

Question Log Resolution Plan

Key:
STC: Subject to Consultation
IR: for Industry Resolution meeting/ forum
Closed: non issue
?: Clarity on the question is needed.

Programme / Project Name	DECC EMR Collaborative Workshops
Programme / Project Manager	Stuart Cook
Last Updated	29/11/2013, 17:30 Version1.0



Issue Id	Issue raised and discussed at Collaborative Development	Categorisation		Status	Response
		No evidence that this is an issue	Addressed in Consultation Document/ Rules/ Regulations		
1	To what extent can National Grid be transparent about the methodology which will be used to determine the demand curve?		x Section 4.2.1.2 Demand Curves	Closed	Will be answered in the Delivery Plan
2	How will demand side response be factored into the demand curve?		x Section 4.2.3.1 Auction Frequency page 167	STC	
3	Will the methodology for determining the demand curve be based on the approach that Ofgem currently adopt? If not, could differences in the approach be highlighted? How will the possibility that Ofgem will publish a capacity assessment in the same year as publication of the initial demand curve be handled?	x Section 4.2.1.2 Demand Curves		STC	Ofgem is independent and will do their own independent analysis in 2014. After 2014 Ofgem will not be required to produce a capacity assessment. Next year Ofgem and NG capacity assessments to inform capacity to procure will be independent. Further details about the analysis will be published along side the Government response.
4	Is there scope for greater industry input to this process?		x Section 4.2.1.2 Demand Curves	STC	Target Demand - via the NG process. Other demand curve parameters STC
5	What does DECC actually publish in terms of what NG knows regarding specific plant, and going in as price makers or price takers etc.? Industry concern regarding publication of commercially sensitive information, or information that might signal the potential closure of a plant. Further issue regarding publication of settlement data		x Chapter 5 Ensuring Effective and Transparent Delivery of EMR	IR	
6	Need to understand end-to-end process timescales: Comment 1: Demand curve published in July. Will I need to say whether I'm price maker or taker before pre-qualification. Have to submit a qualification as to why a generator is a price maker, however, need to submit application form in August. Worry that insufficient time between process points Comment 2: Is there a risk that all companies take the price-maker position due to risks and timing of this process Comment 3: Timing of entire process needs to be sufficiently long and flexible such that there is no 'breach of human rights' Comment 4: National Grid could issue a 'shadow run' prior to the legislation taking effect. Demand curve more important than pre-qualification process in risk terms Comment 5: Time periods – can't procure new build in a year ahead auction. How is the set-aside volume determined and on what time periods? Separate out DECC forecasting periods compared with contract periods Comment 6: Risk will be priced into auction if timescales are insufficient	x Comment 3	x x Comment 1 [4.2.3.5 Price takers and price makers] x Comment 2: [4.2.3.5 Price takers and price makers] x Comment 5 x Comment 6	Closed	
7	What is the definition of a CMU and how does it relate to the definition of a BMU? Comment 1: Definition should reflect decisions regarding: opt-in/out decisions; metering; station transformers Comment 2: currently sound like they could be different depending on who you are (plant, ind. site) and the point in time. Comment 3: Need to ensure definition works with metering definitions and metering Codes Comment 4: does the de-rating affect the definition of the CMU over time? E.g. if wanted to participate in additional auctions for any additional capacity does the CMU definition prevent this? Splitting of 1 unit between a number of agreements. Comment 5: Regarding "Handle a novation", this definition is key to determine how obligation can be taken on.		x Section 4.8.1 (pages 244-246)	STC	
8	What is the timeline for appeals processes? What is the process for appeals? How in particular does the separate judicial process work?		x Section 4.2.2.8 (page 163)	STC	We are already working with Ofgem to agree a process.
9	How is de-rating calculated, and what capacity definition is used? Comment 1: Noted that de-rating cannot occur outside of the range Comment 2: What rating is used in the auction if the rating figure is subject to dispute?		x Section 4.8.2 (paras 757 to 763)	STC	NG is doing work on derating for the capacity assessment. DECC will do policy work on whether plant should be able to offer in a range.
10	If I have participated in the first round of the auction as an 'opt-in', then my price doesn't clear, what is my 'classification' following the auction		x Section 5.4	STC	
11	Can you cancel an obligation if you lose an appeal? Comment 1: What options do you have to cancel your obligations?		x Rule 12.4.1 of CM rules (page 89)	Closed	No: (an appeal at this stage would be against eligibility which means that you don't have an obligation at this point)- Non issue
12	Rules for de minimis capacity, combining DSR generation etc. Comment 1: Where you have aggregated dispatch (eg 10 x 2MW units) would you want to avoid 2MW de minimis rules as the existing structures in place support aggregate dispatch		x [Section 4.2.2: Eligibility and pre-qualification]	STC	
13	How are transmission losses accounted for?	x Section 4.2.5.1		STC	Transmission losses are to be included in the target demand procured at auction, rather than taking account of losses in the capacity obligation.
14	Market dynamics – are we sure the arrangements will work to encourage new plant		x Points 394-400	STC	
15	Is DECC's approach of prioritising and pushing through all eligibility-related appeals in time for auction (ahead of de-rating related appeals) feasible?		x Section 4.2.2.8 (page 163)	STC	
16	What data is industry expected to provide in the data gathering phase			Closed	https://www.gov.uk/government/policy-advisory-groups/electricity-market-reform-emr-collaborative-development Please refer to notes of the workshop so far
17	Should there be a clearly defined set of rules around the data-gathering process? And will they be in a similar format to the information that Ofgem requires for its capacity assessment			Closed	https://www.gov.uk/government/policy-advisory-groups/electricity-market-reform-emr-collaborative-development Please refer to notes of the workshop so far
18	The agreed format of the "Pass over" to be specified			Closed	https://www.gov.uk/government/policy-advisory-groups/electricity-market-reform-emr-collaborative-development Please refer to notes of the workshop so far

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19	Guidance regarding data collection to be defined and provided to Industry			Closed	https://www.gov.uk/government/policy-advisory-groups/electricity-market-reform-emr-collaborative-development Please refer to notes of the workshop so far
20	There are places in the process where there is a feedback loop. Include on the process map how comments go back to DECC?	x		STC	addressed through process mapping
21	Request approval process to be defined.(point 8 of diagram)			Closed	addressed through process mapping
22	Resolution process needs to be defined			Closed	addressed through process mapping
23	What is actually published at the point of publishing the demand curve			Open	Implementation Plan to address this
24	Define 'Sufficiently Complete" with regard to the 'Handle a demand curve' reference point 11, and Handle an Auction ref point 1	x Reg 24.3 (p16)		STC	
25	Industry concern regarding the potential volume of opt-outs.		x Box 4.6	STC	
26	What is the opt-out process? What is the de-rating process? Comment: Policy issue potentially around the opt-out volume being higher than potential capacity that could be attained or achieved in the 1-year auction.		x Opt-out de-rating covered in section 4.2.2.7 (para 443) Opt-out process - Box 4.6 De-rating process Pre-qualification requirements 750-763	STC	
27	Auction guidelines and rules to be defined		x Article 18 of Electricity Capacity Regulations	STC	
28	Should DECC specify asset and corporate structure (example of BSC A signatories, noting that there are difficulties for new entries)? Relevant to registration windows Is this a 1-to-1 or 1-to-many company input (1 CMU for each generator in each generation unit?)		x Para 445 (page 160), box 4.17 (page 184) and rule 3.3 of CM rules (pages 25-26)	STC	
29	As part of Register a CMU Process need to define change of contact details process (also relevant to "Handle a Prequalification) Question over whether data should automatically roll over or needs manual input		x Section 7.6 of CM rules	?	
30	Submitting CMU applications Issue around chasing and prompting those who don't upload mandatory/appropriate documents – does this go to the appeals process? Helpdesk to deal with queries?		x Rule 4.2.2 of CM rules (page 40)	STC	
31	Regarding handling a pre-qualification RAD, how does data transfer happen?			NG	Rules require NG to develop online system for pre-qualification which is the data transfer. The implementation plan will set out when details of this systems, testing and log in details will be available to participants.
32	Should the CMU publication process be removed/delayed until after the appeals process has completed?		x Rule 4.5 of the CM rules (pages 41 -42)	STC	
33	Regarding the appeals processes, What is the format of appeals documentation?	x 4.2.2.8 Disputing the outcome of pre-qualification		Closed	Non issue: this is too detailed at this stage, it is not in consultation as this will be defined later.
34	In due course, the auction process may be amended to allow for zonal auctions	n/a (not a question) 4.2.3.4 Locational constraints		STC	
35	Will the demand curve be adjusted for DSR and, if so, in what circumstances?	x 4.2.3.1 Auction frequency		STC	
36	Will the amount of capacity held over for the year-ahead auctions be adjusted to take account of the results of the pre-qualification process?		x Point 457: Auction frequency	STC	Further details about the analysis will be published along side the Government Response.
37	How long will the auction process last - one day, or up to a week? Comment 1: international experience suggests that a one-day process should be possible, but industry participants expressed concern that this might not allow sufficient time for sign-offs. More time might also be early-on, to allow participants to become familiar with the auction processes. Can an auction feasibly work in the course of a day? Even using automation it will 'get messy' Unfamiliarity will be an issue particularly in the first round		x Rules 5.3.2-5.3.3	STC	DECC are working on this and will publish guidance in June -it does not affect the Rules/Regulations. Discussed at Expert Group.
38	What mechanism will determine the size of price decrements ("tick size")? Will the size of decrements be fixed or dynamic?		x Rule 5.3.7	STC	Please refer to Expert Group papers
39	To what extent will participants have options through the auction process?	x Rules for how bidders can act during auction are in 5.4		STC	
40	Will there be separate auction trustees, auction monitors and auction auditors?		x Rule 5.12	STC	On team Issues Log.
41	What information will price makers be required to submit in the "sealed envelopes"?		x Price Maker Memorandum defined in Rules (p16) and Price Maker Certificate, set out in Annex C of Rules	STC	
42	Should there be a mock auction? For example this could include imaginary portfolio/numbers but real CMUs			NG	There will be a Mock Auction, following pre-qualification. The Implementation Plan will set out when this will take place
43	How is it decided how many MW are procured in each auction round (both four years ahead and year-ahead)		x 4.2.1 Amount to Auction	STC	
44	Is it only DSR who will provide a bond?		x Box 4.10 (page 173)	STC	
45	What is the baseline capacity used for de-rating?		x Section 4.8.2 (paras 761 to 763)	STC	

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46	What options to industry have to cancel their obligation? Can it be cancelled if an appeal is lost?	Rule 12.4.1 of CM rules (page 89) refers. Issue duplication of Issue Id 11		STC	Covered in issue no. 11
47	What rating is used in the auction if the rating is disputed?	Section 4.8.2 (paras 757 to 763). Issue duplication of Issue Id 9		STC	
48	Clarity around credit ratings definitions and usage		x Replaced by concept of solvency certificate. Figure 4.19 (page 249)	STC	
49	Role of Auditor takes effect from when? Clarity around this role required		x Rule 5.12	STC	
50	Link to Issue ID 6. Timing of auctions to be ascertained. More time needed to understand the risks in order to avoid certain participants not turning up and 1st round not going ahead. If the first round is postponed, is there potential for pre-qualification to take place again		x Reg 24 (p16)	STC	
51	Rules need to be defined for setting new prices in an auction where there has been insufficient capacity offered, and the auction has not cleared.		x Reg 24 (p16)	STC	
52	Auction summary: If an auction has failed, at whose discretion is it to label it a failure If there is collusion for example, this could be a reason for failure, but does the Secretary of State cancel during the auction? Should gather feedback from participants?		x Reg 24 (p16)	STC	
53	Need to design and agree the process through which National Grid will gather data for and seek views on the assumptions which will underpin construction of the demand curve.			STC	Issue duplication of Issue Id 1
54	Need to define what analysis will be provided by National Grid for DECC to support the process for approving the demand curve.		x 4.2.1.5 Electricity capacity adequacy assessment	STC	On going policy work. National Grid is designing a process for the analysis on the amount of capacity to procure. More details will be published in the Government Response.
55	Which party has the obligation to register a CMU? Does the proposal that the obligation rests with the asset owner work in the context of complex corporate structures?		x Section 4.2.2.7 (para 445) and section 4.2.5.2 (box 4.17)	STC	
56	Have we correctly defined the data which applications need to submit through the pre-qualification process?		x Figure 4.19 (page 249)	STC	Details of this will come out from the design of the system
57	Determine the format of the Bid Bond process and requirements.		x Rule 4.6 of CM rules	STC	
58	Define the de-rating methodology.		x Section 4.8.2 (paras 757 to 763)	STC	
59	Determine the format of the information pack which will be made available to participants in advance of an auction.		x Rule 3.5	NG	The basis requirements are out in the Rules Ch2, and National Grid's interruption of this has been shared with E-UK. The Implementation Plan will set out when more detailed information on when access to systems will be available
60	To what extent should de-rating take account of TEC constraints		x Rule 3.7.3 (a) of the CM rules (page 32)	STC	
61	What is any scope is there for a participant to amend their pre-qualification application during the process?		x Rule 4.2.4 of CM rules	STC	
62	Is there any scope for a mass upload of data (as was carried out at the start of NETA)? Could National Grid pre-populate some of the data at the start f the process?			NG	This has been considered. NG cannot use any data it has access to in its role as SO for any purpose not permitted by the Tx License. Until Secondary Legislation has been passed, and change to the Tx License take effect, National Grid cannot use SO data for EMR purposes. As such, pre-population of data for pre-qualification is not possible. NG is looking to make the pre-qualification system available ahead of the pre-qual window. The Implementation Plan will set out details on timeframes for this
63	Seek clarification from Ofgem about the VOLL figure that Ofgem will use in cash-out mechanism		x Section 4.2.5.3 (pages 185-186) and article 13 of Electricity Capacity Regulations	STC	
64	De-rating expert group appeal mechanism		x Chapter 12 of CM rules refers (page 88)	STC	
65	Determine what DECC's 'proof' or check looks like to ensure that new build plant is on track and has achieved its milestone 12 months after the auction		x Rules 6.10.2 to 6.10.4 of the CM rules (pages 61- 62)	STC	6.10.1.C defines that
66	Contractual commitments and DECC timelines of delivery of refurbished and new plant 2 years ahead of delivery year. Concerns from parties that this timescale may not be appropriate. Definition of reburbishment includes financial expenditure thresholds on a kW basis; it also needs to be for the purpose of reduction of carbon. There may be a critical threshold for carbon reduction. Industry considers that 2 years ahead is too long. Further question on how one plans refurbishment given potential existing commitments.		x Box 4.9 (page 172)	STC	

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67	Refurbishment and newbuild definitions over time to provide clarity to industry		x Section 4.2.3.6 (page 171) and Chapter 1 of the CM rules	STC	
68	Industry asked what the appeal mechanism looks like for terminations. Information regarding timing etc. also needs to be clarified		x Condoc: Section 4 Para 724 to 726 CM Rules: Chapters 6 and 12	STC	
69	who is the settlement body/agent?		x (see relevant Expert Group paper)	STC	
70	Policy decision to be taken on when you can/can't physically trade in respect of both first and further delivery years - currently dependent on what year as to what proportion of your capacity is allowed to trade		x Box 4.13 (page 179 refers) Condoc: Paras 504 to 508 and Box 4.13	STC	
71	Process to be developed which covers the transfer from ION to EON through commissioning		x Rules 6.7 and 11.2 of CM rules	Closed	Non issue: there is an existing process for submitting and ION and an EON. We are using this process and only want to know when the CP has these.
72	Need to look at the equivalent of an ION for distribution connections		x Rule 1.1 of CM rules	STC	Please provide feedback through the response to the Consultation.
73	Question over level and type of posted collateral. DECC suggested that a collateral charge equivalent to 75% of the termination fee, which for a 500MW plant would be in "single figure millions". Would be held until 12 month point (ie for 12-13 months) and if the project failed at point 5, collateral would be drawn down. Industry participants considered that this could potentially be large and a barrier. Participants suggested this could be part of the process following sucessful tendering (after the auction) to reduce the financial burden.		x Para 755 (page 247)	STC	
74	How does size of second termination fee feed back into auction process to ensure that a sufficient number of participants are participating in each auction?	x (it goes into the Consolidated fund)		STC	
75	Once a generator has an obligation, they are never obliged to demonstrate that they are able to produce more than their de-rated capacity, but also has no ability to produce larger volume of capacity for a range of purposes. The workshop participants consider the concept of de-rating to be inefficient.	x		STC	
76	The legal and procedural processes regarding the auction instrument and capacity agreement need to be defined.		x Chapter 6 of CM rules	STC	
77	Which elements of the registry will be published? Who is procuring it/operates it/pays for it etc.?		x Chapter 7 (rule 7.7) of the CM rules	STC	
78	National Grid need to inform CP about timing of progress report regarding milestone plan (KPIs etc). What does "from time to time" mean?		x Rule 11.2 of CM rules and Para 742 of the condoc	STC	
79	How is lack of accuracy determined with regards to progress report regarding CP's milestone plan? Mechanism needed to prevent CP's from under-reporting. Milestones will have been specified in prequalification criteria.		x Rule 11.2 of the CM rules (pages 85 - 86)	STC	
80	What is the process for National Grid dealing with incorrect assertions?		x Rule 11.2 of CM rules and Para 742 of the condoc	STC	
81	What is National Grid's role in terms of their abilities to make decisions and determine what is an appropriate assertion etc.		x Rule 11.2 of the CM rules (pages 85 - 86)	STC	
82	What is National Grid judging against? National Grid are not the counterparty to the capacity mechanism so don't have a role to enter into contractual negotiations.		x Rule 11.2 of the CM rules (pages 85 - 86)	STC	
83	Change the diagram so that National Grid are able to review the CP's documentation for completeness, whether or not they submitted in time. Also, what ability does NG have to do spot checks at random times?		x Rule 11.2 of the CM rules (pages 85 - 86)	STC	We can check the new process map and update once they are ready
84	Milestone plan is submitted but exactly what should this plan be specifying? If the CP reports on time but reports that they are not to schedule, do NG accept/reject this; does an independent auditor review this/ what is the consequence of not behaving according to plan? what sanctions are there?		x Rule 3.7.2 of the CM rules (page 31-32)	STC	
85	what does 'handle' mean? Suggest that there are two things: 1. late with regard to milestones; 2. late with regard to submission of milestone reporting		x Rule 11.2 of the CM rules (pages 85 - 86)	STC	
86	To determine whether National Grid are responsible for monitoring whether all CP's milestones have been achieved, or whether it is the responsibility of the CP to report this.		x Rule 11.2 of the CM rules (pages 85 - 86)	STC	
87	Timing differences between end of CO and ability to collect LC subsidy needs to be considered		x Section 4.2.2.4 and rule 6.10.3 of CM rules	STC	
88	Who is responsible for updating the registry?		x Paragraph 710 refers	STC	
89	Can a feedback loop be built in here?			STC	
90	Clarify the relationship between de-rating and the capacity obligation. CP's may want to contract for less capacity obligations.		x Para 763 (page 250)	STC	
91	Payment notification information needs to be specified		x Section 4.6.2.1 and Chapter 7 of CM rules	?	
92	Process map to be updated to reflect most recent policy decisions.		x	Closed	Non issue: process maps are being looked at and will be updated as policy changes. [Handle a capacity provider]
93	If a CP converts a coal plant to a greener fuel at the expense of overall plant capacity, what happens where the CP is now only able to produce less than the obligated capacity? Is the CP able to 'top up' the difference using other mechanisms.		x Section 4.2.2.4	STC	

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94	De-rating considerations associated with subsequent conversion - how will these be handled?	x		?	Clarity on question needed
95	This process map should be more appropriately titled as "Handling a physical trade"	x		STC	
96	What does notification window need to be?		x 4.2.4.1 Physical trading	STC	
97	Subsume separate notification activity - joint submission? Should parties be able to jointly submit. Steps 5-11 can be included before step 2 by the two parties confirming and agreeing the trade, then jointly submitting to National Grid.			Closed	As per updated rules
98	Should the notification process be automated? If gate closure (gate closure assumes pre-qualification was successful) is less than 4 hours it will impact on physical trading.			NG	
99	What happens if a novation is rejected? There is a need to build in an appeals process if a novation is rejected incorrectly. Industry-led disputes committee to resolve disputes/hear appeals?			STC	Chapter 12.2 of rules
100	Need to consider how trade affects caps including at the portfolio level.			STC	
101	To what extent is a generator held whole in event of being constrained off. How can a consistent treatment be achieved between new plant with TEC less than CEC, and existing plant which is constrained as a result of eg weather-related events.		x Rule 14.2 of CM rules (page 97)	STC	Rule 3.6.3 refers to this
102	Can you pre-determine eligibility? - clarify		x	STC	
103	Where are financial trades captured? Financial trades are only known by the parties involved, as it is not relevant to National Grid. Should there be a publically available list of these financial trades?		x 4.2.4.1, Financial Trading	STC	
104	Consistency required around names of bodies involved with each process map	x		Closed	addressed through process mapping
105	Disconnection and bid-off need equivalent treatment	x	x	STC	
106	The registry needs to be defined in terms of component parts		x Chapter 7 of the CM rules	STC	
107	Market issue - Trading through common place (neutral) could be beneficial to industry, as it will allow more participants. Industry considered that this should be looked at from a policy perspective. The market (and not DECC) should decide on which platform a winner should be decided.		x 4.2.4.1 Financial trading	STC	
108	Need to consider interaction between balancing service and performance tests		4.2.5.2 Level of obligation in system stress events	IR	and STC
109	Need to determine how many periods are required for the test (10?)		x Section 4.2.5.6 (page 188) and chapter 13 of the rules	STC	
110	The 6 hour window before testing (irrespective of size/type of plant) was identified as being impractical by participants. Industry suggest that it needs to be based on a plant's dynamic parameters which a plant submits (ramp rates, min. on times etc.) otherwise there is a danger that plants might choose to appear "unavailable".		x Section 4.2.5.6 (page 188) and chapter 13 of the rules	STC	
111	What is CP's testing obligation if CP have traded out financially or physically. Initial policy review is that industry participants won't be tested if they have traded out.		4.2.4.1 Financial trading 4.2.4.1 Physical trading	STC	
112	Need to determine what the level of payment reduction will be if CP does not meet their derated level. The rule for determining payment is to be defined, for example could it be dependent on how far away CP were from reaching their derated capacity?			STC	
113	Should testing reflect the way that e.g. ambient temperature affects station output.			STC	Derated capacity has to be delivered
114	CPs must be able to prove that they are able to deliver the maximum volume of their derated capacity. Industry participants considered that tests might be better focused on a load following basis rather than maximum. (In the summer demand won't be there to reduce through demand side response).		x Section 4.2.5.6 (page 188) and chapter 13 of the rules	STC	
115	In the situation where a CP is unable to meet derated capacity requirements what mechanism exists, either through this process or another process, to agree that the maximum capacity actually achieved is the appropriate test capacity. Should there be merit appeals on de-rating?		x Rule 13.3.8 of CM rules	STC	No proposed merit appeal for derating capacity.
116	Does the testing regime undermine the prospects of financial trading?	x		STC	
117	What happens if only part of your plant was operational - will that year be used for pre-qualification testing. Or will years only be counted if the plant was fully operational?		x 4.2.5.3 Penalties	STC	Addressed through the revision of the penalty regime.
118	If CP can demonstrate derated capacity before spot test happens then requirement for spot test should drop away.		x Para 539 (page 188) refers	STC	
119	What are the routes by which industry and other parties can propose a change to the rules or regulations? Suggest that the process map is revised to show the different entry points and that a proposed change to the rules or regulations may be suggested by anyone		x Condoc page 225	STC	
120	Industry suggested a permanent panel should be in place to support in the initial assessment (and subsequent stages of the change process)		x Condoc page 226	STC	
121	Market participants are not part of Ofgem and thus this point on the process map should sit outside of Ofgem's remit		x Condoc page 225	STC	
122	Should the rule/reg change process mirror code processes such as CUSC, as there are potential downsides to only allowing for Ofgem to administer the rule/regulation change process? Also helpful to point to industry how frequently changes to the rules and regulations might occur.		x Condoc page 225	STC	
123	Is point 35 the only place to enter a proposal for rule changes, ie is point 33 redundant in which case it should be removed form the map?		x Condoc page 225	STC	
124	Concern raised regarding the inability to appeal to Ofgem regarding decisions whether to take proposed changes forward other than through Judicial Review. Policy decision to be taken as to whether additional appeals required		x Condoc page 225 and consultation question CM76	STC	
125	Does the consequential licence change then trigger a pre-existing licence change process?		x Confirmed during Collaborative development	STC	
126	change wording to 'Will SoS want to change the Rules'? Can criteria for situations for what powers and circumstances SoS would want to change the rules be developed and shared with industry. Refine process map.		x Confirmed during Collaborative development	STC	

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127	From point 8 it makes sense for point 8 to link to an earlier point in the review such as point 36		x Confirmed during Collaborative development	STC	
128	At this point, DECC should consult with Ofgem over potential consequential rule changes. Additional decision box with optionality for a yes/no decision for point 14 separate to point 15		x Confirmed during Collaborative development	STC	
129	Participants concerned that if an expert panel was not required, then industry would not have an opportunity to input. Further, there is little opportunity for industry to appeal the decision if not involved other than through Judicial Review.		x Section 4.5 Institutional and governance arrangements	STC	
130	Link point 32 to point 35		x Confirmed during Collaborative development	STC	
131	Further clarification and finalisation required as to the role, aims and objectives of the Rule Administration		x Condoc p225	STC	
132	Industry participants commented as to whether regulations and rules should each have their own change processes within each document		x Condoc p225	STC	This is a workstream (on-going policy work). The process maps should be different. DECC will own the first version of the rules change process until the first auction and Ofgem will own the process following that. Ofgem will go to public consultation in Q1 next year to consult on the process.
133	When the auction occurs on a year ahead basis, does DECC regularly consider whether to also hold a 4 year ahead auction? Would this be included as part of the delivery plan?	x		STC	The amount of capacity to auction is set by Ministers based on advice by National Grid. If analysis indicates that no capacity is required from the Capacity Market in a given delivery year then an auction would not be held. This decision would be taken following the delivery of National Grid's advice in spring of each year. In practice, we anticipate that we will continue to need capacity from the Capacity Market and would expect to hold a T-4 and a T-1 auction every year.
134	Full list of documents that DECC/NG require of industry participants should be set out in order for industry to plan			STC	Addressed by Rules and Implementation plan
135	Ofgem would be expected to gather views from stakeholders as to how they have performed during the year - additional step required on the process map between the current step 5 and step 6			Closed	Addressed through the process mapping
136	DECC to take a decision as to whether a market monitor is required and to provide a report after the auction each year in order to feed in to Ofgem's annual report. NG would appoint a market monitor to report on the auction.		x Condoc Section 4.2.3.3	STC	
137	contribution of information from NG to Ofgem to be defined			NG	
138	Timing of this step to be defined. Issue further detail on the timing of the process to provide clarity to industry participants			NG	
139	Consistency regarding naming conventions (Delivery Body v NG etc.) to be considered			STC/ Closed	Addressed through the process mapping
140	The box entitled 'Ofgem and National Grid' should just read 'Ofgem'			Closed	Addressed through the process mapping
141	Are VoLL and CONE set out in the regs or rules? Do you change the reliability standard in this case? Clarity over the relationship between VoLL and CONE required.		x Article 13 of Electricity Capacity Regulations refers to VoLL	STC	
142	Industry need a timeline to see where publications will be made by parties so that industry has time to respond with internal decisions etc. in advance of pre-qualification		See Article 48 of Electricity Capacity Regulations	STC	Chapter 2 of Rules, Implementation Plan
143	Group discussed penalty impacts of CMU producing over its derated capacity in advance of CMW. For example, if derated to 50%, and operating at 100% beforehand, and the operator drops to 75%, there is a penalty liable. The obligation is the FPN when the notice is given, after 4 hours from stress event warning. Don't want system to deteriorate just after capacity market warning. For embedded plant without an FPN, an FPN equivalent will be estimated.		x Section 4.2.5.2 (paras 519 - 520)	STC	
144	Relationship between CMU penalties and soft and hard caps which are portfolio caps which will need to be clearly specified. Particularly around netting off between the two.		x Section 4.2.5.4 (page 187) and chapter 14 of the CM rules	STC	
145	If I am a generator where part of the market rules have been suspended, what happens with respect to the capacity mechanism in that region?		x Paras 523 and 524 (page 185)	STC	
146	Want to ensure no contradiction between NG instructions and DNO transmission/distribution operator instructions. Want to ensure no conflict of incentive in these instructions as compared to capacity market		Para 512	Closed	Existing NG licence prevents them from doing this.
147	Hypothetical events such as a generator tripping during a stress event, leading to additional stress captured? What are the penalties involved in more complex scenarios? Also particular issues around CCGTs at a local level ramping up at particular rates at particular times of year		x Rules 8.4 & 8.5 of CM rules (pages 70 - 77)	STC	
148	How is the end of a stress event notified?		x Rule 8.4.6 (page72) of CM rules refers [Box 4.16 in Condoc]	STC	
149	To determine market share, a methodology needs to be published. Current view is that NG forecast system demand. At the appropriate point, suppliers provide their forecast which would be used to determine market share. Suggestion to use ROCs market share data. Settlement runs as per existing BSC timetable. Concern raised by industry that if a supplier has good DSR, will avoid some of the charge. You won't know until three years later what the actual charge was. DECC commented that there would be incentives on suppliers to forecast accurately. What would this incentivisation be? Particular concerns around it being peak demand, and underreporting. Also that DSR is being paid twice for the same thing through CM and through DSR.		x Para 622-625 & para 646, Question CM55, CM66	IR	

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150	Query on how the methodology for pass-through to customers occurs. Firstly on whether it's £ or £/MWh. DECC current position is leaving it to suppliers to charge to customers the rate. Paying a tax as a supplier - so is likely that there may be specific rules around how suppliers may pass through the costs. Industry would like clarity around any rules regarding pass through, and recommend reviewing whether payment is on a £ or £/MWh basis.	x		STC	
151	DECC advise that it will be a regulation to provide an appropriate forecast. Industry suggests that it could be more powerful to apply as a licence condition.	x		STC	
152	How are new entrants accounted for after the forecast charges are worked out? Eg if enter market on 1 October, won't know until end of February as to whether you have charges. Avoided charge until that point. From a point of competition and risk this could be a large issue.		x	?	Clarity on question needed
153	Could be additional clarification around payment shaping and smoothing as industry participants currently unclear. Particularly around DSR and how the cashflow of this works in terms of charging.	x Para 605, page 204, Para 619 page 208		STC	
154	Concern about the level of over-delivery payments that could be liable by suppliers, particularly given penalties aren't deducted. This could be a working capital issue particularly for small suppliers. Given the flow between generators and suppliers (fund overdelivery payments to capacity providers by first getting funds from suppliers. Also penalties provide a stream of cash. Generators make payments in arrears.) Propose to develop some 'journeys' to show scenarios with industry volunteers		x Over-delivery, para 536-538	STC	
155	Concern about where generators go out of business. No 'generator of last resort' concept so there is a shortfall in cash. There is also an associated issue of credit security, particularly in an event where all participants overdeliver and noone is penalised.		x Over-delivery, para 536-538	STC	
156	currently no dispute option on this process map, where for example a bill is received at the incorrect expected value. DECC expects that disputes around payment would broadly sit in three categories: 1 .BSC data incorrect, which would be addressed at BSC. 2. Dispute against data provided by SO in terms of system rules, which would go to Ofgem. 3. Settlement agent has incorrectly set out something, this would go to the Settlement Body or be raised to JR. Industry considered that if this is a tax would issues be covered off in accordance with HMRC requirements/legislation?		x Section 4.6.2.4 (page 233)	STC	
157	If there are changes in market share, then under and over-recovery will be particularly important. This is of particular regard to credit requirements, for example that suppliers are underprovided as they have underforecast. This could be of particular concern in the case of default. Industry are concerned by the impact of other suppliers on those suppliers' actions, particularly in circumstances such as smart metering, where actuals are known for a proportion of the suppliers population during the year.		x para 622-625 & para 646, Question CM55, CM66	IR	
158	Compare monthly and daily impact of credit settlement as industry concerned about interest requirement and impact on working captial position. Industry considers BSC already sets out requirements on a daily basis. Alternatively, existing power billing is approx 22/23 of each month, could be more consistent with current rules.		x Figure 4.16 and questions CM59, CM62	STC	
159	Concern that the suspension of a supplier, and the breaching of the supply licence is far too onerous a penalty as a result of missing a month on month payment. A softer option is required. Further, industry participants do not consider that they should suppliers bear costs of failure that they have no influence over. The BSC current situation, for example, has sufficient funding in place such that were SOLR arrangements are implemented, mutualisation is not required.		x para 647, 651-652, question CM67	STC	
160	update process map to show that suppliers are repaid		x [process map]	Closed	Addressed through process mapping
161	Query relating to how issues between years are accounted for. There are a number of factors such as levy rates which in any given year are related to different years. Please clarify all details of what factors are relevant for that year and for subsequent/previous years. Note that there is some crossover with decisions from CfD. Query over how reconciliation payments at each invoicing stage occurs and whether this is quite complex. Reconciling actual peak demand market share and financials each month.		x Reconciliation, para 657-659, question CM71]	Closed	Covered in rules and regulations- there is no further policy issue. There will be an explanatory note to the regulations if needed (see page 30 of Regulations).
162	Concern from industry regarding the central netting off of over-delivery payments which disadvantages suppliers as compared to generators. From a policy perspective drawn up this way in order to encourage secondary trading. Industry considers that transparency of cashflows relating to under and over delivery should be separate, rather than netting of and creating a monthly cash call on suppliers. Further, this is on a month by month basis. This could be minimised by having a very low penalty rate.		x Over Delivery, para 168-170	STC	Work is being carried out on the penalties and is being addressed through papers to the Expert Group.
163	Can do a financial trade with any party, but only parties with a CA will be hedged in terms of overdelivery payments - noted by industry participants	x		STC	
164	Clarification sought over the circumstances and calculation for over-delivery payments (query related to portfolio load following obligation in particular, with regard to the warning process as well as the cashflow process)		x Section 4.2.5.5 (page 188)	STC	Chapter 14 of the rules: calculation of penalties and over delivery charges.
165	Participants considered the situation that may arise where there is overdelivery but still a short-fall in funding. Complex design concerns. DECC response that without overdelivery financial trading is less likely to happen.		x	STC	Section 4.2.5.5, paragraph: 536-538
166	Issue discussed that for any given settlement period, stress event warnings should only take place between T-8 hours and T-4 hours, as the current system sufficiently covers other time periods. Given the penalty regime, if warning too long a time in advance of a settlement period, a revenue maximising strategy would be for participants to reduce production so that they can ramp up during the period. Additional comment that plant where there are multiple units of which some are offline, participants might be incentivised to make particular actions. Concern that stress event notifications will occur too frequently.		x Section 4.2.5.2 (paras 519 - 520	STC	
167	Definition of MEL (maximum export limit) should be clarified in the context of the capacity market		x Rules 8.4.7 and 8.4.8 of the CM rules	STC	page 13 of rules defines MEL
168	On change control, want to be able to change policy relatively quickly given the potential for industry participants to behave in unexpected ways. If a BSC type change control process is used, then urgent changes can be implemented in a matter of days, rather than potential months if DECC ministerial decision is required		x Section 4.5	STC	

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169	Need to confirm what the definition of the stress event notification in relation to each settlement period. Participants suggest that the stress event would relate to the current settlement period. Suggest at washup go through example daily timelines of how in practice each stress event notification process work occur.		x Confirmed during Collaborative development	STC	
170	Definition of a baseline PN - will it be 4 hours before, or declared as the time when the warning was issued?		x Rule 8.5.1 (page 73) of CM rules	STC	
171	Planned v actual DSR delivery - distinction is important. whichever calculation used for penalty calculations will inevitably have some level of inaccuracy. Industry note that they would try to overdeliver in order to avoid penalties no matter which DSR calculation used.		x Section 4.2.5.2	STC	
172	How will NG signal to opt-out plant (plant that would be eligible for CM but has chosen not to participate) various ongoing updates? Participants raised particular concern where opt-out plant trips, increasing the load following obligation of plant that has opted-in as demand is net of opt-out plant. NG notes that most information is available it is just a matter of publication and formatting.		x Rules 8.4.7 and 8.5 of CM rules	Closed	Non issue: NG will publish to opt-out as in to opt-in. There will not be anything specifically signalled to opt-out.
173	How NG publishes the warnings should be defined and agreed. Industry considered a multi-route approach should be taken, with potential for confirmation of receipt by participants. Should also tie in with Ofgem Cash-out SCR methods. Suggested creating some 'day in the life' scenarios to set out dynamic system parameters, and how CM, National Grid Code rules and Ofgem Cash out SCR rules will interact.		x Box 4.16 (page 183) and rule 8.4.7 of CM rules	STC	
174	Discussion around scenarios for triggering a stress event where payments could apply, and whether it would be possible for NG to declare a stress event that is subsequently determined to not be a CM stress event, with potential for industry participants to take actions to avoid penalties and overdeliver, but then it is determined after the event that it was as n't actually a stress event. What retrospectivity in decisions as to the status of stress events is possible?		x Confirmed during Collaborative development	STC	
175	Settlement data access query - how, what, who has access etc.		x Section 4.5	STC/ Colsed	The Regulations state what settlement data is available to the SA. Changes to the BSC will go through the Change Control process managed by Elexon.
176	Consider possibility of rolling notification periods to remove requirement of cancellation in the case where an ongoing stress event is occurring. Query over whether the market restoration signal should be more mechanistic (perhaps similar to NISM) than the current arrangement for it to reset at midnight.		x Box 4.16 (page 183) and Rule 8.4 of the CM rules	STC	
177	Notice of closure should also notify CPs		x Rule 8.4.7 of CM rules	STC	
178	Issue raised regarding the rationale regarding portfolio caps being applied at a portfolio level. Noted that it is to be proposed as is in the condoc, however industry participants noted the example where portfolios could have vastly differing penalty impacts.		x Box 4.17 (page 184)	STC	
179	DECC to confirm the parameters over which exposures would be in order to hit the penalty cap, with examples. Under the circumstances of one unit stopping working in particular, with other units then supplying at higher levels, how do overcapacity payments work?		x Confirmed during Collaborative development	STC	Will produce worked examples
180	Unintended consequences of cash out compared to CM. Incentives driven by cash out, but there are clear linkages, where operators need to decide how to operate plant under a range of complex decision trees (spill v sell). Makes it more expensive for a CM unit to sell than a non-CMU as there are more complex choices in deciding to be a CMU. The level of complexity introduced to trading decisions as a result of these arrangements should be considered by policy-makers.		x Para 531 and Rule 14.3.2 of CM	STC	
181	The VoLL figures for cash out compared with the CM drive incentives. Can the parameters such as VoLL be changed between the period prior to the auction when participants price their risk and delivery? Risk regarding finance and acceptability to banks if the parameters of the CA can change.		x Article 13 of Electricity Capacity Regulations	STC	No: it cannot be changed during delivery years, it is set at what it was at the time of the auction.
182	Penalty rates further discussed in terms of a barrier to entry. Penalty is capped at annual payment. DECC commented on expert paper that will shortly be published to look at a range of penalty rates as compared with penalty caps and their impacts.		x Section 4.2.5.3 (page 185-187)	STC	
183	With particular regard to 10 year contracts, the market may not have an incentive to deliver while that single player does. Particular concerns raised by industry that where it is a new entrant who is not part of a portfolio, then industry participants are concerned about a lack of cohesiveness for this plant compared to the rest of the market.	x		STC	
184	Change process map naming convention to change 'lead time' to 'CMW notification period'	x		STC	
185	Should the adjusted load following obligation calculation be ex post or calculated in advance? Note that this is a query that has been raised in expert groups. A number of scenarios were discussed where overall capacity was turned up or down and the impact on obligations. Question as to whether non-CM capcity should be included or not within the overall system calculations. If the aim is to protect consumers, then ok if a little excess capacity is on the system.		x Section 4.2.5.2 (page 183-184) and rule 8.5.3 (page 74) of CM rules	STC	
186	FPN position would reflect a number of parameters, but industry raised particular concern regarding limitations on ability to run. Where the generator is unable to run as a result of circumstances that they are unable to do anything about, the penalties would not be liable etc.		x Paras 523 and 524 (page 185)	STC	
187	Concerns from industry where CMW is posted, but no stress event occurs; as a rational response majority of industry participants will turn up load in order to avoid penalties. Likelihood that NGC will be turning down a lot of plant, with associated cost. Ratio of CMWs to stress events may be high.		x Section 4.2.5.1 (page 182) and Rule 8.4 of CM rules	STC	
188	Day in the life of a stress event and warning scenarios should be developed, particularly around where PNs are feasible and deliverable under a range of stress situations, and the impact on generators of their load following obligations. May be creating a set of penalties where it is unfeasible to trade despite signals to dispatch		x Confirmed during Collaborative development	STC	

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189	Query raised regarding the gas system in emergency conditions and the impact of force majeure on the electricity system. If an FM event existing alongside a system stress event, there could be a 'slippery slope' of FM exectptions so the DECC policy decision to date has been to exclude. Industry recommend that a clear definition of a force majeure event is is published by DECC.		x Paras 523 and 524 (page 185) and rules 8.4.2 and 8.5.1 of CM rules	STC	
190	BMUs face particular challenges in terms of traceability of generation at sites including BMUs and how they are accounted for. For example where a trading site has a production BMU of 1000MW and a demand BMU importing 100MW, then the FPN and export metering for the production BMU would be 1000MW, however credited energy TEC and meter aggregation rules for settlement would be based on the net 900MW. Clarification as to how the trading sites are treated are needed. Where does the obligation sit? on the 900MW? The de-rated capacity shouldn't preclude the possible range of output. Concern that there is no consistency across the CMW notification and the post 4 hour period. Additional comment raised regarding whether it ramps up or down in the PN period what is the impact?		x Section 4.8.1 (pages 244-246) and articles 4 and 5 of Electricity Capacity Regulations	?	
191	Request by participants for DECC to make and publish some examples of how calculations for the soft cap occur, for both individual CMUs and for portfolios. One scenario request for z value changing between auctions.		x Z factor specified in article 13 of Electricity Capacity Regulations; Covered during Collaborative development	STC	On-going Policy Work
192	If z factor will change after auction, there are significant impacts on portfolios. Please confirm.		x Article 13 of Electricity Capacity Regulations	STC	Discussing about including it in legislation
193	What is the mechanism for disputes on this process map? Query as to whether the current policy of dispute resolution regarding settlement - a more informal route prior to the formal dispute process. Would prefer to have an initial process with timescales for responses for queries regarding bills etc.		x Section 4.4.5 (page 217)	STC	Covered in rules and regulations, also in the Consultation Document- ref provided.
194	For CMU definition where for each category where generators optout and either want to close or don't want to be operational in that delivery year,DECC considered that an explanation is required by the generator. Participants did not consider that this commercial informaiton was appropriate to be shared		x Box 4.6 (page 154) and rule 3.10.2 of the CM rules	STC	
195	Participants considered that the expert group paper did not sufficiently clarify the physical definition of a CMU. For example, Is the export capacity unit gross or net of station load? Plus addition issues for DSR		x Section 4.8.1 (pages 244-246) and articles 4 and 5 of Electricity Capacity Regulations	STC	
196	Regarding definition of a CMU: if you have a CCGT with multiple gas turbines and steam. May choose to operate only one or some of the gas turbines. This is difficult to operate under the current definition of a CMU.		x Section 4.8.1 (pages 244-246) and articles 4 and 5 of Electricity Capacity Regulation	STC	
197	Regarding portfolios, participants considered that rules used in CUSC could be applied to the CMU when considered ultimate parent company and legal and licence responsibilities and obligations. There are a number of associated issues around who the responsible parent company is - suggestions that this may be different for different things, particularly where regulatory powers are requiring a UK-based business to be responsible.		x Box 4.17 (page 184) and rule 3.2 of CM rules	STC	
198	In determining the demand curve, participants thought that a worked example would be helpful		x Figure 4.5 Illustrative Demand Curve	STC	As part of the on-going policy work an example could be included in the Government Response.
199	During auction – participants raised that NG would have limited information has to how much to reduce prices each round when reducing prices during the auction, as they are 'blind' to companies exit price until after they have set a lower price than the exit price. This might affect the overall capacity level offered if the curve is steep.			STC	Government working on this issue. It is already covered by Issue 37 above. Also being discussed at Expert Group and Project Board.
200	If you are within the BSC, you get VOLL - cash out penalty. If you are outside, just VOLL. Trading dynamic/incentives are different are different depending on situation. Participants considered that the incentives are such that generators would only result in trades within each 'side', rather than across (between inside and outside the BM). So trading is more limited than participants anticipated.		x Para 531 (page 187)	STC	
201	Rules around force majeure and failure in the transmission/distribution networks are currently complex and will require a lot of definition by NG. Rules to be defined		x Paras 523 and 524 (page 185) and rules 8.4.2 and 8.5.1 of CM rules	STC	
202	Under current policy opted out parties cannot participate in secondary physical trading. Industry participants consider that it could be useful for trading across all parties		x 4.2.4.1 Physical trading	STC	
203	A statement to clarify penalty cap obligations would be helpful. Cap would be based on the clearing price at the auction.		x Section 4.2.5.4 (page 187) and chapter 14 of the CM rules	STC	
204	Spot testing is not looking at availability, it is confirming that a CP has the capability to deliver. NG consider that testing intent is to give comfort that in years where there are no stress events. Industry concern that if testing is not at maximum capacity, then there is potential for DECC to change derating based on that test. Should either test at max derating or not threaten to change derating based on test		x Section 4.2.5.6 (page 188) and chapter 13 of the rules	STC	Penalties regime is being reviewed
205	What are the conditions for sale of a CMU before the auction?	x		STC	
206	If an ownership change halfway through a delivery year, how is the cap (calculated based on ownership) adjusted? There would be a requirement to notify DECC, and the cap would have to be updated. If the cap has already been met but then the asset is sold to a larger portfolio does the cap increase?		x	STC	Rules Ref: 9.4
207	How much capacity is to be held aside for the T-1 auction. DECC are still to work the figure out (possibly 2GW – too low?). If it is 2GW then industry participants considered that this incurs significant market risk		x Paragraphs 403-404, 458	STC	
208	In terms of secondary trading, can a single party trade with multiple other parties?		x	STC	DECC should clarify this in next round of draft legislation.

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209	Industry considered a strong need for the ability to run prequaliification and auction training 'sand-pits' for industry in advance of the first auction.		Process	NG	The Implementation Plan will set out when pre-qualification systems and support will be available, when the auction sand pit will open and when the mock auction should take place
210	Binary decision for participants to bid in either T-4 auction or T-1. More certainty for both types of participants if the Transitional Arrangement funding is available. If you are participating in the 2014 auction, DECC assumes that the DSR is sufficiently sophisticated that it would not need TA payments. Industry considered that this would not be appropriate as the 2 year payments would allow T-4 participants to grow during this time.			STC/ Closed	
211	Query as to how we define nameplate capacity for DSR.		4.3.1.3 De-rating DSR	STC	Reference in conduc '4.3.1.3 De-rating DSR'
212	NG sought feedback from industry as to whether their de-rating figure should be based on availability or performance. The issue for individual parties is that they need their individual processes to be accounted for in the obligation requirements, rather than taking an average or portfolio approach.		Issue 1 - information to create DSR de-rating figure; Section 4.8.2 (paras 757 to 763) refers Issue 2 - individual -vs - average performance; 4.3.1.3 De-rating DSR	STC	DSR only
213	Using 2MW as a maximum size for DSR participants raised some concern for the small level of this, given the 2MW de minimis in generation. DECC responded with gaming issues, and NG asked the floor what level would be appropriate. Request from industry to make the maximum the same as the DSR licence limit.		x	STC	Limit has been removed from rules.
214	Query from participants as to whether committed STOR would be a preferred measure of availability? Or to base DSR participation on other worldwide examples?		As per Issue Id 212	Closed	
215	Participants considered that DSR testing should be on the same basis as generation. Industry preferred it to be as per load following obligation		x Section 4.2.5.6 (page 188) and chapter 13 of the rules	Closed	
216	What is the prequalification requirement for embedded generators that are connected at DNO level that would need a connection upgrade in order to participate in the market? What consideration is given for this as part of DSR in terms of offsets that are given to generators? It should be comparable.		x Paragraphs 558-564	STC	
217	At the auction, what level of capacity you can bid in relative to the CMU capacity? DSR participants would potentially like to be able to bid less capacity than CMU requirement from pre-qualification.		x Para 763 (page 250)	STC	Rule 2.3 and 3.5.5
218	Consideration should be given to the penalty regime for generators and equivalent rules should be in place for DSR - ie if a DSR prequalifies and opts in but does not bid at auction, are the penalties equivalent?			STC	
219	Concern from generators that DSR is 'self-derating' after prequalification and after the Capacity Agreement has been signed based on a CMU with particular technical characteristics is not in keeping with the principles of the CM and balanced risks between generators and DSR. While the bid bond is an additional 'extra' to get additional certainty in delivery, and to not inflate what they are able to deliver.	x		STC	DSR is able to increase its reliability by backing off additional resources in a unit. Any additional resources included would still need to be funded from the same capacity payments, therefore consumers receive at the least the resource they paid for and may in reality receive a more reliable one. DECC does not consider this to be a issue.
220	The Pre-qualification process map shared at the workshop included a matrix setting out the criteria for each application type. Additional clarification on which criteria are relevent for DSR is required.		x Figure 4.19 (page 249)	STC	
221	If not entering the auction, a trigger for returning bid bond required		x Credit cover requirements for DSR, Points 568	STC	
222	Can a bond be renewable (e.g. every 6 months) as opposed to full priod? The former will be the cheaper to secure.			IR	
223	who do the bid bonds go to if they are sacrificed? Assumed some particular circumstances related to tax status however industry would prefer clarity		x Credit cover requirements for DSR, Points 569	Closed	They will go to a Government consolidated fund- not to the industry. Correct Ref: 569 of the Consultation Document
224	Clarity required on partial delivery - ie if DSR partially deliver, be partially funded, should the obligation also be scaled down, and should the proportion of bid bond received change. Generators note that to be equivalent to the bid bond side, equivalent thresholds should be encountered (if at least 80% created, gets 100% bid bond). The goal should be to avoid mismatches across participant types.		x Condoc ref 4.3.1.2, point 570	STC	
225	testing requirements and parameters on DSR to be confirmed given time consuming nature of testing small units		x 4.2.5.6 Spot testing 4.3.1.4 Testing DSR	STC	Units will be spot tested at a unit level. The removal of the aggregated unit size maximum of 2MW allows larger aggregated units to be entered, reducing the time burden on providers of managing many separate units.
226	There are two routes for CM metering data to go. In some circumstances the data provider can take that data, however, may not always occur. Where data cannot go through the settlement process, the data collector, the MoP and other parties will need alternatives.		x 4.3.1.5 Metering DSR	STC	
227	Many industrial and commercial customers see imbalance directly (dependent on contract) through cash out. This may change and has impacts on the penalty regime as CM develops. Given sufficient notice, the supplier can include it within contracts.		x Paragraph 531 (page 187)	STC	