

## **Febeliec answer to the Synergrid consultation on Modelovereenkomst FSP-DNB (flexibiliteit) – Modèle de contrat FSP-GRD (flexibilité)**

Febeliec would like to thank Synergrid for this consultation on the FSP-DNB/FSP-GRD agreement. Febeliec has at this point already a number of comments, but also wants to highlight that this document will have to be revisited in the future based upon upcoming changes in the balancing but also energy markets.

With respect to the whereas of the document, while Febeliec understands that the DSOs are concerned with point 4 on the simultaneous activation of flexibility by several distribution grid users, Febeliec wants to reiterate its longstanding position with respect to demand side response related to this topic: as it is not allowed to force any distribution grid user to consume electricity (in other words, any grid user can freely decide when he wants to consume electricity), Febeliec would not accept this argument towards demand side response (as opposed to generation, where indeed concerns may arise), as the grid has to be dimensioned to allow grid users to not consume (and also consume of course) when they want.

On the document itself, Febeliec is not convinced that the document takes sufficiently into account the situation of closed distribution system connected to the DSO grid. Indeed, for several articles, in particular for example article 7, it will be the closed distribution grid operator who will have to perform certain tasks (e.g. metering data), while the closed distribution grid operator will most likely not be the flexibility service provider.

With respect to article 4, Febeliec strongly wants to urge Synergrid and its members to allow more than one flexibility service provider per delivery point. The proposed limitation forces the owner of the delivery point to select one single FSP, while it could be that different FSPs offer better solutions for the different flexibility products (e.g. FSP A for FCR, FSP B for mFRR, ...), thus allowing competition to play more freely. This will presumably lead to cheaper solutions as well as more participation of grid users, which will also help system operators to better cope with current and future challenges. As such, Febeliec adamantly asks to relax this limitation and if the limitation would be maintained that this could only be for technical reasons (e.g. systems not yet adapted), in which case a clear and firm deadline should be decided in coordination with the regulators and the grid users for removing this limitation, and this as soon as feasible.

With respect to a.o. article 5, Febeliec insists that in case of modification not only the flexibility service provider but also in parallel the concerned grid users(s) are informed, to ensure that they are at any point aware of what is happening with the service delivery points.

With respect to annexe 1, Febeliec opposes the limitation of most of the mentioned services (FCR, aFRR, mFRR, strategic reserve, ...) to the high voltage grid, as it believes that with the on-going changes in the market in combination with the ever-wider roll-out of smart meters and AMRs, the scope should be extended to the medium voltage and even low voltage grids, if the DSOs indeed want to advance the development of flexibility (whereas point 2). Febeliec also refers to its first comment, as it believes that the proposed list of services might have to be substantially extended in the future. Febeliec also wants to refer to its comment on article 4.