



PDG Explicit Flexibility Document Release 4

25/09/2026

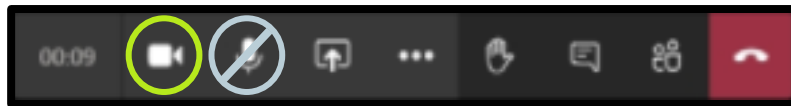


Hybrid meeting rules



Please keep your camera on (to the extent possible)

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



Questions:

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

Content

Introduction

Changes in DR4

What Else?

Conclusions & Next steps



Content

Introduction

- Flex... a shared ambition
- Overview DR4

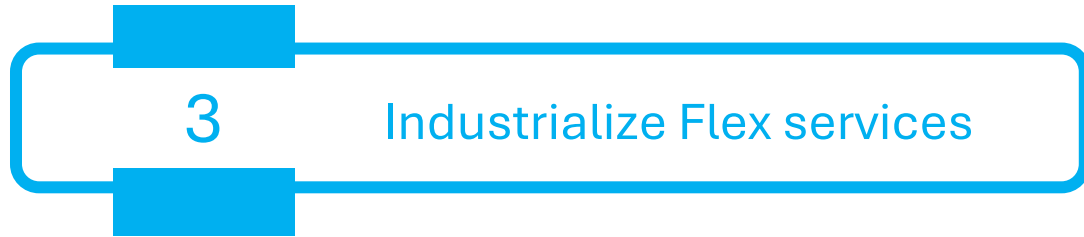
Changes in DR4

What Else?

Conclusions & Next steps



Flex... a shared ambition



Flex... a shared ambition

Document Release 2 (2023)

- Delivery Point Groups
- Unified Onboarding Request
- Relaxation meter requirement aFRR on LV

Document Release 1 (2023)

Open aFRR on LV

Modernisation Flexhub Part 1 (2026)

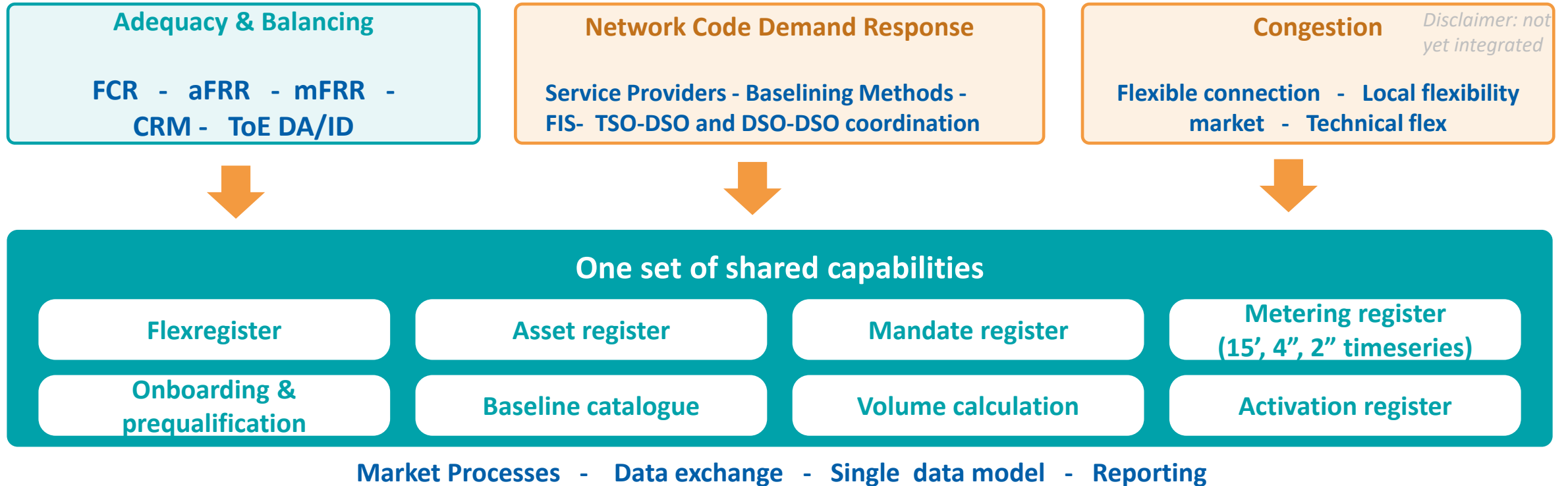
Document Release 4 (2026)

Document Release 3 (2025)

- Transfer of Energy
- Open mFRR on LV

FlexHub evolves towards Belgian FIS

Cross Region – Cross System Operator – Cross Product



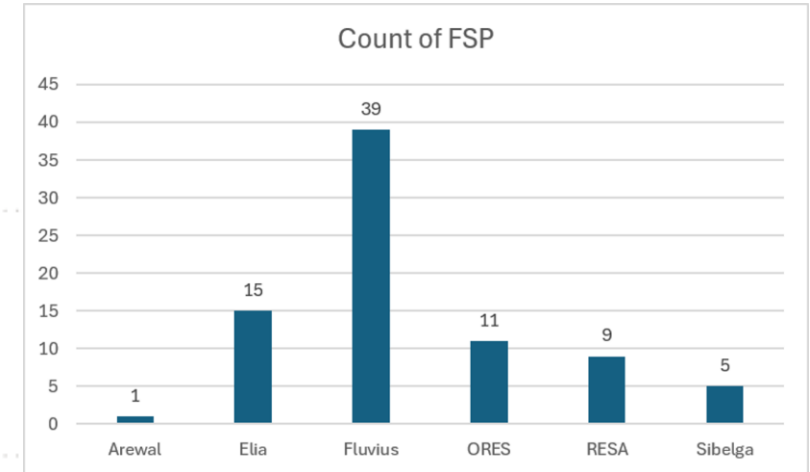
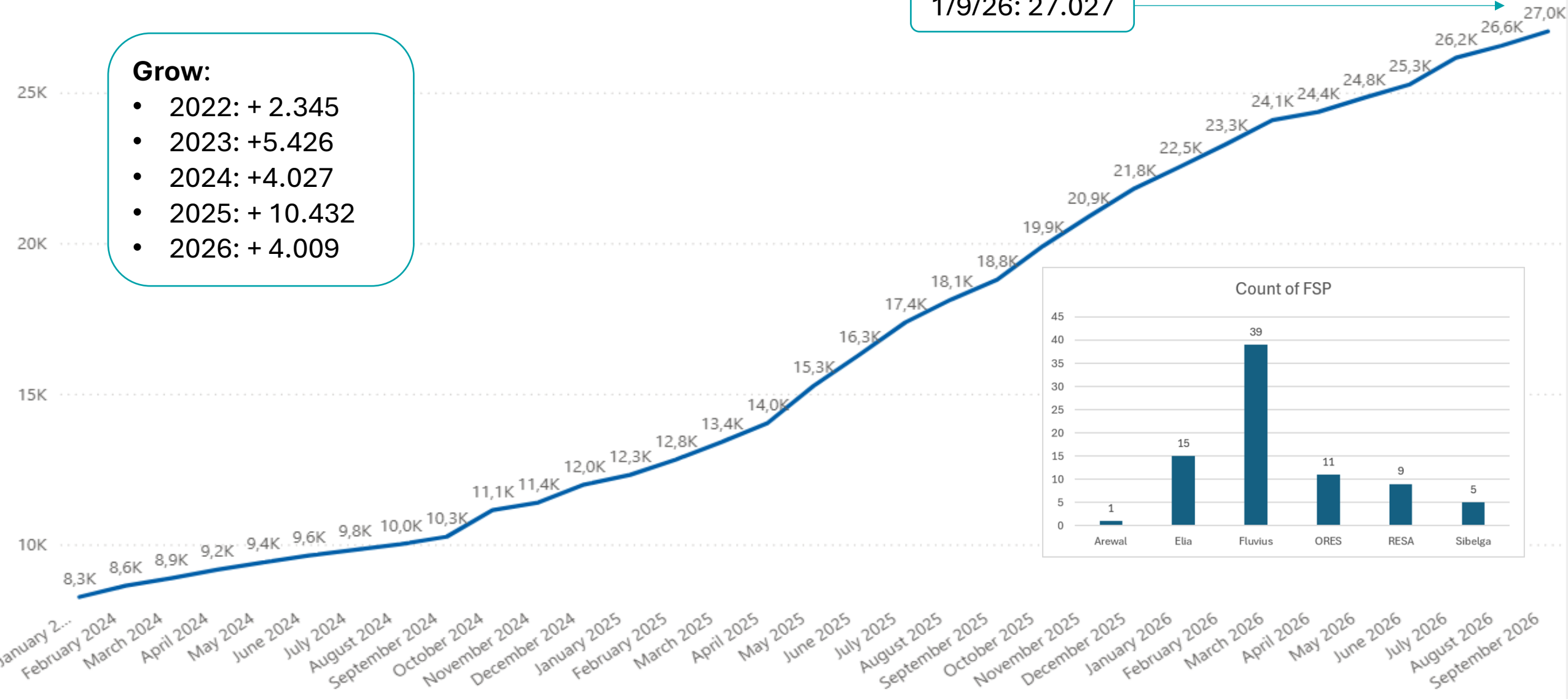
Belgium does not have to start a Flexibility Information System, it has to grow the one it already runs.

Growing market will require automatisisation

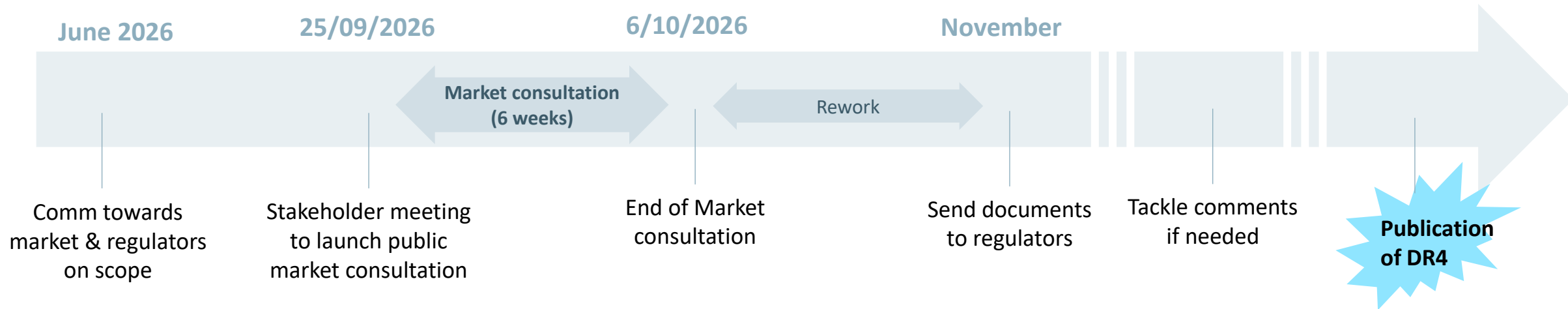
1/9/26: 27.027

Grow:

- 2022: + 2.345
- 2023: +5.426
- 2024: +4.027
- 2025: + 10.432
- 2026: + 4.009



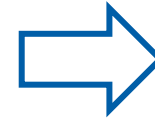
Steps and timeline for Document Release 4



Document Release 4 Objectives & Changes

Key objectives

- 1 **Simplify and streamline** the framework for explicit flexibility and deliver a more transparent, harmonised and scalable market model.
- 2 Prepare the market for **congestion management** and anticipate future **European developments**.
- 3 **Remove barriers** to flexibility



Main changes

- ✓ Access Contract Flexibility
- ✓ Mandate onboarding
- ✓ Product combination
- ✓ ToE DA/ID
- ✓ Activation register
- ✓ Central/local gateway

Overview Synergrid flexibility documents

Document	Official name (here in NL – also available in FR)	Main content	Link with DR4 topics
C8/01	<i>C8-01 – Network Flexibility Study voor de deelname van de DNG's aan flexibiliteitsdiensten</i>	Grid prequalification (NFS), qualification procedure, grid limitations	/
C8/05	<i>C8-05 – Gegevensuitwisselingen tussen Netbeheerders en Marktpartijen in het kader van de energioverdracht</i>	Data exchange & settlement for ToE (DA/ID, compensation, volumes)	Mainly ToE DA/ID evolutions
C8/06	<i>C8/06 – Algemene technische vereisten meetsysteem en gateway voor een FCR of aFRR-dienstleveringspunt aangesloten op het distributienet</i>	Technical requirements for metering & real-time communication (gateways, RTCP)	Mainly Central vs local gateway
Market Guide Flex	<i>Marktgids Flexibiliteit v3.0</i>	End-to-end market processes (structure, operate, measure, settle), roles & responsibilities	Activation Register, onboarding & mandate process, product combination
FSP–DSO contract = Access contract Flexibility	<i>Overeenkomst tussen de DNB en de FSP in het kader van de levering van flexibiliteitsdiensten door het gebruik van flexibiliteit bij distributienetgebruikers</i>	Rights/obligations FSP–DSO, pool management, activation, data exchange	All DR4 topics

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Changes in DR4

1. Access Contract Flexibility
2. Mandate onboarding
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6. Central/local gateway

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1. Access Contract Flexibility

(Formerly FSP-DSO contract)

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Access contract flexibility

DR4 objectives

- 1 Congestion-ready contract** Evolve towards a “licence to operate” for all flexibility from DP on distribution by making the contract congestion-ready
- 2 Efficient mandating** Introduce a more efficient mandating approach *Separate agenda item*
- 3 Combination rules** Re-evaluate and describe product combination rules *Separate agenda item*
- 4 Regulator remarks** Address open regulator remarks on DR3 (mainly on liability)

+ Restructuring and textual improvements

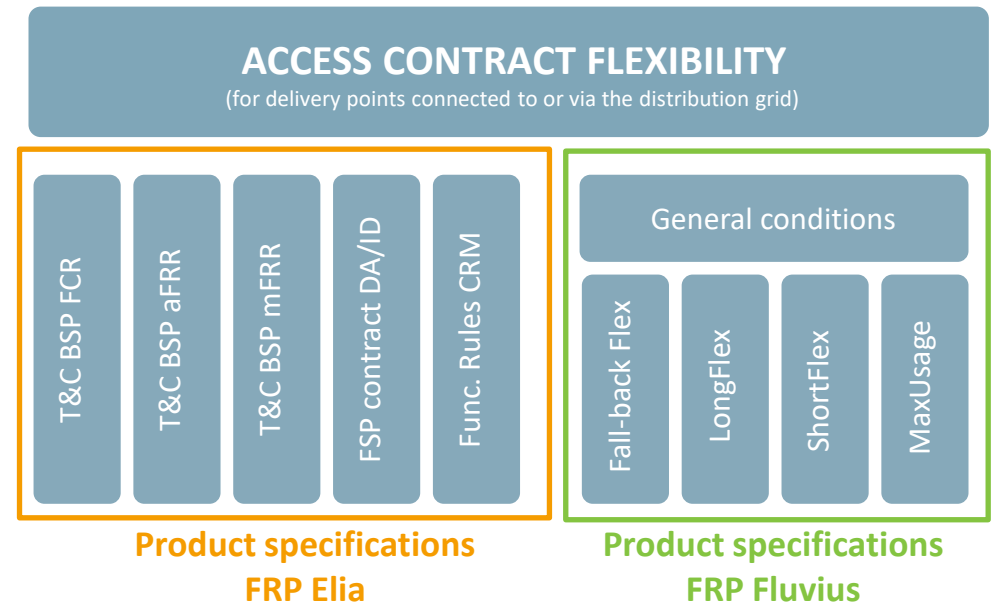
Access contract flexibility

Objective: make the contract congestion-ready

What changes?

- ✓ Maximally **generalize** clauses in the main contract
- ✓ Updated **scope** – regulated flexibility services or flexibility services with ToE
- ✓ **Work ‘by exception’**
 - Service catalogue only contains flexibility products with exceptions
 - Contract can be used for new products without need for prior update
- ✓ Added article on **settlement**

How the framework works



Impact on market parties

- Single overall contractual framework for all flexibility products
- New signature round

Access contract flexibility

New Service catalogue

Flexibiliteitsdienst	Specifieke voorwaarden
Frequentiebegrenzingsreserve (FCR)	- De DNB is niet betrokken bij de meting van deze flexibiliteitsdienst noch verantwoordelijk voor het ter beschikking stellen en overmaken van de meetgegevens aan de FRP. - In afwijking van artikel 4.7(c) moeten de activeringen van flexibiliteit niet aan de DNB gemeld worden. - In afwijking van artikel 5.3(d), mag voor punten aangesloten op het distributienet met spanning ≤ 1 kV een SDP-F zich bevinden achter de hoofdmeter van de installatie. Bijgevolg kan voor elk DP op/achter deze punten 1 SDP-F worden geregistreerd per product/FSP. - In afwijking van artikel 5.8(b) kan een Delivery Point Group punten bevatten van DNB's met verschillende werkmaatschappijen.
Automatische frequentieherstelreserve (aFRR)	- De DNB is niet betrokken bij de meting van deze flexibiliteitsdienst noch verantwoordelijk voor het ter beschikking stellen en overmaken van de meetgegevens aan de FRP. - In afwijking van artikel 5.3(d), mag voor punten aangesloten op het distributienet met spanning ≤ 1 kV een SDP-F zich bevinden achter de hoofdmeter van de installatie. Bijgevolg kan voor elk DP op/achter deze punten 1 SDP-F worden geregistreerd per product/FSP. - In afwijking van artikel 5.8(b) kan een Delivery Point Group punten bevatten van DNB's met verschillende werkmaatschappijen.
Capaciteitsremuneratiemechanisme (CRM)	- In afwijking van artikel 5.1(b) moet bij de prequalificatie een SDP-F gelinkt aan een aansluitingspunt op het distributienet met een spanning >1 kV nog niet gedekt zijn door een geldig aansluitingscontract. Het volstaat om te beschikken over een geldige offerte van de DNB voor de aansluiting. Zowel voor bestaande als additionele leveringspunten moet dus een EAN toegewezen zijn door de DNB op wiens net het punt is aangesloten. Ten laatste 60 dagen na de veiling moet, als het leveringspunt geselecteerd werd, de offerte voor de aansluiting ondertekend worden zodat een aansluitingscontract kan worden afgesloten. - Artikel 5.4(a) is enkel van toepassing op bestaande leveringspunten. - In afwijking van artikel 5.8(a) dient voor additionele leveringspunten en leveringspunten die behoren tot het CRM Versnelde Procedure scenario geen CCC aangevraagd te worden. - In afwijking van artikel 5.7(a) moet voor leveringspunten die behoren tot het CRM Versnelde Procedure scenario de procedure beschreven in Synergrid voorschrift C8/01 niet uitgevoerd worden. Voor additionele leveringspunten moet ze pas uitgevoerd worden als het leveringspunt van "additioneel" naar "bestaand" overgaat. - De FSP is zelf verantwoordelijk om het risico op eventuele tijdelijke beperking van de flexibiliteit in te calculeren in zijn bod in de CRM-veiling. De procedure beschreven in de C8/01 houdt geen rekening met eventuele mutueel exclusieve bids.
Transfer of Energy in day-ahead & intraday (ToE DA/ID)	- In afwijking van artikel 5.7(a) is het Synergrid voorschrift C8/01 niet van toepassing op deze flexibiliteitsdienst. - In afwijking van artikel 5.3(d), is deze flexibiliteitsdienst niet beschikbaar voor punten aangesloten op het distributienet met spanning ≤ 1 kV.

Liability

Objective: improve liability clauses and address DR3 remarks

What changes?

- **Reworking** of current articles 8 (**Liability**) and 9 (**Confidentiality and protection of personal data**)
 - Clarification of indemnification for claims from 3rd parties
 - Clarification of the relation between the contract and the Data Sharing Agreement
 - Separate articles on confidentiality and privacy
 - Clarification of the scope of the liability compensation
 - Corrections to wording and references
- Sublimitation per incident is replaced by **annual sublimitation per SDP-F**
 - Takes into account large differences in Pool size between FSP's
 - Overall annual limitation for all FSP's and incidents is maintained

Impact on market parties

- Removal of sublimit protecting DSO against one time incidents with major impact
- Fairer allocation of liability compensation to contracted parties

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(Formerly FSP-DSO contract)

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Mandate onboarding

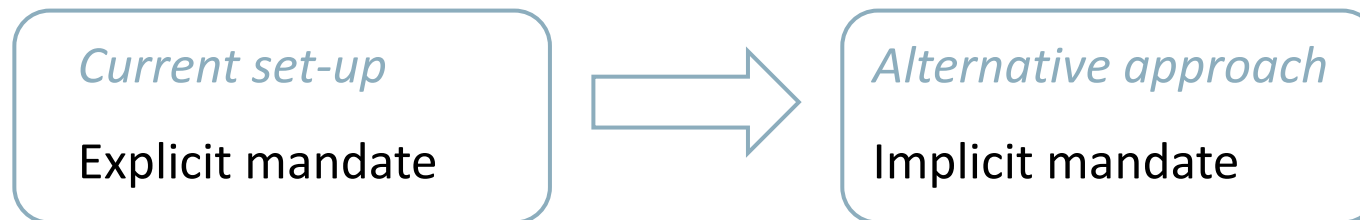
Goal: Lower the barrier to participation in Flexibility Market and prepare for the future

Key Elements of the Solution

Ex-ante review (mandate) for opening a supply point for the flexibility market

Ex-post review (monitoring and transparency) of flexibility market scenarios

*Analogy with the
Supply Market*



Current set-up: Explicit mandate

A signed document from the DNG is required for every FSP change.

- HV/MV: Submission via email and manual verification by DGO
- LV: Submission via the FSP's Unified Onboarding Request

→ Administrative barrier to smooth switching

→ System is not 100% foolproof

Flexhub will continue to support the current approach.

What follows is an alternative that Fluvius will adopt.
Other DGOs are free to decide whether or not to join in.

De Distributienetgebruiker

Naam:.....
Rechtsvorm:
Functie binnen de vennootschap:.....
Woonplaats of maatschappelijke zetel:
Exploitatiezetel(s):.....
Ondernemingsnummer:.....
Telefoon:..... E-mail:.....
Hierna genoemd: "mandaatgever"

verleent mandaat¹ aan:

Naam:.....
Rechtsvorm :.....
Woonplaats of maatschappelijke zetel:
Adres:.....
Ondernemingsnummer:.....
Telefoon:..... E-mail:.....
Hierna genoemd: "mandaathouder"

om in naam en voor rekening van de mandaatgever voor de volgende EAN nummers:

- EAN afname:
- EAN injectie:

met de Distributienetbeheerder de contacten en communicatie te verzorgen in het kader van (duid aan wat van toepassing is)

☐ Connection Contract Check (CCC)

☐ Network Flexibility Study (NFS)

☐ Resultaten van berekeningen en meetgegevens m.b.t. deelname aan flexibiliteitsdiensten aangeboden in de markt

Alternative approach: Implicit mandate

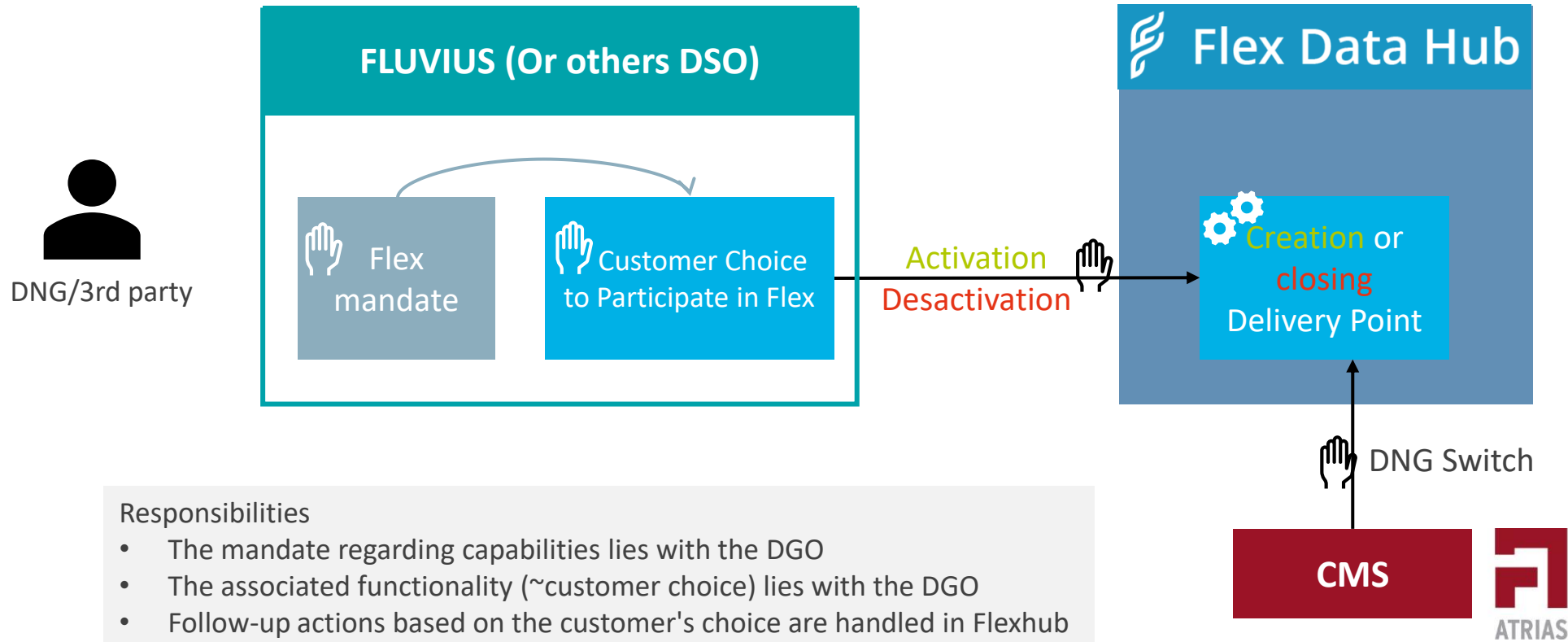
Implicit Authorization Through **One-Time Activation of the Delivery Point in the Flex Market**

1. The DNG (or an agent authorized by the DNG) **requests** that its DGO activates a delivery point.
→ *Implementation in Fluvius: via the My Fluvius portal*
2. By performing this activation, the **DNG agrees** that:
 - Any FSP may perform the CCC and NFS at the relevant delivery point as long as it is active in the flexibility market
 - The results of calculations and measurement data related to flexibility services may be shared with the relevant market participants
3. The DGO communicates these delivery points to **Flexhub**
4. After activation, any FSP may **onboard** the point without the need for separate mandate documents

Termination (~deactivation) is possible in two ways:

1. At the request of the DNG via its DGO
2. In the event of a DNG change: the new DNG must reactivate the delivery point once. → *Termination of all current FSP contracts*

Adding a service point to the flex market: how Flexhub 2.0 works



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(Formerly FSP-DSO contract)
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Product combination *with energy sharing (and supply split)*

Objective

- Clarify and further justify the exclusion of combining flexibility with ToE and energy sharing
- Anticipate the impact of supply split (submetering)

Updates

Analysis (further documented in evaluation report on combinability rules)

1. Ensure that simultaneous actions (same ISP) on one delivery point (DP) are in the same direction (UP or DOWN)
2. Ensure that flexibility or ToE volumes can be assigned unambiguously
3. Limit operational and financial overhead on low voltage DP for FSP, DSO and supplier

Results

- Combination of flexibility with ToE and energy sharing remains excluded. Initial customer choice will prevail
- Situations where allocated volume differs from measured volume are excluded

Impact on market parties

- Addition of DP to Pool will fail in case it already participates to energy sharing (and vice versa)
- (Future) supply split scenarios with volume optimization cannot be combined with flexibility products

Product combination *with congestion products*

Registration

System operators strive to **maximally allow simultaneous registration** for congestion and balancing products.

Activation

Simultaneous activation of flexibility for different flexibility services at the same delivery point will **not always be possible**.

Cooperation agreement

DSO's and Elia will make agreements on this in their cooperation agreement with a view to opening up flexibility as much as possible within the objective of minimizing total system costs.

Product combination *with CRM*

Combination with CRM is possible with different FSPs for balancing vs CRM

Context

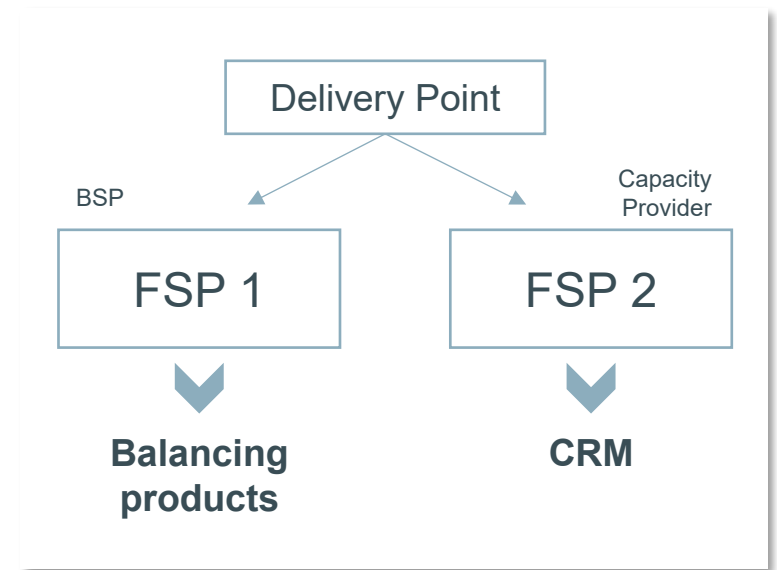
There was uncertainty about whether a delivery point can participate simultaneously in balancing services and the CRM when the FSP and the CRM Capacity Provider are different parties.

There was one case where this had led to an incorrect denial of a delivery point.

Clarification

Participation in **balancing products and CRM with 2 different FSPs is not a problem** because:

- CRM is an availability product and has therefore no impact on energy services provided in the context of balancing
- The impact of balancing (or e.g. redispatching) activations can be considered in the availability monitoring on the Delivery point in the context of validating the delivery of the contracted capacity in the CRM



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ToE DA/ID

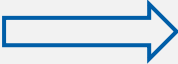
Context

During the public consultation on the ToE Rules under the Synergrid ToE Game Plan, Elia received **requests from market parties to reassess the ToE DA/ID product**.

Market participants are exploring ways to unlock the value of flexibility from battery assets and renewable generation, which the current ToE DA/ID design does not adequately support. To make the product suitable for these assets, several adaptations are required.

- The **proposal for the updated ToE DA/ID design is expected to enter public consultation in October** and will include improvements such as combination with aFRR in same QH and updated baseline methodology.
- DR4 provides an opportunity to **align the Synergrid documentation with the expected update of the ToE DA/ID design**.

Evolutions in DR4: Updates to C8.05

- 1 Replaced "access point" by "delivery point" 
 - Alignment with expected updates to ToE DA/ID design
 - ToE DA/ID can be applied on submeter level
- 2 Minor terminology corrections  Ensure terminology is consistent and correct

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Activation register: *what & why?*

A standard register to track flexibility activations at headpoint
(*Obligation today is only in Flanders*)

What changes?

- Introduction of an Activation **Register** containing information on flexibility activations (Both for “real” activations as for test/control activations & Both for balancing as for congestion).
- Standardisation** of how activation information is recorded and shared.

Why?

Legal obligation

Transparency & traceability

Better visibility for relevant parties

Facilitate market processes

Peak filtering for tests (Flanders)

Energy transfer (ToE)

Reporting for technical flexibility

Activation register: *scope*

Are in scope: All changes in the **profile** within the framework of **regulated flexibility products** of points connected to the **distribution grid** and meeting at least one of the following conditions:

Condition 1

Activation signal

A change in the profile of production, injection, consumption or uptake of electricity compared with the normal or existing consumption or production pattern, in response to a (test) activation signal.

Condition 2

Information required by the DSO

A change in the profile of production, injection, consumption or uptake of electricity compared with the normal or existing pattern for which the DSO needs information, for example when the DSO must calculate an energy-transfer volume.

Activation register: *scope*

Products in scope

	Balancing	Congestion	Adequacy
Elia	FCR (Pre-qualification tests, Availability tests) aFRR mFRR DA/ID	Redispatching (when connected to the distribution network)	CRM • Availability tests • All profile changes where energy transfer applies. SDR
Fluvius		ShortFlex Reactief beheer Technische flex	

Activation register

Information contained in each registration

- 1 FRP
- 2 Period of the profile change
- 3 Flexibility product
- 4 Test type

- 5 Access point or allocation point
- 6 Direction of the profile change
- 7 Date and time of the activation signal (if applicable)

Not included

Volume
Calculated separately

Example of registration

Date	Product	Type Of Test	Start Time (LT)	End Time (LT)	Start Time (GMT)	End Time (GMT)	Delivery Point Name	Delivery Point EAN	Afgewerkt via P6529	Afgewerkt via P6561
13/02/2025	aFRR	Prequalification	9:00:00	10:15:00	8:00:00	9:15:00				
13/02/2025	aFRR	Prequalification	9:00:00	10:15:00	8:00:00	9:15:00				
13/02/2025	aFRR	Prequalification	9:00:00	10:15:00	8:00:00	9:15:00				

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Central vs local gateway

Context

During discussions on opening explicit balancing to low-voltage assets, several stakeholders raised concerns that requiring a local gateway would jeopardize business cases, and require substantial time to adapt existing assets. As a result, a temporary authorization was granted to allow the use of a central gateway, giving market participants time to integrate the new gateway into their hardware and transition gradually. This temporary authorization has since been extended annually and, under the current regulatory framework, remains valid until 31 December 2027.

In practice, all low-voltage volumes are currently delivered through a central gateway. Requiring a local gateway for all assets would therefore create a major barrier to the further development of low-voltage flexibility in Belgium and could put a significant share of today's active volume at risk.

DR4 offers the opportunity **to establish the central gateway set up as a permanent solution alongside the local gateway set up**

Evolutions in DR4: Updates to C8.06

- 1** Remove requirements that impose a "local" gateway set up in the long term 
 - Lower entry-barriers
 - Central gateway is allowed as set-up in the long term
- 2** Removal of process descriptions (Content is limited to technical requirements)  Simplify - Remove elements that are not in scope of Synergrid documentation (given already in Elia documentation)

Content

Introduction

Changes in DR4

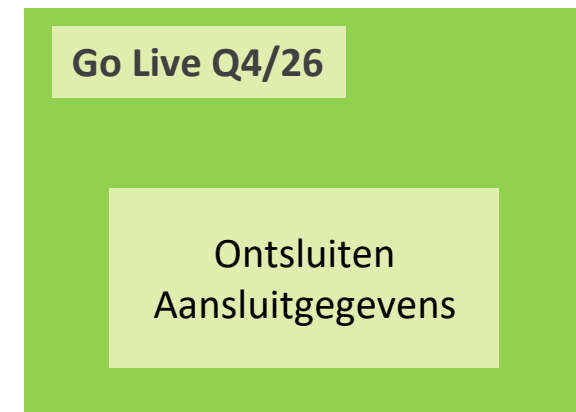
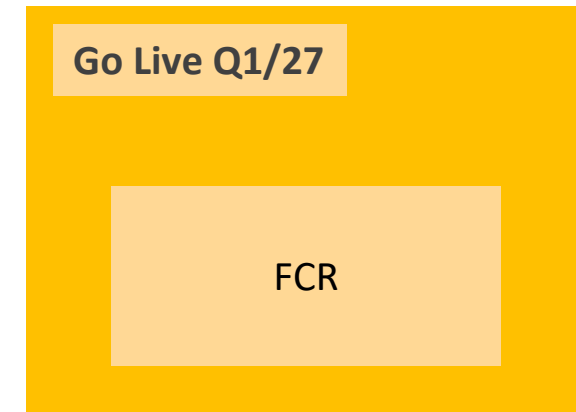
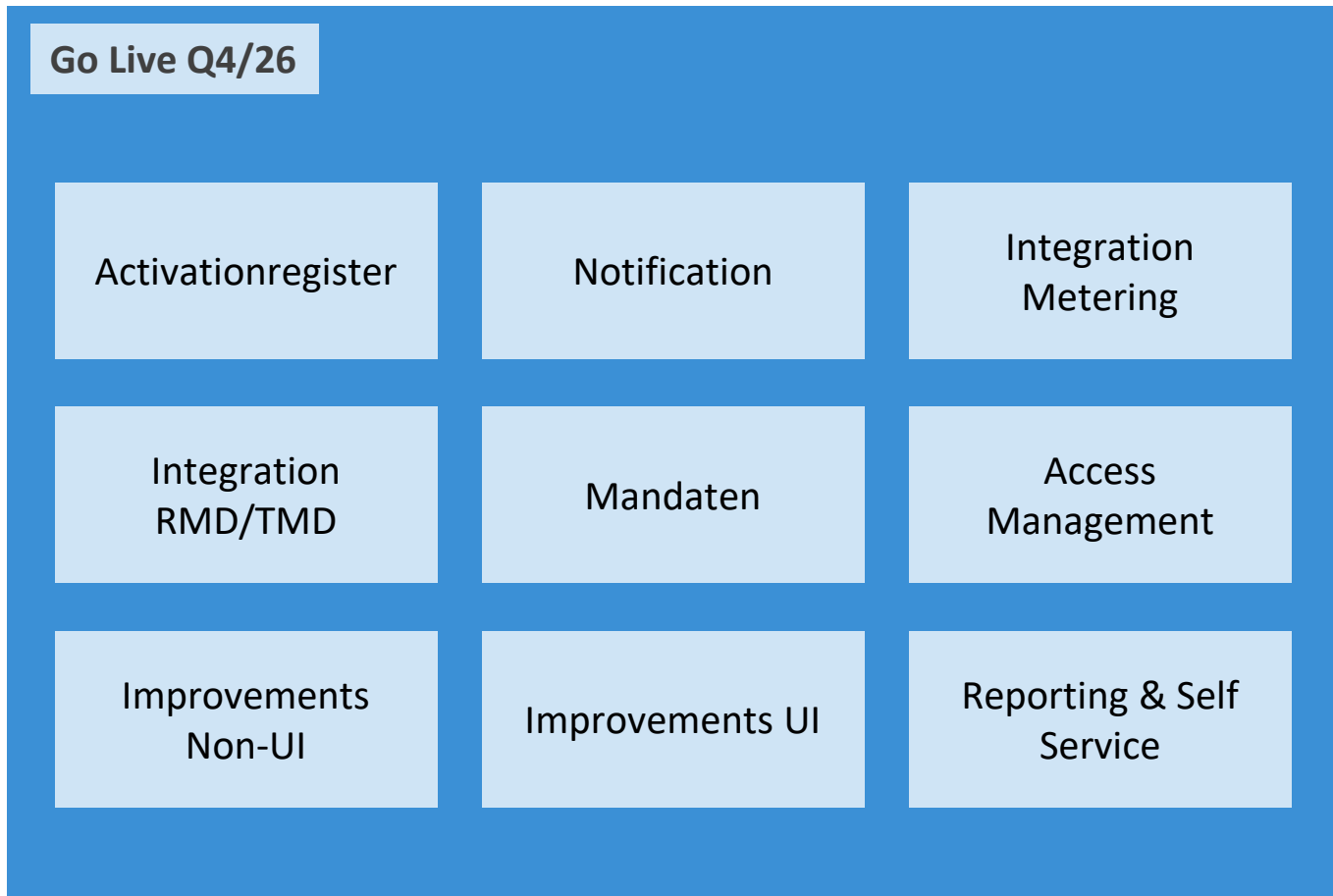
What Else?

- Transformation Part 2
- Voice of the customer
- POC congestion Fluvius
- POC congestion ORES

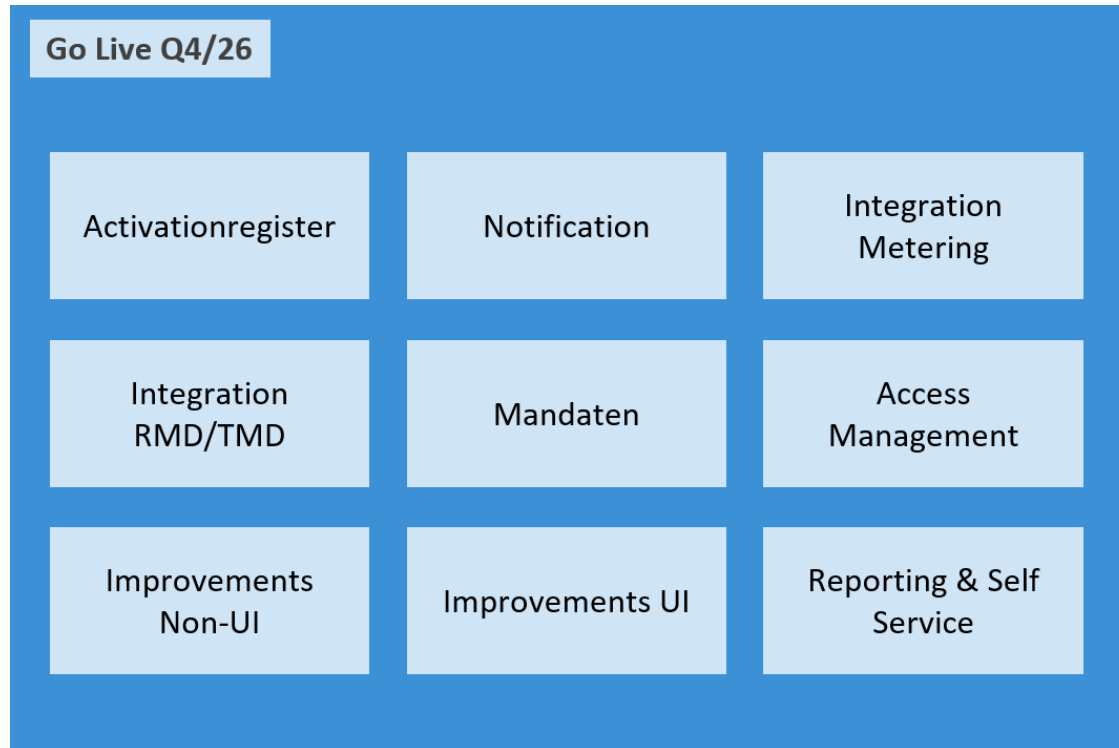
Conclusions & Next steps



What else? Transformatie Part 2: 3 Go Lives – 11 tracks



What else? Transformatie Part 2: 3 Go Lives – 11 tracks



- ✓ Support changes introduced in DR4
- ✓ Automatisations interfaces
 - To get rid of manual work
 - To allow higher accuracy
- ✓ Behind-the-scenes optimizations

What else? Transformatie Part 2: 3 Go Lives – 11 tracks

Go Live Q1/27

FCR

- Evolve from 2” -> 4” measurements
- Drivers:
 - Reduce data communication efforts
 - Harmonize process with aFRR

Go Live Q4/26

Ontsluiten
Aansluitgegevens

- Fluvius only
- Replace Contract Connection Check by website
- Look up data by authorized FSPs (even during pre-contractual phase)
- Disclaimer: TRDE modification needed (requested for end 2026)

What else? POC Congestion Fluvius

Flexibility services for management of local congestion



Timings:

- Webinar: 15/09/2026
- Tender publication: 28/09/2026
- Opening Reservation Auction: 5/10/2026
- Closure Reservation Auction: 18/10/2026
- Activation Market: November - February



De drie flexproducten in één oogopslag

	MaxUsage™	LongFlex™	ShortFlex™
Samenvatting	Vermogen blijft onder de afgesproken grens.	Vermogen beschikbaar houden en aanbieden in de ShortFlex™-markt.	Vermogen activeren op het afgesproken moment en in de afgesproken richting.
Richting UP	Afnamevermindering	Afnamevermindering en injectieverhoging	Afnamevermindering en injectieverhoging
Richting DOWN	Injectievermindering en afnameverhoging	Injectievermindering en afnameverhoging	Injectievermindering en afnameverhoging
Vergoeding	Service fee €/MWh	Reservatievergoeding €/MWh	Activatievergoeding €/MWh
Termijn	Lange termijn	Lange termijn	DA/ID
Benodigde leveringen	Momenten opgegeven in tender	Momenten opgegeven in tender	FRP selecteert leveringen uit de aangeboden volumes.
Activatietype	Scheduled dispatch	Via ShortFlex™	Scheduled dispatch
Minimum bidsize	Min. 5 kW voor alle producten		

Bron: Deelnamegids marktflexibiliteit, p. 4

What else? POC Congestion Fluvius

Flexibility services for management of local congestion



General information:

<https://partner.fluvius.be/nl/flexibility-service-provider>

Webinar:

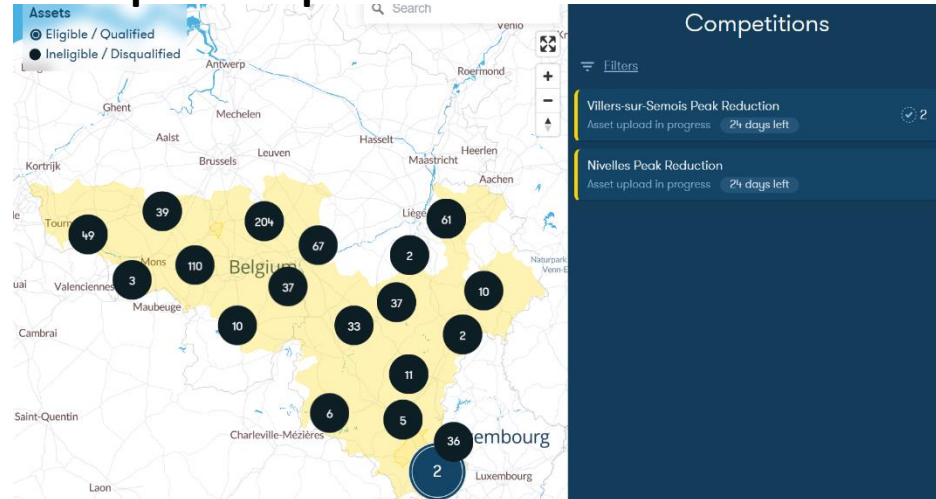
<https://vimeo.com/1227398976/b8d5fd0092?fl=ip&fe=ec&share=copy>

Contactform: <https://www.fluvius.be/nl/contact/contactformulier/verwachte-netcongestie/flexibility-service-provider>

What Else? POC ORES (Piclo platform)

Local Flexibility services for local congestions

Two open competitions for this winter



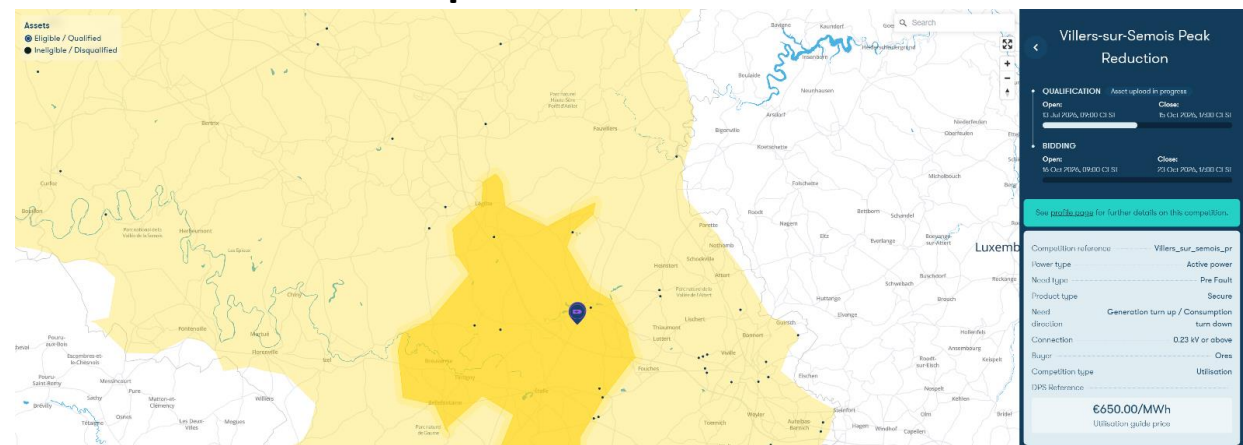
Two Market Products offered

	Peak Reduction (PR)	Reactive Power
Direction	Load reduction or increasing production	Reactive power compensation
Price	Bid price (€/MWh)	Bid price (€/MVarh)
Expected total volume	2 substations 512 MWh	TBD
Delivery Period	Winter 26-27 (Dec-Feb)	Summer 27 (May- Sept)
Minimum bid size	100 KW	100 KW

Timings

- Webinar: 08/07/2026
- PR Tender publication: 13/07/2026
- Opening PR Auction: 16/10/2026
- Closure PR Auction: 23/10/2026
- Delivery: Dec26-Feb27 – Weekdays

Zoom on Villers' competition



What Else? POC ORES (Piclo platform)

Local Flexibility services for local congestions

Contacts and useful links

Charles Masson

Market Relationship Manager

charles.masson@ores.be

(Subjects : Principal contact for FSPs – Contracts)

Thomas Buisseret

Innovation Coordinator

thomas.buisseret@ores.be

(Subjects : Project details, Flex products, platform)

Piclo Platform and related documentation

<https://www.piclo.com/profiles/ores>

(Subjects : Webinar, Flex Products, Onboarding documents)

What else? Voice of the customer



Why we exist

Raise customer awareness on specific topics and make the value clear to end consumers.



What we're working on

Preparing 2 focused campaigns:

- Flexibility in the context of incompressibility for MV industrial & tertiary customers
- Changing habits for LV residential EV chargers



How we measure

Reach, engagement and change in habits (price reaction or change in load curve, ..) — tracked simply, reviewed regularly.

Content

Introduction

Changes in DR4

What Else?

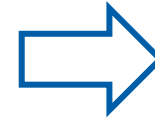
Conclusions & Next steps



Document Release 4 Objectives & Changes

Key objectives

- 1 **Simplify and streamline** the framework for explicit flexibility and deliver a more transparent, harmonised and scalable market model.
- 2 Prepare the market for **congestion management** and anticipate future **European developments**.
- 3 **Remove barriers** to flexibility



Main changes

- ✓ Access Contract Flexibility
- ✓ Mandate onboarding
- ✓ Product combination
- ✓ ToE DA/ID
- ✓ Activation register
- ✓ Central/local gateway

Document release 4: Consultation practicalities

Consulted documents

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

Additional material

Slide deck and introduction note

([Product Design Flexibiliteit – Synergrid](#) / [Product Design Flexibilité - Synergrid](#))

Consultation Period

28/09/2026 - 9/11/2026

How to respond

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



Thank you!



List of abbreviations

Abbreviation	Meaning
aFRR	Automatic Frequency Restoration Reserve
CCC	Connection Contract Check
DA	Day-Ahead
DP	Delivery Point
DSO	Distribution System Operator
FIS	Flexibility Information System
FRP	Flexibility Requesting Party
FSP	Flexibility Service Provider
HV	High Voltage
ID	Intra-Day

Abbreviation	Meaning
LV	Low Voltage
mFRR	Manual Frequency Restorariion Reserves
MV	Medium Voltage
NC DR	Network Code Demand Response
NFS	Network Flexibility Study
SDP-Flex	Service Delivery Point Flex
SO	System Operator
ToE	Transfer of Energy
TSO	Transmission System Operator