

Heather Stewart

Acting Head of GB Wholesale Markets

By email to EMR_CMRules@ofgem.gov.uk

10th February 2022

Dear Ms Stewart,

Consultation on the Capacity Market Advisory Group (CMAG), InterGen Response

InterGen operates over 2.5GW of flexible gas generation in the UK, and currently have 1.3GWh of battery storage projects in development, and welcome the opportunity to respond to this consultation.

We welcome the proposal to establish the CMAG and set out below a few points in response to your Call for input.

We agree with the objectives and role of CMAG as set out in the new Guidance, although have reservations about the effectiveness of annual appointments to the CMAG. Due to the frequency of meeting and the lead time required to develop and work on proposals, an annual membership may be too short. We would propose 24 months as a minimum. We agree that Elexon are suitable to act as secretariat for the CMAG.

InterGen would like to express interest in joining the inaugural CMAG. It would be good to better understand the required expertise for members, so that we may be able to nominate the best candidate. We would urge Ofgem to consider carefully how the CMAG is made up, we would support a broad cross section of generators and suppliers of all sizes and representing all technology types. We also agree that representation from consumer groups such as Citizens Advice would be a benefit to the group.

We do think that establishing the group for Q2 2022 is a significant delay to the formation of the group since it was first proposed in 2019, especially as the progress of material issues in aligning the Capacity Market with Net Zero are very pertinent. We would support the earlier convening of the group to progress its objectives.

We look forward to continued engagement with Ofgem on this subject.

Yours Sincerely,

Melissa McKerrow (by email)

Communications and Public Affairs Manager, InterGen UK