



Consultation on Capacity Market Rule amendments (Evergreen, CMR and Applicant Notice) – E.ON response

E.ON welcomes the opportunity to comment on the Rule amendments following earlier Rules change consultations which we provided a response to.

We are fully supportive of all initiatives aimed at improving the Prequalification process and reducing administrative burden in line with our previous responses. We look forward to the implementation of the Evergreen Prequalification which will ease and simplify the application process significantly.

Evergreen Prequalification

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

We agree with the proposed Rule amendments to facilitate the implementation of reusing Exhibits and other information, however, we are disappointed that it has not been prioritised for Prequalification 2021. In our opinion the proposal to introduce evergreen prequalification is essential for improving the prequalification process and re-using Exhibits submitted prior to the 2022 Prequalification Window would have been beneficial for all participants.

Capacity Market Register

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

No comment.

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

No comment.

Applicant Notice

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

We agree with the proposed amendments to the Rules to facilitate the Applicant Notice proposal.

A similar approach should be followed for Unproven DSR CMUs, whereby regular check-ins and confirmations of the progress against milestones are introduced. We believe this is necessary due to the length of time between the awarding of an agreement and notifying EMR when the CMU has submitted its metering assessment. In our opinion introducing a process similar to the one for New Build Generating CMUs has the potential to offset the risk of administrative errors.

We believe CM providers would also benefit from a strengthened and timely communication between EMR and EMRS regarding application, agreements and other topics without the need for CM providers to intervene in order to reduce administrative burden and avoid delays.