

**From:** Lisa Waters [<mailto:lisa@waterswye.co.uk>]

**Sent:** 24 April 2015 10:12

**To:** Mark Downham

**Cc:** Julian Roberts; David O'Neill; Alexander Roberts

**Subject:** RE: Invitation to Capacity Market Rules change stakeholder event - 9th April

Hi Mark

In terms of issues – these are the ones that I have had raised most with me:

CP59 – what if a automatic low frequency disconnection happens with loads of capacity on the system? Or it is regional. In any event should only apply from 2019 delivery year as otherwise changes the risks for 2018 after the auction.

Transparency – CP05 – everyone wants this and it is a big competition issue for those not in the CM. You will get push back from traders.

Proposal B – This implies that Ofgem don't believe competition works!

CP76 – I think this may come back to bite you! Lets discuss.

Legal opinion – this is meaningless.

More generally I think there is a lot of concern about proposals Ofgem is rejecting that just seek clarity. CP12, CP19, CP77, CP14, CP55, etc. People believe that if they think it is not clear where is the harm in the change? Also it does not balance well with Proposal A, where Ofgem is making life easier for itself, but rejecting things parties want to make their life easier. This may not be the intent, but it is the perception.

I hope that is helpful.

Best wishes

Lisa

Lisa Waters

Waters Wye Associates

Tel: +44 (0)20 8239 9917

Mob: +44 (0)78 999 24 794

[lisa@waterswye.co.uk](mailto:lisa@waterswye.co.uk)

[www.waterswye.co.uk](http://www.waterswye.co.uk)