

Capacity Market Advisory Group (CMAG) Briefing

Date	2 December 2024	Classification	Public
CP or Subject	CP373 Audit follow-up Surgery Items and Housekeeping	Document version	Draft

Objectives

- To review the original points raised during a review of the 2023 Rules in preparing proposed changes under CP373 change of role from DB to CMSB for metering related functions, comparing those against the subsequent CP373 Report legal text, Consultation, Decision and actual Rules changes for 2024 – highlighting any discrepancies and outstanding comments.

Overview

- Outstanding queries
 - Q1 **[Delivery Partners]** Can the comments from the Aug-Sep 2023 review of Rules 2023 be left in this Briefing when circulated to CMAG for review?
 - Q2 **[CMAG Secretariat]** Should the issues not adopted as Surgery Items by CMAG26 be left in this Briefing, even though the issues have not all been ‘worked up’?
- Key Findings (37+10 items) [\[Reference to CMAG26 slides v2.0 slide number \[nn\]\]](#)
 - Housekeeping
 - 1 Proposed administrative corrections to changes (13 items +6 since CMAG26).[\[34\]](#)
 - Potential Surgery Items¹ by Theme
 - Adopted by CMAG26
 - 2 Consequences of implementing CP373 (5 items) [\[37-41\]](#)
 - 3 Metering Configuration (2 items) [\[42-43\]](#)
 - 4 LSD deadlines (1 item) [\[50\]](#)
 - 5 Terminology on Capacity Provider and Sch 6 (1 item +1 since CMAG26) [\[44\]](#)
 - 6 Reconfiguration of a CMU (1 item +1 and several DQs since CMAG26) [\[45\]](#)
 - 7 Format and Content of the CMMR (1 item +1 since CMAG26) [\[35\]](#)
 - Appendix EMRS implementation of the CMMR (4 items) [\[35/36\]](#)
 - 8 Data Retention policy (1 item) [\[52\]](#)
 - 9 DSR Alternative Delivery Periods (1 item) [\[53\]](#)
 - Not Adopted by CMAG26
 - 10 DSR CMU Component Register (6 items) [\[46\]](#)
 - 11 DSR Tests (2 items) [\[47-48\]](#)
 - 12 SPD and EPT (2 items) [\[49\]](#)
 - 13 SO v DB provision of information (1 item) [\[51\]](#)
 - 14 Terminology on Rx/Rb (1 since CMAG26) [\[44\]](#)
- Recommendations
 - A summary of the above was presented at CMAG26 to obtain Member adoption of matters for future discussion as Surgery Items, that may lead to subsequent Change Proposals.

¹ Including copies of text from original CP373 legal text review and related comments.

Analysis – Adopted as Surgery Item by CMAG26

1. Housekeeping [CMAG26 slide 34]

1.1 Rule 1.2 Definitions

1.1.1 Capacity Provider – capitalise 'Transferee' as a defined term

1.1.2 Capacity Market Metering Register – capitalise 'Approved Metering Solutions' as a defined term

1.1.3 CM Settlement Body Portal – capitalise 'Approved Metering Solutions' as a defined term

1.2 Other Rules

1.2.1 Rule 4.4.2 Prequalification Criteria (as previously raised by Eleanor and discussed at CMAG23)

a) 4.4.2(c) make **Omitted** as originally proposed

b) 4.4.2(d) make **Omitted** as originally proposed

1.2.2 [6.1.2(a) Added since CMAG26] [DQ make 7.4.1(d)(ix) 'Omitted'?]

1.2.3 [6.1.2(b) Added since CMAG26] [DQ make 7.4.1(d)(xii) 'Omitted'?]

1.2.4 [6.1.2(c) Added since CMAG26] [DQ make 7.4.1(d)(xvi) 'Omitted'?]

1.2.5 [6.1.3 Added since CMAG26] Rule 7.5.1(ee) make **Omitted** as now duplicates 7.5.1(n) since 8.3.6(c) omitted.

1.2.6 [6.1.4 Added since CMAG26] Rule 7.5.1(na) make **Omitted** as now duplicated by 7.5.1(ff).

1.2.7 [Added since CMAG26] Rule 7.5A insert '**CM**' before 'Settlement Body'

1.2.8 Rule 8.3.3(c) Metering Assessment requires Metering Test

a) 8.3.3(c)(i) make **Omitted** instead of simply deleted

b) 8.3.3(c)(ii) make **Omitted** instead of simply deleted

1.2.9 Rule 8.3.3(d) Obtain Metering Test

a) 8.3.3(d)(i) delete 8.3.3(c)Ⓜ leaving just 8.3.3(c)

b) 8.3.3(d)(ii) delete 8.3.3(c)Ⓜ leaving just 8.3.3(c)

1.2.10 Rule 9.2.4 inserted text about CMMR should be within the () relating to CMR

a) 'in each case such transfer of the Capacity Agreement to be in accordance with the Regulations and the Rules (including the requirements relating to the updating of the Capacity Market Register) and the Capacity Market Metering Register.'

1.2.11 Rule 13.2.12E insert '**CM**' before 'Settlement Body'

1.2.12 Rule 13.2B.20 insert '**CM**' before 'Settlement Body'

1.2.13 Rule 13.2B.23 insert '**CM**' before 'Settlement Body'

[The above have been confirmed as still valid after R(A3)2024]

2. Potential Surgery Items related to Consequences of implementing CP373 [CMAG26 slides 37-41]

2.1 Background

- 2.1.1 Implementation of CP373 has resulted in a number of key changes that have consequential impacts, eg
- a) Instead of some metering information being provided as part of Prequalification via the DB Portal such information is now submitted later and via the CMSB Portal.

2.2 Rule 3.12.1 Declaration about metering

3.12 Declaration to be made when submitting an Application

3.12.1 A person submitting an Application or an Opt-out Notification must ensure and confirm in the Application or the Opt-out Notification that:

- (a) in all material respects, the Application or Opt-out Notification and, in the case of an Application, all Additional Information submitted by the Applicant; and
- (b) in all respects, each of the specific declarations referred to in Rules 3.4 to 3.11 (where relevant),

is true and correct (or, to the extent that the Additional Information is a copy document, that it is a true and correct copy) and that the Application and Additional Information has been authorised by the board of directors of the Applicant or the person submitting the Opt-out Notification (as applicable).

Rule 1.2 Definitions has

Metering Assessment means a questionnaire relating to the metering arrangements for a CMU, hosted on the CM Settlement Body Portal

Metering Statement means a statement provided which must include, as applicable, the metering information set out in Schedule 6 of the Rules, which includes at (r) a declaration which includes 'true, complete and accurate' but not 'authorised'

Rule 13.3.2(b) only requires a Metering Statement if a Metering Test is required by CMSB, or under Rule 13.5.3(e) Site Audit.

2.2.1 So if a Metering Test or Site Audit is not required there will be no declaration concerning metering information.

2.2.2 Should the CMSB Portal include a Declaration similar to 3.12.1 'true and correct', as it may pertain to an AMS and related CM Aggregation Rules?

2.3 Rule 13.3.2(a) CP notifies CMSB that MT required

13.3.2 A Capacity Provider for a CMU that is subject to a Metering Test must:

- (a) notify the CM Settlement Body that it requires a Metering Test to be carried out with respect to that CMU; and
- (b) at the same time, submit a Metering Statement setting out the Metering Configuration Solution that each Generating Unit or DSR CMU Component comprised in the CMU, or the Electricity Interconnector comprised in the Interconnector CMU, is to be tested against.

2.3.1 However, the updated 8.3.3(c) has moved the responsibility for determining if a MT is required from DB to CMSB

8.3.3(c) Following the completion of a Metering Assessment pursuant to Rule 8.3.3(a), (b) or (ba), or 8.3.4(h)(i)(bb) (and following the completion of amendments made to a Metering Assessment, pursuant to Rules 3.6.4(d), 3.6A.3(c), 3.9.4(d), or 8.3.3(h) where applicable) the **CM Settlement Body** must notify the relevant Capacity Provider and the Delivery Body whether or not, based on such Metering Assessment, the metering arrangements for such CMU will be subject to a Metering Test:

2.3.2 Does CMSB determine if MT required, informs CP, then under this Rule CP then advises CMSB?

2.3.3 Should a future Surgery Item consider making 13.3.2(a) 'Omitted'?

2.4 Rule 8.3.3(da) CMSB advise DB of MT Certificate

Inserted

8.3.3(da) The CM Settlement Body must notify the Delivery Body within five working days from the date that a Metering Test Certificate has been issued to the Capacity Provider, including confirmation of the date that the Metering Test Certificate was awarded.

Existing

13.3 Metering Test

:

13.3.10 The CM Settlement Body shall notify the Delivery Body of the outcome of any Metering Test carried out pursuant to this Rule 13.3 and confirm the date that the Metering Test Certificate was awarded.

2.4.1 Should a future Surgery Item remove such duplication?

2.5 Rule 8.3.3(e) Deadline for MT

8.3.3(e) The date by which a Capacity Provider must be awarded ~~provide~~ a Metering Test Certificate where required to do so under Rule 8.3.3(d) is:

2.5.1 Different responsibility depending on wording

a) 'be awarded' = CMSB responsibility

b) 'obtain' = Capacity Provider responsibility

2.5.2 Should a future Surgery Item consider changing 'be awarded' to 'obtain'?

2.6 Rule 13.2.6(a) DSR Test meter volumes before Prequalification

13.2.6 Following the submission of the information referred to in Rule 13.2.5 above, the Applicant or Capacity Provider (as applicable) must for each DSR CMU either:

(a) prior to Prequalification only, provide

(i) historic information to the Delivery Body that identifies three separate Settlement Periods or DSR Alternative Delivery Periods within the 2 years prior to the start of the Prequalification Window in which:

(aa) a Baseline Demand can be calculated for each DSR CMU Component of the DSR CMU; and

(bb) the DSR CMU delivered a positive DSR Volume (net of any related imports) in discharge of an obligation to deliver a balancing service;

(ii) a calculation of the DSR Volume of the DSR CMU which is thereby evidenced in each such Settlement Period or DSR Alternative Delivery Period, including the adjustment for Line Loss Factors, the lowest of which will be doubled to determine the Proven DSR Capacity of the DSR CMU; and

(iii) a letter from the Distribution Network Operator confirming the Line Loss Factor methodology statement and calculated values in the three periods identified pursuant to Rule 13.2.6(a), and, where applicable, a letter from the owner of the Unlicensed Network confirming the electrical loss factor methodology statement and calculated values in the three periods identified pursuant to Rule 13.2.6(a); or

(b) give the Delivery Body no less than 2 Working Days' notice of its intention to test activate the DSR CMU and of the Settlement Period in which such activation will be carried out.

2.6.1 See also 13.2B.2(a) re Joint DSR Test before Prequalification

2.6.2 See also 13.2B.6 re Joint DSR Test before Prequalification

2.6.3 Does 'prior to qualification only' mean that the data relates to Settlement Periods before the Prequalification Window, but can be submitted at any time, or that the data can only be submitted during the Prequalification Window?

2.6.4 Should a future Surgery Item consider removing 'prior to qualification only'?

3. Potential Surgery Items related to Metering Configuration [CMAG26 slides 42-43]

3.1 Background

3.1.1 Defined Terms in the Rules include

Approved Metering Solution [AMS]	means (a) a Metering Configuration Solution (including CM Aggregation Rules) approved by the CM Settlement Body which is an arrangement of Metering Equipment for: (i) a Generating Unit that is not a BM Unit; (ii) a DSR CMU Component that is not a BM Unit; or (iii) a CMU that is a partial BM Unit; or (b) a Metering Configuration Solution in respect of a Generating Unit or DSR CMU Component where such Metering Configuration Solution is comprised of a BM Unit that is registered in the Central Meter Registration Service in accordance with the BSC and CM Aggregation Rules are in place
Balancing Services Metering Configuration Solution	means a Metering System installed to comply with one of the following Relevant Balancing Services: (a) Short Term Operating Reserve; (b) Frequency Control by Demand Management; or (c) Firm Frequency Response
Bespoke Metering Configuration Solution	means a Metering System using additional on-site Meters to demonstrate output behind the pre-existing Meter Point which is installed to comply with the Bespoke Technical Requirements
Bespoke Technical Requirements	means the technical requirements for the Bespoke Metering Configuration Solution set out in Schedule 7 containing technical information relating to Meter Points, measured quantities and demand values for Metering Systems, Metering Equipment criteria and commissioning, records and proving
BM Unit	has the meaning given to that term in the BSC
Boundary Point	means: (a) for a Generating CMU, any point at which any plant or apparatus not forming part of the Total System is connected to the Total System; (b) for an Interconnector CMU, any point at which any plant or apparatus forming part of the Electricity Interconnector is connected to the GB Transmission System
Capacity Market Metering Register [CMMR]	means a register maintained by the CM Settlement Body to record approved metering solutions and related information, metering related obligations set out in Chapter 7 for each CMU and DSR Component Reallocation set out in Chapter 8.3.4 from time to time
CM Aggregation Rules	for an Approved Metering Solution means the formula used to calculate relevant volumes for any Settlement Period

CM Settlement Body Portal	means the IT online service through which relevant Rules are administered by the CM Settlement Body or its agents. Pursuant to which, without limitation, information pertinent to an approved metering solution and all notifications to be made by, or to, the CM Settlement Body in relation to the relevant Rules must be submitted
Meter	means a device for measuring Active Energy and/or Active Power
Meter Point	means a Metering System connection point between an Interconnector CMU or a Generating Unit and/or DSR Component and: (a) for an Interconnector CMU or a Transmission CMU, the Transmission Network; (b) for a Distribution CMU, the relevant Distribution Network; (c) for a CMU on an Unlicensed Network, the relevant Unlicensed Network; or (d) for a CMU within a Customer site, the connection point to the Customer site behind the existing site Boundary Point
Meter Point Administration Number	means the unique identification number assigned (and maintained) by a DNO in relation to a Meter Point
Metering Assessment	means a questionnaire relating to the metering arrangements for a CMU, hosted on the CM Settlement Body Portal
Metering Configuration Solution	means, as applicable, any one of the following: (a) Balancing Services Metering Configuration Solution; (b) Bespoke Metering Configuration Solution; or (c) Supplier Settlement Metering Configuration Solution
Metering Equipment	means Meters, Measurement Transformers, metering protection equipment including alarms, circuitry, associated Communications Equipment, Settlement Instations and Outstations and wiring, transducers, supervisory control and data acquisition meters, power line communications, analogue, power and pulsing metering and shall include any customer meter and associated Metering Equipment
Metering Site	means the location of the Metering Equipment of a Generating Unit, DSR CMU Component or Electricity Interconnector comprised in a CMU
Metering Statement	means a statement provided which must include, as applicable, the metering information set out in Schedule 6 of the Rules [Only required for those CMUs subject to a Metering Test, as determined by CMSB under 8.3.3(c)]
Metering System	has the meaning given to that term in the BSC
Supplier Settlement Metering Configuration Solution	means a Metering System that uses a supplier's Half Hourly Metering System by using Half Hourly Data Aggregators to collect metered data

3.1.2 Some Rules already required AMS, eg

a) 11.3.5D(b)(i)(cc) CMSB must determine if the metering arrangements for a Metering Test (MT) are an AMS;

- b) 13.2.5(b)(ii) DSR Test or 13.2B.5(b)(ii) Joint DSR Test, where there is no MT, confirmation of AMS;
- c) 13.3.1, 13.3.6(a)(iii) and 13.3.6B(a)(iii), MT for metering arrangements that constitute an AMS
- 3.1.3 With CP373 the AMS is required in more places:
- a) CMMR is specifically required to record AMS;
 - b) CMSB to have CM Aggregation Rules for the AMS;
 - c) CMSB Portal to record information pertinent to AMS;
 - d) 8.3.3(i) requires and CMU Transferee to evidence an AMS 5WD prior to the DY; or
 - e) 9.2.5(ba)(i) the Transferee has evidenced an AMS before submitting a PTCO-in to DB.
- 3.1.4 The continuing reference to MPANs or BMUs in some Rules appears out of synch with the ultimate requirement for AMS.
- 3.2 **Rule 3.11.2B Opt-out Notification MPANs**
- 3.11.2B Pursuant to 3.11.2 (d) following provision of an Opt-out Notification, a Mandatory CMU must provide Meter Point Administration Numbers for all the relevant Meters to the CM Settlement Body prior to the relevant Delivery Year.
- 3.2.1 Should 'Meter Point Administration Numbers for all the relevant Meters' be replaced by 'an Approved Metering Solution'?
- 3.3 **Rule 7.4A.1(b) Metering data**
- 7.4A.1(b) Metering data:
- i. the Meter Point Administration Numbers for the relevant Meters relating to the CMU;
 - ii. whether the Capacity Provider is subject to a requirement to complete a Metering Assessment [V] and, if so, the date by which it must be completed [K]
 - iii. where applicable, the date on which a valid Metering Test Certificate was awarded [W] to a CMU within 5 days of completion
 - iv. the responses submitted in the Metering Assessment within 5 days of completion
 - v. Confirmation based on the results of the Metering Assessment on whether a Metering Test is required [U] within 5 days of completion
 - vi. BM Unit ID [I] and other identification codes for the relevant Meters
 - vii. to record any changes to the Meter Point Administration Numbers, BM Unit IDs and other identification codes for the relevant Meters relating to the CMU within five Working Days following approval
 - viii. Status of a DSR Component in accordance with Rule 8.3.4.
- 3.3.1 See the Appendix relating to the EMRS published CMMR [see CMMR column above/below]. However, this:
- a) Includes, appropriately metering per GU/Component whereas (i) above is per CMU;
 - b) (iv) above specifies the 'responses to the MA', yet there is no specific requirements for what information has to be provided in the MA which as defined as 'means a questionnaire relating to the metering arrangements for a CMU, hosted on the CM Settlement Body Portal';
 - c) EMRS G25 'My EMRS User Guide', section 10 'Capacity Market Metering', then sets out the MA 'questions'
 - Select which of the four metering pathways [N]
 - Description of Metering Arrangements [P]
 - If applicable, BSC approved Metering Dispensation reference number [Q]
 - Any connections to the CMU Component that are not part of the MEIDs in aggregation rules [R] [This implies the aggregation rules must be entered first, as indicated in G25]
 - Any ineligible generation behind a Meter Point MEID [S]

- Meter used for other purposes [O]
 - Using BSC Settlement (BMU or D0357 MPAN) for all metered data [T]
- d) Rule 7.4A.1(b)(vi) requires BMU ID ‘and other identification codes for the relevant meters’ while G25 also details the ‘aggregation rules’ (as used for bulk upload), comprising some of

- Meter configuration [N]
- BME ID
- BMU ID [I]
- Interconnector ID
- LDSO ID
- LLFC ID
- Meter Share
- MPAN [H]
- MSID [J]
- Boundary MPAN
- Boundary BMU ID (MSID)

3.3.2 Should those ‘other identification codes for the relevant meters’ used for the aggregation rules (but not already matched to a CMMR column) be made public in the CMMR?

- BME ID
- Interconnector ID
- LDSO ID
- LLFC ID
- Meter Share
- Boundary MPAN
- Boundary BMU ID (MSID)

3.4 Rule 8.3.3(f)(i) Metering details

8.3.3(f) A Capacity Provider or CMVR Registered Participant must:

- (i) Provide to the CM Settlement Body as soon as reasonably practicable and ensure the accurate submission of the following information to the CM Settlement Body as applicable;
 - (aa) All relevant Meters, and Meter Point Administration Numbers, for all the relevant Meter(s),
 - (bb) BM Unit Identifiers (as defined in the Balancing and Settlement Code), if applicable; and
 - (cc) in the case of an Interconnector CMU, the relevant interconnector identifier(s) as specified for the purposes of the BSC in file CDCA- I041 of the Central Data Collection Agent (CDCA).
 - (dd) If any Meter Point Administration Number specified has already been registered to another CMU which is a Capacity Committed CMU in respect of one or more of the same Delivery Years, include a declaration explaining how the two CMUs relate and how metering will separately identify the output of each of them.

3.4.1 Instead of specific details by meter type in each Rule, Rules could refer to Metering Configuration Solution and Approved Metering Solutions?

3.5 Rule 8.3.3(f)(ii-iv) Changes in metering

8.3.3(f) A Capacity Provider [ie Capacity Committed] or CMVR Registered Participant must:

:

8.3.3(f)(ii) notify the CM Settlement Body in advance of any proposed change to:

(aa) the metering configuration for any Generating Unit or DSR CMU Component, or any Interconnector CMU;

[DN undefined 'metering configuration' could be 'Metering Configuration Solution'.]

(bb) the arrangements specified in the information provided pursuant to Rule 3.4.3; or

[DN At Application, 3.4.3(ii) metering and (iv) Interconnector ID already removed by CP373. Although (iii) BMU was retained, it is not part of a MCS at that point.]

(cc) the arrangements specified in the information provided pursuant to Rule 8.3.3(ea).

[DN MCS by GU/Comp for a Capacity Committed CMU]

8.3.3(f)(iii) obtain the prior confirmation of the CM Settlement Body that such proposed changes:

(aa) will meet the standards required at Prequalification; and

[DN 'at Prequalification' should be deleted]

(bb) in the case of a DSR CMU or a DSR CMU Component, will not affect its ability to determine the Baseline Demand with accuracy on a Settlement Period basis;

[DN insert before DSR 'Generating Unit comprising a Storage Facility, ' and substitute 'with accuracy' by 'as set out in Schedules 2 or 2A'.]

8.3.3(f)(iv) in the case of a proposed change pursuant to paragraph (ii)(aa) above, obtain a Metering Test Certificate for the DSR CMU with the new metering configuration after the change has taken effect;

[DN Should this be for any GU or DSR Component (ie not Interconnector) but only for Bespoke Metering Configuration Solution?]

3.5.1 Should the above proposed changes to (ii)(aa), (iii)(aa)/(bb) and (iv) be discussed as a Surgery Item?

3.5.2 Rule 8.3.3(f) does not address the 'edge case' of changes in metering by a Prequalified CMU without a Capacity Commitment or a Secondary Trading Entrant (ie has passed prequalification criteria outside of a Prequalification Window) between them completing a Metering Assessment and them becoming Capacity Committed by PTCO-in being approved by DB and entered in the CMR for the pertinent Auction.

3.5.3 Should these issues be discussed as a Surgery Item?

3.6 Rule 8.3.7(b)(i) notifying CoA to CMSB – metering

8.3.7 Notifying change of address

:

(b) A Declaration that the Capacity Provider will notify the CM Settlement Body as soon as reasonably practicable and, in any event, within 5 days of Notifying change of address to:

(i) Provide Meter Point Administration Numbers of the relevant Meter(s) at the new location and, where a MPAN is already in use by another CMU, a declaration that explaining the relationship between these CMUs and the metering solutions necessary to identify their individual outputs

3.6.1 Should a Surgery Item discuss replacing this Rule with one based on MCS/AMS?

3.7 Rule 9.2.6(cc) Acceptable Transferee metering and 10.2.1A CMVR Registered Participant

9.2.6 An Acceptable Transferee in relation to Rule 9.2.4(a), for any Delivery Year, is any of the persons in paragraphs (a) to (d) who meets the conditions in Rule 9.2.6(e)(i) to (xii):

:
(e) the conditions in this Rule 9.2.6(e) are that:

:
(ii) the CMU Transferee:

:
(cc) has provided metering information, completed a Metering Assessment, and where applicable holds a Metering Test Certificate with the CM Settlement Body.

:
10.2 Capacity Market Volume Reallocation Notification

:
10.2.1A Before becoming a CMVR Transferee, the CMVR Registered Participant must provide metering information to the CM Settlement Body, complete a Metering Assessment and, where applicable, hold a Metering Test Certificate.

3.7.1 Change 'metering information' to 'Approved Metering Solution'?

3.8 Rule 13.2.5(a) Metering required for DSR Tests

13.2.5 (a) the Meter Point Administration Number(s) of the meters for that site and/or connection point, and details of any other meters necessary to identify and monitor the DSR from any DSR CMU Component in relation to the DSR CMU; and

(b) with regard to a DSR CMU that is not a BM Unit either:

- (i) the Metering Test Certificate for the DSR CMU, in which case each DSR CMU Component comprised in the DSR CMU will be measured against the metering configuration specified for that DSR CMU Component in the Metering Test Certificate; or
- (ii) where no Metering Test Certificate has been issued for the DSR CMU, confirmation of the Approved Metering Solution that each DSR CMU Component is to be measured against.

13.2.5A The CM Settlement Body must confirm to the Delivery Body that they have received information required in accordance with 13.2.5(a) or 13.2.5(b).

3.8.1 See also equivalent 13.2B.5 Joint DSR Test

3.8.2 Should MPAN etc be replaced by MCS/AMS?

3.8.3 Should responsibility for DSR Test stay with DB or move to CMSB?

3.9 Rules Sch 6 (a) requirement for Single Line Diagram (SLD)

SCHEDULE 6: METERING STATEMENT

:
(a) **Single Line Diagram** – to determine that the Metering System is at the Meter Point and to measure the Metered Volume of the CMU. The single line diagram must show all CMU components and all connections to the Total System, as applicable.

3.9.1 Although the requirement to provide SLD has been removed from several specific Rules it remains as a core requirement of Sch 6, when the Elexon Metering Team have indicated that SLD would only be needed when Sch 7 Bespoke Technical Requirements is required.

3.9.2 Which means that for any CMU requiring a Metering Test a SLD would need to be provided as part of the Metering Statement.

3.9.3 Should a future Surgery Item consider moving the SLD requirement from Schedule 6 to Schedule 7 accordingly?

4. Potential Surgery Items related to LSD deadline [CMAG26 slide 50]

4.1 Background

- 4.1.1 The completion of a Metering Configuration Solution (MCS) on the CMSB portal (My EMRS) constitutes completion of a Metering Assessment (MA) as per Rules 1.2 Definitions.
- 4.1.2 Rules 8.3.3 covers the deadlines for completion of that MA and CMSB determining if a Metering Statement (MS) & Metering Test (MT) is required and when that must be completed.
- 4.1.3 At present, for a Prospective CMU, the deadline for a MA and MS/MT is the Long Stop Date (LSD).
- 4.1.4 However, a Prospective CMU can, under Rule 6.8.2, still meet its Minimum Completion Requirement (MCR) by achieving an Operational capacity of more than 50% of its Capacity Obligation within 120WD of a Notice of Intention to Terminate being issued after the LSD.

4.2 Rule 8.3.3(ba)/(h) deadline for MA, metering changes and 13.3.2A(e) MT notification deadline

8.3.3(ba) If a Prospective CMU is awarded a Capacity Agreement then the Capacity Provider must, as soon as reasonably practicable after the CMU becomes Operational, and in any event not later than the **Long Stop Date**:

- (i) not used
- (ii) complete a Metering Assessment in relation to the CMU.

:

8.3.3(e) The date by which a Capacity Provider must be awarded **provide** a Metering Test Certificate where required to do so under Rule 8.3.3(d) is:

:

- (iv) in the case of a Prospective CMU, as soon as reasonably practicable after the date on which the Capacity Provider receives notification under Rule 8.3.3 (d)(i), and in any event not later than the **Long Stop Date**; and

:

8.3.3(h) A Capacity Provider may amend a Metering Assessment completed in compliance with Rules 8.3.3(a), 8.3.3(b), or 8.3.3(ba) provided that:

:

- (iv) in the case of a Prospective CMU any amendments are made by the earlier of:
 - (aa) the earliest date the Capacity Provider provides any Metering Test Certificate; and
 - (bb) as soon as reasonably practicable after the date on which the Capacity Provider receives a notification under Rule 8.3.3 (d)(i), and in any event not later than the Long Stop Date.

:

13.3.2 A Capacity Provider for a CMU that is subject to a Metering Test must:

- (a) notify the CM Settlement Body that it requires a Metering Test to be carried out with respect to that CMU; and
- (b) at the same time, submit a Metering Statement setting out the Metering Configuration Solution that each Generating Unit or DSR CMU Component comprised in the CMU, or the Electricity Interconnector comprised in the Interconnector CMU, is to be tested against.

13.3.2A The notification and submission required by Rule 13.3.2 **[MS/MT]** must be given no later than:

:

- (e) in the case of a Prospective CMU, as soon as reasonably practicable after the date on which the Capacity Provider receives notification under Rule 8.3.3 (d)(i), and in any event not later than the Long Stop Date.

4.2.1 However, under Rule 6.8.2 a Prospective CMU can meet MCR within 120WD of the LSD.

6.8.2 Subject to Rules 6.8.2A to 6.8.2F, if the Delivery Body becomes aware of any New Build CMU that has failed to reach its Minimum Completion Requirement by the Long Stop Date, the Delivery Body must issue a written notice to the Capacity Provider, the Secretary of State, the CM Settlement Body and the Authority (a "Notice of Intention to Terminate") stating that, unless the Minimum Completion Requirement is achieved (as determined in accordance with Rule 6.8.3 or 6.8.3A) within 120 Working Days from the date of the Notice of Intention to Terminate, a Termination Notice will be issued in accordance with Rule 6.10.2(a).

4.2.2 The current Rules therefore mean that for a Prospective CMU a MA and MS/MT have to be completed by LSD, even if a Prospective CMU that has failed to achieve MCR/SCM by LSD and been issued with a Notice of Intention to Terminate will still have another 120WD to become Operational and achieve its MCR.

4.2.3 Such a CMU may not therefore have its MCS in place and hence be in a position to complete its MA and MS/MT, by the LSD, but can still achieve MCR within the 120WD.

4.2.4 It is therefore an option to consider a change to the Rules to allow a Prospective CMU that has received a Notice of Intention to Terminate under 6.8.2 to complete both MA and MS/MT within the 120WD (or such earlier time as CMAG might consider appropriate).

4.2.5 Potential wording for such changes might include:

8.3.3(ba) If a Prospective CMU is awarded a Capacity Agreement then the Capacity Provider must, as soon as reasonably practicable after the CMU becomes Operational, and in any event, **subject to Rule 8.3.3(k)**, not later than the Long Stop Date:

8.3.3(e)

(iv) in the case of a Prospective CMU, as soon as reasonably practicable after the date on which the Capacity Provider receives notification under Rule 8.3.3 (d)(i), and in any event, **subject to Rule 8.3.3(k)**, not later than the **Long Stop Date**; and

8.3.3(h)(iv)

(bb) as soon as reasonably practicable after the date on which the Capacity Provider receives a notification under Rule 8.3.3 (d)(i), and in any event, **subject to Rule 8.3.3(k)**, not later than the Long Stop Date.

8.3.3(k) **where a Prospective CMU has been issued with a Notice of Intention to Terminate under Rule 6.8.2 then the Capacity Provider may still complete a Metering Assessment and if required a Metering Statement and Metering Test in becoming Operational within the 120 Working Day deadline.**

[DQ should there be a 5-10WD gap between a deadline and the 120WD, eg to allow CMSB/DB to complete appropriate verification processes?]

13.3.2A

(e) in the case of a Prospective CMU, as soon as reasonably practicable after the date on which the Capacity Provider receives notification under Rule 8.3.3 (d)(i), and in any event, **subject to Rule 8.3.3(k)**, not later than the Long Stop Date.

5. Potential Surgery Items related to terminology [CMAG26 slide 44]

5.1 Background

5.1.1 As per Reg 2(1) Interpretation (since 2016/742) [defined terms in the Regs are not capitalised, but they are in the Rules]

“capacity provider” means the holder of—

- (a) a capacity agreement, or
- (b) a transferred part;

“capacity agreement” has the meaning given in regulation 30(1);

30(1) A “capacity agreement” comprises the rights and obligations accruing to a capacity provider under or by virtue of electricity capacity regulations and capacity market rules in relation to a particular capacity committed CMU and one or more delivery years.

“transferred part” has the meaning given in regulation 30A(3);

30A(3) For the purposes of this regulation, a “transferred part” comprises the rights and obligations accruing to the transferee in respect of a CMU where the capacity agreement (“the related agreement”) is transferred under paragraph (1)(b) or (2)(b). [PTCO under Rule 9.2.4(a), rather than transfer of ownership under 9.2.4(b)]

5.1.2 So Capacity Provider in the Rules excludes parties who do not yet hold a ‘capacity agreement’ or ‘transferred part’, ie:

- a) Acceptable Transferee (who is not a Capacity Provider);
- b) CMVR Registered Participant (an Acceptable Transferee, who is not a Capacity Provider)
- c) Secondary Trading Entrant (who are Existing/Proven CMUs who have not previously Prequalified for an Auction)

5.1.3 These groups, without a Capacity Obligation, will have no previous need to complete:

- a) a Metering Assessment (MA), under Rules 8.3.3(a) [Existing/Proven CMU with Capacity Agreement], 8.3.3(b) [Unproven DSR CMU], 8.3.3(ba) [Prospective CMU], 8.3.4(h)(i)(bb) [DSR added Component], ; and
- b) if needed, a Schedule 6 Metering Statement (MS) and Metering Test (MT).

5.1.4 However, an Acceptable Transferee is required by Rule 9.2.6(e)(ii)(cc) to have completed a MA (and if needed MS/MT) before it can register a PTCO-in with DB.

5.1.5 Similarly, a CMVR Transferee (ie Capacity Provider or CMVR Registered Participant) must also, under Rule 10.2.1A have completed a MA (and if needed MS/MT) before it can register a CMVRN-in of E_{ij}. [This only applies to T_{ee} (as defined under 10.2.1) receiving volume, typically a Capacity Committed CMU who has under-delivered against ALFCO and is receiving volume, ie the under-delivery arises from an Approved Metering Solution (AMS). If the under-delivery arises from the CMU not having an AMS, then the CMU cannot qualify as a CMVR Transferee so cannot offset its under-delivery by acquiring volume from a CMVR Transferor and must instead suffer the pertinent Capacity Penalties] [DQ where is the requirement for a CMVR Registered Participant to have completed MA (and if needed MS/MT) for an AMS in order for E_{ij} volume to be determined and hence be a Transferor?]

5.1.6 These groups who may currently be excluded from Capacity Provider are defined in Rule 1.2 Definitions as follows:

Acceptable Transferee	<p>has the meaning given in Rule 9.2.6, 9.2.7 or 9.2.8 (as applicable)</p> <p>===</p> <p>9.2.6 An Acceptable Transferee in relation to Rule 9.2.4(a), for any Delivery Year, is any of the persons in paragraphs (a) to (d) who meets the conditions in Rule 9.2.6(e)(i) to (xii):</p> <p>(a) a Bidder in a Capacity Auction for that Delivery Year (which may include a Bidder in relation to a CMU which Opted-out under Rule 3.11.2(f)(iii) at the T-4 Auction if, and only if, such CMU has since Prequalified in the T-1 Auction) in relation to a Prequalified CMU that does not have a Capacity Agreement for that Delivery Year;</p> <p style="text-align: center;">[So this Bidder could be a Capacity Provider for a subsequent DY as a result of a previous T-4 Auction]</p> <p>(b) a Capacity Provider in relation to the De-rated Capacity of a Prequalified Prospective CMU that has achieved the Substantial Completion Milestone prior to the Delivery Year in which its Capacity Obligation commences (provided that the transfer relates only to the period prior to such Delivery Year);</p> <p>(c) a Capacity Provider of a CMU that Prequalified for that Delivery Year and that does not have a Capacity Agreement for that Delivery Year equal to the De-rated Capacity of that Prequalified CMU;</p> <p style="text-align: center;">[This would be where an Acceptable Transferee has already taken on a 'transferred part' less than its DRC, so is a Capacity Provider but still has spare capacity]</p> <p>an Eligible Secondary Trading Entrant; [see below]</p> <p>9.2.7 An Acceptable Transferee for the purposes of Rule 9.2.4(b), Rule 9.2.4(c) or Rule 9.2.4(d) may be the same entity as the Capacity Provider transferring its Capacity Obligation to such Acceptable Transferee.</p> <p>9.2.8 An Acceptable Transferee for the purposes of Rule 9.2.4(b), Rule 9.2.4(c) or Rule 9.2.4(d) is a person who has obtained written confirmation from the Delivery Body that it:</p> <p>(a) has provided a Prequalification Certificate and a Certificate of Conduct;</p> <p>(b) has provided the information and made the statements described in Rules 3.4.1 and 3.4.2;</p> <p>(c) is not also a Capacity Provider of a Defaulting CMU in that Delivery Year; and</p> <p>(d) will comply with any requirement to provide or maintain Applicant Credit Cover that may be applicable.</p> <p>(e) the conditions in this Rule 9.2.6(e) are that:</p> <p>(ii)(bb) has delivered a capacity at least equal to its De-rated Capacity in any settlement period falling within the six months prior to the first date in the relevant Delivery Year on which a request was submitted to the Delivery Body under Rule 9.3.1; and</p> <p>(ii)(cc) has provided metering information, completed a Metering Assessment, and where applicable holds a Metering Test Certificate with the CM Settlement Body.</p>
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<p>CMVR Registered Participant</p>	<p>means a person who has been registered under Rule 10.1A.2</p> <p>===</p> <p>10.1A CMVR Registered Participant</p> <p>10.1A.1 A person (“P”) who is an Acceptable Transferee in respect of a CMU within the meaning of Rule 9.2.6, 9.2.7 or 9.2.8 may apply to be registered as a “CMVR Registered Participant” for a Delivery Year or, if it has commenced, so much of the Delivery Year that remains, by giving notice to the Delivery Body:</p> <p>(a) stating that P wishes to participate in volume reallocation under this Chapter;</p> <p>(b) specifying the Delivery Year for which P wishes to be so registered; and</p> <p>(c) specifying the CMU in respect of which the application is made.</p> <p>10.1A.2 If the Delivery Body is satisfied that the application satisfies the conditions in Rule 10.1A.1:</p> <p>(a) P’s registration as a CMVR Registered Participant is to take effect five Working Days after the notice under Rule 10.1A.1 is given to the Delivery Body; and</p>
<p>Eligible Secondary Trading Entrant</p>	<p>means a Secondary Trading Entrant which has Prequalified in accordance with Rule 4.9</p> <p>===</p> <p>3.13 Application process for Secondary Trading Entrants</p> <p>3.13.1 A Secondary Trading Entrant may submit an Application at any time from the Auction Results Day for the relevant T-1 Auction up to the end of the relevant Delivery Year, other than during the Prequalification Assessment Window for any Capacity Auction.</p> <p>3.13.2 An Application submitted in accordance with Rule 3.13.1 must comply with Chapter 3, except to the extent that this Chapter 3 requires the submission of the Application during the Prequalification Window.</p> <p>4.9 Notification of Prequalification decision to Secondary Trading Entrants</p> <p>4.9.1 Upon receiving an Application for a CMU from a Secondary Trading Entrant pursuant to Rule 3.13.1, the Delivery Body must notify the Secondary Trading Entrant within three months:</p> <p>(a) of the Prequalification Decision for the CMU; and</p> <p>(b) where the Prequalification Decision for the CMU is that the CMU has Prequalified, that the Secondary Trading Entrant is an Eligible Secondary Trading Entrant for the purposes of Rule 9.2.6(d).</p>
<p>Secondary Trading Entrant</p>	<p>means the Applicant for:</p> <p>(a) an Existing Generating CMU comprising biomass plant which is exiting the Low Carbon Exclusion(s) in which it participates;</p> <p>(aa) an Existing Interconnector CMU; or</p> <p>(b) a Proven DSR CMU; or</p> <p>(c) an Existing CMU which is not an Excluded CMU,</p> <p>wishing to acquire a Capacity Obligation through secondary trading</p>

- 5.1.7 An Acceptable Transferee, including an Eligible Secondary Trading Entrant, is required to complete MA and if necessary MS.
- 5.1.8 A CMVR Transferor who is a CMVR Registered Participant does not appear to be required to have completed a MA and if necessary a MS
- 5.1.9 However, neither of those groups are covered by the term Capacity Provider in Schedule 6 below, so should a Surgery Item seek to clarify the wording in Sch 6.

5.2 Rules Schedule 6 itself is limited to ‘Capacity Provider’

SCHEDULE 6: METERING STATEMENT

A Capacity Provider must provide a detailed description for each CMU, Generating Unit or DSR CMU Component which must include, as applicable, the following information:

:

- 5.2.1 The term ‘Capacity Provider’ is also repeated in each of sections (d), (e), (f), (g), (h), (i), (j), (k), (l), (m) x2, (n) x4, (o), (p), (q) and (r).
- 5.2.2 Even though other Rules may require submission of a Metering Statement, this makes the need to complete Sch 6 confusing.

5.3 Schedule 6 implementation by EMRS

5.3.1 Meanwhile, since the implementation of CP373 and the move of responsibility for Metering to CMSB:

- a) CM Metering in EMRS Guidance document G1
- b) Metering Assessments are now managed via the ‘My EMRS Portal’, see EMRS Guidance document G25 v8.0 pages 22-23; and
- c) Metering Statements required as part of Metering Tests are covered in EMRS Guidance and Working Practice documents:
 - i G20 v12 Metering Statement
 - ii WP197 v11 on Metering Tests, pages 10-12 and Appendix 4 (which replicates Schedule 6); and
 - iii WP196 v8 on Technical Assurance (Site Audits), pages 9-11.

5.3.2 G20 highlights at section 3 that Metering Statements should be completed per metered circuit, ie typically a site. This might mean one or more GU on a site and not necessarily per CMU (which could include GUs from multiple sites/circuits).

5.3.3 Should a Surgery Item be raised to consider applying some changes to Sch6 that highlights how the requirements for Sch6 may mean multiple Sch6s being submitted?

5.3.4 In WP197 EMRS sets out which parts of Sch 6 are required for different types of Metering Configuration Solution (MCS):

- a) Table 4 – BCS MCS (ie Rules 1.2 Definition ‘Supplier Settlement’ MCS)
- b) Table 5 – Bespoke MCS
- c) Table 6 – Balancing Services MCS

5.3.5 Those Tables 4-6 can be reworked by Sch 6 as follows:

Sch 6	Always	Table 4 BCS	Table 5 Bespoke	Table 6 BS
(a) Single Line Diagram (SLD)	Y Note1			
(b) Metering Site details	Y			
(c) Metering Technical		Y	Y	N
(d) Non-1/2 hr		N	N	Y
(e) Data Provision	Y			

Sch 6	Always	Table 4 BCS	Table 5 Bespoke	Table 6 BS
(f) Time synch	Y			
(g) Security	Y			
(h) Testing Facilities		Y	Y	Only FCDM
(i) Installation data	Y			
(j) Instrument Transformers	Y			
(k) Power Transformers		If Dispensation	N	N
(l) Meters	Y			
(m) Instrument Transformer Burdens	Y			
(n) Commissioning Requirements	Y			
(o) Transformer Loss Compensation		If Dispensation	If compensated	N
(p) Cable & O/head Loss Compensation		If Dispensation	N	N
(q) Electrical Losses Factor		Private Network	N	N
(r) Declaration	Y			

Note 1 This appears inconsistent with G20 section 3.1 which states that SLD is only required for Bespoke or Balancing Services metering (ie not BSC, aka Supplier Settlement, metering)

5.3.6 Should a Surgery Item be raised to consider applying some changes to Sch6, reflecting the above EMRS views on when elements are required per Tables 4-6 in WP197?

5.3.7 Although Sch 6 was subject to minor amendments in Rules 2024 these have not all been reflected in WP197 Appendix 4 (and WP196 Appendix 6). Meanwhile that Appendix 4 includes some changes that do not reflect Rules 2024:

a) Rules 2024 changes to Sch 6 not in Annex 4

(b)(vi) deleted 'and'

(b)(viii) inserted 'and'

(e)(iii) inserted 'Rule' before '14.2.7'

(n)(ii) removed 'or'

(n)(iv)(d) added ')' before ';

b) In Annex 4 not in Rules 2024 Sch 6

(c)(i) uses abbreviations for MPAN, MSID and BMU

(c)(vii) called (viii) so (vii) missed and (viii) to (xii) called (ix) to (xiii)

(d) has inserted an alternative heading

(d)(ii) has inserted an additional exclusion 'or satisfy the requirement of (l) (ii)'

(d)(iv) has omitted 'Settlement' before 'Instation'

(d)(v) has replaced 'the CM Settlement Body' with 'EMRS'

(e) has replaced 'A Capacity Provider' with 'Capacity Providers'

(e)(i) has replaced 'the CM Settlement Body' with 'EMRS'

(e)(ii) has twice inserted 'Central Data Collection Agency (CDCA), ' before 'Half Hourly Data Aggregators (HHDA)' and in the second occurrence used abbreviations

(e)(ii) has replaced 'CM Settlement Body' with 'Metering Agent'

(i) has replaced 'CM Settlement Body' with 'Metering Agent'

(l) has replaced 'A Capacity Provider' with 'Capacity Providers'

(l)(iii) inserted after 'third party' the following '(be produced using standards verified by the National Physical Laboratory (NPL), or a calibration laboratory that has been accredited by the United Kingdom Accreditation Service (UKAS), or a similarly accredited international body and include an overall accuracy and uncertainty of measurement statement for the relevant calibration equipment, where uncertainty is determined in accordance with the current UKAS Directive M3003)'

After (l)(iv) replaced ', 2, 3 and 4' with '(Class 0.2s), 2 (Class 0.5s), 3 (Class 1) and 4 (Class 2)'

(l) table Notes **** excludes 'and Class 2 (Type 4) Meter'

(m) has replaced 'A Capacity Provider' with 'Capacity Providers'

(n) has replaced 'A Capacity Provider' with 'Capacity Providers'

(n)(i) added 'or' (and (ii) retained 'or')

(n)(iii) has replaced 'CM Settlement Body' with 'Metering Agent'

(n)(iii) omits 'or'

(q) replaced 'A Capacity Provider using the Balancing Services Metering Configuration Solution or the Bespoke Metering Configuration Solution' with 'Only applicable to the Unlicensed Network a CMU is operating on if the site the CMU is part of is a Third Party Access site; a Capacity Provider operating'

5.3.8 Should a Surgery Item be raised to consider applying some changes to Sch6, as made by EMRS in Appendix 4 to WP197?

5.3.9 Should EMRS implement changes to WP197 Appendix 4, to reflect Rules 2024, with any agreed proposals for change to Sch6 from the above Surgery Item.

6. Potential Surgery Items related to Reconfiguration of a CMU [CMAG26 slide 45]

6.1 Background

6.1.1 Currently Regs and Rules impose controls over what CMU attributes can and cannot be changed

Granularity	Data item	Reg31 (2)(a-i)/(3)	Rules 7.4.1/5	7.5.1 (CMR change)	Other [wip]	
CMU	description	FIXED	(a)(ic/id)/(ii)			
	location		(a)(iii)			
	Ex/P, NB/uP, Refurb		(d)(ii/iv)			
	GTC		(a)(ic)/(ii)			
	PFT		(a)(ic)/(ii)	(ra) [no why/when/ref]	8.3.4A	
	Storage Facility		(d)(xii)			
	TC/DC, CMRS, IC, DRS		(d)(i)			
	CC/DSRC		(a)(ic)/(d)(v)	(j) DSRT Proven DSRC		
	DRC		(a)(ic)/(d)(ix)	[Generating CMU \sum_l DRC _k]		
	Agreement	duration	FIXED	7.4.5(e)	(f) 6.8.4(a) Pre-Ref 1DY (h) 6.10.4(c) to CFD (i) early Termination (n)/(ee) 8.3.6(b) TPS reduction (na) 8.3.6D(f) TPS RN (ff) 8.3.6D(d-f) TPS RN	
DYs		FIXED	7.4.5(e)	(dd) [ie from duration change]		
AACO		FIXED	7.4.5(f)	(d) 6.7.4(b) SCM (e) 6.7.6/A Inc OC (f) 6.8.4(b) Pre-Ref DRC (g) 6.8.5 MCR (m) 8.3.2(c) DSRT (v) 13A.8.8 DSRT		
CCP		FIXED	7.4.5(g)			
Base Period		FIXED	7.4.5(h)			
APC/MPC (F/G)		FIXED	7.4.5(o)			
TFn rates		FIXED	7.4.5(m)			
Prospective CMU		FCM	FIXED	7.4.5(j)(i) Met (d)(xviii)		
		GCA/DCA/PNL		7.4.5(j)(ii)/(k)		
		MCR & LSD	FIXED	7.4.5(j)(iii)		
	SCM		7.4.5(j)(iv)			

Granularity	Data item	Reg31 (2)(a-i)/(3)	Rules 7.4.1/5	7.5.1 (CMR change)	Other [wip]
GU/Component	description		(a)(ic/id)		4.4.4 Fixed Config
	location			(r) NB/DSR change of location since Application	
	GTC		(a)(ic)	(ra) [no why/when/ref]	
	PBA				4.4.4A
	PFT		(a)(ic)	(ra) [no why/when/ref]	
	CC/DSRC		(a)(ic)	(gg) 4.7.3 Planning [<Auction]	
	DRC		(a)(ic)/(d)(ix)	(gg) 4.7.3 Planning [<Auction]	
Permitted on-site Generator in DSR	Generating Capacity & PFT		(a)(id)	(hh) [no why/when/ref]	

Note that many of the above attributes can be amended following 7.5.1(t) ofgem 'enforcement decision' or 7.5.1(u) Reg 73(2)(a) CMR amended for 73(1)(a) DB redetermination or 73(1)(b) ofgem/court decision.

6.1.2 In the initial CMU attributes in the CMR from Rule 7.4.1 we see the following queries:

- a) Requirement for DRC per CMU and GU appears duplicated between (a)(ic) and (d)(ix). [DQ make 7.4.1(d)(ix) 'Omitted'?] If so, add to Housekeeping changes.
- b) Flagging if a CMU comprises a Storage Facility under 7.4.1(d)(xii) appears to duplicate the GTC by GU/Component required by 7.4.1(a)(ic). [DQ make 7.4.1(d)(xii) 'Omitted'?] If so, add to Housekeeping changes.
- c) Note also that 7.4.1(d)(xvi) PQ conditional on complying with 3.4.10(b) [FFED, introduced by R(A)5 2019] when that Rule 3.4.10 is now Omitted. [DQ make 7.4.1(d)(xvi) 'Omitted'?] If so, add to Housekeeping changes.

6.1.3 Note that 7.5.1(ee) relates to 8.3.6(b) and (c), although (c) is now 'omitted'. As a consequence 7.5.1(ee) is now effectively a duplication of 7.5.1(n). Added to Housekeeping changes.

6.1.4 Note that 7.5.1(ff) relates to 8.3.6D(d-f), ie adding (d-e) compared to 7.5.1(na), where (d-e) relate to appeal to SoS by CP subject to a Reduction Notice and SoS decision (see Reg 33A). As a consequence 7.5.1(na) is now effectively duplicated by 7.5.1(ff). Added to Housekeeping changes.

6.1.5 [Subject to wip on clarifying other changes to configuration that are allowed under the Rules (see last column in the table above)] Key attributes of a CMU appear to be changeable with the following queries:

- a) Although a CMUs Capacity Obligation (AACO) may change as a result of demonstrated reduced Output (or subsequent increase within deadlines), this is not identified to any corresponding limitations in physical Connection Capacity or physical generating capacity (the limitation in Output could be as a result of either). [DN see CMAG Briefing on 3.5 Connection Capacity. DQ Should CC/DRC be subject to change, eg for phased connections, reduced TEC/MEC and subject reinstatement, etc?]
- b) 7.5.1(ra) allows for changes in the CMR for GTC and PFT, at both GU and Generating CMU granularities. A change in PFT (ie refuelling within the same GTC) could be allowable after a CMU obtains a Capacity Agreement at Auction. However, because GTC drives DF% and hence DRC then surely a change in GTC cannot be allowed after an Auction? [DQ should (ra) be clarified that GTC can only be changed between PQ and Auction?]

6.2 Rule 7.4.1(d)(i) TC v DC, CMRS v Non-CMRS, potential for change

7.4.1(d)(i) whether the CMU is a Transmission CMU, a CMRS Distribution CMU, a Non-CMRS Distribution CMU, an Interconnector CMU or a DSR CMU;

6.2.1 Over the lifetime of a CMU from first Application to last Agreement there is every prospect the CMU may want to change from DC to TC or DC Non-CMRS to CMRS. This does not appear to be specifically prohibited by Rules but could potentially be interpreted as such under Reg 31(2)(a) CMU 'description'.

6.2.2 If it is agreed a CMU can change its connectivity then Rules do indicate that all GU within a Generating CMU must be of the same type, eg:

a) CMRS Distribution CMU is defined as 'each GU' of a CMU where the Metering System for the BMU is registered in CMRS according to BSC;

b) Non-CMRS Distribution CMU is defined as 'each GU' of a CMU that is not a CMRS Distribution CMU;

c) Distribution CMU is defined as above CMRS/Non-CMRS Distribution CMU, so inherits the 'each GU' of a CMU

6.2.3 Rule 3.4.5(a) requires each Application to include a 'statement as to Capacity', be that the Connection Capacity (CC) or DSR Capacity (DSRC) of the CMU, and in addition for Generating CMUs the CC per GU and, for Generating or Interconnector CMUs the basis under 3.5 by which the CC has been determined. [\[DN see Note H below\]](#)

6.2.4 Rules Chapter 3 sets out what information must be provided at Application during a Prequalification Window for each connection type (3.1.2(a) TC, DC CMRS, DC Non-CMRS, Interconnector or DSR).

CMU Type	TC	DC	T-4 Deferred*	PN
Existing Interconnector	3.5A.1 3.6A.2(b) GCAs/CMU [A]			
New Build Interconnector	3.7.3(aa)(ii) GCAs/CMU [A]			
Existing Generator	3.6.3(a)(ii) GCA/GU [B]	3.6.3(c)(ii) DCA/GU [C]		3.6.3(d) PN letter/CMU [D]
New Build Generator	3.7.3(a)(ii) GCA/GU [E]	3.7.3(b)(ii) DCA or offer/GU [F]	3.7.3(c) Declare DCA or PN letter in place 18m<DY1 [G]/[H]	3.7.3(ba) PN letter/CMU [D]
Site controls at Application	3.5.1A	3.5.1A	3.5.1A	
Connectivity Termination	6.10.1 (g)TEC<DRC (ga)TEC<CO	n/a	6.10.1(e) Fail 18m deadline	n/a

* A New Build Generator that has deferred DCA/PN is not an Acceptable Transferee for Secondary Trading until the DCA or PN letter has been provided to DB.

Notes concerning capacity:

- A) 3.6A.2(a)/3.7.3(aa)(i) TEC \geq Anticipated DRC [DQ Why 'anticipated' when GCA is required at Application?] {DQ why not \geq CC, see CMAG Briefing on 6.10.1(g)/(ga)?}
- B) 3.6.3(a)(i) TEC \geq DRC (ie consistent with 6.10.1(g)), {DQ why not \geq CC, see CMAG Briefing on 6.10.1(g)/(ga)?}
- C) 3.6.3(c)(i) RC \geq DRC, {DQ why not \geq CC, see CMAG Briefing on 6.10.1(g)/(ga)?}
- D) Existing PN CMU can, under 3.5.3/4, use Average Output, but 3.6.3(d)(i) uses 'the full output that CMU is able to Export onto that Private Network' without any reference to the CC or DRC.
- E) 3.7.3(a)(i) TEC \geq Anticipated DRC, [DQ Why 'anticipated' when GCA is required at Application?] {DQ why not \geq CC, see CMAG Briefing on 6.10.1(g)/(ga)?} [DN As with concerns over 3.5.1A, TEC is at Power Station (PS) level, not necessarily CMU or multiple CMUs (ie some GU within a PS may not be in any CMU) and TEC is contracted for each financial year Apr-Mar.]
- F) 3.7.3(b)(i) RC \geq Anticipated DRC, {DQ why not \geq CC, see CMAG Briefing on 6.10.1(g)/(ga)?}
- G) A deferred DCA New Build Generating CMU under 3.7.3(c) will set its Connection Capacity at Application under 3.5.2(c) Good Faith Estimate
- H) However, a deferred PN New Build Generating CMU under 3.7.3(c) does not appear to have any basis for establishing its Connection Capacity at Application, because 3.5.2(c) is specific to DC CMUs. [DQ Should 3.5.2 be amended to provide for GFE of deferred PN evidence?] [DQ Should any such Connection related issues be addressed via this CP373 'audit' or via the 3.5 Connection Capacity review Briefing?]
- 6.2.5 Under the Rules, a Prospective CMU can achieve Operational capacity * DF% of at least 90% of AACO for SCM (6.7.2) or >50% for MCR (6.8.2-3). However, if Operational Capacity *DF% is <100% of AACO, any such reduction could be as a result of limited generation or by a lower Connection Capacity than used at Application.
- 6.2.6 Under 6.7.4(b) any Capacity Agreement effective at <100% AACO 'will take effect with respect to that proportion of the De-rated Capacity which is operational only'. Consequently 7.5.1(d) will see the Capacity Obligation (AACO) reduced in the CMR.
- 6.2.7 Any such lower Operational capacity can subsequently be increased back towards 100% of AACO under Rule 6.7.6/A and then by 7.5.1(e) recognise in the CMR any such change in Operational capacity, ie the AACO. Any such increase might be as a result of increased generating capacity or increased Connection Capacity.
- 6.2.8 If the AACO in the CMR is varied according to 7.5.1(d/e), as above, there is no requirement for the related CC or DRC to be amended, because the reason for the change in AACO may not be related to CC (and hence to DRC) but to the physical operating capabilities of the GU plant.
- 6.2.9 There appears to be no other provisions within 7.5 for the CC of GU and the aggregate CC of a CMU to be varied, even if that is the basis for a reduced, or subsequently increased, Operational capacity.
- 6.2.10 There is no provision under CM for an increase in Operational capacity beyond 100% of AACO (eg to take on PTCO-in), by increased Connection Capacity and increased generating capacity. Instead, a CMU would have to be cloned with such increase into a later Auction. As there is no option for 'voluntary' termination of an existing Agreement, this prevents increased Operational capacity of a CMU, within the term of a multi-year Agreement, being recognised within the CM.
- 6.2.11 Meanwhile, there are no specific Rules about recognising the practicality of a CMU's connectivity changing:
- from PN to DCA/GCA; or
 - DCA to GCA; or
 - DC Non-CMRS to DC CMRS.
- 6.2.12 if such CMU attributes could change, they cannot change the CMU's recognised DRC after it becomes Operational (up until then a Prospective CMU's CC/DRC or physical capacity can reduce, as long as it achieves MCR, >50% of the original at Application).

6.3 Rule 8.3.4A GU PFT change

8.3.4A Primary Fuel Type

A Capacity Provider must notify the Delivery Body of a change in the Primary Fuel Type for a Generating CMU.

- 6.3.1 This Rule was introduced by R(A)2016 but only applies to Auctions from 1/9/17. However, in R(A)2016 it is included under Part 4 'Obligation Trading and volume reallocation', although this Part 4 also introduced in 1.2 Definitions 'Primary Fuel Type' (PFT) and 3.4.5A PFT of a Generating CMU at Application as well as inserted into 7.4.1(a)(ii) PFT of a Generating CMU and added 7.5.1(ra) change in PFT of a Generating CMU, ie from 8.3.4A.
- 6.3.2 In ofgem's response (decision) to its 29/4/16 consultation on 70 CPs, it rejected several CPs relating to 'fuel type' because of DECC's decision to add Primary Fuel Type. This included rejecting CP106 by Alkane that fuel type be changeable.
- 6.3.3 The above rejection of CPs was based on DECC's response to their Dec-2015 Consultation which included:
- a) Q26 expanding the CMR, where stakeholder responses at 1.116 included 'fuel type'; and
 - b) at 1.120 a decision taken since the consultation to include 'fuel type' in the CMR.
- 6.3.4 There was no further reference to 'fuel type' in DECC's response to their Mar-2016 Consultation.
- 6.3.5 So it has to be concluded that the decision to insert 8.3.4A, allowing PFT to change, was a Policy decision. This is consistent with the more recent strategy to allow re-fuelling as part of decarbonisation, eg moving to Hydrogen.
- 6.3.6 In R(A)5 2019 Part 5 Fossil Fuel Emissions Declaration (FFED) was introduced, before related Rules were amended in R(A)2 2020 Part 4 (which included adding ERMC), R(A)2021 Part 4 (which included amending EMRC(b) to 'adding or removing at least one fuel') and R(A)2024 Part 3.
- 6.3.7 If a GU comprises a Fossil Fuel Component, should a change of PFT be recognised as a change in fuel under Emissions Related Material Change [ERMC] (b) and thus cross referenced to the need for an updated FFED under 8.3.13?
- 6.3.8 Note that the reverse, an ERMC change in fuel, may not mean a change in PFT for the GU or the CMU if the removed fuel is not the PFT, eg a GU using a blend of fuels.

7. Potential Surgery Items related to format and content of the CMMR [CMAG26 slide 35]

7.1 Background

7.1.1 See Appendix on CMMR

7.1.2 The format of the CMMR included within the Rules 2024 is based on existing and previous Rules for the CMR.

7.2 Rule 7.4A.1 CMMR by Auction (like CMR)

7.4A.1 With respect to each Capacity Auction, the CM Settlement Body must ensure that the following entries are made on the Capacity Market Metering Register from Prequalification Results Day

7.2.1 The CMMR follows the CMR principle of being based on each Auction, even though Approved Metering Solution (AMS) for a CMU may persist through multiple Auctions, or be subject to change during an Agreement arising from an Auction.

7.3 Rule 7.5 re CMSB amendments to the CMMR and 7.5.1(u) and 7.7.4

7.5 Delivery Body amendments to the Capacity Market Register

:

7.5.1(u) where the Delivery Body is required by Regulation 73 to amend the Capacity Market Register to give effect to:

- (i) a decision of the Authority or the court on review or appeal under the Rules or the Regulations; or
- (ii) a redetermination by the Delivery Body pursuant to a direction by the Authority or the court, within five Working Days of receipt of the decision or instruction amend the Capacity Market Register as required by that decision or instruction;

:

7.7.4 A person who receives a notice under Rule 7.7.3 may dispute the decision and request that the Delivery Body reconsider its decisions to refuse the request for rectification of the Capacity Market Register in accordance with Regulation 69.

7.3.1 A first draft of section 7.7A in the CP373 review of Rules 2023, as below:

7.7A Application for rectification of the Capacity Market Metering Register and Appeals

7.7A.1 Where any person considers that an entry maintained in respect of it or any CMU for which they are the Capacity Provider under this Chapter 7 is factually inaccurate, they may request to the CM Settlement Body that the entry be amended or deleted.

[Notes in CP373 review of Rules 2023: Any such request must—

1. set out the reasons why the Capacity Provider believes that the entry is factually inaccurate together with such supporting information as may be relevant; and [included in Rules 2024]
2. be given not later than 28 days after the entry has been made to the Capacity Market Metering Register.] [DQ not included in Rules 2024?]

[The CM Settlement Body may, to assist in determining whether the entry is factually inaccurate, appoint an independent person to consider the matter.] [see 7.7A.7 in Rules 2024]

7.7A.2 If the CM Settlement Body accepts a request received under Rule 7.7A.1 the CM Settlement Body must within five Working Days of receiving the request:

- (a) rectify the relevant entry in the Capacity Market Metering Register as set out in the request; and
- (b) notify the person who made the request for rectification of the Capacity Market Metering Register that it has been rectified.

- 7.7A.3 If the CM Settlement Body refuses a request for rectification received under Rule 7.7A.1, the CM Settlement Body must within five Working Days notify the person who made the request that the CM Settlement Body has refused the request and shall provide reasons for that decision.

[DQ o/s CMSB Disputes process where not related to Regs Parts 6-7] [see 7.7A.4-7 in Rules 2024]

7.3.2 The final version for R(A)2024 is then as follows:

7.7A Application for rectification of the Capacity Market Metering Register and Appeals

- 7.7A.1 Where any person consider that an entry maintained in respect of it or any CMU for which they are the Capacity Provider under this Chapter 7 is factually inaccurate, they may request to the CM Settlement Body that the entry be amended or deleted.

Any such request must set out the reasons why the Capacity Provider believes that the entry is factually inaccurate together with such supporting information as may be relevant; and

- 7.7A.2 If the CM Settlement Body accepts a request received under Rule 7.7A.1 the CM Settlement Body must within five Working Days of receiving the request:
- (a) rectify the relevant entry in the Capacity Market Metering Register as set out in the request; and
 - (b) notify the person who made the request for rectification of the Capacity Market Meter Register that it has been rectified.
- 7.7A.3 If the CM Settlement Body refuses a request for rectification received under Rule 7.7A.1, the CM Settlement Body must within five Working Days notify the person who made the request that the CM Settlement Body has refused the request and shall provide reasons for that decision.
- 7.7A.4 If the Capacity Provider disagrees with the decision of the CM Settlement Body pursuant to Rule 7.7A.3, they may submit a further request to the CM Settlement Body within 5 Working Days to have them reconsider the decision, stating why they do not agree with the decision.
- 7.7A.5 If the CM Settlement Body accepts a request received under Rule 7.7A.4, the CM Settlement Body must within five Working Days of receiving the request:
- (a) rectify the relevant entry in the Capacity Market Metering Register as set out in the request; and
 - (b) notify the person who made the request for rectification of the Capacity Market Metering Register that it has been rectified.
- 7.7A.6 If the CM Settlement Body refuses a request for rectification received under Rule 7.7A.4, the CM Settlement Body must within five Working Days notify the person who made the request that the CM Settlement Body has refused the request and shall provide reasons for that decision.
- 7.7A.7 If the Capacity Provider does not accept a decision of the CM Settlement Body pursuant to Rule 7.7A.6, they may submit the dispute to an expert for determination in accordance with the Expert Determination Procedure [EDP] and, following the determination by the expert in accordance with the Expert Determination Procedure, within 5 working days the CM Settlement Body will either
- (a) rectify the Capacity Market Metering Register and notify the person who made the request for rectification of the Capacity Market Metering Register that it has been rectified; or
 - (b) refuse the request for rectification

[EDP defined as s1 of Sch 5 Expert Determination Procedure, where 1.1 and 2.1A inserted referring to Rule 7.7A.]

- 7.3.3 For CMR there is only a deadline, under 7.7.1A, for an Applicant seeking a correction to an entry in the CMR up to 10WD prior to the first bidding round of the relevant auction. Subsequent to the auction there is no deadline for such a request under 7.7.1.

7.3.4 For CMMR there was originally a proposal (see [note 2](#) under 7.7A.1) that a deadline of 28 calendar days be set for such a request to amend the CMMR, but this was not included in the final Rules 2024. Concerns were raised in the original comments to the proposal that, because there is no provision for recalculation of the System Stress Event related settlement calculations, a deadline should be related to the length of the window during which Capacity Volume Registers (CVR) are produced before the final under/over-delivery calculations.

7.3.5 The options appear to be:

- a) Do not impose any deadline (as with CMR post-auction), so in 7.7A.1 simply undertake a Housekeeping change by replacing '**and**' with '**.**'; or
- b) Only impose a deadline if a System Stress Event (SSE) has been declared under Rule 8.4.5, with a deadline of 5WD after the first CVR under Rule 10.5.1 (thus still allowing CMSB 5WD to respond under 7.7A.2 before the final CVR on WD19 after the SSE month end), this can be achieved by insert at the end of 7.7A.1 '**if a System Stress Event has been declared under Rule 8.4.5, be given not later than 5 working days after publication of the first Capacity Volume Register under Rule 10.5.1.**'; or
- c) Impose a consistent deadline (irrespective of the small risk of a SSE) of <x> WD, by insert at the end of 7.7A.1 '**be given not later than <x> working days after the entry has been made to the Capacity Market Metering Register.**'.

8. Potential Surgery Items related to Data Retention [CMAG26 slide 52]

8.1 Background

8.1.1 Existing Rule 7.2.5 relates to data retention for information in the Capacity Market Register (CMR).

7.2.5 The Delivery Body shall retain all data submitted to or stored on the Capacity Market Register (but not the Capacity Market Register itself) for a period of:

- (a) 5 years from the date on which it is received by the Delivery Body, in the case of data referred to in Rule 7.4.1 to Rule 7.4.4; and
- (b) 5 years from the date of the expiry or earlier termination of the Capacity Agreement, in the case of data referred to in Rule 7.4.5.

8.1.2 Existing Rule 3.14 considers retention of all Applications or Opt-out Notifications (along with related data) for a period of 10 years from the 'relevant DY'. [DQ does this mean the DY in which they were submitted or the 'target DY' for the pertinent Auction?] If there is an ongoing Dispute or Appeal then the data must continue to be retained until that is resolved.

3.14 Retention of Applications and Opt-out Notifications by the Delivery Body

3.14.1 Subject to Rule 3.14.2, the Delivery Body must retain all Applications and Opt-out Notifications (including the Additional Information and any evidence submitted with the Application or Opt-out Notification) for a period of ten years from the end of the relevant Delivery Year.

3.14.2 The Delivery Body must retain all Applications which as at the end of the period referred to in Rule 3.14.1 are the subject of a review or appeal brought in accordance with the Rules or the Regulations until such review or appeal has been determined and no further review or appeal may be brought.

8.1.3 Existing Regs related to data retention

- a) 47(6) CMSB to retain Non-Payment Register data for 5 years

8.2 Rule 7.2A.5 CMMR Data Retention

7.2A.5 The CM Settlement Body shall retain all data submitted to or stored on the Capacity Market Metering Register for a period of:

- (a) 5 years from the date on which the content was received by the CM Settlement Body, in the case of data referred to in Rule 7.4A; and
- (b) 5 years from the date of the expiry or earlier termination of the Capacity Agreement, in the case of data referred to in Rule 7.4A.

8.2.1 So CP373 has copied 7.2.5 for CMR as 7.2A.5 for CMMR yet:

- a) 7.4A.1(a) relates to reference data from the CMR; and
- b) 7.4A.1(b) relates to metering, MA and MT, which can relate to a CMU's physical asset over the course of multiple Capacity Agreements, be that as a single CMU ID or multiple cloned CMU IDs.
- c) The CMMR will relate to SPD/EPT that can give rise to Suspension of Capacity Payments or Termination of Capacity Agreements and the standard data retention policy for the related financial records for [tax](#) purposes would be 6 years after the end of the last financial year (aka 6+1).

8.2.2 Should 7.2A.5 be restructured to better align with the CMMR, eg 6yrs from the end of the last Capacity Agreement or part thereof? Note that:

- a) this is for 6 years rather than 5, to align with accounting record requirements;
- b) for a single DY T-1 Agreement this would be less than the 10yrs under 3.14.1;
- c) for a multi-year T-4 Agreement this would be 4yrs Application before first DY, 15 DYs and 6yrs after the March following the last DY

8.3 Other data retention

8.3.1 The above only relates to retention of Applications & Opt-outs (3.14), CMR (7.2.5) and CMMR (7.2A.5) data.

- 8.3.2 The information held by any of the Administrative Parties (DESNZ, ofgem, NESO & EMR DB, CMSB & EMRS), that supports decisions made in accordance with the Regs & Rules and allows EMRS settlement of the CM, is a much wider set of information for which no data retention is currently specified in the Rules.
- 8.3.3 This additional information, held by all Administrative Parties, should include at least that required for:
- a) Application related information beyond Rule 3.14 Applications and Opt-outs, eg Planning Consents, Price-Maker information, Bidding Capacity, deferred Connection Agreements, etc;
 - b) Auction data and related audit;
 - c) Conditional PQ Credit Cover;
 - d) Meeting Milestones such as FCM, MCR, SCM, extending LSD;
 - e) Transfers and Secondary Trading;
 - f) Delivery Assurance by Metering Tests, Site Audits, progress reports, remedial plans, Operational physical capacity, Total Project Spend (TPS), Extended Years Criteria (EYC), DSR Tests, SPDs, EPTs, Emissions Declarations, etc;
 - g) Notices, appeals, decisions, Non-completion and Terminations including related fees;
 - h) Stress Event related, including Balancing Services and Volume Reallocation; and
 - i) Settlement Data for Capacity Payments, Offsetting & Recovery, Capacity Penalties & Over-delivery Payments.
- 8.3.4 Any data retention could be based on the same Capacity Agreement last DY +7years as proposed above.
- 8.3.5 Given that the above data comes from a variety of sources, as detailed in Rule 14, it appears appropriate to add a pertinent data retention provision in Rule 14.7.
- 8.3.6 A potential solution could be:

14.7 General data retention

- 14.7.1 Subject to Rules 3.14, 7.2.5 and 7.2A.5, all the above information in Rules 14.1 to 14.6 used by the CM Settlement Body, as well as pertinent information provided to the other Administrative Parties, all in pursuit of effective operation of the Capacity Market, shall be retained for:
- (a) five years from the date on which it is received, in the case of data which does not relate to a Capacity Agreement; or
 - (b) seven years from the end of the Delivery Year in which the relevant Capacity Agreement expires or is terminated, in the case of data which does relate to any Capacity Agreement or impacts the settlement of any Capacity Agreement.

9. Potential Surgery Items related to DSR Alternative Delivery Periods [CMAG26 slide 53]

9.1 Background

9.1.1 The Rules currently contain a provision for DSR CMUs to use DSR Alternative Delivery Periods (ADP).

1.2 Definitions

DSR Alternative Delivery Period	means a continuous period of 30 minutes [DQ this is not defined as aligning to the BSC ½ hr Settlement Period, so could in theory be minutes 16-45 of an hour]
DSR Volume	means the excess (if positive) of: (a) the sum of the Baseline Demand of each DSR CMU Component comprised in the DSR CMU in that Settlement Period, over (b) the sum of the Metered Volume (positive or negative) of each DSR CMU Component comprised in the DSR CMU in that Settlement Period, expressed in MWh to three decimal places and, for these purposes, a net imported Metered Volume is positive and a net exported Metered Volume is negative

13.2.6A For the purposes of Rule 13.2.6(a): [DQ so does NOT apply to 13.2.6(b) subsequent DSR Test]

(a) a DSR Alternative Delivery Period may be identified by a CMU only where:

- (i) that CMU is metered using a higher time sampling frequency than half-hourly;
- (ii) the metered data is available to the Applicant or Capacity Provider; and

[DN (a) and (i)/(ii) above replicate Schedule 2 1.2, but (iii) and (b) below are additional.]

- (iii) the metered data is made available to the Delivery Body in a format specified by the Delivery Body; and [DQ responsibility for managing metered data now lies with CMSB, even if DB may subsequently need the data to validate SPD/EPT]

(b) the calculation of DSR Volume [Rules 1.2 Definition] may, where applicable, be made by substituting Settlement Period with DSR Alternative Delivery Period where that term is specified under Rule 1.2

13.2B.6A [same as 13.2.6(a) but for 13.2B.6(a) Joint DSR Test] [DQ as 13.2.6A, 13.2B.6A does NOT apply to 13.2B.6(b) subsequent Joint DSR Test]

SCHEDULE 2: BASELINE METHODOLOGY

1.2 The baseline Demand will be determined for each Settlement Period or DSR Alternative Delivery Period based on the relevant data points for that period. For the purposes of this methodology a DSR Alternative Delivery Period may be identified by a CMU only where:

1.2.1 that CMU is metered using a higher time sampling frequency than half-hourly; and

1.2.2 the metered data is available both to the Applicant or Capacity Provider and to the Delivery Body.

9.1.2 DSR Volume, potentially using ADP, is then referenced in:

1.2 Definitions = Baseline Demand – Metered Volume of the DSR CMU

8.3.4(c) removed Components not included in DSR Volume from the 5th WD after notice

8.3.4(g) added Components included in DSR Volume from the 21st WD after notice

[DQ 8.5 Discharging a Capacity Obligation only refers to SP and does not provide for ADP]

8.6.3 delivered capacity (output) of a DSR CMU = DSR Volume [DQ 8.6 only refers to SP not ADP, implying that an ADP must be aligned to a SP]

13.2.6(a) DR Test for Prequalification, historic information (for 3SP or 3ADP) for Proven DSR CMU
[DQ 13.2.6(b) subsequent DSR Test only refers to SP, implying that an ADP must be aligned to a SP]

13.2.6A (as above)

13.2B.6(a) Joint DSR Test as 13.2.6(a) above) [DQ 13.2.6(b) subsequent Joint DSR Test only refers to SP, implying that an ADP must be aligned to a SP]

Schedule 2 Baseline Methodology

9.2 Rule 13.2.6A DSR Alternative Delivery Period

13.2.6A For the purposes of Rule 13.2.6(a):

- (a) a DSR Alternative Delivery Period may be identified by a CMU only where:
 - (i) that CMU is metered using a higher time sampling frequency than half-hourly;
 - (ii) the metered data is available to the Applicant or Capacity Provider; and
 - (iii) the metered data is made available to the Delivery Body in a format specified by the Delivery Body.
- (b) the calculation of DSR Volume may, where applicable, be made by substituting Settlement Period with DSR Alternative Delivery Period where that term is specified under Rule 1.2

9.2.1 The above partial recognition of ADP with the Rules means the Rules are ineffective.

9.2.2 Should the option of using ADP be:

- a) removed completely; or
- b) allowed more generally, but only where the higher frequency ADP can be aligned with BSC ½ hr SP.

Analysis – Not adopted as Surgery Item by CMAG26

10. Potential Surgery Items related to DSR CMU Component Register

At CMAG26 this section on DSR CMU Component Register (see slide 46) was NOT adopted as a Surgery Item

However, some additional analysis (beyond the original CP373 comments on Rules 2023) had already been undertaken ahead of CMAG26. No further analysis will be undertaken at this time.

10.1 Background

- 10.1.1 The proposed CMSB managed Component Register is intended to provide a unique identifier for each Component, to allow effective control over Components moving between DSR CMUs, where each Component may be given a CMU specific identifier.
- 10.1.2 This Component Register is not currently referred to at all within Rules, but is an operational means of effecting the controls set out in Rule 8.3.4 Changing DSR Components.

10.2 Rule 3.9.3 DSR Business Model

3.9.3 Business Model

- (a) Each Applicant for a Proven DSR CMU must include in the Application a business model for each DSR CMU Component that comprises that DSR CMU setting out the following:
- (i) the type of DSR effected by the DSR CMU Component;
 - (ii) a summary of the relationship between the DSR Provider and the DSR CMU Component;
 - (iii) to the extent not already provided in order to obtain a DSR Test Certificate, the information referred to in Rule 13.2.5; and
 - (iv) details of the programme or strategy for procuring that the DSR Capacity is available, including:
 - (aa) method(s) of achieving load reduction;
 - (bb) equipment controlled or installed, or to be controlled or installed; and
 - (cc) details of how the DSR Capacity of the DSR CMU has been secured to the DSR Provider.
- (b) Each Applicant for a Proven DSR CMU must declare that the business model:
- (i) is, to the best of its knowledge and belief, based on reasonable assumptions;
 - (ii) accurately describes the manner in which any DSR Capacity has been secured; and
 - (iii) is not misleading.

- 10.2.1 Should the Business Model be recorded as a set of attributes relating to the relationship between a DSR CMU and its Component?

10.3 Rules 7.4.1(a)(ic) CC, DRC, GTC, PFT by GU and 7.4.1(a)(id) DSR CMU Component description

7.4.1(a)(ic) a description of the CMU including (where applicable) each Generating Unit comprising such CMU and in the case of a Generating CMU, the Primary Fuel Type [PFT], Generating Technology Class [GTC], Connection Capacity [CC] and De-rated Capacity [DRC] for the CMU and the Primary Fuel, Generating Technology Class, Connection Capacity and De-rated Capacity for each Generating Unit comprising such CMU;

7.4.1(a)(id) a description of the CMU including (where applicable) each DSR CMU Component comprising such CMU and in the case of a Proven DSR CMU, whether it includes a Permitted On-Site Generating Unit and if so the Primary Fuel and generating capacity (in MW) of the Permitted On-Site Generating Unit;

- 10.3.1 PFT of a Generating CMU can already be changed after Application, under Rule 8.3.4A.

8.3.4A Primary Fuel Type

A Capacity Provider must notify the Delivery Body of a change in the Primary Fuel Type for a Generating CMU.

10.3.2 Could future CM policy allow GU to move between CMUs during the course of an Agreement? Currently this can only be achieved by cloning a CMU between Prequalification Windows and adding/removing GUs from the clones.

10.3.3 If CMSB are to maintain a DSR CMU Component Register, could that register also include Generating Units (GU)? This would have the benefits of:

- a) GUs to be part of different CMUs for different Auctions, Agreements and DYs;
- b) Allowing unique ID per GU, with key information about site, core generating plant, AMS, FFED, etc to be maintained through configuration within different CMUs;
- c) Connection controls by site would be easier to implement.

10.4 Rule 7.4.1(a)(ii) GU/Component description and GU GTC/PFT

7.4.1(a)(ii) a description of the CMU including (where applicable) each Generating Unit or DSR CMU Component comprising such CMU and in the case of a Generating CMU, the Primary Fuel Type and Generating Technology Class for the CMU;

10.4.1 Hasn't this requirement now been superseded by 7.4.1(a)(ic) and (id), as above?

Granularity	Data item	7.4.1(a)(ic)	7.4.1(a)(id)	7.4.1(a)(ii)
Generating CMU	GTC	Y		Y
	PFT	Y		Y
	CC	Y		
	DRC	Y		
GU	GTC	Y		
	PFT	Y		
	CC	Y		
	DRC	Y		
DSR CMU	GTC			
	PFT			
	CC			
	DRC			
Component	Permitted on-site Generator		Y	
	Generating Capacity		Y	
	GTC			
	PFT		Y	
	CC			
	DRC			

10.4.2 Should 7.4.1(a)(ii) be made 'Omitted'?

10.5 Rule 7.5.1(r) Change of location of GU or DSR CMU Component

7.5.1(r) in respect of a New Build CMU or a DSR CMU, where a Capacity Provider notifies the Delivery Body that the location of a Generating Unit(s) and/or DSR CMU Component(s), or of an

Interconnector CMU, is or will be different from the location described in the Application, within ten Working Days of receiving such notification;

10.5.1 If the DSR CMU Component Register were reflected in Rules then the reference to such Components in 7.5.1® could be moved to a new Rule concerning the DSR CMU Component Register.

10.6 Rule 7.5.1(ra) Change of GTC/PFT of GU or DSR CMU Component

7.5.1(ra) to record any change in the Primary Fuel Type or Generating Technology Class for a Generating CMU and the Primary Fuel or Generating Technology Class for each Generating Unit comprising such CMU notified to the Delivery Body;

10.6.1 Although Rule 8.3.4A provides for change of PFT, what's the basis for recording a change of GTC in the CMR?

10.6.2 The first 'issue' of a CMR is on Prequalification Results Day (PQRD) so any change of GTC in the DB Portal before then would not have been included in a CMR anyway.

10.6.3 Once a CMU has Prequalified is there is any Rule allowing for such a change in GTC?

10.7 Rule 8.3.4(h)(i)(bb) DSR CMU Component reallocation Metering Assessment

8.3.4(h)(i)(bb) complete a Metering Assessment in relation to that CMU;

10.7.1 This current Rule necessitates MA for the whole CMU rather than just for any changed Components.

10.7.2 Should a Surgery Item consider changing this Rule?

10.8 Rule 8.3.8 Declaration about other funding sources; 8.3.8A-B Determination of Relevant Benefit

8.3.8 Declarations about other funding sources

10.8.1 If CMSB are in receipt of DSR CMU Component reallocation, can these relate to Rx/Rb requirements?

10.8.2 We are aware that DSR MY Agreements involving Capex is already a low likelihood, so the chance of Rx/Rb applying to any such Agreement is even lower.

10.8.3 Consequently any change here is not a priority unless DESNZ/ofgem suggest otherwise.

10.9 Rule 8.3.11(a)

8.3.11 Fossil Fuel Emissions Declaration [\[FFED in Exhibit ZA\]](#): New Build, Refurbishing and Unproven DSR CMUs

(za) This Rule 8.3.11 applies subject to Rule 8.3.13A.

(a) Subject to Rule 8.3.11(c), a Capacity Provider must provide to the Delivery Body a Fossil Fuel Emissions Declaration by the deadline specified in Rule 8.3.11(b) if the CMU is a New Build CMU, Refurbishing CMU or an Unproven DSR CMU and the CMU comprises of at least one Fossil Fuel Component or at least one Storage Facility which has part or all of its electricity requirements met by an Associated Fossil Fuel Component.

[\[\(b\)\(i\) New Build by start of 1st DY or when Notice of Intention to Terminate after LSD is due to end, ie latest CMU can become Operational; others apply for Refurb and Unproven DSR\]](#)

10.9.1 Exhibit ZA FFED is for a CMU but details are provided for each FF Component. The FFED requires at Part 8 a declaration by Directors and Part 9 certification by the Independent Emissions Verifier.

10.9.2 The FFED includes at Part 7a commitment to provide an updated FFED as a result of any Emissions Related Material Change to the CMU or any FFC. Rule 1.2 Definition includes

Emissions Related Material Change	<p>(k) in respect of a CMU, means adding at least one Fossil Fuel Component with an Installed Capacity equal to or greater than 1MW or at least one Storage Facility which has part or all of its electricity requirements met by an Associated Fossil Fuel Component with an Installed Capacity equal to or greater than 1MW;</p> <p>(l) in respect of a Fossil Fuel Component or Associated Fossil Fuel Component with an Installed Capacity equal to or greater than 1MW, means adding or removing at least one fuel used to produce electricity or any other change which alters its Fossil Fuel Emissions or Fossil Fuel Yearly Emissions; and</p>
--	---

	(m) in respect of a Fossil Fuel Component or Associated Fossil Fuel Component with an Installed Capacity below 1MW, means any change which alters its Installed Capacity so that it is equal to or greater than 1MW.
--	--

(a) cannot apply to a Generating CMU, only a DSR CMU where Component change is allowed under 8.3.4.

(c) For a Generating Unit wouldn't this amount to a change in configuration in breach of Rule 4.4.4?

10.9.3 If an updated FFED is needed because of a Material Change, are updated $\text{gCO}_2/\text{kWh}_e$ for any other FFC also required as at the date of the updated FFED, or is a change only required for the impacted FFC?

10.9.4 Is a Surgery Item required discuss:

a) Simplifying the definition of Emissions Related Material Change (ERMC);

b) Clarifying if all FFC emissions need to be updated as result of an ERMC on one FFC.

11. Potential Surgery Items related to DSR Tests

At CMAG26 this section on DSRT (see slides 47-48) was NOT adopted as a Surgery Item

Consequently no further analysis has been done at this time, beyond extracting a copy of the original comments from the CP373 review of Rules 2023.

11.1 Background

11.1.1

11.2 Rule 8.3.2 DSR Test

8.3.2 DSR Tests

If an Unproven DSR CMU is awarded a Capacity Agreement:

- (a) the Capacity Provider must provide a DSR Test Certificate evidencing a Proven DSR Capacity greater than 1MW by no later than one month prior to the start of the first Delivery Year (or in the case of a CMU awarded a Capacity Agreement of a duration exceeding one Delivery Year, prior to the date falling one month before the commencement of the second Delivery Year of the Capacity Agreement);
- (b) if the Capacity Provider does not comply with Rule 8.3.2(a), then Rule 6.10.1(i) applies; and
- (c) if the Capacity Provider provides a DSR Test Certificate which evidences a Proven DSR Capacity in an amount less than its Unproven DSR Capacity and greater than 1MW:
 - (i) the Capacity Obligation; and
 - (ii) all payments (whether Capacity Payments or penalties),with respect to that CMU will be reduced by the proportion which the Proven DSR Capacity bears to the Unproven DSR Capacity, or, if applicable, in the case of a Joint DSR Test, the proportion which the aggregate Proven DSR Capacity bears to the aggregate Unproven DSR Capacity, in accordance with the calculation under Rule 13.2B.13.
- (d) in the case of a Joint DSR Test, where the Proven DSR Capacity of one or more DSR CMU is less than 1MW, Rule 6.10.1(d) applies.

8.3.2A Changes to DSR Components - Validity of DSR Test

Where a Capacity Provider has added and/or removed components from a DSR CMU pursuant to Rule 8.3.4, Rule 8.3.4(n) applies and the new DSR Test Certificate required under Rule 8.3.4(n)(iii) must be obtained subsequent to the final component addition or removal.

11.2.1

11.3 Rule 8.3.3A(b)(ii) Notifying Unproven DSR Test

8.3.3A(b) The date referred to in Rules 8.3.3A(a) and 8.3.3A(aa) is the earlier of the dates on which the Capacity Provider:

- (i) completes a Metering Assessment under Rule 8.3.3(b); or
- (ii) provides the Delivery Body with the information required in order to carry out a DSR Test under Rule 13.2.5, or a Joint DSR Test under Rule 13.2B.5.

11.3.1

11.4 Rule 8.3.4(n)(i) DSR CMU Component reallocation and DSR Test

8.3.4(n) Where this rule 8.3.4(n) applies:

- (i) the DSR Test Certificate for the relevant DSR CMU remains valid for the duration of the Capacity Agreement in respect of which the CMU carried out the DSR Test
- (ii) the DSR Test Certificate is not valid after the end of that Capacity Agreement; and
- (iii) the CMU must carry out a new DSR Test in accordance with Rule 13.2 or a new Joint DSR Test in accordance with Rule 13.2B to obtain a new DSR Test Certificate for any

subsequent Capacity Agreement no later than one month prior to the start of that Delivery year for that Capacity Agreement.

11.4.1

11.5 Rule 13.1.1 DSR Tests

13. Testing Regime

13.1 Purpose of this Chapter

The Rules prescribe the procedures for:

13.1.1 the DSR Test and Joint DSR Test;

11.5.1 See also 13.2A New DSR Test

11.5.2 See also 13.2B Joint DSR Test

11.5.3 See also 13.2C New Joint DSR Test

11.5.4

11.6 Rule 13.2.9 DB Notice of verified DSR Output (including Baseline Demand)

13.2.9 Within 5 Working Days of:

- (a) receipt of historic information under Rule 13.2.6(a) [[historic volumes <PQ](#)] above; or
- (b) receipt of data from the CM Settlement Body regarding Metered Volumes at the relevant meters during the relevant Settlement Periods referred to in Rule 13.2.6(b) [[DSRT](#)], the Delivery Body must, for each of the relevant Settlement Periods or DSR Alternative Delivery Periods in the case of Rule 13.2.6(a) above and for the activation Settlement Period in the case of Rule 13.2.6(b), notify the Applicant or Capacity Provider of its verified calculations of:
 - (i) Baseline Demand;
 - (ii) the DSR evidenced (which can be zero); and
 - (iii) the Proven DSR Capacity calculated by multiplying the DSR by two (and in the case of Rule 13.2.6(a) using the Settlement Period or DSR Alternative Delivery Periods which evidenced the lowest DSR).

11.6.1 See also 13.2A.6 equivalent for New DSR Tests

11.6.2 See also 13.2B.9 equivalent for Joint DSR Tests

11.6.3 See also 13.2C.6 equivalent for New Joint DSR Tests

11.6.4

11.7 Rule 13.2.11 DB Issues DSRT Certificate including metering

13.2.11 Within five Working Days of receipt of the notice under Rule 13.2.9, and provided that no notice has been issued under Rule 13.2.10, if applicable, the Delivery Body must issue a DSR Test Certificate to the Applicant or Capacity Provider (as applicable):

- (a) confirming that the DSR Test has occurred;
- (b) setting out the Proven DSR Capacity of the DSR CMU, which must be that notified by the Delivery Body pursuant to Rule 13.2.9; and
- (c) detailing the metering configuration for each DSR CMU Component comprised in the DSR CMU.

11.7.1 See also equivalent 13.2A.11 for New DSR Tests

11.7.2 See also equivalent 13.2B.11-12 for Joint DSR Tests

11.7.3 See also equivalent 13.2C.11 for New Joint DSR Tests

11.7.4

11.8 **13.2.12 DSRT Certificate invalid after a metering change for any Component**

13.2.12 Except as provided in 13.2.12B [advise CMSB of metering changes], a DSR Test Certificate issued pursuant to this Rule 13.2 will only be valid for the DSR CMU for so long as the details relating to the configuration of such DSR CMU as detailed pursuant to Rule 13.2.5 [metering/MA/MT to CMSB] remain valid. In the event that the DSR CMU configuration changes, such DSR CMU will be deemed to be an Unproven DSR CMU, subject to Rule 8.3.4(n), until such time as a new DSR Test Certificate has been issued.

13.2.14 Except as provided for by Rules 13.2.12E and 13.2B.23, a DSR Test Certificate will be invalidated if the Metering Test Certificate for a DSR CMU specifies a different metering configuration for any DSR CMU Component comprised in the DSR CMU than that specified in the DSR Test Certificate.

11.8.1 Note the different wording used in 13.2B.18A, where it makes clear that it Component reallocation (by reference to whole of 8.3.4) that can invalidate a Joint DSR Test, rather than just 8.3.4(n)

11.8.2

11.9 **Rule 13.2.12E DSR metering changes, DSRT Certificate remains valid for current DY**

13.2.12E Where one or more notifications have been made to the Settlement Body pursuant to Rule 13.2.12B [DSR metering change], the DSR Test Certificate for the relevant DSR CMU shall:

- (a) remain valid for the duration of the Capacity Agreement in respect of which the CMU carried out the DSR Test; and
- (b) not be valid after the end of that Capacity Agreement, and a new DSR Test Certificate will be required for any subsequent Delivery Year no later than six weeks prior to that Delivery Year.

11.9.1 Does not specifically address if DSRT remains valid for remaining DY of a MY Agreement (see 13.2B.3(d) re deadline for a Joint DSR Test for a MY Agreement)

11.9.2 Meanwhile, confused between

- a) 13.2.5 provide metering and 13.2.12B metering changes and 12C MA and 12D MT; and
- b) 13.2.12 subject to 12B, DSRT Certificate only remains valid while 5 configurations remains valid

11.9.3

11.10 **Rules 13A.2.4(c)(ii); 13A.2.7(c)(ii); 13A.3.4(d)(ii); 13A.3.7(c)(ii); 13A.4.5(d)(ii); 13A.4.8(c)(ii); 13A.5.4(c)(ii); 13A.5.7(c)(ii); Invalidated MT so DB advised of need for New DSR Test**

13A.2 Failure to notify a change to the metering configuration

:

13A.2.4 Where this Rule applies:

- (a) a Capacity Provider's Metering Test Certificate is invalidated;
- (b) the CM Settlement Body must notify a Capacity Provider that its Metering Test Certificate has been invalidated and that the Capacity Provider must repay the capacity payments it has received in accordance with Rule 13A.8.4;
- (c) if a Capacity Provider also has a DSR Test Certificate, the CM Settlement Body must:
 - (i) notify the Delivery Body as soon as reasonably practicable that the Capacity Provider's Metering Test Certificate has been invalidated; and
 - (ii) notify the Delivery Body that a new DSR Test or new Joint DSR Test is required in accordance with Rule 13.2A or Rule 13.2C respectively; and
- (d) unless a new DSR Test or new Joint DSR Test under paragraph (c)(ii) confirms the accuracy of the existing DSR Test Certificate the Capacity Provider's existing DSR Test Certificate is invalidated.

:

13A.2.7 Where this Rule applies:

- (a) a Capacity Provider's Metering Test Certificate is invalidated;
- (b) the CM Settlement Body must notify a Capacity Provider that its Metering Test Certificate has been invalidated and that the Capacity Provider must repay the capacity payments it has received in accordance with Rule 13A.8.2;
- (c) if a Capacity Provider also has a DSR Test Certificate, the CM Settlement Body must:
 - (i) (notify the Delivery Body as soon as reasonably practicable that the Capacity Provider's Metering Test Certificate has been invalidated; and
 - (ii) notify the Delivery Body that a new DSR Test or new Joint DSR Test is required in accordance with Rule 13.2A or Rule 13.2C respectively; and
- (d) unless a new DSR Test under paragraph (c)(ii) confirms the accuracy of the existing DSR Test Certificate the Capacity Provider's existing DSR Test Certificate is invalidated.

:

13A.3 Errors with the submission of data

:

13A.3.4 Where this Rule applies:

- (a) a Capacity Provider's Metering Test Certificate is invalidated;
- (b) the CM Settlement Body must notify a Capacity Provider that its Metering Test Certificate has been invalidated and that the Capacity Provider must repay the capacity payments it has received in accordance with Rule 13A.8.4;
- (c) if a rectification plan was submitted under Rule 13A.3.2(b), the Capacity Provider must:
 - (i) undertake any repairs to the Metering Equipment in accordance with that plan; or
 - (ii) notify the CM Settlement Body that the repairs have been completed within five Working Days of completion;
- (d) if a Capacity Provider also has a DSR Test Certificate, the CM Settlement Body must:
 - (i) notify the Delivery Body as soon as reasonably practicable that the Capacity Provider's Metering Test Certificate has been invalidated; and
 - (ii) notify the Delivery Body that a new DSR Test or new Joint DSR Test is required in accordance with Rule 13.2A or 13.2C respectively; and
- (e) unless a new DSR Test or Joint DSR Test under paragraph (d)(ii) confirms the accuracy of the existing DSR Test Certificate the Capacity Provider's existing DSR Test Certificate is invalidated.

:

13A.3.7 Where this Rule applies:

- (a) a Capacity Provider's Metering Test Certificate is invalidated;
- (b) the CM Settlement Body must notify a Capacity Provider that its Metering Test Certificate has been invalidated and:
 - (i) if the fault is corrected by the Capacity Provider in accordance with Rule 13A.3.2(a), the Capacity Provider must repay the capacity payments it has received in accordance with Rule 13A.8.2; or
 - (ii) if repairs are required under a rectification plan submitted under Rule 13A.3.2(b) the Capacity Provider must:
 - (aa) undertake any repairs to the Metering Equipment in accordance with the rectification plan submitted;

- (bb) notify the CM Settlement Body that the repairs have been completed within five Working Days of completion (the “completion notice”); and
- (cc) repay the capacity payments it has received in accordance with Rule 13A.8.3;
- (c) where a Capacity Provider also has a DSR Test Certificate, the CM Settlement Body must:
 - (i) notify the Delivery Body as soon as reasonably practicable that the Capacity Provider’s Metering Test Certificate has been invalidated; and
 - (ii) notify the Delivery Body that a new DSR Test or new Joint DSR Test is required in accordance with Rule 13.2A or 13.2C respectively.

:

13A.4 Faulty Metering Equipment

:

13A.4.5 Where this Rule applies:

- (a) a Capacity Provider’s Metering Test Certificate is invalidated;
- (b) the CM Settlement Body must notify a Capacity Provider that its Metering Test Certificate has been invalidated and that the Capacity Provider must repay the capacity payments it has received in accordance with Rule 13A.8.4;
- (c) if a rectification plan was submitted under Rule 13A.4.3(b) required, the Capacity Provider must:
 - (i) undertake any repairs to the Metering Equipment in accordance with that plan; or
 - (ii) notify the CM Settlement Body that the repairs have been completed within five Working Days of completion;
- (d) where a Capacity Provider also has a DSR Test Certificate, the CM Settlement Body must:
 - (i) notify the Delivery Body as soon as reasonably practicable that the Capacity Provider’s Metering Test Certificate has been invalidated; and
 - (ii) notify the Delivery Body that a new DSR Test or new Joint DSR Test is required in accordance with Rule 13.2A or Rule 13.2C respectively; and
- (e) unless a new DSR Test or new Joint DSR Test under paragraph (d)(ii) confirms the accuracy of the existing DSR Test Certificate the Capacity Provider’s existing DSR Test Certificate is invalidated.

:

13A.4.8 Where this Rule applies:

- (a) a Capacity Provider’s Metering Test Certificate is invalidated;
- (b) the CM Settlement Body must notify a Capacity Provider that its Metering Test Certificate has been invalidated and:
 - (i) if the fault is corrected by the Capacity Provider in accordance with Rule 13A.4.3(a), the Capacity Provider must repay the capacity payments it has received in accordance with Rule 13A.8.2; or
 - (ii) if repairs are required under a rectification plan submitted under Rule 13A.4.3(b) the Capacity Provider must:
 - (aa) undertake any repairs to the Metering Equipment in accordance with the rectification plan submitted;
 - (bb) notify the CM Settlement Body that the repairs have been completed within five Working Days of completion (the “completion notice”); and
- (cc) repay the capacity payments it has received in accordance with Rule 13A.8.3;

- (c) where a Capacity Provider also has a DSR Test Certificate, the CM Settlement Body must:
 - (i) notify the Delivery Body as soon as reasonably practicable that the Capacity Provider's Metering Test Certificate has been invalidated; and
 - (ii) notify the Delivery Body that a new DSR Test or new Joint DSR Test is required in accordance with Rule 13.2A or Rule 13.2C respectively; and
- (d) unless a new DSR Test or new Joint DSR Test under paragraph (c)(ii) confirms the accuracy of the existing DSR Test Certificate the Capacity Provider's existing DSR Test Certificate is invalidated.

:

13A.5 Submission of incorrect information

:

13A.5.4 Where this Rule 13A.5.4 applies:

- (a) a Capacity Provider's Metering Test Certificate is invalidated;
- (b) the CM Settlement Body must notify the Capacity Provider that its Metering Test Certificate has been invalidated and that the Capacity Provider must repay the capacity payments it has received in accordance with Rule 13A.8.4;
- (c) if a Capacity Provider also has a DSR Test Certificate, the CM Settlement Body must:
 - (i) notify the Delivery Body as soon as reasonably practicable that the Capacity Provider's Metering Test Certificate has been invalidated; and
 - (ii) notify the Delivery Body that a new DSR Test or new Joint DSR Test is required in accordance with Rule 13.2A or 13.2C respectively; and
- (d) unless a new DSR Test or new Joint DSR Test under paragraph (c)(ii) confirms the accuracy of the existing DSR Test Certificate the Capacity Provider's existing DSR Test Certificate is invalidated.

:

13A.5.7 Where this Rule 13A.5.7 applies:

- (a) a Capacity Provider's Metering Test Certificate is invalidated;
- (b) the CM Settlement Body must notify the Capacity Provider that its Metering Test Certificate has been invalidated and that the Capacity Provider must repay the capacity payments it has received in accordance with Rule 13A.8.2;
- (c) if a Capacity Provider also has a DSR Test Certificate, the CM Settlement Body must:
 - (i) notify the Delivery Body as soon as reasonably practicable that the Capacity Provider's Metering Test Certificate has been invalidated; and
 - (ii) notify the Delivery Body that a new DSR Test or new Joint DSR Test is required in accordance with Rule 13.2A or 13.2C respectively; and
- (d) unless a new DSR Test or new Joint DSR Test under paragraph (c)(ii) confirms the accuracy of the existing DSR Test Certificate the Capacity Provider's existing DSR Test Certificate is invalidated.

11.10.1

12. Potential Surgery Items related to Satisfactory Performance Days (SPD) and Extended Performance Tests (EPT)

At CMAG26 this section on SPD (see slide 49) was NOT adopted as a Surgery Item

Consequently no further analysis has been done at this time, beyond extracting a copy of the original comments from the CP373 review of Rules 2023.

12.1 Background

12.1.1

12.2 Rule 13.4.1 CP to prove SPD to DB and 13.4.4 DB to verify SPD

13.4.1 Subject to Rules 13.4.1A, 13.4.1B, and the modifications in Chapter 9, a Capacity Committed CMU must demonstrate to the Delivery Body in accordance with Rule 13.4.2 capacity at a level equal to or greater than its Capacity Obligation or aggregate Capacity Obligations for at least one Settlement Period (which Settlement Periods may fall within a System Stress Event), on three separate days (each a "Satisfactory Performance Day") during the Winter of the relevant Delivery Year, of which at least one Satisfactory Performance Day must occur during the period from 1 January to 30 April (both dates inclusive) for that Delivery Year.

:

13.4.4 The Delivery Body must notify the Capacity Provider within 10 Working Days of having received the settlement and metering information necessary to prove fulfilment of a Satisfactory Performance Day that any Satisfactory Performance Day notified in accordance with Rule 13.4.2 is not a Satisfactory Performance Day properly notified in accordance with this Rule 13.4.

:

13.4.7 The Delivery Body must notify the CM Settlement Body of:

- (a) any failure by a Capacity Committed CMU to satisfy its obligations under Rule 13.4.1 that suspends the Capacity Committed CMU's entitlement to Capacity Payments;
- (b) if any suspended Capacity Payments should be paid to the Capacity Committed CMU under Rule 13.4.1ZC(c) and from which date; and
- (c) the date on which a Capacity Committed CMU's entitlement to Capacity Payments resumes, as determined by Rule 13.4.1ZA(b).

12.2.1 Current 'automated' SPD by CMSB, from which DB see if CMUs have met SPD

12.2.2 Current 'manual' process by DB for SPD Portfolios

12.2.3 If/when should responsibility for assessing/monitoring SPDs move from DB to CMSB?

12.3 Rule 13.4A EPT managed by DB (including DB In 9(c)/12-14)

13.4A.3 In this Rule 13.4A, "extended performance" means:

- (a) for a Capacity Committed CMU in a Storage Generating Technology Class that is Duration Limited (or a Capacity Committed CMU that is an Unproven DSR CMU to which Rule 13.4A.3A applies), a performance of capacity at a level equal to or greater than its Adjusted Connection Capacity for the number of consecutive Settlement Periods that is equivalent in duration to the specified minimum duration for that Storage Generating Technology Class; and
- (b) for a Capacity Committed CMU in a Storage Generating Technology Class that is not Duration Limited (or a Capacity Committed CMU that is an Unproven DSR CMU to which Rule 13.4A.3B applies), a performance of capacity at a level equal to or greater than its Adjusted Connection Capacity for the number of consecutive Settlement Periods that is equivalent in duration to the specified minimum duration for the shortest-duration Storage Generating Technology Class that is not Duration Limited.

:

13.4A.9(c) If a decision of the Delivery Body has resulted in the incorrect suspension of one or more Capacity Payments under Rule 13.4A.7(b), those Capacity Payments should be paid to the Capacity Committed CMU as soon as practicable after the reconsidered decision or the appeal to the Authority is determined.

:

13.4A.12 The Capacity Provider of a Capacity Committed CMU must notify the Delivery Body by the following dates (whichever applies) that the Capacity Committed CMU has demonstrated extended performance:

- (a) by the end of Winter in the relevant Delivery Year;
- (b) if Rule 13.4A.7 applies, by 1 August of the Delivery Year; and
- (c) if Rule 13.4A.11 applies, by the extended date given by the Secretary of State under Regulation 33(2)(b).

13.4A.13 The Delivery Body must notify the Capacity Provider within 10 Working Days of having received the settlement and metering information necessary to prove extended performance has been demonstrated if it is aware that any extended performance notified in accordance with Rule 13.4A.12 is not extended performance properly notified in accordance with this Rule 13.4A.

13.4A.14 The Delivery Body must notify the CM Settlement Body of:

- (a) any failure by a Capacity Committed CMU to satisfy its obligations under Rule 13.4A.2 that suspends the Capacity Committed CMU's entitlement to Capacity Payments;
- (b) if any suspended Capacity Payments should be paid to the Capacity Committed CMU under Rule 13.4A.9(c) and from which date; and
- (c) the date on which a Capacity Committed CMU's entitlement to Capacity Payments resumes, as determined by Rule 13.4A.7(b).

12.3.1

13. Potential Surgery Items related to SO v DB provision of information

At CMAG26 this section on SO data provision (see slide 51) was NOT adopted as a Surgery Item

Consequently no further analysis has been done at this time, beyond extracting a copy of the original comments from the CP373 review of Rules 2023.

13.1 Background

13.1.1

13.2 Rule 14.4.2(b) SO provides 'Declared Availability' and Contracted Output' to CMSB but SO have never done that, it has always been DB from data submitted by CP

14.4 System Operator and Delivery Body: Data provision

:

14.4.2 The System Operator must provide to the CM Settlement Body in respect of each Settlement Period in which a System Stress Event occurs, for each Capacity Committed CMU which is a Generating CMU (comprised of BM Units, or not):

- (a) details of whether the CMU components comprised in that CMU were providing a Relevant Balancing Service in that Settlement Period and, if so, which Relevant Balancing Service;
- (b) values for "Declared_Availability" and "Contracted_Output" for the CMU components comprised in that CMU in accordance with Schedule 4; and
- (c) any other values, except those referred to in Rule 14.4.1(a) and Rule 14.4.2(c), required for the calculation of ALFCO for the CMU components comprised in that CMU.

13.2.1

14. Potential Surgery Items related to terminology

[Split from section 5 on Terminology where Sch 6 issues were adopted as a Surgery Item]

At CMAG26 this section on Rx/Rb terminology (see slide 44) was NOT adopted as a Surgery Item

Consequently no further analysis has been done at this time, beyond extracting a copy of the original comments from the CP373 review of Rules 2023.

14.1 Background

14.1.1

14.2 Rule 14.6.2(c) Relevant Expenditure or Relevant Benefit reduction in payments to Capacity Providers

14.6 Other funding sources: Data provision

:

14.6.2 The data referred to in Rule 14.6.1 means, in respect of any Capacity Provider that has made a Funding Declaration under Rule 6.6.1:

- (a) the identity of the Capacity Provider;
- (aa) the total amount of Relevant Benefit that has been, or will be, received;
- (b) the total amount of Relevant Expenditure that has been, or will be, incurred; and
- (c) the amount to be deducted from the credit otherwise payable to the Capacity Provider under the Regulations.

14.2.1

Appendices

CM Metering Register (CMMR) [CMAG26 slides 35-36]

From the EMRS website

====

Capacity Market Metering Register

On behalf of Electricity Settlements Company, we publish the Capacity Market Metering Registers. The registers maintain details that are essential in the administration and settlement of the Capacity Market, including:

- Metering Test requirements
- Metering Assessment requirements
- Status of DSR Components
- Metering identification codes and if there are any changes to these

The registers validate metered data to ensure Capacity Providers are complying with Chapter 7 of the [Capacity Market Rules](#). The registers will be published in accordance with the timeframes as set out in the [Capacity Market Rules](#).

To help interpret the file name of the registers to ensure you've selected the correct register, let's use **T-4-2019(DY-2024)-31_07_2024** as an example. We've summarised this as follows:

- **2019** refers to the first Delivery Year for that auction (e.g. [T-4 2014 Auction](#))
- **DY-2024** is the current Delivery Year when we produce the report
- **31_07_2024** the last date in the filename is the date the file was generated

Do note, that the Delivery Year is always the current year, except where we show the first Delivery Year for Auctions, those Delivery Year starts in the future (e.g. T-4-2026(DY-2026)-31_07_2024).

Please also note that filtering by Company Name will display CMU rows, but not individual components. Metering Identifiers are associated with components, not CMUs, so you will not be able to view Metering Identifiers when filtering by Company Name

For more information about the registers, please see [G1 – Capacity Market Metering](#), [G20 – Capacity Market Metering Statement](#) and [G25 – My EMRS User Guide](#).

====

Note that the naming convention detailed above differs from that for the CMR by DB













CMMR Metering-Register-T-<n>-<1stDY>-<fileDY>-<dd_mm_yyyy>.csv

CMR Capacity Market Register <1stDY> (T-<n>) - <dd_mm_yyyy>.csv

Consequently the CMMR is by Auction, but for a T-4 or T-3 Auction will have a different set of files for each DY for MY Agreements.

It should also be noted that the CMR files names have varied somewhat over the years, with early files incorporating the Prequalification Window year instead of the 1st DY.

Downloading a 'set' of these CMMR from EMRS shows the following:

Name	Date modified	Type	Size
✓ Today (12)			
 Metering-Register-T-4-2019DY-2024-13_11_2024	13/11/2024 08:29	Microsoft Excel Com...	16 KB
 Metering-Register-T-1-2024DY-2024-13_11_2024	13/11/2024 08:29	Microsoft Excel Com...	29,278 KB
 Metering-Register-T-4-2027DY-2027-13_11_2024	13/11/2024 08:29	Microsoft Excel Com...	21,065 KB
 Metering-Register-T-4-2023DY-2024-13_11_2024	13/11/2024 08:29	Microsoft Excel Com...	21 KB
 Metering-Register-T-4-2021DY-2024-13_11_2024	13/11/2024 08:29	Microsoft Excel Com...	7 KB
 Metering-Register-T-4-2020DY-2024-13_11_2024	13/11/2024 08:29	Microsoft Excel Com...	31 KB
 Metering-Register-T-3-2022DY-2024-13_11_2024	13/11/2024 08:30	Microsoft Excel Com...	8 KB
 Metering-Register-T-4-2026DY-2026-13_11_2024	13/11/2024 08:30	Microsoft Excel Com...	3,695 KB
 Metering-Register-T-1-2023DY-2024-30_09_2024	13/11/2024 08:30	Microsoft Excel Com...	3,681 KB
 Metering-Register-T-4-2025DY-2025-13_11_2024	13/11/2024 08:31	Microsoft Excel Com...	723 KB
 Metering-Register-T-4-2024DY-2024-13_11_2024	13/11/2024 08:31	Microsoft Excel Com...	285 KB
 Metering-Register-T-4-2018DY-2024-13_11_2024	13/11/2024 08:31	Microsoft Excel Com...	16 KB

The increase in the number of DSR CMU Components since 2023 that has impacted CMR file sizes can also be seen as having a similar impact on CMMR file sizes.

Note that these files are published as CSV files and therefore are NOT formatted in any way. This inevitably makes them much more difficult to use by a third party who wishes to do more than just access their own metering information via My EMRS. This leads to specific problems when loading such files in Excel, eg

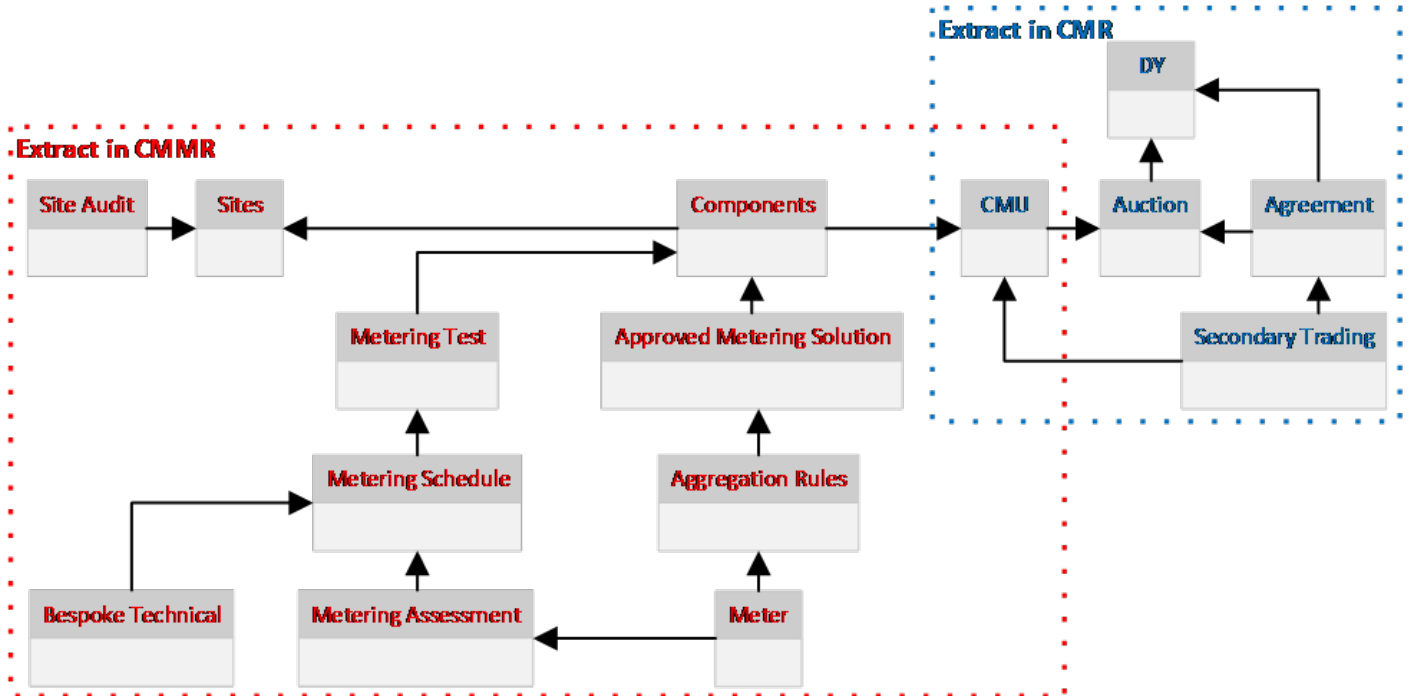
- Header row not formatted
- Freeze panes not set
- Data Filter not set
- Numeric MEIDs
 - starting with 0 dropping that 0, and
 - those that do not start with 0 being displayed as large numbers (eg 1.47E+12 instead of '1470000473765')

Should this be raised as a Surgery Item at CMAG?

These CMMR files also suffer from the same underlying issue as CMR files, that they are squashing multi-dimensional data into a two-dimensional spreadsheet, for example:

- CMU reference data (columns C-F) from the CMR is only included in the CMU rows and not on the related GU/Component rows, making filtering of rows by those attributes impossible;
- Column I MPANs and K MSIDs may contain multiple MEID per CMU GU/Component;

These problems arise because of the underlying data model which can be pictured as follows:



Should this be raised as a Surgery Item at CMAG?

Also note that under Rule 8.3.3(f)(ii) the CMU must notify CMSB of any changes in metering configuration or under 8.3.3(f)(vii) replacement metering equipment. As a consequence, a Site or individual Components may have multiple AMS during their lifetime, which may relate to configuration within different CMUs and relating to different periods of Agreements (or transferred parts thereof).

This means the CMMR should also:

- contain AMS effective dates; and
- provide for multiple AMS records, with different metering information, per Component.

Should this be raised as a Surgery Item at CMAG?

CMMR Format

The following is a list of the column headings used in the CMMR CSV files:

col	CMMR Column Headings	Format
	CMR REFERENCE DATA	
A	Unique CMU Identifier	6A/N
B	Component ID	A/N
C	Unique Agreement Identifier	CAN-<YYYY>-<CMUID>-<nnn>
D	Name of Applicant	A/N
E	CM Unit Type	List (G/I/D, E/P, N/U, R)
F	CM Unit Category	CMRS/Non-CMRS
G	Address of the Component(s)	A/N
H	OS Grid reference for CMU Component(s)	AA NNN NNN
	CMMR DATA	
I	Meter Point Administration Numbers	13N
J	BM Unit ID	A_AN
K	Metering System Identifier (MSID)	Upto 18AN
L	Date by which Metering Assessment must be completed	dd/mm/yyyy
M	Date of Meter assessment completion	dd/mm/yyyy
N	Notification of successful completion of Metering Assessment	Yes/No
O	Proposed Metering Option?	List (BMU/BSC/BS/Bespoke)
P	Meter Used for other Purposes	No/Yes <clarifier>
Q	Description of metering arrangements	Narrative
R	Where you have an approved Metering Dispensation under the BSC please provide the reference number (D/###)?	D/<nnn>
S	Do you have any connections to the CMU Component that are not part of the Metered Entity Identifiers (MEID) list provided to be used in the aggregation rule for the CMU?	Yes/No
T	Do you have any ineligible generation behind a Meter Point (i.e. would be included in the metered data of a Metered Entity Identifier used by the CMU Component)?	Yes/No
U	Are you using a BSC Settlement submission route (i.e. D0357 MPAN flow or BMU) for all your CMU metered data?	Yes/No
V	Metering Test Required	Yes/No
W	Metering Assessment Required	Yes/No
X	Meter Test Certificate issue date	dd/mm/yyyy
Y	DSR Component Status	List
Z	DSR Component Status Change Date	dd/mm/yyyy

We understand a Metering Assessment (in My EMRS) is always required, hence why columns K-L

Therefore, should column V actually be (Schedule 6) 'Metering Statement required' (for a Metering Test or Site Audit)?

There is no reference to a Site Audit being required, or when it has been carried out, should this be in a public CMMR?

There is also no reference to a requirement for Schedule 7 'Bespoke Technical Requirement' and when that is met, or is that considered a prerequisite for a column P with Bespoke Metering Configuration?

Should these be raised as a Surgery Item at CMAG?