- **Name:** Damien Lepage
- **Email:** damien.lepage@bnewable.com
- **Organization:** Bnewable
- **Comments/suggestions to the consultation:** Bnewable, as an emerging Belgian energy company specialising in (behind-the-meter) hybrid battery storage systems, we would like to express our sincere appreciation for the opportunity to participate in the public consultation regarding the 'revision of the requirements concerning the Energy Management Strategy (EMS) for the Delivery Points with Limited Energy Reservoirs (DP with LER)'. We are pleased that Elia is committed to transparency and involvement of diverse market participants, including newcomers like us.

  First and foremost, we want to emphasize that our reaction to this consultation is non-confidential, and we would appreciate its inclusion in the consultation report.

  Regarding the current consultation on the EMS requirements for LERs, we appreciate Elia's effort to harmonize the requirements for FCR and aFRR balancing services. We also welcome the possibility to use 15-min and 30-min intraday products, allowing for more precise Energy Management Strategies for LERs.

  We however regret the additional burden that the new "targeted monitoring" introduces. Implementing aFRR is already today a huge endeavour: only in terms of IT one needs to integrate its systems with at least 4 different Elia platforms (STAR, BIPLE, RTCP, ATP, …. – some of these platforms being intended for monitoring and availability tests already). Bnewable is strongly opposed to making aFRR implementation and operations even more complex, certainly when the need for additional monitoring is not justified by frequent occurrences of LERs failing to deliver balancing activations. As a side note, we also do not understand in what sense this monitoring would be "targeted" as it seems to be a task to be executed by all BSPs and LERs, every year.

  Finally, we want to address the new requirement of including into the EMS description all non-contracted services that the LER might perform. We understand the need for such requirement when part of the battery power or storage capacity is shared by contracted and non-contracted services (e.g. in the explanatory note you describe a usecase where a +/- 9MW power band can be used for non-contracted services when the SoC is in the range 40-60%, and serves as aFRR SoC management power when SoC is outside those bounds). However, another way to combine contracted and non-contracted services is to virtually split the battery in two. In this case there is no shared power or shared storage capacity, and the two virtual batteries operate as if they were physically distinct. In such operation mode there is no justification for Elia to approve what services the non-contracted virtual battery can participate in.
  Moreover, in a behind-the-meter (BTM) battery context such as Bnewable, the range of non-contracted services a battery may operate in is far broader than in a front-of-the-meter (FTM) context. Asides from non-contracted market services like intraday trading there is a whole range of local services the battery may have to perform, such as peak-shaving or self-consumption optimisation. A whole new range of DSO grid services is also opening up, such as congestion services or reactive power services. It is therefore a significant burden for BTM batteries or DSO-connected batteries having to describe all non-contracted services the battery may perform, under what conditions and with what lead times. This list would also have to be extended or amended as new services appear, turning the one-off task into a recurrent obligation.

  Bnewable looks forward to receiving clarity on the concerns raised regarding the amendments of the EMS requirements for the DPs with LERs. Bnewable is and remains fully available for further discussions on the positions outlined above and is willing to actively contribute and cooperate to the practical and timely implementation of these new requirements.
- **Upload additional documents if needed:**

Answer confidential: Completely non-confidential