

Duplicate MPANs sub-group

Meeting 2

CMAG Secretariat

1 April 2026



Health & Safety

In case of an emergency

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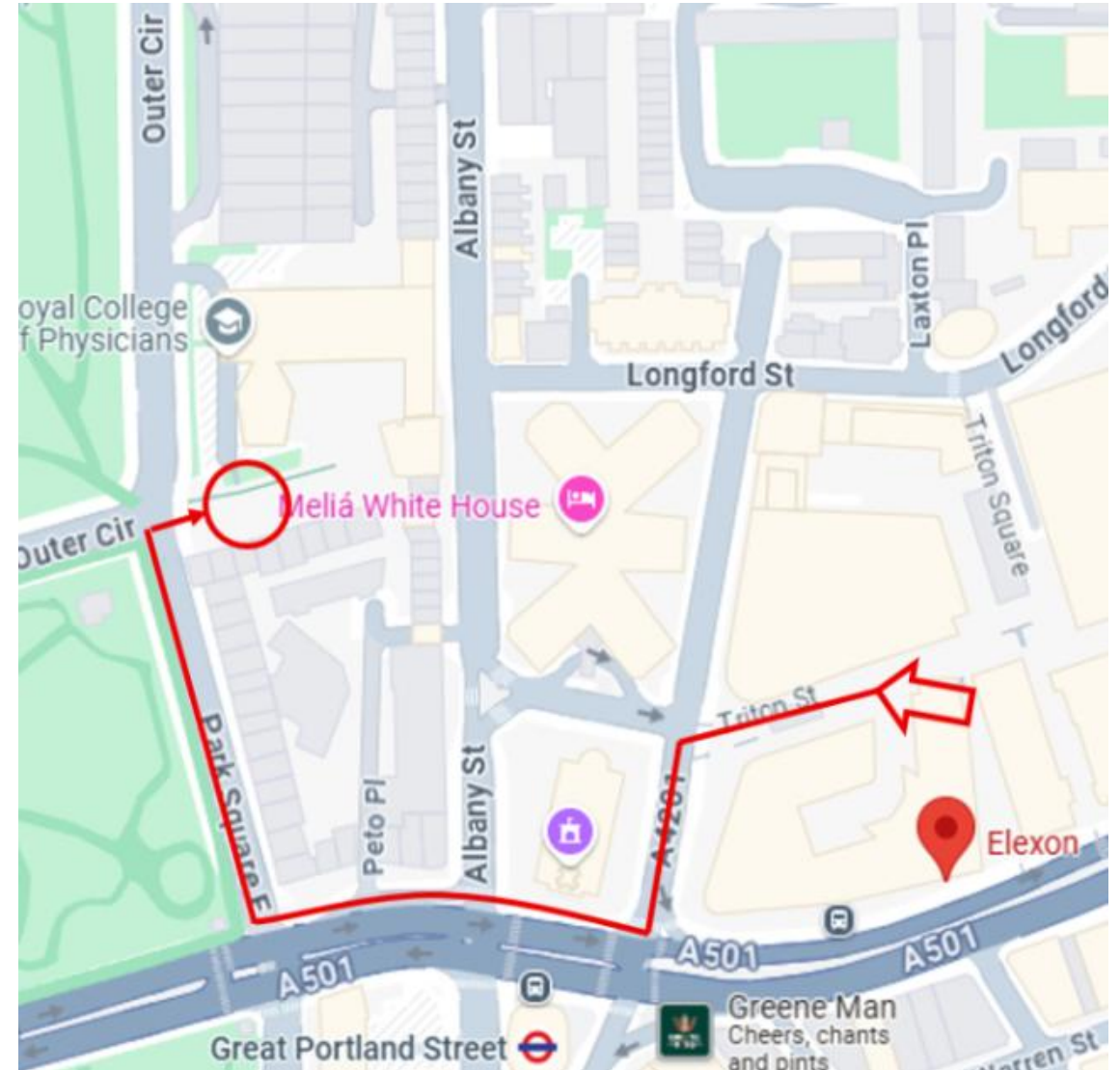
Evacuating 350 Euston Road

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- Please do not tackle a fire yourself.
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- Evacuate by the nearest signposted fire exit and walk to assembly point.
- Please remain with a member of Elexon staff and await further instruction from a fire warden.
- For visitors unable to use stairs, a fire warden will guide you to a refuge point and let the fire brigade know where you are.

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- the all clear has been given by the fire warden or ground floor security.

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Meeting Agenda

Agenda Item	paper	Lead
Welcome and Apologies		Matthew Woolliscroft (Chair)
Windows for DSR Tests		Jenny McGowan
Component Reallocation		Jenny McGowan
FMAR and CCS		Matthew Woolliscroft
Educating Customers		Matthew Woolliscroft
Consumer choice		Matthew Woolliscroft
Conflict resolution process		Matthew Woolliscroft
Wrap up and next steps		Matthew Woolliscroft
Any other business (A.O.B.)		All

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

Windows for DSR Tests

Previous discussion

At meeting 1, sub-group members expressed that being able to complete DSR Tests between Prequalification and the capacity auction would improve the confidence they had in their ability to deliver capacity going into the auction.

It was suggested that allowing DSR tests to be completed during this time could improve the effectiveness of the Capacity Market.

For the 2026/27 DY (T-1):

- the prequalification window opened 05/08/2025
- Agreements awarded 31/03/2026

Rule 13.2.2

13.2.2: DSR Test can be:

- a) Before Prequalification window
- b) After Capacity Agreement awarded up to 1 month before start of Delivery Year
- c) Where components removed or added, after notification of addition/removal and before start of subsequent Delivery Year
- d) For multi year agreements, up to 1 month before start of second Delivery Year

13.2.3: No DSR Test may take place during the Prequalification Assessment Window for any Capacity Auction.

Rationale for limiting test window

Between prequal and the auction, SB resources are focusing on preparing for the auction and so may not be able to undertake the administrative burden of processing DSR Tests

Being able to complete DSR tests to 'Prove' a CMU doesn't illuminate the possibility that multiple CMUs will try to register the asset.

- Is this within the scope of the Duplicate MPANs review?
- Would it be better assessed and progressed (if there is sufficient appetite to do so) outside of this workstream?

Our conclusion

While an increased window might give Capacity Providers greater confidence in their ability to deliver on any awarded agreement, it is not immediately evident, how this change will help address the duplicate MPANs issue.

We believe that if there is appetite to change the window during which DSR Tests can be completed, this is best progressed as an industry led initiative outside of this workstream.

Component reallocation

Previous discussion

At meeting 1, sub-group members expressed frustration that the limit for reallocation of Boundary Point metering had increased to 20% of a CMUs components, but that asset metering, which used the Bespoke Metering Configuration Solution was still limited to 40 components.

Members commented that allowing more liquidity in reallocating components would make the challenge of registering components during the registration period less urgent as any missed components could be corrected at a later date.

The change to 20%

CM Rules amendment 2024 (no.3) changed Rule 8.3.4(j) to:

For each CMU, a notification pursuant to Rule 8.3.4(e) can be made no more than ten times within a Delivery Year, and the number of DSR CMU Components which the Capacity Provider may add must not exceed within one Delivery Year:

- i. where the CMU uses the Balancing Services Metering Configuration Solution or Supplier Settlement Metering Configuration Solution, the greater of:
 - (aa) 20 per cent of the total number of DSR CMU Components which it holds at the time of the notification under Rule 8.3.4(e); and
 - (bb) forty DSR CMU Components,
- ii. where the CMU uses the Bespoke Metering Configuration Solution, forty DSR CMU Components.

Impact of CP392

- CP392 allows CoP11 asset metering to be used for CM settlement purposes
- It is included in Ofgem's spring Statutory Consultation with a minded to approve position
- It will introduce the definition of an Asset Metering System and include in in the definition of BSC Settlement Metering Configuration
- Housekeeping change required to update the reference in Rule 8.3.4(j) that was missed by CP392

Our conclusion

CP392 will go some way to enabling greater levels of within Delivery Year Component Reallocation once fully delivered

If there is appetite to increase the threshold further, this would be best progressed as a separate piece of work.

Whilst allowing greater component reallocation will enable Capacity Providers to manage their portfolio, it is not clear that it will directly address the issue of registration conflicts ahead of a Delivery Year

FMAR and CCS

Previous discussions

At meeting 1, sub-group members questioned whether the Flexibility Market Asset Register (FMAR) could be used a 'single source of the truth' to easily determine which flexibility provider has contractual control of an asset.

The sub-group also questioned whether the Consumer Consent Solution could be used to allow consumers to make an explicit choice between two Capacity Providers where an MPAN conflict arose.

FMAR

Timescales and scope for FMAR

- Timeline TBC, expect data standard and registration process to be approved by end of year
- CM not in scope, unclear whether this will change in future

Data expected to be on FMAR

- Admin user/service provider onboarding.
- Service provider registration
- Asset registration

FMAR

Will an asset be restricted to one FSP at any given time?

- FMAR is registration platform only, at this point the asset re-allocation (operational ownership of assets) is out of scope of FMAR.

What work FMAR is doing to establish best practice for consumer engagement

- engaging with FSPs to review the user journey, but it is still in progress and not confirmed. The final design including customer journey will go through consultation as well.

CCS

Designed to create a consistent approach across the industry to how consent for accessing consumers personal data is managed.

Focussed on validating that consent to access personal data has been given by the data owner to allow the data requestor to access the data

Built to establish personal data permissions rather than commercial preferences

Unclear how the CCS as it is currently envisaged can be used to allow consumers to choose service providers.

Our conclusion

FMAR:

It is unclear whether a future iteration of the FMAR solution will be able to support a long term solution as there are outstanding questions on its applicability

Either way it is unlikely to be fully operational for several years and so a CM solution will be needed for at least the next few years

CCS:

Focused on managing access to consumer's personal data rather than choosing commercial services

No mechanism in its current planned form to facilitate choosing service providers

Educating consumers

Previous discussions

At meeting 1, sub-group members agreed that the process of Capacity Providers signing up new consumers was inconsistent and did not always include sufficient detail on what agreements and limitations were being made

A common approach

As the CM Rules don't govern the relationship between Capacity Providers and their customers, we do not believe it would be appropriate to use it as a mechanism to standardise the approach CPs take to engaging with potential new customers

We would support a consistent approach to how consumers are made aware of the rights and responsibilities they have by participating in the CM, but believe this should be an industry led initiative through a suitable forum.

Consumer choice

Previous discussions

At meeting 1, sub-group members commented that while consumers sign up with flexibility providers often they will not understand the specific markets being used

If we're assuming that a consumer won't know what the CM is – only that they have agreed for you to flex their demand in exchange for compensation or preferable terms, is the consumer reasonable well enough informed to be able to engage with the Capacity Market to make a choice?

Role of consumer

The CM Settlement Body has no relation with electricity consumers. No mechanism nor appropriate for the Settlement Body to contact consumers.

- If the consumer doesn't know what the CM is, being contacted by the SB may be confusing.
- Similar to the Supplier Hub principle in the BSC, engagement with consumers should be done through Capacity Providers that have an established relationship with consumers

Will it be a bad CX if both CPs contact the consumer in relation to the conflict? Might this feel like being bombarded? Should one CP lead consumer comms?

Unresponsive consumer

What happens where the consumer is uncontactable (or refuses to make a choice)?

Is there an argument that if the consumer does not engage, then neither competing CP can have contractual DSR control?

having the right (whether by ownership or pursuant to contract notwithstanding that terms and conditions may apply to its exercise) exclusively to control all or part of the metered volume of any demand side response CMU component to provide demand side response when required to do so in that delivery year.

2 last resort options:

- First come first served
- Exclude the asset

Registration and conflict resolution process

Pre-registration processes

Previous discussions

At meeting 1, sub-group members expressed support for having a 'pre-registration' window between Prequalification and a capacity auction.

Members believed the effectiveness of a pre-registration process would be better if all DSR CMUs pre-registered their assets, to give the Settlement Body a complete data set.

However, members noted that placing additional administrative burden on non-domestic DSR may impact their desire to participate in the CM.

Asset notification window

Should the notification of MPANs be mandatory for Unproven DSR CMUs and optional for Proven DSR CMUs?

- Unproven DSR CMUs are the main issue
- Will an Unproven DSR CMU that doesn't know what assets it intends to use be able to comply?
- Does this provide a way to split DSR to avoid unnecessary burden on larger DSR?
- Checks can validate against submissions from other Unproven DSR CMUs and known assets in Proven DSR CMUs to identify duplication
- Settlement Body notifies both Capacity Providers where a conflict is identified as part of 'pre-registration'

Asset notification window – incentivising participation

Should the process be mandatory for anyone?

- Unproven DSR CMUs: a CP that doesn't yet know which MPANs will comprise its CMU will not be able to submit
- Proven DSR CMUs: will know what MPANs their CMU comprises, but are less of an issue, would this place unnecessary burden on them?

Rather than making it mandatory, can we incentivise by giving preferential treatment to CMUs that partake in the 'pre registration window'?

- If an Unproven CMU submits an MPAN in the 'pre registration window' that is not part of another CMUs submission or part of a Proven DSR CMU, should that CMU get first refusal of the MPAN in the registration window
- Give CPs an initial 5WD at the start of the registration window to claim assets that they 'pre registered' to prevent an asset that is successfully preregistered being locked out if the CP choose not to register it to their CMU

Registration processes

Notifying conflicts

Where conflicts are identified in the registration process, who should be notified by the Settlement Body?

- Both CPs
- Just the second CP

Is it right that in the first instance, CPs should attempt to bilaterally resolve any conflicts

Where the consumer needs to be engaged, who should lead on this?

backstop

If Capacity Providers can't obtain a clear decision from the consumer over which provider they wish to use their energy flow in the CM, the process needs to include a backstop option:

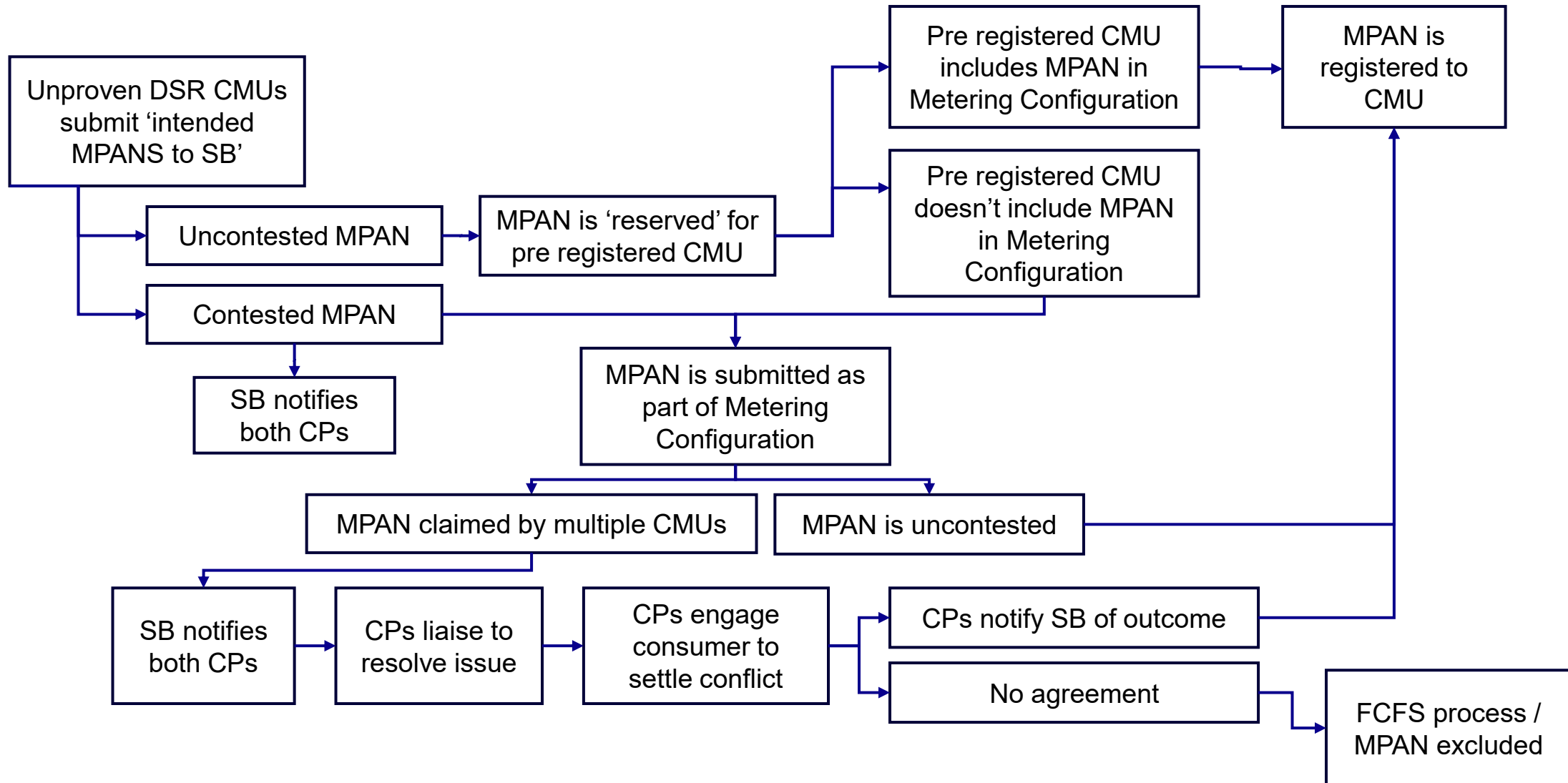
1. We use the FCFS approach as a last resort where CPs and their consumers have not been able to make a determination
2. If CPs cannot get a clear decision from the consumer, is there an argument the condition in Regulations 5:

having the right (whether by ownership or pursuant to contract notwithstanding that terms and conditions may apply to its exercise) exclusively to control all or part of the metered volume of any demand side response CMU component to provide demand side response when required to do so In that delivery year.

hasn't been satisfied by either competing CP.

However, would this allow a bad-actor to block other CPs assets by submitting assets on the last day of the registration window?

End-to-end diagram



Next steps

Next steps

Elexon will assess whether any Rules changes are needed to facilitate the outcome of today's discussions

Elexon we circulate a summary of the discussions at today's meeting

AOB and meeting close



Thank You