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Dear Johannes,

Five Year Review of the Capacity Market Rules – First Policy Consultation

SSE welcomes the scope and focus of Ofgem's Five Year Review of the Capacity Market Rules (CM Rules).

SSE continues to believe that the Capacity Market is the best tool for delivering the security of supply objective. SSE agrees that the Rules are meeting the objective of security of electricity supply and that efficient operation and administration of the Capacity Market can be further facilitated through reducing complexity of the Rules and the regulatory burden they place on market participants.

SSE broadly supports Ofgem's proposals aimed at streamlining the Rules change process and easing the prequalification burden. However, SSE also considers that care must be taken to ensure that any such changes do not risk the integrity of the Capacity Market or its contribution to the security of supply objective. For example, SSE is concerned that the proposed removal of Independent Technical Expert assessments could weaken governance and assurance arrangements around New Build CMUs. In addition, while providing additional flexibility, the proposal related to delaying the submission of planning consents could also increase the risk of contract termination by allowing this evidence to be provided close to the Financial Commitment Milestone.

Furthermore, while Ofgem's proposal to delay the submission of certain Prequalification data aims to improve flexibility, SSE considers that it must remain possible for an applicant to submit this data during Prequalification if it wants to. This will ensure that market participants who are able to provide the data in one go are not forced to unnecessarily extend the time dedicated to prequalifying the assets.

Separately, SSE notes Ofgem's concerns that any provider facing termination is likely to seek to trade away its obligation to avoid termination fees. Secondary trading has been put in place to mitigate commercial and delivery risks associated with capacity obligations while ensuring that the security of supply continues to be maintained. Arguably, as long as a capacity obligation has been successfully transferred, it should not matter that a market participant has not been penalised for its inability to meet its capacity commitments. However, SSE also

recognises Ofgem's concerns about speculative bids and applications where market participants are able to trade out of their capacity obligations immediately after securing a contract. Therefore, SSE considers that in certain instances it might be appropriate to require market participants to provide additional evidence to substantiate their intention to trade out of the capacity contract.

In addition, SSE agrees that the Secondary Trading arrangements need to be redefined. SSE's view is that the proposals in relation to the Delivery Body's role in the process could be taken further. For example, the timescales within which the Delivery Body is expected to review a secondary trade request or prequalify a new Secondary Trading Entrant could be further reduced.

SSE continues to support the role of the National Grid Electricity System Operator (NGESO) as the Delivery Body of the Capacity Market, however believes that its performance and the incentives framework can be further improved. Brining all aspects of the NGESO's regulatory framework under a unified regulatory regime from 2021 onwards would also deliver a better value to consumers.

Finally, SSE would like to take this opportunity to raise a number of issues have not been addressed as part of the review. Specifically, a consolidated set of Rules with tracked changes reflecting evolving requirements and obligations in each of the Prequalification years would greatly facilitate the CM participants' ability to manage and comply with CM contracts requirements. In addition, while penalties and termination fees are not in the scope of Ofgem's review, SSE strongly believes that CMUs which had a catastrophic failure event must not be penalised for their inability to deliver on their capacity obligation.

Kind regards,

Polina Kharchenko

Regulation Manager

Consultation questions

Section 1: The objectives of the Rules and Capacity Market interactions

Question 1: Do you have any views on the interactions between the CM and other wholesale markets; such as forward markets, the balancing market, and markets for ancillary services?

SSE supports the Capacity Market design implemented in the UK. This technology-neutral single market-wide mechanism best ensures that the required capacity is procured and available at the least cost to consumers. Whilst additional measures to ensure GB generation adequacy have been put in place in recent years, SSE strongly believes that only in combination with the Capacity Market are these additional measures effective in addressing the 'missing money' problem and thereby assuring the GB Reliability Standard.

SSE's view is that the target setting process to determine the optimal capacity level for specific delivery years will continue to ensure that the CM remains a cost-efficient mechanism to deliver the security of supply objective. To this end, SSE welcomes BEIS's intention[1] to commission independent contractors to undertake a review of the current GB Reliability Standard to keep it up to date.

In respect of the balancing market, SSE maintains that the list of Relevant Balancing Services (RBS) in Schedule 4 of the CM Rules should be kept under review and updated as required. This will ensure that the Capacity Market and the markets for ancillary services will continue to successfully meet their respective aims. To this end, SSE supports an addition of the system to generator intertrip service to the RBS list as proposed in Section 6 of the consultation document.

Separately, in respect of Ofgem's ongoing work on electricity networks charging and in particular in relation to setting the TNUoS Generator Residual at 0, SSE is looking for assurance from Ofgem that this work does not result in the over-collection of transmission charges from GB generators compared to their European counterparts. This should ensure that any consequential impacts on the CM clearing price are minimised.

Question 2: Do you have any evidence that design choices in the CM are driving inefficient outcomes in other markets?

In March 2018, when the GB system has experienced a situation very close to a CM stress event, electricity interconnectors were exporting from GB to Europe. The behaviour of interconnectors at the time of a 'proxy' CM stress event raises concerns whether this capacity provides the best value for money to consumers.

SSE notes that the UK Government has already recognised that there is a need to move to a direct foreign capacity participation model. SSE's understanding is that the UK Government intends to put forward the relevant proposals for direct cross-border participation by foreign capacity following their recent consultation on changes to the Capacity Market as part of the

[1] BEIS's Capacity Market and Emissions Performance Standard Review, Page 16: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/732546/CM_Review_call_for_evidence_final_4.pdf

Five-Year Review. SSE is looking forward to constructively engaging in this work through a public consultation process.

Question 3: Do you have suggestions for how these markets can be better aligned and how any inefficiencies can be mitigated?

SSE welcomes the ongoing review of the Capacity Market by BEIS and will constructively engage in this process. SSE also considers that the review of the CM Rules by Ofgem will further facilitate the efficient operation of the Capacity Market. In particular, SSE encourages Ofgem to be alert to any potential impacts of its ongoing work in relation to electricity and gas network charging on the Capacity Market.

Section 2: Ofgem's Rules change process

Question 4: Do you have any views on whether the proposed membership of the CM Advisory Group is appropriate, the form of participation from industry, along with any further points regarding meeting frequency and function?

CM Advisory Group – core membership

SSE welcomes Ofgem's proposal to increase industry engagement through a formation of the CM Advisory Group. We agree that Ofgem as the chair, NGESO as the EMR Delivery Body, BEIS and the ESC should comprise a core membership of the Group. It is important to ensure that this core group regularly interacts with the industry and is guided by market participants' concerns and suggestions in its work. SSE notes that trade associations could be limited in their ability to represent distinct stakeholders' views, given their diverse membership and a consensus approach to reaching an industry position on various matters. Therefore, SSE suggests that the membership should be extended to a spectrum of Capacity Providers and suppliers representing various types of CM capacity holders or CM levy payers who will be able to clearly relay the views of specific groups of interested parties.

CM Advisory Group – frequency and function

SSE supports Ofgem remaining a final decision maker in the rules change process with the CM Advisory Group taking up an advisory and analytical role. Ofgem's proposal to increase frequency of the CM Advisory Group meetings at certain crunch points is also reasonable. Overall, SSE welcomes Ofgem's intent to commit the time to further develop the key aspects of the Advisory Group including its terms of reference, membership, and the nomination process for industry representatives. SSE would also welcome further details on the exact role, autonomy, and outputs that both the Advisory Group and Ofgem will be accountable for.

Question 5: Do you believe the proposed framework and function of the CM Advisory Group is appropriate and would better facilitate the efficient operation of the CM Rules change process?

SSE welcomes the proposal to form the CM Advisory Group and improve the governance arrangements around the rules change process. SSE is looking forward to further details in relation to these arrangements.

Question 6: Do you have any feedback on our proposal to move to an 18-month implementation timescale; consulting on rule amendments which would subsequently be implemented the following Delivery Year?

While SSE supports the differentiation between urgent and non-urgent proposals, it is SSE's view that the proposed soft January deadline for submitting urgent proposals defeats the purpose of introducing flexibility into the CM Rules change process. It is counterintuitive to limit the time within which urgent proposals can be raised, given that certain issues within the CM Rules could be identified relatively closely to the prequalification window. While SSE appreciates that the change proposals deemed urgent should be raised in time to be approved by the Parliament, limiting the change proposal window to January is overly restrictive.

Separately, in relation to non-urgent proposals, while SSE recognises the logic behind introducing a time lag between the proposals window and the implementation date (at least for changes necessitating modifications to the EMR portal), arguably such a delay could disincentivise market participants from raising CM Rules proposals. Specifically, putting forward a rule change and not seeing the outcome for up to 21 months, i.e. from the time a proposal is raised in October and implemented in June ahead of the following year's prequalification window, may be deemed counter-productive in certain instances.

In any case, SSE would welcome clarity on the definition of urgent proposals and Ofgem's further justification as to why it is reasonable to delay the implementation of non-urgent proposals for up to 21 months, in particular where there is no requirement for an additional time to implement an IT system change.

Section 3: Regulatory burden - Prequalification

Question 7: Do you have any views on the proposed process, the implications of the change to the Prequalification procedure and whether it would be a positive change in removing an administrative burden?

SSE supports the proposal to amend the EMR Delivery Body Portal to have functionality for evergreen applications.

Question 8: Do you believe the current length of the Prequalification window is appropriate and if allowing Prequalification submissions to take place throughout the year would be beneficial?

SSE considers that there is merit in extending the length of the Prequalification window period to allow applicants to submit applications at any time within this window.

Separately, and as noted later in the response, SSE's view is that for the data items that Ofgem is proposing will no longer be a mandatory part of the prequalification submission, it must be possible for an applicant to submit the data during prequalification if it wants to, rather than being forced to wait till later. In addition, if this data has been included early, any mistakes in such data must not lead to a prequalification failure as has been the case in the past. A market participant should be allowed to re-submit the correct data at a later stage as appropriate.

Question 9: Do you have any feedback on the options presented in relation to the submission of planning consents and if there are any alternative options that we have not yet considered?

SSE is concerned that Option 1 proposed by Ofgem, i.e. delaying the submission of planning consents up to the time of the Financial Commitment Milestone (FCM), could lead to a termination of the CM agreement where a committed CMU is not able to secure a planning consent in time. SSE's view is that while Option 1 introduces flexibility in relation to planning consent requirements, it also increases the risk of failure to deliver capacity and contract termination by allowing this evidence to be provided close to the FCM.

SSE does accept that an option to delay the submission of planning consents should be available to applicants in the instances where a delay is beyond the applicant's control. However, it is SSE's strong view that applicants should continue to submit planning consents as part of the main application process where this evidence is available in time.

Question 10: Do you have any feedback on the amendments to the Prequalification data items listed in Table 1?

Prequalification data – Delay

SSE recognises that some applicants might find it favourable to be able to delay the submission of Secondary Trading details, MPAN/MSID Meter D, BMU/Component ID and Metering Arrangements. However, similar to the comments made earlier, it is SSE's strong view that an option to submit this information as part of the prequalification process must be maintained. This would allow an applicant who has all necessary information available at the time of prequalification to submit this information in one go and will reduce the burden of dipping in and out of the application system at a later stage.

Prequalification data – Remove

In respect of the Technical Specifications and Forecasted Technical Reliability of an Existing or Prospective Interconnector (Rule 3.6B.1 (a) and (c), respectively), SSE would be concerned if a removal of these Prequalification requirements would limit the Delivery Body's ability to assess the robustness of the Interconnector applicant.

Section 4: Regulatory burden – Reporting requirements

Question 11: Do you believe that removing progress reports and the associated ITE assessments in all cases except those outlined, alleviates the regulatory and administrative burden, while still providing the necessary levels of assurance?

SSE is concerned that a removal of Independent Technical Expert (ITE) assessments could weaken governance and assurance arrangements around New Build CMUs. It is questionable whether a company directors' declaration is a sufficiently independent alternative to ITE assessments. For example, a lack of governance around the progress of New Build CMUs could result in speculative New Build applications being submitted which would undermine the objectives of the CM and contribute to the security of supply risk. SSE's view that the cost of

ITE reports should be considered in the context that a unit has been awarded a multi-year agreement which will ultimately bring it a multi-year revenue stream.

Separately, SSE recognises that the cost of the ITE report might be unjustifiable where the report is invalidated due to some information missing from the report. SSE suggests that there should be a scope for the report iteration to ensure that it ultimately provides the assurance required to validate the progress of the project. It is also crucial that "material changes" required to be highlighted in the CMU's progress report are clearly defined to ensure that an assessment from an Independent Technical Export focuses on the right issues.

Section 5: Secondary trading arrangements

Question 12: Do you have a view on which of the sub paragraphs of Rule 9.2.6(d)(i) – (ix) should only apply to Eligible Secondary Trading Entrants and which to the other categories of Acceptable Transferees?

SSE's view is that Rule 9.2.6 as currently drafted is not sufficiently clear and therefore further consideration should be given to a complete redrafting of this rule. There is also a lack of consistency between the changes proposed by Ofgem and the changes proposed by BEIS[2] earlier this year. Specifically, BEIS noted that sub-paragraphs in Rule 9.2.6 are misplaced and proposed to apply provisions in sub-paragraphs (i) and (ix) to each of Rules 9.2.6 (a) to (d). Rule changes are hard enough to follow and, therefore, misalignment between BEIS' and Ofgem's consultation proposals introduces further confusion.

Question 13: Is it appropriate to allow all parties who have prequalified for the CM for that year to become prequalified for secondary trading? Are there any unintended consequences?

SSE's view is that it is appropriate to allow any CMUs that have prequalified in any delivery year to become automatic Acceptable Transferees. This should be subject to these CMUs providing additional information to bring them in line with the delivery year in question and as long as these CMUs are not Excluded CMUs.

Question 14: What form should a register of Acceptable Transferees take? How should it be populated? And who should be responsible for maintaining it?

In SSE's view, subject to the details provided in the Capacity Market Register (CMR) being extended, there is no need to create a separate register of Acceptable Referees. However, if a separate register were to be created, it would need to be fully aligned the CMR.

Question 15: Do you agree that it would be desirable to allow obligations to be traded between parties in amounts greater than or equal to 0.5MW?

This proposal is likely to be beneficial to smaller CMUs with multiple components, such as DSR. While SSE is supportive of the proposal, it would be worthwhile to further consider the cost-

2 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/784221/further-amendments-to-capacity-market-consultation.pdf

benefit of implementing this proposal given that the consequential increase in administration requirements and associated costs.

Question 16: Do you believe the current time period of five Working Days before the date of the trade by which applicants must submit a request to trade is appropriate or should this period be reduced? Do you have any suggestions on a revised length of this period?

SSE considers that not only the existing period of 5 working days is far too long but also that the proposed 2-working day period can be reduced further. Given that the information on trading counterparties should be readily available in the respective registers, it should not take the NGESO long to reconcile the trade data and make a decision in relation to a trade request.

Question 17: Do you believe that the current period of three months in which NGESO have to notify a Secondary Trading Entrant of the Prequalification decision is appropriate or do you feel this should be shortened? Do you have any suggestions on a revised length of this period?

SSE feels that the current period of three months is unjustifiably long given that it takes NGGESO a similar length of time to assess hundreds of applications during the Prequalification period. A 10-working day period might be more appropriate.

Question 18: Do you agree with adding a provision for the time frame over which NGESO must respond to requests for a trade?

SSE agrees with the proposal to amend Rule 9.3.1 (b) to establish clear deadlines for NGESO to decide whether to accept or reject a registered trade.

Question 19: Do you think it is appropriate to extend the defined trading window to the results day of the T-4 Auction for the relevant Delivery Year?

While SSE supports the extension of the defined trading window to the results day of the T-4 Auction, further consideration should be given to whether CMUs should be required to provide specific evidence to justify an obligation transfer shortly after the auction results. It is important to ensure that secondary trading is underpinned by a genuine reason to mitigate operational or commercial risks. This should address the risk of speculative applications and bids being submitted in the auction with an immediate obligation transfer following the auction results.

Question 20: Does it continue to be appropriate for Transferors to be required to meet their SCM prior to engaging in trading?

SSE considers that a Transferor can be relieved of the requirement to meet its SCM prior to engaging in trading where a transfer of the agreement is driven by a genuine operational or commercial issue beyond the Transferor's control.

Question 21: Does it continue to be appropriate for Transferees to be required to meet their SCM prior to engaging in trading?

SSE considers that a requirement for a Transferee to have met its SCM prior to trading for an agreement can be removed as a Transferee is taking on the risks associated with holding a capacity agreement following the transfer. Potentially, termination fees could be sharpened to incentivise a Transferee to enter into capacity agreement with a genuine intention to deliver the required capacity.

Question 22: How should we address the risk of a trade being withdrawn where a Transferor is terminated after a trade has been registered?

SSE notes Ofgem's concerns that any provider facing termination would seek to trade away its obligation to avoid termination fees. However, the underlying intent of secondary trading is to provide a cost-effective risk mitigation measure to a Transferee while ensuring that security of supply is maintained as a result of an obligation transfer. Therefore, trading out of the capacity obligation to avoid termination fees is a legitimate way of using a secondary trading provision, while cancelling a transfer goes entirely against the aim of securing supply.

However, Ofgem might wish to further consider how trades in this scenario could be differentiated to ensure that accountability culture in the Capacity Market prevails. For example, older Existing Generation CMUs might experience unexpected operational failures leading to a termination of the capacity agreement. SSE believes that there should be a more nuanced and evidence-based approach whereby CMUs can prove that they were genuinely intending to provide capacity but factors beyond their control resulted in them not being able to.

Question 23: How should we address the transfer termination risk where a partial or full Capacity Agreement is traded for part of, or the entire duration of a Delivery Year?

SSE supports the proposal to not terminate a part of the Capacity Agreement where it has been traded for an entire delivery year. Further consideration should also be given to a relief where a part of the Capacity Agreement has been traded for a significant part of a delivery year. This would require a functional separation of the agreement into several shorter corresponding parts.

Question 24: Are there any amendments that could be made to the SPD framework following a secondary trade, specifically relating to partial agreement trades?

SSE agrees that where a Transferor trades away a partial agreement for part of a Delivery Year, it should be only required to demonstrate output of up to the partial capacity agreement.

Section 6: Other changes to the Rules

Question 25: Do you believe the options presented related to SPD data submission are suitable and are there any options we may not have considered in order to help mitigate the impact on capacity providers?

In SSE's view the options presented by Ofgem are suitable. We agree that additional verifications initiated by a CMU should provide assurance to the party that the relevant data has reached the ESC.

Question 26: Which aspects of a CMU configuration do you think should not be able to be amended following Prequalification?

The wording of Rule 4.4.4 is ambiguous. Certainty is required that as long as CMUs can provide the capacity based on their relevant de-rating factors, their agreements will not be terminated. SSE's view is that physical configuration of a CMU should not matter as long as the unit is able to deliver its committed de-rated obligation level.

Question 27: Is there any other data that would be useful to add to the CMR and why?

SSE notes that the format of the Capacity Market Register has been inconsistent from year to year and, therefore, SSE would welcome any format improvements that would make the CMR more user-friendly and consistent. In relation to the additional data to be included in the CMR, SSE supports Ofgem's proposal to include the connection capacity, de-rated capacity, primary fuel type and other relevant details put forward by the NGESO. This should result in an improved level of information and transparency in the CMR.

Question 28: How should the ALFCO formula be adjusted for Interconnectors when their output is affected by actions by NGESO?

SSE agrees that the ALFCO formula should be adjusted to reflect an incremental impact of ESO's instructions on the interconnector's CM committed output.

However, as noted in response to Section 1 of the consultation, SSE is concerned that the observed behaviour of interconnectors at the time of a 'proxy' CM stress event calls into question whether this capacity provides the best value for money for consumers. For example, in March 2018, when the GB system has experienced a situation very close to a CM stress event, interconnectors were exporting from GB to Europe.

Question 29: Should system to generator intertrips be included as a RBS in Schedule 4 to relieve providers of their obligations when affected by such an intertrip?

Given that a system to generator intertrip service can result in an automated reduction or disconnection of a generator by the NGESO following a system fault event (which is out with of the control of the CMU), it is SSE's view that all CMUs that are providing such a service to NGESO should not be penalised or terminated where a CM stress event has occurred at the same time as a system fault event. Indeed, to not make such a change could possibly create unintended system operational risks if relevant CMUs withdrew from providing system to generator intertrip services. Therefore, it would be appropriate to add generator intertrips as an RBS in Schedule 4 of the Rules.

Separately, in light of the recent changes to the GB regulatory framework in respect of balancing that arises from the implementation of the European Network Codes, further consideration should be given to the changes to Relevant Balancing Services required in order to ensure that the CM Rules reflect those law changes and avoid the CM Rules being incompatible with EU law (and which, post Brexit, are still due to be applicable in UK law).

Question 30: How should we differentiate between firm and non-firm connection agreements at the Distribution level?

SSE agrees with Ofgem that it would not be appropriate for Distribution connected CMUs with non-firm access rights to be absolved of their Capacity Obligation and exempt from penalties if subject to an interruption by a DNO. These capacity providers should be expected to factor in the risk of being unable to meet their Capacity Obligation into their decision to agree to a lower cost non-firm connection. Therefore, it would be appropriate to apply a higher de-rating factor to units with non-firm connections.

Question 31: How should Distribution-connected generators with non-firm connection agreements be de-rated to accurately account for their contribution in a stress event?

In principle, SSE agrees that accounting for a non-firm connection in a generator's de-rating factor is a reasonable approach. For existing generators, this approach could potentially be based on their historic performance, for example, over the last 3 years, to identify how often these generators were constrained during the periods in which a stress event was most likely.

Section 7: NGESO's incentives and role in the CM

Question 32: Do NGESO's current financial incentives on demand forecasting accuracy, dispute resolution, DSR Prequalification, and customer and stakeholder satisfaction drive the intended behaviours by NGESO?

SSE notes that there is a lack of transparency on NGESO's performance and the allocation of incentive pot in relation to each of the CM incentives. Detailed comments in relation to specific incentives can be found further in this section.

Question 33: Do the financial incentives listed above remain fit for purpose?

Please see the response to Questions 35-39.

Question 34: What behaviours and outcomes should NGESO's financial incentives drive? What form should these incentives take?

Please see the response to Questions 35-39.

Question 35: Do you agree that a demand forecasting accuracy incentive remains appropriate?

SSE's view is that an accurate demand forecast is essential in setting the optimal target capacity to ensure that consumer costs are minimised. Therefore, appropriate governance arrangements around a demand forecasting accuracy incentive in the CM must be maintained. SSE supports the inclusion of this incentive within the ESO's wider package of demand forecasting incentives to ensure that there is no double counting and synergies between the ESO's internal functions are appropriately captured.

Question 36: Do you agree that the dispute resolution incentive should be based on a proportion of Prequalification or Reconsidered Decisions overturned by the Authority rather than on the absolute number?

SSE considers this proposal to be reasonable. SSE would welcome Ofgem's further suggestions on the appropriate threshold for this incentive.

Question 37: Do you agree that the DSR Prequalification incentive should be replaced by an incentive intended to drive NGESO to aid smaller providers, new entrants, and innovators navigate the CM?

SSE supports the proposal to replace the DSR Prequalification incentive with an incentive to drive NGESO to aid less established capacity providers.

Question 38: Do you agree that an incentive on NGESO's customer service and stakeholder engagement remains appropriate? What form should this incentive take?

SSE supports the inclusion of this incentive within the ESO's wider package of incentives. It is important to ensure that this incentive appropriately captures the quality of service and support received by market participants and is not based on purely quantitative metrics, such as a number of engagement sessions held or a number of participants in attendance.

Question 39: Do you agree that the incentives on NGESO for delivering the CM should be aligned with NGESO's incentive framework? Should the CM incentives be incorporated into NGESO's incentive framework in the longer term?

SSE strongly supports this proposal to ensure there is no double counting and the internal ESO synergies are appropriately captured. SSE would also welcome further clarity on how the incentives pot is being apportioned at the end of the financial year.

Question 40: Does the separation of the EMR Delivery Body from NGESO continue to remain appropriate given the separation of NGESO from the rest of NGESO plc?

SSE considers that it would be appropriate to soften business separation between the ESO and the EMR Delivery Body functions of National Grid Group once legal separation of the TO and ESO functions is fully embedded. In particular, this should be implemented in the areas where synergies can be achieved, such as data forecasting.

Section 8: Postponed changes

OF12: DSR CMU Component Reallocation

SSE supports the proposed change. This will provide additional flexibility for DSR CMUs to mitigate their non-delivery risk where one of their components fails.

Separately, another restriction in the Rules, if addressed, could provide further flexibility to DSR. This is related to a requirement to provide the metering assessment for the 2019/20 delivery year for all DSR CMU components at the same time. Given that different components of a DSR CMU are being contracted at different times, flexibility around the timing of the metering assessments submission could further lessen the burden for DSR CMUs.

Similarly, further consideration could be given to the changes around DSR testing, such as multiple DSR Tests which could provide several opportunities to test different DSR CMU components. The total of these tests can then be used to determine the DSR CMU's final capacity.