

## Proposal for a Capacity Market Rules Change



Making a positive difference  
for energy consumers

**Reference number**(to be completed by Ofgem):  
**CP134**

**Name of Organisation(s) / individual(s):**  
Green Frog Power

**Date Submitted:**  
15 January 2016

**Type of Change:**

- Amendment
- Addition
- Revoke
- Substitution

**If applicable, whether you are aware of an alternative proposal already submitted which this proposal relates to:** No

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

7.4.1 (c) in relation to and CMU that is the subject of an Application, the Prequalification Decision for that CMU

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

The Rules for prequalification are extremely complicated (we appreciate Ofgem's focus on addressing this over-arching issue) and the EMR Portal is not yet at the desired standard of user-friendliness.

The result of these two combined factors are that many CMUs fail to prequalify in the first stage – frequently for very minor administrative errors. Having a public announcement of a failure to prequalify in these circumstances is of not benefit. And it portrays a negative image of the overall efficacy and efficiency of the Capacity Market prequalification, and, most importantly, has potential reputation impacts for companies with “un-prequalified” CMUs and ensuing potential for commercial implications.

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

7.4.1 (c) After the Tier One dispute decisions have been finalised by the EMR Delivery Body, the prequalification status for that CMU

**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:**

We do not believe there would be any implications for industry codes.

We can think of no one who will suffer negative consequences as a result of this rule change. There are clear reputational and commercial benefits for parties who are able to avoid meaningless and avoidable negative press.

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

Graz Macdonald  
Head of Regulatory and Policy Analysis  
+1 819 328 8366  
[graz@greenfrogpower.co.uk](mailto:graz@greenfrogpower.co.uk)  
Green Frog Power