

Workshop on connections with flexible access – 15/11/2024 – Meeting report

Meeting

Date	15/11/2024
Organiser	Antoine Weynants

Participants	Company
Elia	
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Jonathan Sprooten	Elia
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Valentin Guillaume	Elia
Maëlle Verheyden	Elia
Market parties present	
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Audrey De Jong	Synergrid
Eryk Masiak	Eneco
Valentine Faucon	Parkwind
Hugo Canière	Belgian Offshore Platform
Gunnar Watthe	DEME
Philip Eyckmans	Nyrstar
Pierre Martens	Orsted
Pierre Bayart	BSTOR
Lieven Van De Keer	BSTOR
Virginie Moens	BSTOR
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Jan Plaisant	Storm
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Ken de Backer	VREG
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Report

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1. Agenda

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- 4.** Grid Connection Study methodology: status

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- 5.** The impact on the BSP and CRM
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2. Report

These minutes should be read together with the accompanying slides. The explanations given by Elia on each topic are to be found in the slides and are not summarised here. These minutes focus on reflecting the core of the discussions that have taken place.

1. Introduction

Updates on design presented in previous workshops

2. Revaluation of flexibility: updated process

BSTOR asks if we keep our position in the queue for the reserved capacity in case of revaluation. **Elia** confirms, this is the main purpose of the reevaluation.

BSTOR asks if it described in the Code of Conduct.

Elia confirms it has been integrated in the proposal for Code of Conduct.

BSTOR asks when it will be published.

Elia answers that its second proposal of Code of Conduct will be published in the week of 22/11/2024.

3. EOS/EDS technical report

No comments received.

4. Grid Connection Study methodology: status

BSTOR asks how and when the reference context is defined. This is missing in the methodology. Also, there is a risk that when Elia takes longer that the time foreseen in the CoC, the study is performed later can be based on another, less favourable reference context. Clear rules are needed for the next methodology and the assumptions that are used for the studies, to not be penalised by Elia's delays and to increase transparency.

Elia: We can publish a high-level description of the reference context if the Market parties have a need. The reference context is not updated at the time of each EOS/EDS but is typically updated once a year. Therefore, for all studies between date A and B, the same reference context is used. Concerning the delivery of connection studies, in its proposal for update of the Code of Conduct Elia has proposed a more realistic timeline that we plan to adhere for all EOS/EDS (120 days).

To sum up, there are two sets of rules:

1. Rules for the study methodology: will be published on Elia's website before end of this year.

2. Rules to define the reference context: will be described and published in the context of the taskforce scenario in 2025.

Febeliec: Who will decide/approve the methodology? Febeliec does not agree with what Elia is proposing.

Elia: After discussion with CREG, we have proposed to include some parts of the Grid Study Methodology in the Code of Conduct (i.e. main principles), and to keep the detailed and practical arrangements in the detailed methodology note. This allows for easier update based on Elia's experience or based on grid users' feedback. This update process will take place publicly.

Febeliec: The Code of Conduct will be consulted by CREG and is not yet decided. It feels like Elia is pushing to have everything approved. Elia refers to the proposal made in the Belgian Grid, but Febeliec does not agree with this proposal. We need a better governance.

Elia:

- The proposal made by Elia is conditioned by CREG's decision on the Code of Conduct. A good balance is needed between what is regulated and what should evolve quickly regarding the methodology. We propose an approach where we involve Market Parties and take into account their comments along the workshops we have had.
- The grid study methodology that we are going to publish is aligned with the current Code of Conduct. We understand that it is better for everyone to have something published (publication is not imposed by the current Code of Conduct) and improved based on all exchanges that took place during the year.

ENGIE: Is there a discussion about the level of the thresholds? It is an important parameter in the balance that we are trying to find in the framework and FEBEG disagrees with the last workshop's proposal. What will Elia publish?

BSTOR: Could you re-explain why this threshold whether or not to consider a CNE is not in the code of conduct? The threshold on the PTDF has a major importance on the final results.

Elia explains that the flex/firm threshold is in the proposal for Code of Conduct, which will be published. This threshold which defines which cost is socialized and which cost is borne by the Grid User is important for the business case and should be regulated. The criteria for (not) considering some CNEs (Grid User's impact on the congestions) are not. The zone of influence was initially defined by expert judgment, now a formula trying to reflect this judgment is defined but the formula will need to evolve to best represent the real physical zone of influence.

Additional evolutions foreseen as a next step

5. The impact on the BSP and CRM

CREG clarifies that they explicitly asked Elia to find a solution to mitigate BSP's impact, not just assess if it's possible. It's not just a matter of searching for a possibility to mitigate the impact on the BSP, Elia has to come with a solution to avoid that here is an impact.

Elia answers that “no impact at all” might not be achievable and that it’s the objective of the discussion to show the status of the reflections.

BSTOR: we don’t understand the risk identified of strategic bidding. If Elia doesn’t know in advance which volumes will be activated, how could a BSP have the information needed to submit bids in the knowledge that penalties will be waived?

Elia clarifies that, in the framework of the flexible access, we will use Gflex and activate in real-time even when the congestion is detected in advance. While it will not always be the case, there are situations where the Grid User / BSP will be able to anticipate Gflex activations. In this case, there is a risk of strategic bidding.

Febeliec: Applying modulation in real time is an Elia's choice, with negative consequences. Activating Gflex should remain different than activating Redispatching on a unit with permanent access. Therefore, starting to cover BSP's impact would mix the two concepts (firm and flex).

Elia explains that we need to face these challenges. We indeed have a focus on real time products for the moment, as it allows to significantly decrease the frequency of activation and hence the level of flexibilization imposed to grid users. But what we propose is to find robust and effective solutions, not half-measures.

Febeliec: There are discussions only about generation and storage but not load. For a producer Grid User, CRM and Gflex are unrelated, but not for load, for which there might be different conclusions and impacts.

Elia: we have indeed for the moment focused on real time products, and the conclusions are not always the same for load. This will be handled in the next part of this workshop, where we shed some light on our perspective on how things should evolve. There are elements on different time frames and on remuneration, so we want to tackle all these topics. We hope at the end of the day you have better view about the all these different pieces.

Febeliec: the term Gflex (focus on generation) is poorly chosen. What about Lflex?

Elia: Gflex is used for brevity but should be understood as a generic term. It is foreseen of course to cover both. When we use the word Gflex it has to be seen as technology neutral, even if the G is an acronym for generation.

Febeliec: We are again socializing too much in these discussions.

Elia: The purpose of the presentation is to illustrate the complexity of bringing corrections to the BSP penalties. This does not mean that, once a solution is found, we will apply it in all cases. Elia believes that, in some situations, it might be justified to simply keep the penalties. This will be discussed in the next workshop.

ENGIE: In real time, it's difficult to evaluate activation costs of flexibility. When pushing as much as possible the real time activation instead of taking measures with redispatching, you cannot assess the fact that it is the cheapest for the society.

Elia: We note the comment. This is a topic we will tackle in the chapter 'Definition of a consistent set of Congestion Management Products'. Going further away from real time as other impact in terms of cost for society and we will try to shed light on that this afternoon.

ENECO: We appreciate the efforts made and the acknowledgment from Elia that the impact on the BSP should be reduced, but have some questions:

- What about energy management strategy / impact on state of charge for batteries? What if Gflex impacts a battery recharge needed for subsequent service provision?
- Some assets have a parameter called minimum stable generation, meaning you cannot curtail below this value, it's just not safe to operate asset under that limit. It also applies to wind not only CCGT. For example, for wind that would be between 5 and 10% of nominal capacity that you cannot go under.

Elia:

- On the impact on the state of charge: correcting penalties occurring after a Gflex activation which has prevented the battery to recover the right level of state of charge for delivering the service, is indeed an additional level of complexity which is not handled at this stage. Elia believes mitigation measures can be found, but those will not be perfect. Elia adds that this is actually also the case for Redispatching: a redispatching activation impacts the state of charge of the battery, which might then not be able to deliver the balancing service.
- On the minimum stable generation, this is indeed something we indicate as an attention point for the grid user. When a Grid User requests an orientation study and we see there's a risk that flexibility need to be activated below a typical minimum power, this is something we indicate in the report. Afterwards it is the choice of the grid user to continue with this connection. In case of balancing activation requests in the same direction than the Gflex constraint, this will be discussed in the discussions on baselines.

BSTOR asks why we can't adapt the definition of the Forced Outage in the T&Cs BSP aFRR to better reflect the Gflex dynamics (slide 18 on "quick wins").

Elia: Either we use the existing Forced Outage definition as a quick win, either we develop a more elaborated solution with specific rules for Gflex... which is actually what we are looking for. So in slide 18 we're not saying anything more than "applying the existing provisions for Forced Outage is inappropriate".

BSTOR questions why declarative penalties recovery requests are not used. Compared to the already existing complexity, this should be quite straightforward.

Elia: if we come to that point, we will need to have rules about what is acceptable and what is not. If we develop those rules then it is better to anticipate what will be the impact in the penalties and we can decrease the discrepancy in the aFRR and the mFRR delivery of the calculated amount of MWh.

Febeliec: Flexible access aren't firm access. If an asset lacks technical capability there is no network access. Why require compensation during flexibility activations in BSP activations? It's flexible access. Compensating will impact tariffs and the society (the consumer) will pay for it.

Elia: We are analyzing this topic. We are focusing a lot in these slides on how we could correct, but this does not yet mean, from an Elia point of view, that it would be appropriate to correct in every situation. For instance, within the contractual boundaries, it's not obvious at all that penalties from capacity limits should be waived. So we have two dimensions here: principles (when should we correct) and feasibility (how to do it). The workshop of December will focus on the principles.

6. Management of mixed sites

Febeliec asks how to interpret the definition of the Delivery Point for load, as there is no primary energy source.

Elia explains that the notion is used for different purposes. A delivery point is a point located in the installations of the grid user and used to isolate an asset or a group of assets from the rest of the site in order to measure a service provided by this (group of) asset(s). In this case, we look at the way to calculate the needed flexibility in the grid connection study, knowing that eventually the Gflex setpoint will need to be respected at the level of the connection point.

Febeliec: Then the next step is to clarify how responsibilities will be defined in the case of a CDS: is it the connection point or the access point?

Elia: the comment is noted. If we agree on the principles, we will need to further define the contractual setup.

Elia clarifies that, in case of differences between connection point and access point, this difference is already handled at the level of the grid connection study.

Febeliec: referring to the discussion in Belgian Grid, if I have a 100MW firm connection for offtake and I add a wind park without changing my PPAD because I plan to use the production, you still might give me a flexible connection.

Elia: if no injection capacity is requested for this wind park, it's a minor change, so the access will remain firm.

BSTOR suggests looking at the feasibility to share the PPAD. Some Grid Users have hurdles to connect to the grid because of lack of flexibility.

Elia answers that it's part of things we could look into in the future as it could be a good solution for some Grid Users. This being said, complexities need to be tackled step by step and we start with focus on one site.

7. Specific needs of demand facilities

Febeliec: Case-by-case and sandboxing approach is important, especially for capable demand Grid User.

CREG: CREG's draft Code of Conduct decision will include sandboxing for pilot projects.

Febeliec: How to initiate sandboxing discussions?

Elia: The CREG will put in the Code of Conduct to clarify exactly what the sandboxing is. But the Grid Users go through their KAM. The Grid User propose a concrete case and we start a pilot project if deemed viable.

Long-term solution

Target Model

8. Optimized approach considering flexibility, from grid planning to operation.

Elia explains an unmentioned point: If there is no grid reinforcement needed (as result of the CBA – preference for a remunerated flexibility solution), there is no temporary period required.

Febeliec: Three questions:

1. Flexibility costs: how to calculate the flexibility cost? It is a difficult point, especially for demand facilities where you have no idea how the business works and no idea on how the markets will evolve (e.g. cost of a delayed train).
2. You cannot break an existing permanent connection (unless willingly).
3. For demand, if we get curtailed, we are getting less and paying the same tariffs. So, we need a tariff reduction.

Elia:

1. Flexibility cost: we are still investing in the grid and we aim to have a limited volume of flexibility. But it is important to have a forecast on the flexibility cost. This cost could somehow be based on a regulated formula to limit the financial impacts.
2. TOTEX requires sufficient flexibility availability. Some Grid Users types are obligated to provide some flexibility (e.g., redispatching for generators and storage > 25 MVA). Existing Grid Users without “contracted” flexibility will only be counted if they are willing to offer their flexibility.
3. Tariffs: this will be covered later

Infrabel: We need to consider who pays for what. Currently, only demand pays for the grid. Now Elia is suggesting remuneration for production and storage flexibility which don't pay tariffs.

Elia: Production and storage facilities would be remunerated for a service, with the objective to lower total societal costs.

Febeliec: Costs must be correctly allocated. It's not logic to reinforce the grid for production and to have only demand paying for it.

Nyrstar: We are an electricity-intensive company and we have to be globally competitive. But the tariffs are doubling next year. If costs are not controlled, there will be no positive business case for electrification in Belgium, leading to a lot of stranded assets where the grid has been developed.

Elia: Elia can only note the comment as it is related to tariffs and regulation even at EU level.

Febeliec understands, but notes that the CREG is in the call and can take note of this. This is broader than a technical discussion.

Nyrstar: If we invest to become flexible, we need some certainty on the remuneration of this flexibility on the longer term, that's the only way to secure the business case.

Elia: Regarding the remuneration, it could be either a remuneration for each activation, a reduction of tariff or a combination of both. Elia emphasizes the need to explore those different models.

BSTOR: Here, we speak of optimizing network costs, not total societal costs. For example, the approach could lead to low network tariffs but to higher balancing costs.

Elia: The current CBA methodology (used for proposing a federal development plan) is regulated and considers all societal aspects. What we want to do is to be able to compare the results of this CBA solution (which includes welfare increase from investments) to an alternative version of this CBA that takes into account a limited amount of flexibility that is used as alternative to some investments (OPEX and CAPEX).

ENGIE:

1. Is flexibility temporary or potentially long-term network management?
2. what does the sentence in the slide 43 "no structural cost associated to the existing Grid User" mean.

Elia:

1. Based on the CBA result, if (remunerated) flexibility is the chosen solution, this would be a long-term (permanent) solution. This means Elia will rely on congestion services offered by all Grid Users (see discussion on future products). Note that later, an updated CBA may highlight that a Grid reinforcement is becoming economically justifiable.
2. The current law imposes to build development plans with the criteria that all structural congestions are solved once the grid is developed according to the plan. Objective is to have some degree of freedom on this parameter when it's economically justified.

Febeliec: For existing facilities, being flexible needs to be voluntary.

Elia confirms the idea is to make it voluntary for demand facilities.

ENGIE: Long-term investment is needed for energy transition.

Nyrstar: It is important to avoid to over-invest in an under-utilized grid.

Elia: What we want to achieve is to cut the tail of the investment and not having to reinforce the grid for the last MW requested, which would lead to an oversized grid.

BOP: What will be the time dimension for the grid reinforcement, how can you assure the needed capacity for the Grid Users?

Elia: It's a long-term commitment that is aligned with the timing we have to find a CAPEX solution. We can only accept not to invest if we have a guarantee that the flexibility will be available, so a long-term commitment is required.

Febeliec: We need to be able to make new plans. Maybe I have some flex now, but in some years I will decide to use my full capacity. Will Elia then look for alternative means? Other grid users in the neighbourhood that might be flexible, but have a permanent connection, who will deliver the flexibility?

Elia: We need to be sure that the flexibility is available in operation. In addition, we will not do this trade-off in the context of a connection study. An idea could be that, when we prepare the development plans, we make a call for flexibility offers.

Nyrstar: We are prepared to consider it and to commit in the long term, if Elia also commits on the financial aspects.

Elia adds that there are 2 potential benefits for the Grid Users in situations where the grid is not yet fully developed: there would be no temporary period and the flexibility would be remunerated.

Infrabel: How to take into account that a Grid User can connect at different places on the grid? Elia could propose to the Grid User an alternative connection, further away and hence more expensive, but which will avoid congestion.

Elia: Elia anticipates the need to reinforce the grid, not during a connection study, but in the context of the development plans based on the scenario that are published and consulted. That's why it's important to involve stakeholders in the discussion on the scenarios.

Enablers

9. Optimization of flexibility activations in operations

Febeliec : Optimal usage of all flexibility should include not only real-time (RT) products but also day-ahead (DA) products and others. Focusing only on real time reduces the available means. First because you will always activate the same ones and second it might be less costly to activate a Grid User in day ahead then in real time. This impacts also the business case, some grid users can't provide flexibility in real time and will never be activated.

Elia fully agrees that a real time product will not be the only one needed.

FEPEG: Elia says that all technologies should participate. Does "all flexibility" include all voltage levels?

FEPEG: Fluvius is developing products for congestion management. Elia could contract/buy and utilize them.

Elia: Our vision addresses all voltage levels managed by Elia. For the DSO, alignment is needed. Elia underlines the importance of harmonizing the different frameworks.

Febeliec: Could we go further by activating cross-border resources?

Elia: This is precisely the objective of the ROSC project.

ENGIE: In a market-based approach, going closer to real time will reduce volumes and increase costs. Combining real time activations with redispatching is complex, as some are remunerated while others are not.

Elia acknowledges the challenge in calculating or allocating costs.

Note: the next slides show that the objective is to decouple the technical and financial modalities of the flexible access.

Febeliec: Demand side has no choice in location (existing site, proximity to waterways,...). Febeliec agrees with the principle of cost allocation, but is not willing to sign a blank check. Who will pay if the cost estimations are wrong? The concept is acceptable, but the implementation needs clarity.

Elia takes note of the comment. Cost allocation will indeed be complex, a methodology is needed and we expect a lot of discussion, but we see a lot of added value, especially for demand facilities, in this model.

BSTOR: First, if a congestion risk is identified and the grid user is informed but not activated, it should be deducted from the cap. Second, the merit-order approach is not acceptable (in the context of the temporary period).

Elia: Explains that the short-term proposal of flexible access (aiming at connecting earlier to the grid waiting for a grid reinforcement) is proposed with the proposed activation order.

The long-term solution involves evolving toward an activation by merit order with the willingness to maintain incentives for the grid users asking for a connection pursuing the same goal as the ones provided today (location and/or timely connection request). This implies that some costs should be borne by the grid user asking for a connection where there is no capacity, and thus a cost allocation mechanism that, we recognise, will be complex.

Regarding the short-term, the proposal is in the hands of the CREG with the principles described in the Code of Conduct.

Otary shares concerns that temporary flexibility is used to avoid network reinforcement.

Elia: The trade-off to be made will be between investing in grid reinforcements, or using remunerated flexibility. It is not the goal to decide to not invest and instead count on existing GUflex contracts without remuneration.

Once the decision is made to reinforce the grid, we will still have Grid Users who would like to connect before the grid reinforcement. In this case we have to propose a temporary flexible connection contract which implies that some costs are borne by this grid user. But the objective remains to anticipate where the Grid User come in order to reinforce the grid at the appropriate locations.

Febeliec: the decision between CAPEX or OPEX during Federal Development Plan has significant impact. The choice has an impact not only on the business case but also on societal cost.

Elia: It is all about potential for developing certain technologies on certain location.

Infrabel: What are the frequency and horizon of regional and federal development plans?

Elia: Explains that project portfolio extend beyond federal development plan duration.

10. Definition of a consistent set of Congestion Management Products

Febeliec: Activation costs could increase (with a higher occurrence or longer activations) and should be factored into product development.

Febeliec: Products must be adapted to the needs. F.i.: real time is not suitable for load, must-run requirements are not possible for Infrabel, etc.

ENGIE :

1. Importance of how to contract the product (e.g., long-term bilateral contracts).
2. Elia prioritises the importance of real time, while in the Netherlands Day-Ahead activations are used. Which for market parties allow much more possibility to see and forecast what is the cost.

Nyrstar: Explains that in the Netherlands, based on Day-Ahead products, they would be curtailed 50% of the time. We prefer real time modulation 1% of time over 50% in DA.

Elia refers to the importance of a consistent set of products. With of course the societal optimization as an important aspect.

11. Remuneration model

Febeliec: INC-DEC gaming is already observed in neighbouring countries with a very high wind price profile and some coal plants in the same region where this is applied in the day ahead market and sadly the regulator is not doing much. We don't want this in Belgium.

Otary: Challenges the example of gaming, which is too simplistic and local. How does it impact the global strike price on a Belgian scale?

Elia: Inconsistent bidding compared to marginal price impacts clearing price. Elia refers to examples that are known in Germany. Some parties will have the incentive, knowing that they will be used to solve congestions and because they know the revenues they can obtain through congestion management, to change their bidding in day ahead. That already is a distortion.

ENGIE: Question on the paradox. Will increased congestion makes prediction easier? Because the technology mix will evolve in Belgium and Europe.

Elia: Trends will be easier to anticipate (e.g., high wind often triggers activation). Combined with the freedom of dispatch and the transparency that we have in Belgium (Forecast, publications of prices, CRI..), the gaming risk increases.

Gaming is essentially trading and optimizing revenue. We must avoid rules that encourage such behaviours, which are not in the societal interest.

BSTOR: Is there a reference where congestion management market-based works without gaming? A fair price is when an offer curve can meet the demand curve. Here an offer curve is easy to set, but it is difficult to define a demand curve. Maybe an evolution towards nodal pricing or more smaller bidding zone could work?

Elia: Elia aims to show why fully market-based redispatching isn't trusted but must regularly justify the approach. Elia is aware that in the future having a cost-based approach has limitations and can be seen as unfair for the market parties. Elia is looking for adequate solutions, that have advantages of both approaches. It's not binary (market or cost-based); other solutions like capacity based exist.

ENGIE: The French approach (call for tender) might be better. To decide on investments, flexibility contracts for the long term must be considered and priced accordingly.

Febeliec: It could be a way to solve congestion management but the offer will not be the cheapest one. If an actor commits for 10 years, and the next year you can have another offer cheaper, but you are locked with the first one.

BSTOR: VSP model could be a solution?

Febeliec: Is there a free price for VSP ? The limitations can be imposed by the Minister.

Elia: The goal is to highlight the problem, not to seek solutions today.

Eneco: According to the formula Elia proposed it should be revised. Activations at cost for storage equates to a loss. Without a business case, frequent activations are unsustainable.

Infrabel: Queries if market power becomes a bigger problem than in the past, what would be the mitigation ?

Elia: During the grid development plan, we identify potential in given areas, there we identify as well whether we need CAPEX or OPEX solutions. Where we see that we have a lot of OPEX solutions we translate it as a bigger need of congestion management. So that's a consequence of the Target Model where we make a trade off between CAPEX and OPEX. We will have more congestion than we have today. This is why it is important to have a design that is not triggering the risk of distortion. As a side note, this issue of distortion is distinct and not necessarily related to market power.

12. Methodological developments required in long-term grid planning.

Febeliec wonders how Elia plans long-term (20 years) in a constantly changing context.

Elia: Acknowledges complexity, with cost estimation being the trickiest part that will need to be designed.

13. Roadmap – main principles

Febeliec: Inquires if sandboxing happens in parallel with the short term.
Elia confirms discussions on POCs can already be initiated now.

Febeliec: Different phases shouldn't be purely sequential. There should be a transversal stream.
Elia: Explains that in 2024, GUFlex1 design was the focus but there is still work to do and we cannot address everything in parallel. This is why we propose a phased approach.

Febeliec: Points out an important missing link: pricing (flexibility should affect tariffs), including involvement and harmonization of various regulators.
Elia: Clarifies this will be analysed in the Target Model. Elia will identify a streamline where we look at the tariff's implementation. We are collaborating with the DSOs to align our visions.

BSTOR: What is still ongoing in GUFlex1? When will you do the handover to the CREG with this part of the design? When will the new code of conduct and the adaptations will be discussed?

Elia: Elia submitted the code of conduct to the CREG and we are waiting for the public consultation of the CREG, and we need this and the final decision on the Code of Conduct before to amend the other regulated documents (Connection contract, Coordination Rules, T&C BRP...)

14. Conclusions and next steps

No comments.

3. Date for next meeting

- 11/12/2024 - Workshop on connections with flexible access.