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

Uniper is an international energy company with around 12,000 employees in more than 40 countries. The company plans to make its power generation CO₂-neutral in Europe by 2035. With about 35 GW of installed generation capacity, Uniper is among the largest global power generators. Its main activities include power generation in Europe and Russia as well as global energy trading, including a diversified gas portfolio that makes Uniper one of Europe's leading gas companies. In 2020, Uniper had a gas turnover of more than 220 bcm. Uniper is also a reliable partner for municipalities, public utilities, and industrial companies for developing and implementing innovative, CO₂-reducing solutions on their way to decarbonising their activities. As a pioneer in the field of hydrogen, Uniper has set itself the target of operating worldwide along the entire value chain in the future and implementing projects that will make hydrogen the mainstay of the future energy supply.

The company is headquartered in Düsseldorf and currently the third-largest listed German utility. Together with its main shareholder Fortum, Uniper is also the third-largest producer of CO₂-free energy in Europe.

In the UK, Uniper operates a flexible generation portfolio of seven power stations capable of powering around six million homes, and a fast-cycle gas storage facility.

Consultation Response

We support the intention to reduce the administrative burden of participating in the Capacity Market auction.

We note that many of the proposed amendments are heavily reliant on the delivery of the new EMR portal. We would encourage Ofgem to liaise closely with the Delivery Body to ensure that the Portal has the functionality required to implement the proposed rule changes.

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



We support the reuse of Exhibits that have been previously submitted and are still compliant with the Rules and Regulations.

Ofgem proposes that Exhibits submitted prior to the 2022 Prequalification Window cannot be reused. However, we believe that Exhibits submitted in 2021 should be acceptable to be reused in the 2022 Prequalification Window if they are still valid. We agree that the launch of the new portal should not be delayed in order to migrate data from the old portal, and it is not necessary, as an applicant could simply load up any Exhibits they wished to reuse.

As the onus remains on the applicant to review the current rules and declare compliance and validity of the application in each qualification period, a time limit on reuse of an Exhibit serves no purpose. Indeed, setting a four year maximum validity period might give the impression that checking the validity was less important in intervening years.

The function of Exhibit A as an annual declaration of conformity and validity is acknowledged but a better way of achieving this might be to add a further tick box declaration to the Application page. We understand that Ofgem may consider this if sufficient support is forthcoming from participants following consultation.

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

Uniper supports the decision to display additional information on the Capacity Market Register. Greater transparency of the resources being utilised in more complex CMUs is important to ensure consistency with other types of CMU.

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 agree with this proposal. As with our response to question 2, it is important that consistent reporting requirements are introduced for more complex CMUs.

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

We agree with this proposal to notify applicants via the EMR Portal of changes to Prequalification status.