

**EMCO's response to Ofgem's consultation on its minded-to position to renew the designation of Nominated Electricity Market Operators in Great Britain for a time-limited duration**

EMCO believes that the submission of a designation application every four years or less is extremely burdensome and costly.

We believe that regular monitoring by the NRAs, as well as a requirement placed on NEMOs to update NRAs on any material changes to anything that could affect the NEMO's designation ( e.g. organisational restructuring) would be a more efficient way of ensuring that a NEMO complies with the CACM designation requirements. This practice has already been adopted by the Danish and Swedish NRAs in their NEMO designation decisions.

If a NEMO ceases to operate it should of course notify the competent NRAs.

An indefinite yet monitored designation would also reduce the risk that a Member State may find itself in breach of CACM Article 4(1) if no NEMO applies.