


<h2 style="text-align: center;">Proposal for a Capacity Market Rules Change</h2>		 <p>Making a positive difference for energy consumers</p>
<p>Name of Organisation(s) / individual(s): Association for Decentralised Energy</p>	<p>Date Submitted: 15/01/2016</p>	
<p>Type of Change:</p> <p><input checked="" type="checkbox"/> Amendment</p> <p><input type="checkbox"/> Addition</p> <p><input type="checkbox"/> Revoke</p> <p><input type="checkbox"/> Substitution</p>	<p>If applicable, whether you are aware of an alternative proposal already submitted which this proposal relates to:</p> <p>We have also proposed modifications to Schedule 7 for related reasons.</p>	
<p>What the proposal relates to and if applicable, what current provision of Rules the proposal relates to (please state provision number): Simplification of metering requirements (Schedule 6)</p>		
<p>Description of the issue that the change proposal seeks to address:</p> <p>The metering provisions, in particular for small Generation CMUs and for DSR CMUs, impose a high burden on Providers without demonstrable benefit to the consumer. As most metering is dealt with by licensed third parties, customers and small generator owners seldom have adequate access to the documentation required under Schedule 6. Gathering this in the time available (especially for T-1 auctions) can be extremely difficult as it may require site shutdowns; these are often very difficult to arrange on (for example) a hospital or a datacentre.</p> <p>Similarly, bespoke metering equipment can be difficult to upgrade, and on small sites used in aggregated portfolios, the benefit can be outweighed by the cost. For example, installing the required class of current and voltage transformers will require shutdowns and invasive engineering, while the accuracy of metering of a single site can often be shown to be within the total accuracy requirements without such upgrades.</p> <p>In an aggregated CMU, the accuracy of metering of the total CMU is inevitably superior to the accuracy of metering of the individual CMU Components (or indeed of an equivalently-sized single-site CMU). This is because measurement errors on different sites are uncorrelated. Greater participation would result if this benefit were recognised because barriers to entry would drop.</p> <p>Where site settlement meters are used for CM metering, audit, calibration, testing facilities and documentation are all adequately covered by existing industry processes which settle the entire GB electricity bill (which is approximately 25 times greater than the cost of the CM). Allowing providers to refer to existing arrangements where such meters are used will remove the need to duplicate substantial and disruptive work.</p>		
<p>If applicable, please state the proposed revised drafting (please highlight the change):</p> <p>Append to Schedule 6 the following paragraph:</p> <p>“Where the Supplier Settlement Metering Configuration Solution is used and all of the meters used are maintained by a Meter Operator Agent in accordance with the requirements of the BSC, the Provider is not required to provide the information referred to in paragraph (c) sub-paragraphs (iii) to (x), or in paragraphs (f) to (p), of this Schedule 6.”</p>		

<p>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:</p> <p>This proposal makes CM participation tractable for a wider range of resources by making use of an existing, fully audited mechanism.</p>
<p>Details of Proposer <i>(please include name, telephone number, email and organisation):</i></p> <p>William Caldwell, Association for Decentralised Energy, william.caldwell@theade.co.uk, 020 3031 8740</p>