

Response to Elia's Public Consultation on the proposal for amendments to the ToE Rules

Introduction

With this document, European Commodities wants to reply to Elia's Public Consultation on the proposal for amendments to the ToE Rules.

European Commodities (EC) acts as Balance Responsible Party (BRP) for multiple electricity suppliers across all regions in Belgium. In that capacity, EC is BRP_{source} for several electricity suppliers and therefore highly impacted by the application of Transfer of Energy and the proposed changes to the Transfer of Energy (ToE) Rules.

In general, EC welcomes the changes that are brought by Elia in the proposal and thanks Elia for the possibility to react to the proposed changes.

We especially welcome the inclusion of the Corrected Model for ToE, which we believe will greatly improve transparency and the availability of operational data in the energy market, while still providing strong (and even enhanced) protection to grid users. We urge the system operators to extend the Corrected Model to all grids and voltage levels.

We are however negatively impacted by the restricted availability of data on the ToE process and volumes related to the BRP_{source}.

As BRP_{source}, EC needs information on the volumes that are exchanged with its partner-suppliers to be able to :

- Forecast the volumes EC needs to procure on the Day-Ahead Market to limit imbalances regarding the injection and offtake volumes in the portfolios of the partner-suppliers
- Settle the exchanged volumes and imbalances with the partner-suppliers

We refer to the feedback that EC provided to the Synergrid Consultation on the ToE Design Note in February 2025, as this remains pertinent today.

We however want to detail this feedback further, because the currently proposed changes to the ToE Rules don't foresee in proper information provision to the BRP_{source} to execute our tasks with the desired precision.

Forecasting

The ability of the BRP_{source} to forecast the offtake of its suppliers' clients is improved in the Corrected Model, due to the availability of corrected metering data. The timely availability of that data is however quite important. Several improvements are therefore suggested:

- As BRP_{source}, EC receives the metering data via its partner-suppliers. It would facilitate operational processes and timelines if EC would directly receive this data from the system operators (from the CMS or the Flexhub)
 - o N.B. This comment also applies to the (non-corrected) metering data already exchanged today via the CMS and is not specific to ToE. With regards to ToE however, market processes would be improved by providing more information directly to the BRP_{source}.

- We note that in chapter 15 of the proposed ToE Rules, information provision to the suppliers is foreseen by the end of the 2nd month following the month during which the activation of flexibility occurred. This delay is too long to be practically useful for short term forecasting. As long as activated volumes in our BRP portfolio are low, the impact is expected to be low, but we ask the system operators to consider providing the corrected metering data (or at least the delta) as close as possible to the non-corrected metering data.

Settlement

To settle the exchanged volumes and imbalances with our partner-suppliers, EC needs a complete view on the suppliers' portfolios. If Elia applies perimeter corrections with respect to Transfer of Energy, EC therefore needs to know to which suppliers these corrections apply.

This information is not available to EC today, and the proposed changes to the ToE Rules don't improve that.

It is especially important to receive these volumes in case a supplier works with several BRP_{source} partners. In that case, the information currently exchanged with the market is not sufficient to properly work out and settle the positions between the BRP_{source} and the supplier, which can lead to adverse financial impacts.

We provide an example:

- Assume EC works with three suppliers (A, B and C) and two of them work (A and C) with multiple BRP_{source} partners. (Note that this is not an exotic example, but one that occurs in practice.)
- As BRP_{source}, EC sees a perimeter correction of -30 MWh, which is communicated to EC by Elia.
- The suppliers receive the following information on the ToE volumes (via the Flexhub):
 - o Supplier A: -5 MWh (potentially split over several FSP, but that is not relevant in the example)
 - o Supplier B: -20 MWh (same comment)
 - o Supplier C: -30 MWh (same comment)
- Since Supplier B only works with EC, it can communicate to EC that a perimeter correction of -20 MWh was done by Elia with respect to its client portfolio.
- But because Supplier A and C work with multiple BRP_{source}, and don't receive any information on the BRP_{source} a ToE volume relates to, they can't communicate to EC the volumes of the perimeter corrections that were done with respect to their client portfolio.
- EC can't work this out either, as it doesn't receive information per supplier, and is therefore not able to correctly settle and invoice Suppliers A and C.

This can be remedied by providing information to the BRP_{source} about the split of the perimeter correction per supplier.



In this respect, we refer to the public consultation from Synergrid about the changes to the Flexibility Documents with respect to Transfer of Energy¹. In the proposed changes to document C8/05, the following is foreseen:

- BRP_{source} will receive aggregated ToE volumes per supplier and FSP.
- Supplier will receive aggregated ToE volumes per BRP_{source} and FSP.

This is inconsistent with the changes Elia proposes and would solve the issue highlighted above. We therefore urge Elia to align its proposal to the proposal published by Synergrid.

In case there would be restrictions on the data the system operators can publish, we propose the following:

- As a minimum, suppliers should receive the aggregated ToE volume per BRP_{source} it works with, so it can communicate these to its BRP_{source} partners (in this respect, the split per FSP isn't relevant).
- However, as BRP_{source} we would prefer to receive such official data directly from the system operators, so we don't have to rely on the suppliers with respect to the timing and validation or the required operational data. As BRP_{source} we have no need for the volumes per FSP but do need to be able to identify the perimeter corrections with respect to ToE per supplier.

Conclusion

The Transfer of Energy mechanism was created to mitigate any impact of flexibility activations by independent FSPs. EC strongly urges the system operators to include the above proposal in the ToE Rules, as in our opinion the data exchanges as foreseen in the (current and proposed) ToE don't allow us to mitigate the impact of flexibility activations in all circumstances and market setups.

We therefore believe that with the change we propose above, the application of the ToE rules will become even more robust and thank Elia in advance to consider our proposal.

Sincerely,
Eric Olivier
European Commodities

¹ <https://www.synergrid.be/nl/documentencentrum/openbare-raadpleging/documenten-flexibiliteit-lente-2025>