


<h1>Proposal for a Capacity Market Rules Change</h1>		 <p>Making a positive difference for energy consumers</p> <p><b>Reference number</b> (to be completed by Ofgem): <b>CP268</b></p>
<b>Name of Organisation(s) / individual(s):</b> E.ON UK PLC	<b>Date Submitted:</b> 17/10/2017	
<b>Type of Change:</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> Amendment</li> <li><input checked="" type="checkbox"/> Addition</li> <li><input type="checkbox"/> Revoke</li> <li><input type="checkbox"/> Substitution</li> </ul>	<b>If applicable, whether you are aware of an alternative proposal already submitted which this proposal relates to:</b>  Click here to enter text.	
<b>Proposal summary</b> (short summary, suitable for published description on our website)  National Grid EMR to publish the specific applicable dates for key milestone reporting and independent technical expert progress reports. Currently the applicant is required to have an in-depth knowledge of the rules and/or to search through the Rules to determine the applicable dates for their construction plan, if done incorrectly this could lead to errors in the construction planning. The annual publication of the dates would remove this risk.		
<b>What the proposal relates to and if applicable, what current provision of Rules the proposal relates to</b> (please state provision number):  The milestones are listed in the Rules, such as Financial Commitment Milestone, Substantial Commitment Milestone, Long Stop Date, however, the burden is on the applicant to know where these rules are listed. The milestones are currently listed as being 'x' months before the start of the delivery year, if one of the key dates is missed then it could lead to penalties and removal of the CM agreement.		
<b>Description of the issue that the change proposal seeks to address:</b>  This proposal seeks to require National Grid to publish all applicable new build dates in date format i.e. dd/mm/yyyy each year when the 'Prequalification Guidance' is published, this should include the Financial Commitment Milestone, Substantial Commitment Milestone, Long Stop Date, Connection agreement submitted, metering statement/test certificate attained, single line diagram submitted, as well as the timetable for submitting the Independent Technical Milestone progress report. The latter of which is required to be submitted during the first year of construction after 3,6 and 9 months and then 6 monthly thereafter. This could lead to confusion as there is no definition of when the reporting months actually start from, the publication of these key dates would remove all ambiguity		
<b>If applicable, please state the proposed revised drafting</b> (please highlight the change):  N/a		
<b>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:</b>  As previously mentioned, the emphasis is placed on the applicant knowing the intricate details of the		

CM rules and may not enter into a CM agreement as they do not necessarily understand when they are required to achieve certain milestone or submit reports on the build progress. This proposal does not implement any new changes to the rules apart from placing the onus on National Grid's EMR team to publish the appropriate dates alongside the dates they already publish for prequalification, credit cover provision and auction etc. If implemented, this proposal would allow prospective generating stations to make informed decisions and to more accurately forecast their construction plan.

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

**E.ON UK PLC**