

ELEXION

**Capacity Market Advisory Group (CMAG)
Meeting 11**

15 August 2023

Agenda Item	Lead
Standing Items	
1. Welcome and Apologies	Elliott Harper (CMAG Facilitator)
2. CM Representative Updates	LCCC/ESC; EMR Delivery Body; Ofgem and DESNZ
3. CMAG Secretariat Update	Elliott Harper and Amy Stackhouse (CMAG Secretariat)
Decision Items	
4. Developing CM Rules Change Proposal – CP373 'Delivery Body and Settlement Body Metering Process'	Chris Arnold (CMAG Secretariat) and Bir Virk (LCCC/ESC)
5. Developing CM Rules Change Proposal - CP372 'Change to Rule 4.4.4' - CMAG	Amy Stackhouse (CMAG Secretariat)
6. Developing CM Rules Change Proposal – CP362 'CM Agreement Transfers' – Waters Wye Associates	Chris Arnold and Lisa Waters (Waters Wye Associates)
7. Developing CM Rules Change Proposal – CP371 'Protection from Very Late Network Connections' – Waters Wye Associates	Chris Arnold and Lisa Waters (Waters Wye Associates)
Information Items	
8. Industry Feedback <ul style="list-style-type: none"> • Opportunity for stakeholders to provide constructive feedback to Delivery Partners 	Elliott Harper
9. Government Policy Impacts Session <ul style="list-style-type: none"> • No items planned for this standing agenda item for August 2023 	Elliott Harper
10. CMAG Forward Work Plan	Chris Arnold
11. Action Log	Amy Stackhouse
12. Any Other Business (A.O.B)	All

Meeting Agenda – Scheduled Breaks

- Set breaks at:

Break Type	Time
Comfort Break	11:30 – 11:40
Lunch	12:45 – 13:30
Comfort Break	14:30 – 14:40



WELCOME AND APOLOGIES



CM REPRESENTATIVE UPDATES

- LCCC/ESC
- EMR DB
- OFGEM
- DESNZ



CMAG SECRETARIAT UPDATE

CMAG Meeting Dates 2023/24

The following dates have been provisionally booked for future CMAG Meetings:

- Meeting 12 – Thursday 21 September 2023
- Meeting 13 – Tuesday 17 October 2023
- Meeting 14 – Thursday 23 November 2023
- Meeting 15 – Wednesday 13 December 2023
- Meeting 16 – Tuesday 16 January 2024
- Meeting 17 – Tuesday 20 February 2024
- Meeting 18 – Tuesday 19 March 2024
- Meeting 19 – Tuesday 16 April 2024
- Meeting 20 – Tuesday 21 May 2024
- Meeting 21 – Tuesday 18 June 2024
- Meeting 22 – Tuesday 16 July 2024

Are there any CM activities that would clash with these meeting dates?

CMAG Member Experience Survey - Placeholder

Members who have not yet completed the CMAG Member Experience Survey are requested to do so by **Wednesday 9 August 2023**.

The Survey can be accessed via this

link: https://forms.office.com/Pages/ResponsePage.aspx?Host=Teams&lang=%257Blocale%257D&groupId=%257BgroupId%257D&tid=%257Btid%257D&teamsTheme=%257Btheme%257D&upn=%257Bupn%257D&id=hVMjGild4UCW_bxewnBjYRWB1unxW7dGkGUAjf_mhMIUMjhBTVM5NIkxRDhIQTAzM003RzVaTUtWTiQIQCN0PWcu

Please contact CMAG@Elexon.co.uk if you have any queries.



DEVELOPING CM RULES CHANGE PROPOSALS

CP373 'DELIVERY BODY AND
SETTLEMENT BODY METERING
PROCESS' - LCCC/ESC AND EMR
DB

What is the issue?

In progressing the New Portal project, the EMR Delivery Body has been working closely with the Settlement Body to define and deliver integrated processes. In a joint review, we are recommending a transfer of ownership and roles and responsibilities from Delivery Body to Settlement Body for the following processes:

- Metering Aggregation
- Metering Assessment
- Metering Test
- DSR component Reallocation

In the existing process to carry out Metering processes is overly complex process where the data owner is not the data controller creating excess cost and risk.

What is the proposed solution?

We are recommending a transfer of ownership and roles and responsibilities from Delivery Body to Settlement Body for the following processes:

- Metering Aggregation
- Metering Assessment
- Metering Test
- DSR component reallocation

Standard Change Proposal Questions

- Does the CP further the CM Rules Change Objectives?
- Are there any related changes to the CM Rules in the pipeline?
- Does the CP impact on the Regulations?
- Are there any impacts on any other central industry frameworks or obligations?
- Are there any impacts on consumers, and if so, what are the impacts?
- Does CMAG agree with the proposed solution?
 - Are there any suitable alternative solutions to address the defect?
- What are the expected impacts on:
 - CM Participants?
 - Delivery Partners?
- What are the expected implementation/enduring costs for:
 - CM Participants?
 - Delivery Partners?
- What are the expected timescales for implementation?
- Does the draft legal text deliver the intention of the solution?
- Does the CMAG recommend to Ofgem that the change be made?

Are there any specific change proposal questions?

CP372 'CHANGE TO RULE 4.4.4' CMAG

What is the Issue?

Rule 4.4.4 prevents a change in the configuration of Generating Units that comprise a CMU, once that CMU has prequalified. A CMU may need to change its configuration in order to ensure delivery against unforeseen issues, or for older plants to adopt new, low carbon technologies on site.

There is a risk of termination which arises from a prospective Generating Unit within a CMU that can no longer deliver as originally proposed during Prequalification.

What is the Proposed Solution?

Amend Rule 4.4.4 to allow CMUs to change their configuration after prequalification, so long as they do not lower their de-rated capacity and Auction Acquired Capacity Obligation (AACO).

CP372 – Change to Rule 4.4.4 Recap

- Changing Rule 4.4.4 has been discussed since 2018, including as part of Ofgem’s 5yr review and Consultations but was postponed in 2021 because of the potential impact on the impending DB Portal 2.0.
- This potential change to Rule 4.4.4 has then been discussed by CMAG at Meetings #6-10 and drafted as CM Rules Change Proposal CP372.
- However, there remain a number of key questions to be resolved before any drafting of appropriate legal text can be completed.
- **The CMAG Secretariat proposes CMAG reviews the specific change proposal questions for CP372, and provides a CMAG view on each, before the legal text for CP372 is reviewed and re-drafted.**

Change to Configuration

Query	<p>For a Generating Unit (Component) what constitutes:</p> <ul style="list-style-type: none">• Maintenance, ie without any restriction by CM Rules;• Reconfiguration, to be controlled by a reworded Rule 4.4.4; and• Refurbishment, creating a new version of a Component for a Refurbishing CMU?
Proposed Legal Text	<p>Current draft text provides for changes to configuration related to:</p> <ol style="list-style-type: none">a) Fuel Type;b) Generating Technology Class;c) Metering Arrangement; andd) Connection Capacity.
Secretariat Review	<p>What about changes not covered by the above proposal but will improve the efficiency, effectiveness, sustainability, contribution to Net Zero and overall security of supply, eg:</p> <ul style="list-style-type: none">• Engines (number, size, manufacturer),• Batteries (number, size, chemistry, format, manufacturer)• Adding a Storage Facility• Adding CCUS

CP372 – Specific Change Proposal Questions

De-rating Factors

Query	<p>What De-rating Factor (DF%) should be used for Components added to a CMU?</p> <p>What DF% should be used for a change in Generating Technology Class reconfiguration of a Component?</p>
Proposed Legal Text	<p>Use the latest De-rating Factor for the DY where there is a change in Generating Technology Class.</p>
Secretariat Review	<p>As per 2.3.3 Secondary Trading (ST) should use original DF% for the Auction, so using the latest DF% for Generating Unit reconfiguration or reallocation would appear to be inconsistent – suggesting 4.4.4 reconfiguration or reallocation should use the original Auction DF%.</p> <p>However, DB implementation for ST differentiates between those who PQ for the original Auction (so use Auction DF%) and those who did not, so are Secondary Trading Entrants and use T-1 DF% for the DY of the ST.</p>
Outstanding Matters	<p>Suggested change to Rule 2.3.3 to be discussed at CMAG Meeting 12.</p> <p>Ofgem have an action to clarify the policy intent behind Rule 2.3.3 and what De-rating factor Secondary Trading Entrants should use</p>

CP372 – Specific Change Proposal Questions

De-rated Capacity

Query	Should De-rated Capacity of a CMU be allowed to change as a result of changing configuration of a Generating Unit or reallocation of Components in a CMU?
Proposed Legal Text	Only allows configuration changes that do not lower the De-rated Capacity of a CMU and hence its AACO.
Secretariat Review	<p>A Prospective CMU can deliver a lower De-rated Capacity up until it meets its SCM/MCR. It would therefore be inequitable to restrict the impact of Reconfiguration/Reallocation on reducing De-rated Capacity until at least then, ie when the Agreement becomes effective.</p> <p>[* This limit should be changed to one related to the LSD, which may have been extended by 6.7.7]</p> <p>The Existing Rules do not allow De-rated Capacity to increase, except for a Prospective CMU which can increase its De-rated Capacity back towards 100%, for 18* months from start of DY1, where SCM/MCR was achieved at <100%.</p> <p>If a Prequalified CMU is able, through Reconfiguration/Reallocation, to increase its De-rated Capacity, why shouldn't it? Its AACO would be fixed but has now increased the market's security of supply and could even take on PTCO-in.</p>

CP372 – Specific Change Proposal Questions

Financial Commitment Milestone (FCM)

Query	<p>What happens regarding a CMU’s FCM if a Component is Reallocated away from it after passing FCM?</p> <p>What impact does an added Component have on a CMU’s FCM, if the Component was part of a previous CMU before that CMU passed FCM?</p>
Proposed Legal Text	<p>Current Rules do not address Generating Unit Reallocation, so do not consider the impact on FCM.</p> <p>However, FCM is mentioned in relation to 8.3.7 Notifying change of address, of a Component, where (c) requires FCM.</p>
Secretariat Review	<p>The policy intent regarding FCM and 8.3.7 is unclear because it uses “Component(s) <u>is or will be</u> different from the location described in the Application”.</p> <p>For Component Reallocation, it doesn’t seem to make sense for FCM be required before a change of Component is permitted?</p> <p>How should a CMU’s Financial Commitment be allocated between Components for any Reallocation?</p>

CP372 – Specific Change Proposal Questions

Total Project Spend (TPS) and Extended Years Criteria (EYC)

Query	Where the CMU has passed the Evidence of Total Project Spend, how could it confirm that the component(s) being removed will not be used to ensure that a different CMU meets the CAPEX thresholds for longer agreements?
Proposed Legal Text	Current restrictions within Rules only apply to Refurbishing CMUs and prevent TPS previously declared as part of CMU from being re-used for another CMU. This could be mirrored for Reallocation of Components into New build CMUs.
Secretariat Review	<p>Within a single Capacity Provider group such a restriction might be justifiable, to prevent manipulation of intra-group transfer values. However, such manipulation could be prevented by ensuring the new CMU's ITE report verified if the same Component, or even items of plant, had already been used to meet TPS/EYC thresholds on other CMUs within the Group (as required by 8.3.6/8.3.6A).</p> <p>However, between independent Capacity Provider's Prospective CMUs this is not justifiable, because the new CMU will have an ITE verified cost of what that independent Capacity Provider had paid for the Component or plant.</p> <p>How should common site/infrastructure spend be allocated between Components, eg by De-rated Capacity, or rely in ITE report of TPS per Component?</p>

CP372 – Specific Change Proposal Questions

Changes within Delivery

Query	<p>Should changes be allowed within a Delivery Year, ie after the start of the first DY of an Agreement? Lack of clarity of the value of allowing changes during a Delivery Year, as CMUs are able to trade away their obligations. Allowing a CMU to change components would adversely impact on the secondary trading market. DB do not support enabling component changes within Delivery Year, as, once the Delivery Year has commenced, a CP begins to be paid to deliver and needs to provide assurance that their setup is able to deliver during a stress event. Permitting unlimited changes to the assets expected to deliver the Capacity Obligation introduces significantly more complexity.</p>
Proposed Legal Text	<p>The previously proposed (at CMAG #8) 4.4.4A included a deadline for Reconfiguration before the start of the first DY.</p>
Secretariat Review	<p>Prospective CMUs will only see their Capacity Agreements become “effective” once they achieve SCM or MCR, which can be up to 120WD after DY1 for MCR, or even longer if LSD is extended under 6.7.7. For Existing Generating CMUs, or Prospective CMUs once “effective”, preventing Reconfiguration within DY might only result in reduced security of supply (because of reduced performance) or continued use of less efficient equipment. It should always be in the interests of security of supply and Net Zero to encourage investment in more efficient plant by allowing reconfiguration.</p> <p>Relying on Secondary Trading disadvantages the T'or by the discount applied to the commercial arrangements reached with the T'ee and</p> <ul style="list-style-type: none">• previous trading shows us a significant proportion of T'ees are older, less efficient, plant such as reciprocating engines. <p>Additional complexity for DB is not a reason to not progress the CP in the interests of Capacity Providers.</p>

CP372 – Specific Change Proposal Questions

Prequalification and Assurance

Query	<p>Any changes to configuration should not adversely impact CMU's original Prequalification results.</p> <p>What additional assurances are required for component changes made within a Delivery Year?</p>
Proposed Legal Text [CMAG #8)	<p>4.4.4B Any changes to the configuration of a Prequalified CMU under Rule 4.4.4 may only be made subject to:</p> <ul style="list-style-type: none">(a) The new CMU configuration meeting any outstanding milestones;(b) A declaration being made, and any relevant evidence being submitted, to [the Delivery Body] confirming that the change of CMU components has not impacted any completed milestone;(c) The new CMU configuration obtaining Relevant Planning Consents pursuant to Rule 3.7.1;(d) The new CMU configuration obtaining Connection Agreements pursuant to Rule 3.7.3; <p>[DQ what about: - Fossil Fuel Component, - Fossil Fuel Emissions Commitment, and - Storage Facility?]</p> <ul style="list-style-type: none">(e) Where there is a change to the Metering Arrangement [Metering Configuration Solution] for the CMU, the CM Settlement Body confirming [approving] the change to the Metering Configuration [Solution] as set out in Rule 8.3.3;(f) The configuration change does not alter the Low Carbon Exclusion or Low Carbon Grant status under Rule 3.4.7;(g) Updated Qualification Exhibits being provided for the CMU as required;

Prequalification and Assurance (continued)

Proposed Legal Text [CMAG #8)

- (h) For a CMU that has passed the Evidence of Total Project Spend:
 - i. A declaration that the CMU components being removed will not be used to ensure that a different CMU meets CAPEX thresholds for longer agreements
[DQ: As discussed, we believe this is too restrictive]
- (i) For a CMU that has not passed the Evidence of Total Project Spend:
 - i. A declaration that the CMU components being added have not been used to ensure that a different CMU meets CAPEX thresholds for longer agreements
[DQ: As discussed, we believe this should be covered by an ITE report]

Secretariat Review

The intent of the above is to ensure any Reconfiguration/Reallocation does not adversely impact the pertinent CMUs original Prequalification Results.

The CMAG #8 proposed 4.4.4B (as above) attempts to achieve that objective by being very specific about the criteria, rather than rely on a simple statement of principle.

CP372 'Change to Rule 4.4.4'– Implications

The following implications were considered at CMAG Meeting 10.

Area	Implication	CMAG Response
Satisfactory Performance Days and Demonstrating Extended Performance	If a Component is Reconfigured or Reallocated within a Delivery Year, would SPDs (and Extended Performance Test where applicable) need to be completed again with the new configuration?	SPDs prove De-rated Capacity, there is no reason to re-complete SPDs as original CP372 does not allow a Reconfiguration to change De-rated Capacity. [New] However, new analysis as raised above: <ul style="list-style-type: none">• De-rated Capacity of a CMU can already be increased, in some circumstances, within 18 months of DY1 start.• Should an increase in De-rated Capacity be allowed in other circumstances?• Reallocation of Components could give rise to the need for new tests depending on the specific of removed and added Components and the timing around tests on previous and current CMUs.
Metering Aggregation and Metering Test certificates	Issued at a CMU level, would any component changes within a Delivery Year require re-completion of appropriate metering assessment and testing, for the whole CMU or just the Component?	A CMU should only be required to complete appropriate metering assessments and tests for a Reconfigured Component with a change of metering or an Added Component that had not previously been subject to Metering Assessment or Test This also aligns with the current process for DSR Component Reallocation, with appropriate deadlines and Baseline Estimates for Storage Facilities.

CP372 'Change to Rule 4.4.4' – Implications

The following implications were considered at CMAG Meeting 10 (continued).

Area	Implication	CMAG Response
Number of changes / cut-off for changes	Should there be a limit on the number of changes a CMU can make to its configuration? Should there be a deadline on when configuration changes to Generating Units could be made by?	The assurance process within the CM Rules will naturally apply deadlines for configuration changes to be completed by. A limit on changes can be considered if justified e.g. EMR DB limitations to complete required assurance and due process.
Component Register	To have effective control over Component Reallocation it is necessary to have a Register of unique Components.	Such a register could be implemented as part of the DB/CMSB proposals for moving Metering and Component Reallocation responsibilities from DB to CMSB. [New] Analysis since CMAG #10 Information to be stored: <ul style="list-style-type: none">• Component configuration history, including plant, metering and connection capacity;• Location history;• Linked CMUs;• Apportioned Project Spend;• Apportioned Funding declarations;• Metering, SPD and EPC tests.

CP372 - Standard Questions

- Does CP372 further the CM Rules Change Objectives and/or Ofgem's Principal Objectives?

Ofgem Principal Objective

'protect the interests of existing and future consumers in relation to gas conveyed through pipes and electricity conveyed by distribution or transmission systems. The interests of such consumers are their interests taken as a whole, including their interests in the reduction of greenhouse gases in the security of the supply of gas and electricity to them and in the fulfilment by the Authority...

CM Rules Change Objectives

- a) Promoting investment in capacity to ensure security of electricity supply
- a) Facilitating the efficient operation and administration of the Capacity Market
- a) Ensuring the compatibility of the Capacity Market Rules with other subordinate legislation under Part 2 of the Energy Act 2013

Proposer View

- This proposal would primarily facilitate more efficient operation and administration of the Capacity Market, and would result in lower costs for consumers due to more effective CMU management.

CP362 'CM AGREEMENT TRANSFERS' – WATERS WYE ASSOCIATES

Issue and Proposed Solution

What is the Issue?

- Rule 9.2.5 (a) (i) prohibits a CMU from secondary trading until it has reached the Significant Completion Milestone (SCM)

What is the Proposed Solution?

Amend Rule 6.7.1 and 9.2.5(a)(i) to allow secondary trading ahead of SCM.

- As per the e-mail circulated to CMAG Member on 3 August 2023
- Two different sets of legal text have been developed for CP362 currently. These are:
 - 1) Lisa's original legal text which simply deletes Rule 9.2.5 (a)(i)
 - The intent of this proposal is detailed in the Change Proposal form and is intended to allow developers that have delivery issues and have not met their Substantial Completion Milestone (SCM) to trade the agreement to a capacity market participant who can deliver it.
 - 2) An alternative set of legal text developed by Raoul and Lisa.
 - This alternative legal text was developed by Raoul and Lisa following discussions at CMAG Meeting 7 to address concerns raised by EMR-DB that without amendments to Rule 6.7.1 a CMU would not be able to trade out of its obligation until it has completed its SCM which would undermine the initial intention of the proposal.
 - Additionally, the revised legal text sought to remove an inconsistency, whereby the SCM test for Secondary Trading in Delivery Years 2 & 3 was predicated on achieving SCM before the Prequalification Results Day for the relevant Delivery Year.

CP362 - Different Solution Options & Legal Text Update

- Following further analysis of both sets of legal text we do not believe that either option satisfies the initial intention of the proposal whilst not impacting DESNZ policy intent. The rationale for this is given below:

Existing Legal Text Option	Redlining	CMAG Secretariat Comment
<p>1. Lisa's original legal text which simply deletes Rule 9.2.5 (a)(i)</p>	<p>9.2.5 Transfers of a Capacity Agreement:</p> <p>(a) under Rule 9.2.4(a) can only be effected on the Capacity Market Register after the T-1 Auction for the relevant Delivery Year has concluded (or, in the case of an SA Agreement, after 30th May 2017) and provided that:</p> <p>(i) — in the case of a Prospective Generating CMU and its second or third Delivery Year, it has achieved the Substantial Completion Milestone by the Prequalification Results Day for the T-1 Auction for that Delivery Year;</p>	<p>During CMAG Meeting 5 (Section 10.11) and 6 DESNZ, Ofgem and DB confirmed their policy intent and interpretation that such Prospective CMUs should not be allowed to trade until the Transferor CMU had met its SCM.</p> <p>The key benefit of this policy being thought to be the prevention of speculative applications winning Capacity Agreements, with no intention of delivering additional generating capacity, but instead to trade away their Capacity Obligation.</p> <p>This means this proposed legal text, removing Rule 9.2.5(a)(i), would not deliver policy intent and also not clearly deliver Secondary Trading before SCM for any DY.</p>
<p>2. An alternative set of legal text developed by Raoul and Lisa</p>	<p><i>Amend paragraph 6.7.1 to read as follows:</i></p> <p>A Capacity Provider is not liable for, or entitled to, any payments in respect of a particular CMU if the relevant System Stress Event precedes the date on which the Substantial Completion Milestone for such CMU is reached. This Rule shall not apply to any Transferred Part of a Capacity Agreement relating to a Prospective CMU which has been transferred in accordance with Chapter 9.</p> <p><i>Amend paragraph 9.2.5 to read as follows:</i></p> <p>9.2.5 Transfers of a Capacity Agreement:</p> <p>(a) under Rule 9.2.4(a) can only be effected on the Capacity Market Register after the T-1 Auction for the relevant Delivery Year has concluded (or, in the case of an SA Agreement, after 30th May 2017) and provided that:</p> <p>(i) notwithstanding Rule 6.7.1, in the case of a Prospective Generating CMU's and its Capacity Obligations for its second or third Delivery Years only, it has achieved the Substantial Completion Milestone by the Prequalification Results Day for the T-1 Auction for that Delivery Year;</p>	<p>The alternative text does not address:</p> <ul style="list-style-type: none"> a lack of clarity over Secondary Trading in Delivery Year 1; where the Long Stop Date (LSD) is extended by Rule 6.7.7 beyond Delivery Year 3; CMUs meeting the Minimum Completion Requirements (MCR) instead of SCM; and CMUs meeting MCR in the 120WD period after issue of a Notice of Intention to Terminate.

CP362 - Different Solution Options & Legal Text Update

Following this analysis we have developed three different solution options for CMAG Members to consider.

Option A – Secondary Trade only once a Prospective CMU “becomes effective” (i.e. SCM or MCR)

Redlining	CMAG Secretariat Comment
<p>6.7.1 A Capacity Provider is not liable for, or entitled to, any payments in respect of a particular CMU if the relevant System Stress Event precedes the date on which the Substantial Completion Milestone for such CMU is reached Capacity Agreement becomes effective.</p> <p>9.2.5 Transfers of a Capacity Agreement:</p> <p>(a) under Rule 9.2.4(a) can only be effected on the Capacity Market Register after the T-1 Auction for the relevant Delivery Year has concluded and provided that:</p> <p>(i) in the case of a Prospective Generating CMU and its second or third Delivery Year, it has achieved the Substantial Completion Milestone by the Prequalification Results Day for the T-1 Auction for that Delivery Year, its Capacity Agreement has become effective; and</p> <p>(ii) in the case of a Prospective Interconnector CMU in relation to which a Capacity Agreement has been awarded for a Delivery Year (“Y”) as well as for either or both of the two immediately following Delivery Years Y+1 and Y+2, and in respect of either of the latter two Capacity Agreements, it has achieved the Substantial Completion Milestone by the Prequalification Results Day for the T-1 Auction for Delivery Year Y+1 or Y+2 as the case may be, its Capacity Agreement has become effective; and...</p>	<p>This maintains the principal of the current policy intent.</p> <p>The proposed text relies on the effective date being from Auction, SCM under Rule 6.7.4(a)(ii) or MCR under Rule 6.8.5. Otherwise those details could be specified by additional text in Rule 6.7.1.</p> <p>Similar Rules are there for Prospective Interconnectors.</p>

CP362 - Different Solution Options & Legal Text Update

Following this analysis we have developed three different solution options for CMAG Members to consider.

Option B – ST within the Prospective CMU’s LSD, as long as they have met FCM

Redlining	CMAG Secretariat Comment
<p>6.7.1 A Capacity Provider is not liable for, or entitled to, any payments in respect of a particular CMU if the relevant System Stress Event precedes the date on which the Substantial Completion Milestone for such CMU is reached Capacity Agreement becomes effective.</p> <p>9.2.5 Transfers of a Capacity Agreement:</p> <p>(a) under Rule 9.2.4(a) can only be effected on the Capacity Market Register after the T-1 Auction for the relevant Delivery Year has concluded and provided that:</p> <p>(i) in the case of a Prospective Generating CMU,</p> <p>(aa) its Capacity Agreement has become effective, or</p> <p>(bb) it has met its Financial Commitment Milestone and the trade will be registered before the Transferor CMU’s Long Stop Date; and</p> <p>(ii) in the case of a Prospective Interconnector CMU,</p> <p>(aa) its Capacity Agreement has become effective, or</p> <p>(bb) it has met its Financial Commitment Milestone and the trade will be registered before the Transferor CMU’s Long Stop Date; and...</p>	<p>This varies from the current policy intent and interpretation, but maintains an effective mitigation of the perceived risk that speculative CMUs could be created for use in ‘gaming’ auctions.</p> <p>Objectives:</p> <ul style="list-style-type: none"> Implement CP362 proposal to allow Secondary Trading within the original LSD and before the Capacity Agreement has become effective (by SCM/MCR). Recognise such Prospective CMUs will, for T-4 Capacity Agreements, have achieved their Financial Commitment Milestone (FCM) (under Rule 6.6 and what follows), well before the start of the ST window (T-1 Auction has concluded) so have demonstrated their commitment to the project. For T-1 Capacity Agreements, the FCM must be achieved within 3 months of the Auction conclusion before they can trade. Allow Secondary Trading during the period of any extension in LSD as a result of Rule 6.7.7 connection delays. <p>[NB this last objective would have to change again if CP371 is implemented and used to maintain the term of a Capacity Agreement after the agreement becomes effective, i.e. you can’t both PTCO-out during the delay and still receive Capacity Payments for the full original term.]</p> <p>Please Note: This means that if the CMU’s Capacity Agreement has failed to become effective by the LSD (as possibly extended by Rule 6.7.7 connection delays) and is at risk of Termination, it will no longer be able to ST future DY obligations. This could be seen by DESNZ/ofgem as an appropriate penalty on the CMU for failing to become effective by the LSD.</p> <p>It ignores the potential for the CMU to become effective by meeting MCR during the 120WD window after the Notice of Intent to Terminate, under Rule 6.8.2.</p>

CP362 - Different Solution Options & Legal Text Update

Following this analysis we have developed three different solution options for CMAG Members to consider.

Option C - ST before the Prospective CMU's Capacity Agreement is Terminated

Redlining	CMAG Secretariat Comment
<p>6.7.1 A Capacity Provider is not liable for, or entitled to, any payments in respect of a particular CMU if the relevant System Stress Event precedes the date on which the Substantial Completion Milestone for such CMU is reached Capacity Agreement becomes effective.</p> <p>9.2.5 Transfers of a Capacity Agreement:</p> <p>(a) under Rule 9.2.4(a) can only be effected on the Capacity Market Register after the T-1 Auction for the relevant Delivery Year has concluded and provided that:</p> <p>(i) in the case of a Prospective Generating CMU,</p> <p>(aa) its Capacity Agreement has become effective, or</p> <p>(bb) it has met its Financial Commitment Milestone and has yet to receive a Termination Notice; and</p> <p>(ii) in the case of a Prospective Interconnector CMU,</p> <p>(aa) its Capacity Agreement has become effective, or</p>	<p>Objectives</p> <ul style="list-style-type: none">• Implement CP362 proposal, but allow Secondary Trades before Termination of the Capacity Agreement.

Which of the three options do CMAG Members prefer?

- **Option A – Secondary Trade only once a Prospective CMU “becomes effective” (i.e. SCM or MCR)**
- **Option B – ST within the Prospective CMU’s LSD, as long as they have met FCM**
- **Option C – ST before the Prospective CMU’s Capacity Agreement is Terminated**

Do CMAG Members agree that the legal text presented for their preferred option delivers the intent of the solution?

CP362 STANDARD PROPOSAL QUESTIONS RECAP

CP362 – Previous CMAG response to Standard Proposal Questions

- The following slides summarise the current CMAG response to the standard questions for CP362. These questions and responses are presented for information purposes.
- We will not go through each question and its response but if CMAG Members have any comments or questions on any previously discussed questions now is an opportunity to raise this.

CP362 – Standard Questions Recap

Question	Proposer View
Are there any related changes to the CM Rules in the pipeline?	CP364 and CP369
Does the CP impact on the Regulations?	No
Are there any impacts on any other central industry frameworks or obligations?	No

CP362 – Standard Questions Recap

Question	Proposer Views
<p>Are there any impacts on consumers, and if so, what are the impacts?</p>	<p>Yes. If accepted this change should make the operation of the market more efficient, lowering costs to customers and improving security of supply. Customers have no interest in which generators keep the lights on, they just want to know that the lights are on.</p>
<p>What are the expected impacts on:</p> <p>CM Participants? Delivery Partners?</p>	<p><i>CM Participants?</i> If accepted this rule change will allow parties more options to manage their delivery risks.</p> <p><i>Delivery Partners?</i> For all parties this should increase the probability of all capacity secured in the auction being delivered. This would be a significant improvement over the current arrangements. It should also result in better data on non-delivery and late delivery being available to NGENSO when advising the Secretary of State on future capacity targets for each auction.</p>
<p>What are the expected implementation/enduring costs for:</p> <p>CM Participants? Delivery Partners?</p>	<p><i>CM Participants?</i> This should lower costs to parties.</p> <p><i>Delivery Partners?</i> EMR-DB - Medium - EMR DB has estimated an implementation cost of approximately £150k to implement this change. This includes developing and implementing system, process and guidance changes.</p> <p>LCCC/ESC – None identified</p>

CP362 - Standard Questions Recap

Question	Current CMAG View
Does the CP further the CM Rules Change Objectives and/or Ofgem's Principal Objectives?	<p>Members unanimously agreed CP362 furthered Ofgem's Principal Objective.</p> <p>Members unanimously agreed CP362 is neutral in promoting investment in capacity to ensure security of electricity supply.</p> <p>Members unanimously agreed CP362 is positive in facilitating the efficient operation and administration of the Capacity Market.</p> <p>Members unanimously agreed CP362 is neutral in ensuring the compatibility of the Capacity Market Rules with other subordinate legislation under Part 2 of the Energy Act 2013.</p>

CP362 OUTSTANDING PROPOSAL QUESTIONS

CP362 - Standard Questions

Question	Current CMAG View
Does CMAG agree with the proposed solution? Are there any suitable alternative solutions to address the defect?	TBC – Following discussion at meeting
Does the draft legal text deliver the intention of the solution?	TBC – Following discussion at meeting
What are the expected timescales for implementation?	EMR-DB - It is estimated that it would take two months to implement the change. LCCC/ESC - No implementation requirements identified

CP371 'PROTECTION FROM VERY
LATE NETWORK CONNECTIONS' –
WATERS WYE ASSOCIATES

Issue and Proposed Solution from original CP371

What is the Issue?

- Rule 6.7.7 allows a Capacity Provider to defer the Long Stop Date extended day for day for any delay in achieving the Substantial Completion Milestone that results solely from a failure of a Transmission Licensee or the relevant Distribution Network Operator to provide an active connection point
- Where the TO/DNO delays the connection date by over 1 year, Capacity Providers lose both revenue and effective delivery years from their CM Agreement unfairly

What is the Proposed Solution?

Amend Rule 6.7.7 to account for lost revenue and whole CM Years from an Agreement for a Capacity Provider who has had its connection date delayed by the TO/DNO.

Updated Proposed Legal Text as at CMAG 10

Updates from the original proposed legal text

- Does not allow for Capacity Providers to elect to terminate;
- Clarifies when SCM due to be achieved by; and
- Effectively maintains the duration of Capacity Payments, but only if the connection is delayed by at least 12 months, so the LSD is delayed by at least 1DY

6.7 Achieving the Substantial Completion Milestone

6.7.7 The relevant Long Stop Date must, at the request of the relevant Capacity Provider, be extended day for day for any delay in achieving the Substantial Completion Milestone **by the start of the first Delivery Year of the Capacity Agreement** that results solely from a failure of a Transmission Licensee or the relevant Distribution Network Operator to provide an active connection point when required to do so in accordance with a valid Grid Connection Agreement or Distribution Connection Agreement, including as a result of the failure of their subcontractors (provided that such subcontractor is not the Capacity Provider or in the same Group). To secure such extension, the relevant Capacity Provider must apply to the Delivery Body and provide a report of an Independent Technical Expert substantiating its claim and identifying the relevant number of days of delay.

6.7.10 Where a Capacity Provider has obtained an extension to the Long Stop Date for a CMU under Rule 6.7.7 of at least one whole Delivery Year and has missed out on Capacity Payments solely as a result of those delays in provision of an active connection point delaying when the Capacity Agreement would take effect (under Rules 6.7.4(a) [SCM] or 6.8.4 [MCR]), then:

- a) the term of the Capacity Agreement (as originally set out in a Capacity Agreement Notice and reflected in the Capacity Market Register under Rule 7.4.5(e)) shall be extended by the number of whole Delivery Years by which the Long Stop Date has been extended; and
- b) in order to compensate the Capacity Provider only for the missed Capacity Payments at the start of the Capacity Agreement (solely arising from the delay in provision of an active connection point) the Capacity Payments will cease after the original term of years from the date when the Capacity Agreement became effective. Such Capacity Payments to still be subject to the provisions for suspension of payment or Termination of the Capacity Agreement.

CMAG considered that the change of DYs paid for the Capacity Agreement could be inconsistent with Regulation 31.

CP371 – Mitigations to Delayed Connections

At CMAG Meeting 10, Members highlighted the following issues:

- Are the CM Rules an appropriate means of addressing delayed connections?
 - Members considered if liquidated damages terms within Connection Agreements could address delays. Concern was raised that this would increase the price paid by electricity consumers as liquidated damages paid out would be included in Use of System Charges.
 - Further concern was raised that there is an imbalance of power between Network Operators and Capacity Providers, making negotiating terms such as liquidated damages very difficult.
 - If liquidated damages were more common in Connection Agreements, it could result in more conservative connection dates being offered which would have a negative impact on delivery of new projects and security of supply.

CMAG agreed to consider a number of potential solutions/mitigations that could address delayed connections:

1. An option for multi-year extension of LSD from a single application by the Capacity Provider, including where delayed DNO connections only qualify for extensions once they have, if required, gone through “project progression” so a planned date has been agreed with the TNO.
2. An option to amend Rules around FCM where there is a connection delay.
3. An option (potentially based around CP362) to allow Secondary Trading where the agreement becoming effective has been subject to connection delays.
4. An option to extend the period during which AACO can be increased, having initially been reduced below 100% because of reduced connection capacity.

Option 1: Multi-year extension to LSD

Option 1	Multi-Year Extension to LSD
Objective	Allow a Capacity Provider to submit an Application for LSD extension that is not constrained by evidence of previous actual delay but can explicitly also include an element of future expected delay in obtaining a connection and hence achieving SCM. Only allow an extension where, if required, Project Progression has determined the revised planned Connection date.
Example Scenario	<ol style="list-style-type: none">1. At T-4 Prequalification the Prospective CMU's planned DNO connection was 6 months before the start of the first DY, allowing a 3 month contingency before planned SCM by the start of DY1.2. Construction Reports have subsequently identified delays in expected connection date and pausing of construction.3. At 31/12 in DY1 the connection goes through "project progression" and a new planned connection date of 31/3 in DY4, i.e. a 4 year delay.4. An ITE report is obtained confirming the new planned connection date and attributable 4 year delay in SCM.5. The Capacity Provider submits an application for a 4 year extension in LSD, to the end of DY5.
Proposed Change to Legal Text	6.7.7 The relevant Long Stop Date must, at the request of the relevant Capacity Provider, be extended day for day for any delay in achieving the Substantial Completion Milestone by the start of the first Delivery Year of the Capacity Agreement that results solely from a failure of a Transmission Licensee or the relevant Distribution Network Operator to provide an active connection point when required to do so in accordance with a valid Grid Connection Agreement or Distribution Connection Agreement, including as a result of the failure of their subcontractors (provided that such subcontractor is not the Capacity Provider or in the same Group). To secure such extension, the relevant Capacity Provider must apply to the Delivery Body and provide a report of an Independent Technical Expert substantiating its claim and identifying the relevant number of days of delay. Such extension can include an element of future expected delay in achieving the Substantial Completion Milestone, so long as it is evidenced in the Independent Technical Expert report by a latest planned connection date for the appropriate Connection Agreement, as long as such date for a Distribution Connection Agreement has, where required, been confirmed by Project Progression with the relevant Transmission Licensee.

Option 2: Postpone FCM where there is a Connection Delay (1/3)

Option 2	Postpone FCM where there is a Connection Delay
Objective	Allow FCM target date to be postponed as a consequence of connection delays. If a Prospective CMU has, since prequalification but before FCM, received a planned connection date that has been substantially delayed, then the FCM can be postponed until the day before the first Delivery Year.
Example Scenarios	<ol style="list-style-type: none">1. Assume this proposed extension to FCM only applies to New Build CMUs and then only to Capacity Agreements arising from T-4 Auctions (because a New Build CMU should know of connection delays before the T-1 prequalification).2. Refurbishing CMUs will already have a connection, even if at a lower capacity than required after refurbishment and may already have the fall-back (if they fail to meet FCM) of the Capacity Agreement being reduced to a duration of one DY at its pre-refurbishment capacity. <p><i>Should Refurbishing CMUs still be considered in this option?</i></p>

Option 2: Postpone FCM where there is a Connection Delay (2/3)

Option 2	Postpone FCM where there is a Connection Delay
Proposed Change/Legal Text	<p>New Build CMUs Only</p> <p>6.6A Achieving the Financial Commitment Milestone: New Build CMUs</p> <p>6.6A.1 Other than in the case of a SA Agreement or a T-1 Agreement,</p> <p>(a) if by 11 months after the Auction Results Day the Delivery Body has received an Independent Technical Expert's Report identifying a latest planned connection date (evidenced by a Grid Connection Agreement or a Distribution Connection Agreement) that is at least [x] months later than the planned connection date at prequalification*, then the Capacity Provider may submit an application to the Delivery Body for the Financial Commitment Milestone to be extended, day-for-day, by that delay in the planned connection, but no later than the day before the start of the first Delivery Year of the Agreement.</p> <p>(b) Rule 6.6A.2 applies where in respect of a New Build Capacity Provider ("P") the Delivery Body has not agreed to an extension to the Financial Commitment Milestone under (a) above and has not, by 11 months after the Auction Results Day ("the 11-month period"), received the Independent Technical Expert's report referred to in Rule 6.6.1.</p> <p><i>[DQ The 11 month period should not be amended because it relates to Policy in Reg 59(4) for additional Credit Cover to be lodged from 12 months after ARD.]</i></p>

Option 2: Postpone FCM where there is a Connection Delay (3/3)

Option 2	Postpone FCM where there is a Connection Delay
Proposed Change/ Legal Text	<p>All Prospective CMUs</p> <p>6.6.1 A Capacity Provider of a Prospective CMU will be considered to have met its Financial Commitment Milestone obligation if, by no later than other than in the case of a SA Agreement or a T-1 Agreement, 16 months after the Auction Results Day for the Capacity Auction in respect of which the Capacity Agreement was awarded, (or, if by 11 months after the Auction Results Day the Delivery Body has received an Independent Technical Expert's Report identifying a latest planned connection date (evidenced by a Grid Connection Agreement or a Distribution Connection Agreement) that is at least [x] months later than the planned connection date at prequalification*, then the Capacity Provider may submit an application to the Delivery Body for the Financial Commitment Milestone to be extended, day-for-day, by that delay in the planned connection, but no later than the day before the start of the first Delivery Year of the Agreement, or in the case of an SA Agreement or a T-1 Agreement, 3 months after the Auction Results Day for the Capacity Auction in respect of which the Capacity Agreement was awarded), the Delivery Body has acknowledged receipt of: [(a) ITE and (b) Funding Declaration]</p> <p>6.6A Achieving the Financial Commitment Milestone: New Build CMUs</p> <p>6.6A.1 Other than in the case of a SA Agreement or a T-1 Agreement, Rule 6.6A.2 applies where in respect of a New Build Capacity Provider ("P") the Delivery Body has not agreed to an extension to the Financial Commitment Milestone under 6.6.1 and has not, by 11 months after the Auction Results Day ("the 11-month period"), received the Independent Technical Expert's report referred to in Rule 6.6.1.</p> <p>6.6A.2 Where this Rule 6.6A.2 applies, the Delivery Body must notify P and the Settlement Body that P must provide an increased amount of Applicant Credit Cover in accordance with Regulation 59(4) and (5).</p> <p>6.6A.3 The notices under Rule 6.6A.2 must be given within 10 Working Days after the end of the 11 month period.</p>

Option 3: Allow Secondary Trading before SCM (CP362 – CM Agreement Transfers)

Option 3	Allow Secondary Trading before SCM (CP362 – CM Agreement Transfers)
Objective	CP362 seeks to allow a Prospective CMU to secondary trade before it has achieved SCM/MCR.
CP362 Options	Option A – Secondary Trade only once a Prospective CMU ‘becomes effective’ (i.e. SCM or MCR) This maintains the principal of the current policy intent. The proposed text relies on the effective date being from Auction, SCM under Rule 6.7.4(a)(ii) or MCR under Rule 6.8.5. Otherwise those details could be specified by additional text in Rule 6.7.1. Similar Rules are there for Prospective Interconnectors.
	Option B – Secondary Trade within the Prospective CMU’s LSD, as long as they have met FCM This varies from the current policy intent and interpretation, but maintains an effective mitigation of the perceived risk that speculative CMUs could be created for use in ‘gaming’ auctions. Allow Secondary Trading during the period of any extension in LSD as a result of Rule 6.7.7 connection delays. Please Note: This means that if the CMU’s Capacity Agreement has failed to become effective by the LSD (as possibly extended by Rule 6.7.7 connection delays) and is at risk of Termination, it will no longer be able to ST future DY obligations. This could be seen by DESNZ/Ofgem as an appropriate penalty on the CMU for failing to become effective by the LSD. It ignores the potential for the CMU to become effective by meeting MCR during the 120WD window after the Notice of Intent to Terminate, under Rule 6.8.2.
	Option C – Secondary Trade before the Prospective CMU’s Capacity Agreement is Terminated Implement CP362 proposal, but allow Secondary Trades before Termination of the Capacity Agreement.

Option 4: Extend the period during which Capacity can be increased under Rule 6.7.6

Option 4	Extend the period during which Capacity can be increased under Rule 6.7.6
Objective	Allow for Capacity to be increased as a consequence of delayed connection, by amending Rule 6.7.6 to refer to the LSD rather than start of DY1.
Example Scenario	<ol style="list-style-type: none">1. A Prospective CMUs' connection is delayed meaning achieving SCM is delayed, allowing the LSD to be extended under Rule 6.7.7.2. When a connection is provided it is initially at a capacity significantly less than planned, such that the CMU only achieves MCR and Capacity Payments commence based on that reduced capacity.3. However, within 6 months of the LSD, the connection's capacity is increased to that originally planned and the Agreement returns to its original AACO from that date – with Capacity Payments increasing accordingly.
Proposed Change to Legal Text	6.7.6 At any time up to eighteen six months after the start of the first Delivery Year Long Stop Date of the Capacity Agreement, a Capacity Provider may notify the Delivery Body that a Generating Unit forming part of a Prospective Generating CMU has increased its Operational physical capacity such that it is now sufficient to deliver a higher proportion (up to but not exceeding 100 per cent) of its Capacity Obligation, and the updated Capacity Agreement will take effect from such date with respect to that increased proportion.
Note	The above proposed change does not apply to Prospective Interconnectors in Rule 6.7.6A, where increase in capacity is allowed within the DY of a Capacity Agreement.

CP371 – Standard Proposal Questions

Question	Proposer View
Are there any related changes to the CM Rules in the pipeline?	CP362, noted on the previous slide.
Does the CP impact on the Regulations?	<p>The original proposed legal text included elective terminations that would require a change to the Regulations.</p> <p>The CMAG 10 proposed legal text change included changing the DYs for which a Capacity Agreement would be paid and thus could be considered inconsistent with Regulation 31. DESNZ/ofgem to determine if inconsistent with Policy intent</p> <p>The alternative legal text options set out above are considered consistent with Regulations.</p>
Are there any impacts on any other central industry frameworks or obligations?	The Proposer and CMAG Secretariat have not identified any impacts.

CP371 - Standard Proposal Questions

Question	CMAG View/Options
Are there any impacts on consumers, and if so, what are the impacts?	To be determined by CMAG.
What are the expected impacts on: CM Participants? Delivery Partners?	Does the CMAG wish to request an Impact Assessment from LCCC/ESC or DB? If not, what are the impacts? Does the CMAG need to consult to determine the possible CM Participant impacts? If not, what are the impacts on CM participants?
What are the expected implementation/enduring costs for: CM Participants? Delivery Partners?	Does the CMAG wish to request an Impact Assessment from LCCC/ESC or DB? If not, what are the impacts? Does the CMAG need to consult to determine the possible CM Participant impacts? If not, what are the impacts on CM participants?

CP371 - Standard Proposal Questions

Question	CMAG View – Yes, Neutral or No
Do you agree the Proposer’s legal text addresses the issue?	TBC
Is the Proposer’s legal text the preferred solution?	TBC
Has the CMAG identified any alternative solutions?	TBC
If there are multiple alternative solutions which is the CMAG preferred alternative solution?	TBC
Do you agree the preferred alternative legal text addresses the issue?	TBC
Does the CMAG prefer the alternative legal text over the Proposer’s legal text?	TBC
Is there a recommended implementation date for most effective delivery of the preferred solution?	TBC

CP371 - Standard Questions

- Does CP371 further the CM Rules Change Objectives and/or Ofgem's Principal Objectives?

Ofgem Principal Objective

'protect the interests of existing and future consumers in relation to gas conveyed through pipes and electricity conveyed by distribution or transmission systems. The interests of such consumers are their interests taken as a whole, including their interests in the reduction of greenhouse gases in the security of the supply of gas and electricity to them and in the fulfilment by the Authority...

CM Rules Change Objectives

- a) Promoting investment in capacity to ensure security of electricity supply
- a) Facilitating the efficient operation and administration of the Capacity Market
- a) Ensuring the compatibility of the Capacity Market Rules with other subordinate legislation under Part 2 of the Energy Act 2013

Proposer View

- We believe our proposal would primarily facilitate more efficient operation and administration of the Capacity Market, and would result in lower costs for consumers.

CP371 – CMAG Recommendations

The CMAG recommends to Ofgem:

- That CP371 better facilitates Ofgem's Principal Objective;
- That CP371 better facilitates the CM Rules Change Objectives:
 - a) Promoting investment in capacity to ensure security of electricity supply
 - b) Facilitating the efficient operation and administration of the Capacity Market
 - c) Ensuring the compatibility of the Capacity Market Rules with other subordinate legislation under Part 2 of the Energy Act 2013
- The draft legal text; and
- That CP371 should be **approved**.



INDUSTRY FEEDBACK



GOVERNMENT POLICY IMPACTS SESSION



CMAG FORWARD WORKPLAN

CMAG Forward Plan

Key changes from last meeting:

- Removed Secondary Trading Issue Areas – Trading Eligibility & Agreements and Obligations Risk
- Removed Review of Rule 4.4.4 as it has been superseded by CP372
- Added CP372 with estimated timeline
- Extended dates for CP362, CP364 and CP369 to reflect actual development time
- Added CPTBC 'Delivery Body and Settlement Body Metering Process & DSR Component Reallocation

Title	2023							2024		
	June	July	August	September	October	November	December	January	February	March
CP366 - Definition of Total Project Spend	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem
CP365 - ITE Reporting Requirements	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem
CP364 - Allow Secondary Trading from T-4	Development	Development	Development	Development	CMAG Recommendation	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem
CP363 - Changes to EMR Delivery Body Portal	On hold	On hold	On hold	On hold	On hold	On hold	On hold	On hold	On hold	On hold
CP362 - CM Agreement Transfers	Development	Development	CMAG Recommendation	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem
CP356 - Facilitate Secondary Trading before CMU Termination	On hold	On hold	On hold	On hold	On hold	On hold	On hold	On hold	On hold	On hold
CP368 - CVR Publication and CMVRN Submission Deadlines	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem
CP369 - Secondary Trading with CMU Metering Aggregation Rules	Development	Development	CMAG Recommendation	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem
CP370 - Changes to Extended Performance Test	On hold	On hold	On hold	On hold	On hold	On hold	On hold	On hold	On hold	On hold
CP371 - 'Management of connection delays by network companies'	Initial Consideration	Development	Development	Development	CMAG Recommendation	With Ofgem	With Ofgem	With Ofgem	With Ofgem	With Ofgem
CP372 - 'Change to Rule 4.4.4'	On hold	Initial Consideration	Development	Development	Development	Development	Development	CMAG Recommendation	With Ofgem	With Ofgem
CPTBC - 'Delivery Body and Settlement Body Metering Process'	On hold	On hold	Initial Consideration	Development	Development	Development	CMAG Recommendation	With Ofgem	With Ofgem	With Ofgem
DSR Component Reallocation	On hold	On hold	On hold	Development	Development	On hold	On hold	On hold	On hold	On hold

Key	
Initial Consideration	Initial Consideration
Development	Development
CMAG Recommendation	CMAG Recommendation
With Ofgem	With Ofgem
On hold	On hold



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