

Document release 3

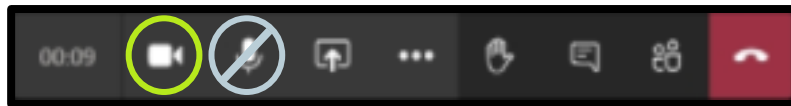


Hybrid meeting rules



Please keep your camera on (to the extent possible)

Please turn off the microphone when you do not want to intervene



No AI-agents or participants

Questions:

- Post your questions in the chat (with slide number if applicable)
- Interactions are foreseen

Content

1. Consultation ToE design note
2. Feedback consultation ToE design note
3. Doc rel 3: high level changes
4. Doc rel 3: consultation practicalities
5. Q&A



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Goals ToE Design Note

- 1 Vision of Synergrid Members on Transfer of Energy for explicit balancing products on different voltage levels
- 2 Propose design for ToE, including rational and possible future improvements
- 3 Propose indicative timeline for roll-out ToE
- 4 Get feedback from market to integrate in documents under consultation in Q2 2025 (a.o. ToE Rules & Doc Release 3)

Proposed solution

CSM (Central Settlement Model)

Default model, to be gradually extended to all voltage levels and balancing products

CM (Corrected Model)

Alternative for Grid Users connected to Elia grid

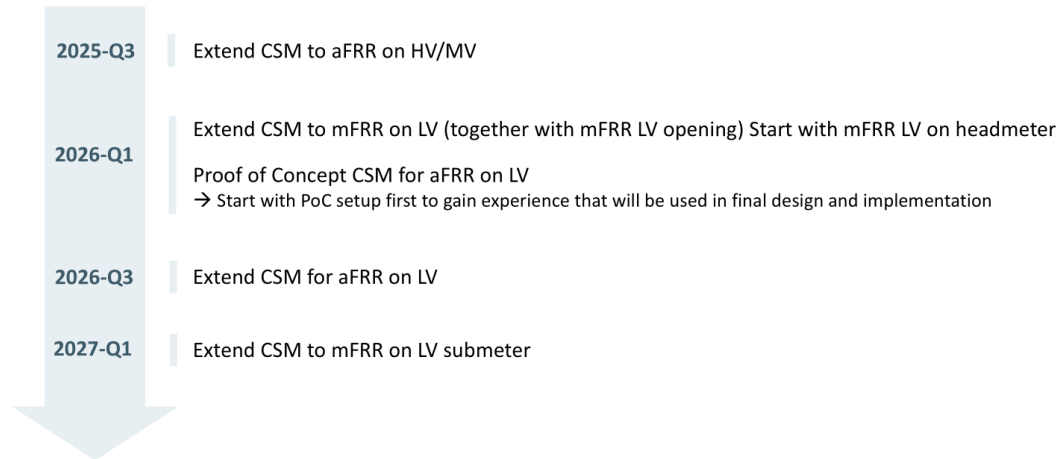
Opt-out and Pass-through models

Remain available as alternatives

A **step-by-step approach** will be followed, where each step is conditional on an evaluation, and the timing is indicative due to external factors such as the need for regulatory approvals

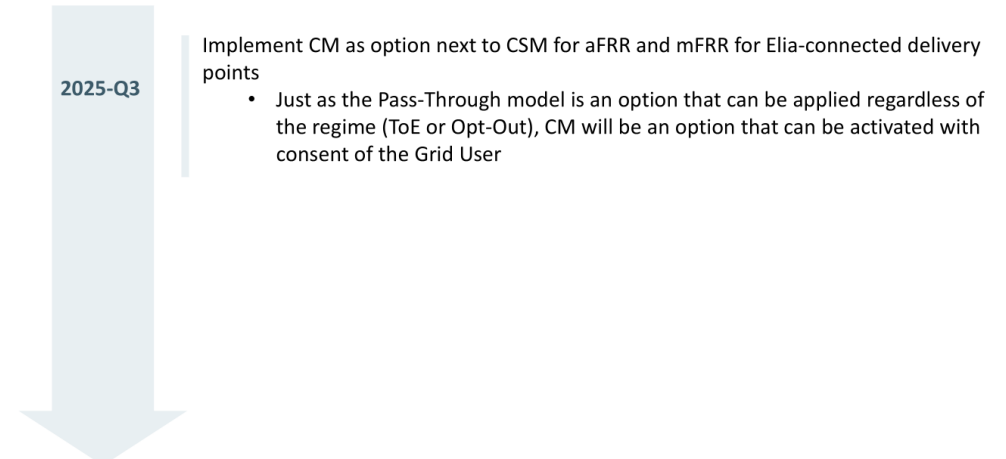
Indicative Timeline

Gradual implementation steps for CSM (indicative timing)



Disclaimer: each step is conditional on an evaluation and the timing is indicative due to external factors such as the need for regulatory approvals

Initial implementation CM (indicative timing)



Disclaimer: each step is conditional on an evaluation and the timing is indicative due to external factors such as the need for regulatory approvals



Evaluation in 2027

Impact of the developments + Evolution of market (a.o. ToE, Supply Split)



If a **further need to unlock flexibility** is identified, Synergrid will analyse additional, potential improvements such as:

CM for non-Elia connected delivery points

ToE DA/ID LV

Implicit Flexibility

...

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Feedback consultation ToE design note (1/4)

9 Responding parties

- ✓ Suppliers
- ✓ FSP's
- ✓ BRP's
- ✓ Federations



Side note: few customers

Extra clarifications were asked where needed

Feedback consultation ToE design note (2/4)

Urgency ToE

Need and **urgency of ToE-model** on all Voltage Levels supported by everyone
Imposed Opt-Out on aFRR is blocking factor due to length & complexity of negotiations (which is due to lack of alternative models)

CM

- Preference for **CM on all voltage levels** (with MV and HV as priority)
- For FSP loss of Customer confidentiality (risk for competition) with CM does not outweigh issues with Opt-Out/CSM (already information shared by FSP to supplier in as is process)
 - No clear preference between **correction at invoice or correction at source**

Feedback consultation ToE design note (3/4)

CSM

Remarks on **CSM**:

- Doubts on legality of (aspects of) CSM (vs European directive)
- Price formula used in CSM not acceptable (because never 100% compensating, creating impact on bidding behaviour/liquidity/Value of Flex)
- Length of negotiation period under CSM: too long

Coexistence

Allow CSM, CM, Opt-Out & Pass-Through to **coexist**: FSP will choose model to propose to customer

Forecasting

Impact of flex on forecasting & provisional allocation

→ Market parties request more information to enable better forecasts & avoid false conclusions due to flex activations

Feedback consultation ToE design note (4/4)

Simplifications

Approval of simplifications

- No combination of flex (with ToE) and energy sharing
- No rectification
- Don't take the rebound in account

MID-compliance

Relaxation of MID-compliance

- Obligation of MID-compliant submeters in case of ToE is seen as burden
- Obligation comes from European law when metered values are used in economic value chain

Impact on Design note

Generally **approval of the Design Note ToE**, but most actors urge the SOs to

- Open ToE-model on all Voltage Levels
- Foresee CM as alternative on short notice

Next steps

Start consultation Doc Rel 3 & ToE rules with

- Gradual introduction CSM on all Voltage Levels as “no regret” with attention for simplifications of process (in specific for LV) and ambitioned go-lives Q4 2025 (HV/MV aFRR) and Q1 2026 (LV aFRR/mFRR with ToE)
- CM on Elia connected points
- Without CM on DSO-connected points

Redaction (+ consultation) Case Paper “*CM on DSO-connected points*” in 2025

- E2E-process
- Pro/con analysis
- Impact analysis (on customer, on existing processes,...)
- Context analysis (positioning with other evolutions e.g. supply split...)

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Overview document release 3

Main changes

- ✓ ToE
- ✓ mFRR opening of LV market
- ✓ CRM LV
- ✓ FCR process optimization
- ✓ Liability provisions in FSP-DSO contract



Comments made by regulators on document release 2 have been integrated



As a reminder: MID-compliance needed in case of ToE



End of transition period from central to local gateway extended until 31/12/2027*

*need for transition under discussion

ToE roll-out plan

Product	Grid	Model			
		ToE Central Settlement Model	ToE Corrected Model	Opt-out	Pass-Through
FCR		ToE Not Applicable			
mfRR	Transmission & local transport	✓ Since 2018	➔ Q3-2025	✓ Since 2018	✓ Since 2020
	HV-MV distribution	✓ Since 2018	TBD	✓ Since 2018	✓ Since 2020
	LV distribution (≤ 1 kV)	➔ head Q1-2026 ➔ sub Q1-2027	TBD	➔ head Q1-2026 ➔ sub Q1-2027	➔ head Q1-2026 ➔ sub Q1-2027
aFRR	Transmission & local transport	➔ Q3-2025	➔ Q3-2025	✓ Since 2021	✓ Since 2021
	HV-MV distribution	➔ Q3-2025	TBD	✓ Since 2021	✓ Since 2021
	LV distribution (≤ 1 kV)	➔ PoC Q1-2026 ➔ Q3-2026	TBD	✓ Since 05/2024	✓ Since 05/2024
DA/ID	Transmission & local transport	✓ Since 2021	TBD	✓ Since 2021	✓ Since 2021
	HV-MV distribution	✓ Since 2021	TBD	✓ Since 2021	✓ Since 2021
	LV distribution (≤ 1 kV)	TBD	TBD	TBD	TBD

ToE – general adaptations

Net Injection

Removal of exclusion of ToE for net injecting delivery points

Energy Sharing

No combinability between energy sharing and market situations with transfer of energy

Opt-out

Communication of aggregated opt-out volumes per market party

ToE roll-out plan: Corrected Model

Product	Grid	Model			
		ToE Central Settlement Model	ToE Corrected Model	Opt-out	Pass-Through
FCR		ToE Not Applicable			
mfRR	Transmission & local transport	✓ Since 2018	➔ End 2025	✓ Since 2018	✓ Since 2020
	HV-MV distribution	✓ Since 2018	TBD	✓ Since 2018	✓ Since 2020
	LV distribution (≤ 1 kV)	➔ head Q1-2026 ➔ sub Q1-2027	TBD	➔ head Q1-2026 ➔ sub Q1-2027	➔ head Q1-2026 ➔ sub Q1-2027
aFRR	Transmission & local transport	➔ End 2025	➔ End 2025	✓ Since 2021	✓ Since 2021
	HV-MV distribution	➔ End 2025	TBD	✓ Since 2021	✓ Since 2021
	LV distribution (≤ 1 kV)	➔ PoC Q1-2026 ➔ Q3-2026	TBD	✓ Since 05/2024	✓ Since 05/2024
DA/ID	Transmission & local transport	✓ Since 2021	TBD	✓ Since 2021	✓ Since 2021
	HV-MV distribution	✓ Since 2021	TBD	✓ Since 2021	✓ Since 2021
	LV distribution (≤ 1 kV)	TBD	TBD	TBD	TBD

ToE roll-out plan: Central Settlement Model

Product	Grid	Model			
		ToE Central Settlement Model	ToE Corrected Model	Opt-out	Pass-Through
FCR		ToE Not Applicable			
mfRR	Transmission & local transport	✓ Since 2018	➔ End 2025	✓ Since 2018	✓ Since 2020
	HV-MV distribution	✓ Since 2018	TBD	✓ Since 2018	✓ Since 2020
	LV distribution (≤ 1 kV)	➔ head Q1-2026 ➔ sub Q1-2027	TBD	➔ head Q1-2026 ➔ sub Q1-2027	➔ head Q1-2026 ➔ sub Q1-2027
aFRR	Transmission & local transport	➔ End 2025	➔ End 2025	✓ Since 2021	✓ Since 2021
	HV-MV distribution	➔ End 2025	TBD	✓ Since 2021	✓ Since 2021
	LV distribution (≤ 1 kV)	➔ PoC Q1-2026 ➔ Q3-2026	TBD	✓ Since 05/2024	✓ Since 05/2024
DA/ID	Transmission & local transport	✓ Since 2021	TBD	✓ Since 2021	✓ Since 2021
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	LV distribution (≤ 1 kV)	TBD	TBD	TBD	TBD

Central Settlement & Corrected Model

Model Registration

Register proof of agreement between market parties (ToE/opt out) (or CREG decision to use the default price) in Elia systems

Reuse of existing processes and communication

- SO's will verify if contract is registered
- Communication of ToE volumes via existing sFTP
- Market parties will receive ToE volumes per Regime
- ToE volumes are sent either aggregated (CSM) or for individual DPs (CM)
- BRP perimeter correction done by Elia

Opening of mFRR market for LV

Product	Grid	Model			
		ToE Central Settlement Model	ToE Corrected Model	Opt-out	Pass-Through
FCR		ToE Not Applicable			
mFRR	Transmission & local transport	✓ Since 2018	➔ End 2025	✓ Since 2018	✓ Since 2020
	HV-MV distribution	✓ Since 2018	TBD	✓ Since 2018	✓ Since 2020
	LV distribution (≤ 1 kV)	➔ head Q1-2026 ➔ sub Q1-2027	TBD	➔ head Q1-2026 ➔ sub Q1-2027	➔ head Q1-2026 ➔ sub Q1-2027
aFRR	Transmission & local transport	➔ End 2025	➔ End 2025	✓ Since 2021	✓ Since 2021
	HV-MV distribution	➔ End 2025	TBD	✓ Since 2021	✓ Since 2021
	LV distribution (≤ 1 kV)	➔ PoC Q1-2026 ➔ Q3-2026	TBD	✓ Since 05/2024	✓ Since 05/2024
DA/ID	Transmission & local transport	✓ Since 2021	TBD	✓ Since 2021	✓ Since 2021
	HV-MV distribution	✓ Since 2021	TBD	✓ Since 2021	✓ Since 2021
	LV distribution (≤ 1 kV)	TBD	TBD	TBD	TBD

Opening of mFRR market for LV

SDP-Flex

May only be located at the **main meter** of the installation

Similar onboarding process as for aFRR LV

- Requests via FlexHub Portal or API
- **No Contract Connection Check** required
- Net Flexibility Study: as stated in C8-01, **no restrictions** will be imposed **for LV by default**
- Possibility to onboard HeadPoint, DeliveryPoint and SDP-Flex via 1 request

Use of Delivery Point Groups for aggregation

- Creation of Delivery Point Group → Request to Elia
- FSP responsible for assigning SDP-Flex to Delivery Point Groups
- Delivery Point Group can be cross-DSO for mFRR LV

CRM LV

Alignment with latest version of the functioning rules

Extra fields during **onboarding** of a **LV delivery point**:

- Injection Only (true/false)
- Unsheddable margin

FCR process optimization

Overarching Goal

To harmonize the products and ease both understanding and implementation, align on aFRR requirements for:

- **Communication**
- **Metering and data requirements**

Communication

- **Communication channel:** all data will now have to be communicated **through the RTCP** (Tase2 will be abandoned in FCR)
- **Unification of the messages** (RTCP communication): existing **aFRR messages** were **extended to include FCR** data (with optional fields)

Metering and data requirements

- **Sampling rate** reduced from 2" to 4"
- **Requested data aligned on aFRR product**

Revision of liability provisions in FSP-DSO contract

Terms

Avoidance of unfair terms, serious fault cannot be excluded

Conformity with Civil Code

Conformity with new civil code: exclusion of:

- extra-contractual liability
- liability of natural persons

Liability regime

Integration of the liability regime of the agreement quality requirements

Switch off plan

No explicit mention of the energy scarcity switch-off plan as other triggers are also possible, like incompressibility

Liability limitations

Limitation of liability to **compensation** for **services rendered** rather than damage suffered

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Document release 3: Consultation practicalities

Consulted documents

- MG Flex
- C8/01
- C8/05
- C8/06
- C8/07
- FSP-DSO contract

Consultation Period

16/05/2025 - 27/06/2025

How to respond

- Consultation tool on consultation page Synergrid
- Email to marketconsultation@synergrid.be

ToE Rules

- The ToE Rules will be publicly consulted by Elia: 16/06/2025 – 13/07/2025
- This allows 2-week overlap period with public consultation Doc release 3

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List of abbreviations

Abbreviation	Meaning
aFRR	Automatic Frequency Restoration Reserve
BRP	Balance Responsible Party
CCC	Connection Contract Check
CM	Corrected Model
CSM	Central Settlement Model
DA	Day-Ahead
DP	Delivery Point
DSO	Distribution System Operator
E2E	End-to-End
FSP	Flexibility Service Provider
FTP	File Transfer Protocol

Abbreviation	Meaning
HV	High Voltage
ID	Intra-Day
LV	Low Voltage
mFRR	Manual Frequency Restoration Reserves
MID	Metering Instruments Directive
MV	Medium Voltage
SDP-Flex	Service Delivery Point Flex
sFTP	Secure File Transfer Protocol
SO	System Operator
ToE	Transfer of Energy
TSO	Transmission System Operator