

From: Jasper Vermandere <noreply@jotform.com>
Sent: Wednesday, 25 June 2025 16:27
To: Consultations
Subject: Re: 20250605_Public consultation on the Proposal for Amendment to the Balancing Rules - Jasper Vermandere



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A new answer to the consultation "20250605_Public consultation on the Proposal for Amendment to the Balancing Rules" has been submitted on our website.

- **Name:** Jasper Vermandere
- **Email:** jasper@yuso.com
- **Organization:** YUSO
- **Comments/suggestions to the consultation:** YUSO appreciates Elia's efforts to optimize the use of balancing reserves for the Belgian grid. However, we note that the impact of changing the activation strategy on reactive balancing - a key part of Elia's balancing philosophy - has not been addressed. We understand (from the RTP design note) that Elia aims to balance explicit and implicit flexibility by introducing the BRP supply curve and cost optimum alongside the BSP merit order list.

****Impact on reactive balancing****

YUSO requests that Elia clarify whether they have researched how this change in activation strategy would affect BRPs' responses to the real-time price. We also ask whether there would be any overall positive impact from changing the activation strategy when considering both active and reactive balancing volumes.

As an example, we observed that on 2025-06-08, Elia Dispatch was activating small volumes of mFRR Down, which had a significant impact on the real-time imbalance price. While aFRR down prices remained modest (up to -10 EUR/MWh), the first mFRR down bid in the MARI merit order was below -150 EUR/MWh:

- If Elia were to activate only aFRR on such a day, it would likely lose the entire "reactive balancing merit order" because the real-time price would not trigger any reactive balancing response.
- If Elia continued to use mFRR, it would also activate all reactive balancing resources, as at prices below -150 EUR/MWh, most of the "reactive balancing merit order" would respond to the real-time price.

This example illustrates how a minor change in activation strategy (involving just modest mFRR

volumes) can significantly impact the overall balancing volumes when both active and reactive balancing resources are considered.

****Holistic approach needed****

From a broader perspective, YUSO believes Elia should ensure knowledge sharing between its teams and adopt a holistic approach to achieve the most effective balancing strategy.

For example, public consultations should be coordinated rather than conducted in isolation. When Elia proposes using imbalance price forecasts in its RTP design consultation, it must consider how its activation strategy affects the accuracy of these forecasts in this public consultation.

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

