**Febeliec answer to the Elia public consultation on the proposal for amendment of the balancing rules regarding the FRR activation strategy**

 Febeliec would like to thank Elia for the public consultation on the proposal for amendment of the balancing rules regarding the FRR activation strategy. Febeliec as always strives for the lowest possible system cost, which includes a.o. the balancing activation strategies which provide the lowest overall cost. As such, Febeliec is in favor of the proposed amendments of Elia, insofar the expectation of lower aFRR costs compared to mFRR materializes and of course system security is not jeopardized. Regarding the proposed KPIs, Febeliec would also like to include a what-if scenario, comparing the current active strategy with the proposed strategy, taking into consideration assumptions regarding the ceteris paribus situation, in order to have a benchmark (even if not perfect).

Febeliec also strongly asks that in case the proposed amendments to the FRR activation strategy would not lead to the expected results, it should be possible to revert these without undue delay. As in previous changes to the regulatory framework, such option should be foreseen from the beginning, as not only the assumptions to propose this amendment could have been erroneous, but also the context could change drastically (e.g. connection of France to the European platforms, leading to a different outcome as compared to the current situation). Febeliec insists that a rollback is already foreseen to limit the negative cost effects.