

Modification	Current Status	Summary	Response
CP248	Reject	This proposal would allow transfer of agreement(s) at any time outside of the Prequalification window. Currently, transfers can only take place after the T-1 Auction for the relevant delivery year. ³	Agree (Consider Taking this Forward) –Currently, the transfer of a CM agreement from one project to another is not explicitly contemplated in the CM Rules and there is a heavy reliance on support from National Grid Delivery Body. We would support the introduction of a defined process to transfer a CM contract from one project to another, in a similar way to the CMU Transfer mechanism between companies. We expect that this is a common process, is appropriate for the provision of capacity in the long term and would be used more regularly if an official defined method could be established.
CP258	Reject	Reinstate the option for Applicants to defer provision of Relevant Planning Consents until after Prequalification for the Sixth Full Capacity Auction and all subsequent Capacity Auctions if Applicants pay an “Application Fee” if planning is not provided by 22 Working Days prior to the commencement of the first Bidding Window in relation to such Capacity Auction.	Agree (Consider Taking this Forward) – If the aim of the CM is to provide the best value for money to customers, supplying planning consent will not impact the CMUs ability to participate in the auction, provided that the planning consent is still submitted in a timely fashion (e.g. before the Auction).
CP268	Reject	National Grid EMR to publish the specific applicable dates for key milestone reporting and independent technical expert progress reports.	Agree (Consider Taking this Forward) – We strongly agree with this change, it will result in easier management of post auction activities. Therefore, it should minimise the number of CMUs who may fail to meet these milestones due to the ambiguity of current milestone dates/timelines.
CP282 & CP311	Reject	Remove the Capacity Obligation of Distribution CMUs in periods when they are subject to an interruption by a DNO (‘Relevant interruptions’). Relevant Interruptions are currently only defined for Transmission CMUs.	Agree (Consider Taking this Forward) – In the spirit of fairness this should be considered, as currently there is discrimination in favour of Transmission CMUs. If the DNO is responsible for the interruption the CMU should not be held accountable, therefore should not be subject to penalty charges.
CP306	Consider Further	Remove 4.4.4. which restricts generation unit configurations after the CMU has pre-qualified	Agree (Consider Taking this Forward) – We are supportive of increasing the flexibility for amending CMUs after prequalification, in order to configure the CMU in the most efficient way. The prequalification window should not hinder choice of plant type and configuration. This also feeds into our response to CP248 above – CMU transfers would be easier to manage if the configuration can be altered (while still maintaining all relevant capacity delivery obligations and the same generation class)
CP312	Partially Take Forward	We propose that Construction reports be submitted in mid-March, mid-June, mid-September and mid-December (or similar), regardless of when the auction was for the various CMUs.	Agree (Consider Taking this Forward) – We strongly agree with this change, it will result in easier management of post auction activities. Therefore, it should minimise the number of CMUs who may fail to meet these milestones due to the ambiguity of current milestone dates/timelines.

CP338	Take Forward	This proposal will allow Capacity Providers of Distribution connected CMUs to aggregate CMRS CMUs as part of a CMU Portfolio for the purposes of Satisfactory Performance Days	Agree - non-CMRS Distribution CMUs. This will ensure fairness between CMRS and non-CMRS Distribution CMUs.
CP349	Consider Further	<p>This proposal would require a Distribution Connection Agreement for a New Build Generating CMU to be firm where firm means a connection that is not part of a scheme that could result in curtailment of access when the connection to the network is intact and operating normally.</p> <p>Generating CMUs that use the transmission network only have the option of a 'firm' connection to the network. New users of the distribution network can opt for an interruptible connection – they are not then required to pay for the necessary upgrades to the network to ensure they can export power. This allows multiple embedded CMUs to connect onto the same part of the distribution network even where there is not the infrastructure to allow them all to generate simultaneously. The lack of a firm connection may affect the ability of a distribution connected CMU to deliver its capacity obligation in a system stress event.</p>	<p>Disagree –</p> <p>We agree that it would be more appropriate to de-rate 'non-firm' connected CMUs rather than to prevent them from participating in the auction. In order to offer the best value for money to customers the more CMUs included in the auction the better.</p>