



# Minutes of Meeting of WG Energy Solutions on April 4<sup>th</sup>

Meeting

Date	04/04/2025		
Organiser	Alexandre Torreele		
Dortioinanto		Attended	Fycused

Participants		Attended	Excused
Aspiravi	Opsomer Jeroen	$\boxtimes$	
BASF	Weynjes Jasper	$\boxtimes$	
BOP Belgian Offshore Platform	Canière Hugo	$\boxtimes$	
BStor	Fieuws Arthur	$\boxtimes$	
Centrica	Adigbli Patrick	$\boxtimes$	
Centrica	Gillis Jeroen	$\overline{\boxtimes}$	
Centrica Business Solutions	Peeters Stef	$\overline{\boxtimes}$	
COGEN Vlaanderen	Vandersyppe Hans	$\boxtimes$	
CREG	Cartuyvels Jacques	$\overline{\boxtimes}$	
CREG	Wilmart Gilles	$\boxtimes$	
Danske Commodities	Agernem Anders		
Dexter Energy	Pieck Maarten		
Eneco	Williame Jean-Francois	$\overline{\boxtimes}$	
Eneris	Tiben Niels	$\overline{\boxtimes}$	
ENGIE	Donnay de Casteau Loïc	$\boxtimes$	
Entras	Baetens Jens	$\boxtimes$	
FEBEG	Celis Chris	$\boxtimes$	
FEBELIEC	Van Bossuyt Michaël	$\boxtimes$	
Flexide	Gresse Pierre-Henri	$\boxtimes$	
Infrabel	Fontaine Valentin	$\boxtimes$	
Nemolink Ltd	Marsboom Pieter-Jan	$\overline{\boxtimes}$	
Next Kraftwerke	della Faille Harold	$\overline{\boxtimes}$	
Northpool	de Munck Casper	$\boxtimes$	
Northpool	Menezes Ines	$\boxtimes$	
Opteco	Meijsen Eva	$\boxtimes$	
Scholt Energy	Demeyer Valentijn	$\boxtimes$	
Smappee	Coudenys Andreas		
Soprasteria	Heylen Hilde	$\overline{\boxtimes}$	Ī
Synergrid	Adam Louise	$\overline{\boxtimes}$	Ī
Synergrid	Milis Kevin	$\overline{\boxtimes}$	
Tessenderlo	Taverniers Hans	$\overline{\boxtimes}$	
Veolia	Singh Narender	$\overline{\boxtimes}$	
Virya Energy	Macau Aurore	$\overline{\boxtimes}$	
VREG	Mertens Tim	$\overline{\boxtimes}$	





Yuso	Debaere Elias	$\boxtimes$	
Yuso	Delerue Thijs	$\boxtimes$	
Yuso	Pycke Bart	$\boxtimes$	
Yuso	Rosseau Jan	$\boxtimes$	
Yuso	Vermandere Jasper	$\boxtimes$	

Participants		Attended	Excused
Elia	Aulanier Elise	$\boxtimes$	
Elia	Bosschaerts Caroline	$\boxtimes$	
Elia	Claeys Sander	$\boxtimes$	
Elia	Debray Arnaud	$\boxtimes$	
Elia	Guérard Suzanne		
Elia	Jadoul François	$\boxtimes$	
Elia	Koelman Nicolas	$\boxtimes$	
Elia	Mettens Sybille	$\boxtimes$	
Elia	Pellegrin Cécile	$\boxtimes$	
Elia	Poncelet Kris	$\boxtimes$	
Elia	Serrarens Simon	$\boxtimes$	
Elia	Torreele Alexandre	$\boxtimes$	
Elia	Van der Vorst Thomas	$\boxtimes$	
Elia	Verbrugge Alexandra	$\boxtimes$	
Elia	Verelst Martine	$\square$	

Report

Author	Thomas Van der Vorst	
Function	WG Balancing secretary	
Date report	04/04/2025	
Status	☐ Draft	

## 1. Agenda

- 1. Introduction
- 2. Towards Roadmap 25-28
- 3. Finetuning of System Balance Philosophy
- 4. Real-Time Price design note II
- 5. Febeliec Barriers of entry to Elia's explicit balancing products
  6. EU & BE Balancing Program Update
  7. Balancing Products Retrospective 2024

- 8. BSP Faster Settlement incentive
- 9. T&C BRP Sequence of Go-Lives
- 10. Evolution of the Working Group
- 11. AOB





## 2. Report

#### 1. Introduction

No feedback received; MoM of last meeting WG Energy Solutions 06/02/2024 are approved.

## 2. Towards Roadmap 25-28

- Luminus ask if this roadmap is approved by CREG. Elia precises that discussions with CREG
  happened in in Q1, and they will be extended including market parties until June, also in
  collaboration with the DSOs and the regional regulators to create an alignment. Luminus fully
  support the initiative.
- Febeliec comments that because of the new standard products at European level that are more stringent, a certain amount of MW in flexibility has been lost in the Belgian market. Because mFRR Flex does not exist anymore, direct participation from the industry is down from tens of MW. Febeliec therefore wants to express that accessing European platforms also came with a cost to the Belgian market.
- Yuso agrees that not all flexible assets can accommodate to the standard products, but not agree
  that flexibility was lost, rather that it participates implicitly, by reacting to the price signals. Therefore,
  the question is not whether flexibility was lost, but is this flexibility brought to the market in another
  way.
- Febeliec comments that the European legislation allows for national products, that are used by many other Member States. Febeliec insists that having 5' Full Activation Time for aFRR and removing mFRR Flex product was a decision from Elia, not imposed by European legislation, and against the comments of some Market Parties. Febeliec adds there has been work done to lower entry barriers, but still work to do and Febeliec will present later some propositions. ELIA comments that such constructive exchanges are welcomed.
- COGEN Vlaanderen agrees with Yuso and highlights that energy contracts or supply contracts are
  currently getting more open to hourly prices, even balancing prices, which increases the
  development of solutions for implicit flexibility. Therefore, more and more people switch from explicit
  flexibility to implicit flexibility, and vice-versa. COGEN Vlaanderen believes that we should also see
  an effect on the dimensioning of the balancing needs, because more flexibility will be provided by
  implicit flexibility.
- Eneco asks whether the cost of explicit balancing in Belgium are higher than in other countries. Elia replies that after connection we've seen a reduction of the explicit balancing cost but does not have a benchmark with other countries costs. Febeliec adds that in their view the relevant question is rather what the prices would be today if Elia kept the mFRR flex product, which could be evaluated with a parallel run model. Elia replies that part of this flexibility moves from explicit to implicit flexibility, and making a parallel run would cost a lot, for an unreliable result. Eneco comments that the implicit market in Belgium is very attractive, compared to the explicit market, as it is remunerated at the marginal price, both in aFRR and mFRR, there are no penalties, etc. Elia concludes that it is the reason why the balancing philosophy will need to be discussed with regulators and Market Parties.
- Febeliec comments that there is not enough participation from the market parties in the Working Group.
- Febeliec has strong interest in Elia providing up-to-date products design notes. Today, for instance, it is difficult to find the reliable source of information to calculate penalties. Elia agrees.





#### 3. Finetuning of the System Balance Philosophy

- Luminus comments that, FEBEG never supported the previous balancing philosophy rather just
  had to accept it. Elia replies that they are aware of it, and believe it is more comfortable if the
  document is shared transparently and aligned with regulators and MPs. This is the reason why Elia
  shares a first status today and collect the feedback from Market Parties.
- Febeliec remarks that NCDR will have an impact on balancing, prequalification, etc... There will be changes in in SOGL, and EBGL because of NCDR. Elia thinks it reinforce the importance of this exercise, to have this reflexion in depth beforehand, in a transparent way and we should have one voice at Belgian level.
- Febeliec is negatively surprised that forecast errors still occur, and it is not getting better. In addition, forecast errors remain for a long time in the system. Febeliec adds that congestion management actions moving closer to real-time is a decision from Elia, who could alternatively find a methodology to take actions earlier, when there are more possibilities, and the market can be involved. Febeliec asks why Elia wants to take actions in real-time rather than upfront. Elia replies that the reason is to keep the volumes in control. Moreover, the design is not yet finalized, and Elia has to ensure the coherence between balancing and congestion management, which is also considering taking actions close to Real-Time. Febeliec clarifies they prefer earlier actions, as lots of industrial consumers, and even generation, have a lead time preventing them to act in Real-Time. Elia adds that congestion and balancing need to be aligned. ELIA will have to do choices, in the best interest of society. Febeliec also has discussions with regional regulators, and they don't necessarily see RT actions as to go-to solution, but they see it is a barrier.
- ENGIE adds it should be avoided to be organized in silos, especially with congestion management
  and balancing. The reorganisation of the working groups between WG Grid and WG energy
  solutions makes it difficult to raise valuable points and ENGIE advocates for a more transversal
  approach.
- ENGIE asks whether Elia will privilege explicit balancing over implicit. Consequently, Elia might
  need to change the pricing (imbalance price) because in some cases it is more favourable to
  participate implicitly. Elia is currently considering changing the formula, with the alpha component,
  the way aFRR and mFRR components are mixed, but also the activation strategy, on which there
  is an incentive in 2025.
- Febeliec comments that they communicated in the past about barriers, and the commission will
  now impose some of them through NCDR, be it on Prequalification and switching between Pools,
  on Value-Stacking, application of Dedicated Metering Devices. All these shall have to be
  implemented and harmonized at European level 3 years after entry into force of the NCDR.
  Febeliec suggests that Elia starts looking into those now, because there might be some quick wins.
- Luminus asks how ELIA sees the interaction with congestion management. Elia intends to use the next two months to collect the feedback of Market parties on this topic.

## 4. Real-Time price – design note II

- According to Febeliec, one of the biggest issues are discontinuities of the ISP, and it is important
  to highlight it somehow, so that everyone knows the impact it may have, on assets ramping up or
  down e.g. Elia thanks the stakeholder for the comment.
- Febeliec remarks there is no objective linked to congestion and asks Elia if they do not consider that Real-Time Price could also help to lower congestions. ELIA replies they do not mean that congestion is not a topic, but they do not see the formula itself being concerned, hence it is not mentioned in the objectives of the formula. The discussion between balancing and congestion are





not yet in place for this topic. Febeliec precises that there can be implicit reaction, that can cause congestion and suggests that an efficient way to deal with it could be taking a locational aspect in the imbalance price. Elia confirms that it is a topic of interest, as implicit reaction could cause congestion. While it is not considered today, it could be an evolution in the years to come.

- Eneco remarks that the analysis was made on data from 2023 and asks whether it was updated
  with more recent data, especially since the connection to PICASSO. Elia replies that a preliminary
  analysis has been made since the connection to PICASSO, but a full reporting since has not yet
  been done, because on the one hand, not enough data are available since the connection (the data
  does not cover a full year), and on the other hand the connection to MARI is coming, which will also
  have an impact.
- Eneco asks whether the same conclusions can be drawn from that preliminary analysis since the connection to PiCASSO. Elia replies that, as the formula has evolved, and they have not access to the same Merit Order List, it is not obvious to compare the results.
- YUSO asks if Elia will ensure a level-playing field for assets that can participate in both explicit and implicit flex. If aFRR is has more value than implicit flex for Elia, it should simply be procured from these assets through the aFRR auction at a cost at which these assets will choose to deliver explicit flex. Elia replies that the imbalance price formula could be reviewed in order to avoid giving an incentive on a structural basis to flexible assets to foster implicit reaction over explicit participation. Lowering the barriers, making the imbalance formula evolve, making our activation strategy evolve, can contribute to not encourage assets to perform implicit reaction when they are able to participate explicitly. Febeliec adds that, when there is ATC available, the cross-border market is also an incentive to participate explicitly.
- Febeliec comments that it should not lead to more reservation of aFRR capacity. Elia replies that
  the reflexion on the reservation of the means is part of the system balance philosophy topic.
  Febeliec adds that the Merit Order List structure must be taken into account in the reflexion. For
  example, in Germany the system is mostly balanced with aFRR, but they have a 2 GW MOL, which
  is not the case in Belgium.
- ENGIE comments that the balancing strategy can also lead to an incorrect Real-time value of the energy. ENGIE believes there is a lot to be gained from a wise balancing strategy. Elia replies this is part of the reflexion for the incentive 2025 on the activation strategy.
- ENGIE asks how Elia will process the feedback. Elia precises they are collecting feedback on other matters than European platform integration. This could be integrated to merge in the next version of the formula. ENGIE comments that, if they need to judge something, they must compare it to an alternative, which is the existing imbalance price. ELIA clarifies that there are some parameters components analysed in the evaluation plan, while the presented design note concerns things that are not in the evaluation plan. There are elements for which one year of data after the connection to PICASSO are not needed to start working. ENGIE calls to be careful on the conclusions drawn, as the full package is needed.

### 5. Febeliec - Barriers of entry to Elia's explicit balancing products

• Elia asks what the added value is from a specific mFRR product, compared to implicit flex, knowing that a specific product is national, hence cannot be activated cross-border. Febeliec replies that it should be possible for actors willing to offer explicit flexibility to do it, and mFRR Flex allows more actors to participate than standard mFRR products. Moreover, the reservation costs could be lower with mFRR Flex. Elia adds that if those assets participate implicitly, it is needed to activate less mFRR. Febeliec believes that the methodology used by Elia does not take into account everything





that happens in the market. FEBEG is not completely against such products but highlights the importance to keep technology-neutrality and not be too specific in the product.

- FEBEG is not convinced by multiple BSP per DP, because it adds a lot of complexity. Moreover, the costs consequent to this complexity must be taken into account. Febeliec replies that in the future, there may be one physical delivery point, where you might want to offer several balancing products, possibly with different FSPs, as Value Stacking is actively promoted in the network codes.
- ENGIE expresses interest in changing the penalties, particularly in aFRR where a new, small Delivery Point could cause a large penalty if the BSP has other large DPs in its portfolio, and this could prevent innovation.
- Answering a question from Elia, Febeliec precises that it is important to open the flexibility to Low-Voltage. So, either Elia should implement ToE for LV, or open flexibility to LV without ToE (which is not the preferred solution).
- FEBEG insists that Transfer of Energy needs to be there, it is not an option not to have it.
- Luminus suggests that for every proposal an analysis of the overhead is made, in order to be able to prioritize. Elia agrees that prioritization must be done and put effort when there is an economic sense to it.

#### 6. EU & BE Balancing Program Update

- Febeliec asks why an exhaustive view on what is netted is needed. Elia precises it needs it for aFRR dimensioning, as we take into account the imbalance netting in the aFRR dimensioning methodology. With our connection to the aFRR platform, part of the netting potential will no longer be visible in the data we get from IGCC because it is now happening in the aFRR platform.
- Answering a question of Febeliec on whether the data on the volumes netted within the aFRR-Platform, Elia explains there are some ideas currently being tested in the prototype of the aFRRplatform to retrieve data related to implicit netting.
- Replying to Eneco, Elia precises that there is currently no volume on low-voltage actively participating to aFRR. Eneco asks if it makes sense to open low-voltage in mFRR in that case. Elia asks if the audience has any reaction on the reason why there is zero volume offered. Eneco thinks the potential is very low. Febeliec states that if the possibility is not given, we will never see the volume anyway. Elia is not sure to what extent low-voltage assets will participate to aFRR and/or mFRR in the future and in that regard believes it should remove barriers as much as possible without jeopardizing the quality of the services. Elia indicates that in this regard, it is among others performing a study this year to look at the possibilities to reduce possible barriers related to prequalification, communication and measurement requirements for low-voltage assets. Febeliec adds that another reason may be the Scada-to-Scada requirement.
- Febeliec comments that it would be inconsistent to have nothing made to open LV and in the meantime tell everyone that flex must be unlocked for incompressibility e.g. If used smart it can also be used for congestion management.

#### 7. Balancing Products Retrospective 2024

#### **FCR**

 Febeliec notices that FCR is cheaper on low-voltage. Elia confirms but adds that larger units on HV may be more interested to participate to other products.





#### aFRR

- Febeliec asks if there still are CCGTs in aFRR. Elia observes that historically costs & prices were strongly correlated by the Clean Spark Spread, while in 2025 this correlation is decreasing, which might reflect a shift in technology setting the price.
- Febeliec comments that it would be an important evolution if we could do aFRR without CCGT. Elia replies it is technology neutral.
- ENGIE asks if Elia has data on the use of elastic demand. Elia has observed that the platform has
  delivered in terms of costs and regulation, and in some periods elastic demand has been used and
  resulted in less high prices, but no specific slides were prepared on the use of elastic demand.

#### mFRR

- Febeliec comments they are surprised not to observe the prices going up when going to gate 2
  auctions.
- Elia notes a request from Febeliec to provide transparency on the imbalance price near or during incompressibility events.

## 8. BSP Faster Settlement incentive

Febeliec asks about the escalation process (e.g. to the regulator) in case Elia and BSP do not find
an agreement on an incentive. Elia precises that the process is rather the same as today, only
deadlines will be foreseen in the T&C. Febeliec wants that Elia does not waive penalties simply to
reach an agreement in time. Elia can agree to this.

#### 9. T&C BRP - Sequence of Go-Lives

Febeliec comments that when there is a workaround, it would be good to have it completely covered.
 Elia thanks the stakeholder for the remark.

#### 10. Evolution of the Working Group

- Luminus asks how this morning session would differ from specific workshops already organised.
  Elia replies those workshops are still formal, and the goal of the morning session is to have more
  open discussions. Febeliec adds that breakout rooms may not be desirable as there are not so
  many participants today. Febeliec is not in favour either of in-person only as it can prevent from
  some relevant experts' voices but notes however that such a setting can be useful to discuss topics
  that touch to congestion as well.
- FEBEG asks if it consists of a thematic working group. Elia precises the goal is to bring the dynamic of the CCMD Working Group, where we used to discuss the future.
- Luminus highlights that the agenda of the Working Group meetings is already full and does not see
  which subject should be dropped to make place for those morning meetings. We must look for
  efficiency and the right balance. Elia suggests perhaps it is possible for some topics to provide a
  pre-read one week before, then only present an executive summary and have a Q&A session.
  Luminus suggests having separate topics in an online meeting with only the right experts.
- Eneco remarks that actions from the Working Group meetings should be followed. Elia understands the point and that a list of action points could be included in the minutes of meetings.





## 11. AOB

• No comments from the market.

# 3. Date for next meeting

• WG Energy Solutions 19/06/2025 09:00 – 17:00

# 4. List of abbreviations

Area Control Error
Available Transfer Capacity
Balance Responsible Party
Balancing Service Provider
Combined Cycle Gas Turbine
Demand Response
Energy Management Strategy
Electrical Vehicle
Full Activation Time
High Voltage
Intraday
International Grid Control Cooperation
Load Frequency Control Block Operational Agreement
Low Voltage
Medium Voltage
Minimum Power
Real-Time
Single Day-Ahead Coupling
Single Intraday Coupling
Terms and Conditions
Transfer of Energy