

Question Log



Department
of Energy &
Climate Change

Programme / Project Name			DECC EMR Workshops			
Programme / Project Manager			Stuart Cook			
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Issue Id.	Programme/ Project/ Workstream Affected	Document Point Ref	Question raised in Collaborative Development group	DECC has seen no evidence to suggest that this is a matter for concern for the design or operation of the mechanism	DECC has been aware of this for some time through its regular stakeholder engagement channels and has published its preferred approach to dealing with this matter. Further views are welcome in response to the October consultation on EMR implementation	DECC will consider this matter and will clarify how this be addressed before the end of collaborative development process
1	Handle a demand curve		To what extent can National Grid be transparent about the methodology which will be used to determine the demand curve?		x	
2	Handle a demand curve		How will demand side response be factored into the demand curve?		x	
3	Handle a demand curve		Will the methodology for determining the demand curve be based on the approach that Ofgem currently adopt? If not, could differences in the approach be highlighted? How will the possibility that Ofgem will publish a capacity assessment in the same year as publication of the initial demand curve be handled?	x		
4	Handle a demand curve		Is there scope for greater industry input to this process?			x
5	Handle a demand curve		What does DECC actually publish in terms of what NG knows regarding specific plant, and going in as price makers or price takers etc.? Industry concern regarding publication of commercially sensitive information, or information that might signal the potential closure of a plant. Further issue regarding publication of settlement data			x
6	Handle a demand curve		Need to understand end-to-end process timescales: Comment 1: Demand curve published in July. Will I need to say whether I'm price maker or taker before pre-qualification. Have to submit a qualification as to why a generator is a price maker, however, need to submit application form in August. Worry that insufficient time between process points Comment 2: Is there a risk that all companies take the price-maker position due to risks and timing of this process Comment 3: Timing of entire process needs to be sufficiently long and flexible such that there is no 'breach of human rights' Comment 4: National Grid could issue a 'shadow run' prior to the legislation taking effect. Demand curve more important than pre-qualification process in risk terms Comment 5: Time periods – can't procure new build in a year ahead auction. How is the set-aside volume determined and on what time periods? Separate out DECC forecasting periods compared with contract periods Comment 6: Risk will be priced into auction if timescales are insufficient		x comment 1 x comment 2 x comment 5 x comment 6	x comment 3 x comment 4

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7	Handle a pre- qualification		What is the definition of a CMU and how does it relate to the definition of a BMU? Comment 1: Definition should reflect decisions regarding: opt-in/out decisions; metering; station transformers Comment 2: currently sound like they could be different depending on who you are (plant, ind. site) and the point in time. Comment 3: Need to ensure definition works with metering definitions and metering Codes Comment 4: does the de-rating affect the definition of the CMU over time? E.g. if wanted to participate in additional auctions for any additional capacity does the CMU definition prevent this? Splitting of 1 unit between a number of agreements. Comment 5: Regarding "Handle a novation", this definition is key to determine how obligation can be taken on.			
8	Handle a pre- qualification		What is the timeline for appeals processes? What is the process for appeals? How in particular does the separate		x (covered in regs and condoc)	
9	Handle an auction		How is de-rating calculated, and what capacity definition is used? Comment 1: Noted that de-rating cannot occur outside of the range Comment 2: What rating is used in the auction if the rating figure is subject to dispute?			x
10	Handle an auction		If I have participated in the first round of the auction as an 'opt-in', then my price doesn't clear, what is my 'classification' following the auction			x
11	Handle an auction		Can you cancel an obligation if you lose an appeal? Comment 1: What options do you have to cancel your obligations?			x
12	De-rating DSR capacity before the auctions		Rules for de minimis capacity, combining DSR generation etc. Comment 1: Where you have aggregated dispatch (eg 10 x 2MW units) would you want to avoid 2MW de minimis rules as the existing structures in place support aggregate dispatch			
13	Handle a demand curve		How are transmission losses accounted for?	x		
14	Handle a demand curve		Market dynamics – are we sure the arrangements will work to encourage new plant		x	
15	Handle an auction		Is DECC's approach of prioritising and pushing through all eligibility-related appeals in time for auction (ahead of de-rating related appeals) feasible?			
16	Handle a demand curve	2	What data is industry expected to provide in the data gathering phase			x
17	Handle a demand curve	2	Should there be a clearly defined set of rules around the data-gathering process? And will they be in a similar format to the information that Ofgem requires for its capacity assessment			x
18	Handle a demand curve	3	The agreed format of the "Pass over" to be specified			x
19	Handle a demand curve	3	Guidance regarding data collection to be defined and provided to Industry			x
20	Handle a demand curve	4,5,7	There are places in the process where there is a feedback loop. Include on the process map how comments go back to DECC?	x		
21	Handle a demand curve	8	Request approval process to be defined.(point 8 of diagram)			x
22	Handle a demand curve	9	Resolution process needs to be defined			x
23	Handle a demand curve	10	What is actually published at the point of publishing the demand curve			x

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24	Handle an auction	1	Define 'Sufficiently Complete" with regard to the 'Handle a demand curve' reference point 11, and Handle an Auction ref point 1			x
25	Handle a demand curve	13	Industry concern regarding the potential volume of opt-outs.		x	
26	Handle a demand curve	13	What is the opt-out process? What is the de-rating process? Comment: Policy issue potentially around the opt-out volume being higher than potential capacity that could be attained or achieved in the 1-year auction.		x	
27	The flow of pre-qualifications	2	Auction guidelines and rules to be defined			x
28	The flow of pre-qualifications	3,4	Should DECC specify asset and corporate structure (example of BSC A signatories, noting that there are difficulties for new entries)? Relevant to registration windows Is this a 1-to-1 or 1-to-many company input (1 CMU for each generator in each generation unit?)		x (conduc to detail)	
29	The flow of pre-qualifications	3	As part of Register a CMU Process need to define change of contact details process (also relevant to "Handle a Prequalification) Question over whether data should automatically roll over or needs manual input		x (conduc to detail)	
30	The flow of pre-qualifications	7	Submitting CMU applications Issue around chasing and prompting those who don't upload mandatory/appropriate documents – does this go to the appeals process? Helpdesk to deal with queries?		x	
31	The flow of pre-qualifications	10	Regarding handling a pre-qualification RAD, how does data transfer happen?			x
32	The flow of pre-qualifications	16	Should the CMU publication process be removed/delayed until after the appeals process has completed?		x	
33	The flow of pre-qualifications	20	Regarding the appeals processes, What is the format of appeals documentation?	x		
34	Handle an auction		In due course, the auction process may be amended to allow for zonal auctions	n/a not a question		
35	Handle an auction		Will the demand curve be adjusted for DSR and, if so, in what circumstances?		x	
36	Handle an auction		Will the amount of capacity held over for the year-ahead auctions be adjusted to take account of the results of the pre-qualification process?			
37	Handle an auction	10	How long will the auction process last - one day, or up to a week? Comment 1: international experience suggests that a one-day process should be possible, but industry participants expressed concern that this might not allow sufficient time for sign-offs. More time might also be early-on, to allow participants to become familiar with the auction processes. Can an auction feasibly work in the course of a day? Even using automation it will 'get messy' Unfamiliarity will be an issue particularly in the first round			
38	Handle an auction		What mechanism will determine the size of price decrements ("tick size")? Will the size of decrements be fixed or dynamic?			
39	Handle an auction		To what extent will participants have options through the auction process?			
40	Handle an auction		Will there be separate auction trustees, auction monitors and auction auditors?			
41	Handle an auction		What information will price makers be required to submit in the "sealed envelopes"?			
42	Handle an auction	9	Should there be a mock auction? For example this could include imaginary portfolio/numbers but real CMUs			

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43	Handle an auction		How is it decided how many MW are procured in each auction round (both four years ahead and year-ahead)		x	
44	De-rating DSR capacity before the auctions		Is it only DSR who will provide a bond?		x	
45	Handle a pre- qualification		What is the baseline capacity used for de-rating?			x
46	Handle a pre- qualification		What options to industry have to cancel their obligation? Can it be cancelled if an appeal is lost?		x	
47	Handle a pre- qualification		What rating is used in the auction if the rating is disputed?		x (condoc to detail)	
48	Handle a pre- qualification		Clarity around credit ratings definitions and usage		x (condoc to detail)	
49	Handle an auction	5	Role of Auditor takes effect from when? Clarity around this role required			x
50	Handle an auction	6	Link to Issue ID 6. Timing of auctions to be ascertained. More time needed to understand the risks in order to avoid certain		x	
51	Handle an auction	17	Rules need to be defined for setting new prices in an auction where there has been insufficient capacity offered, and the auction has not		x	
52	Handle an auction	23	Auction summary: If an auction has failed, at whose discretion is it to label it a failure		x	
53	Handle a demand curve	2	Need to design and agree the process through which National Grid will gather data for and seek views on the assumptions which will underpin			x
54	Handle a demand curve	8	Need to define what analysis will be provided by National Grid for DECC to support the process for approving the demand curve.		x	
55	The flow of pre-qualifications	3	Which party has the obligation to register a CMU? Does the proposal that the obligation rests with the asset owner work in the context of		x	
56	The flow of pre-qualifications	5	Have we correctly defined the data which applications need to submit through the pre-qualification process?		x	
57	Handle a pre- qualification	2	Determine the format of the Bid Bond process and requirements.			
58	Handle a pre- qualification	9	Define the de-rating methodology.		x	
59	Handle an auction	4	Determine the format of the information pack which will be made available to participants in advance of an auction.			x
60	The flow of pre-qualifications	9	To what extent should de-rating take account of TEC constraints			x
61	The flow of pre-qualifications		What is any scope is there for a participant to amend their pre-qualification application during the process?			x
62	The flow of pre-qualifications		Is there any scope for a mass upload of data (as was carried out at the start of NETA)? Could National Grid pre-populate some of the data at the start f the process?			x
63	Handle a capacity provider		Seek clarification from Ofgem about the VOLL figure that Ofgem will use in cash-out mechanism		x	
64	De-rating DSR capacity before the auctions		De-rating expert group appeal mechanism		x	
65	Handle a capacity provider	3	Determine what DECC's 'proof' or check looks like to ensure that new build plant is on track and has achieved its milestone 12 months after the auction		x	

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66	Handle a capacity provider		Contractual commitments and DECC timelines of delivery of refurbished and new plant 2 years ahead of delivery year. Concerns from parties that this timescale may not be appropriate. Definition of refurbishment includes financial expenditure thresholds on a kW basis; it also needs to be for the purpose of reduction of carbon. There may be a critical threshold for carbon reduction. Industry considers that 2 years ahead is too long. Further question on how one plans refurbishment given potential existing commitments.		x	
67	Handle a capacity provider		Refurbishment and newbuild definitions over time to provide clarity to industry		x	
68	Handle a capacity provider	3 to 5	Industry asked what the appeal mechanism looks like for terminations. Information regarding timing etc. also needs to be clarified		x (conduc to detail)	
69	Handle a capacity provider	5,9	who is the settlement body/agent?		x (previously published an Expert Group paper on this)	
70	Handle a capacity provider		Policy decision to be taken on when you can/can't physically trade in respect of both first and further delivery years - currently dependent on what year as to what proportion of your capacity is allowed to trade		x	
71	Handle a capacity provider		Process to be developed which covers the transfer from ION to EON through commissioning		x	
72	Handle a capacity provider		Need to look at the equivalent of an ION for distribution connections			x
73	Handle a capacity provider	5	Question over level and type of posted collateral. DECC suggested that a collateral charge equivalent to 75% of the termination fee, which for a		x	
74	Handle a capacity provider		How does size of second termination fee feed back into auction process to ensure that a sufficient number of participants are participating in	x (it goes into the Consolidated fund)		
75	Handle a capacity provider		Once a generator has an obligation, they are never obliged to demonstrate that they are able to produce more than their de-rated	x		
76	Handle a capacity obligation	1	The legal and procedural processes regarding the auction instrument and capacity agreement need to be defined.		x	
77	Handle a capacity obligation	4	Which elements of the registry will be published? Who is procuring it/operates it/pays for it etc.?		x (all answered, registry contains all non-confidential info on CPs, name, CMU, term,	
78	Handle a capacity obligation	10	National Grid need to inform CP about timing of progress report regarding milestone plan (KPIs etc).		x	
79	Handle a capacity obligation	12, 14, 15	How is lack of accuracy determined with regards to progress report regarding CP's milestone plan? Mechanism needed to prevent CP's		x (regs will require accurate and timely submission)	
80	Handle a capacity obligation	15	What is the process for National Grid dealing with incorrect assertions?		x (regs will require accurate and timely submission)	
81	Handle a capacity obligation	6-15	What is national Grid's role in terms of their abilities to make decisions and determine what is an appropriate assertion etc.		x (regs will require accurate and timely submission)	
82	Handle a capacity obligation	6-15	What is National Grid judging against? National Grid are not the counterparty to the capacity mechanism so don't have a role to enter into contractual negotiations.		x (regs will require accurate and timely submission)	
83	Handle a capacity obligation	6-15	Change the diagram so that National Grid are able to review the CP's documentation for completeness, whether or not they submitted in time. Also, what ability does NG have to do spot checks at random times?		x (detailed in regs and conduc)	
84	Handle a capacity obligation	11	Milestone plan is submitted but exactly what should this plan be specifying?		x (regs will require accurate and timely submission)	
85	Handle a capacity obligation	13	what does 'handle' mean? Suggest that there are two things: 1. late with regard to milestones; 2. late with regard to submission of milestone reporting		x (detailed in regs and conduc)	

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86	Handle a capacity obligation	16	To determine whether National Grid are responsible for monitoring whether all CP's milestones have been achieved, or whether it is the responsibility of the CP to report this.		x	
87	Handle a capacity obligation	17	Timing differences between end of CO and ability to collect LC subsidy needs to be considered		x	
88	Handle a capacity obligation	4	Who is responsible for updating the registry?		x	
89	Handle a capacity obligation	16	Can a feedback loop be built in here		x	
90	Handle a capacity obligation		Clarify the relationship between de-rating and the capacity obligation. CP's may want to contract for less capacity obligations.		x	
91	Handle a capacity obligation	5	Payment notification information needs to be specified		x	
92	Handle a capacity provider	12	Process map to be updated to reflect most recent policy decisions.			x
93	Handle a capacity obligation		If a CP converts a coal plant to a greener fuel at the expense of overall plant capacity, what happens where the CP is now only able to produce less than the obligated capacity? Is the CP able to 'top up' the difference using other mechanisms.		x	
94	De-rating DSR capacity before the auctions		De-rating considerations associated with subsequent conversion - how will these be handled?			
95	Handle a novation		This process map should be more appropriately titled as "Handling a physical trade"	x		
96	Handle a novation		What does notification window need to be?		x	
97	Handle a novation	5-11	Subsume separate notification activity - joint submission? Should parties be able to jointly submit. Steps 5-11 can be included before step 2 by the two parties confirming and agreeing the trade, then jointly submitting to National Grid.			x
98	Handle a novation	23	Should the notification process be automated? If gate closure (gate closure assumes pre-qualification was successful) is less than 4 hours it will impact on physical trading.		x	
99	Handle a novation		What happens if a novation is rejected? There is a need to build in an appeals process if a novation is rejected incorrectly. Industry-led disputes committee to resolve disputes/hear appeals?		x	
100	Handle a novation		Need to consider how trade affects caps including at the portfolio level.			x
101	Handle a novation		To what extent is a generator held whole in event of being constrained off. How can a consistent treatment be achieved between new plant with TEC less than CEC, and existing plant which is constrained as a result of eg weather-related events.			x
102	Handle a novation		Can you pre-determine eligibility? - clarify		x	
103	Handle a novation		Where are financial trades captured? Financial trades are only known by the parties involved, as it is not relevant to National Grid. Should there be a publically available list of these financial trades?		x	
104	Handle a novation		Consistency required around names of bodies involved with each process map	x		
105	Handle a novation		Disconnection and bid-off need equivalent treatment		x	
106	Handle a novation	22	The registry needs to be defined in terms of component parts		x	

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107	Handle a novation		Market issue - Trading through common place (neutral) could be beneficial to industry, as it will allow more participants. Industry considered that this should be looked at from a policy perspective. The market (and not DECC) should decide on which platform a winner should be decided.		x	
108	Handle a capability test		Need to consider interaction between balancing service and performance tests		x	
109	Handle a capability test		Need to determine how many periods are required for the test (10?)		x	
110	Handle a capability test	3	The 6 hour window before testing (irrespective of size/type of plant) was identified as being impractical by participants. Industry suggest that it needs to be based on a plant's dynamic parameters which a plant submits (ramp rates, min. on times etc.) otherwise there is a danger that plants might choose to appear "unavailable".		x	
111	Handle a capability test	2 - 3	What is CP's testing obligation if CP have traded out financially or physically. Initial policy review is that industry participants won't be tested if they have traded out.		x	
112	Handle a capability test	11	Need to determine what the level of payment reduction will be if CP does not meet their derated level. The rule for determining payment is to be defined, for example could it be dependent on how far away CP were from reaching their derated capacity?			x
113	Handle a capability test		Should testing reflect the way that e.g. ambient temperature affects station output.			x
114	Handle a capability test		CPs must be able to prove that they are able to deliver the maximum volume of their derated capacity. Industry participants considered that tests might be better focused on a load following basis rather than maximum. (In the summer demand won't be there to reduce through demand side response).		x	
115	Handle a capability test	2	In the situation where a CP is unable to meet derated capacity requirements what mechanism exists, either through this process or another process, to agree that the maximum capacity actually achieved is the appropriate test capacity. Should there be merit appeals on de-rating?		x	
116	Handle a capability test		Does the testing regime undermine the prospects of financial trading?		x	
117	Handle a capability test		What happens if only part of your plant was operational - will that year be used for pre-qualification testing. Or will years only be counted if the plant was fully operational?		x	
118	Handle a capability test	1 - 2	If CP can demonstrate derated capacity before spot test happens then requirement for spot test should drop away.		x	
119	Handle a change to the rules	1,33, 35, 23, 27	What are the routes by which industry and other parties can propose a change to the rules or regulations? Suggest that the process map is revised to show the different entry points and that a proposed change to the rules or regulations may be suggested by anyone			x
120	Handle a change to the rules	36	Industry suggested a permanent panel should be in place to support in the initial assessment (and subsequent stages of the change process)		x	
121	Handle a change to the rules	56	Market participants are not part of Ofgem and thus this point on the process map should sit outside of Ofgem's remit			x
122	Handle a change to the rules	3	Should the rule/reg change process mirror code processes such as CUSC, as there are potential downsides to only allowing for Ofgem to administer the rule/regulation change process? Also helpful to point to industry how frequently changes to the rules and regulations might occur.		x	

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123	Handle a change to the rules	33	Is point 35 the only place to enter a proposal for rule changes, ie is point 33 redundant in which case it should be removed from the map?			x
124	Handle a change to the rules	34, 37	Concern raised regarding the inability to appeal to Ofgem regarding decisions whether to take proposed changes forward other than through Judicial Review. Policy decision to be taken as to whether additional appeals required		x	
125	Handle a change to the rules	40	Does the consequential licence change then trigger a pre-existing licence change process?			x
126	Handle a change to the rules	15, 16	change wording to 'Will SoS want to change the Rules'? Can criteria for situations for what powers and circumstances SoS would want to change the rules be developed and shared with industry. Refine process map.			x
127	Handle a change to the rules	8,36	From point 8 it makes sense for point 8 to link to an earlier point in the review such as point 36			x
128	Handle a change to the rules	14, 15	At this point, DECC should consult with Ofgem over potential consequential rule changes. Additional decision box with optionality for a yes/no decision for point 14 separate to point 15			x
129	Handle a change to the rules	44	Participants concerned that if an expert panel was not required, then industry would not have an opportunity to input. Further, there is little opportunity for industry to appeal the decision if not involved other than through Judicial Review.		x	
130	Handle a change to the rules	32, 35	Link point 32 to point 35			x
131	Handle a change to the rules	35	Further clarification and finalisation required as to the role, aims and objectives of the Rule Administration		x	
132	Handle a change to the rules	rulebook and regulations	Industry participants commented as to whether regulations and rules should each have their own change processes within each document			x
133	Handle an auction		When the auction occurs on a year ahead basis, does DECC regularly consider whether to also hold a 4 year ahead auction? Would this be			
134	Handle a 5 year statutory review	3	Full list of documents that DECC/NG require of industry participants should be set out in order for industry to plan			x
135	Handle an annual report	5,6	Ofgem would be expected to gather views from stakeholders as to how they have performed during the year - additional step required on the process map between the current step 5 and step 6			x
136	Handle an annual report	8	DECC to take a decision as to whether a market monitor is required and to provide a report after the auction each year in order to feed in to Ofgem's annual report. NG would appoint a market monitor to report on the auction.			x
137	Handle an annual report	8	contribution of information from NG to Ofgem to be defined			x
138	Handle an annual report	10	Timing of this step to be defined. Issue further detail on the timing of the process to provide clarity to industry participants			x
139	Handle an annual report		Consistency regarding naming conventions (Delivery Body v NG etc.) to be considered			x
140	Handle a policy review	Ofgem + National Grid'	The box entitled 'Ofgem and National Grid' should just read 'Ofgem'			x
141	Handle an auction		Are VoLL and CONE set out in the regs or rules? Do you change the reliability standard in this case? Clarity over the relationship between VoLL and CONE required.			x
142	Handle a 5 year statutory review		Industry need a timeline to see where publications will be made by parties so that industry has time to respond with internal decisions etc. in advance of pre-qualification			x

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143	Handle bonus and penalties		Group discussed penalty impacts of CMU producing over its derated capacity in advance of CMW. For example, if derated to 50%, and operating at 100% beforehand, and the operator drops to 75%, there is a penalty liable. The obligation is the FPN when the notice is given, after 4 hours from stress event warning. Don't want system to deteriorate just after capacity market warning. For embedded plant without an FPN, an FPN equivalent will be estimated.		x	
144	Handle bonus and penalties		Relationship between CMU penalties and soft and hard caps which are portfolio caps which will need to be clearly specified. Particularly around netting off between the two.		x	
145	Handle bonus and penalties		If I am a generator where part of the market rules have been suspended, what happens with respect to the capacity mechanism in that region?		x	
146	Handle the Capacity Market Payment Obligations		Want to ensure no contradiction between NG instructions and DNO transmission/distribution operator instructions. Want to ensure no conflict of incentive in these instructions as compared to capacity market			x
147	Handle the Capacity Market Payment Obligations		Hypothetical events such as a generator tripping during a stress event, leading to additional stress captured? What are the penalties involved in more complex scenarios? Also particular issues around CCGTs at a local level ramping up at particular rates at particular times of year		x	
148	Handle the Capacity Market Payment Obligations		How is the end of a stress event notified?		x	
149	Handle the Capacity Market Payment Obligations		To determine market share, a methodology needs to be published. Current view is that NG forecast system demand. At the appropriate point, suppliers provide their forecast which would be used to determine market share. Suggestion to use ROCs market share data. Settlement runs as per existing BSC timetable. Concern raised by industry that if a supplier has good DSR, will avoid some of the charge. You won't know until three years later what the actual charge was. DECC commented that there would be incentives on suppliers to forecast accurately. What would this incentivisation be? Particular concerns around it being peak demand, and underreporting. Also that DSR is being paid twice for the same thing through CM and through DSR.		x	x
150	Handle the Capacity Market Payment Obligations		Query on how the methodology for pass-through to customers occurs. Firstly on whether it's £ or £/MWh. DECC current position is leaving it to suppliers to charge to customers the rate. Paying a tax as a supplier - so is likely that there may be specific rules around how suppliers may pass through the costs. Industry would like clarity around any rules regarding pass through, and recommend reviewing whether payment is on a £ or £/MWh basis.	x		
151	Handle the Capacity Market Payment Obligations		DECC advise that it will be a regulation to provide an appropriate forecast. Industry suggests that it could be more powerful to apply as a licence condition.	x		
152	Handle the Capacity Market Payment Obligations		How are new entrants accounted for after the forecast charges are worked out? Eg if enter market on 1 October, won't know until end of February as to whether you have charges. Avoided charge until that point. From a point of competition and risk this could be a large issue.		x	

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153	De-rating DSR capacity before the auctions		Could be additional clarification around payment shaping and smoothing as industry participants currently unclear. Particularly around DSR and how the cashflow of this works in terms of charging.		x	
154	Handle the Capacity Market Payment Obligations		Concern about the level of over-delivery payments that could be liable by suppliers, particularly given penalties aren't deducted. This could be a working capital issue particularly for small suppliers. Given the flow between generators and suppliers (fund overdelivery payments to capacity providers by first getting funds from suppliers. Also penalties provide a stream of cash. Generators make payments in arrears.) Propose to develop some 'journeys' to show scenarios with industry volunteers		x	
155	Handle the Capacity Market Payment Obligations		Concern about where generators go out of business. No 'generator of last resort' concept so there is a shortfall in cash. There is also an associated issue of credit security, particularly in an event where all participants overdeliver and noone is penalised.		x	
156	Handle the Capacity Market Payment Obligations		currently no dispute option on this process map, where for example a bill is received at the incorrect expected value. DECC expects that disputes around payment would broadly sit in three categories: 1 .BSC data incorrect, which would be addressed at BSC. 2. Dispute against data provided by SO in terms of system rules, which would go to Ofgem. 3. Settlement agent has incorrectly set out something, this would go to the Settlement Body or be raised to JR. Industry considered that if this is a tax would issues be covered off in accordance with HMRC requirements/legislation?		x	
157	Handle a credit requirement on a supplier		If there are changes in market share, then under and over-recovery will be particularly important. This is of particular regard to credit requirements, for example that suppliers are underprovided as they have underforecast. This could be of particular concern in the case of default. Industry are concerned by the impact of other suppliers on those suppliers' actions, particularly in circumstances such as smart metering, where actuals are known for a proportion of the suppliers population during the year.		x	x
158	Handle a credit requirement on a supplier		Compare monthly and daily impact of credit settlement as industry concerned about interest requirement and impact on working capital position. Industry considers BSC already sets out requirements on a daily basis. Alternatively, existing power billing is approx 22/23 of each month, could be more consistent with current rules.		x	
159	Handle a credit requirement on a supplier	9	Concern that the suspension of a supplier, and the breaching of the supply licence is far too onerous a penalty as a result of missing a month on month payment. A softer option is required. Further, industry participants do not consider that they should suppliers bear costs of failure that they have no influence over. The BSC current situation, for example, has sufficient funding in place such that were SOLR arrangements are implemented, mutualisation is not required.		x	
160	Handle a credit requirement on a supplier	12	update process map to show that suppliers are repaid		x	

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161	Handle a credit requirement on a supplier		Query relating to how issues between years are accounted for. There are a number of factors such as levy rates which in any given year are related to different years. Please clarify all details of what factors are relevant for that year and for subsequent/previous years. Note that there is some crossover with decisions from CfD. Query over how reconciliation payments at each invoicing stage occurs and whether this is quite complex. Reconciling actual peak demand market share and financials each month.		x	
162	Handle a billing cycle		Concern from industry regarding the central netting off of over-delivery payments which disadvantages suppliers as compared to generators. From a policy perspective drawn up this way in order to encourage secondary trading. Industry considers that transparency of cashflows relating to under and over delivery should be separate, rather than netting of and creating a monthly cash call on suppliers. Further, this is on a month by month basis. This could be minimised by having a very low penalty rate.		x	
163	Handle a billing cycle		Can do a financial trade with any party, but only parties with a CA will be hedged in terms of overdelivery payments - noted by industry participants	x		
164	Handle a billing cycle		Clarification sought over the circumstances and calculation for over-delivery payments (query related to portfolio load following obligation in particular, with regard to the warning process as well as the cashflow process)		x	
165	Handle a billing cycle		Participants considered the situation that may arise where there is overdelivery but still a short-fall in funding. Complex design concerns. DECC response that without overdelivery financial trading is less likely to happen.		x	
166	Handle a CM warning notification		Issue discussed that for any given settlement period, stress event warnings should only take place between T-8 hours and T-4 hours, as the current system sufficiently covers other time periods. Given the penalty regime, if warning too long a time in advance of a settlement period, a revenue maximising strategy would be for participants to reduce production so that they can ramp up during the period. Additional comment that plant where there are multiple units of which some are offline, participants might be incentivised to make particular actions. Concern that stress event notifications will occur too frequently.		x	
167	Handle a CM warning notification		Definition of MEL (maximum export limit) should be clarified in the context of the capacity market		x	
168	Handle a CM warning notification		On change control, want to be able to change policy relatively quickly given the potential for industry participants to behave in unexpected ways. If a BSC type change control process is used, then urgent changes can be implemented in a matter of days, rather than potential months if DECC ministerial decision is required			x
169	Handle a CM warning notification		Need to confirm what the definition of the stress event notification in relation to each settlement period. Participants suggest that the stress event would relate to the current settlement period. Suggest at washup go through example daily timelines of how in practice each stress event notification process work occur.		x	
170	Handle a CM warning notification	7	Definition of a baseline PN - will it be 4 hours before, or declared as the time when the warning was issued?		x	

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171	Handle a CM warning notification		Planned v actual DSR delivery - distinction is important. whichever calculation used for penalty calculations will inevitably have some level of inaccuracy. Industry note that they would try to overdeliver in order to avoid penalties no matter which DSR calculation used.		x	
172	Handle a CM warning notification		How will NG signal to opt-out plant (plant that would be eligible for CM but has chosen not to participate) various ongoing updates? Participants raised particular concern where opt-out plant trips, increasing the load following obligation of plant that has opted-in as demand is net of opt-out plant. NG notes that most information is available it is just a matter of publication and formatting.		x	
173	Handle a CM warning notification		How NG publishes the warnings should be defined and agreed. Industry considered a multi-route approach should be taken, with potential for confirmation of receipt by participants. Should also tie in with Ofgem Cash-out SCR methods. Suggested creating some 'day in the life' scenarios to set out dynamic system parameters, and how CM, National Grid Code rules and Ofgem Cash out SCR rules will interact.		x	
174	Handle a CM warning notification		Discussion around scenarios for triggering a stress event where payments could apply, and whether it would be possible for NG to declare a stress event that is subsequently determined to not be a CM stress event, with potential for industry participants to take actions to avoid penalties and overdeliver, but then it is determined after the event that it was as'n't actually a stress event. What retrospectivity in decisions as to the status of stress events is possible?			x
175	Handle a CM warning notification	4,8,9,15,18	Settlement data access query - how, what, who has access etc.		x	
176	Handle a CM warning notification		Consider possibility of rolling notification periods to remove requirement of cancellation in the case where an ongoing stress event is occurring. Query over whether the market restoration signal should be more mechanistic (perhaps similar to NISM) than the current arrangement for it to reset at midnight.		x	
177	Handle a CM warning notification	21	Notice of closure should also notify CPs			
178	Handle bonus and penalties		Issue raised regarding the rationale regarding portfolio caps being applied at a portfolio level. Noted that it is to be proposed as is in the condoc, however industry participants noted the example where portfolios could have vastly differing penalty impacts.		x	
179	Handle bonus and penalties		DECC to confirm the parameters over which exposures would be in order to hit the penalty cap, with examples. Under the circumstances of one unit stopping working in particular, with other units then supplying at higher levels, how do overcapacity payments work?		x	
180	Handle bonus and penalties		Unintended consequences of cash out compared to CM. Incentives driven by cash out, but there are clear linkages, where operators need to decide how to operate plant under a range of complex decision trees (spill v sell). Makes it more expensive for a CM unit to sell than a non-CMU as there are more complex choices in deciding to be a CMU. The level of complexity introduced to trading decisions as a result of these arrangements should be considered by policy-makers.		x	

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181	Handle bonus and penalties		The VoLL figures for cash out compared with the CM drive incentives. Can the parameters such as VoLL be changed between the period prior to the auction when participants price their risk and delivery? Risk regarding finance and acceptability to banks if the parameters of the CA can change.		x	
182	Handle bonus and penalties		Penalty rates further discussed in terms of a barrier to entry. Penalty is capped at annual payment. DECC commented on expert paper that will shortly be published to look at a range of penalty rates as compared with penalty caps and their impacts.		x	
183	Handle bonus and penalties		With particular regard to 10 year contracts, the market may not have an incentive to deliver while that single player does. Particular concerns raised by industry that where it is a new entrant who is not part of a portfolio, then industry participants are concerned about a lack of cohesiveness for this plant compared to the rest of the market.		x	
184	Handle bonus and penalties	5,6	Change process map naming convention to change 'lead time' to 'CMW notification period'		x	
185	Handle bonus and penalties	7	Should the adjusted load following obligation calculation be ex post or calculated in advance? Note that this is a query that has been raised in expert groups. A number of scenarios were discussed where overall capacity was turned up or down and the impact on obligations. Question as to whether non-CM capacity should be included or not within the overall system calculations. If the aim is to protect consumers, then ok if a little excess capacity is on the system.		x	
186	Handle bonus and penalties		FPN position would reflect a number of parameters, but industry raised particular concern regarding limitations on ability to run. Where the generator is unable to run as a result of circumstances that they are unable to do anything about, the penalties would not be liable etc.		x	
187	Handle bonus and penalties		Concerns from industry where CMW is posted, but no stress event occurs; as a rational response majority of industry participants will turn up load in order to avoid penalties. Likelihood that NGC will be turning down a lot of plant, with associated cost. Ratio of CMWs to stress events may be high.		x	
188	Handle bonus and penalties		Day in the life of a stress event and warning scenarios should be developed, particularly around where PNs are feasible and deliverable under a range of stress situations, and the impact on generators of their load following obligations. May be creating a set of penalties where it is unfeasible to trade despite signals to dispatch		x	
189	Handle bonus and penalties		Query raised regarding the gas system in emergency conditions and the impact of force majeure on the electricity system. If an FM event existing alongside a system stress event, there could be a 'slippery slope' of FM exceptions so the DECC policy decision to date has been to exclude. Industry recommend that a clear definition of a force majeure event is published by DECC.		x	

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190	Handle bonus and penalties		BMUs face particular challenges in terms of traceability of generation at sites including BMUs and how they are accounted for. For example where a trading site has a production BMU of 1000MW and a demand BMU importing 100MW, then the FPN and export metering for the production BMU would be 1000MW, however credited energy TEC and meter aggregation rules for settlement would be based on the net 900MW. Clarification as to how the trading sites are treated are needed. Where does the obligation sit? on the 900MW? The de-rated capacity shouldn't preclude the possible range of output. Concern that there is no consistency across the CMW notification and the post 4 hour period. Additional comment raised regarding whether it ramps up or down in the PN period what is the impact?			x
191	Handle bonus and penalties		Request by participants for DECC to make and publish some examples of how calculations for the soft cap occur, for both individual CMUs and for portfolios. One scenario request for z value changing between auctions.		x	
192	Handle bonus and penalties		If z factor will change after auction, there are significant impacts on portfolios. Please confirm.		x	
193	Handle bonus and penalties	11	What is the mechanism for disputes on this process map? Query as to whether the current policy of dispute resolution regarding settlement - a more informal route prior to the formal dispute process. Would prefer to have an initial process with timescales for responses for queries regarding bills etc.		x	
194	Handle bonus and penalties		For CMU definition whereFor each category where generators optout and either want to close or don't want to be operational in that delivery year,DECC considered that an explanation is required by the generator. Participants did not consider that this commercial informaiton was appropriate to be shared		x	
195	WASH UP: Qualification & auction process		Participants considered that the expert group paper did not sufficiently clarify the physical definition of a CMU. For example, Is the export capacity unit gross or net of station load? Plus addition issues for DSR			
196	WASH UP: Qualification & auction process		Regarding definition of a CMU: if you have a CCGT with multiple gas turbines and steam. May choose to operate only one or some of the gas turbines. This is difficult to operate under the current definition of a CMU.			
197	WASH UP: Qualification & auction process		Regarding portfolios, participants considered that rules used in CUSC could be applied to the CMU when considered ultimate parent company and legal and licence responsibilities and obligations. There are a number of associated issues around who the responsible parent company is - suggestions that this may be different for different things, particularly where regulatory powers are requiring a UK-based business to be responsible.			
198	WASH UP: Qualification & auction process		In determining the demand curve, participants thought that a worked example would be helpful			
199	WASH UP: Qualification & auction process		During auction – participants raised that NG would have limited information has to how much to reduce prices each round when reducing prices during the auction, as they are 'blind' to companies exit price until after they have set a lower price than the exit price. This might affect the overall capacity level offered if the curve is steep.			

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200	WASH UP: Qualification & auction process		If you are within the BSC, you get VOLL - cash out penalty. If you are outside, just VOLL. Trading dynamic/incentives are different are different depending on situation. Participants considered that the incentives are such that generators would only result in trades within each 'side', rather than across (between inside and outside the BM). So trading is more limited than participants anticipated.			
201	WASH UP: Qualification & auction process		Rules around force majeure and failure in the transmission/distribution networks are currently complex and will require a lot of definition by NG. Rules to be defined			
202	WASH UP: Qualification & auction process		Under current policy opted out parties cannot participate in secondary physical trading. Industry participants consider that it could be useful for trading across all parties			
203	WASH UP: Qualification & auction process		A statement to clarify penalty cap obligations would be helpful. Cap would be based on the clearing price at the auction.			
204	WASH UP: Qualification & auction process		Spot testing is not looking at availability, it is confirming that a CP has the capability to deliver. NG consider that testing intent is to give comfort that in years where there are no stress events. Industry concern that if testing is not at maximum capacity, then there is potential for DECC to change derating based on that test. Should either test at max derating or not threaten to change derating based on test			
205	WASH UP: Qualification & auction process		What are the conditions for sale of a CMU before the auction?			
206	WASH UP: Qualification & auction process		If an ownership change halfway through a delivery year, how is the cap (calculated based on ownership) adjusted? There would be a requirement to notify DECC, and the cap would have to be updated. If the cap has already been met but then the asset is sold to a larger portfolio does the cap increase?			
207	WASH UP: Qualification & auction process		How much capacity is to be held aside for the T-1 auction. DECC are still to work the figure out (possibly 2GW – too low?). If it is 2GW then industry participants considered that this incurs significant market risk			
208	WASH UP: Qualification & auction process		In terms of secondary trading, can a single party trade with multiple other parties?			
209	WASH UP: Qualification & auction process		Industry considered a strong need for the ability to run prequalification and auction training 'sand-pits' for industry in advance of the first			
210	DSR		Binary decision for participants to bid in either T-4 auction or T-1. More certainty for both types of participants if the Transitional Arrangement funding is available. If you are participating in the 2014 auction, DECC assumes that the DSR is sufficiently sophisticated that it would not need TA payments. Industry considered that this would not be appropriate as the 2 year payments would allow T-4 participants to grow during this time.			x
211	DSR		Query as to how we define nameplate capacity for DSR.		x (conduc to detail)	
212	DSR		NG sought feedback from industry as to whether their de-rating figure should be based on availability or performance. The issue for individual parties is that they need their individual processes to be accounted for in the obligation requirements, rather than taking an average or portfolio approach.		Issue 2 - individual -vs - average performance	Issue 1 - information to create DSR de-rating figure

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213	DSR		Using 2MW as a maximum size for DSR participants raised some concern for the small level of this, given the 2MW de minimis in generation. DECC responded with gaming issues, and NG asked the floor what level would be appropriate. Request from industry to make the maximum the same as the DSR licence limit.			x
214	DSR		Query from participants as to whether committed STOR would be a preferred measure of availability? Or to base DSR participation on other worldwide examples?			x as above in 212
215	DSR		Participants considered that DSR testing should be on the same basis as generation. Industry preferred it to be as per load following obligation		x (conduc to detail)	
216	DSR prequalification		What is the prequalification requirement for embedded generators that are connected at DNO level that would need a connection upgrade in order to participate in the market? What consideration is given for this as part of DSR in terms of offsets that are given to generators? It should be comparable.			
217	DSR prequalification		At the auction, what level of capacity you can bid in relative to the CMU capacity? DSR participants would potentially like to be able to bid less capacity than CMU requirement from pre-qualification.			
218	DSR prequalification		Consideration should be given to the penalty regime for generators and equivalent rules should be in place for DSR - ie if a DSR prequalifies and opts in but does not bid at auction, are the penalties equivalent?			x
219	DSR prequalification		Concern from generators that DSR is 'self-derating' after prequalification and after the Capacity Agreement has been signed based on a CMU with particular technical characteristics is not in keeping with the principles of the CM and balanced risks between generators and DSR. While the bid bond is an additional 'extra' to get additional certainty in delivery, and to not inflate what they are able to deliver.			
220	DSR prequalification		The Pre-qualification process map shared at the workshop included a matrix setting out the criteria for each application type. Additional			x
221	Handle a bid bond		If not entering the auction, a trigger for returning bid bond required		x	
222	Handle a bid bond		Can a bond be renewable (e.g. every 6 months) as opposed to full period? The former will be the cheaper to secure.			x
223	Handle a bid bond		who do the bid bonds go to if they are sacrificed? Assumed some particular circumstances related to tax status however industry would prefer clarity		x	
224	Handle a bid bond		Clarity required on partial delivery - ie if DSR partially deliver, be partially funded, should the obligation also be scaled down, and should the proportion of bid bond received change. Generators note that to be equivalent to the bid bond side, equivalent thresholds should be encountered (if at least 80% created, gets 100% bid bond). The goal should be to avoid mismatches across participant types.			x
225	DSR prequalification		testing requirements and parameters on DSR to be confirmed given timeconsuming nature of testing small units			x

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226	Metering arrangements		There are two routes for CM metering data to go. In some circumstances the data provider can take that data, however, may not always occur. Where data cannot go through the settlement process, the data collector, the MoP and other parties will need alternatives.		x	
227	Handle bonus and penalties		Many industrial and commercial customers see imbalance directly (dependent on contract) through cash out. This may change and has impacts on the penalty regime as CM develops. Given sufficient notice, the supplier can include it within contracts.			
228	Metering arrangements		Reconciliation timing was a concern for industry participants as as they understand it at present reconciliation must occur within year for tax purposes.			x
229	Handle bonus and penalties		If the stress event is only part of a half hour, does it apply for the whole of that half hour? If not, how does half hourly data from sites become more granular to apply it to that stress event period?			
230	Metering arrangements		Industry set out the need for DECC, NG and Elexon to look at individual sites to understand the differences between the various meter site types		x	
231	Metering arrangements		Query as to whether there is a de minimis for BMUs? Industry considered that provisions should be included to ensure that the MPANs attached to that BMU were the correct MPANs. Currently there is nothing stopping a supplier from splitting MPANs into different buckets.		x	
232	Metering arrangements		Industry noted CUSC and grid code metering methods and limits. Other participants considered that different meter types should not be mixed. For specific isolated generation, using the example of ROCs, additional meters could be included in order to measure those specific points.		x	
233	Metering arrangements		There are consistency issues across meters where some meter data might go to Elexon while other data goes to other parties. Therefore is may become complex where multiple parties need to be consulted in order to get full data for a site.		x	
234	Metering arrangements		Issue relating to one year contracts was raised, as all costs would have to be recouped within that year. This would impact costs. There was a wider point that DSR and generator mapping should be undertaken to align them.			
235	DSR		Are the portfolio rules applying to both DSR and generation?		x	
236	Baseline DSR within the delivery year to verify delivery		Concern regarding mismatch of Baseline being a rolling continuous measure, that the baseline would not capture a change in capacity availability. Noted that spot testing is on an ex-ante basis for DSR.		x	
237	Baseline DSR within the delivery year to verify delivery		The obligation is load following. Industry need to manage load following obligation with seasonality. The year ahead adjustment was brought in to help manage changes. There are two reasons for the current year approach: too costly to look at individual contracts; goes back a year as demand can change significantly during shoulder months. The baseline attempts to capture equivalent days. Participants concerned that last year has little relevance, although others considered average representative samples are important. While prior year may be relevant to temperature, it may not be relevant to the physical/contractual construction of the DSR. EDR comparisons drawn.			x