



## Answer from BSTOR SA/NV to the public consultation on a proposal for amendment of the T&C BSP aFRR

BSTOR SA/NV (“BSTOR”) welcomes the opportunity given by Elia to provide feedback and would like to thank Elia for their efforts to provide clarity and transparency on the proposal.

Please find below BSTOR contribution to the consultation. This answer can be considered as non-confidential.

### 1 BSTOR

BSTOR SA/NV is the battery storage assets origination, development, financing and operation vehicle from Ackermans & van Haaren, the SRIW-Environnement and Bruno Vanderschueren.

BSTOR owns 75% of ESTOR-LUX SA, the « Special Purpose Vehicle » owner of the ESTOR-LUX project in Bastogne (10MW / 20MWh), Belgium’s first battery park connected to the high voltage grid.

BSTOR aims to develop a pipeline of at least 150 MW of storage battery capacity, established on several sites, with the objective of concluding the financial close by 2024 and ensuring its commissioning by 2026.

### 2 Answer to the consultation

BSTOR generally supports the proposals in the amendment, and has one question and one request.

- For every energy bid, a Full Activation Time lower than 5 minutes may be specified, with a minute granularity. Will a FAT of 0 minutes be allowed or is there a minimum FAT > 0? As there is a 2 Time Step delay for determining the ‘aFRR MW discrepancy’, for eg a BESS, this should be more than enough time to supply its full power and respect the activation control rules, so BSTOR sees no reason for not allowing a FAT of 0 minutes.
- In the context of Low-Voltage Delivery Point Groups requiring a minimum size of 0.1MW, BSTOR would like to propose to reduce the granularity of capacity and energy bids (all bids, not the LV ones) to 0.1MW (still respecting the minimum bid size of 1MW). This would enable much more optimal participation of small-scale capacities without integrating very large DP groups. In current situation a (group of) assets with a prequalified capacity of 1.9 MW can only bid 1 MW, while lowering the granularity to 0.1 MW would allow the full 1.9 MW. We believe it is in the interest of Elia to foster maximal participation of already prequalified assets and don’t believe this would create an additional (computational) burden if minimum size bid is not lowered.