


<h1>Proposal for a Capacity Market Rules Change</h1>		 <p>Making a positive difference for energy consumers</p> <p>Reference number (to be completed by Ofgem): CP310</p>
Name of Organisation(s) / individual(s): Green Frog Power	Date Submitted: 17/10/2017	
Type of Change: <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Addition <input type="checkbox"/> Revoke <input type="checkbox"/> Substitution 	If applicable, whether you are aware of an alternative proposal already submitted which this proposal relates to: We are unaware of any related alternatives.	
Proposal summary (short summary, suitable for published description on our website) Changing CMU from CMRS to non-CMRS and vice versa		
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 the addition of providing the explicit permission for the Delivery Body to amend the CM Register with the status of the CMU as CMRS or non-CMRS (Rule 7.5.1).		
Description of the issue that the change proposal seeks to address: <p>The choice of what metering system to adopt at different times is a commercial decision and should not be limited by participation in the CM, any more than the any other commercial arrangements that may come and go over the duration of a CM Agreement should be limited by CM Rules.</p> <p>The requirements in the Rules to provide up-to-date information regarding metering changes already address the issue of reliability of the deliverability of CM obligations. The categorisation of a CMU as CMRS or non-CMRS is therefore inconsequential in regard to the CM, except that the ability to change between them is important for generators to operate in the most efficient manner.</p> <p>CMRS/non-CMRS information is more appropriately aligned with metering information, which is changeable, than aligned with fundamental CMU characteristics. It is our suspicion that this area of the current CM Rules, which do not require that this information is submitted by the Applicant, is a carryover from very early stages of CM Rules and is no longer appropriate nor fit for purpose. This legacy issue could have a significant impact on the ability of parties to operate most efficiently.</p>		
If applicable, please state the proposed revised drafting (please highlight the change): Add to 7.5.1 a requirement on the Delivery Body to update the CM Register when it is notified of a change of metering registration. For example: (rb) – to record the change in CMU type from CMRS to non-CMRS or non-CMRS to CMRS for a Generating CMU notified 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:

This change will ensure that generators are able to operate in the most efficient manner as appropriate for the site configuration, market conditions and/or specific business model as may be amended from time to time. This efficiency improvement will benefit the competitiveness of the energy market, operation of the CM and ultimately consumers.

The proposal is not in conflict with The Electricity Capacity Regulations.

We foresee no wider impact on other industry Codes.

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

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