

Capacity Market consultation – improving the framework: proposals

1. Government proposes to amend the regulations so that the capacity market supplier charge is collected based on gross, instead of net demand.

1.1 The costs of the Capacity Market (“CM”) are levied on electricity suppliers, who in turn recoup them from bill-payers, according to the supplier’s share of total demand between 4pm & 7pm on winter weekdays. The basic principle is that those who use more electricity should pay more of the costs of ensuring that electricity is available, and this is measured by the demand that they place on the transmission grid. But suppliers can contract to obtain some electricity not from larger generators connected to the transmission grid but from ‘embedded’ generators (i.e. smaller generators connected to the lower voltage distribution network). By meeting some of their electricity needs this way, the suppliers reduce the demand they place on the transmission grid and thus pay a reduced share of the supplier charge costs of the CM – with someone else having to pay more. Suppliers typically pass on most of this saving to the embedded generators. The value of this saving varies relative to the overall costs of the CM, but was around £15/kW following the 2015 auction.

1.2 One of the intended benefits of net-charging was to incentivise generation over peak periods in order to reduce demand, and so reduce the amount of capacity that needs to be secured through the CM. However, where the majority of the capacity incentivised to behave in this way also holds capacity agreements, this effect is unlikely to be realised as their generation cannot be factored into demand estimates.

1.3 Some stakeholders have raised concerns that the current arrangements offer embedded generators the opportunity for ‘double payment’ – revenue from holding a CM agreement and revenue from suppliers benefitting from reductions in their supplier charge – giving them a competitive advantage and potentially distorting the outcome of capacity market auctions. Net charging may also be causing inefficient despatch decisions, where small embedded generators are displacing larger more efficient capacity. Net charging also has a distributional impact; suppliers of electricity customers who are less able to respond to time-of-use signals – particularly domestic customers and SMEs in the short-medium term – face an increased share of the capacity market costs.

1.4 Where a policy has potential to over-reward market participants and distort the market then it is appropriate that Government should take any necessary action to address this. Amending the supplier charge so it is calculated based on gross demand should address any potential distortions and bring the CM in line with the Contracts for Difference supplier obligation levy. The proposed change is also consistent with the direction of travel of Ofgem’s ongoing review into whether embedded generation¹ is getting an unfair competitive advantage from the transmission charging regime more generally.

1.5 We are not proposing any further changes, e.g. in relation to the time period used to calculate supplier demand. DSR (including behind-the-meter generation) will remain able to benefit from the supplier charge where it can reduce demand at the meter point.

¹ <https://www.ofgem.gov.uk/publications-and-updates/open-letter-charging-arrangements-embedded-generation>

1.6 The Electricity Settlement Company (“ESC”²) settlement costs levy is also currently collected on a net demand basis. To maintain consistency between this and the supplier charge, we propose that the settlement costs levy should also be amended so it is calculated on a gross demand basis. To note, BEIS is soon to consult separately on the ESC’s operational costs for 2017/2018, which are recouped via the settlement costs levy.

Grandfathering

1.7 Some stakeholders have suggested the Government should introduce grandfathering arrangements in relation to any capacity that secured an agreement in either of the first two CM auctions and expected a benefit from the supplier charge.

1.8 The Government recognises the challenge to investors in absorbing changes to revenue streams that they may have factored into business cases. However, to the extent that an investor/CM participant assumes a future revenue as a result of embedded benefits from a CM levy, they ultimately do so at their own risk; and as such they should factor in the possibility that this levy could be subject to change in future and discount it accordingly, as with other variables that an investor needs to consider.

1.9 The Government does not, therefore, propose to introduce grandfathering arrangements.

Timing of introduction of changes

1.10 Government is interested in views on when any change from net to gross charging should be brought into effect. For instance, any changes could be timed to coincide with any changes to the TNUoS embedded benefit, where Ofgem is considering transitional arrangements.

2. Government proposes to apply the delivery milestones set out in the table below to the T-1 auctions³.

2.1 A number of the delivery milestones currently set out in the CM Rules do not work in the context of a year-ahead auction. They were designed with a T-4 auction in mind and consequently several of the milestones would not apply until well into the T-1 delivery year (or even after it had finished) which renders them useless.

2.2 The proposals below will truncate the existing delivery timetable to ensure that all milestones are completed before the start of the delivery year, with any appeal process resolved a third of the way into the delivery year. The delivery milestones relating to the T-4 auctions will remain unchanged.

2.3 We consulted upon, and subsequently adopted, a very similar set of milestones to those proposed below for the early Capacity Auction⁴.

² ESC is responsible for transactions relating to the CM, including making capacity payments to capacity providers, recouping the costs of the CM from suppliers, controlling collateral and managing auction bid bonds.

³ Note that prequalification for T-4 and T-1 auctions will run concurrently, so whatever deadline for prequalification applies for T-4 will also apply for T-1

Stage	Milestone	Date
A	Prequalification (planning permission, extended years criteria, capex, construction plan)	4 months <u>before</u> auction
B	Financial Commitment Milestone; failure equals termination at Termination Fee 4 (TF4) rate (£15k/MW)	3 months <u>after</u> auction
Start of delivery year - 1st October 2017		
C	<p>Extended Years Criteria test; failure - term reduced. Must achieve substantial completion milestone to start receiving CM payments</p> <p>Unit is >90% operational ('Significant Completion Milestone') by start of delivery year (DY), agreement & payments start on 1st day of DY.</p> <p>Long stop date (<u>LSD</u>) is brought forward to 1st October.</p> <p>Unit is <90% but >50% operational by LSD, agreement & payments take effect from LSD at % of operational status.</p>	By start of delivery year
D	<p>Minimum completion requirement (>50% operational); failure – TF5 (£35k/MW)</p> <p>Units <50% operational by LSD issued with 'Notice of intent to terminate' (rule 6.8.2) & given 1 month cure period to achieve >50% status.</p> <p>Units <50% operational after expiry of 1 months cure period – termination notice issued (will terminate in 3 months).</p> <p>Applications for an extension will not be permitted.</p>	By start of delivery year
E	End of cure period, Termination notice issued	1 month <u>after</u> start of delivery year (1 st November)
F	End of appeal period	4 months <u>after</u> start of delivery year.

⁴https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/521301/Govt_response_to_March_2016_consultation_FINAL.pdf

3. Government proposes that there should not be any derogations from the requirement to hold connection agreements ahead of pre-qualification for T-1 auctions, for either distribution- or transmission-connected generators.

3.1 It has always been our policy intent that CMUs should hold connection agreements at the point of prequalification for all auctions, although the following derogations were applied in relation to the early Capacity Auction and first two T-4 auctions:

CMU type		T-4 auction	Early Capacity Auction
Transmission-connected	Existing	Transmission Entry Capacity (TEC) not required until 18 months ahead of delivery year – derogation limited to the 2014 & 2015 T-4 auctions only.	TEC/DCA not required until 6 months ahead of delivery year
	New		
Distribution-connected	Existing	No derogation	
	New	Distribution Connection Agreement (DCA) not required until 18 months ahead of delivery year – derogation ongoing.	

3.2 The derogations for (a) transmission connected capacity in the first two T-4 auctions and (b) both distribution and transmission connected capacity in the early Capacity Auction, were principally in recognition of the fact that participants would have already set their connection positions for the related delivery years and would not be able to change this ahead of the prequalification period for these auctions. The derogation for new-build distribution connected capacity was in recognition of the fact that it is unrealistic to expect distribution connected capacity to obtain an agreement 4 years in advance of delivery.

3.3 The derogations were introduced to help encourage liquid auctions, although it was acknowledged that they increase the risk that some CMUs may subsequently fail to obtain connection agreements for their delivery year. It was thought that the arrangements provided a reasonable balance between these two considerations.

3.4 The rationale behind these derogations does not apply for future T-1 auctions. By the time prequalification for the first T-1 auction opens in Summer 2017 the market will have had several years advance warning that a T-1 auction will be held, and will have known of the underlying policy position that connection agreements should be in place at the prequalification stage. We are therefore not proposing to extend these derogations to future T-1 auctions to reduce the risk that capacity procured at T-1 is subsequently unable to deliver on its obligation, noting that there will be very limited ability to replace any lost capacity after T-1.

4. Government proposes to clarify the drafting around total spend declaration

- 4.1 Under the provisions of rule 3.7.2(c) and its associated rule 3.8.1, an applicant for a prospective CMU is required to declare the requisite capital expenditure incurred, or expected to be incurred, in respect of the CMU prior to the commencement of their first CM delivery year; their 'Total Project Spend' ("TPS"). This is subject to two caveats regarding i) the time window for such expenditure and ii) whether the capital expenditure had previously been considered in an earlier prospective CMU application which resulted in the award of a capacity agreement.
- 4.2 We propose clarifying the drafting of this second caveat and putting it beyond doubt that a new build CMU which had been awarded a previous new build capacity agreement would not be eligible for a subsequent multi-year agreement, irrespective of their declared capital expenditure and of the duration of their previous agreement. The concept of a multi-year agreement was introduced to facilitate investment in prospective plant by providing a stable revenue stream on which to engage the lending community. Government asserts that a new build CMU accepting a previous capacity agreement of any length, and the consequential delivery obligations accruing from such, does not require a subsequent new build multiple-year agreement in order to enable the delivery of the new build CMU already committed to under the previous agreement. Enabling such provision would provide artificial and unnecessary revenue stability, whereas it would offer better consumer value for such new build CMUs to compete for a series of single-year agreements in subsequent auctions.
- 4.3 We therefore propose amending the definition of Maximum Obligation Period so as to restrict new build CMUs subject to capacity agreements for previous delivery years to subsequent single year agreements. Applicants for new build CMUs will therefore be able to bid for new build agreements, where they meet the capital expenditure threshold, up until they are successful in obtaining the CMU's first capacity agreement of any duration. From this point going forwards all future applications in respect of that CMU, whilst of a new build status, will be restricted to a single year's duration. New build CMUs unencumbered by a previous agreement at the time of their prequalification application, for example through previously unsuccessful bids or termination of a previous agreement, would not be so restricted; their maximum obligation period would be sized according to whether they met relevant multi-year capital expenditure thresholds.
- 4.4 Under such an amendment the issue of an applicant for a new build CMU relying on previously declared capital expenditure is no longer relevant, so we propose restricting the applicability of the declaration restriction in rule 3.7.2(c) to refurbishing CMUs only. We will also clarify that the restriction of TPS declared will apply in respect of subsequent applications for the refurbishing CMU with three exceptions; i) where the capital expenditure has not previously been declared in respect of an application for a CMU which subsequently gained a capacity agreement of any duration ii) where an ITE's certificate confirms that TPS of a lower figure than that declared has been incurred in respect of the CMU under rule 8.3.6(aa) or iii) the capacity agreement for which the TPS was originally declared in the prequalification application has been terminated.

4.5 The definition of 'Qualifying £/kW Capital Expenditure' for both new and refurbishing CMUs will also be amended to reference the relevant definition of TPS, divided by the de-rated capacity of the CMU. The current definition, on which the eligibility for multi-year agreements is based, does not have the applicable caveats which apply in respect of the TPS. We believe this alignment is a practical and consequential amendment to the rule change which was introduced in respect of rule 3.7.2(c) earlier in the summer.

5. Government proposes to introduce amendments to clarify the drafting of the Regulations and put beyond doubt the requirement to maintain applicant credit cover until a CMU has achieved all of their Financial Commitment Milestone and TEC/connection agreement requirements against which applicant credit cover has been lodged and for which a failure to meet would otherwise trigger a termination event. Amendments will also be introduced to avoid an unintended double liability on a participant as regards to their applicant credit cover and termination fee exposure.

5.1 The provision and maintenance of applicant credit cover is detailed within Part 7, Chapter 2 of the Electricity Capacity Regulations 2014 (as amended). These provisions specify the period for which applicant credit cover must be maintained and when the Settlement Body should draw down this applicant credit cover.

5.2 It has been brought to our attention that the circumstances detailed in regulation 60 do not fully cater for all scenarios in which applicant credit cover has been or must be lodged – primarily in relation to the supplementary auction.

5.3 We therefore propose amending regulation 60(1)(g) to make clear the requirement to maintain applicant credit cover until a CMU has fully discharged all of the Financial Commitment Milestone and TEC/connection agreement requirements against which it lodged applicant credit cover and for which a failure to meet would otherwise trigger a termination event under the CM Rules.

5.4 In addition it has emerged that circumstances may align to place an unintended double liability on a party under regulation 61; whereby they become liable for their applicant credit cover being drawn down against a date based trigger, whilst also being liable for a termination fee for the same event. This is not the policy intent, which is that the former would secure against the latter.

5.5 We therefore propose to amend the provisions of regulation 61 to remove the date based triggers under regulations 61(1)(b) and 61(5) and instead rely on an unpaid termination fee liability to trigger the applicant credit cover draw down.

5.6 As a consequence of the changes outlined above, we also propose to make a number of further minor amendments to clarify the drafting, in particular to regulations 87 and 87A.

6. Government proposes to amend metering provisions in the Capacity Market

6.1 Capacity providers must verify their output to ensure capacity is genuine, providing safeguards against poor performance during system tightness and preventing customers paying for failed delivery. As part of the verification checks, all CMUs must undertake

Metering Assessments and, where required, Metering Tests. The Metering Tests ensure that a site's metering set up accurately reflects the electricity flows to and from the CMU's asset and that the metering equipment is operating correctly, ensuring that the meter readings accurately observe the output of the provider.

6.2 The CM's metering requirements are aligned to existing industry standards, however, Government is aware that some providers have struggled with the DSR Test, the metering requirements and Metering Test, and welcomes industry views as to how requirements could be simplified, whilst maintaining confidence in output readings.

Metering Assessment deadlines

6.3 The Metering Assessment deadlines for different CMUs and auctions are set out in rules 3.6.4, 3.6A.3, 3.9.4, 3.10.2(b) and 8.3.3(a). The deadline for Existing Generation and Proven DSR CMUs with agreements from T-1 auctions was initially set one month prior to the delivery year to facilitate the participation of aggregators and support smaller providers with implementing compliant metering. Subsequent changes⁵ to the CM Rules brought forward this deadline to eight months prior to the start of the delivery year, however evidence from the TA has since shown that this is insufficient for smaller providers and therefore we propose that the providers complete their assessment no later than 6 months prior to the start of the delivery year.

6.4 Government also proposes, for similar reasons to those set out above, to amend the requirement for Existing Generation and Proven DSR CMUs with an agreement in an auction that is held less than eight months before the delivery year, to complete their assessment by one month following the auction to four months prior to the start of the delivery year. Government would also like to clarify that the time period of less than eight months between auction and delivery year will begin from the auction results day.

6.5 Metering Assessments are the first part of the metering process and the uncertainty in the volumes of tests to be undertaken does not allow delivery partners to effectively identify and plan resources. For this reason, Government proposes to bring forward the deadline for Unproven DSR CMUs to undertake their assessments from one month to four months prior to the start of the delivery year.

Metering Test request deadlines

6.6 CMUs are responsible for providing a Metering Test Certificate by the deadlines set out in rule 8.3.3(e), however, currently there is no deadline by which CMUs must submit to the ESC their Metering Test request and the associated Metering Statement. In the TA, this resulted in a large volume of test requests submitted close to the deadline for providing a Metering Test Certificate, creating problems for forward planning. Government proposes to introduce new Metering Test Request deadlines, which will support CMUs to navigate through the metering process and also allow delivery partners to better assess reliable capacity available in the delivery year.

6.7 The proposed deadlines are for:

⁵https://www.ofgem.gov.uk/system/files/docs/2016/07/capacity_market_rules_2016_presented_to_parliament.pdf

- a. Unproven DSR CMUs the date falling 4 months prior to the start of the relevant Delivery Year;
- b. Existing CMUs or Proven DSR CMUs where the time period between the Delivery Year and the auction results day is less than eight months, the date falling 4 months prior to the start of the relevant Delivery Year;
- c. Existing CMUs or Proven DSR CMUs that have been awarded a Capacity Agreement in a T-4 Auction, the date falling 21 months prior to the start of the first Delivery Year;
- d. Existing CMUs or Proven DSR CMUs that have been awarded a Capacity Agreement in a T-1 Auction, the date falling 5 months prior to the start of the first Delivery Year; and
- e. Prospective CMUs, as soon as reasonably practicable after the date on which the Capacity Provider receives notification under rule 8.3.3 (d)(i), and in any event not later than the Long Stop Date

Metering Test Certificate deadlines

6.8 During the TA, many CMUs amended their Metering Statements and requested new tests within days of the deadline by which they needed to have a Metering Test Certificate resulting in difficulties in re-testing. To enable the review of revised statements, Government proposes to push back the Metering Test Certificate submission deadline for Unproven DSR CMUs and providers in a T-1 auction or an auction where the time between the auction and delivery year is less than eight months, from one month to two weeks prior to the delivery year. This would provide additional time for CMUs and delivery partners to re-test following the implementation of rectification plans.

Extend the Metering Test Sampling approach

6.9 Government proposes to extend the Metering Test Sampling approach from the TA (rule 11.3.5D) so that it applies to the early Capacity Auction and enduring regime. The approach was introduced in the TA as an alternative to testing each Generating Unit/DSR Component, to enable operational readiness before the start of the delivery year. In the event of a large number of Metering Tests being requested, particularly in years where there are multiple auctions, the proposed extension will allow the ESC to effectively apply its resources. Chapter 13A would remain applicable to CMUs who have undergone a sampled Metering Test.

Meter data submission for the early Capacity Auction

6.10 Capacity providers using Balancing Services and Bespoke Metering Configuration Solutions in the TAs are able to submit meter data directly to the ESC (rule 11.3.6). This was intended as an interim solution for the TA until an automated process for sending/receiving CMU meter data could be established in time for the first delivery year.

Government proposes to extend this interim provision to the early Capacity Auction until a permanent solution has been established.

7. Government wishes to review its position on pre-auction credit cover requirements for unproven DSR

7.1 In its response to the March 2016 consultation, Government confirmed its intention to increase the pre-auction credit cover requirement for new build CMUs to £10k/MW but not for unproven DSR at that time.

7.2 Government now wishes to review this position in respect of unproven DSR. A case could be made for increasing the level of credit-cover on the grounds that it ensures parity across technology types, and is necessary to improve confidence that unproven DSR applicants provide accurate and realistic information about how much capacity can be delivered. But equally we are alive to arguments that the level should be kept at £5k/MW (or even lowered) as a higher amount could act as a barrier to the participation of DSR in the capacity market as the sector may find it difficult to access lower-cost debt to meet their credit cover costs.

7.3 Government would welcome views on whether (a) credit cover for unproven DSR should be (a) increased to £10k/MW, (b) maintained at £5k/MW, or (c) reduced to a lower level (please specify). Please provide evidence to support your position.

8. Government proposes amending the definition of DSR Bid, DSR Bidding and De-rated Capacity

8.1 DSR providers are able to reduce their de-rated prequalification capacity prior to the auction (rule 5.5.11) ensuring that capacity procured at the auction can be relied upon when the system is tight. Whilst the prequalification capacity is de-rated, the DSR CMU's nominated lower bid volume is not, creating an inconsistency with other CMUs and subsequently reducing the volume of reliable capacity that has been procured.

8.2 Government proposes that the lower volume nominated by a DSR CMU prior to the auction should be de-rated and to integrate the definitions of DSR Bid (Regulations) and DSR Bidding Capacity (CM Rules) into the definition of De-rated Capacity (CM Rules). This change will not result in Unproven DSR CMUs being further de-rated following their DSR Test for that relevant delivery year.

9. Proposal to amend specific termination provisions in the Capacity Market

Termination Fee to be applied to Rule 6.10.1(d)

9.1 Rule 6.10.1(d) is a termination event that is triggered when a CMU no longer satisfies the general eligibility criteria as set out in the Regulations. Many termination events have an associated termination fee to ensure CMUs honour their commitments to make available the capacity procured in an auction. This particular termination event does not have a fee and for consistency and to prevent loss of capacity, Government proposes to apply a termination fee of £10k/MW to CMUs who no longer meet the general eligibility criteria.

New termination event for CMUs not completing a Metering Assessment

9.2 All CMUs are required to undertake a Metering Assessment and where applicable a Metering Test. The requirement for CMUs to undertake a Metering Assessment was previously a prequalification requirement, with the exception of Prospective and Unproven DSR CMUs. Recent amendments to the CM Rules allow capacity providers to defer their Metering Assessment to post prequalification, removing the incentive to complete the assessment and therefore removing the prompt to undertake Metering Tests.

9.3 Government proposes to introduce a termination event for all CMUs (with the exception of Prospective CMUs) who have failed to complete Metering Assessments by the relevant deadline. The termination event will also have an associated termination fee of £10k/MW, which is equivalent to the same fee applied to CMUs who fail to obtain a Metering Test Certificate by the relevant deadline.

10. Government proposes requiring ESC to make available a 6 monthly report of the cumulative amount of aid paid to each beneficiary under the Capacity Market scheme where this has reached or exceeded €500,000.

10.1 In 2012 the European Commission launched a 'State Aid Modernisation' (SAM) exercise to reform State aid control. As part of this, the Commission adopted new transparency requirements in order to increase accountability and provide an opportunity for the public to be better informed about where and how their money is being spent.

10.2 The 'transparency obligation' announced as part of SAM applies to aid granted on or after 1 July 2016. Under the new requirements, when a Member State grants aid to an individual beneficiary from this date, and it is greater than or equal to €500,000, details of the aid must be published on the European Commission's Award Module⁶.

10.3 The Capacity Market Register already publishes the capacity obligations for each Capacity Provider which can be used to calculate the total amount of State aid granted to each beneficiary under each capacity auction. However, capacity payments following secondary trading, over-delivery payments or non-delivery penalties mean that the total aid received by each beneficiary may differ from the amount published on the Capacity Market Register.

10.4 Therefore, the UK Government intends to require ESC to make available a 6 monthly report of the cumulative amount of aid paid to each beneficiary under the CM scheme where this has reached or exceeded €500,000. This will apply to all capacity agreements awarded from 1 July 2016 onwards. The published information will include:

Information on individual beneficiaries published on the European Commission's Award Module

Beneficiary name

Identification of Beneficiary (VAT number)

Beneficiary type ('Large enterprise' or 'Small and medium-size')

Date granted (period over which aid has been paid to date)

Amount in £ (cumulative total in date period)

Table 2: List of information published on individual beneficiaries.

10.5 To comply with this requirement, we propose to include two additional information requirements at pre-qualification: VAT number of the Applicant, and the beneficiary type ('Large enterprise' or 'Small and medium-size').

11. Impact

11.1 The changes to the CM Rules and Regulations being consulted on are essentially technical and are generally intended to simplify and improve accessibility. Certain proposals, such as the re-basing of the supplier charge, may affect the ways in which costs fall across different companies in the business community, but should be neutral in terms of the overall costs on that community as a whole. Note that any changes to the supplier charge would not impact upon current costs for the financial year 2016/17. Other proposals, which simplify procedures, are if anything predicted to reduce CM costs for the majority of businesses, albeit the effects are likely generally to be small scale. Government would welcome any evidence from stakeholders as to the actual cost-impacts of the proposed changes to help inform our assessment in making final decisions.

12. How to respond to this consultation

12.1 If you have any comments on the proposals set out in this document, please submit them as per the instructions on the following page.

Enquiries to:

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Consultation reference: Capacity Market: proposals to simplify and improve accessibility in future capacity auctions.

Territorial extent: Great Britain.

Additional copies: You may make copies of this document without seeking permission.

Other versions of the document in Braille, large print or audio-cassette are available on request. This includes a Welsh version. Please contact us under the above details to request alternative versions.

Confidentiality and data protection: Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 1998 and the Environmental Information Regulations 2004).

If you want information that you provide to be treated as confidential please say so clearly in writing when you send your response to the consultation. It would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.

We will summarise all responses and place this summary on the [GOV.UK website](https://www.gov.uk). This summary will include a list of names or organisations that responded but not people's personal names, addresses or other contact details.

Quality assurance: This consultation has been carried out in accordance with the [Government's Consultation Principles](#).

If you have any complaints about the consultation process (as opposed to comments about the issues which are the subject of the consultation) please address them to:

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