

Febeliec answer to the Synergrid consultation on Flexibility v2

Febeliec would like to thank Synergrid for its consultation on flexibility, on the Market Guide Flexibility, the Synergrid Prescription C8/01 and C8/06 and the FSP-DSO Agreement.

Febeliec in general would like to insist that all public system operators do their utmost best to remove **all** barriers in order to ensure that **all** flexibility can find its way to **all** markets, towards frequency and non-frequency related products of system operators but also explicit and implicit participation in the energy markets. Febeliec finds the current proposals only a very small (positive!) step in this direction, as it will allow a.o. aFRR on low voltage, but it is by far not sufficient to attain the abovementioned ultimate goal. Febeliec thus wants to urge most strongly that all system operators and regulators accelerate their endeavors on unlocking all flexibility in the system to the benefit of all grid users through more efficiency and a lower overall system cost.

Market Guide Flexibility

Febeliec would like to make following comments on the Market Guide Flexibility. In general, and as will become clear from the comments below, the specific provisions for CDSs still need to be added, and it seems as if the overall reflection and analysis has not yet been conducted, which Febeliec regrets. Febeliec insists on the importance hereof, as most of current flexibility comes from industrial consumers (a.o. due to incomplete or not yet started smart meter roll-out to low voltage, not all products already available for all types of grid users, ...) and a substantial share of this flexibility is located within CDSs.

On the **definitions**: Febeliec insists that these are aligned as much as possible with the definitions used in other regulatory documents, in order to avoid any confusion. Febeliec refers a.o. to CMU, but also DSO (with the specific situation of CDSOs which are according to European legislation also DSOs and where any confusion between public and closed DSOs should be avoided; a definition of CDSO or specific specifications on the role of the CDSOs are lacking); definitions for a CDS and CDSO are not included in the document.

On the **roles and responsibilities**: The role of the CDSO (if applicable) is not mentioned, where it is clear that a CDSO as relevant system operator for the grid users in its grid has a major role in the market roles diagram (if applicable). The same applies for the contracts between market parties diagram as the CDSO will also play a role there (if applicable).

On the **flexibility product overview**, Febeliec regrets that for low voltage no mFRR, SDR and ToE in DA/ID are included. While Febeliec understands that participation from DSO-connected grid users to these products might not be possible today, it hopes that these will be added as soon as possible.

On the **metering requirements**, Febeliec insists that not only the FRP and DSO need to define the relevant metering requirements, but that (when applicable) also the CDSO is included in this discussion. Moreover, Febeliec also most strongly insists that for flexibility products, not only metered values but also calculated values (based on metered values) should be allowed, insofar that a correct perimeter can be defined for the determination of delivery of the service (as is currently already the case on the Elia grids).

On **prequalification**, Febeliec insists that also the CDSO (when applicable) as relevant system operator for the grid users in his grid is included in the flow. The same applies for the **gateway** and its setup, as well as for **update and stop of the service** and so on.

On the **Net Flex Study** (NFS), Febeliec is of the opinion that this does not bring a lot of added value for demand side response, as grid users are currently free to consumer whenever they want (except under very specifically delineated situations of curtailment) and within the range of the capacity of their grid connection. Febeliec considers the NFS a barrier to participation, as it does not bring much added value, unless it would enforce or limit certain consumption behavior and profiles for consumers, involuntarily, which is unacceptable (unless as described above under very specific conditions primarily linked to grid security). Febeliec thus most strongly pleads for the abolishment of the NFS for demand side response (but can understand its added value for certain other categories of grid users, with a different constellation). This reasoning is already clearly accepted in Flanders for low voltage, as no restrictions will be imposed

Febeliec represents corporate energy consumers in Belgium for whom energy is a significant component of production costs and a key factor of competitiveness. Febeliec strives for competitive prices for electricity and natural gas for its members, and for more security of energy supply in the context of the energy transition. Febeliec's members are 5 sector federations and more than 40 companies from various sectors (chemistry and life sciences, petroleum products, glass, pulp & paper and cardboard, mining, textiles and wood processing, brick, non-ferrous metals, steel, transportation, construction materials, data centers, telecommunications). Together they represent some 80% of industrial electricity and natural gas consumption in Belgium and 225.000 jobs (www.febellec.be).

for this category, and should according to Febeliec be extended to all voltage levels and all regional and federal public grids.

On **prequalification**, Febeliec insists that also the CDSO (when applicable) as relevant system operator for the grid users in his grid is included in the flow. The same applies for the **gateway** and its setup, as well as for **update and stop of the service** and so on.

On section **4.2.4**, while Febeliec regrets that for low voltage only 1 SDP-Flex can be registered per product and only at headpoint level (Febeliec considers this a barrier for full valorization of flexibility), it most strongly insists that such limitations are not acceptable on medium or high voltage.

On the **determination of the nominal reference power, prequalification checks and tests by the FRP and so on**, Febeliec again insists that also the CDSO (when applicable) as relevant system operator for the grid users in his grid is included in the flow, in particular whenever tests are to be conducted, as these will also have an impact on the grid of the CDSO (in a similar approach as the procedure to include the DSO and for similar reasons).

On the annexes, Febeliec has not had the opportunity to deep dive in all documents, but already wants to explicitly refer to its comments on CDSOs and the need for their inclusion in several of the issues covered by the annexes.

Synergrid Prescription C8/01

On the Synergrid Prescription C8/01 on the Network Flexibility Study (NFS), Febeliec insists on the need in some cases for the inclusion of the CDSO (when applicable) as there might also be potentially impact on its operational safety. Moreover, Febeliec evermore struggles with the concept of such an NFS, which it considers a barrier as it does not bring much added value while creating costs and delays. Febeliec considers that any grid user should be allowed to valorize his (demand side response) flexibility as long as this does not exceed the agreed connection capacity, insofar that consumers can not be forced nor forbidden to consume electricity (except under very clearly defined emergency situations for curtailment) and as such an NFS would not provide any additional value as the grid user can modulate his consumption pattern at free will within the agreed grid connection capacity. Febeliec most strongly urges the complete abolishment of the unnecessary NFS, which provides no real additional tangible information on the future behaviour of a consumer. Furthermore, Febeliec also wants to highlight the need in some cases for the inclusion of the CDSO (when applicable) as there might also be potentially impact on its operational safety.

Synergrid Prescription C8/06

On the Synergrid Prescription C8/06 on metering and gateways for aFRR service delivery points, Febeliec at this point has no explicit textual comments, but insists that these technical requirements cannot be allowed to become barriers to entry into the aFRR market, by undue gold-plating related to the technical requirements. Febeliec insist on a cost-benefit analysis which maintains a balance between exactitude and allowing more flexible assets to participate in a market with at this moment important liquidity issues. More participation could have a very positive impact on the overall system costs, even if this implies a possible theoretical loss due to some more freedom on metering and gateway requirements as the benefits for the system would outweigh most negative impacts..

FSP-DSO Agreement

On the FSP-DSO Agreement, Febeliec also explicitly wants to refer to the need in some cases for the inclusion of the CDSO (when applicable). This could for example include the identification (EAN), testing, activation of flexibility, metering, validation and so on. Febeliec refers in this context also to the other comments made above. Febeliec does not consider this a blocking point, but nevertheless provisions need to be included which reflect and accept the central role of the CDSO as relevant system operator for his grid users.