

Proposal for a Capacity Market Rules Change

ofgem

Making a positive difference
for energy consumers

Reference number (to be completed by
Ofgem): CP274

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

Date Submitted:
17 October 2017

Type of Change:

- Amendment
- Addition
- Revoke
- Substitution

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

N/A

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

The CM DSR baselining methodology fails to allow for a fair representation of the 6 weeks prior to a Relevant Settlement Period, in the case of the Relevant Settlement Period being in a holiday period.

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

There is an inconsistency in the drafting of Section 2 of Schedule 2.

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

Section 2.1.1 specifies that the data points be collected “in the same day of the week for each of the last 6 weeks (provided that where the Settlement Period for which the baseline is being calculated is on a Working Day and the same day of the week in the last 6 weeks is a non-Working Day that these equivalent Settlement Periods are disregarded);”

However, if the relevant Settlement Period occurs on a Non-Working Day like Christmas Day for example, which may be a Friday, the clause does not allow the previous six Fridays to be disregarded, even though the consumption of a site will be very different on the previous six Fridays compared to the Christmas Day.

Although it may be unlikely that a stress event will occur on a Non-Working Day, it is possible that this could occur as a result of a combination of planned maintenance of generating units over a holiday period, unplanned outages and adverse weather conditions.

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

“in the same day of the week for each of the last 6 weeks (provided that; where the Settlement Period for which the baseline is being calculated is on a Working Day and the same day of the week in the last 6 weeks is a non-Working Day that these equivalent Settlement Periods are disregarded; and where the Settlement Period for which the baseline is being calculated is on a non-Working Day and the same day of the week in the last 6 weeks is a Working Day that these equivalent Settlement Periods are disregarded);”

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:

Impact on Participants

The current arrangements are likely to lead to an over estimate of the DSR response provided by a DSR CMU. The proposed changes would mitigate this.

Impact on the Delivery Body

The change would benefit the Delivery Body by allowing a more accurate representation of DSR response, should an event fall in such a period.

Impact on other parties

None.

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

Guy Buckenham
EDF Energy
guy.buckenham@edfenergy.com
020 7752 2143