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Sent by email to: EMR_CMRules@ofgem.gov.uk

Dear Sohail,

Consultation on Capacity Market Rule amendments (Evergreen, CMR and Applicant Notice)

We support the concept of evergreen prequalification and we welcome improvements on reducing burden on participants and improving transparency in the Capacity Market.

As stated in previous responses, we continue to believe that the Directors signatures are onerous. Ofgem should accept signatures from people in the company that have delegated authority, rather than requiring it to be a Director's signature.

Yours sincerely,

Jack Presley Abbott
Centrica Regulatory Affairs & Policy

Appendix – responses to consultation questions

2. Evergreen Prequalification

Question 1: Do you agree with our proposed Rule amendments to facilitate the implementation of reusing Exhibits and other information?

We support that evergreen prequalification will be facilitated by allowing applicants to re-use exhibits in subsequent prequalification applications.

In the consultation, Ofgem refer to 'Other information'. Ofgem must clarify what would be captured under this. Information to evidence connection arrangements, such as private network letters should not be included.

We do not support the proposal in 2.12 for a 4-year time limit for exhibits to be re-used. There is no rationale from Ofgem for this specific timescale and for projects there is information that will not change and therefore will far exceed the proposed time limit. The onus is on the applicant to ensure the information is still accurate, rather than Ofgem imposing an arbitrary time limit.

We support the proposal in 2.16 to introduce a tick box and believe this should be considered further.

As covered in 2.21, we strongly believe that allowing employees with Delegated Authority to be permitted to sign exhibits. We believe this should be a priority. We have regularly noted in our consultation responses since 2018 the need for this to be considered in detail by Ofgem, and therefore this is clearly a priority that we have communicated with Ofgem. We are happy to discuss this issue in more detail and could raise the rule change if required.

Ofgem should clarify to stakeholders how the rule change proposals are consistent with the Evergreen CMU ID discussion in the New EMR DB portal user group.

3. Capacity Market Register

Question 2: Do you agree with the draft Rules to implement CP270 and the partial implementation of CP271?

We support the implementation of CP270. All the proposed changes in the Capacity Market Register will make it more transparent and informative, which is welcome for users of this Register.

To better improve the Register, Ofgem and the Delivery Body should standardise its format across delivery years, and preferably should use a more modern form of database, rather than relying on Microsoft Excel.

Question 3: Do you agree with our proposal where Applicants would provide the "Primary Fuel" for each Generating Unit or Component comprising a CMU?

We support this proposal.

4. Applicant Notice

Question 4: Do you agree with our proposed amendments to the Rules to facilitate our Applicant Notice proposal?

Yes, we support the proposed amendments.