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for energy consumers

## Capacity Market Rules Change

Reference number (to be  
completed by Ofgem):  
**P044**

**Name of Organisation(s) / individual(s):**  
UK Demand Response Association

**Date Submitted:**  
23/01/2015

**Type of Change:**

- Amendment
- Addition
- Revoke
- Substitution

**If applicable, whether you are aware of an alternative proposal already submitted which this proposal relates to:**

**What the proposal relates to and if applicable, what current provision of Rules the proposal relates to (please state provision number):**

Rule 13.2: DSR Test

**Description of the issue that the change proposal seeks to address:**

Rule 13.2 stipulates that performance under a DSR Test must be calculated in respect of whole settlement periods. However, other provisions allow CMUs to participate in the CM and deliver their required performance through Balancing Services such as frequency response and STOR. These Balancing Services are, by definition, not tied to settlement periods. STOR calls of 15 minutes duration occur, especially on higher-priced STOR units. FCDM events are, by contractual obligation, set at 30 minutes, but these 30-minute periods do not begin and end at settlement period boundaries except by chance (and rarely). Therefore a CMU or CMU Component whose past Balancing Service performance is assessed for Capacity Market test purposes in respect of whole settlement periods will appear to have under delivered while in fact it may have delivered perfectly in accordance with the requirements of the Balancing Service concerned.

**If applicable, please state the proposed revised drafting (please highlight the change):**

In Rule 13.2.6 and 13.2.9, after "Settlement Periods", insert "(or Balancing Service Delivery Periods)" (each occurrence)

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Insert new Rule 13.2.15: "In this Rule 13.2.6, where the CMU or CMU Component delivers or has delivered a Relevant Balancing Service, the Balancing Service Delivery Period is the required period of energy delivery in the event of a frequency deviation, STOR call-off or equivalent event stipulated in the contractual requirements for that Relevant Balancing Service.

**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:**

No requirement for code changes is apparent. Members of the UKDRA have experienced situations in which DSR CMUs or CMU Components could not pre-qualify at their full capacity because historical data did not contain sufficient periods in which the delivery of a Relevant Balancing Service co-occurred with a Settlement Period.

**Details of Proposer (please include name, telephone number, email and organisation):**

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