Synergrid

Federatie van de elektriciteits- en gasnetbeheerders in België
Fédération des gestionnaires de réseaux électricité et gaz en Belgique

Vision paper:

Multiple supply contracts per Access Point

Appendix 2: Itemized overview of received feedback and reactions made

#	Ref. Vision Paper	Author	Topic	Comment	Reaction	Change in paper
1	N/A	Infrabel	Focus on private meters	Applications developed by DSOs focus too much on private connections -> quid companies managing multiple connections ?	The vision paper deals with multiple supply contracts per Access Point. As explained in the document, it does not alter the rules for assigning Access Points. Companies with multiple connections will therefore be able to use the concepts defined in the paper, but they will not change the fact that they have to deal with multiple connections.	No
2	Section 6.5	Infrabel	Cascade principle	Infrabel opposes to the cascade principle: for multi-site users the DSO should invoice the grid user directly (i.o. the supplier)	The cascade principle has a legal basis. Our vision on multiple supply contracts does not require to divert from this principle.	No
3	N/A	Infrabel	Rail Traction Grid Status	Rail Traction Grid: legal status granted to Infrabel but still not implemented at DSO side --> quid if an underlying consumer wants to exercise its free choice of supplier, especially in the case of mobile consumption (no link between consumption and the interconnection point with the grid) --> only option according to Infrabel: establish a global balancing zone for all connection points from which injection is made (both ELIA and DSO access points)	We are prepared to look at the details of the legal status of Infrabel. It is, however, a separate issue from what is discussed in the vision paper, as any issue would already exist today in the absence of multiple supply contracts. The vision described in the paper does offer additional possibilities to Infrabel, even though it does not address the issue of mobile assets.	No
4.1	N/A	Infrabel	CDS	Station building where SNCB/NMBS is the CDS operator (CDS connected to Rail Traction Grid). According to Infrabel, the concepts proposed in the Vision paper should not apply to CDS.	They do not. The vision paper applies to Access Points as defined in the Grid Code (on the distribution grid). Points within a CDS do not fall under this definition. Als the CDS grid code does not mention multiple supply contracts.	No
4.2	Section 5.2	Infrabel	Submeters / "Regulated Meter"	Approach to submetering in the Vision paper (5.2) is incorrect. "Regulated meter" terminology in inappropriate: A meter placed by CDS operator is no more or less regulated than a meter placed by a DSO. E.g.: energy meters placed on traction vehicles are fully regulated through railway legislation, even if these meters are installed and managed by a vehicle keeper (these would fall under the heading of private in Synergrid's scheme).	We will clarify that 'regulated' refers to the regulation applicable to metering for DSO processes.	Yes
5	Section 8.1	Infrabel	Terminology / confusion	Proposal to consider access point as physical data and allocation point as market data will lead to further confusion. At Elia level, a connection is the physical data and the access point is the market data. It seems appropriate to extend this terminology at DSO level as well; 1 access point could then refer to 4 connections (separate cables), for example. Allocation is best reserved for the allocation of electricity to balance responsible parties.	We will further explain the interpretation of the Access Point in the document.	Yes
6		Febeliec	MV users	However, for medium voltage/industrial/professional grid users, and as already indicated from the start of the discussions, Febeliec is adamant that more degrees of freedom are necessary than for residential grid users, as the use cases are different from a house with an electric vehicle (from the same or a different owner) and a heatpump and thus the model should tailor for more elaborate use cases with (many) more delivery points than envisaged for residential grid users in more complex patterns. Moreover, these medium voltage/industrial/professional grid users will need more degrees of freedom in how they re-invoice grid tariffs, surcharges, taxes and so on, as these can and will be tackled in their contractual arrangements related to all those delivery points.		No
7		Febeliec	Infrabel	Last but not least, a specific solution will have to be found for Infrabel as it is connected to several distribution grids (but also local transport grids and the transport grid) and will have yet again other use cases and constellations of delivery points behind its access points. Febeliec also wants to refer to and support the answer to this consultation by Infrabel.	We refer to our reaction on the Infrabel comments	No
8		Febeliec	Parallel connection	Concerning serial or parallel configurations and in light of the above, Febeliec appreciates the fact that both configurations will still be possible, as the parallel configuration resembles a shared connection, which could be of use in certain cases (and even combinations of e.g. a parallel with behind that a serial configuration).	We appreciate the appreciation.	No
9		Febeliec	Submetering	Concerning submetering, Febeliec appreciates the different types of submeters that are envisaged in the model, yet regrets that the number of submeters and related commercialised "appliances" (a description that is not really applicable to industrial grid users) are limited to 6 (or any lower limit defined in regional legislation) and would like to oppose such limitation for medium voltage grid users (as a future-proof design and implementation should not impede any further increase in this number in any case).	We do not exclude that the currently proposed limitations could be relaxed in the future. However, as we advocate a phased approach, in a first phase, the limitation will be the same for MV and LV Access Points.	No
10		Febeliec	Support for virtual and calculated meters	Febeliec would greatly appreciate the possibility for having virtual and calculated meters, which allow closer linking to contractual arrangements without necessarily the obligation to install submeters everywhere, as long as delineation of the perimeters of service delivery points can be correctly done.	If regional legislation allows virtual submeters and the DSO can obtain data from them with sufficient accuracy, the proposed vision does not preclude using them. However, we prefer a physical submeter (albeit not necessarily with the same characteristics as the head meter.	No
11		Febeliec	CDS	Furthermore, Febeliec wants strongly to insist that the principles proposed in this vision paper are not directly and necessarily transposed to closed distribution systems.	See reaction to same remark made by Infrabel	No
12	Page 7,8 & 11	ODE	Technology-neutral approach	The first target use cases one thinks of could be households with a heat pump and a leased electric vehicle, but it is important that there is a technology-neutral approach. All adjustable appliances need to be able to have a different supply contract from the introduction of this framework. - Electric boilers, heat pump boilers, private electric vehicles, and other electric (heating) appliances will also be part of this scheme. For clarity, these could be mentioned on page 7 and 11. - It should be noted that batteries and solar panels are adjustable appliances that can deliver useful services like reducing injection and providing reactive power. In situations where a third party owns these appliances, a submeter might be part of the business model. This could be mentioned on pages 7 and 11. On page 8, the sentence "Baseload, PV production and battery are not measured separately" should be completed with the words "in this example" to make clear the example is not limitative.	Page 7 already mentions that the target use case is only for illustration purposes and that the vision is more broadly applicable. The document already indicates that semi-regulated submeters are part of the vision. We will clarify "in this example" on page 8.	Yes
13	General	ODE	Non residential and higher voltage levels	The focus in this vision paper is on residential cases, but there are huge opportunities in non-residential settings and on higher voltage levels. ODE supports that it is explicitly mentioned that the principles for the residential households would also apply for non-residential cases.	OK	No
14	Section 6.2.3	ODE	Non-communicating meters	A good methodology to deal with non-communicating meters might be important for the customer acceptance of MSC4AA. Unlike the current methodology for main meters, the estimation in light of MSC4AA can impact who must pay the bill: the entity linked to the main meter, or the entity linked to a submeter will often be different. Extra attention needs to be given to missing data in the fifteen minutes that define highest monthly peak on the main meter (considering the Flemish capacity tariff). Example: if the missing data is assigned to the main meter while an electric vehicle was charging via a submeter that is billed to the employer, the employee will have to pay for the missing kWhs and there could be significant impact on its electricity bill because of the capacity tariff that is assigned wrongfully. Therefore, it should be very clear for which 15-minute intervals an estimation has happened, to allow this to be contractually arranged if no general rule is applied.	This should be handled in the validation and estimation methodology. It is, however, important that ultimately, the Main grid user remains responsible for the entire customer installation, and that as a last resort volumes will be merged with the Primary market Headpoint.	No

#	Ref. Vision Paper	Author	Topic	Comment	Reaction	Change in paper
15		ODE	Split of bill components (such as grid fee)	As a principle, ODE believes a grid fee split is important for a level playing field. Following, some points to take into consideration. **-Capacity tariff** As for the split of the capacity tariff, we want to emphasize that we are in favor of the first option, as this maximizes the incentives of each appliance to reduce power when there is offtake by other devices. Maximum offtake by an individual adjustable appliance should not be hindered when other devices are not consuming, so the second option is unfavorable and should be dismissed. For example: it could be preferable that a heat pump shifts consumption maximally to moments where there is no EV charging rather than focusing on limiting the monthly peak and consuming at the same moment the EV is being charged. As mentioned earlier, extra consideration is needed for the split of the capacity tariff when there is missing meter data in those fifteen minutes. **-VAT** VAT is applied to the grid fees and the commodity. The total VAT-cost would be lower with Optimized Gross Commodity Volume (OGCV) than with the Gross Commodity Volume (GCV) approach. This is one of the reasons we believe there should be a choice between OGCV and GCV. An extra attention point with VAT is that it can be recuperated by companies but not by residential owners. This could impact the assignment preferences when there is more than one submeter. **-GSC/WKC Quota + ODV and taxes** It is mentioned GCV would be used for GSC Quota. However, with OGCV the total quota obligation would be lower and as such OGCV would be preferred in certain scenarios, for example when there are bilateral agreements between multiple suppliers or when both submeters and main meter have the same supplier. This is another reason there should be a choice between OGCV and GCV. We want to point to the Flemish Flexibility Plan1 where the Flemish Energy and Climate Agency (VEKA) will analyze whether there can be an exemption of ODV or taxes for electricity storage systems that provide flexibility services, similarly to the exemption of GSC and WKC quota that already exists. --> In a parallel meter setup, with two physical main meters, the storage installation would be directly coupled to the grid. As such, the current solution could be contradictory with the current Flemish exemption of GSC and WKC quota for storage. (Article 7.1.10 and 7.1.11 of the Energy Decree) --> A reference to this initiative by VEKA in the vision paper could be welcome and it should be considered that in the future an exemption could be introduced for standalone storage and storage that is located behind a submeter. A possible methodology that could be used as an inspiration for the exemption of ODV, taxes or GSC/WKC quota is a methodology used in Germany, where there is a virtual "priority-assignment" and where all loading of batteries from the grid is considered as implicit flexibility. An example calculation would be welcome but could also be added at a later stage.	We are sure that each regulator will give attention to these considerations when assessing the potential impact on the tariff methodology. As for the last point, we do not propose to use the GCV, we propose to use whatever volume was used in the allocation. This could be GCV or OGCV depending on the customer choice.	No
16	Section 9	ODE	Market introduction	There are merits in both the approach with OGCV and GCV. Therefore, it is important that choice between both is possible. For example, when a homeowner has a contract for his adjustable appliance with a dynamic price and a fixed price for the baseload on the same name, a reduction of the VAT or GSC/WKC-quota is preferred via OGCV. As for electric vehicles both GCV and OGCV can have their merits, depending on the situation and agreements with the employer. For privately owned electric vehicles, the OGCV might be preferable in many cases, although GCV might have its merits when injection can be sold for a fixed price on the main meter and the electric vehicle has a dynamic contract and much flexibility in charging times.	We take note of this position, but the additional complexity must be weighed against the time to implement.	No
17	Section 12.2	ODE	Multiple injecting submeters, proportionality and priority	The examples that were presented during the product design group should be added to the vision text analogous to figure 22. ODE believes all the aspects of proportionality and priority should be thoroughly explained in the vision text. This would provide clarity for the readers and stakeholders that are not acquainted with the topic. The proportionality system could be complex to explain to residential consumers. ODE prefers the priority option at all steps of the algorithm. As such, self-consumption could first be allocated to the submeter with the highest offtake price, or the contract where the bill is paid by the same entity, etc.	We do not want to burden the paper too much but will see which examples could be added to explain the options while not being overly complex. In any case, the material presented at the PDG is publicly available for all and provides further background on the proposed vision.	Yes
18	Section 2 -	Flux50	General	The list of abbreviations is not complete. (p.4)	We will review the list.	Yes
19	Section 2 - Definitions	Flux50	General	Is it possible to re-explain all the definitions used in this vision paper? The many definitions and their abbreviations seem very confusing.	With the previous point, it should be fixed.	No
20	Section 5.2 Submetering	Flux50	General	We agree on: in time, we may increase this limit and/or differentiate between LV and MV customers but we prefer to start simple and gain maturity before supporting more complex configurations. (p.11)	OK	No
21	Section 5.2 Submetering & Section 7.2.1 Access to meter data	Flux50	General	The MDGU or his representative (e.g. the 3rd party) therefore has the obligation to register the submeter with the DSO.(p.11) and 'In our opinion, the MDGU is responsible for managing and approving third party access to all meter data (both for the main meter and the submeters)'.(p.31) It is correct that the MDGU is responsible for signing multiple supply contracts but the management and administration should be done by the service provider who wants to unburden his customer. It is a very big barrier to contracting the MDGU when he has to perform so many tasks. The market processes and procedures should for instance take this into account by mentioning always 'The MDGU or his representative'. For the service provider it is of the utmost importance that the administration can be done quickly and in bulk	We take note of this position.	No
22	Section 5.2 Submetering	Flux50	Metering data transmission	It is not clear how the metering data from a semi-regulated meter are transmitted to the DSO. (p.10)	This is an implementation decision that has not been taken yet. But it is correct that a choice will have to be made here, as well as on validation and estimation of submeter data.	No
23	Section 6.2.2	Flux50	Validation, estimation & rectification of submeter data	The validation, estimation and rectification processes may be less stringent than those of a (fully) regulated submeter: Why less stringent? (p.16)	There could be several reasons: - because the DSO cannot validate the accuracy of the data itself - because a regulator might consider allowing submeter data with a lower accuracy - because the data from a third party might be less reliable than the data collected directly by the DSO	No
24	Section 6.5 - Billing	Flux50	Gridfee split	The gridfee split (p.25): Please take into account that an Energy Management System (EMS) can control the maximum capacity of the Access Point and can control the capacity of the EV charging never surpassing the usual domestic capacity. In that case there is no reason to spilt the gridfee.	Not necessarily, the EV will still use the connection. In any case, the DSO will not always know whether or not the EV has contributed to the peak	No
25	Section 7.2.1.	Flux50	Access to meter data	The submeter must be physically connected to the main meter: How is that possible? (p.31)	Via an electric wire. The data collection of main meter and submeter can either go via the main meter or via separate channels.	No
26	Section 9	Flux50	Market introduction	There is a need for more explanation about the market introduction step by step. Experience learns that the market introduction by non-optimized steps makes the stakeholders unhappy. Step by step introduction for complexity reasons is acceptable but not for optimization reasons.	The step-by-step approach is definitely for complexity reasons. For example, capturing the choice of a grid user between optimization or not (and maintaining, trobleshooting, … it) is an additional complexity.	No

#	Ref. Vision Paper	Author	Topic	Comment	Reaction	Change in paper
27	Section 5.2 - Submetering	ELIA	Validation, estimation & rectification of submeter data	Tabel 2 provides good overview on what is in and out of scope for the data access management aspect for semi-regulated submeters. However, it is not clear which less stringent rules the DSOs have in mind for the treatment of the data. In concreto: - It is not clear how to differentiate between the responsibilities and associated actions with respect to data quality and validation, estimation, rectification. How is the data quality guaranteed? - If DSOs are not responsible for the data acquisition, what are the implications with respect to data quality?	We agree that harmonized rules for data exchange would be advisable, but the validation and estimation procedures go beyond the scope of a vision paper.	No
28	Section 5.2 - Submetering Section 6.2.2 - Val., Est. & Rect. Subm. data	ELIA	Submeter requirements	- Moreover, submeter requirements (incl. precision, accuracy, communication) and rules for data quality and treatment (validation, estimation, rectification, cf. section 6.2.2) should also apply for flexibility purposes (cf. section 7.1). Therefore, ELIA urges for alignment between SOs for the setting of these submeter requirements. Are these standard specifications the same as those applied to the main meters?	We agree that alignment between the submeter requirements for different applications is desirable, but still there may be difference for flexibility, e.g. where second data is required instead of 15' data for supply market. The standard specifications may not be the same as for the head meter as the functionality will also be different (e.g. no breaker, ...)	No
29	Section 7.2.1. - Access to meter Data	ELIA	Access to meter data	"Furthermore it is stated that *"Unless legally imposed, the DSO only provides third party access to data of (fully) regulated (main or sub) meters, as these are the only meters for which the DSO is the primary data source. For semi-regulated submeter data, the third party providing the data is the primary data source and should manage the access to the data. "* Hence, Elia assumes that semi-regulated meters will be organized in the same way as OEM or other 3rd party data providers."	This should be looked at in more detail. The principle we propose here is that data access should be managed by the primary data source, not subsequent users of the data.	No
30	Section 7.2.1. - Access to meter	ELIA	Access to meter data	Finally, is it the intention that the DSO systems communicate with the 3rd party submeters directly or should the data be put at disposal of the DSO by the 3rd party backend system?	Both options may be considered, although the latter seems more apt to supporting different types of semi-regulated submeters.	No
31	Section 6.2.4.3. - Commodity Volume after Energy Sharing	ELIA	Local correction for virtual injection volume calculation	- The local correct mechanism applied in the calculation of virtual injection onto the PMHP allows to isolate the assignable volumes for a separate supplier. ELIA welcomes this local correction on philosophy as it aligns with the philosophy of decentralized exchange of energy blocks between consumers and many other parties, on and behind the meter. - As grid users may participate to supply split in combination with flexibility and/or energy sharing, ELIA would like to understand how DSOs see the combinability of these services with respect to structuring, metering, volume calculation, grid fee billing and settlement. ELIA is willing to actively contribute to this debate in order to apply uniform conditions across regions and voltage levels.	In a high-level way, this is already described in the vision paper. For energy sharing, we propose to allow energy sharing at the level of the contract (as an alternative to buying the energy from a supplier). In this way, the impact is decoupled from the multiple supply contract complexity, as the current logic of energy sharing can just be applied to each additional MHP. For flexibility, there is even more decoupling as an SDP flex does not necessarily coincide with an SDP supply. In that case, both are full separate (except for ToE)	No
32	General	FEBEG	Implementation	The more concrete proposals and the further implementation of the vision will still require some time and should also be done in an open and transparent manner, considering the feedback and concerns of the market parties: • The implementation of all these new principles will have a huge impact on all domains (Metering, Structuring, Settlement, Reporting, IT,…). • The implementation in MIG6 will be far from easy and will require a lot of effort from all involved stakeholders (DSOs, suppliers, …) • Inevitable, the complexity will only increase for all actors, customers included. • Some of the required changes imply changes in the legislation in the 3 regions (this will take some time). In addition, it is clear that we should avoid any change of the model for only one region at the time. • Overall, the implementation will be a big challenge for the experts in all of the domains. It will not be a sprint, but more like a marathon. FEBEG asks that an implementation planning is made with clear priorities. We must implement these changes taking into account realistic implementation times for all involved parties.	We fully subscribe to this comment. An implementation planning with clear priorities is the next step after we receive feedback on the regulators and other competent authorities on the proposed vision.	No
33	General	FEBEG	Fundamental points	For FEBEG, the absolute priority must be to build and to implement a correct and sustainable operational system enabling suppliers to correctly execute their job regarding 5 fundamental points: a. Level playing field: each commercial actor active on a same point must compete for the customer only on the basis of its own costs and own risks. Each actor must bear its own obligations, prohibiting any transfer of risks of obligations from one actor to other actors. In this context, it is essential that all non-commodity related costs (grid fee, levies, taxes, quotas) are spread among all market operators in a proportional way to its activity on an access point. b. Harmonized approach: FEBEG asks consistency avoiding handling multiple models in Belgium and the subsequent market fragmentation. c. Metering (net): the net metered volume must be calculated and transmitted by the DSO to each supplier implied, and this exclusively via the operational systems and informatic flows. d. Allocation process: a solution must be developed and implemented for a correct allocation process to the suppliers implied. This allocation process must be based on the net volumes. e. Forecast: models for the forecasting must be adapted between DSO and suppliers enabling suppliers to have correct and sufficient information to forecast its allocations.	We believe our vision fulfils these requirements. As it was developed jointly by all DSOs, it supports the harmonized approach that is requested.	No
34	General	FEBEG	Consumer needs and priorities	While we are relatively positive about the vision paper which clarifies how the future model can work and how everything can be arranged to offer new and more complex services to the customer, we ask to also not ignore the current consumer needs and priorities. For FEBEG, it is important to ask ourselves some questions from the consumer perspective, what is he really asking for? What are the potential benefits? How will it impact/improve the consumer experience? We need to compare these use-cases with more simple Home Energy Management Systems which do not require complex market model changes nor additional (semi-regulated) digital/smart meters. As mentioned before by FEBEG, a stepwise and cost efficient implementation and a realistic roadmap (taking into account technological evolutions) to reach the objectives are needed.	We interpret this feedback as a plea not to ignore alternative (behind the meter) solutions to a supply split in the market. Customers are obviously free to pursue such solutions. Where this appears to become the de facto standard, it will decrease the priority of the solutions that we propose.	No
35	Management summary	FEBEG	Grid fee split	The vision paper mentions that "*Assuming that a compensation for unpaid grid fees towards the primary supplier would not be regarded as an exogenous cost by the regulators, the total grid fee will be divided between and collected by all suppliers that are active on the Access Point according to a standard (still to be defined) algorithm. "* 'FEBEG thanks Synergrid to officially foresee a split of the grid fee between all active suppliers on the access point. In order to guarantee a level playing field, it is important that each actor on the access point supports its own costs, including the invoicing of non-commodity related costs like grid fees. In such a context of fair split per supply contract, Febeg remains in favour of the cascade principle. Indeed, it would be unfair if the entire grid fee needs to be collected by the primary supplier. In such mechanism, the main/residual supplier is still responsible for the invoicing of grid fee for other actors active on the point, what for FEBEG is unfair: • Must the residual/main supplier be responsible for the invoicing of peak grid costs linked to another supplier? • Must the residual/main supplier be responsible for the invoicing of all grid fees even if the volume supplied is substantially lower than the volume supplied by a secondary supplier (eg. EV volume)? Also, to ensure that the consumer has a good readability and comprehension of the cost per contract, and more globally for transparency reason, FEBEG is of the opinion that each actor must also invoice its own non-commodity related costs. So for FEBEG, the solution of "grid fee split" is the only one solution, regardless the fact that the cost of compensation of unpaid gridfee could be considered as exogeneous.	We thank Febeg for this clear position. If the grid fee split is indeed confirmed to be the requested solution, the proposed vision does not preclude it.	No
36	Target use case	FEBEG	More complex / Non-residential use cases	The vision paper mentions that "*Even though the vision is developed on and explained by this concrete use case, this does not prevent it from being more broadly applicable to other more complex use cases and to non-residential cases with Access Points connected to the Medium Voltage network ".* FEBEG appreciates this clarification, indeed, as it is important that the principles which are outlined in the vision document can also be applied to more complex cases in the future, such as a network of small business with a large PV parc, multiple charging points, etc… This was also underlined by other parties during the PDG sessions and is clearly an important element to consider in further future developments. In the longer run, FEBEG is of opinion that use cases with the "'choice of optimisation" based on the free choices and own characteristic of each consumer, must be the final objective to achieve and to implement.	We take note of this position.	No

#	Ref. Vision Paper	Author	Topic	Comment	Reaction	Change in paper
37	Customer installation	FEBEG	Reference to AMR	Regarding the target use case, the vision mentions that "*It consists of a main meter connected to the distribution grid. This can be a digital meter or an Automatic Meter Reading device (AMR).* " FEBEG is surprised to still use the notion of "AMR", what are the technical capabilities of such meter in comparison with a smart merer. WE would urge to strive for such use cases (as the target model) to only be implemented in combination with a smart meter as provided by the DSOs for the metering of the head Point. We find the mentioning of AMR confusing in this sense.	We believe there is a misunderstanding on this point. The supply split requires 15' data to be available to make the necessary computations. For LV customers these can be provided by a digital meter in SMR3. MV customers and LV customers >56 kVA, however, have an AMR that also provides 15' data. Therefore, we mention both options, as the vision is applicable both to LV and	No
38	Customer installation	FEBEG	Additional separate metering	On the same page we read "*The base load, PV production and battery are not measured separately* ". We understand that, as a consequence, the consumer will not know for the PV and the battery what the flows are, and therefore, on the sub-meter point for EV, heat pump, he will not know where the electron went. If, in this case, the EV is owned by and supplied via a leasing company contract, the consumer nor the leasing company will know what electricity (PV, battery or "other) was used to charge the car. This could lead to uncertainties and confusing regarding the electricity price charged for the car. From the discussions in the PDG working group we understand that a separate metering for a battery is however possible in the model, even if not mentioned explicitly in the "target use case" presented in the paper. Additional meters could indeed help in providing more info to the consumer/leasing company to address the above concern if deemed useful. Today there are already a lot of charging points installed at residential level, these have a status of 'public charging'. This means that the costumer/EV owner can charge at a friend's place over the weekend or even via a double socket for a family with 2 EVs, reimbursed by two leasing companies for people working at different companies. The note is explaining in detail the	We will clarify that the base load, production and battery are unmeasured in the example, but that this is not a limitation of the model. The 'public charging' use case may indeed exist today. However, it is not an example of a supply split (or at least not of a supply split facilitated by the DSO), hence we do not treat it in the paper. In fact, it may be regarded as a mobility case, which we have marked as 'for further study', precisely to avoid proposing complex solution for which market solutions already exist today.	Yes
39	Customer installation	FEBEG	Serial and parallel meters	FEBEG considers the proposed approach as logical and indeed a good solution to treat the 2 use-cases (parallel and serial). However, we wish to clarify that the intention to "*logically treat both configurations as a serial configuration, by computing a virtual main meter for the parallel configuration that sums, for each 15' interval, the offtake and injection measured by each main meter* " is not the current standard approach. Indeed a change in the current approach would be required.	We take note of this position.	No
40	Customer installation	FEBEG	Submetering	The Vision mentions that "*Even though we will refrain from building in architectural limits to the number of submeters, we therefore argue in favor of limiting, in a start-up phase, the number of separately commercialized appliances (and hence the number of submeters) to a maximum of 6 or any lower limit defined in regional legislation.* " FEBEG agrees that a certain limit should be used in the beginning to avoid extremely complex cases. For FEBEG a limit of 3 or exceptionally 4 would be preferable as this is already a significant increase in complexity compared to the current situation.	We take note of this position. On this specific aspect, we may differentiate between what is configured in the system and what we recommend towards the market.	No
41	Customer	FEBEG	Roles and	This chapter is still relatively vaguely described, but overall contains not stringent issues for FEBEG as such.	OK	No
42	Supply market model	FEBEG	Concepts	FEBEG understands from the proposal that there will be extra headpoints for the physical submeters but they will have each a separate headpoint EAN for that specific submeter. Consequently, suppliers will receive the necessary metering /volume data related to that new EAN headpoint. We are positive about such a model which works with separate EAN headpoints.	We take note of this position. The vision indeed aims at integrating the supply split in the current market systems.	No
43	Supply market model	FEBEG	Metering	The vision mentions that "*All calculated meter computations are performed on 15 minute data. In order to ensure this, and to use precise data in market processes, we propose that each SDP behind an Access Point with multiple MHP be configured for SMR3 (the measured load curve is used in the market processes). The process starts by converting the measured index from each submeter into a 15' volume.* " FEBEG does not question this, but we do understand that such solution is only possible in combination with a smart meter, we refer to our previous comments on the AMR meter which seem not compatible, to our understanding, with the above. In addition, we like to clarify that this will have a huge impact on the IT systems of the suppliers which will have to be able to process a much larger amount of data. Regarding the use-case of an EV with charging infrastructure. This currently contains a MID certified meter, does Synergrid assume (or not?) that such a meter can be used? Or, alternatively,	The terminology is indeed too specific to cover also the AMR case. We will generalize the description in the document. We believe the metering requirements should be determined by regulation (insofar as they determine the accuracy of the volumes used in the market). The exact role of and process within Synergrid are still to de determined.	Yes
44	Supply market model	FEBEG	Structuring	Regarding the 'end of the contract' in case of a consumer changing address. It is to FEBEG not fully clear when customer moves if they can ask for a different optimization of his home vs previous owner ? In addition, we are wondering, when a customer moves, today, he has the possibility to also move his charging cable/installation and remove this from the premises and reinstall this in his new home. In such a case, what happens to the (semi regulated) meter? Is this meter "attached to the house" or does he bring along the additional meter?	We believe that each (main) grid user can independently decide whether or not he wants to allow multiple supply contracts. Therefore, a new owner should be able to 'unregister' the submeter and delete the associated MHP, which will result in merging the volume with the primary contract. The previous owner that moves his charging installation will need to register the submeter again at the new address, after which an additional MHP can be created and a separate contract can be installed.	No
45	Supply market model	FEBEG	Settlement	It is stated that the choice between OGCV (optimized gross consumption volume) and GCV (gross consumption volume) may impact the obligations based on the reported allocation volume. We would like to stress that legislation determines the obligation and not the reported allocation volume. In case of exemptions or differences per region, the reporting will need to be adjusted so that market parties can fulfill their obligations in line with the legal requirements. Section 6.4.2 mentions "*In case the SDP participates in energy sharing or peer-to-peer selling, an additional CVaES may be communicated.* " For Febeg, it is premature to mention an additional CVaES, see our feedback in next section.	It is clear that each region will need to comply with its own legislation. Nevertheless, we propose the alignment of the reported volumes with the allocated volumes as part of the vision. Regaring the CVaES, the tekst says 'may' and obviously any solution will also in this case need to comply with all applicable regulation.	No
47	Supply market model	FEBEG	Energy sharing	FEBEG is surprised to see a specific chapter on energy sharing as we consider that the initiated concertation process on this specific topic through the PDG "energy sharing" has not been finalized and the discussions aren't sufficiently mature to conclude; FEBEG pleads not to introduce this topic in the current vision paper but to deal with this topic in a specific vision paper dedicated to energy sharing. As a general principle, we repeat our vision that Energy sharing must be treated as much as possible in the same way as a separate supply contract in terms of level playing field, harmonized approach and very important net volumes in the metering and allocation process (see above). In the context of multiple supply contracts, customers have signed different contracts in order to have the best conditions per appliance in function of their needs. Spreading the shared volume over those different contracts will likely deteriorate the potential benefit as all actors will take the risks and costs of energy sharing into account. Therefore, we propose to execute a cost-benefit analysis before introducing such complexity into the market processes for customers with multiple supply contracts.	The chapter is deliberately kept short in view of the work that is done in the Product Design Group Energy Sharing. However, the integration of the multiple contract model with energy sharing is a mandatory part of the vision paper that needs to be submitted to the VREG. The integration part, and the suggestion to limit energy sharing to one instance per supply contract, doesn't preclude any of the proposals that are curently being discussed in the PDG Energy Sharing.	No

#	Ref. Vision Paper	Author	Topic	Comment	Reaction	Change in paper
48	Supply market model	FEBEG	Flexibility	Similarly to the chapter on Energy Sharing, FEBEG considers this topic not sufficiently mature to discuss or evaluate in detail this use-case. However, we wish to already underline and clarify some issues we see with the solutions proposed by Synergrid. First and foremost, FEBEG asks to ensure consistency: same volumes (GCV,...) should be used in all processes, in all regions, etc. We cannot handle multiple models in Belgium, certainly not if the number of households/PMEs that will make use of these new possibilities, a number that will increase a lot in the future. As a high-level principle, which has been mentioned before by FEBEG previously in this context but also in discussions with the TSO, it is very important for FEBEG that under no circumstances the costs or burdens (for the activation of flexibility) are transferred to the electricity supplier. Indeed, the Flexibility Provider (active on the SDP-F) should take this into account in his costs and portfolio. Regarding the 4 options put forward by Synergrid, FEBEG is mostly concerned about the last one. In option 4 there is no link between SDP-F on the head-meter and the SDP-S on the sub-meters. We do not see how such a combination would be feasible in practice and still be in line with some basic/important principles for FEBEG. For example, it is not possible to correctly assign the flexibility to an asset (house, battery, EV or heat pump) in this option. The solution proposed by Synergrid is an algorithm, but this is very arbitrary and thus by definition uncorrect. We are very worried that this solution will result in unfair allocations and distorted incentives. We are convinced that a model based on the real metered data and not on arbitrary algorithms is needed. In addition, the Vision mentions the use of the ToE model. We like to state clearly that FEBEG considers the currently implemented solution for ToE to be very burdensome. We askto improve and simplify the model soon. Indeed, we are not in favor of solutions that would be based on the current ToE model. However, FEBEG understands that Elia is working on a more simplified version of the ToE model which would reduce the current complexity while also removing the burdens for the suppliers. Therefore, we urge SYNERGRID to align with Elia to ensure that any	We take note of this position. However, option 4 is a very probable case, e.g. where the DSO is the Flexibility Requesting Party for a congestion service and the Access Point has multiple contracts. We are currently analyzing alternatives to the ToE model with Elia.	No
49	Supply market model	FEBEG	Data access	FEBEG wishes to recall the current regulatory framework: • The DSO is "Controller" regarding the 15' data on the head meter (P4). • The DSO can decide to give 3rd parties access to this data in case there is a valid / important reason to do so (for example, to suppliers in order to receive correct billing). • For this type of transaction, no explicit approval is needed from the consumer. However, the situation is different for other forms of data: • The consumer is responsible when it comes to more detailed data (P1 – 4"). • However, consent is not always (strictly) required, a market party can sign a contract with the consumer in order to use the consumers flexibility (based on P1 data). In such a case, the consumer can give the OK to the DSO to give access to this data to another market party. Based on the signed contract, the market party can use (process) the data. Related to the vision note, FEBEG considers that (under the current regulatory framework) the above principles apply also to sub-meters: • Regarding the 15' data, the DSO is controller. • Regarding the more detailed data (P1 / seconds) the consumer can give a "controller" function to a market party based on a signed contract and prior to consent from the consumer.	The situation may be different for a submeter from a third party (even for the 15' data). The current regulatory framework needs to be revised for this.	No