

## EMR Customer Events – Questions and Answers

### 19 July Event

1. Can you give an evergreen application a new CMU name?	DB	If you need to clone your CMU, or re-create it afresh, you may still re-use Evergreen Exhibits provided that the link between your old and new CMUs is made clear, and all other criteria for re-use have been met.
2. As connection capacity for multi assets cannot exceed TEC, will this be accompanied by new DRFs for these assets? Different configs might yield different DRFs.	DESNZ	We do not currently have plans to review the approach to de-rating factors for these sites, but we welcome views from industry on whether there is a case for change in approach.
3. Multi-Unit Site what is the definition of this? Is it one site split across multiple CMUs, or one site split into multiple components in a single CMU.	DESNZ/DB	The multi-unit term refers to sites where a connection agreement may be shared across multiple CMUs. For the purposes of the new connection capacity rules implemented from 12 July 2023 (available <a href="#">here</a> ), the aggregate Connection Capacity of all Generating Units comprised in a CMU must not exceed the sum of the TEC or MEC (as applicable) which apply to each of the Generating Units comprised in that Generating CMU. Therefore, while there are additional data requirements for multi-unit sites, each Generating Unit's Connection Capacity is capped at their TEC/MEC value regardless of whether they are part of a multi-unit site, or their chosen Method of Calculation.
4. Question for DESNZ, Price Cap and Net CONE were set almost 10 years ago based on OCGT costs. Any plan to review these figures?	DESNZ	We do not currently have plans to review the Price Cap and Net CONE.

5. Evergreen Exhibits how does this work for an Exhibit C as this is under company? Can you reuse one exhibit but not all? If so, do we have to detail which ones	DB	Exhibit C is normally uploaded at Company Management level. When creating an Application, Exhibit C will automatically feed through an Application as a mandatory Exhibit. If any changes have occurred (i.e. change of Director(s) or change of address) an updated Exhibit C would have to be re-uploaded accordingly at Company Management level to avoid failure. The Evergreen element here applies if there are no changes to Exhibit C and the version re-used remains as it was (no changes have occurred). You would tick the declaration in the Application under Evergreen Exhibits that you are re-using all or some of the Exhibits from the previous year and give us the Application ID to which the Exhibits refer to. The DB would then assess the relevant Exhibits depending on your Applicant Status (Legal Owner/Despatch Controller, DSR Provider, Joint Owner).
6. If connection capacity cannot exceed TEC does this mean that historic HH cannot be used, if the cumulative historic HH of the units exceeds the TEC?	DESNZ/DB	The sum of connection capacities at a site cannot exceed the total TEC or MEC for that site, so that the connection capacity appropriately reflects the credible export capabilities of units within that site – this applies across TEC, MEC and Average Output as per Rule 3.5.1A. This is set out in updated Delivery Body guidance available at <a href="https://www.emrdeliverybody.com/CM/Guidance.aspx">https://www.emrdeliverybody.com/CM/Guidance.aspx</a> .
7. When will the Exhibit tool will be published?	DB	Exhibit templates and tool have now been updated in the portal.
8. Is there any requirement for the provider to have a license such as supplier or virtual lead party? if yes, when is this license required to be in place?	DB	The CM Rules do not state whether a licence is required, however, it is generally not possible to connect to the national grid or export to the system without a generation licence. There may be some exceptions where a generation licence is not required, for example very small-scale generation projects. It is advisable to contact Ofgem directly for more information regarding the requirements for a licence.
9. What is the source for DESNZ technical de-rating of interconnectors based on PTE recommendations?	DESNZ	The technical de-rating factors are based on a mix of the historic outage rates and data from the SKM (Sinclair Knight Merz) report provided to Ofgem.

10. There were interesting storage declarations in the last auction. Is it permitted for a 100MW/2hr (200MWh) battery to prequalify as a 50MW/4hr (200MWh) instead?	DB	<p>If the duration of the battery can be achieved for 4 hours (8 settlement periods in an EPT), bearing in mind the changes to capacity obligation based upon how the de-rating factors would change.</p> <p>The rules don't seem to forbid this, given the duration outputted in MWh would still be the same and thus provide the same total capacity.</p>
11. Please can you provide an update on the storage derating factor methodology review? When should we expect a publication	ESO - EMR Modelling team	<p>Our Electricity Capacity Report (ECR) webinar indicated that the ESO is planning to consult on any proposed changes to our storage de-rating factor methodology in the Autumn. This only refers to ESO consultation requirements. Any Government consultation on changes to the CM rules, if required, would be announced separately by Government. Our ECR webinar slides and recording can be found here:</p> <p><a href="#">Latest News - 2023 Electricity Capacity Report (ECR) Webinar... (emrdeliverybody.com)</a></p>
12. On the process to be instructed, how do we get instructed by the Control Room? is there any specific IT system requirements? or is it by phone?	DB	<p>CM Participants are expected to respond to Capacity Market Notice which will be issued by the ESO. Please subscribe to the notifications via the website. <a href="#">GB Electricity Capacity Market Notices - National Grid (nationalgrideso.com)</a></p>
13. If we get instructed, what data and when do we need to send it?	EMRS	<p>We have a Stress Event guide which Capacity Providers can refer to understand what they'd need to provide in G18 Stress Event Guide: <a href="https://www.emrsettlement.co.uk/publications/guidance/">https://www.emrsettlement.co.uk/publications/guidance/</a></p> <p>If there are still questions after reviewing the guide then please get and touch and we can answer questions about specific your Capacity Market Units: <a href="mailto:info@electricitysettlementscompany.uk">info@electricitysettlementscompany.uk</a> &amp; <a href="mailto:contact@emrsettlement.co.uk">contact@emrsettlement.co.uk</a></p>
14. What are likely changes to satisfactory performance days and extended	DESNZ	<p>We would like to thank respondents for their detailed feedback to our January 2023 consultation on changes to Satisfactory Performance Days (SPD) and Extended Performance Test (EPT) frameworks. No changes</p>

performance test in phase 2 and how will it affect batteries?		have been made to SPDs or EPTs this year – as set out in our <a href="#">government response</a> to consultation, proposals related to SPD and EPT arrangements are in Phase 2. As such, they will be subject to further development and analysis prior to taking a final decision on implementation from 2024 at the earliest.
15. How many registered Independent verifiers are there now?	DESNZ	4
16. What happens if a new build distribution site with CM agreement receives a delayed grid connection due to statement of works, & no longer ready on time?	DB	<p>The CM Rules (6.7.7) have addressed the situation when a CM Participant cannot provide the CM services in time due to delays in connections.</p> <p>A rule change proposal has been raised to CMAG (Capacity Market Advisory Group) on this matter recently and is going through the CMAG process. Please follow the CMAG website for update.</p> <p><a href="#">Homepage - Elexon CMAG</a></p>
17. Will you be providing updated guidance on what is expected for batteries in this year's prequal in advance of meeting obligations for the EPT tests.	DB	No change to EPT standards, so guidance continues to be valid.
18. What are the requirements for a CMAG change to be considered urgent?	Ofgem	<p>Ofgem will endeavour to make a decision on an Urgent Capacity Market Rule change in an expedited timeline (which would include a minimum 28-day statutory consultation). However, the following criteria must be met for a request to be considered urgent:</p> <ol style="list-style-type: none"> <li>1. Affect the efficient operation of the capacity market, and/or</li> <li>2. Have a significant commercial impact on capacity market participants, possible capacity market participants, consumers or other stakeholders.</li> </ol> <p>The issues highlighted must be met for the request to be deemed 'urgent', and will be considered on a case-by-case basis. More</p>

		information can be found in <a href="#">Ofgem's Guidance for the CM Rule Change Process</a> .
19. Is there any move to open up new build t-1 contracts that haven't achieved SCM to secondary trading?	DESNZ	<p>Thank you, we will consider this feedback. If you would like to discuss this proposal in more detail please reach out to our team inbox at: <a href="mailto:electricity.security@beis.gov.uk">electricity.security@beis.gov.uk</a>.</p> <p>Through CMAG there is currently ongoing work on a number of change proposals in relation to secondary trading, these can be found here: <a href="#">Homepage - Elexon CMAG</a></p> <p>If you are interested in raising a CM Change Proposal, or coming to CMAG to discuss a potential proposal, please reach out to the CMAG Secretariat who will provide Proposers with support: <a href="mailto:CMAG@Elexon.co.uk">CMAG@Elexon.co.uk</a></p>
20. EPT schedule is linked to CMU and not to battery component. Can it be tied to battery instead so it does have to prove EPT again, if transferred to diff CMU?	DESNZ	Thank you for sharing this feedback – we will look to consider this suggestion as part of the Phase 2 considerations for the EPT proposals.
21. How often is the Capacity Market Deadline tool updated? Yearly, with each new Prequal?	DB	The document will be refreshed and republished in the summer, around mid-August following auction deadlines and internal process.
22. The EMR phone line sometimes disconnects if on hold for too long - can you implement a queue for busy days?	DB	We are reviewing options for queue management for our phone lines to stop calls from disconnecting.
23. Q for EMRS: when are the monthly weighting values published? I don't think the 2023/24 values have been published yet.	EMRS	<p>The monthly weighting factors are published once the Schedule of Supplier's Monthly CM Supplier Charges and Credit Cover are issued at the end of July.</p> <p>The monthly weighting factors are published in the Key Payment Figures within the <a href="#">Settlement Data</a> section of the EMRS website.</p>

24. Q for EMRS: Can the D0357 setup process be improved? Some suppliers are very slow to respond/don't know how to setup the flows/request EII certificates.	EMRS	<p>The process steps to setup D0357 is detailed in <a href="#">BSCP503: Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS</a>. In addition, a summary guidance is available, <a href="#">HHDA Metering Solution for EMR</a>.</p> <p>EMRS recently published '<a href="#">How to setup the D0357- Half Hourly Metered Data for EMR data flow</a>' within our news section to support both Capacity Providers and Suppliers.</p> <p>Note: <b>2.9 Provision of Data to a CM Settlement Services Provider</b>, within <a href="#">Section S</a> of the Balancing and Settlement Code confirms:</p> <p>2.9.1 Where a Supplier that is the Registrant of an SVA Metering System associated with CM Assets is so requested by a customer or generator that has entered into a Capacity Agreement in respect of those CM Assets then that Supplier shall ensure that its Half Hourly Data Aggregator provides metered data relating to that SVA Metering System to a CM Settlement Services Provider in accordance with <a href="#">BSCP503</a>.</p> <p>For <b>Capacity Providers</b>, the process at a high-level is captured on the <a href="#">Stakeholder Support for Capacity Providers</a> webpage in '<a href="#">Step 5 – Submit Metered Data</a>'.</p> <p>If you continue to face challenges within this process please do contact the <a href="#">Service Desk</a>.</p>
25. EMRS- Which team to contact for issues in Metering audits carried out by Metering agent, Siemens?	EMRS	<p>If you need assistance with Metering Site Audits, please do email our Metering Team and they'd be happy to support you. Email address: <a href="mailto:metering@emrsettlement.co.uk">metering@emrsettlement.co.uk</a>.</p>
26. Do the D0357's need updating annually or are they in place until something changes?	ESC	<p>Yes, once the D0357 has been established this doesn't need updating unless something changes. E.g. a change of Supplier or not required within the next Delivery Year.</p>

---

There are instances where the data flow will expire usually where no **effective to date** is provided in the D0354. In these cases you would need to re-establish each time when the flow expires. You may be able to ask your Supplier to put a high-end date as **effective to date** and therefore wouldn't expire unless something changes. However, this would be dependent on whether the Supplier and HHDA system support this.

The process steps to setup D0357 is detailed in [BSCP503: Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS](#). In addition, a summary guidance is available, [HHDA Metering Solution for EMR](#).

---

## 25 July Webinar

1. EMR DB - will results letters be published on the portal on the 31st October or 1st November?	DB	The results letters will be published on 31 <sup>st</sup> October.
2. If the T1 auction takes place on 20th Feb, will we know the clearing price on either that day or 21st Feb rather than having to wait 8 working days?	DB	The clearing price will be known on the same day but the Final Results Report will be published by the 8 <sup>th</sup> working day.
3. EMR DB - with the new changes to primary fuel type and multi-sites, will CPs need to create new/clone CMUs in order to edit these changes at CMU level?	DB	An edit functionality has been introduced to support the amendments required for this year's rule changes. It will be live on the Portal during the submission window it will be named "Edit Component Level for 2023 Changes". This functionality doesn't require a new CMU to be created. However, if a CP would prefer to create a new CMU, these fields are present on the Bulk Upload Template.
4. If a CMU has a shared connection agreement sharing with generating units that aren't part of any CMU what detail do we say for 'please list the other CMU ID's	DB	This specific field can be left blank in this scenario, but we would ask that the covering letter provides us with sufficient information on the other units on the site and any obligations they may have to allow us to build up a proper understanding of the site arrangements.
5. EMR DB - if cloning CMUs, can exhibits be reused via the new evergreen exhibit rule? The CMUs will be linked but the ID on an old exhibit will incorrect.	DB	If you need to clone your CMU, or re-create it afresh, you may still re-use Evergreen Exhibits provided that the link between old and new CMUs is made clear, and all other criteria for re-use have been met
6. Do you need to clone/create a new CMU each previously successful CMUs for the new pre-qualification process?	DB	CMUs can be re-used without having to clone or create a new CMU each year. For ease of use, Applications can be cloned, but please pay attention to any rule changes that may have happened, and check that all documents are present. If a CMU is moving from being a New Build to an Existing CMU, they would have to clone the CMU before they can submit an application.



		If an Unproven DSR CMU has completed its DSR Test and is entering as a Proven DSR, they would need to clone the CMU in that instance too.
7. Can you clarify whether rejecting/capping CMUs who submit average metered data above TEC is an EMRDB interpretation of the rules, or listed in the rules?	DESNZ/DB	Please see the response for Q6 from the 19 July Event.
8. Does DESNZ think 4 IEVs is enough to manage all verifications for the CM by prequal 2024? Even with the additional time, more than 4 IEVs will be necessary	DESNZ	DESNZ has launched a comms campaign to encourage CMUs to book in their emissions to be verified and any verifications undertaken for prequalification in 2023 will remain valid for prequalification in 2024. DESNZ is also meeting regularly with the IEVs to discuss uptake and their capacity.
9. Is it possible for DESNZ to give more guidance around the typical cost of an IEV? Maintain position that spot checks rather than whole industry IEVs better!	DESNZ	DESNZ strongly encourages CMUs to approach one of the four IEVs to obtain a quote.
10. Regulation 41 - Will the volume reallocation window also be delayed if data is not available to confidently calculate over/under delivery?	DESNZ	As per our government response to consultation, we will continue to explore if complementary changes are required and will consult stakeholders if appropriate changes are identified. We would also like to thank respondents to the government consultation who queried whether wider penalty timeline changes might be required.
11. Is DESNZ looking to approve more IEVs before prequal 2024?	DESNZ	<p>Currently, there are four independent emission verifiers and we hope over time there will be more in the future.</p> <p>UKAS is the national accreditation body for the United Kingdom, appointed by the government to assess organisations that provide certification, testing, inspection and calibration services.</p> <p>Organisations that already have been accredited to ISO 14065:2013 Green House Gases can apply to extend their scope to include</p>

		verification of FFEDs in the Capacity Market. Other bodies may apply but will need a full assessment for conformity with ISO 14065:2013.
12. Is there a mock stress event scheduled?	EMRS	<p>ESC has compartmentalised different parts of the Mock Stress Event (MSE) process and are carrying out testing separately. We've started with replicating the MSE calculation process, sending out reports showing CMU position had a Stress Event taking place. We plan to issue the Mock Stress Event calculation report twice at the start of the next delivery year at the start and in the New Year.</p> <p>Our next phase of work will be setting up a process to test Volume Reallocation and continuing to review the internal processes and data transfer between Delivery Partners. We will provide an update on this progress in the new delivery year.</p> <p>If there is any feedback on any of this activity, please contact ESC or EMR Settlement  <a href="mailto:info@electricitysettlementscompany.uk">info@electricitysettlementscompany.uk</a> &amp; <a href="mailto:contact@emrsettlement.co.uk">contact@emrsettlement.co.uk</a></p>
13. Can we get early guidance on lead times for IEV and emissions requirements? Do emission CMUs require contacting an IEV now?	DESNZ	<p>DESNZ strongly urges that CMUs contact IEVs as soon as possible to avoid oversubscription before the 2024 prequalification.</p> <p>It is crucial that CMUs which require complex checks book their verification as soon as possible as the emission profile of the Fossil Fuel Component may vary over time and calculations will be required to be carried out using datasets from a continuous 12-month period during the 14 months leading up to the application being submitted.</p>
14. Please could you make a link available /ensure document references the website for the IEV providers?	DESNZ	<p>Details of the IEV companies are available here. This will also be included in any post launch event comms  <a href="https://www.ukas.com/accreditation/about/developing-new-programmes/development-programmes/ecm-verification/">https://www.ukas.com/accreditation/about/developing-new-programmes/development-programmes/ecm-verification/</a></p>

15. How would you suggest registering a Storage CMU for T-4 auctions to comply with Rule 13.4A: Lower duration? Lower Connection Capacity?	DB	Rule 13.4A refers to Extended Performance Testing. If there is a specific question regarding a specific site, please get in touch with us <a href="mailto:emr@nationalgrideso.com">emr@nationalgrideso.com</a> .
16. During a stress event, would a CMU expect an energy payment from the supplier for the energy injected into the grid?	EMRS	Payments from supplier would be in line with your contract with a supplier and are separate to capacity market payment / penalties. For as stress event any over-delivery or penalty charges would be invoiced by EMRS Settlement Company.
17. EMR DB - will you do presubmission checks on all saved / submitted applications if saved/submitted by week three?	DB	Pre-validation checks will be performed on all applications that have been saved or submitted by the commencement of each check. Our first check will be performed in week 3 of the submission window, and this will check all the applications that were saved or submitted up to that point. We will do further checks throughout the submission window based on levels submitted.
18. Please remember when checking a prequalification application that the metered data submissions for a small BMU cannot be checked via the bmreports website. The "bmreports" website doesn't include metered output for every BMU - small sub 100 MW new BMUs are not always included.	DB	We take great care to properly validate historic performance of a CMU, and have taken your comment on board and will review our processes. If you have any concerns about your Prequalification Application, or how we assess them, please reach out to us at <a href="mailto:box.EMR.Prequal@nationalgrideso.com">box.EMR.Prequal@nationalgrideso.com</a> .
19. EMR DB - can you confirm a ZB is only required for non-fossil fuels if it is a prospective or unproven DSR CMU?	DB	Exhibit ZB is required for all Prospective and Unproven DSR CMUs, regardless of their Fossil Fuel position. Exhibit ZA is only required for Existing and Proven DSR CMUs with Fossil Fuel Components.
20. When will the exhibit tool be published?	DB	The tool was published on the Portal on 24th July 2023. <a href="https://www.emrdeliverybody.com/CM/Guidance.aspx">https://www.emrdeliverybody.com/CM/Guidance.aspx</a>
21. Exactly when will the exhibits tool be released on the website? Are there any notable changes to the docs?	DB	The tool was published on the Portal on 24th July 2023. <a href="https://www.emrdeliverybody.com/CM/Guidance.aspx">https://www.emrdeliverybody.com/CM/Guidance.aspx</a>

		There have been no changes to the Exhibits from PQ22, but it remains the obligation of the Capacity Provider to confirm their exhibits abide by the CM Rules.
22. Does the CFD exclusion apply to sites which had a CFD contract but have elected not to start the CFD and therefore not in receipt of CFD support?	DB	Units that are subject to a CfD agreement cannot enter the capacity market even if they are pre-delivery, as they are still considered to be benefiting from the subsidy.
23. We are a new build CMU entering into our 2nd capacity auction. Do we need to repeat the same process as last year (with 2023 updates) or can we clone the CMU?	DB	An applicant is responsible for reading the revised guidance / rules every year to determine how they complete an application for the current PQ for their particular asset(s) as it very much depends on the circumstances of the CMU and whether anything has changed since they last submitted an application. It may well be that the CMU/application can be cloned but the DB is unable to advise how they should proceed.
24. For FCM, which requires an ITE report, do MPs with previous contracts need to get an updated ITE report for this year	DB	Ideally a new report would be created to reference the correct CAN ID, but can accept documentation for a CMU. For example a T-1 and a T-4 asset from the same auction year, could pass FCM on the T-1 and apply to the T-4 too.