

Proposal for a Capacity Market Rules Change



Making a positive difference
for energy consumers

Reference number (to be completed by
Ofgem): CP218

Name of Organisation(s) / individual(s):

Association for Decentralised Energy

Date Submitted:

11.11.2016

Type of Change:

- Amendment
- Addition
- Revoke
- Substitution

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

Proposal summary (short summary, suitable for published description on our website)

CMU sites that include renewable generation should be exempt from individually metering the renewable assets through the Bespoke Metering Requirements if the amount of renewable generation does not have a material impact on the total CMU capacity.

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

Schedule 6: Metering Statement Part (1)

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

Substantial difficulties have arisen in the metering of CMUs that are situated on sites where renewable generation shares the same MPAN as the resource that seeks to participate in the Capacity Market. The current guidance states the participant must demonstrate that the CMU is not benefitting from any low carbon support, by individually metering the renewable generation.

Installing new metering for these assets can be very expensive (per MW of capacity) and complex, presenting a considerable barrier to entry; we are aware of a significant number of DSR megawatts that were not able to complete the metering requirements, and further customer sites where it was obvious that the costs of metering would outweigh the benefits of DSR participation. An example of this issue is a 3MW turndown DSR site that would normally use Supplier Settlement Metering Arrangements, but, due to the presence of 10kW of roof-top solar on the same MPAN, is not able to without going through the costly and complex metering regime of Bespoke Metering Arrangements. This is despite the site already having a FiT-registered meter that was able to deliver half hourly data of sufficient quality to ensure the site met the renewable exclusion requirements.

To avoid the waste of installing new metering which would duplicate existing installed metering (both for the renewable generation and for the boundary meter), we propose the Rules recognise FiT-registered metering when that metering is able to provide half hourly data of sufficient quality.

FiT payments are based on generation and export meter readings. All metering used for measuring generation and export from FiT installations must be approved to set standard set out [in UK legislation](#) and currently approved meters for the FiT scheme are set out [in Schedule 4](#).

We would note that the bespoke metering requirements already allow Balancing Services sites to use existing Balancing Service metering, even if this metering is not necessarily done through a Half Hourly Meter and may be by another type of measuring device. This could be a transducer, SCADA interface, analogue meter, pulsing Meter or Half Hourly Meter.

Many FiT meters will provide half hourly metering. However, the absence of half hourly metering should not be a block, as where a Half Hourly Meter is not used in the Metering System for the provision of DSR the output must be collated and converted into energy (multiples of Wh) and Settlement Period (48 periods of 30 minute duration per day) format. The method for submitting data to EMR Settlement Ltd (EMRS) is described in the Working Practice WP195 Capacity Market and Contracts for Difference Metered Data.

We would propose that an amendment to Schedule 6 would help ensure DSR CMUs can participate in CM auctions while ensuring that non-CM generation is appropriately and accurately metered and excluded.

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

Rule 3.4.7

We propose inserting a clause (iv) in Schedule 6, Part (l) as follows:

(l) Meters

A Capacity Provider must provide either:

- (i) a Manufacturers test certificate;
- (ii) a letter from the manufacturer confirming the typical errors of the device; or
- (iii) a calibration test certificate tested at the calibration testing points set out in the table below performed by a third party;
- (iv) confirmation that the meter is registered within the Feed-in Tariff scheme.**

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:

This proposal would reduce the need for additional redundant metering, reducing the cost for DSR providers to participate in the Capacity Market and increasing market competitiveness. The proposal would maintain accuracy within the Capacity Market.

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

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