

Subject: Comments on the public consultation on the market functioning rules for the compensation of quarter-hourly imbalances  
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Please find hereafter the comments of FEBEG on ELIA's public consultation *on the market functioning rules for the compensation of quarter-hourly imbalances*

- P12. Last bullet point of Article 3. The reference to articles 226–227 of the Federal Grid Code is not correct. These articles do not foresee the follow-up of the availability of the balancing services in real time. Refusal of program changes is also not foreseen in article 226 of the FGC.
- P15. (6.2.4)
  - o In the 2nd paragraph : “de Aanbieder moet de gereserveerde volumes [...] ter beschikking stellen, *volgens de voorwaarden beschreven in §8.2*”. Art 8.2 concerns only the control and penalties on activations. The reference to 8.2 should be removed, or 8.2 should be completed with the conditions to put the volumes at disposal of Elia.
  - o the 3d paragraph : the secondary market for FCR is not only open to CIPU units, but also to non-CIPU units
- p16. (6.2.5) Vergoeding : the remuneration system is of the type “pay as bid” only for the local auction platform. For the regional auction platform it is a system of the type “pay as clear”
- p17. (6.2.6) and P27. (8.2.1) Controle en penaliteiten : the calculation of the penalties should be updated conform the provisions of the GFA FCR.
- P44. The last paragraph of 9.1 concerns Slow non-CIPU Incremental bids and should be removed.
- P52. (10.6) Monitoring van de secundaire markt. The transfer of obligations are between BSPs, not between BRPs.