



Capacity Market Team

Electricity & Market Arrangements  
Department for Energy Security and Net Zero  
3-8 Whitehall Place  
London  
SW1A 2JP

By email: [electricity.security@beis.gov.uk](mailto:electricity.security@beis.gov.uk)

**Uniper UK Limited**  
Compton House  
2300 The Crescent  
Birmingham Business Park  
Birmingham B37 7YE  
[www.uniper.energy](http://www.uniper.energy)

Registered in  
England and Wales  
Company No 2796628

Registered Office:  
Compton House  
2300 The Crescent  
Birmingham Business Park  
Birmingham B37 7YE

## **Capacity Market: Rule Amendments to support Auction Liquidity**

May 2, 2024

### **About Uniper**

Düsseldorf-based Uniper is an international energy company with activities in more than 40 countries. The company and its roughly 7,000 employees make an important contribution to supply security in Europe, particularly in its core markets of Germany, the United Kingdom, Sweden, and the Netherlands.

Uniper's operations encompass power generation in Europe, global energy trading, and a broad gas portfolio. Uniper procures gas—including liquefied natural gas (LNG)—and other energy sources on global markets. The company owns and operates gas storage facilities with a total capacity of more than 7 billion cubic meters.

Uniper intends to be completely carbon-neutral by 2040. Uniper aims for its installed power generating capacity to be more than 80% zero-carbon by 2030. To achieve this, the company is transforming its power plants and facilities and investing in flexible, dispatchable power generating units. Uniper is already one of Europe's largest operators of hydropower plants and is helping further expand solar and wind power, which are essential for a more sustainable and secure future. The company is progressively expanding its gas portfolio to include green gases like hydrogen and biomethane and aims to convert to these gases over the long term.

Uniper is a reliable partner for communities, municipal utilities, and industrial enterprises for planning and implementing innovative, lower-carbon solutions on their decarbonisation journey. Uniper is a hydrogen pioneer, is active worldwide along the entire hydrogen value chain, and is conducting projects to make hydrogen a mainstay of the energy supply.

### **About Uniper UK**

In the UK, Uniper owns and operates a flexible generation portfolio of seven power stations, a fast-cycle gas storage facility and two high pressure gas pipelines, from Theddlethorpe to Killingholme and from Blyborough to Cottam. We also have significant long-term regasification capacity at the Grain LNG terminal in Kent, to convert LNG back to natural gas.

### **Consultation Response**



*1. Do you agree with the proposal to introduce conditional deadline extensions for the statutory requirement for FFEDs to be independently verified?*

Yes.

*2. Do you foresee any unintended consequences as a result of the proposal to introduce conditional deadline extensions?*

The extension of the deadline to submit a verified FFED should not create an opportunity for a second chance for verification after a failed first attempt.

*3. Do you agree with the proposed amendment to the definition of an Emissions Year in the CM rules?*

Yes.

*4. Do you foresee any unintended consequences as a result of the proposed amendment to the definition of an Emissions Year in the CM rules?*

None.

*5. Do you agree with the requirement for Applicants to resubmit previously verified FFEDs with their application?*

Yes.

*6. Do you foresee any other impacts as a result of the proposal to require Applicants to resubmit previously verified FFEDs, besides those identified?*

None.

*7. Do you agree with proposed changes to the Exhibit ZA?*

Yes.

*8. Do you foresee any other impacts as a result of the proposed changes to the Exhibit ZA, besides those identified?*

None.

*9. Do you agree with the proposal to accept older versions of the FFED provided they were verified no later than four weeks after the introduction of a newer version?*

Yes.

*10. Do you foresee any other impacts as a result of the proposal to accept older versions of the FFED provided, besides those identified?*

For a capacity provider relying on the Fossil Fuel Yearly Emissions Limit, the proposed rule change may not provide the same flexibility as the Fossil Fuel Emissions Limit to verify annual emissions.