



PDG Flexibility 16/05/2025 – Feedback ToE design note & document release 3 - Meeting Minutes

List of attendees

Market parties

Last name	First name	Organisation
Adigbli	Patrick	Centrica
Agudelo Saavedra	Valentina	Energy Pool
Barbieux	Sébastien	Axpo
Celis	Chris	Febeg
Claur	Fredi	Bamboo Energy
Corradi	Jennifer	Energy Pool
Craps	Thomas	Trilations
Deblocq	Vincent	Febeg
Degbomont	Jean-Paul	2valorise
Dubois	Pierre	Totalenergies
Fontaine	Valentin	Infrabel
Francotte	Julie	Engie
Fu	Chun	Centrica
Gorlé	Sophie	Arcade
Gresse	Pierre-Henri	Flexide Energy
Jacquet	Annabelle	Totalenergies
Joye	Robbert	Next Kraftwerke
Julien	Louis-Philippe	Luminus
Kluft	Gauthier	Thermovault
Laleman	Ruben	Engie
Lambert	Adrien	2valorise
Limpens	Tanguy	Axpo
Marchal	Fabienne	Clef
Mashlakov	Aleksei	Centrica
Masschelin	Matthias	Bnewable
Meynckens	Geert	Centrica
Mouton	Victor	Accenture
Navas Mimiaga	Monica	Axpo
Neiryndck	Jérôme	Dats24
Neiryndck	Vladimir	Eneco
Soenen	Stefan	Elindus
Somers	Wim	Ecopower

Tytgat	Hendrik	Eneco
Van Bossuyt	Michael	Febeliec
van der Elst	Augustin	Next Kraftwerke
Vannoppen	Bart	Volta
Verhegghe	Karen	Luminus
Vermeulen	Paul-Erik	RWE
Willems	Lieven	ODE

Regulators

Last name	First name	Organisation
Collado	Thierry	CWaPE
Cousein	Cyril	Vlaamse Nutsregulator
Debrigode	Patricia	CREG
Flechet	Renaud	CWaPE
Haaker	Nick	Brugel
Langie	Mieke	Vlaamse Nutsregulator
Marchand	Stéphane	CWape
Michiels	Marc	Vlaamse Nutsregulator
Waucomont	Mathieu	CWaPE

System operators

Last name	First name	Organisation
Adam	Louise	Synergrid
Blontrock	Bruno	Synergrid
Buelens	Roeland	Fluvius
Castadot	Raphaël	Ores
Chobanov	Kristian	Fluvius
Debray	Arnaud	Elia
Delphine	Dessart	Resa
Dewever	Philippe	Fluvius/Synergrid
Glorieux	Jacques	Synergrid
Loos	Rob	Elia
Macé	Odile	Sibelga
Milis	Kevin	Synergrid
Saxe	Kevin	Elia
Serrarens	Simon	Elia
Verbiese	Michaël	Atrias
Vervloesem	Lode	Fluvius

Meeting Minutes

The Product Design Group was supported by a slide deck, which can be found on the webpage of the PDG¹. These meeting minutes capture the interactions between the participants.

Feedback on the consultation of the ToE design note

The first part of the PDG was dedicated to providing the market parties with an overview of the feedback Synergrid received during the consultation of the ToE design note, and outlining how this received feedback impacts the plans of the system operators.

A first point of discussion concerned itself with the upcoming case paper about the corrected model on DSO points, and more specifically how MV and LV would be treated, as various market parties (including suppliers, FSP's, Febeliec and Arcade) indicated that MV and LV clients are clearly different kinds of clients with different needs, and given the clear flexibility volumes waiting to be unlocked on MV, priority should be given to unlocking the MV segment, meaning that the solutions for MV should not have to wait until all the details for LV have been hashed out. The system operators agree, and specify that a phased approach will most likely be used, where both the timing and (certain aspects of) the solution might differ between LV and MV, and that all options are still open at this point, with the case paper aimed precisely to more deeply understand these issues.

Bnewable also raised the point that supply split, a key solution pillar to their mind, is nowhere to be seen in the proposed roll-out plan. The system operators agree on the need for supply split, but note that this topic is out of scope for this product design group on explicit flexibility, as the system operators see supply split primarily as a tool to further enable implicit flexibility. The system operators however also grant that supply split might have some applications for explicit flexibility, and therefore also wish to clarify that currently there are already options for supply split: contract split, where a market party splits the volume of the DSO headmeter across multiple submeters without intervention of the DSO, is already possible, as well as a supply split using a second DSO-meter. What is currently not possible, is any kind of supply split using third-party meters, as the legal framework for the use of such third party meters is currently non-existent. As such, the system operators indicate that a change in the legal framework is needed before further steps can be taken when it comes to supply split with third party submeters.

Another remark from Bnewable is that they are somewhat disappointed with how seemingly little the system operators are taking the feedback on the design note, being the unanimous disapproval for the CSM into account. In response, the system operators point out that, as shown by the slides, the received feedback from the market parties was more varied, with the main points being the urgency to have a ToE model on all voltage levels, a preference to have the CM available on all voltage levels (with priority given to HV/MV) and to allow the different models to co-exist. The system operators further clarify that the currently presented approach aims to address the issues highlighted in the reactions: CSM can be implemented more quickly than the CM, so rolling out CSM across all voltage levels is a no regret option addressing the first point of feedback. After the feedback received from the market, higher priority is also given to the possible implementation of the CM on DSO connected points, with a case paper investigating this foreseen for the end of 2025. In relation to the last main point of market feedback, once the

¹ <https://www.synergrid.be/nl/marktoverleg/pdg-flexibiliteit> or <https://www.synergrid.be/fr/concertationdu-marche/pdg-flexibilite>

CSM is implemented and available on all voltage levels, this will serve as an alternative to the existing Opt-out and Pass-through regimes. In addition the CM will be made available on HV, providing even more options on that voltage level.

Document release 3

The second part of the PDG was dedicated to discussing the high-level changes contained in document release 3 as well as showing the consultation timeline to the market parties.

Febeliec expressed their hope that the current proposal would not be too little, too late and furthermore heavily stressed that Febeliec is of the opinion that the regulators have a crucial role to play in this topic, in that they need to treat this with a fitting sense of urgency and should do whatever is needed to ensure that the resulting solution is a uniform one, across all regions. Synergrid indicates that a first round of meetings, consisting of both bilateral meetings between system operator and relevant regulators as well as a meeting between Synergrid and Forbeg have already taken place. However, the consultation process needs to be followed, as the regulators will only take their decision once they have had a chance to review the feedback given by the various market parties.

Bnewable wonders where the question of baselining will be tackled, as they find that the current methods are somewhat inadequate. The system operators respond that for LV points, this question will be an important part of the case paper on CM, as there is a clear need to move from synthetic profiles to decent baselines. The baselining methodology should be aligned across flexibility products and should also yield correct results without being too complex. For MV and HV, Elia also indicates that the baselining methodologies used there will be revised.

Towards the end of the meeting, most market actors once again stress the need for both supply split and the roll-out of the CM on MV, as there is a large potential present on MV, so solutions are needed to unlock this flexibility. In closing, the system operators thank all present for the interactions and their insights.