Proposal for a Capacity Mark Rules Change	et	<b>ofgem</b> Making a positive difference for energy consumers <b>Reference number</b> ( to be completed by Ofgem): CP318
Name of Organisation(s)/individual(s): EMR Delivery Body	Date Submitted: 17 October 2017	
Type of Change:	If applicable, whether you are aware of an alternative proposal already submitted which this proposal relates to: CP191	
⊠ Amendment		
□ Addition		
□ Revoke		
□ Substitution		
NGET would like to reopen the discussion around CP191 which details amendments to Rule 2.3.5, 2.3.8 and 2.3.10 to allow the use of distributed connected generation output data to calculate de- rating factors relevant to Technology Class Weighted Average Availability (TCWAA), rather than incorrectly using the closest transmission generation technology. Using transmission level data for distribution level generation is not appropriate. The current rules force a de-rating factor on distribution generation that is not based on their operation but on the operation of another group of generators. The aim of the rule change proposed is to use appropriate data, where possible, to improve the accuracy of de-rating factors. We would welcome further consideration with Ofgem and BEIS' independent PTE to ensure the correct de-rating factors are used in Capacity Market modelling and auctions.		
What the proposal relates to and if applicable, what current provision of Rules the proposal relates to (please state provision number):   2.3.5 & 2.3.8 & 2.3.10		
Description of the issue that the change proposal seeks to address:		
Amendment of Rules to remove risk of using inaccurate de-rating factors for distribution connected generation.		
If applicable, please state the proposed revised drafting (please highlight the change):		
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:		

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

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