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| <h1>Proposal for a Capacity Market Rules Change</h1> | |  <p>Making a positive difference for energy consumers</p> <p>Reference number (to be completed by Ofgem): CP363</p> |
| Name of Organisation(s) / individual(s): Flexible Generation Group | Date Submitted: 21 April 2021 | |
| Type of Change: <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Addition <input type="checkbox"/> Revoke <input type="checkbox"/> Substitution | If applicable, whether you are aware of an alternative proposal already submitted which this proposal relates to: No | |
| <p>Proposal summary (short summary, suitable for published description on our website)</p> <p>To provide a mechanism for capacity providers to manage their CMUs via one login to the EMR Delivery Body portal.</p> | | |
| <p>What the proposal relates to and if applicable, what current provision of Rules the proposal relates to (please state provision number):</p> <p>Currently a party that owns a number of CMUs under different SPVs needs to use separate logins to manage their CMUs as each main company in the portal requires a separate login. The proposal provides two options to allow parties to effectively manage their CMUs with one login.</p> <p>Option A ('individual logins'): EMR portal individual logins to allow access to all companies and CMUs to which the individual has been granted 'user rights'. When the user logs in to the portal all companies (main and sub) that the login has been granted will be visible and will be manageable from the single login.</p> <p>Option B ('CM management company'): CM company Directors will be able to nominate another Main company already registered on the EMR Delivery Body Portal to be a 'CM management company'. This will mean:</p> <ul style="list-style-type: none"> • All users of the CM management company will automatically be granted equivalent user access to all 'managed' companies e.g. a deputy main admin of the CM management company will be a deputy main admin of each 'managed' company • All companies and CMUs managed by the CM management company will be visible and will be manageable from the CM management company login. • Company specific logins will still grant access to each individual 'managed' company. <p>It is important to note that under this proposal:</p> <ul style="list-style-type: none"> • The Capacity Provider and/or Applicant is unchanged. The proposal merely addresses efficient administration of CMUs. • The granting of 'CM management company' status in respect of any EMR portal Company can be reversed at any time by the Directors of the 'managed' company. | | |

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| <p>Description of the issue that the change proposal seeks to address:</p> <p>A lot of parties now own and control a number of CMUs under different SPVs. These companies are often related, most commonly sharing an ultimate parent company. However, for commercial and practical reasons (due to the complexity of financing and ownership structures) these companies are often not structured as main and sub-companies on the EMR Delivery Body Portal. This means that separate logins are required for management of each company (SPV) and its CMUs. This makes management of CMUs very slow and therefore expensive, with companies wanting to look at the details of one SPV's CMU and then another having to log in and out each time, taking all day to review a few CMUs when the portal is busy. This proposal would allow a party to manage its CMUs via one login to the EMR Delivery Body Portal.</p> |
| <p>If applicable, please state the proposed revised drafting (<i>please highlight the change</i>):</p> <p>Insertion of new Rule 1.7 'EMR Portal Access' setting out (as appropriate), for the avoidance of doubt that access to the portal will be organised on the basis set out above. If required a new Exhibit to the CM Rules ('CM management company nomination') may be added to the Rules.</p> |
| <p>Analysis and evidence on the impact on industry and/or consumers including any risks to note when making the revision - including, any potential implications for industry codes:</p> <p>With the growth in smaller parties with company structure that have multiple SPVs owning the majority of CMUs, there needs to be a better way to manage these CMUs within the CM structure. The time taken to log in and out of these relevant CMUs, to be unable to see all CMAs in one area, etc. makes it far more difficult, costly and time consuming to manage. For example we estimate that going between logins at busy times takes approx. 10 minutes, so adding significant manpower costs to businesses such as ours. We would like to believe that a new Portal will be quicker, but it would still be quicker to not have to login and out for administering CMUs.</p> <p>We see no risks associated with the proposal. There will be no change in the effective control of companies, the proposal merely seeks to increase the efficiency of accessing the DB's CM Portal for the purposes of managing CMUs.</p> |
| <p>Details of Proposer (<i>please include name, telephone number, email and organisation</i>):</p> <p>Mark Draper, Flexible Generation Group, mdraper@peakgen.com, 01926 336127</p> |