

Proposal for a Capacity Market Rules Change



Making a positive difference
for energy consumers

Reference number (to be completed by
Ofgem): CP276

Name of Organisation(s) / individual(s):
Endeco Technologies Limited

Date Submitted:
17th 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:

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

To clarify the process of providing DSR Alternative Delivery Period data to the Delivery Body for the purposes of demonstrating a DSR CMU's capacity volume for prequalification as a Proven DSR CMU.

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

This proposal relates to Rule 13.2.6A. It seeks to clarify that metering data using a time sampling frequency higher than half-hourly will be acceptable to the Delivery Body for the proving of a DSR CMU as a Proven DSR CMU for prequalification.

This proposal is predicated on the understanding that in their present form Rule 13.2.6 and Schedule 2 can be used, without amendment, to accept three periods of 30 consecutive minutes of historic data from a Balancing Service metering solution under the auspices of DSR Alternative Delivery Periods, and to use the same data sets to compute acceptable Baselines for those historic periods, in order to calculate the DSR Volume for a DSR CMU looking to prequalify as a Proven DSR CMU.

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

The current constructions of Rules 13.2.6 and 13.2.6A permit the nomination of DSR Alternative Delivery Periods – “a continuous period of 30 minutes” – in the proving of a DSR CMU's volume as it seeks to prequalify as a Proven DSR CMU. It is unclear, however, that the underlying data which describes the DSR Alternative Delivery Periods will be automatically accepted by the Delivery Body.

If the Delivery Body isn't fed the data initially, then a DSR provider may fall foul of Rule 13.2.6A(a)(ii). In the case where a DSR CMU has listed in its Metering Statement that its DSR CMU Components are using Supplier Settlement Metering, then the data flowing to EMRS and to the Delivery Body from those sites will be half hourly settlement metering data, and not data of the sampling rate required by Rule 13.2.6.A(a)(i).

It is permitted in the Capacity Market for a provider to be delivering Capacity whilst at the same time delivering a Relevant Balancing Service. Where this is happening, then whilst suitable data is available it may not be available to the Delivery Body without it being passed directly to the Delivery Body by the

Capacity Provider. Rule 13.2.6A is silent on the obligation on the Delivery Body to accept such data not already supplied to it, which this proposal seeks to amend.

It should be the case that the Delivery Body accepts adequately formatted Balancing Service Metering data so that it can construct from it a suitable DSR Alternative Delivery Period as well as the data needed to create a Baseline for that DSR Alternative Delivery Period. This proposal suggests that the text of Rule 13.2.6A(a)(ii) is altered to make clear that data for DSR Alternative Delivery Periods is made available to the Delivery Body, such that it need not initially be available to them, but provided where appropriate.

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

RULE 13.2.6A

For the purposes of Rule 13.2.6(a):

(a) a DSR Alternative Delivery Period may be identified by a CMU only where:

(i) that CMU is metered using a higher time sampling frequency than half-hourly; and

(ii) the metered data is available to the Applicant or Capacity Provider and is made available in an agreed format to the Delivery Body.

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:

Working Practice 195 describes the format of data to be supplied to EMRS and the Delivery Body in the case of the use of Balancing Service Metering solutions for Capacity Market participation. Such data formats should be applicable to the construction of DSR Alternative Delivery Period data and requisite Baseline data.

Each Capacity provider will know the location of their CMU (or of each of their CMU components), and can therefore perform all necessary calculations required by Working Practice 195 to create data ready for submission. Second-by-Second data for a period of six weeks preceding each Balancing Service action can easily be summarised into 30 minute blocks so that the requisite Baseline calculations can be done. With agreement – where necessary – between EMRS and the Delivery Body on an update to Working Practice 195 regarding this process, there should be little in the way of hindrance for such a methodology to be widely adopted.

We also note that in the EMR Portal, a provider cannot directly indicate the specific Settlement Period in which the test is conducted. The Delivery Body will therefore only be looking at the data provided to them for the full 48 Settlement Periods contained within these dates, and could easily examine instead the data supplied by a Provider from Balancing Service metering.

As such, there should be no impact on industry and/or consumers by making this amendment. The Rules already permit the use of DSR Alternative Delivery Periods, and this amendment merely clarifies the process of doing so.

This amendment, in facilitating easier proving of DSR CMU capabilities will make it easier, quicker, and cheaper for companies to offer their load into the Capacity Market, by helping them to make use of performance data which they already have gathered in response to Balancing Service activities. This will help to facilitate National Grid's stated aim of delivering 30%-50% of Balancing Services from Demand Side Response by 2020.

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

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