

Reference	Remark	Rationale	Region-specific comments
2.6.2.1	- The methodology should not require that the Delivery Point ID generated by the CRM interface is known to future grid users that participate with the same DP - The Delivery Point ID should be brought in line with the FSP-DSO contract (SDF-flex)	- One cannot expect grid users (in the future potentially at LV) to pass on CRM-generated IDs with customer switches - We should avoid different identifications between TSO and DSO	
4.3.1.2	There seems to be a contradiction in step 1 with the fact that the DSO should be contacted prior to submitting the prequalification file	'A' is the submission date of the prequalification file	
4.3.1.2	The FSP-DSO contract (DSO-CRM candidate agreement) should be signed before submitting the prequalification file	The FSP should agree with the general terms & conditions of the contract, otherwise the DSO will not perform the prequalification	
4.3.1.2	- The metering requirements are verified during prequalification, not before signing the DSO-CRM agreement - The communication of the NRP to Elia also confirms compliance with the metering requirements	-	Ores position is that this must be re-evaluated after 2024
4.3.4	Secondary market transactions involving DSO-connected DP should also be notified to the DSO	The capacity contracted in the CRM is not subject to potential constraints in a red zone as a result of an NFS	
5.2.1	A capacity Holder is <u>required</u> to timely get in touch with relevant grid operator(s)	'invited' is not strong enough	
5.2.3.1.1	The minimum requirement for a DSO-connected DP is a proposal for a connection contract valid until after the clearing of the auction	This is linked to the capacity reservation process at the DSO (for generation)	
5.2.3.1.2	The DSO must perform the data management of the submeter connected downstream of a DSO-connected Access Point	CRM candidates should adhere to the DSO roadmap for submetering	
5.2.3.2.1 (92)	In case of DSO-connected points, the connection contract is independent of the auction. At least a valid proposal from the DSO needs to be available at prequalification submission time. The connection can be put into service as soon as the connection contract is signed (or on the service start date foreseen in it).	This is linked to the capacity reservation process at the DSO (for generation)	
5.4.1.1	In the Table, it seems logical that the NRP for DSO-connected DP would also be Declared by the CRM Actor, not determined by the DSO	The DSO does not necessarily have the information to determine the NRP	
5.4.1.1.1.2.2 (142)	Can the information be written by Elia in the FlexHub? Or at least leave the means of communication open so that it can be decided operationally	No need to limit the communication options here	
5.4.1.1.2	The DSO should not determine the NRP for additional points	See 5.4.1.1	
5.4.1.1.3	It is unclear why the DSO should agree on the Declared NRP	-	
5.4.2.2.1 (170)	The proposed classification of 'opt-out' volumes does not seem to cover the case where an existing point on the DSO net will be decommissioned in the delivery year and replaced by new production behind the same Access Point. The latter will be an additional DP in the standard prequalification track, the former an existing DP in the fast track. For the DSO, it is important that the existing DP is regarded as OUT	In order to correctly determine the demand curve, the CRM candidate should be able to communicate the fact that the capacity for the existing DP is OUT. This currently only seems to be possible for TSO-connected capacity A Capacity Holder in the fast track has no incentive to provide a motivational letter, as he would typically not care whether his capacity was regarded as IN or OUT	
General	Should the NRP computation be modified to exclude peaks resulting from activation and verification tests for TSO ancillary services?	These peaks are also excluded for the capacity tariff computation (in Flanders)	This remark is currently only applicable to Flanders
5.6.2.1 (209)	An adaptation of the DSO-CRM candidate agreement does not lead to a change in NRP, unless the agreement is terminated altogether	The FSO-DSO contract is a framework contract, delivery point are added later on to it	
8.4.2.1.1 (364)	Pre-delivery measured power should be determined by the DSO	The DSO has all the 15' values available, there is no need to send the raw values to another platform (same rationale as for NRP computation)	
9.4.3.2	Available capacity for availability monitoring or testing should be determined by the DSO	The DSO has all the 15' values available, there is no need to send the raw values to another platform (same rationale as for NRP computation)	
18.1.3.2.3	The DSO-CRM agreement is signed prior to the submission of the prequalification file to Elia	See also 4.3.1.2	