

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.