

CONSULTATION REPORT

**Report on the transparent dialog
on *Elia's draft amendment of the
“grid connection study
methodology”***

31 October 2025



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1. Introduction

Elia organized an open dialog on 5th September 2025, followed by a call for feedback from 5th September 2025 to 1st October 2025 regarding a draft amendment of the Grid connection study methodology.

The purpose of this report is to consolidate the feedback received, while at the same time reflecting Elia’s position on these reactions.

2. Feedback received

In response to call for feedback, Elia received the following non-confidential replies from the following parties:

- BASF
- *Belgian Offshore Platform*
- *BSTOR*
- *CREG*
- *Essenscia*
- *FEBEG*
- *FEBELIEC*
- *Umicore*

In addition, *one* response was received that was designated as confidential.

All responses received haven 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 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 presents the overall reasoning behind the creation of a specific category for the HV/MV data centers
- Section 5 discusses the various comments received during call for feedback and Elia’s position on them,
- Section 6 contains the annexes of the consultation report.

This 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 the 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 comments on the document submitted for feedback. ○ In doing so, an attempt was made to list/consolidate all comments received and to argue whether they should be considered. ○ 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 uni-formed 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. Overall reasoning behind the creation of a category for HV/MV data centers

Short recap of the context

Elia is facing a significant increase in the number of connection requests for a total capacity that far exceeds what the network was originally planned for¹, as outlined in the development plans.

Among demand facilities, the overshoot of the expected growth is particularly pronounced for data centers. At the moment of the introduction of the modification to the Grid Connection Study methodology, the sum of all reserved and allocated capacities to data centers represented 12.7 TWh, almost 3 times as high as the expected growth for this category in the last approved long-term scenarios. Considering also the orientation studies for data centers, the total volume in the connection study pipeline amounts to about 70 TWh, being almost the equivalent of Belgium’s annual electricity consumption. In case these orientation studies would proceed to detailed study, thereby also reserving grid capacity, without any form of precaution, this would endanger the harmonious development of the electricity grid and severely clog the connection pipeline for demand facilities.

Short term measure and efficient queue management

The response (i.e. the creation of a specific category for the HV/MV data centers) is only a first necessary step. This first step will ensure that sufficient grid hosting capacity will remain for other demand facilities as well, in line with the societal ambitions which were accounted for in the grid development plans. Moreover, it will allow for a harmonious and balanced further development of data centers in Belgium, since the grid development plan (and consulted scenarios) will explicitly take into account the societal ambitions expressed for further growth of data centers.

¹ this significant increase is also referred to in the pre-check mechanism explained in the Working Group Belgian Grid of 5 September 2025.

This first step must be complemented by a series of measures (such as, amongst others, active queue management measures, moving away from a pure first-come-first-served approach) aimed at a more efficient allocation of the available connection capacity. Elia is working on this, in collaboration with the distribution system operators (DSOs), the regulators, and the authorities, and market players will also be involved in these essential reforms. These reforms will however take time as they require a perfect understanding of the challenges of the (candidate) grid users, a strong coordination between the different jurisdictions, an efficient collaboration between the different grid operators and a strong political commitment.

Based on the discussions held in the Task Force with all regulators (Task Force Connection & Congestion), Elia commits to presenting, in the Working Group Belgian Grid, a roadmap outlining the key steps of the reform of the current connection process, which is considered essential by all relevant stakeholders.

Overall reasoning

The energy efficiency first (EEF) principle (both at EU² and Belgian³ level) frames the way in which Elia must approach the development of the transmission grid. To respect such a principle, Elia must first gain a clear view of the projections, both in terms of load and in terms of production and storage. Within each of these big grid users categories, it is of utmost importance to consider the specificities of various usages (in particular in terms of profile and flexibility) to properly reflect their respective behaviours in the models, to manage their impact on the grid via energy-efficiency and flexibility oriented measures, before considering capital intensive grid reinforcements. That is the purpose of the scenarios of the Federal Development Plan that are subject to a broad public consultation and approval by the Federal Minister of Energy. Data centers, due to their nearly continuous usage, typically high usage, and limited flexibility potential, exhibit specific characteristics that, as such, justify the use of a dedicated category (next to many other ones) in the long-term scenarios.

Next to this EEF principle, another key principle defined both at EU⁴ and Belgian⁵ level is the one of a harmonious development of the electrical grid. This key principle means that the TSO is obliged to follow a balanced and sustainable grid build out strategy, in which several types of users, production, storage, and consumption are integrated in a harmonious way, also under economically acceptable conditions. Today, with the significant increase observed of the number of data center projects, going beyond all expectations and a fortiori those of the last consulted upon and approved long-term scenarios, this harmonious development of the infrastructure serving different societal ambitions is at risk. Indeed, the total volume of data centers in the connection studies is by itself exceeding the overall grid hosting capacity that the grid development plan did take into account for additional and extension of existing demand facilities. The harmonious development of the infrastructure also means that the tariffs the grid users pay to cover the cost of the development of the infrastructure must be in balance with the expectations they may have in terms of the grid capacity which is supposed to benefit to them as projected in the development plan.

Faced with such a situation, Elia is taking responsibility within its given mandate by updating the grid connection study methodology to introduce a new specific category for data centers, building on the one already foreseen in the long-term scenarios. This measure is based on an objective criterion, relevant to the intended goal and proportional to that goal.

² Art 3 Energy-efficiency directive 2023/1791

³ See a.o. art 8, 13, 23 Federal Electricity Act 29 April 1999, art 22, §1, 9° Code of Conduct, lastly updated by CREG on 10/04/2025 via decision (B)2899

⁴ Art. 40 and 51 of the EU Directive 2019/944.

⁵ Art 8, §1, 1° and art 13 Belgian Electricity Act 29 April 1999, art. 22, §1, 3° of the Code of Conduct, lastly updated by CREG on 10/04/2025 via decision (B)2899

- **Objective criterion:** Data centers are distinguishable from other consumption facilities by objectively identifiable characteristics, namely their consumption profile: typically very high, nearly continuous usage and limited flexibility, as well as their significantly higher growth compared to validated scenarios.
- **Relevant to the intended goal:** The goal is to achieve societal ambitions (e.g. enable electrification for heat, mobility, industry,... as planned for in the grid development plans) through harmonious grid development. Due to their technical nature and their significantly greater growth than anticipated, data centers put pressure on the available grid capacity compared with the actual development plan. This leads to a severe flexibilisation or even blockage of connections for other demand facilities that also contribute to societal ambitions. The distinction of data centers is therefore relevant.
- **Proportional to that goal:**
 - A strict first-come, first-served policy would, in practice, mean that data centers could claim nearly all available hosting capacity. Uniform rules therefore cannot offer a viable alternative. Further grid extension should be planned for in grid connection plans and, given the required volumes, has lead times of typically 10-15 years.
 - When a specific category, such as data centers, takes up or threatens to take up a disproportionate share of the available hosting capacity, it implies that other consumption facilities would indirectly have to contribute to grid development without having a real opportunity to strengthen their own connection. This would conflict with the societal nature of grid development, as emphasized by the Energy Efficiency Directive.
 - Moreover, the immediate introduction of a separate category for HV/MV data centers, at least at this stage, is the only measure that can effectively safeguard Elia’s responsibility⁶: the sustainable and harmonious development of the transmission grid.
 - Finally, the categorization does not prevent data centers or other facilities from connecting to the grid. It simply defines whether the connection benefits from reserved development margins or is considered additional. Requests above the given cap will not be denied access but will be offered a connection with *possibly* higher flexibility numbers. This ensures that grid capacity is used responsibly and in line with societal planning.

Reference is also to be made to Minister Bihet’s answer of 21 October 2025 before the Energy, Environment and Climate Commission of the Belgian Parliament (56 COM 217) acknowledging the monitoring by Elia of the growth potential of demand of the Belgian data centers.

To fully reflect this reasoning in the grid connection study methodology and to prevent any misinterpretation, we propose to directly add the following element related to the data centers to the text of the methodology:

- A data center is defined as a structure or a group of structures used to house, connect and operate computer systems/servers and associated equipment for data storage, processing and/or distribution, as well as related activities (according to EU regulation 2022/132), typically characterized by an almost constant power demand pattern and minimal possibility for curtailment or demand response.

⁶ Art. 40 and 51 of the EU Directive 2019/944. Art. 22 of the Code of Conduct, lastly updated by CREG on 10/04/2025 via decision (B)2899

5. Comments received during the call for feedback

The comments are structured in the following 3 blocks:

- Comments on the modifications introduced to the grid connection study methodology, which require a motivated answer in the present report.
- Comments on other aspects of the grid connection study methodology, which deserve an explanation in an upcoming Working Group Belgian Grid meeting, in the first half of 2026.
- Comments out of scope of the grid connection study methodology. These comments are relevant in the framework of the overall discussion but not related to the grid study methodology and thus not treated here.

Comments on the modifications introduced to the grid connection study methodology

ID	SUBJECT	STAKEHOLDER	FEEDBACK RECEIVED	ELIA'S VIEW
BASF1	Categories	BASF	Supports the proposition made by Elia to create a specific category for the data centers because it helps to safeguard hosting capacity (as foreseen and planned in the federal development plan) for the transition of the industry. This measure is justified and needed.	Elia acknowledges the feedback and takes note of its due consideration in the proposition of modification of the Grid Connection Study methodology.
BASF2	Queue management	BASF	This measure can only be a first temporary step, pending a sustainable and structural approach. This approach should include a correct sizing of the various categories, in line with the needs of the different market players. It should also include a more efficient management of the queue to favour mature projects. It should finally foresee mechanisms to free-up reserved or allocated capacities linked to a project that will finally not be realised (still considering specific industrial realities).	See answer provided to BOP7.
BASF3	Categories	BASF	Sprawl of categories should be prevented.	See answer provided to CREG6.

BOP1	Code of Conduct	BOP	The procedure followed is itself inadequate and in breach of due process for regulatory oversight and transparency.	The measure consisting in creating a specific grid user category for the data centers has been first introduced to the regulator end of 2024. As explained in his official reaction in the framework of the present call for feedback, the CREG, starting in December, shared Elia's concerns regarding a capacity allocation that was not aligned with the basic assumptions of the federal development plan and supported a consistent approach between the handling of connection requests and the long-term scenarios validated within the framework of the federal development plan. Regarding the modification process of the grid connection study methodology as such, the CREG considers in its reaction regarding the present modification proposal that it is in line with the prerequisites as laid out in the code of conduct.
BOP2	Categories	BOP	Differentiation in categories and determination of growth potentials must happen on a non-discriminatory way. Concerns that these changes will be implemented by Elia without fundamental engagement and control from regulators and involvement of various relevant policy levels.	See overall reasoning. The objective of the measure is precisely to treat the connection requests in accordance with the publicly consulted and approved by authorities societal ambitions. Introducing this measure precisely allows a better monitoring of a category of grid users which is experiencing a growth much beyond the expectations based on which the transmission network is planned. This allows control of the regulators and transparency towards the grid users and the public in general.

BOP3	Categories	BOP	Who will determine the objectives for the category data centers? This needs a clear strategic choice from the authorities.	The long-term scenarios reflect the societal ambitions and are therefore validated by the Minister. The long-term scenarios are the result of an extensive analysis and a wide public consultation. These scenarios are then used to dimension the transmission grid for the upcoming decades. These societal ambitions are guiding principles and certainly not to be considered as caps beyond which new grid users would be denied. These societal ambitions are the corner stones of a harmonious development of the transmission network. It is thus correct that the long-term scenarios carry a highly strategic dimension.
BOP4	Categories	BOP	It is not within the mandate of a grid operator to, without extensive coordination with the government, regulators, and market parties, introduce policy-sensitive criteria between categories of grid users. The procedure to change categories and criteria should be changed to systematically incorporate more support from society by letting market parties and policy have an active role and adding an overseer role for regulators.	See overall reasoning.
BOP5	Code of Conduct	BOP	Consultation process is too short.	The CREG considers that it is in line with the prerequisites of the code of conduct, while mentioning that the offered delay for the call for feedback is a minimum.
BOP6	Categories	BOP	A stable and predictable framework is crucial in building the energy system. Without this it could lead to uncertainty with investors, also for the sectors which are not directly affected by the measure.	The swimming lane approach is precisely there to offer stability and predictability to all sectors. The results of the detailed studies are not less binding via the introduction of this measure, on the contrary. Following this approach, a clear commitment is made towards the grid user while considering a societal ambition that would not have

				been fully translated in concrete projects yet. Doing so, certainty and stability is offered to the requestor while safeguarding the societal ambitions.
BOP7	Queue management	BOP	"Paper congestion" is indeed an issue that must be tackled. It is natural to differentiate projects based on their 'readiness'.	Elia supports the need to move beyond the FCFS model to a more structured access methodology. As such evolutions would require adaptations to the regulatory frameworks, they cannot be envisaged on the short term. However, Elia has recently launched a task force gathering the 4 Belgian regulators to elaborate such a reform in a coordinated way between the different regions and voltage levels. The (candidate) grid users will be involved in these discussions through the Belgian Grid Working Group.
BST1	Categories	BSTOR	Updates and reshuffling of potential and/or subdivision of potential in subcategories is not to be decided by Elia on its own. This should be the subject of the 4-yearly exercises to validate the network development plans.	See answer provided to FEBEG4
BST2	Code of Conduct	BSTOR	The methodology is used for implementing changes that in fact have nothing to do with the methodology itself, but with the connection process governed by the Code of Conduct and therefore is CREG competence.	See overall reasoning.
BST3	Categories	BSTOR	Consequences of creating this new potential dedicated to data centres are not clear.	There is no new potential created for the data centers. In general, identifying a growth potential for a given category is a way to safeguard the achievement of the societal ambition set for this category. When a growth potential is fully consumed (by reserved and allocated capacities), new requests coming on top will still be granted a connection

				proposal but there is then a risk that no reinforcement projects have been identified yet to allow its firm connection in the horizon of the last approved development plan, because the grid reinforcement projects are precisely identified in the development plans at the light of approved growth potentials for the various categories of grid users.
BST4	Others	BSTOR	The updates of the reference context lack transparency and is in breach with the principle of non-discrimination.	This topic is related to the TF Local Redistribution of Injections and Offtakes for which a public consultation is open from 03/10/2025 to 17/11/2025.
BST6	Others	BSTOR	Improve dispatch modelling from BESS	See answer provided to FEBEG6.
BST8	Code of Conduct	BSTOR	Deep disagreement over the urgency of the measure.	The timing is considered proportionate to the stakes, given the pipe of orientation studies which can quickly translate into detailed studies.
CREG01	Code of Conduct	CREG	Correct use of process to adjust methodology	Elia acknowledges the feedback and takes note of its due consideration in the proposition of modification of the Grid Connection Study methodology.
CREG02	Code of Conduct	CREG	Remark to give market parties more time in the future than the minimum time when proposing impactful changes	See overall reasoning. The timing is considered proportionate to the stakes, given the pipe of orientation studies which can quickly translate into detailed studies.
CREG03	Categories	CREG	Addition of MV/HV Data centers category increases transparency	Elia acknowledges the feedback and takes note of its due consideration in the proposition of

				modification of the Grid Connection Study methodology.
CREG04	Code of Conduct	CREG	Need to keep the methodology coherent and in line with the federal development plan and Adequacy & Flexibility-study	Elia acknowledges the feedback and takes note of its due consideration in the proposition of modification of the Grid Connection Study methodology.
CREG05	Categories	CREG	Differentiation in categories and determination of growth potentials must happen on a non-discriminatory way, with objective criteria and with adequate motivation considering pursued objectives	See overall reasoning. The Methodology, as complemented, allows to differentiate the relevant capacities, having regard to the objective criteria. The category of the MV/HV data centers has been determined based on such criteria, more specifically by reference to the subject of their activity and consumption profile.
CREG06	Categories	CREG	A sprawl of categories should be prevented.	Elia fully supports this statement. A sprawl of categories would lead to a scattering effect of the available hosting capacities, which could hinder the electrification of society. The creation of a new category must remain proportionate to the challenges at stake.

CREG07	Categories	CREG	Add additional information on growth potential and pre-check approach in methodology document	The growth potential directly depends on the last approved long-term scenarios and the capacities reserved and allocated via the connection process. Therefore, Elia provides a monthly update of the remaining growth potential (if any) on the Hosting Capacity Map web page. (https://www.elia.be/en/customers/connection/grid-hosting-capacity). On top of that, in the framework of the Task Force “Local Redistribution of the Injections and Offtakes (LRIO)”, the key concepts related to the grid connection study (i.e. reference context, growth potential, pre-reservation...) have been explained and subject to a public consultation. The identification process of local growth potentials will be detailed further in the iteration 2026 of the Task Force LRIO and will be subject to a public consultation. Like the categorization, the pre-check approach does not prevent data centers from connecting to the grid. It simply defines whether the connection benefits from reserved development margins or is considered additional. The pre-check approach is an implementation of the creation of a distinct category for the data centers, pending a corresponding characterization of the growth potential(s) for the demand facilities by competent authorities.
CREG08	Others	CREG	Does not agree with changes made on page 12 regarding cost for requestor for a connection, since it does not comply with art 22, bis1. Elia needs to clarify its approach and launch a dialog on this, ahead of any modification of the methodology to that regard.	On CREG's request, the text of the methodology is adapted to avoid any conflict with the code of conduct. Further evolution of the methodology could, if needed, further detail the considered variants.

CREG09	Categories	CREG	The identification of user categories and associated growth potentials must be conducted transparently with respect to the stakeholders involved, so that their perspectives can be considered.	The development of the long-term scenarios is subject to a wide and formal public consultation during which all opinions are gathered and treated, ahead of the formal approval by the minister.
CREG10	Others	CREG	Unclear if the changes made on page 13 on " Among these rare situations, ... case of N-1-1 ... " are a change of methodology or a clarification increasing transparency. This change does not follow from the code of conduct and is motivated by Elia. If it is a change, it should be managed in a different track according (B)2899, paragraph 91, 100, 101 and 170	This change is purely about a clarification and does not affect the methodology as such. Therefore, Elia proposes to put it in a footnote instead. This clarification does not introduce any inconsistency with the code of conduct.
CREG11	Others	CREG	Reference to a document on page 13 should be added to the methodology document according to art 61quater,1	Elia follows CREG’s suggestion and directly adds the document “technical report for connection studies proposing flexible access: content description and justification” in appendix of the grid connection study methodology.
CREG12	Code of Conduct	CREG	The remaining track changes are considered as redactional adjustments which are necessary for the methodology to remain conform with the code of conduct. These track changes are thus not subject to which the provisions in art 22, 1bis of the Code of Conduct do not apply.	Elia acknowledges the feedback and takes note of its due consideration in the proposition of modification of the Grid Connection Study methodology.
CREG13	Others	CREG	Conform art 61quater, 1 the confidential version of the technical report with a proposition of flexible connection must be sent to DG Energy instead of the non-confidential version mentioned in the methodology	Elia adapts the methodology accordingly (see section 1.3).
CREG14	Categories	CREG	Re-evaluation of the methodology to be foreseen after the approval of the next FDP or AF scenarios.	A re-evaluation of the (macro) growth potentials for the respective categories is indeed foreseen after the approval of the next long-term scenarios as these scenarios are considered as the new reference of societal ambitions.

ESS01	Categories	Essenscia	Short-term fixes are justified.	Elia acknowledges the feedback and takes note of its due consideration in the proposition of modification of the Grid Connection Study methodology.
ESS02	Queue management	Essenscia	A more structural reform is needed, including prioritisation of projects based on location and maturity, protection of strategic sectors, consideration of GHG emission benefits on existing industrial sites, batch processing or connection windows...	See answer provided to BOP7.
ESS03	Categories	Essenscia	Avoid over-fragmentation through excessive categorization based on scenario-based "swimming lanes".	See answer provided to CREG6.
ESS05	Queue management	Essenscia	Reject purely market-based allocation, ensuring grid access is not determined by financial strength.	This will be considered in the reflections regarding the grid connection reform.
ESS06	Queue management	Essenscia	A use-it-or-lose-it mechanism should focus on discouraging speculative request while still accommodating the complexity and long lead times of industrial projects.	A use-it-or-lose-it mechanism will shortly be introduced in a next version of the Code of Conduct. Elia takes note of the need for due consideration of industrial realities in this.
ESS11	Others	Essenscia	Speed up the treatment of connection requests	Elia's grid connection study capacity has already strongly evolved from ~40/y in 2022 to more than 150/y today, with studies also increasing in complexity. To further increase the study capacity and speed up the process, Elia has foreseen an extensive action plan with structural measures on top of the already foreseen increase in resources. This action plan is structured around the following four levers: 1. Decouple workload increase from amount of connection requests 2. Stabilization of the regulatory context 3. Simplification of orientation studies 4. Digital transformation

FEBEG1	Code of Conduct	FEBEG	Methodology for grid connection studies is not stable enough, which creates a lot of uncertainty for projects. The process to modify the methodology should be more robust, with proper consultation and approval by CREG.	See answer provided to BOP1.
FEBEG2	Categories	FEBEG	Is there a sufficient legal basis for such a different treatment? (further differentiation between categories and specific treatments)	See overall reasoning. The creation of a specific category is based on an objective criterion, relevant to the intended goal and proportional to that goal, in order to avoid discrimination.
FEBEG3	Categories	FEBEG	Non-discriminatory treatment of users and generators and storage facilities in connection and access to the transmission system is a key principle anchored in the European Directive 2019/944 art. 46.2.(c) and art. 42.1.	See overall reasoning and answer in respect of FEBEG2
FEBEG4	Categories	FEBEG	Prioritizing or deprioritizing categories of grid users or technologies is not up to Elia	The approach consists in safeguarding the achievement of societal ambitions which have been developed via the Task Force (Multi-Energy) scenarios based on a call for evidence, various workshops with the relevant stakeholders and a public consultation and finally approved by the Minister. These scenarios have then been directly used to define the grid reinforcements to be envisaged for the next 10 years, via the Federal Development plan. It is indeed not up to Elia to set these societal ambitions, but it is up to Elia to ensure a harmonious development of the transmission network to realize these ambitions.
FEBEG5	Queue management	FEBEG	Elia should develop a global view on the long term and on the short term, considering the developments in the Code of Conduct.	See overall reasoning. A roadmap will be presented to the WG Belgian Grid in the first half of 2026.
FEBEL1	Code of Conduct	Febeliec	Do not find the current approach with a methodology for grid connection studies applicable to, proposed by and approved	See CREG1.

			by Elia compliant with a correct balance and (regulatory) oversight.	
FEBEL3	Code of Conduct	Febeliec	Febeliec does not consider such decisions to be within the competence of a grid operator.	It is a matter of fact that many required measures will rely on adaptation to the regulatory framework(s) and decisions taken by competent authorities. However, given the urgency, Elia is taking responsibility within its given mandate.
FEBEL4	Categories	Febeliec	A differentiated approach for grid connection is needed between load, generation and storage, with a special attention to mixed sites to capture synergies.	See answer provided to ESS4.
FEBEL8	Queue management	Febeliec	Capacity hoarding should be prevented. FCFS might not be the best approach and a transition to a transparent, non-discriminatory framework that prioritises connection requests based on clear and objective criteria should be promoted.	See answer provided to BOP7.
UMI1	Categories	Umicore	A clear distinction should be made between load, generation, and storage. For mixed sites synergies should be maximized and any negative or perverse incentives avoided.	See answer provided to ESS4.
UMI3	Queue management	Umicore	The current FCFS principle risks blocking capacity through speculative or immature projects. Transition to a transparent and objective framework with clear milestones and criteria is essential.	See answer provided to BOP7 & FEBEG5.
UMI4	Categories	Umicore	Differentiation between DC and industrial demand is needed. It is important to limit capacity allocation to data centers to safeguard the availability of grid capacity for industry.	The measure consisting in creating a specific grid user category for the data centers aims at safeguarding the growth potentials validated for the other grid user categories. The goal is not to limit capacity granted to data centers but to do so while considering the remaining growth potential of the other uses. Limitation of capacity allocation to data centers goes beyond Elia's mandate.

Comments on other aspects of the grid connection study methodology

ID	SUBJECT	STAKEHOLDER	FEEDBACK RECEIVED	ELIA’S VIEW
BST5	Others	BSTOR	Increase transparency on "input and boundary conditions". Need for a thorough deep dive into these boundary conditions.	Is out of scope of the current call for feedback but will be tackled in a next WG Belgian Grid (first half of 2026).
BST7	Others	BSTOR	Include redispatching opportunities in the methodology	Is out of scope of the current call for feedback but will be tackled in a next WG Belgian Grid (first half of 2026).
ESS04	Others	Essencia	Ensure mixed-use sites are fairly treated.	Is out of scope of the current call for feedback but will be tackled in a next WG Belgian Grid (first half of 2026).
FEBEG6	Others	FEBEG	The current methodology of Elia is very conservative as it does not use market based, realistic profiles for certain technologies (like the batteries). Elia needs to urgently adapt and improve the current Pmax/Pmin approach for BESS.	Is out of scope of the current call for feedback but will be tackled in a next WG Belgian Grid (first half of 2026).

Comments out of scope of the grid connection study methodology

ID	SUBJECT	STAKEHOLDER	FEEDBACK RECEIVED	ELIA'S VIEW
BOP8	Others	BOP	Giving flexible connections or no connections at all is no structural solution. Focus should be more proactivity to estimate (real) requests and some crucial expansion projects. Else this could lead to hinder the energy transition itself.	n/a
ESS07	Others	Essenscia	Flexible connection agreements can help optimise grid usage but must remain voluntary and transparent, should not become the rule, and/or used to delay necessary grid reinforcements.	n/a
ESS08	Others	Essenscia	All grid users, including large-scale batteries, must contribute fairly to grid costs. This can also help addressing grid congestion by discouraging inefficient project siting.	n/a
ESS09	Others	Essenscia	Maximize existing capacity first, through smarter operation and asset management.	n/a
ESS10	Others	Essenscia	Accelerate strategic network expansion	n/a
ESS12	Others	Essenscia	Enable anticipatory investments with clear criteria	n/a
FEBEL2	Others	Febeliec	Elia should investigate its own processes and procedures to guarantee sufficient grid connection capacity.	n/a
FEBEL5	Others	Febeliec	Voluntary firm vs non-firm connections, combined with differentiated tariffs based on the value they bring, could ensure a more efficient and societally beneficial use of grid capacity	n/a
FEBEL6	Others	Febeliec	Elia should develop a comprehensive framework for storage integration that explicitly reflects system needs and provides transparent, predictable incentives for investors (including locational grid tariffs). It is possible to design a framework that	n/a

makes batteries not only grid-friendly but even grid-positive, unlocking additional grid hosting capacity.

FEBEL7	Others	Febeliec	A possibility to apply for permanent non-firm connections at a significantly reduced grid tariff should be introduced.	n/a
UMI2	Others	Umicore	Voluntary firm vs non-firm connections, combined with differentiated tariffs based on the value they bring, could ensure a more efficient and societally beneficial use of grid capacity	n/a

6. Next steps

Where relevant, the Grid Connection Study methodology has been adapted, based on the feedback received on the proposed modifications and tackled in the present document. The updated version of the Grid Connection Study methodology is attached to the present report and enters into force at the moment of its publication.

As mentioned in the present report, a roadmap for the reform of the first-come-first-served approach will be presented in a next Working Group Belgian Grid, following discussions on this topic in the Task Force gathering the four regulators (Task Force Connection & Congestions).

The feedback provided on other elements of the Grid Connection Study methodology than the modifications communicated on the 5th of September 2025 has not been treated in the present report but will be covered in a next Working Group Belgian Grid, in the first half of 2026.

Elia will reassess the methodology at the light of the next edition(s) of the Code of Conduct and adapt where required. Elia also commits to monitor the effect of the introduction of the new category for the data centers on the harmonious development of the network and will communicate the results of this monitoring to the Working Group Belgian Grid on a biennial basis. Finally, it is also good to mention that the growth potentials will systematically be updated in the framework of the upcoming federal development plans, thereby ensuring a treatment of the grid connections continuously in line with most recent societal ambitions.

7. Attachments

The revised version of the Grid Connection Study methodology, with and without track changes.

The non-confidential reactions Elia received to the document submitted for feedback:

- BASF
- *Belgian Offshore Platform*
- *BSTOR*
- *CREG*
- *Essenscia*
- *FEBEG*
- *FEBELIEC*
- *Umicore*

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