

Capacity Market Advisory Group Final Minutes

Meeting number **12**

Venue **Elexon Offices/MS Teams**

Date of meeting **21 September 2023 10:00-16:00**

Classification **Public**

Attendance and apologies

Attendees	Initials	Type
Brian Lake	BL	Member
Claire Sedgwick	CS	Member
Eleanor Haynes	EHay	Member
Richard Thwaites	RiT	Member
Mark Duffield	MD	Member
Paul Jones	PJ	Member
Raoul Thulin	RT	Member
Ash Yamir	AY	Representative (DESNZ)
Sarah Howarth	SH	Representative (DESNZ)
William Farquhar	WF	Representative (DESNZ)
Beth Hanna	BH	Representative (EMR Delivery Body)
Stuart Wells	SW	Representative (EMR Delivery Body)
Bir Virk	BV	Representative (CM Settlement Body)
Ross Haigh	RH	Representative (CM Settlement Body)
Andrew Macdonell	AM	Representative (Ofgem)
Lisa Waters	LW	Guest (Waters Wye Associates)
Tom Guilfoyle	TG	Guest (FRV)
Andrew Lam	AL	Guest (FRV)
Kathryn Gay	KG	Guest (EMRS)
Elliott Harper	EH	CMAG Facilitator (Elexon)
Amy Stackhouse	AS	CMAG Secretariat (Elexon)
Chris Arnold	CA	CMAG Secretariat (Elexon)
Phillip Paul	PP	CMAG Secretariat (Elexon)
Lawrence Jones	LJ	Elexon (part meeting)

Apologies

Attendance and apologies

Sarah Honan	SH	Member
Sophie Lethier	SL	Member

1. Welcome and Apologies

- 1.0 Elliott Harper (EH) welcomed Members and Representatives and noted apologies from Sophie Lethier (Energy UK), and Sarah Honan (ADE) with Claire Addison attending as Alternate.

2. CM Representative Updates

CM Settlement Body (CMSB)

- 2.0 CMSB noted they are hosting an industry event on 19 October 2023 to provide an update on the next mock stress event.

Ofgem

- 2.1 Ofgem noted that they will be launching their Statutory Consultation, following the outputs of this CMAG meeting.
- 2.2 Ofgem further noted there are three CM Rules Change Proposals with them currently ([CP365](#), [CP366](#) and [CP368](#)); as CP365 and CP366 overlap with DESNZ, Ofgem remains in discussion with the Proposer to agree the best route forward.

EMR Delivery Body (EMR DB)

- 2.3 EMR DB noted that the prequalification submission window has now closed, and the EMR DB team will be working through the applications over the next month which may take resource away from other areas.
- 2.4 EMR DB noted they are aware of a slowdown of the Portal and intermittent performance that could have impacted Customers. LW highlighted the Portal failed for five hours on a day, and was running slow for a further four days and no additional time was provided for prequalification submission which had a resource impact on many Capacity Providers. EMR DB noted the feedback.
- 2.5 A Member queried whether there will be a formal feedback request from EMR DB regarding the prequalification submission process. EMR DB noted any feedback should be sent to EMR DB (box.emr.pregual@nationalgrideso.com), as a formal feedback request will be issued later in the year.
- 2.6 LW noted the requirement to use a different login and email address in the Portal for each CMU is difficult to manage for many Capacity Providers and their agents, and has been highlighted to EMR DB previously. EMR DB noted they are reviewing this within the development of the new Portal and will provide an update on any solutions to CMAG.
- 2.7 **NEW ACTION 0923/01 - The EMR DB representative to provide an update to CMAG on whether it will be possible for users to view their PIN as they enter it in the new Portal.**

Department for Energy Security and Net Zero (DESNZ)

- 2.8 DESNZ noted following the No.10 announcement, on 20 September 2023 on the approach to Net Zero, the key update for CMAG is that connection and network delays are a priority for government and DESNZ will seek to keep the CMAG updated when more information is available.
- 2.9 DESNZ highlighted the next five-year review of the CM will be due by July 2024, and CMAG Members should expect a Call for Evidence to be issued within the next month.
- 2.10 LW noted that with the CM Rules changes implemented this year by DESNZ, there were inconsistencies and issues created, specifically around the changes to Transmission Entry Capacity (TEC) that has caused disruption to Capacity Providers entering the CM this year. DESNZ noted the feedback.
- 2.11 A Member noted it was unclear from the Rules how long an Extended Performance Test (EPT) needs to be, and this is also not consulted on by the EMR DB. The EMR DB agreed it was unclear and they would seek to provide further clarity on this to CMAG.

2.12 DESNZ noted they are reviewing storage as part of their phase 2 review alongside Review of Electricity Market Arrangements (REMA) developments.

3. CMAG Secretariat Update

3.0 The CMAG Secretariat noted they are seeking CMAG feedback on how meeting materials are circulated, the Secretariat recommended that they are made available via the CMAG Website only. CMAG supported this alternative approach subject to being notified by email when updates are made to meeting materials.

3.1 The CMAG Facilitator noted they would be circulating a survey requesting positive and constructive feedback from CMAG, to inform the next six-monthly report and highlight areas of improvement.

3.2 The CMAG Facilitator (EH) informed CMAG that he would be leaving Elexon at the end of October 2023, and Lawrence Jones would be facilitating CMAG on an interim basis.

4. Developing CM Rules Change Proposal CP373 'Aggregation, Metering and DSR Component reallocation process transfer' CMSB and EMR DB

4.0 The CMAG Secretariat noted a walkthrough of the legal text for CP373 was held on Thursday 7 September 2023.

4.1 Ofgem noted they were reviewing internally with their legal team whether Ofgem can action disputes relating to the CM Metering Register (CMMR); if this is not possible then an alternative resolution for how this can be achieved may be included within the solution by Ofgem before statutory consultation.

4.2 A Member queried whether the 28-day limit on when appeals to factual inaccuracy within the CMMR can be raised is appropriate. CMSB agreed to review the legal text to ensure any appeals to factual inaccuracy align with the process for the Capacity Market Register.

4.3 A Member questioned what the consequences are of a Capacity Provider not submitting Meter Point Asset Numbers (MPANs) for a site, in relation to non-operational opt-out under Rule 3.11. CMSB noted Rule 3.11 supports compliance with 3.11.2, which requires the CMSB to inform the EMR DB of instances where a non-operational opt-out CMU provides electricity during a relevant winter period.

4.4 A Member noted the instances of "as soon as reasonably practicable" within the legal text should be updated to a stated deadline for clarity. EMR DB noted they understand the distinction that for interactions between CMSB and EMR DB, a deadline of reasonably practicable is suitable but for Capacity Providers a distinct deadline is most appropriate and would update the legal text to reflect this.

4.5 A Member queried what would happen if the CP373 solution is not implemented in time for the new Portal rollout. EMRS noted they are currently working on ensuring the solution is able to be implemented in time, but will have an interim solution available if needed and will ensure this is as simple as possible for Capacity Providers.

4.6 CMAG Members unanimously agreed to recommend to Ofgem that:

- a) CP373 is neutral to Ofgem's Principal Objective;
- b) CP373 better facilitates the efficient operation and administration of the Capacity Market;
- c) Implementation as soon as practicable; and
- d) CP373 should be approved, subject to the legal text being updated as per the above comments and reviewed ex-committee.

5. Developing CM Rules Change Proposals CP372 'Change to Rule 4.4.4' – CMAG

5.0 The CMAG Secretariat provided a recap of CP372, and noted that CMAG Members were requested to review the specific change proposal questions ex-committee. Three responses were received in total, which established there is an issue to address through the CM Rules but the scope could benefit from further definition.

For a Generating Unit (Component) what constitutes Maintenance, Reconfiguration, and Refurbishment?

5.1 The CMAG Secretariat noted responses varied by Generating Technology Class (GTC) and a matrix of maintenance; reconfiguration and refurbishment examples by GTC would be beneficial to determine the scope of which a change can be drafted.

- 5.2 CMAG Members agreed that additional views from industry experts representing different GTC would be helpful to determine the various scenarios of which a change would need to address.
- 5.3 A Member noted clarity is needed on what is considered a change to configuration, for example it is not clear if cell refresh for batteries would be considered configuration.
- 5.4 A Member noted that changing a component, within the same GTC, could have an impact on a Capacity Provider's construction plan if they have already met their construction milestones; this would need to be taken into consideration.

What De-rating Factor (DF) should be used for Components added to a CMU? What DF should be used for a change in Generating Technology Class reconfiguration of a Component?

- 5.5 The CMAG Secretariat noted there was a consensus amongst responses that when relating to an original GTC the Agreement DF should be used, but for a change in GTC the latest DF for the Delivery Year (DY) would be appropriate.
- 5.6 A Member noted their view is that the DF should align with that in the original Agreement, even where there is a change in GTC.
- 5.7 A Member noted using the latest DF is appropriate as they change each year due to each GTC contribution to security of supply in the CM, which changes over time.
- 5.8 Ofgem noted they are aware of some complications relating to Rule 2.3.3 and DF and will provide an update on their view at the next CMAG Meeting.
- 5.9 A Member noted the way DF are applied must be consistent between Acceptable Transferees, Secondary Trading Entrants and any change under Rule 4.4.4.
- 5.10 Ofgem queried if by changing the DF, would there be an unintended consequence of a CMU choosing a more favourable DF by carrying out a change of GTC. A Member noted as the Auction Acquired Capacity Obligation (AACO) must remain the same, this should not be a consequence.
- 5.11 A Member noted a wider review of policy direction and intent is required from DESNZ to understand how a change in this area can proceed.

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?

- 5.12 The CMAG Secretariat noted in some cases Members considered additional capacity could be separately metered and become a separate Capacity Market Unit (CMU). However, where this is not possible, the idea of increased capacity allowing Physically Traded Capacity Obligation (PTCO)-in has not been addressed and will need to be considered by CMAG

What happens regarding a CMU's FCM if a Component is reallocated away from it after passing FCM? 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?

- 5.13 The CMAG Secretariat noted there was a lack of consensus amongst responses, and CMAG will need to consider specific scenarios by GTC to determine how to proceed.

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?

- 5.14 The CMAG Secretariat noted responses showed a consensus that spend on a Component that moves to a different CMU should not be 're-used' for that CMU, however, scenarios may need to be considered in order to draft effective changes to legal text.

Should changes be allowed within a Delivery Year, i.e. after the start of the first DY of an Agreement?

- 5.15 The CMAG Secretariat noted responses indicated that changes should be allowed within a DY, to be most effective.

What additional assurances are required for component changes made within a DY?

The CMAG Secretariat noted responses highlighted that a change must ensure that any change to configuration does not adversely impact the original CMU meeting its Extended Years Criteria or the prequalification result.

- 5.16 A Member noted this change is more convoluted than deleting Rule 4.4.4, allowing Capacity Providers to change their GTC can have a large impact on CM and needs to be considered how this can be achieved. The Member further noted CMAG needs to break down the scenarios it is trying to resolve through this change and tailor the solution to resolve these as not all issues raised will be resolved through a change to configuration.
- 5.17 A Member noted there is an overlap with work DESNZ is seeking to do as part of their Phase 2 on decarbonising the CM, but there may be some quick wins CMAG can achieve in terms of providing clarity on what current policy intent is on battery augmentation.
- 5.18 **NEW ACTION 0923/01 - The CMAG Secretariat to seek wider industry expert views on the Specific Change Proposal Questions for CP372 'Change to Rule 4.4.4'.**

6. Developing CM Rules Change Proposal CP371 'Protection from Very Late Network Connections' – Waters Wye Associates

- 6.0 The CMAG Secretariat provided a recap of the issue and solution for CP371 and noted following the last meeting, Option 2 has been redrafted to require a director's letter as proof of connection delay.
- 6.1 The CMAG Secretariat provided a recap of Option 1, noting it had not changed since the last meeting. Members did not have any further comments.
- 6.2 The CMAG Secretariat noted that Option 2 has been updated to require a letter from two Directors as proof of a connection delay. The CMAG Secretariat further noted that through their review, it was highlighted that meeting Financial Completion Milestone (FCM) and extending Long Stop Date (LSD) both require an Independent Technical Expert (ITE) report, but the July 2023 Rule changes included dropping the need for an ITE report when there were material changes in construction progress reports. Given the concerns raised over ITE reports at the last CMAG the proposed change to the legal text for option 2 has been to settle on a Directors' certificate (evidenced by updates connection agreements).
- 6.3 The CMAG Secretariat queried whether there should be a minimum connection delay in order for Option 2 to come into effect. A Member noted there is no need for a minimum, practically a Capacity Provider would not use this solution if they have a very minimal delay but it will allow for flexibility for Capacity Providers to make that decision based on their risk appetite. LW noted the policy intent is that Capacity Providers are entitled to the length of the Capacity Agreement they are awarded and should receive payments for this period, without a minimum requirement for delay.
- 6.4 The CMAG Secretariat queried whether Option 2 should apply to both New Build and Refurbishing CMUs. CMAG Members agreed Option 2 should apply to all CMUs, including Refurbishing CMUs.
- 6.5 The CMAG Secretariat queried whether requiring a director's certificate is appropriate. A Member noted they believed this would provide sufficient assurance and is used in other circumstances within the Rules as sufficient evidence. A Member queried if a Capacity Provider with only one director would be able to make use of the solution as drafted. The CMAG Secretariat noted although it refers to two directors within Option 2, Rule 1.3A makes provision for companies with only a sole director to be sufficient. A Member asked what an 'officer' is in the Rules and if this needs to be defined to be clearer. Another Member noted local authorities may also participate in the CM and would have an officer rather than director.
- 6.6 A Member noted Regulation 61 states the credit cover is drawn down 18 months after the Agreement is awarded, this is usually returned after completion of FCM or otherwise at 18 months it is drawn down and forfeited; so there could be a potential problem with extending the FCM past 18 months. The CMAG Secretariat agreed to review Option 2 and Regulation 61 to ensure there is no conflict between the two. The CMAG Secretariat queried if CMAG would still want the option of delaying FCM to avoid termination if it could result in having their credit cover drawn down at 18 months as a result. A Member noted the Regulation should be changed, as the draw-down of credit cover is related directly to a termination event which is what Option 2 is seeking to mitigate. EMR DB noted that Regulation 61(b) has since been revoked, this may not be clear due to the unconsolidated Regulations displayed, but this may resolve the issue discussed.
- 6.7 The CMAG Secretariat noted Option 2 would need to be reviewed and possibly redrafted as per the discussion at the Meeting, an update will be presented at the next Meeting.
- 6.8 The CMAG Secretariat noted that Option 3 refers to CP362 'CM Agreement Transfers', CMAG have since made a recommendation to take forward CP362 with an alternative solution. LW noted that whilst secondary trading will help where there are DNO delays, it will not help with TNO delays that are significantly larger connections and Agreements.

- 6.9 The CMAG Secretariat presented Option 4 and noted this had not changed since presented at the last meeting. A Member noted if a Capacity Provider can increase their capacity up to their maximum obligation at any point, why is there a limit of 18 months after the start of the first Delivery Year to allow this and notify the EMR DB. EMR DB noted this could be so that the capacity could be accounted for in T-1 calculations but would review this. A Member noted it would not be in consumer's interest to allow for a Capacity Provider to increase their capacity without a limit to notify the EMR DB as it could impact T-1 Auction setting and prices.
- 6.10 LW noted they do not believe the Regulations stop the initial intent and solution of CP371, as under the Regulations, Ofgem can direct a change to a Capacity Provider's Agreement as the outcome of an appeals process; if a Capacity Provider can prove they have a connection delay can the rules be changed to make such a delay the subject of an appeal to amend their agreement?, the EMR DB should be able to send a request to Ofgem to direct a change to the Capacity Agreement in line with the delay.
- 6.11 The CMAG Secretariat queried whether CMAG wish to take forward any/all of the mitigation options presented as an alternative solution for CP371.
- 6.12 CMAG Members agreed unanimously with Option 1, 2 Members abstained.
- 6.13 CMAG Members agreed unanimously with Option 2.
- 6.14 CMAG Members agreed unanimously with Option 4, with one Member noting this was subject to a limit on the period at which a Capacity Provider must notify the EMR DB of an increase in its capacity.
- 6.15 The CMAG Secretariat presented the standard CM Rules Change Proposal questions to CMAG for consideration.

Are there any impacts on consumers, and if so, what are the impacts?

- 6.16 A Member noted CP371 will reduce the risk of participating in the CM, and will result in less risk priced into Capacity Agreements so in the long-term this should help to reduce the price of CM on consumers.
- 6.17 LW noted CP371 de-risks the CM and will have a positive impact on consumers; it is their opinion the original proposed solution will have a larger positive impact than the alternative.
- 6.18 A Member noted this is dependent on whether the Agreement's DYs can be extended, as consumers will continue to pay for these extended Agreements in later years.

What are the expected impacts and implementation/enduring costs on Delivery Partners?

- 6.19 The Delivery Partners did not identify any significant impacts but agreed to review if a formal impact assessment would be required.

What are the expected impacts and implementation/enduring costs for CM Participants?

- LW noted this will reduce the risk of participating in the CM for Capacity Providers which will allow for better security of supply; it will also instil confidence in the CM which will lead to increased investment.
- 6.20 A Member queried if CP371 would apply retrospectively if implemented. LW noted it would be helpful to have clarity on what changes could be applied retrospectively and what can't.
- 6.21 **NEW ACTION 0923/02 - The CMAG Secretariat and Ofgem to discuss and consider whether the CP371 solution could be applied to existing agreements if implemented, and clarify how application to existing agreements could apply to other CM Rules Change Proposals.**
- 6.22 **NEW ACTION 0923/03 - The Ofgem representative to confirm if, under Regulation 31(3) (b), they are able to amend the Delivery Year for which an Agreement relates.**
- 6.23 **NEW ACTION 0923/04 - The CMAG Secretariat to review the wording for CP371 Option 2, to provide clarity on what is meant by 'officers'.**
- 6.24 **NEW ACTION 0923/05 - The Delivery Partners to confirm if an impact assessment is required for the proposed and alternative solution to CP371.**
- 6.25 **NEW ACTION 0923/06 - The Ofgem representative to confirm the policy intent for an 18-month limit on notifying EMR-DB of increased operational capacity, as noted in CP371 Option 4.**

7. CMAG Surgery

Splitting and Merging CMUs – Waters Wye Associates

- 7.0 LW noted a scenario where a Capacity Provider wants to sell half of their CMU to another company prior to Significant Completion Milestone (SCM), splitting one asset into two, with two owners. Post-SCM, the Capacity Provider would be able to trade away part of the Capacity Obligation, add a new meter and trade it back into a "new CMU". However there may not be a spare asset to trade to/from to make this work, despite the outcome being the same.
- 7.1 LW further noted a second scenario where a Capacity Provider with two storage assets on the same site wants to merge them into one CMU. Over time as the assets degrade, they believe it will be easier to meet extended performance requirements as one CMU rather than two. The Capacity Provider could trade the Capacity Agreements, re-register the asset as one CMU and trade back, but this is administratively burdensome.
- 7.2 A Member noted that it would be sensible to resolve these issues, but a clear structure and process on how this would be done is required; CMUs submit metering information at prequalification for assurance purposes to ensure that they can deliver, any change would need to have the correct level of assurance to avoid any unintended consequence.
- 7.3 A Member queried if a site is split into two assets, would they require separate metering and connections. LW noted it is commonly seen where a single CMU has multiple Balancing Mechanism Units (BMUs) each with their own metering setup but sharing one connection where there is enough capacity.
- 7.4 A Member highlighted this issue links to CP372 'Change to Rule 4.4.4' and could have impacts on this that need to be considered.
- 7.5 A Member raised concern that allowing for splitting of CMUs could lead to part of an Agreement to be terminated and potential risk to security of supply.
- 7.6 LW noted they have thought about whether a solution should require that a CMU has met its Minimum Completion Requirement (MCR) to avoid this risk, but a subsequent impact is that Capacity Providers do not receive payments until they have met the LSD.
- 7.7 EMR DB noted a solution could consider amending the Auction set-up rules, so the incentive to enter Auction as a single large CMU is changed and avoids the need to split this CMU at a later stage.
- 7.8 LW noted this has been discussed previously, where it had been considered to allow a BMU to enter auction and be linked after as a CMU, but the policy position was that this could lead to problem with Auction rules and trying to link together CMUs later down the line.
- 7.9 A Member queried if Capacity Providers enter Auction at their smallest component level, they will have the flexibility needed rather than a single large CMU that cannot be split. LW noted there is a risk with this that one component could be qualified and another not.

Extension of Secondary Trading Principles - FRV

- 7.10 TG noted that they believe they have identified a gap in the Rules as they stand, which do not adequately provide for the effect of a partial trade of a Capacity Obligation, for a full DY, on EPT requirements under Rule 13.4A.2. Rule 9.5 accounts for a full trade of a Capacity Obligation for a full DY or part of a DY against the EPT requirements.
- 7.11 TG noted this is because within the Rules, EPTs are carried out against a CMU's Adjusted Connection Capacity (ACC) which would not automatically reduce or take account of a reduced Capacity Obligation following a secondary trade. TG further noted they believe this is contradictory to secondary trading policy and intent.
- 7.12 TG informed CMAG they are proposing to reduce the ACC to account for secondary trading, so that it is reduced notionally by any part of the Capacity Obligation that is transferred. TG noted they believe this should also be applied retrospectively to Capacity Agreements in order to be most effective.
- 7.13 LW noted they agreed with this idea, but it would need to consider the requirements for carrying out an EPT; currently an EPT is only required once within three years and if trading away an Obligation for one year at a time a CMU may avoid their EPT entirely.
- 7.14 AL noted that for CMUs who have completed a secondary trade, the proposal seeks to have this appropriately recognised for compliance with EPT, and they would want to balance the flexibility of allowing this whilst avoiding people being able to game a solution and avoid EPT entirely.

- 7.15 A Member supported the idea but noted the development of a solution would need to consider any possible unintended consequences and potential for gaming opportunities; the Member highlighted a scenario where a Capacity Provider could plan to build a two-hour battery storage site, but prequalify as a four-hour site to receive a 15-year Agreement, and continue to trade half of their Agreement away each year.
- 7.16 A Member noted that rather than waiting three years to do your next EPT, a CMU that carries out a trade could be required to do another EPT at the point of trade or annually if they participate in a secondary trade within the three years.
- 7.17 The CMAG Facilitator presented the questions on issue and government policy, and asked CMAG Members for their initial thoughts on how this item could be progressed.

Questions on Issue and Government Policy

Is this a valid issue and is the CM the right place to address the problem?

- 7.18 A Member noted this is a valid problem within the industry and previous CPs in this area have not been progressed due to overlap with policy work. The Member further noted they believe this item could be progressed in tandem with the policy work DESNZ is doing, and it would benefit a range of storage CMUs.
- 7.19 A Member agreed this is a valid issue, but raised concern with how it should be implemented to avoid unintended consequences.

Is the solution to the Change Proposal counter to policy objectives of the CM?

- 7.20 CMAG noted there is some overlap with policy work DESNZ is carrying out in relation to battery storage and EPT requirements that would need to be considered.

Are there any consequential impacts on the Regulations?

- 7.21 CMAG did not identify any consequential impacts on the Regulations.

Does this change explicitly affect any functions granted to the Secretary of State?

- 7.22 CMAG did not foresee any effect on functions granted to the Secretary of State.

Is there an impact on Subsidy Control?

- 7.23 CMAG did not identify any impact on Subsidy Control, but noted a solution would need to be reviewed against this.

8. Industry Feedback

Fossil Fuel Verification Process

- 8.0 A Member noted that while completing their Fossil Fuel Verification (FFV) process, they have been requested to provide additional information by the Independent Emissions Verifier (IEV), and were informed that if they are unable to supply the additional information they will not be able to provide the required verification. The Member is also concerned the auditing companies are not fully aware of the pre-qualification deadlines. The Member has raised concern that some of the above information may not be available yet, and is not requested within the CM Rules or this year's prequalification guidance provided by the EMR DB, and wished to share their experience for information with other CMAG Members
- 8.1 DESNZ noted they are aware of some issues and are working with IEVs to address these; including ensuring they understand the prequalification deadlines for Capacity Providers. DESNZ highlighted the issues raised around CHPQA certificates being valid for 12 months (January – December) which does not align with the prequalification process (September – August), arises from a lack of clarity within guidance and the Rules which DESNZ is seeking to resolve through further engagement and an FAQs document. DESNZ noted the guidance for IEVs gives a reasonable amount of flexibility on whether they can accept a CHPQA certificate, but this should not need to be audited again by the IEV and DESNZ will raise this with IEVs.
- 8.2 A Member noted that it would be helpful to have the Exhibit ZA issued earlier in the year, so this work can begin earlier to avoid problems with delays close to the deadline for submission.

CM Consultations – Autumn 2023

- 8.3 A Member highlighted they are aware of four CM related consultations due to be published this autumn which could be resource-intensive: REMA Consultation, Ofgem Statutory Consultation, National Grid ESO Modelling Consultation on Renewables and Storage and DESNZ' 10 Year Review of the CM. The Member noted it would

be helpful to have advanced notification of when to expect these so that they can prepare the required resource to respond to them.

9. Government Policy Impacts Session

9.0 The CMAG Facilitator noted there are no items for discussion.

10. CMAG Forward Work Plan

10.0 The CMAG Secretariat presented the CMAG Forward Work Plan, there were no comments from CMAG.

11. Action Log

11.0 The CMAG reviewed the Action Log, all 'Complete' actions will be marked as closed. Discussion on actions 'In Progress' can be found in the CMAG Action Log v12.1 – 28.09.23, published on the [website](#).

12. AOB

12.0 There was no further business and the meeting was closed. The next CMAG meeting date is Tuesday 17 October 2023.