of these documents. Elia invites Centrica to contact Elia in case of remaining questions.

	Febeg	Amendments about Monitoring, Activation Control & Incentives FEBEG understands the need to monitor the accuracy of the service and considers it is a logical evolution. At this stage, it is complex to say whether the activation control and Incentives evolution are correctly designed, not leading to an unjustified increase of penalties (Elia referring to "Incentives"). In multiple consultations, WG and ad-hoc discussions, FEBEG members have consistently expressed their concerns about the penalty regime which can be inappropriate and create barriers to participate. While we cannot express the clear impacts those evolutions will have, we want to ask Elia to remain open for changes in the future would those evolutions bring undesired effects in general. Here, we mainly think about leaving the possibility to lower the penalty factor (currently proposed at 1.2).	Regarding the "correct" design of the activation control and related incentives, Elia points to the analysis provided during the workshop which concludes that in the proposed design, the incentives are much closely linked to the actual underdelivery of FCR. This means the related incentives are fairer and more accurate than with the current design. Elia also refers to the availability tests as an additional control mechanism to monitor the availability of the contracted capacity. However, Elia acknowledges the need for follow-up of the incentive design and keeps the possibility for adaptations to further improve the design if needed. In addition, Elia is in favour of a common approach for the application of such incentives in the FCR Cooperation to ensure a level playing field. The evolution towards a continuous monitoring based on principles agreed in the FCR Cooperation is a first step in this direction.
Amendments relative to Error Attribution during combo delivery of FCR and aFRR	Centrica	We welcome the improvement of aFRR/mFRR and FCR/aFRR combos, insisting on the need for transparent error allocation We also welcome the improvements to the FCR/aFRR combo and understand that Elia proposes to allocate errors primarily to aFRR, revise the design of the tolerance bands, and use the Tetris algorithm for volume allocation.	Elia thanks Centrica for the support of the improvements regarding the FCR/aFRR combo. Elia believes the proposed amendments improve the fairness and transparency regarding error allocation during FCR/aFRR combo activations as the proposed methodology, allocation of the error to aFRR, is

		However, we insist on the need for fair and transparent error allocation in case of FCR/aFRR combo activations and welcome concrete examples evidencing that contributions of each service are accurately reflected, that BSPs are not unfairly penalized compared to a separate delivery of the services, and that availability tests triggered for one service do not impact the other.	best practice in the FCR Cooperation. Elia has provided concrete examples of the error attribution in the annex of the explanatory note. Regarding the impact of availability tests during combo delivery, there are two possible scenarios: An FCR availability test is triggered, and the aFRR activation control / error attribution functions as during normal operation. As such, Elia considers that an availability test for FCR does not impact the delivery of the other service or that the delivery of the aFRR Service would impact the FCR availability test. However, Elia has noted the FCR Activation Control should exclude the period in which an FCR availability test is performed and has included this provision to the T&C BSP FCR. An aFRR availability test is triggered. It must be noted that the Delivery Points involved in the aFRR availability test can exclusively participate to the availability test and are excluded from delivering the regular aFRR Service (Art. II.14.5). As a result, there is no impact on the aFRR activation control. Using the proposed error attribution methodology, there is

			also no impact on the FCR Activation Control with the error being assumed on aFRR for the Delivery Points providing both Services. In case Delivery Points participating to both services are included in the contracted aFRR Energy Bid that is activated for an aFRR availability test, there is a possibility that the FCR delivery has an impact on the result of the aFRR availability test. In such a case, Elia refers to the procedure in Annex 12.D of the T&C BSP aFRR, where the BSP can request to apply different baseline values during the availability test provided a sufficient justification is given. Elia considers that the particular case where a Delivery Point participating to both the aFRR and FCR Service and where the contracted aFRR Energy Bid including this Delivery Point was activated for an aFRR availability test at the same time as providing FCR in response to a frequency deviation could provide (depending on the direction of the FCR activation) a sufficient justification to adapt the baseline.
Amendments relative to the Prequalification test	Bnewable	A last remark is on the Amendments to the Prequalification test phase 1 where Elia proposes to remove the 5 seconds tolerance. This would mark a difference with normal FCR delivery where 2 seconds (or more in case of derogation) are tolerated for assets to start react-	In phase I, the BSP is expected to follow a profile based on frequency steps of 50mHz. Between each step, the BSP has 7.5s to reach the expected FCR for that step. This ramp rate is equal to the minimum ramp rate required to reach 50% ac-

		ing to a frequency deviation (as long as the reaction delay is not artificial). If one takes the Figure "accepted response of FCR Provider to change in frequencies" shared by Elia in the Explanatory Note, the expected reaction at 25% after 7,5 seconds (without the 5 sec tolerance) is above the line separating the green and yellow areas. As such, the FCR prequalification requirements would exceed the FCR delivery requirements. We believe they should remain aligned as the purpose of FCR PQ is to check whether an asset matches the requirements for FCR delivery. Therefore, a reacting time tolerance should be kept in the PQ test.	tivation in 15s and 100% activation in 30s. The 2s delay during normal FCR Delivery is required to provide the BSP with time to process the frequency measurements, calculate the required reaction and send the signal to the asset. This is not needed when following a predetermined profile. Therefore, Elia has the opinion that the proposed requirements of the prequalification test do not exceed the FCR delivery requirements.
	Febeg	Amendments of the prequalification tests FEBEG takes note of the proposed evolution of the prequalification test. While we understand the need to take a prequalification test, we ask Elia to avoid complexity certainly in the transition phase from old to new test. Concretely, assets which aim to be prequalified in the coming months had to/ will have to make the necessary developments following the current requirements. They should not be asked to take the new prequalification test (and implement the associated requirements) if they succeeded the 'old' prequalification test. This remark is also to be included in the larger discussions about barriers to participate to explicit flexibility.	Elia takes note of FEBEGs comment. Elia does not believe however that there is a need for assets to make developments to pass the proposed prequalification test instead of the current prequalification test as the proposed modifications to phase I, especially the removal of the 5s of tolerated delay, are in line with the FCR requirements. Additionally, Elia's analysis of the switch to 12s averages does not show a noticeable impact on previous successful prequalification tests. The modification to phase II should not demand any new developments for the BSP, as this phase is an evaluation of the

			actual FCR delivery and requirements for FCR delivery remain the same.
Amendments relative to the migration of real-time communication requirements towards RTCP/Flexhub	Bnewable	Regarding the migration of real-time data exchange to RTCP/Flexhub and the change in granularity, we would appreciate more information from Elia on when this change will take place and the potential parallel run period to better foresee this change in our roadmap.	Elia acknowledges the need for a clear timeline ahead of the migration in order to facilitate the implementation for BSPs. The possibility of a parallel run is being investigated by Elia and further details will be communicated as soon as possible.
	Centrica	We support the migration to RTCP/Flexhub and request clarification regarding low-voltage assets, the EMS, and the activation indicator DP_FCR We support the migration to RTCP and Flexhub and the harmonization of data granularity in the T&C BSP FCR, which will lower costs and reduce entry barriers. We invite Elia to clarify the expected impact of the new data granularity on low-voltage assets, which currently provide data with a specific granularity, as well as the expected impact of the DP_CH-DCH removal on the EMS. Finally, we highlight the possible presence of more volatile assets in the portfolio which deliver FCR in case of extreme frequency deviations and should not lead to penalties during small frequency changes. We ask Elia to confirm the introduction of an activation indicator DP_FCR to identify which DPs to consider for activation control, similar to the aFRR design.	Elia thanks Centrica for the support regarding the migration to RTCP/Flexhub. there will be a change in the data granularity Elia expects from BSPs. BSPs currently can aggregate individual Delivery Point data in a Virtual Delivery Point and send it through SCADA2SCADA to Elia. With the migration to RTCP/Flexhub, BSPs will be expected to deliver individual data for **all DPs** through Flexhub, including individual data for LV DPs, which could previously be aggregated in Virtual Delivery Points. Additionally, Elia will change the required data granularity from 2 seconds to 4 seconds. Therefore, the impact of requesting individual data per DP by Elia is estimated to be limited. With the migration to RTCP/Flexhub, Elia reduces the real-time communication requirements to the BSP.

			The amendment to introduce the Low-voltage Delivery Point Group concept is proposed due to alignment with aFRR and to limit the required development in the Flexhub environment. With the removal of DP_CH-DCH and the addition of the declarative baseline, BSPs need to adapt their EMS to include the 60s delay in the baseline methodology. This should have limited impact on the EMS strategy of BSPs, mostly on EMS measures based on reactive balancing which can only be an additional strategy for reservoir management. Elia confirms the introduction of DP_FCR, through which the BSP identifies which assets of its pool are participating to the FCR delivery, as it is for aFRR.
	Yuso	A well-defined transition timeline from ICCP/TASE2 to RTCP/Flexhub is essential to ensure that BSPs can adapt their systems, perform thorough testing, and avoid operational disruptions. We request Elia provide a detailed migration timeline with at least 3 months advance notice before mandatory transition to RTCP/Flexhub	Elia understands and takes note of Yuso's request regarding a clear migration timeline and will communicate this with sufficient lead time.
Amendments relative to FCR	Centrica	We urge Elia to preserve the possibility to aggregate flexibility from low-voltage assets when switching to the LV Delivery Point Group concept We believe that Virtual Delivery Points are key to providing	Elia understands the need to aggregate flexibility from low-voltage assets. This does not change with the switch to the

Low Voltage Delivery Point groups		aggregated flexibility from LV assets. The switch to the LV Delivery Point Group concept suggested in the T&C BSP FCR must preserve this possibility. We also question whether the removal of the 1.5 MW volume limit could impact the reliability of FCR delivery from BSPs relying on central frequency measures and control logic (e.g., in case of communication failure or frequency splits described in the Additional Properties and SOGL).	LV Delivery Point Group concept as LV Delivery Points can still be aggregated together. The proposed change from Virtual Delivery Points to the Low-voltage Delivery Point Group concept is proposed due to alignment with aFRR and to limit the required development in the Flexhub environment. Since the data of the LV Delivery Points is aggregated in Flexhub before being sent to Elia, there is no difference in how the concepts are used within the FCR Design. However, with the proposed design, the BSP must send individual data of Delivery Points to Flexhub, where the data is aggregated in LVDPGs before being used by Elia. Previously, the BSP could send aggregated data per Virtual Delivery Point via the SCADA2SCADA connection. Additionally, Elia will change the required data granularity from 2 seconds to 4 seconds. Therefore, the impact of requesting individual data per DP by Elia is estimated to be limited. The introduction of LVDPGs does not impact the system split requirements as the requirements remain the same. A frequency meter can be shared between Delivery Points if they are in the same electrical zone and the combined contribution does not exceed 1.5MW.

	Fluvius	Virtueel Leveringspunt: de definitie hiervan is verwijderd, maar deze term wordt wel nog vaak in het document gebruikt. Kan hier gebruik gemaakt worden van de terminologie in de Network Code Demand Response, bijvoorbeeld 'SPU''service providing unit' or 'SPU' means a single controllable unit or an ensemble of controllable units connected to a single connection point. SPU is defined by the service provider to provide balancing or local services;	Elia thanks Fluvius for noticing the error in the Dutch version of the T&C BSP FCR. The link to Virtual Delivery Points is removed from the Dutch version of the T&C to align the translations.
	Fluvius	In deze artikels (II.3.14 tot en met II.3.17) wordt er enkel vermeld hoe Laagspanningspunten aangemeld kunnen worden. Dient er ook niet vermeld te worden hoe MV punten moeten worden	Elia would like to clarify that Articles II.3.14 to II.3.17 do not define how Delivery Points on low voltage level need to be registered (similar to how the T&C BSP FCR do not define the process for Delivery Points on medium voltage level). Instead, these articles describe the specific requirements applicable for Delivery Points on low-voltage level (e.g., that those Delivery Points need to be included in an FCR Low-Voltage Delivery Point Group) and describe the specific process for creating/modifying the list of FCR Low-Voltage Delivery Point Groups (note that this process refers to the creation/modification of FCR Delivery Point Groups and not on the process of changing the Delivery points on low-voltage level within this group).

	Fluvius	Annex 3.C Frequentiemetingen :“Voor een Leveringspunt op het Publieke Distributienet volstaat één frequentiemeter voor meerdere Leveringspiunten, indien de totale volume minder of gelijk aan 1.5MW is, en de Leveringspunten zich binnen dezelfde Elektrische Zone bevinden.. De BSP mag beslissen waar hij de frequentiemeter van het Virtuele Leveringspunt zal plaatsen.” - Van waar komt de 1.5 MW? - Waarom wordt er over volume gesproken? - Er is een link naar het Virtuele Leveringspunt, maar daar is geen definitie meer van. - Bedoeld men met de frequentiemeter de Gateway?	Elia thanks Fluvius for noticing the error in the Dutch version of the T&C BSP FCR. The link to Virtual Delivery Points is removed from the Dutch version of the T&C to align the translations. The 1.5MW stems from the maximum volume of the previously used concept of Virtual Delivery Point. Since it is not Elia’s intention to alter the requirements regarding frequency measurements, the 1.5MW is used even when the concept of Virtual Delivery Point is removed. The reason to link frequency measurements to volume is to avoid having a centralized controller with a large volume of steered assets based on a single frequency meter, as this imposes a risk of improper FCR reaction during a system split. Having multiple set of measurements mitigates this risk as this helps detect a system split in the BSP’s pool. Elia does not refer to the Gateway, but to the frequency meter(s) on which measurements the BSP bases the calculation of it’s FCR reaction.
	Fluvius	De lijst van mFRR groepen van LS leveringspunten zal steeds wijzigen. Het heeft dan ook weinig zin die in de T&C op te nemen.	Elia wishes to clarify that Annex 4.D is purely about the FCR Delivery Point Groups (i.e., the containers) and not about the

		Voorstel: artikel 4.D schrappen	designation (or changes thereof) of Delivery Points on low-voltage to such FCR Delivery Point Groups.
Definitions	Fluvius	"Pool: De volledige lijst van Leveringspunten die door de BSP in het BSP Contract FCR of in het FSP-DSO-Contract opgenomen zijn;" In het FSP-DSO-Contract vermelden we geen lijst van Leveringspunten, wel hoe de pool geraadpleegd kan worden. Voorstel: Verwijzen naar de definitie in het FSP-DNB contract of deze overnemen: Pool: geheel van de Dienstverleningspunten voor flexibiliteit die de FSP mag activeren in het kader van de flexibiliteitsdiensten	Elia understands that the FSP-DSO Contract specifies the stipulations for adding /amending/removing Delivery Points connected to a Public Distribution Grid from the pool of the BSP. As such, Elia does not see a need to amend the definition of "Pool".
	Fluvius	Art. II.11.5: "Voor elk kwartier kan de BSP kiezen welke Leveringspunten, vermeld in Annex 4 of in het FSP-DSO-Contract, worden opgenomen in de FCR-Energiebieding" Leveringspunten zijn niet opgenomen in het FSP-DSO	Elia understands that the FSP-DSO Contract specifies the stipulations for adding /amending/removing Delivery Points connected to a Public Distribution Grid from the pool of the BSP. As such, Elia does not see a need to amend Art. II.11.5.
Incorrect reference	Fluvius	In dit artikel (II.8.9) wordt er verwezen naar Art II.3.20, dit artikel bestaat echter niet.	Elia thanks Fluvius for noticing the error in the T&C BSP FCR. The reference has been corrected to Art. II.3.17
Prequalification procedures	Febeliec	Febeliec, as already numerously voiced in the past, considers the stringent prequalification procedures of Elia a potentially unnecessary or at least too conservative approach and thus barrier to entry, especially for demand response and pools with demand response as	Elia considers this remark is strictly outside the scope of the current consultation of the T&C BSP FCR. Nevertheless, Elia welcomes the feedback provided by Febeliec. Elia would be open to analyze the possibilities towards an in-the-market prequalification. However, Elia would like to have clarity on

		tests will for most industrial processes automatically lead to production losses (in their respective sectors) and thus to costs which have to be covered somehow through the participation to the service and which thus create an extra cost level that does not necessarily exist for other technologies. Febeliec remains in principle in favor of a prequalification of the communication tools and protocols and qualification through participation to the delivery of products, where non-compliance will result in penalties.	the requirements following from the implementation of the network code demand response. For that reason, Elia has indicated to work on the prequalification procedures as part of the balancing roadmap as of 2026 (cfr. the work in the cluster to lower the barriers of both implicit and explicit flexibility).

5. Next steps

On the basis of the reactions received from market players and Elia's response, as set out in this consultation report, Elia has adapted its Proposal for Amendment to the T&C BSP FCR and submitted the proposal to the CREG.

6. Attachments

Contact

Elia Consultations
Consultations@elia.be

Elia System Operator SA/NV
Boulevard de l'Empereur 20 | Keizerslaan 20 | 1000 Brussels | Belgium

B.new.able

Reaction to the Public consultation on the Proposal for Amendment to the T&C BSP FCR

Bnewable would like to take the opportunity to react to the Proposal for Amendments to the T&C BSP FCR published by Elia in May 2025. We appreciate this opportunity as we believe industry consultations like this are a necessary part of obtaining well-functioning markets and policies. We appreciate the atmosphere Elia creates for honest, well-intended discussions.

Our reaction to this consultation is non-confidential, and we would appreciate its inclusion in the consultation report.

Bnewable appreciates efforts undertaken by Elia to harmonize reporting on FCR and aFRR, among others the switch to a common 4 second reporting granularity and the use of a declarative baseline. We are however against the introduction of yet another test with the new "Baseline test". Prequalifying for FCR is already today an endeavor requiring a significant number of steps/integrations/tests:

- Signing of the FCR contract
- Submission of an Energy Management Strategy per Delivery Point/Group (description + simulation)
- Obtaining the Connection Contract Check (DSO)
- Integration with ICCP/TASE2 for real-time communication (RTCP in the future)
- Conducting the communication test
- Conducting the prequalification test
- Integration with the ATP for the Availability Tests
- Integration with Regelleistung for FCR bidding
- Integration with BMAP for FCR Nominations
- Submission of a simulation for the Reserve Mode

These numerous steps result in an important entry barrier for new players, limiting the number of market parties in FCR and thus the efficient functioning of the market at Belgian level. Adding one more step in the prequalifcation process worsens the current entry barrier.

We would also like to react to the amendments regarding the Continuous Monitoring and in particular the Corridor Approach. Despite our best efforts we feel that the mathematical formulation are hard to understand and sometimes confusing.
For example, on page 101 the Lower Linear Limit (LLL) and Upper Linear Limit (ULL) are defined as functions of LL and UL, without defining LL and UL first. Regarding LLL and ULL, it is also not clear to us why the nested delays (first as τ and then as k, taking first a minimum and then a maximum) are needed.

We define:

- the Lower Linear Limit (LLL):

$$LLL(t;\tau) = \begin{cases} LL(t-\tau) + \frac{\tau-2}{13} * 0.5 * \left(\min_{0\le k\le\tau}\left[FCR_{Req}(t-k)\right] - LL(t-\tau)\right) & \text{if } 3 \le \tau < 15 \\ LL(t-\tau) + \frac{\tau}{15} * 0.5 * \left(\min_{0\le k\le\tau}\left[FCR_{Req}(t-k)\right] - LL(t-\tau)\right) & \text{if } 15 \le \tau \le 30 \end{cases}$$

$$LLL(t) = \max_{3\le\tau\le30}\left(LLL(t;\tau)\right)$$

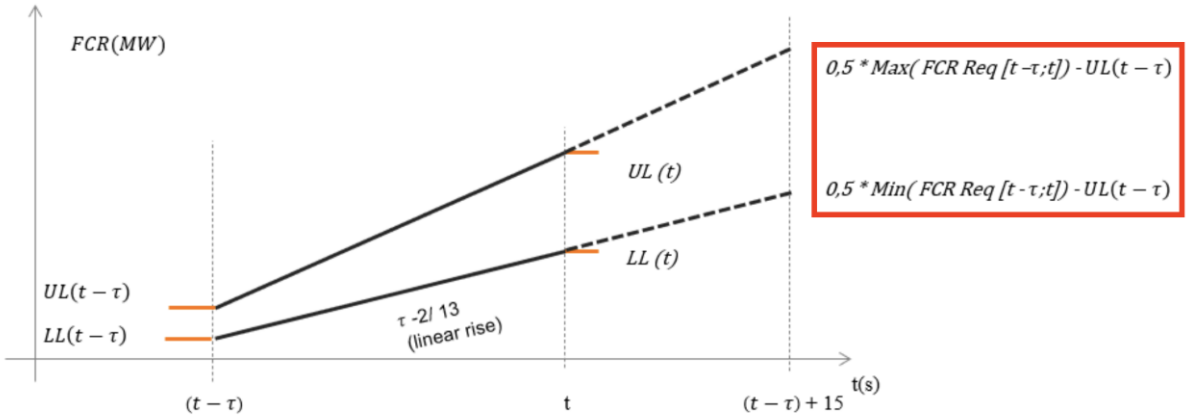
- the Upper Linear Limit (ULL):

$$ULL(t;\tau) = \begin{cases} UL(t-\tau) + \frac{\tau-2}{13} * 0.5 * \left(\max_{0\le k\le\tau}\left[FCR_{Req}(t-k)\right] - UL(t-\tau)\right) & \text{if } 3 \le \tau < 15 \\ UL(t-\tau) + \frac{\tau}{15} * 0.5 * \left(\max_{0\le k\le\tau}\left[FCR_{Req}(t-k)\right] - UL(t-\tau)\right) & \text{if } 15 \le \tau \le 30 \end{cases}$$

$$ULL(t) = \min_{3\le\tau\le30}\left(ULL(t;\tau)\right)$$

Also on p101, regarding the figures:

- We are not sure what is depicted, is it ULL and LLL?
- We are not sure over what index the Min and Max are applied.



Globally, the paragraphs 2.3.1.2 and 2.3.1.3 are quite obscure to us from the mathematical point of view even though we understand the general intention. We have also noticed differences in the formulas between the Explanatory Note and the Amended T&C, which make the understanding harder.

As a BSP we believe it is important that the concepts are clearly defined and understood by FCR suppliers and therefore kindly ask Elia to provide an updated documentation that would be easier to comprehend (with maybe more explanations between the mathematical formulas). We are happy to organize a call to explain in more detail what we are struggling to understand.

Regarding the migration of real-time data exchange to RTCP/Flexhub and the change in granularity, we would appreciate more information from Elia on when this change will take place and the potential parallel run period to better foresee this change in our roadmap.

A last remark is on the Amendments to the Prequalification test phase 1 where Elia proposes to remove the 5 seconds tolerance. This would mark a difference with normal FCR delivery where 2 seconds (or more in case of derogation) are tolerated for assets to start reacting to a frequency deviation (as long as the reaction delay is not artificial). If one takes the Figure “accepted response of FCR Provider to change in frequencies” shared by Elia in the Explanatory Note, the expected reaction at 25% after 7,5 seconds (without the 5 sec tolerance) is above the line separating the green and yellow areas. As such, the FCR prequalification requirements would exceed the FCR delivery requirements. We believe they should remain aligned as the purpose of FCR PQ is to check whether an asset matches the requirements for FCR delivery. Therefore, a reacting time tolerance should be kept in the PQ test.

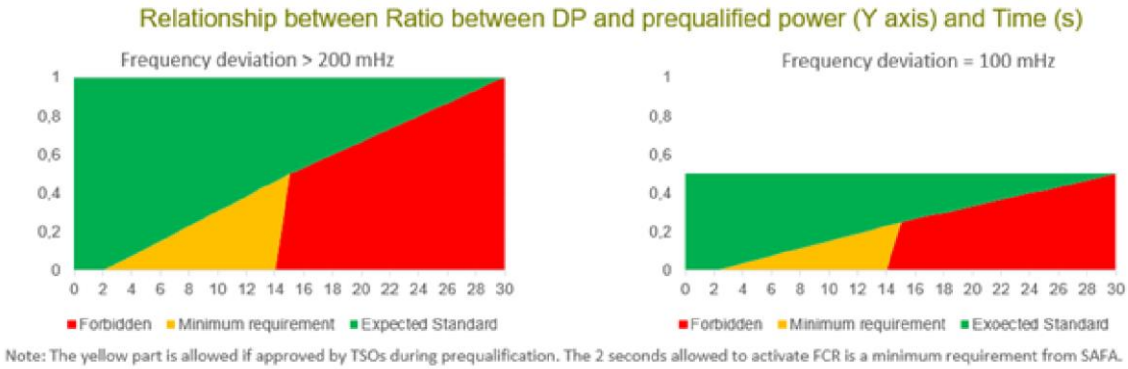


Figure 1:The accepted response of FCR Provider to change in frequencies

30 June 2025

Consultation on the amended T&C BSP FCR, aFRR, and mFRR

Dear Elia,

Centrica welcomes the opportunity to provide feedback on your consultations on the three amended Terms and Conditions for Balancing Service Providers (T&C BSP FCR, aFRR, and mFRR). Our overarching feedback is structured around the following areas:

- We support the self-billing process and request sufficient time and training for BSPs to onboard new processes and systems.
- We welcome the declarative FCR baseline and the adapted normalisation factor, and highlight the need to further align FCR and aFRR designs.
- We support continuous monitoring and activation control, and raise concerns on slower-reacting assets and outer frequency bands.
- We welcome the improvement of aFRR/mFRR and FCR/aFRR combos, insisting on the need for transparent error allocation.
- We support the reduced time window for prequalification tests in mFRR.
- We support the migration to RTCP/Flexhub and request clarification regarding low-voltage (LV) assets, the EMS, and the activation indicator DP_FCR.
- We urge Elia to preserve the possibility to aggregate flexibility from LV assets when switching to the LV Delivery Point Group concept.
- We request a detailed roadmap with concrete go-live dates and sufficient time for implementation.

We are aware of the complexity of these developments and trust that Elia will consider the industry's different points of view. We look forward to further discuss these matters with you and are happy to provide additional information.

Yours sincerely,

Patrick Adigbli
Regulatory Affairs Manager, European power markets
Centrica

We support the self-billing process and request sufficient time and training for BSPs to onboard new processes and systems

We support the introduction of the self-billing process outlined in the T&C BSP FCR, aFRR, and mFRR, as it promises to streamline operations and reduce payment timelines.

However, we emphasize the need for data accuracy, a robust dispute resolution process to avoid incorrect settlements, and sufficient time to onboard new processes and systems. The implementation workload for BSPs to be ready by Q4 2025 is significant and includes onboarding EPIC, training, implementation of approval and rejection processes, testing, and parallel runs.

We welcome the declarative FCR baseline and the adapted normalisation factor, and highlight the need to further align FCR and aFRR designs

We support the introduction of the declarative FCR baseline proposed in the T&C BSP FCR, which will facilitate the simultaneous delivery of FCR and aFRR, as well as continuous activation control.

We also support the adapted normalization factor for the baseline test as described in the T&C BSP FCR and aFRR, which facilitates the participation of assets with a reference baseline close to zero, such as batteries.

Finally, we emphasize the need for a common baseline test for both aFRR and FCR to ensure consistency. We also call for the introduction of a calculated real-time baseline in FCR to align with the aFRR design, where this option already considers the variability of certain assets.

We support continuous monitoring and activation control, and raise concerns on slower-reacting assets and outer frequency bands

We support the continuous monitoring and activation control proposed in the T&C BSP FCR, which increases transparency and reduces the risk of significant penalties due to random sampling.

However, we raise concerns about the potential complexity introduced by derogations for slower-reacting assets (‘Additional Properties’) and disparities between the monitoring of inner and outer frequency bands. We invite Elia to provide detailed guidelines and examples to better evaluate the impact of the new monitoring and activation control rules, covering various use cases.

centrica

We welcome the improvement of aFRR/mFRR and FCR/aFRR combos, insisting on the need for transparent error allocation

We welcome the extension of the aFRR/mFRR combo from DP_SU to DP_PG, which offers new optimisation opportunities and is expected to have a positive outcome on market liquidity.

We also welcome the improvements to the FCR/aFRR combo and understand that Elia proposes to allocate errors primarily to aFRR, revise the design of the tolerance bands, and use the Tetris algorithm for volume allocation.

However, we insist on the need for fair and transparent error allocation in case of FCR/aFRR combo activations and welcome concrete examples evidencing that contributions of each service are accurately reflected, that BSPs are not unfairly penalized compared to a separate delivery of the services, and that availability tests triggered for one service do not impact the other.

We support the reduced time window for prequalification tests in mFRR

We support the reduced 4-hour time window in the T&C BSP mFRR, which is expected to unlock flexibility in the capacity auction by removing the 24-hour availability requirement to perform prequalification tests.

We support the migration to RTCP/Flexhub and request clarification regarding low-voltage assets, the EMS, and the activation indicator DP_FCR

We support the migration to RTCP and Flexhub and the harmonization of data granularity in the T&C BSP FCR, which will lower costs and reduce entry barriers.

We invite Elia to clarify the expected impact of the new data granularity on low-voltage assets, which currently provide data with a specific granularity, as well as the expected impact of the DP_CH-DCH removal on the EMS.

Finally, we highlight the possible presence of more volatile assets in the portfolio which deliver FCR in case of extreme frequency deviations and should not lead to penalties during small frequency changes. We ask Elia to confirm the introduction of an activation indicator DP_FCR to identify which DPs to consider for activation control, similar to the aFRR design.

We urge Elia to preserve the possibility to aggregate flexibility from low-voltage assets when switching to the LV Delivery Point Group concept

We believe that Virtual Delivery Points are key to providing aggregated flexibility from LV assets. The switch to the LV Delivery Point Group concept suggested in the T&C BSP FCR must preserve this possibility.

We also question whether the removal of the 1.5 MW volume limit could impact the reliability of FCR delivery from BSPs relying on central frequency measures and control logic (e.g., in case of communication failure or frequency splits described in the Additional Properties and SOGL).

We request a detailed roadmap with concrete go-live dates and sufficient time for implementation

Elia's proposed changes are significant and require extensive implementation efforts. Technical, operational, and commercial readiness of market participants is essential for a successful go-live.

While acknowledging the need for change, we express concerns about the unclear timeline and phased approach. To enable effective planning and avoid any operational disruption, we emphasize the need for a detailed roadmap with concrete go-live dates and sufficient time for implementation. We also require the timely publication of technical documentation needed to estimate IT costs and to plan developments.

POSITION

Subject: FEBEG response to the Elia consultation on the proposal for amendment to the T&C BSP FCR
Date: 30 June 2025

Contact: Chris Celis
Telephone: +32 492 25 87 22
Mail: chris.celis@febeg.be

General feedback

FEBEG would like to thank Elia for conducting this public consultation. The answers are not confidential.

Specific feedback

Invoicing & settlement

All in all, FEBEG welcomes the initiative to improve invoicing and settlement. We consider that these are interesting evolutions although other topics (e.g. improve the design of penalties) have higher priorities for FEBEG.

While faster settlement is desirable in most of the cases, FEBEG wants to highlight that T&C's should not strictly impose inflexible deadlines and processes. There will always be specific cases which require ad-hoc (and sometimes more time-consuming) exchanges and FEBEG believes that it should remain possible to have bilateral discussions TSO- BSP in order to allow for a mutual understanding and to avoid undue payments. In this spirit, we do not support the following sentence which pleads for a very strict and inflexible guideline irrespective of the situation "If no agreement is found however, Elia will notify the CREG of the failed negotiation and will issue self-bills, self-bill credit notes and Elia invoices based on the initial report figures."

FEBEG proposes to include the following track change and asks:

"If no agreement is found however, Elia **may** notify the CREG of the failed negotiation and **may** issue self-bills, self-bill credit notes and Elia invoices based on the initial report figures. **Elia will notify the CREG automatically, only if it considers the negotiations are unreasonably taking too much time**"

As far as the payment terms, FEBEG supports the willingness to align T&C's BSP with T&C BRP. In a vast majority of the cases, the proposed term of 15 calendar days will not be an issue. However, FEBEG wants to pay specific attention to the specific cases which require

bilateral exchanges and thorough investigations. Each party should remain flexible to account for the specificity of a situation.

Lastly, FEBEG wishes to remind that faster settlement and shorter payment terms rely on tools being state of the art and no IT bugs. In reality, there is always something which can explain why it takes more time than expected. Here we think about the first days following a go-live, an IT release, the correct understanding of updated T&C's, new behaviors of dispatching, etc. This makes that a pragmatic approach and mindset is often required._

Amendments about the introduction of a mandatory declarative baseline

FEBEG understands the need to move to a declarative baseline which will bring more accuracy in general. We only fear that this will come with costly mandatory implementation and ask Elia to keep the requirements as light as possible and do not impose inflexible and tight deadlines to the market participants (see also remarks on implementation plan below). Also, FEBEG asks Elia to keep the door open for a grace period in case of communication issues.

Amendments about Monitoring, Activation Control & Incentives

FEBEG understands the need to monitor the accuracy of the service and considers it is a logical evolution. At this stage, it is complex to say whether the activation control and Incentives evolution are correctly designed, not leading to an unjustified increase of penalties (Elia referring to "Incentives"). In multiple consultations, WG and ad-hoc discussions, FEBEG members have consistently expressed their concerns about the penalty regime which can be inappropriate and create barriers to participate. While we cannot express the clear impacts those evolutions will have, we want to ask Elia to remain open for changes in the future would those evolutions bring undesired effects in general. Here, we mainly think about leaving the possibility to lower the penalty factor (currently proposed at 1.2).

Amendments of the prequalification tests

FEBEG takes note of the proposed evolution of the prequalification test. While we understand the need to take a prequalification test, we ask Elia to avoid complexity certainly in the transition phase from old to new test. Concretely, assets which aim to be prequalified in the coming months had to/ will have to make the necessary developments following the current requirements. They should not be asked to take the new prequalification test (and implement the associated requirements) if they succeeded the 'old' prequalification test. This remark is also to be included in the larger discussions about barriers to participate to explicit flexibility.

Implementation Plan

FEBEG understands some changes are required but calls the attention of Elia for a high need of planification and large enough lead time to implement those necessary changes (e.g. declarative baseline does not exist today in FCR). We would like to emphasize that IT resources are already allocated to other developments and new requirements cannot be

put with the highest priority at the expense of other projects. Hence, we do ask for a swift and pragmatic implementation plan where the co-existence of old and new requirements (more specifically for (i) the mandatory declarative baseline, (ii) the new prequalification test and (iii) ICCP/TASE2 to be replaced by RTCP/Flexhub) would be allowed during a 'transition phase'.

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EU Transparency Register 727718796354-69

Febeliec answer to the Elia public consultations on the Terms and Conditions BSP for FCR, aFRR and mFRR

Febeliec would like to thank Elia for this consultation on the T&Cs BSP for respectively FCR, aFRR and mFRR. Febeliec would like to provide following comments:

For the T&C BSP FCR

Regarding the baseline tests, Febeliec is not opposed in principle against such test insofar this does not introduce a barrier to entry in the prequalification tests. Febeliec, as already numerously voiced in the past, considers the stringent prequalification procedures of Elia a potentially unnecessary or at least too conservative approach and thus barrier to entry, especially for demand response and pools with demand response as tests will for most industrial processes automatically lead to production losses (in their respective sectors) and thus to costs which have to be covered somehow through the participation to the service and which thus create an extra cost level that does not necessarily exist for other technologies. Febeliec remains in principle in favor of a prequalification of the communication tools and protocols and qualification through participation to the delivery of products, where non-compliance will result in penalties.

For the T&C BSP aFRR

Febeliec wants to refer to its comment above regarding prequalification, as a similar reasoning applies to aFRR.

Regarding point 2.7 of the explanatory note, Febeliec reads "*Pursuant to article 18(7)b of the EBGL, each connecting TSO may include "a requirement for balancing service providers to offer the unused generation capacity or other balancing resources through balancing energy bids or integrated scheduling process bids in the balancing markets after day ahead market gate closure time". This was already* ***declined*** *in the T&C BSP aFRR Art. II.3.8"* Febeliec does not understand the meaning of "declined" in this context and wonders if this is an issue due to translation, as Febeliec is of the opinion that there are for good reason bidding obligations for certain assets.

For the T&C BSP mFRR

Febeliec strongly supports that – finally! – amendments are introduced which prepare for the participation of low voltage delivery points, even though Febeliec remains of the opinion that many more barriers should be tackled to truly allow a full participation of the flexibility of low voltage delivery points. Nevertheless, these amendments already clear one hurdle. Febeliec supports a simple and pragmatic approach for opening up participation of this flexibility to the market, but asks that a continued analysis is done to see whether certain assumptions, such as a.o. the assumption that all low voltage delivery points part of the LV DPG participate in the delivery of the mFRR Supplied cannot be modified towards the future if such need would become clear towards a better participation and more market functioning, such as competition between FSPs not only towards Elia but also regarding value propositions towards flexibility owners in low voltage. Febeliec however wants to stress that it supports this important modification to finally move towards participation of low voltage assets.

Febeliec supports amendment towards the combination of aFRR and mFRR using the same delivery point, but reiterates its request to also allow multiple FSPs per delivery point for the same or different (combo) products, as for some specific cases and as discussed in the past this could either unlock more flexibility or allow for better market functioning (or both).

Febeliec also supports the reduction of the time window during which prequalification test can be triggered. Febeliec also wants to refer to its general comment above regarding prequalification, as a similar reasoning applies to mFRR.

FCR	Art. II.1 Definities	“Pool: De volledige lijst van Leveringspunten die door de BSP in het BSP Contract FCR of in het FSP-DSO-Contract opgenomen zijn;” In het FSP-DSO-Contract vermelden we geen lijst van Leveringspunten, wel hoe de pool geraadpleegd kan worden.	Verwijzen naar de definitie in het FSP-DNB contract of deze overnemen: **Pool**: geheel van de Dienstverleningspunten voor flexibiliteit die de FSP mag activeren in het kader van de flexibiliteitsdiensten
FCR	Art. II.1 Definities	Virtueel Leveringspunt: de definitie hiervan is verwijderd, maar deze term wordt wel nog vaak in het document gebruikt.	Kan hier gebruik gemaakt worden van de terminologie in de Network Code Demand Response, bijvoorbeeld 'SPU' ‘service providing unit’ or ‘SPU’ means a single controllable unit or an ensemble of controllable units connected to a single connection point. SPU is defined by the service provider to provide balancing or local services;
FCR	II.3.14 tem II.3.17 Voorwaarden voor Leveringspunten aangesloten op een Publiek Distributienet	In deze artikels wordt er enkel vermeld hoe Laagspanningspunten aangemeld kunnen worden. Dient er ook niet vermeld te worden hoe MV punten moeten worden	
FCR	Art. II.8.9	In dit artikel wordt er verwezen naar Art II.3.20, dit artikel bestaat echter niet.	
FCR	Art. II.11.5	“Voor elk kwartier kan de BSP kiezen welke Leveringspunten, vermeld inAnnex 4of in het FSP-DSO-Contract, worden opgenomen in de FCR-Energiebieding” Leveringspunten zijn niet opgenomen in het FSP-DSO	
FCR	3.C Frequentiemetingen	“Voor een Leveringspunt op het Publieke Distributienet volstaat één frequentiemeter voor meerdere Leveringspiunten, indien de totale volume minder of gelijk aan 1.5MW is, en de Leveringspunten zich binnen dezelfde Elektrische Zone bevinden.. De BSP mag beslissen waar hij de frequentiemeter van het Virtuele Leveringspunt zal plaatsen.” - Van waar komt de 1.5 MW? - Waarom wordt er over volume gesproken? - Er is een link naar het Virtuele Leveringspunt, maar daar is geen definitie meer van. - Bedoeld men met de frequentiemeter de Gateway?	
FCR	4.D Liist van FCR Groepen van Laagspannings-leveringspunten	De lijst van mFRR groepen van LS leveringspunten zal steeds wijzigen. Het heeft dan ook weinig zin die in de T&C op te nemen.	Artikel 4.D schrappen

Van der Vorst Thomas

From: thijs delerue <noreply@jotform.com>
Sent: Monday, 30 June 2025 18:55
To: Van der Vorst Thomas
Subject: Re: 20250528_Public consultation on the Proposal for Amendment to the T&C BSP FCR - thijs delerue

A new answer to the consultation "20250528_Public consultation on the Proposal for Amendment to the T&C BSP FCR " has been submitted on our website.

- **Name:** thijs delerue
- **Email:** thijs@yuso.com
- **Organization:** Yuso BV
- **Comments/suggestions to the consultation:** - To further align the FCR baseline methodology with that of aFRR, we encourage Elia to also include, within the new FCR design, the explicit possibility for BSPs to request the use of a real-time baseline. The aFRR framework currently allows for such requests under specific justified circumstances.
  - Can a common baseline test be executed for FCR and AFRR with the same delivery point(s), in order to reduce the BSP prequalification procedure?
  - A well-defined transition timeline from ICCP/TASE2 to RTCP/Flexhub is essential to ensure that BSPs can adapt their systems, perform thorough testing, and avoid operational disruptions. We request Elia provide a detailed migration timeline with at least 3 months advance notice before mandatory transition to RTCP/Flexhub
- **Upload additional documents if needed:**
- **Answer confidential:** Completely non-confidential

Contact:
consultations@elia.be