

ELELEXION

**Capacity Market Advisory Group (CMAG)
Meeting 24**

17 September 2024

Heath & Safety

In case of an emergency

- An alarm will sound to alert you.
- The alarm is tested for fifteen seconds every Wednesday at 9.20am.

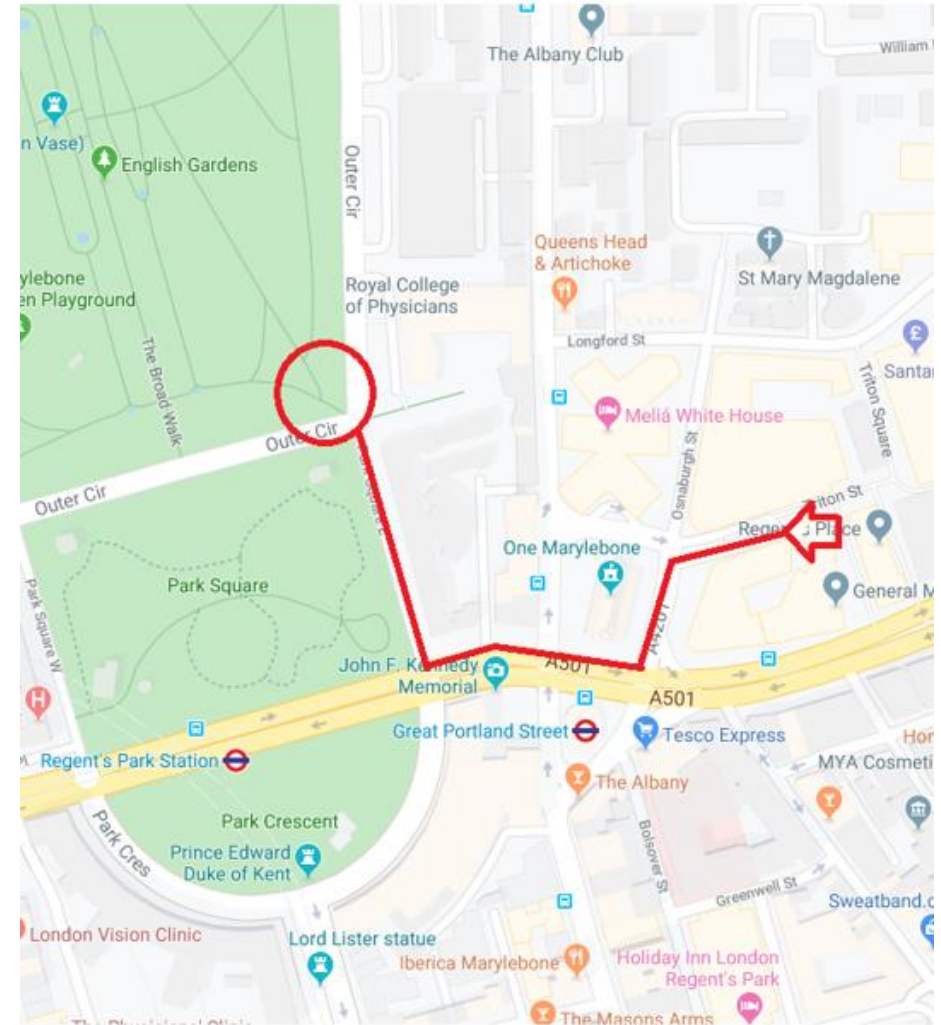
Evacuating 350 Euston Road

- If you discover a fire, operate one of the fire alarms next to the four emergency exits.
- Please do not tackle a fire yourself.
- If you hear the alarm, please leave the building immediately.
- Evacuate by the nearest signposted fire exit and walk to assembly point.
- Please remain with a member of Elexon staff and await further instruction from a fire warden.
- For visitors unable to use stairs, a fire warden will guide you to a refuge point and let the fire brigade know where you are.

When evacuating please remember

- Do not use the lifts.
- Do not re-enter the building until the all clear has been given by the fire warden or ground floor security.

Our team on reception is here to help you, if you have any questions, please do ask them.



Meeting Agenda

Agenda Item	Lead	Guide Start Time
Standing Items		
1. Welcome and Apologies	Oli Meggitt (CMAG Facilitator)	10:00 (5 mins)
2. CM Representative Updates	CMSB; EMR Delivery Body; Ofgem and DESNZ	10:05 (25 mins)
3. CMAG Secretariat Update	Oli Meggitt	10:30 (5 mins)
4. Industry Feedback	Oli Meggitt	10:35 (5 mins)
5. Secondary Trading Eligibility Directory	Toby Hastings (CMSB)	10:40 (30 mins)
6. CMAG Surgery <ul style="list-style-type: none"> Clarify the scope of Rule 8.5.1 for Interconnectors 	Paul Farmer (CMAG Secretariat)	11:10 (20 mins)
Break (11:30 – 11:40)		
Information Items		
7. Developing CM Rules Change Proposals <ul style="list-style-type: none"> CP380 'Extending the Financial Commitment Milestone' CP382 'ITE Report Requirements' 	Paul Farmer (CMAG Secretariat) Christ Arnold (CMAG Secretariat)	11:40 (65 mins)
Lunch (12:45 – 13:30)		
8. CMAG Forward Work Plan	Paul Farmer (CMAG Secretariat)	13:30 (20 mins)
9. Action Log	Paul Farmer (CMAG Secretariat)	13:50 (10 mins)
10. Any Other Business (A.O.B)	All	14:00

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

- CMSB
- EMR DB
- OFGEM
- DESNZ



CMAG SECRETARIAT UPDATE

CMAG Member Feedback Survey - April 2024 to September 2024

- [Survey Results](#)



INDUSTRY FEEDBACK



SECONDARY TRADING ELIGIBILITY UPDATE

Secondary Trading Arrangements – Progress update

CMAG September 2024

Agenda

1. Background
2. Project overview
3. Industry feedback
4. Summary & future project scope



ESC 2023-24 priorities

- ST impacts on Settlement / Aggregation Rule process (DB to SB) change. In scope of Aggregation rule project due to development efficiencies when ST process considered **End-July go-live (CP373)**
- ST platform: Progress ESC proposal to utilise existing data from the CM to enhance CMU visibility.

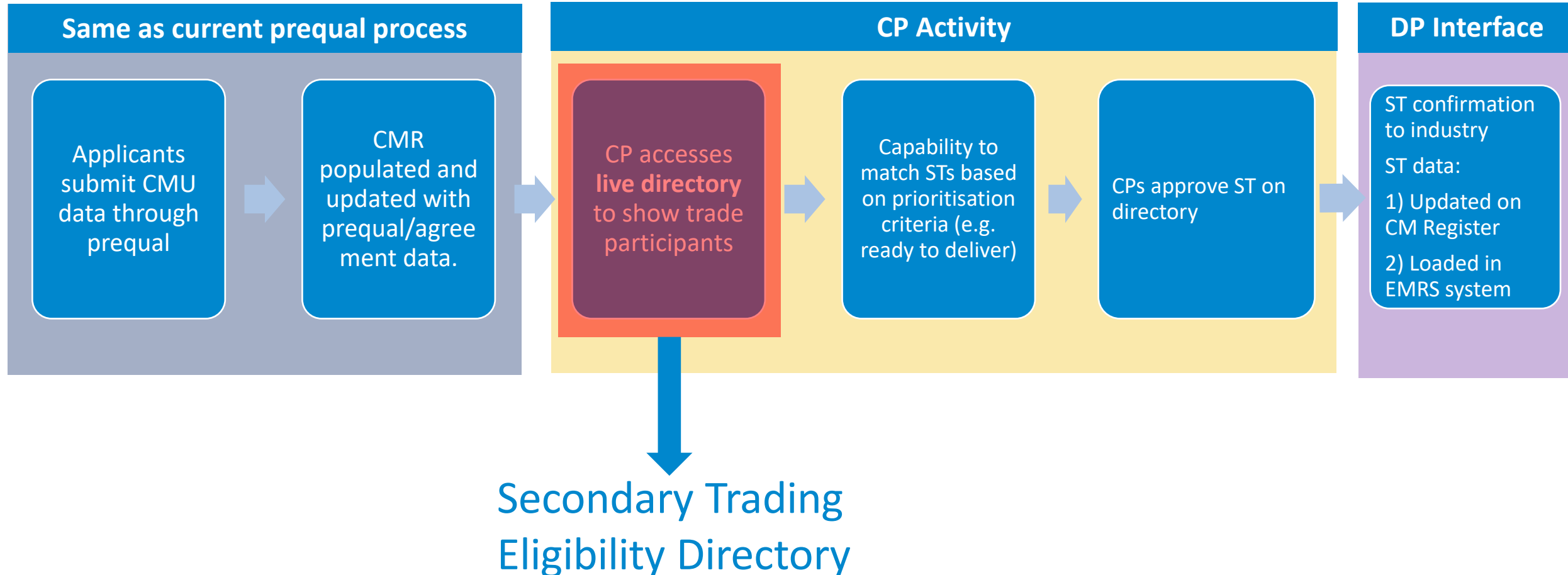
ESC Proof of Concept project initiated – Utilising existing data to create live directory

- Explore visibility of gaps to identify available CMUs with existing qualified capacity that do not have active agreements
- Define availability based on set criteria (Registered as scheme participant, Agg rules, Metered Data set up etc.)
- Project aim is to organise data to support trading and deliver within the current Rules & Regs framework
- Proof of concept will be transferable to accommodate any future policy decision **(Second Phase)**
- Similar concept to existing initiatives already in operation:
 - Aggregation Rule/Metered Data monitoring,
 - SPD/Extended Performance testing

New Secondary Trading Process (Proposal)

Presented CMAG
March 2023

Proposal presented for live ST directory to support CPs to match gaps with potential opportunities



Project overview

Timeline of Secondary Trading Eligibility Directory project

2023

March/April Secondary Trading Proposals presented at CMAG

2024

March Project kick off

17 April Development completed

22 May Internal UAT completed

June Directory presented to select Capacity Providers and Delivery Partners

18 July Directory soft-launch; link provided to select Capacity Providers

29 July CP373 Functionality went live on MyEMRS portal

August CP373 functionality implemented into Directory

September Directory go-live; communication to be sent to industry

Project overview

The Directory contains a list of CMUs that satisfy the eligibility criteria to be Acceptable Transferees for Secondary Trading for the current Trade Request window.

The objectives of the directory are to:

- Support Capacity Providers to identify trading opportunities
- Reduce Delivery Partner administration
- Improve controls to correctly setup before CMU DY participation

The following benefits are expected to be realised through use of the directory:

- Reduced administrative time for Capacity Providers spent identifying suitable transferees to trade with
- Reduced time for the Delivery Body processing applications where transferees do not meet ST criteria
- Reduced chance of eligible transferees being overlooked as potential trading partners

Automated logic and ST criteria

- Majority of the eligibility criteria for Acceptable Transferees from CM Rule 9.2.6 **automated utilising existing data available**
 - Similar concept to SPD proof of concept modelling
- Data used from CM Register and Settlement Body data
- Additional insight visible through the modelling of the eligibility criteria
- Some CM Rule criteria are not included due to the difficulty in automating the data source, size resource on the dashboard, or the difficulty in creating reliable logic
- Summary criteria included and excluded, the data sources, and methodology of the logic is provided in the [Appendix](#).

Secondary Trading Eligibility Directory

This directory displays those Capacity Providers that may be eligible for Secondary Trading due to them meeting the conditions in Rule 9.2.6 of the Capacity Market Rules.

The directory is provided for informational purposes only and should not be considered exhaustive or definitive in determining eligibility for Secondary Trading.



SECONDARY TRADING ELIGIBILITY DIRECTORY

Name of Applicant: Type: Delivery Year: Technology:



Total Capacity Obligation (MW)

De-Rated Capacity (MW) - Total Capacity Obligation (MW)



This directory displays those Capacity Providers that may be eligible for Secondary Trading due to them meeting the conditions in Rule 9.2.6 of the Capacity Market Rules.

The directory is provided for informational purposes only and should not be considered exhaustive or definitive in determining eligibility for Secondary Trading.

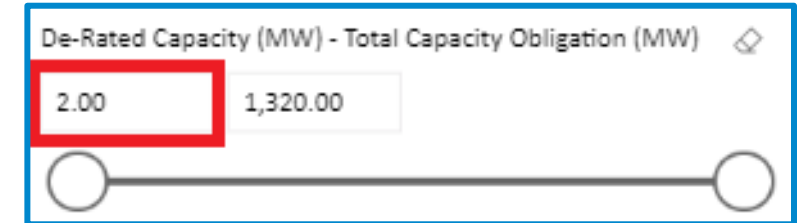
CMU ID	Type	Delivery Year	Name of Applicant	CM Unit Category	Generating Technology Class	Pre-Qualification Decision	Capacity Agreement Awarded	Auction Price (£/kW/year)	Auction Acquired Capacity Obligation (MW)	Physically Traded Capacity Obligation (MW)	Total Capacity Obligation (MW)	De-Rated Capacity (MW)	Secondary Contact
CFT118	T-1	2019	TGC EMERALD LIMITED	New Build Generating CMU	Reciprocating engines	Prequalified	Yes	0.770000	5.63	0.00	5.63	5.71	0044203
NHT118	T-1	2019	TGC EMERALD LIMITED	New Build Generating CMU	Reciprocating engines	Prequalified	Yes	0.770000	5.58	0.00	5.58	5.71	0044203
PHT118	T-1	2019	TGC EMERALD LIMITED	New Build Generating CMU	Reciprocating engines	Prequalified	Yes	0.770000	5.64	0.00	5.64	5.71	0044203
ROCK21	T-4	2024	SUSI EELPOWER ROCK FARM LIMITED	Existing Generating CMU	Storage (Duration 1h)	Prequalified	No	21.959431	0.00	0.00	0.00	4.92	0044792
IM2019	T-1	2020	IMMINGHAM POWER LIMITED	Existing Generating CMU	Reciprocating engines	Prequalified	No	1.000000	0.00	0.00	0.00	15.01	0044292
STAS19	T-1	2020	ST ASAPH POWER LIMITED	Existing Generating CMU	Reciprocating engines	Prequalified	No	1.000000	0.00	0.00	0.00	15.01	0044292
WEST19	T-1	2020	WESTWOOD POWER LIMITED	New Build Generating CMU	Reciprocating engines	Prequalified	No	1.000000	0.00	0.00	0.00	19.00	0044292
WHAR19	T-1	2020	WHARF POWER LIMITED	Existing Generating CMU	Reciprocating engines	Prequalified	No	1.000000	0.00	0.00	0.00	15.01	0044292
HPGL19	T-4	2023	HARWORTH POWER (GENERATION) LIMITED	Existing Generating CMU	Reciprocating engines	Prequalified	Yes	19.761408	3.80	-2.28	1.52	3.80	0044192
FR2116	T-4	2026	FEEDER GRID STORAGE LIMITED	New Build Generating CMU	Storage (Duration 1h)	Prequalified	No	63.000000	0.00	0.00	0.00	2.36	0044117
CONT20	ST	2021	HARMONY CS LIMITED	New Build Generating CMU	Storage (Duration 2h)	Prequalified	Yes	45.000000	0.00	0.00	0.00	16.53	0349131
HCTF20	T-4	2024	HARMONY CTF LIMITED	New Build Generating CMU	Storage (Duration 2h)	Prequalified	Yes	21.959431	23.95	0.00	23.95	24.07	0349131
TEES18	T-1	2019	SPARK STEAM LIMITED	Existing Generating CMU	Combined Heat and Power (CHP)	Prequalified	No	0.770000	0.00	0.00	0.00	5.94	0044203
TEES19	T-1	2020	SPARK STEAM LIMITED	Existing Generating CMU	Combined Heat and Power (CHP)	Prequalified	No	1.000000	0.00	0.00	0.00	5.94	0044203
22S801	T-4	2023	SUTTON BRIDGE POWER GENERATION	Existing Generating CMU	Combined Cycle Gas Turbine (CCGT)	Prequalified	No	19.761408	0.00	0.00	0.00	765.00	0044163
22SV10	T-4	2023	SEVERN POWER LIMITED	Existing Generating CMU	Combined Cycle Gas Turbine (CCGT)	Prequalified	No	19.761408	0.00	0.00	0.00	382.00	0044163
22SV20	T-4	2023	SEVERN POWER LIMITED	Existing Generating CMU	Combined Cycle Gas Turbine (CCGT)	Prequalified	No	19.761408	0.00	0.00	0.00	382.00	0044163
4UKNN2	T-4	2018	FRP MERCIA HOLDCO LIMITED	New Build Generating CMU		Prequalified	Yes	26.304026	2.81	0.00	2.81	2.92	0044115
FRP2GE	T-4	2026	FRP MERCIA HOLDCO 2 LIMITED	New Build Generating CMU	Reciprocating engines	Prequalified	No	63.000000	0.00	0.00	0.00	4.66	0044115
FRPCL2	T-1	2019	FRP MERCIA HOLDCO LIMITED	New Build Generating CMU	Reciprocating engines	Prequalified	Yes	0.770000	7.26	0.00	7.26	7.45	0044115
FRPCR3	T-1	2019	FRP MERCIA HOLDCO LIMITED	New Build Generating CMU	Reciprocating engines	Prequalified	Yes	0.770000	7.35	0.00	7.35	7.45	0044115
FRPGED	T-4	2023	FRP MERCIA HOLDCO 2 LIMITED	New Build Generating CMU	Reciprocating engines	Prequalified	Yes	19.761408	4.56	0.00	4.56	4.65	0044115
FRPODR	T-4	2023	FRP MERCIA HOLDCO 2 LIMITED	New Build Generating CMU	Reciprocating engines	Prequalified	Yes	19.761408	1.60	0.00	1.60	2.79	0044115
FRPWEL	T-4	2023	FRP MERCIA HOLDCO 2 LIMITED	New Build Generating CMU	Reciprocating engines	Prequalified	Yes	19.761408	8.15	0.00	8.15	8.37	0044115
FRPCL1	T-1	2019	FRP MERCIA HOLDCO LIMITED	New Build Generating CMU	Reciprocating engines	Prequalified	Yes	0.770000	7.35	0.00	7.35	7.45	0044115

Example of how to use

Scenario: Transferee wishes to trade the entire capacity of their CMU with an AACO of 2.00 MW.

Steps:

- 1) Filter *De-Rated Capacity - Total Capacity Obligation* to have a minimum value of 2.00 MW.
- 2) Filtered CMUs meet the criteria to be eligible transferees *AND* have available capacity to take on the transfer without exceeding their De-Rated Capacity.
- 3) The information from the Secondary Trading contact columns is used to contact the potential transferees.
- 4) The Secondary Trading process is continued as usual.



Auction Acquired Capacity Obligation (MW)	Physically Traded Capacity Obligation (MW)	Total Capacity Obligation (MW)	De-Rated Capacity (MW)	Secondary Trading Contact - Telephone	Secondary Trading Contact - Email

Further metrics to filter:

- Name of Applicant
- Technology Type
- Auction & Delivery Year
- Total Capacity Obligation (MW)

Industry Feedback



Feedback on Secondary Trading and Directory

Directory presented to:

- Six CPs with largest traded capacity in 2023/24 DY & total scheme – one demo outstanding.
 - CPs presented to are responsible for:
 - 22% of traded capacity for DY23/24
 - 41% of traded capacity for scheme to date
 - Delivery Partners (DB, DESNZ, Ofgem)
- CPs also tested functionality individually and provided valuable feedback

We welcome further engagement and feedback to improve the tool, please send to: info@electricitysettlementscompany.uk

Existing methods used to identify potential Secondary Trading participants

Frequent:

Active network of contacts within well-connected industry & leveraging of previous partnerships

Frequent:

Internal within portfolio with assets unsuccessful in PQ/auction or spare capacity agreements

Less frequent:

Capacity Market Register

Less frequent:

Piclo platform

Opportunity exists to better support CPs to match gaps with potential ST opportunities

Secondary Trading Eligibility Directory

Capacity Provider Feedback

“It’s easy to navigate and very user friendly.”

“We can see the benefits of using this tool to the industry already as we are able to identify trading opportunities easily.”

“We have already made use of the directory since it’s been released to identify trading opportunities without any issues.”

“It is helpful to have this information in one place.”

“This is supporting providers and the industry in identifying [trading] opportunities easier.”

“The relevant information that a Capacity Provider would need to see should they be looking to secondary trade is included.”

Feedback: Improvements and future Opportunities

Changes made based off CP feedback:

- Added Auction Price and Technology Type to Directory
- Added Technology Type filter
- Added free text entry for Name of Applicant filter
- Various data cleaning improvements

Short term future changes:

- Rename Delivery Year to Auction Year
- Reduce Auction Price & capacity figures to 3 decimal places
- Add agreement lengths into directory
- Widen the box that the dashboard is in on website
- Remove T-4 2022 auction as was not active
- Add an 'Available Capacity' column which is De-Rated Capacity minus Total Capacity, or change Total Capacity column to be this 'Available Capacity' column
- Add more detailed documentation onto information screen to ensure clarity on any modelling logic

Medium term future changes:

- Account for cloned CMUs
- Define default/ideal 'Sort' function to best display information by default
- Add post-refurb de-rated capacity to the de-rated capacity of refurbished CMUs

Longer term future changes – future project scope:

- **Transferors directory** – Show potential capacity lost / at risk and CMUs with flag to indicate a willingness to trade capacity
 - Include the ability to sort and filter based on this indication.

Summary & future project scope

Secondary Trading Eligibility Directory – Key Points

- Aim is to publish as a proof-of-concept resource for industry
- No change to existing ST process, every ST subject to independent approval by the DB
- Only publicly available CMR data is displayed & automatically updated with weekly data refresh
- Success/fail criteria to determine if a CMU is/is not on the directory will not be made public
- Only displays CMUs that may be Acceptable Transferees as per CM Rules criteria

Next steps

- Directory to be published and communicated to industry
- Changes to the Directory will be assessed and taken forward internally by ESC
- Ongoing feedback regarding the Directory and the Capacity Market welcome, please contact us: info@electricitysettlementscompany.uk

Aim:

- 1) Support Capacity Providers to identify trading opportunities**
- 2) Reduce process administration**
- 3) Assist policy discussion to improve ST mechanism**

Appendix

Data sources & eligibility criteria checks automated

Logic and Data Sources

The Directory uses logic to assess whether a CMU has met the criteria to be an Acceptable Transferee for Secondary Trading according to CM Rule 9.2.6.

The logic first checks if a Capacity Provider has satisfied one of either 9.2.6 (a), (b), (c), or (d), and then whether it passes all of 9.2.6 (e) (i) to (xii), where applicable. We have also included logic that checks if a Capacity Provider is an active scheme participant, as detailed in the following slides.

The directory uses information from the following data sources:

- Capacity Market Register
- Capacity Market Metering Register
- Capacity Market Termination Log
- Capacity Market Metering Test Log
- Capacity Provider Invoice Log
- Capacity Obligation data
- Metering Aggregation data
- Metered Volume data

Included Criteria

Transfer eligibility criteria	Reason for criteria
Partially traded obligation: minimum capacity > 1MW	CM Rules
De-rated Capacity check to ensure Transferee's CMUs sufficient to meet all obligations	CM Rules
No termination notices issued or in place	CM Rules
Transferee CMU has demonstrated De-rated Capacity in the previous 6 months	CM Rules
Unproven DSR CMU completed DSR Test	CM Rules
Prospective Generating CMUs have met milestone reqs.	CM Rules
The delivery year is later than 2018 for existing Interconnector CMU	CM Rules
New Build CMU has provided a copy of its Distribution Connection Agreement	CM Rules
CMU has provided a copy of its Grid Connection Agreement	CM Rules
A bidder in a Capacity Auction with a Prequalified CMU that does not have a Capacity Agreement for that Delivery Year.	CM Rules
Transferee has prequalified	CM Rules
Transferee has no payments due	CM Rules
CMU completed Metering Assessments and or Tests	Active Scheme Participation – currently static data in dashboard
Registration with Settlement Body	Active Scheme Participation
Aggregation Rules setup	Active Scheme Participation
Metered Data set up	Active Scheme Participation

CMU total satisfying Included Criteria

CM Rules Ref	Transfer eligibility criteria	% of CMUs meeting criteria*
9.2.6 (a)	a bidder in a Capacity Auction with a Prequalified CMU that does not have a Capacity Agreement for that DY	27%
9.2.6 (b)	Prospective Generating CMUs have met milestone requirements	3%
9.2.6 (c)	De-rated Capacity check to ensure Transferee's CMUs sufficient to meet all obligations	34%
9.2.6 (d)	Transferee has prequalified	4%
CMUs that met criteria of at least one of (a), (b), (c), or (d)		38%
9.2.6 (e) (ii) (aa)	Transferee has no payments due	97%
9.2.6 (e) (iv)	The delivery year is later than 2018 for existing Interconnector CMU	100%
9.2.6 (e) (v)	New Build CMU has provided a copy of its Distribution Connection Agreement	99%
9.2.6 (e) (vi)	CMU has provided a copy of its Grid Connection Agreement	99%
9.2.6 (e) (vii)	Prospective Generating CMUs have met milestone requirements	97%
9.2.6 (e) (viii)	DSR CMU has completed DSR Test	84%
9.2.6 (e) (ix)	No termination notices issued or in place	98%
	CMU completed Metering Assessments and or Tests	49%
	Registration with EMRS	76%
	Aggregation Rules setup	37%
	Metered Data set up	39%

*includes CMUs to which the criteria does not apply

Excluded Criteria

CM Rules Reference	Transfer eligibility criteria	Reason for exclusion
9.2.6 (e) (i) (aa)	The transferee's aggregate De-rated Capacity does not exceed what is recorded on the Capacity Market Register	This will be checked by the Delivery Body once the trade is submitted.
9.2.6 (e) (i) (bb)	After the transfer, a transferee's Transmission Entry Capacity does not exceed what is recorded on the TEC Register.	Difficulty automating the TEC register data.
9.2.6 (e) (ii) (bb)	The transferee has delivered a capacity at least equal to its De-rated Capacity in any settlement period prior to the start of the Delivery Year in which the transfer is taking place.	Modelled internally. Left off directory due to size of data.
9.2.6 (e) (iii)	The transferee is not a Bidder or Capacity Provider of a Defaulting CMU.	No instances of this occurring - no CMU has ever defaulted.
9.2.6 (e) (x) 9.2.6 (e) (xi) 9.2.6 (e) (xii)	If it is required to do so, the transferee must have provided a Fossil Fuel Emissions Declaration to the Delivery Body.	CMR data does not currently show this. To be considered once access to data is improved in the future.

We have assessed these criteria and assumed that the number of Capacity Providers who would not be eligible based on the criteria we have omitted would be negligible. We will report these assumptions and findings.



CMAG SURGERY

CLARIFY THE SCOPE OF RULE 8.5.1 FOR INTERCONNECTORS

Issue

What is the Issue?

Interconnector CMU's may be required to reduce the Net Output of its CMU to an amount lower than the Interconnector Scheduled Transfer, following a request from the GB System Operator or from the system operator in a connected country.

The proposer seeks to amend Capacity Market Rule 8.5.1 to include an additional clause, which will ensure that when services are agreed between system operators that restrict the net output of an Interconnector CMU – regardless of which system operator initiated the request – this reduction is taken into consideration.

Where have we got to?

At CMAG 23, ElecLink presented the issue for them, stating that the change would provide clarity between the current intent of the Capacity Market Rules and how the existing drafting could lead to differing interpretations.

The following two Scenarios were identified as areas open to interpretation of the current legal text.

- Scenario 1b, a Capacity Committed CMU is affected by a measure instigated by a System Operator in a connected country, which has been accepted by the GB System Operator.
- Scenario 2b, when a Capacity Committed CMU is affected by a measure instigated by the System Operator in a connected country unilaterally (i.e. outside of the ESO's control).

Issue

Where have we got to?

ElecLink believe the policy intent is to exempt Interconnectors from their Capacity Obligation for issues outside of their control, which is different to the rule 8.5.1(ba)'s 'a measure taken by the System Operator'.

The existing ALFCO exemption criteria set out in rule 8.5.1(ba) will only take into consideration actions which have been 'taken' (or initiated) by National Grid ESO.

At CMAG 23, CMAG Secretariat took an action to research and share what they can find out on any policy intent, which could cover Scenarios 1(b) and 2(b).

- There appears to be no specific policy intent documented in the 2014 consultation on adding Interconnectors to the Capacity Market, related to 'measure taken by the System Operator' that might help judge if scenarios 1b/2b qualify under 8.5.1(ba).
- Similar as regards Schedule 7A trades qualifying under 8.5.1(ba), which was raised as an area of possible similarity.

CMAG went through the standard questions on the Issue and Government Policy. It was agreed that the rules should be made explicit to avoid doubt.

CMAG Secretariat highlighted that next steps are dependent on clarifying policy intent. DESNZ agreed to review and input for next steps.

Questions on Issue and Government Policy

Members are requested to provide a response to the below questions on issue and Government policy:

Questions on Issue and Policy

Is there a valid issue?

Is the CM the right place to address the issue?

Would any solution be counter to the policy objectives of the CM? What is the impact on:

- **Security of Supply**
- **Cost (including cost to consumers)**
- **Unintended consequences – if there are any, what is the impact?**

Would any solution explicitly affect any functions granted to the Secretary of State?

For example, the Energy Act 2013 set specific functions to the Secretary of State. Derating factors is an explicit function of the Secretary of State.

Is there an impact on subsidy control?

For example, anything that would favour one technology class over another, that would probably mean you have to go through the subsidy control framework.

Do you agree that CMAG should proceed with raising a CM Rules Change Proposal for this issue?

Rationale to support answers to this question should take into consideration the likely prospects of this CP being approved and the required levels of work from the CMAG.



DEVELOPING CM RULES CHANGE PROPOSALS

CP380 - 'EXTENDING THE FINANCIAL COMMITMENT MILESTONE'

Issue and Proposed Solution

What is the Issue?

A Capacity Provider's Prospective CMU with a T-4 Agreement is required by Rule 6.6.1 to meet its Financial Commitment Milestone (FCM) by 16 months after its Auction Results Day (ARD), which includes (under Rule 6.6.2(a)) that Capital Expenditure (Capex) has been incurred and paid at least equal to 10% of the Total Project Spend (TPS).

For some CMUs this necessitates paying suppliers earlier than would otherwise be necessary, having negative commercial consequences for the project.

Where have we got to?

At CMAG21 a Surgery Item was discussed to consider the options for addressing this issue and it was agreed that the preferred solution was Option B, to only allow extension of the deadline for Capex to be incurred and paid up to 30 months after the ARD.

Initial Options

- A. Extend the full FCM requirements, based on the initial Construction Plan;
- B. Only extend the deadline by when the 10% of TPS has to be demonstrated;
- C. Vary the FCM at Application based on an extended 3.7.2(c), with different deadlines for the initial Directors' Certificate & Funding Declaration and subsequent 10% of TPS;
- D. Following on from Option C, allowing the deadlines to be extended based on updated Construction Plans to be provided under 12.2 Construction Monitoring;
- E. Building on Option C, where the % of TPS to be demonstrated can also be varied.

After further discussions, proposed legal text was sent to CMAG for review 25th July.

Issue and Proposed Solution

Where have we got to?

At CMAG 23, discussed Legal Text review;

- Whether ITE assurance was necessary when applying for an extension, over and above a directors' certificate, as proposed;
- Members agreed the approach should be consistent with CP371 - Protection from Very Late Network Connections, and a certificate signed by two directors would offer sufficient assurance;
- The Standard Questions were considered and CMAG members agreed with the proposed solution, including the removal of the ITE requirement;
- EMR DB and CMSB confirmed that CMAG Secretariat should formally request an Impact Assessment – actioned 22nd August;
- EMR DB did raise a concern that as legal text drafting wasn't specific to a technology, they want to make sure the option of an extension of the deadline for demonstrating 10% of TPS incurred and paid, wasn't taken up by every CMU;
- CMAG Secretariat suggested a CMU using such an extension as a means of delaying their payments to suppliers would only jeopardise the CMU meeting their Substantial Completion Milestone, before the start of the first Delivery Year. Therefore, missing out on capacity payments, which should be evident in progress reports and remedial plans.

Questions from EMR DB for CMAG

Is there value in requesting an extension after an application has been submitted (6.6.1A(b))?

- This change is explicitly for technologies who do not need to pay 10% of the TPS at ARD+16 months and this would be known at application. To allow a later extension would encourage its use where there have been other project delays and would add significant complexity to our portal change and processes. Restricting the extension to only occur at prequalification. This CP has the potential to increase 'prospective' use of the extension where it is not necessary, we are interested to hear CMAG members views on applicant behaviour.

Is there a wider discussion to be had on whether Milestones should be more flexible?

- When this was discussed previously (CP371, 372, 374 and 375) DESNZ gave a very clear steer that some risk has to sit with the Applicant rather than with the scheme.

Where do members see the value of a nominated date between ARD+16 months and ARD+30 months and having a fixed extension to ARD+30 months?

- A fixed deadline gives more certainty for termination events and will be easier to manage.

CP380 Solution

Question 1: Please provide your view on the technical feasibility of the solution, and any constraints that need to be considered.

Please enter your response or note 'No impact'.

These changes are technically feasible, with two constraints. First we propose a number of modifications to the change to mitigate risk and cost and second we require certainty of rules by December 2024 to plan and implement these changes ahead of the 2025 prequalification round.

Question 2: Are there any alternative options that you believe need to be considered to mitigate risk or excessive cost?

If 'Yes', please provide additional information on the alternative solution.

During the Impact Assessment we have considered three alternative options which we believe will mitigate both risk and cost without impacting the original intent of this change.

You will see in this Impact Assessment we refer to the effort of the 'base solution' which assumes all three of the below changes are made and calls out the extra work of each scenario 1, 2 and 3. The impacts described below are in addition to the impact of the base solution which are outlined in questions 3 and 4.

1. Removing the proposed rule 6.6.1A(b) which allows the extension to be sought following Prequalification.

The CP was brought to stop providers having to make payments before otherwise necessary, as construction of some CMU types differs significantly from when the CM Rules were first drafted. These payment timetables should be known at the point of Application and so it should be clear to these providers if the extension is required at this point. We believe allowing an extension following Prequalification extends the scope of this Change Proposal and may be used to conceal construction delays and promote less diligence at the point of Application. We appreciate removing this flexibility may lead to more providers asking for an extension at application but feel the Directors confirmation of need, as discussed in CMAG meetings, should be enough to stop providers requesting this extension as a risk mitigation.

From a system and process perspective allowing the extension following prequalification would create an additional process which is a **medium cost to build that would not otherwise exist moving the total effort to medium/high rather than just medium**. This process would allow a provider to request the extension through the portal (a 'Management Activity'), to be assessed by the Delivery Body and if an extension is granted to update the FCM deadline stated in the portal which would be monitored and failure to reach would lead to a Termination Event.

2. Revising the definition of a Spend Profile to simplify both the creation and assessment of these documents, potentially replacing the profile with a Directors Certificate.

The current Spend Profile definition requires a significant amount of information to be provided showing the month-by-month estimated and actual spend on a project for the 77 months before the Delivery Year. We are interested to understand from members the effort required to create such a Spend Profile.

We as the Delivery Body would have no power in the current drafting to assess the accuracy of such a Spend Profile, or to reject a Spend Profile that meets this definition but is demonstrably inaccurate. This kind of assessment would be above the current expertise requirements on the Delivery Body and so at present we are not resourced with the knowledge expertise to assess the accuracy of such a document. This is a similar issue faced with current ITE reports and we feel instead of requiring the submission of a Spend Profile a Directors Certificate with a fixed declaration would provide more assurance with less effort to produce and assess.

This change **will not have a further system impact** as in either event a file upload is required, but will increase the processing time required when submitted from a **low impact to a medium impact** (depending on the number of submissions) and increase the risk of false assurance where a misleading Spend Profile is submitted.

3. Fixing the extension date to ARD + 30 months (the proposed maximum) rather than allowing Applicants to choose a stated extension.

Under the current proposal an Applicant is allowed to request a deadline extension to the date their Spend Profile deems necessary to a maximum of ARD +30 months. There are no changes to the Credit Cover requirement, including the increase at ARD +12 months, and so providers will be incentivized to meet this deadline as early as possible even without the Termination Event. We would like to see all Applicants who meet the requirements for the extension granted an extension to the same date, ARD + 30 months, to allow for simpler processing and to reduce the complexity of milestones.

Adding a flexible deadline removes certainty from the scheme and adds complexity to providers deadlines. This will both impact providers with multiple CMUs and the Delivery Body's processes to monitor compliance and potential Termination Events. As there is an existing incentive to meet this obligation as early as possible, and the rule change introduces a latest date, we do not believe there is a strong justification for this additional complexity (contrasted with 6.7.7 extensions) or the additional resource.

This change can be implemented in our system with minimal changes to the development effort but would increase the processing complexity from a **low effort to a medium** as we would need to continuously monitor these milestones and any failure to meet them, rather than monitoring consequences at a fixed date.

Question 3: Are there any known implementation or ongoing costs for your organisation to implement CP380?

Base scenario: **Medium**
As proposed:
Medium/High

Please provide rationale for your response.

Ongoing Costs

Looking at the base case for this change we believe this would lead to a low-cost change, primarily receiving and reviewing the Directors Certificate as part of the prequalification assessment and monitoring an additional deadline for those that are granted the extension, including our usual communications on upcoming deadlines. We continue to believe these submissions will only come from certain technologies and so the numbers will be limited, though if more fast-to-build technologies enter the Capacity Market these

ongoing costs will grow and this change may need to be revisited.

As described above if any of the mitigations are not adopted this would mean the change brings a **medium** cost, with none of the mitigation adopted this change would be a **medium/high** cost to resource on an ongoing basis.

Implementation Costs

The base case implementation costs will mostly be made up of portal development work, estimated to be at least two development sprints. The base case is a **medium** level impact as it requires changes to both applications and outstanding activities sections of the portal, but with limited overlap between these two areas. The proposed change would be more complex, as above an additional process would have to be built on top of the application request and FCM submission to request the extension, as well as passing variable dates between both parts of the portal. This would mean the change is **medium/high** impact. We will also have to update our processes, process documentation and guidance for either change, but this implementation cost is much lower than the portal development work.

EMR DB Impact Assessment

Question 4: Are there any known impacts (positive or negative) to your organisation to implement CP380?

Base case: Low to Medium
As proposed: Medium to High

Please provide rationale for your response.

On the base case this change would bring a number of impacts for the delivery body, as above an additional prequalification assessment and a new deadline to manage following prequalification. This base case would lead to increased workload and increased risk as additional deadlines are introduced, though we believe these impacts remain low and well within proportion of the benefit of change to the scheme.

We do not believe there is justification under this Change Proposal for the additional development resource required to allow extensions following prequalification (1) and would like to understand CMAG members views on the effort required to produce a Spend Profile versus a Directors Certificate and the assurance provided by these two documents (2).

Finally we do not believe the additional effort and risk currently proposed by a variable deadline is proportional to the benefit to the scheme (3), again we welcome members views on this point.

Overall this change will have a low to medium impact on the Delivery Body at its base case, and a medium to high impact if none of the mitigations are adopted.

Question 5: What are your expected timescales for implementation of CP380?

Please include any foreseeable dependencies or challenges with implementing CP380.

Our Portal development process are resourced around fixed ten to twelve week increments which encompass requirement gathering, development and testing and we work on multiple changes simultaneously. It is difficult to identify the timescales for a single change in isolation as there can be efficiencies, or complications, from other changes in the improvement and regulatory pipeline. To implement this change before the 2025 Prequalification Window we would require certainty by the end of December 2024 for development to start early in 2025.

CP380 – Specific Questions

Question	CMAG Comment
Does the CP further the CM Rules Change Objectives?	Reg 78 (a) promoting investment in capacity to ensure security of electricity supply. CP380 avoids unnecessarily tying up capital in prepayments / early orders to meet FCM, and it is therefore easier for the asset owner to achieve target returns, making investment in new capacity more likely
Are there any related changes to the CM Rules in the pipeline?	CP371 Protection from Very Late Network Connections
Does the CP impact on the Regulations?	The CP supports reg 78 (a) promoting investment in capacity to ensure security of electricity supply. No other impacts identified by CMAG.
Are there any impacts on any other central industry frameworks or obligations?	CMAG did not identify any impacts on any central industry frameworks or obligations.

CP380 – Standard Questions

Question	CMAG Comment
Are there any impacts on consumers, and if so, what are the impacts?	From the consumers' point of view, there will be benefit - by avoiding unnecessarily tying up capital in prepayments / early orders to meet FCM, it is easier for the asset owner to achieve target returns and enables them to submit more competitive bids in CM auctions, lowering costs to the consumer.
Does CMAG agree with the proposed solution? Are there any suitable alternative solutions to address the defect?	Yes, this has received support in discussions at previous CMAG meetings Alternative legal text options have been considered and Option B of the previously circulated legal text is preferred.

Question	CMAG Comment
What are the expected impacts and implementation/enduring costs for CM Participants?	CMAG Comment We would not expect significant enduring costs for CM participants. CMAG Questions 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 impacts and implementation/enduring costs for Delivery Partners	Proposer Comment Input from delivery partners is required. CMAG Questions To be discussed at CMAG 24.

CP380 - Standard Questions

Question	CMAG Comment
What are the expected timescales for implementation?	To be discussed within CMAG
Does the draft legal text deliver the intention of the solution?	We believe Option B achieves our intentions, but the text will benefit from discussion within CMAG
Does the CMAG recommend to Ofgem that the change be made?	TBC

CP380 - Standard Questions

Does the CP further the CM Rules Change Objectives and/or Ofgem's Principal Objectives?
(Yes, No or Neutral)

Ofgem's 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
- (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

Proposer View

Reg 78 (a) promoting investment in capacity to ensure security of electricity supply

CP382 - INDEPENDENT
TECHNICAL EXPERT
DEFINITION UPDATES
AND REPORT TEMPLATES

Issue

- **Significant variance in the nature of ITE providers** – CMAG Members have highlighted that the expertise, quality standards and experience of ITE organisations/individuals varies enormously.
- **Significant variance in the nature of ITE reports submitted to EMR DB** – CMAG Members have highlighted that the content of ITE reports that are submitted to EMR DB varies enormously.
- **EMR DB has limited powers to reject poor quality ITE reports** – EMR DB have highlighted that they only have powers to assess ITE reports against the requirements set out in the CM Rules. As a result, the ITE report rejections reasons are primarily limited to whether relevant ITE declarations have been made and whether an ITE that has prepared a given report meets the requirements to be an ITE. Importantly, EMR DB have stated their powers to reject on the basis of the evidence and content of a submitted report is limited.
- **Level of Assurance** – Concerns have been raised as to whether the current CM Rules ITE Reporting requirements deliver the appropriate level of assurance intended by policy. Members have raised specific concerns in relation to:
 - o A lack of consequence for providing poor quality ITE reports;
 - o Whether, in some cases, ITE reports may be required when they are not adding any value, or not required when they could add a level of assurance; and
 - o It is not clear what assurance value some requirements of ITEs or ITE reports add.
- **Suitability of ITE reporting requirements** – Questions have been raised as to whether the current provisions suitably distinguish between relevant CMU types and Generating Unit attributes

Proposed Solution

The ITE Subgroup have made a number of recommendations. For full details see the materials available on the CMAG website but in summary the proposed solution seeks to:

- Update the ITE definition to remove the requirement for international experience;
- Move to a report template based approach – This is easier for both the ITE to complete and for the Delivery Body to assess whilst still confirming a similar level of checks from one ITE to another. All ITE areas considered which are:
 - Total Project Spend
 - Financial Commitment Milestone
 - Extended Years Criteria
 - Long Stop Date Extension
 - Operational
 - DSR Partial Credit Cover Release
 - Construction Progress Remedial Plan
- No changes suggested to the timescales for the ITE reports, and any additional declarations are seen as being implicitly required to make informed declarations under the existing CM Rules

CMAG Drafting Question – SCM/Operational

- Review of the SCM/Operational ITE requirements and discussions with EMR DB have identified the following:
 - What is commonly known as the SCM ITE Report (which is the Operational ITE Report in the legal text) contains requirements for an ITE to specify both:
 - De-rating Factor for relevant Generating Units; and
 - De-rated Capacity for the CMU.
 - Current EMR DB SCM ITE Report templates contain a requirement to include both of these items.
 - The CM Rules do not contain a requirement for ITEs to specify these values.
 - In the current drafting these have been marked as an optional field.
 - The subgroup operated on the principle that any additional declarations are seen as being implicitly required to make informed declarations under the existing CM Rules.

Q: Should these items be mandatory in the legal text or should this be considered as part of a separate Change Proposal?

- The subgroup operated on the principle that any additional declarations are seen as being implicitly required to make informed declarations under the existing CM Rules. If this is included in the legal text this would not be in line with this principle.
- If the case is strong and aligns with existing industry practice and expectation it may be more efficient to include in this Change Proposal.

Legal Text Review

- Legal Text was circulated on 10 September 2024 to CMAG Members and Subgroup Members for review. [Key comments and questions received will be summarized and presented to CMAG at the meeting]
- The deadline for comments on the legal text is Tuesday 24 September 2024
- Do CMAG Members have any additional comments on the legal text that they wish to raise?

CP382 INDEPENDENT TECHNICAL EXPERT DEFINITION
UPDATES AND REPORT TEMPLATES

CP382 – Specific Questions

Question	Comments
Does the CP further the CM Rules Change Objectives?	<p>The Proposer believes that these changes provide additional assurance to projects in the Capacity Market, and this assurance will contribute to an improved quality of projects, ensuring only projects that meet the rule requirements progress and are awarded multi-year contracts. This will ultimately lead to better value for money for consumers (Ofgem’s Principal Objective).</p>
Are there any related changes to the CM Rules in the pipeline?	<p>The Subgroup have highlighted the following areas for further consideration by the CMAG:</p> <p>Clarifications on the use of Total Project Spend - There is currently ambiguity over TPS at Application changing for FCM</p> <p>Foreign Currency Transaction treatment – There is currently no specified methodology in how foreign currency transactions should be treated (IAS21).</p> <p>Review of the Remedial Plan ITE provisions – Fundamental concerns have been raised as to the suitability of these provisions.</p> <p>Extended Years Criteria Review – Issues with pertinent definitions and whether certain provisions should apply on a Generating Unit or CMU basis were identified.</p>

CP382 – Specific Questions

Question	Comments
Does the CP impact on the Regulations?	No impacts on the Regulations have been identified
Are there any impacts on any other central industry frameworks or obligations?	No impacts on any other central industry frameworks or obligations have been identified

CP382 – Standard Questions

Question	Comments
<p>Are there any impacts on consumers, and if so, what are the impacts?</p>	<p>These changes provide additional assurance to projects in the Capacity Market, and this assurance will contribute to an improved quality of projects, ensuring only projects that meet the rule requirements progress and are awarded multi-year contracts. This will ultimately lead to better value for money for consumers.</p>
<p>Does CMAG agree with the proposed solution?</p> <p>Are there any suitable alternative solutions to address the defect?</p>	<p>To be discussed within CMAG</p>

CP382 – Standard Questions

Question	Comments
What are the expected impacts and implementation/ enduring costs for CM Participants?	<p>Proposer Comment The CMAG subgroup believes the impact on participants will be limited. Ultimately participants are responsible for appointing appropriate ITEs and these improved reports should level the playing field between different ITEs, ensuring providers will know what kind of checks to expect and provide confidence that a report will be suitable for submission.</p> <p>CMAG Questions Does the CMAG need to consult to determine the possible CM Participant impacts?</p> <p>If not, what are the impacts on CM participants?</p>
What are the expected impacts and implementation/ enduring costs for Delivery Partners	<p>Proposer Comment These changes do not give the Delivery Body any further responsibilities to judge the decisions from an ITE, as intended, but do prescribe a minimum level of detail which is much more robust than existing rule wording. These reports will take the Delivery Body more time to assess but this is seen as valuable for the additional assurance provided.</p> <p>CMAG Questions Is an EMR DB Impact Assessment required?</p>

CP382 - Standard Questions

Question	CMAG Comment
What are the expected timescales for implementation?	To be discussed within CMAG
Does the draft legal text deliver the intention of the solution?	To be discussed within CMAG
Does the CMAG recommend to Ofgem that the change be made?	TBC

CP382 - Standard Questions

Does the CP further the CM Rules Change Objectives and/or Ofgem's Principal Objectives?
(Yes, No or Neutral)

Ofgem's 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
- (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

Proposer View

The Proposer believes that these changes provide additional assurance to projects in the Capacity Market, and this assurance will contribute to an improved quality of projects, ensuring only projects that meet the rule requirements progress and are awarded multi-year contracts. This will ultimately lead to better value for money for consumers (Ofgem's Principal Objective).

ITE REPORT REQUIREMENTS SUBGROUP UPDATE –
NEXT STEPS

Next Steps

- Legal text final review comments deadline on 24 September 2024
- Further consideration at CMAG 25 on 15 October 2024



CMAG FORWARD WORKPLAN

CMAG Forward Work Plan

Title	2024		2025						Commentary
	September	October	November	December	January	February	March	April	
CP378 - Removing the 50MW Limit within a CMU Portfolio									Change Proposal Report being drafted by CMAG Secretariat. Separated out from proposal CP377 for further discussion.
CP380 - Financial Commitment Milestone Extension									Reviewing options for extending FCM deadline for an agreement arising from a T-4 auction. Certain Generating Technology Classes could be disadvantaged by current requirements.
CP381 - Definition of SCEC when determining Connection Capacity									Change Proposal Report being drafted by CMAG Secretariat. Proposal to determine Station Connection Entry Capacity.
CP382 'ITE Report Requirements'									CMAG agreed to review the ITE Reporting Requirements. This proposal intends to improve the ITE requirements in the CM Rules.
Clarify the scope of Rule 8.5.1 for Interconnectors									Review Rule 8.5.1 to take into consideration possible System Operator restriction on Interconnector Net Output
DSR Bespoke Metering Tests									A number of concerns have been raised by the ESC and some Capacity Providers in relation to Metering requirements for bespoke metering, reporting and assurance.
Full review of the Exhibits in the CM Rules									Ofgem wishing to conduct review of all Exhibits. Amendments to be implemented in Rules (Amendment) 2025
Rule 3.5 Connection Capacity Review									The aggregate Connection Capacity of all Generating CMUs at a site with a common Connection Agreement should not exceed the Transmission Entry Capacity and Maximum Export Capacity (as applicable) which applies to that site.
Total Project Spend									Separated out from ITE subgroup
Foreign Currency methodology for Capex									Separated out from ITE subgroup
Remedial Plan Review									Separated out from ITE subgroup
Extended Years Criteria Review									Separated out from ITE subgroup
EPT / SPD Review									Issues to be considered for grouping into Change Proposals: Amend Rules where granularity should be by Generating Unit or DSR Component rather than by CMU, even if the outcome is then aggregated by CMU [impacts ITE, Connection Capacity, SPD/EPT, etc.]; Ensure 3.5 Connection Capacity (CC) covers pertinent scenarios, including multiple CMUs on a site and CMUs comprising GU/Components from multiple sites, as well as DC CMUs where the basis of CC may vary between GUs; Replace 3.5.1A with an effective Site level control over CMU Connection Capacities. Clarify GCA/DCA and Connection Capacities around Refurbishing CMUs; Make 13.4A demonstrating extended performance (EPT) work more effectively;
Wider consideration of use the use of Agents - (CP376 follow up)									Looking at wider CM roles such as NEDs/consultants/advisers and whether there are any cases where sensitive information relating to bidding behaviour could potentially be shared inappropriately between parties. At CMAG#15 Ofgem noted they are considering a broader issue of how much information is shared between parties and how transparent this is, looking at data flows and bidding behaviours prior to Auction, which could feed in to future reviews with DESNZ
Prequalification Updates									General area of consideration flagged by CMAG in it's initial view of issues
Housekeeping Changes									Administrative changes for the Spring 2025 consultation, To be implemented for Rules (Amendment) 2025.

Key	
	Pre-raise Consideration
	Development
	Initial Consideration of Proposal
	CMAG Recommendation
	With Ofgem
	On hold

CMAG Forward Work Plan

- The following changes are currently with Ofgem to consult on:
 - [CP362 'CM Agreement Transfers'](#)
 - [CP364 'Allow Secondary Trading from T-4'](#)
 - [CP371 'Protection from very late Network Connections'](#)
 - [CP376 'Clarifying the restrictions on the role of Agent'](#)
 - [CP377 'Increasing Flexibility for SPD Portfolios'](#)

- The following changes are currently with Ofgem for decision:
 - [CP372 'Change to Rule 4.4.4'](#)
 - [CP374 'Splitting Capacity Market Units'](#)
 - [CP375 'Merging Capacity Market Units'](#)

CMAG Forward Work Plan

Title	2024				2025				Commentary
	September	October	November	December	January	February	March	April	
CP362 - CM Agreement Transfers									CMAG recommended to Ofgem that CP362 be approved
CP364 - Allow Secondary Trading from T-4									
CP371 - 'Management of connection delays by network companies'									The CMAG recommended to Ofgem that the CP371 solution be implemented
CP372 - 'Change to Rule 4.4.4'									The CMAG agreed not to progress further with this on the basis that DESNZ expect to lead on this work as part of its Phase 2 consultation. CMAG discussions including the outcome of the industry survey will be presented to Ofgem and DESNZ.
CP374 - 'Splitting CMUs'									CMAG agreed not to progress the proposal at Meeting 15 as there was a significant risk this proposal was contrary to the Regulations and policy intent (as expressed by DESNZ at CMAG Meeting 14), seen as a low priority (due to likely impact of the issues applying to a low number of sites) and work could be superseded by the wider review of Rule 4.4.4
CP375 - 'Merging CMUs'									CMAG agreed not to progress the proposal at Meeting 15 as there was a significant risk this proposal was contrary to the Regulations and policy intent (as expressed by DESNZ at CMAG Meeting 14), seen as a low priority (due to likely impact of the issues applying to a low number of sites) and work could be superseded by the wider review of Rule 4.4.4
CP376 - Clarifying restrictions on the role of Agents									CMAG Recommended that CP376 be implemented
CP377 - 'Increasing Flexibility for SPD Portfolios'									After splitting out the 50MW limit element, CMAG recommended that CP377 be implemented

Key	
	Pre-raise Consideration
	Development
	Initial Consideration of Proposal
	CMAG Recommendation
	With Ofgem
	On hold

CMAG Forward Work Plan

Title	2024				2025				Commentary
	September	October	November	December	January	February	March	April	
CP356 - Facilitate Secondary Trading before CMU Termination									To be considered as part of CMAG's wider review of secondary trading. The Proposer has agreed to keep this change on hold, pending the outcome of CM Rules Change Proposal CP364
CP363 - Changes to EMR Delivery Body Portal									The Proposer has agreed to keep this change on hold. EMR DB to review and advise following Portal 2.0 roll out.
CP370 - Changes to Extended Performance Test									At CMAG Meeting 7, DESNZ and Ofgem highlighted the policy interactions with CP367. It was agreed this Proposal would be discussed offline and not be progressed further by CMAG due to the interactions with policy
CP379 - Confidential Information Definition									CMAG agreed at Meeting 23, no action was required of CMAG Secretariat and the sharing of confidential information on Exhibit C would be picked up in the general Exhibit review.
CPXXX - DSR Component Reallocation									On hold pending outputs of DESNZ Phase 2 consultation work
CPXXX - Rule 2.3.3 De-rating Factors									Ofgem/DESNZ/EMR-DB in discussions to clarify policy intent
CPXXX - Extension of Secondary Trading Principles for Extended Performance Testing									Placed on hold as this is expected to be considered by DESNZ separately.
CPXXX - Managing SPDs and Secondary Trading									Number of changes expected in July, as per DESNZs decision on Phase 2 consultation. Any legal drafting cannot begin until then.

Key	
	Pre-raise Consideration
	Development
	Initial Consideration of Proposal
	CMAG Recommendation
	With Ofgem
	On hold



ACTION LOG

Action Log

- [Link](#)



AOB AND MEETING CLOSE