

## **Conclusions Report to the Authority**

### **Use of System Charging Methodology Modification:**

**UoSCM-M-04**

**Chargeable Generation Capacity for  
Mothballed Generating Units**

13 February 2002

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## **1. INTRODUCTION**

A consultation document for modification proposal UoSCM-M-04 was issued on 22 January 2002. The document proposed to change the Use of System charging methodology such that a Generator who mothballs its Generating Units for a Financial Year (April to the following March) would not be liable for Transmission Network Use of System (TNUoS) generation charges in that Financial Year. The modification proposal was required due to the misalignment of the Balancing & Settlement Code (BSC) Seasons for submitting Generation Capacity data and the charging year, as well as the inflexibility of registration of GC within the BSC.

The modification proposal suggested some new text for the Statement of the Use of System Charging Methodology, which would reflect such a change to the methodology and invited comments up to 12 February 2002.

## 2. TERMS OF THE ORIGINAL PROPOSED MODIFICATION

<p><b>Description of proposed modification to the Use of System Charging Methodology</b></p> <p>The modification would change the rules for calculating Chargeable Generation Capacity for mothballed Generating Units. The change would mean that, if a Generating Unit did not generate in the months April and May, and registered a GC of zero for the months June to February of the same Financial Year, then the Chargeable Generation Capacity would be zero. The change would result in Generating Units mothballed for the months April to February of a Financial Year not being liable for TNUoS generation charges for that Financial Year.</p>
<p><b>Explanation of the issue</b></p> <p>A BM Unit situated in a positive charging zone will be liable for annual TNUoS generation charges based on the highest Generation Capacity (GC) registered from April to February. A Generator wishing to generate in March (for example at 400MW), but wishing to mothball the Generating Unit for the subsequent Financial Year would be required by the BSC to submit a GC of 400MW for the Spring season. The Spring season covers March, April and May. This means that, although the Generator may have no intention of generating for the subsequent Financial Year, a GC of 400MW would be registered, which would trigger a TNUoS generation charge liability for that subsequent Financial Year. The liability would be based on the GC registered for the Spring Season and the relevant TNUoS generation tariff. It was, however, never the intention for the charging methodology to charge Generating Units that were mothballed for the months April to February of a Financial Year.</p>
<p><b>Justification for proposed modification</b></p> <p>To better achieve Licence Condition C7A 5(a), the Relevant Objective of facilitating competition in the generation and supply of electricity.</p>
<p><b>Suggested alternatives</b></p> <p>None</p>
<p><b>Implementation date</b></p> <p>1 April 2002</p>
<p><b>Proposed changes to the Statement of the Use of System Charging Methodology</b></p> <p>It is proposed to add a paragraph after 5.8 as follows (existing paragraph 5.8 included for information)</p> <p>5.8 Chargeable Generation Capacity for Power Stations situated in positive charging zones is the sum of the highest Generation Capacity submitted for settlement purposes for each BM Unit associated with Generating Units forming the Power Station from the beginning of April to the end of February for that Financial Year.</p>

**5.9 Notwithstanding 5.8 if, for a Financial Year, a BM Unit:**

- a) **does not have a positive value of  $QM_{ij}$  for any settlement period in the months April and May, and**
- b) **the BM Unit submits a Generation Capacity of zero for the months June to February inclusive,**

**then the Chargeable Generation Capacity of the BM Unit for that Financial Year will be zero.**

**Proposed changes to the Statement of Use of System Charges**

None.

**Impacts on existing Use of System charges**

None.

**Impacts on other Industry Documents**

It should be noted that BSC modification proposal P64 is currently going through the BSC modification process. P64 proposes to allow the reduction of a GC to zero during a BSC season. If the proposal is accepted, however, it is unlikely to be in effect before 1 April 2002.

### 3. RESPONSES TO THE MODIFICATION PROPOSAL

Comments and views were invited on all the issues raised in the Modification Proposal up to 12 February 2002. National Grid received eight responses, which are included in Appendix 1.

All respondents agreed that a modification should be made to ensure that a Generator who is genuinely mothballing a Generating Unit for a Financial Year would not be liable for Transmission Network Use of System (TNUoS) generation charges in that Financial Year, even if it has submitted a non-zero Generation Capacity (GC) value applicable for April and May of that Financial Year under the BSC.

There was general support that National Grid's proposed modification delivered this principle. Some specific issues raised however are considered below.

#### **Allowing Reduction of Capacity to A Value Other Than Zero**

Four respondents noted that allowing a reduction in capacity to a non-zero value should also be considered. The majority noted that perhaps this could be considered as part of a separate and more fundamental review of the use of GC as a charging base. A number of other issues with the use of GC were quoted in support of this.

This modification (UoSCM-M-04) aims specifically to resolve the issue of TNUoS generation charges for Generating Units mothballed from April yet having a non-zero GC due to generation in the previous March. Whether a non-zero value lower than the declared GC should be used in determining the Chargeable Generation Capacity, for the Spring Season only, or for the whole year, has much wider implications. For example, we would need to consider whether the charge base reflects the intended cost drivers (e.g., including considerations of some of the other issues raised by respondents), the process for auditability of the data and the impact on charging systems. Therefore we believe that the general use of GC as a charging base for generation charges should be considered in a separate review to be initiated in the near future. This will allow all the options to be considered and the most suitable charging base derived.

#### **Using MEL to Define Chargeable Generation Capacity**

One respondent suggested that MEL, instead of metered output (QM), should be used in the condition proposed for April and May, in order to obviate the possibility of Generators putting speculative BM offers during those two months. Another respondent suggested using the formula "min[MEL, GC]" throughout the year to determine the Chargeable Generation Capacity.

We agree that by putting a condition on MEL being zero, rather than QM being no greater than zero, for April and May, the Generator's **intention** of mothballing is made clearer. However, we do not believe that the consequence of any Generator potentially having an offer accepted in the BM is material as this will trigger a positive metered volume and hence attract a charge under the charging rules as defined in this modification. Further, MEL is not part of the commercial data input to National Grid's charging system, therefore using MEL would require system changes and potentially cause delay and increase the costs of the implementation of this modification.

However we agree that the more general issue of whether MEL should be used for defining the Chargeable Generation Capacity for the whole year needs to be given careful consideration including the accessibility and validity of MEL and the potential impact on the charging systems. We believe such consideration should be given in the separate review we referred to above instead of this specific modification.

### **Applicability of Text**

One respondent suggested that the modification, although triggered by the current misalignment between BSC Seasons and the Financial Year, should be generic so as to obviate the need for further charging modification in the event of a realignment of BSC Seasons and the Financial Year.

We agree that it would be useful to highlight in the charging methodology statement why this extra condition on Chargeable Generation Capacity is required.

We therefore propose to add a paragraph after the new paragraph 5.9 explaining how 5.9 is applied.

*"5.10 The above paragraph is required because the Balancing & Settlement Code Seasons for submitting Generation Capacity and the Financial Year do not align. "*

We believe that it is impossible to forecast and pre-empt future modifications that might occur in the BSC and insulate the charging methodology against them. If the BSC Season process or GC submission changes in future, it will be sensible to ensure that the full implications of this are taken into account, which may be wider than this specific paragraph. The text we have proposed to include above will hopefully ensure that that the interaction is clearly picked up.

### **Charges Applicable for Distributors Disconnection**

One respondent raised a parallel issue of charges payable by Distributors pulling out of a GSP.

Because distributors are not liable for TNUoS charges, the annual charges applicable to a Distributor disconnecting from a GSP relate to the definition of Termination Amounts under the Connection Charging Methodology. Therefore we do not believe this issue has any direct relevance for this Use of System Charging Methodology Modification. As Ofgem are soon to be conducting a review of Termination Amounts under the Connection Charging Methodology, the issues raised by the User could be considered Ofgem's forthcoming review.

### **Alignment of Capacity Notification and National Grid's Tariff Derivation**

One respondent pointed out that the timing of Generators notifying GC for the Spring Season (by 14 February) and that of providing the indicative GC data for National Grid to derive tariffs (finalised by 31 January) are out of synch. The respondent believed that these notification activities should be rationalised to avoid increasing the likelihood of over/under recovery.

We agree that ideally the capacity notification processes and charge setting processes should be aligned such that charges are set as much as possible with perfect foresight. In the case referred to above, this would require a change to the BSC for the submission of GC. However, it is likely that there will always be an element of forecasting required, particularly on the demand side. Demand charges

are based on kWh taken in different time periods and make up more of the revenue recovery from TNUoS. Therefore, we do not believe we can address the specific element of capacity forecasting through this modification, however it is an important element to bear in mind for the future review of charging bases.

#### **4. CHANGES TO THE PROPOSAL IN LIGHT OF REPRESENTATIONS MADE**

In light of the responses received, National Grid does not intend to make any changes to the principles underlying the methodology modification proposal summarised in section 2.

However, in terms of explaining the methodology in the Statement of the Use of System Charging Methodology, a new paragraph 5.10 will be added in the proposed text to explain why paragraph 5.9 is required

*"5.10 The above paragraph is required because the Balancing & Settlement Code Seasons for submitting Generation Capacity and the Financial Year do not align."*

In addition, we agree that the charging methodology modification proposal would better achieve both Relevant Objectives C7A.5(a) and C7A.5(b) rather than just C7A.5(a) as originally proposed.

All the proposed new text for the implementation of this modification into the Statement of the Use of System Charging Methodology is included in Appendix 2.

We intend to address the wider issues raised concerning the most appropriate charging base for TNUoS generation charges in a separate review to be initiated in the near future. This will allow all the options to be considered and the most suitable charging base derived.

#### **5. HOW THE PROPOSED MODIFICATIONS BETTER MEET THE RELEVANT OBJECTIVES**

The proposed modifications would enable the charging methodologies to better meet the relevant objective as set out in the transmission licence condition C7A.5(a) and C7A.5(b):

*"that compliance with the use of system charging methodology facilitates effective competition in the generation and supply of electricity and (so far as is consistent therewith) facilitates competition in the sale, distribution and purchase of electricity".*

*"that compliance with the use of system charging methodology results in charges which reflect, as far as reasonably practicable, the costs incurred by the licensee in its transmission business".*

#### **6. TIMETABLE FOR IMPLEMENTATION**

The modification proposal outlined an implementation date of 1 April 2002. National Grid has no reason to change this implementation date and therefore proposes that the Use of System charging methodology and the Statement of the Use of System Charging Methodology be modified from **1 April 2002**.

The intention would be to include the required changes to the Statement of the Use of System Charging Methodology in the final draft of the April 2002 Statements intended to be sent to Ofgem at the end of February. The initial drafts of these charging statements are published on our website and comments have been invited from Users.

## **APPENDIX 1 – RESPONSES TO MODIFICATION PROPOSAL**

### **Response from TXU Europe Energy Trading Ltd**

Thank you for raising the above Consultation Paper and the associated issue. We confirm that we would like to see the proposed changes implemented with effect from 1-04-2002.

Having said that we have noticed that the drafting that NGC are proposing only works in the case of mothballed plant. It would not allow a generator to reduce the output of a BM Unit in the circumstances described. We could envisage a scenario where a Generator might wish to reduce the output from a CCGT Module – i.e. just use the GT in the following year – which would not be facilitated by the change as drafted. We believe that this issue should be addressed under a separate consultation.

There is also the issue of an increase in GC resulting from the provision of Low Frequency Response which also needs to be addressed at some future point in time.

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### **Response from Edison Mission Energy**

Thank you for the opportunity to comment on the UoSCM-M-04 consultation, First Hydro Company supports the general principle of the modification in that Generation that wishes to ‘mothball’ for a full charging year should be allowed to have a positive GC in the previous March. The current link between the BSC rules governing the GC and the subsequent use for charging in the Use of System Charging Methodology currently prevents this, as well as causing a number of other problems.

Although we support the modification we think that there may be a better way to achieve the same result. We think that consideration should be given to using the minimum of MEL or GC (i.e.  $\min[\text{MEL}, \text{GC}]$ ) as a replacement for GC, in the Use of System Charging Methodology.

The modification as proposed does not solve the problem of Generators who wish to reduce output (but not to zero) for a charging year or generation that delivers generation for frequency response above the BM units GC. In the first of these circumstance the generator may be charged for UoS at the full GC rate for the whole year whilst in the second of these circumstances the Generation may be required pay additional UoS charges for providing frequency response above its GC.

The change to using the minimum of GC or MEL may solve both of these connected issues as well as the original Mothballing Issue.

We have put forward this suggestion as an alternative way of solving the mothballing problem, and would be happy to provide further clarification if required.

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### **Response from Scottish Power Generation Limited**

This response to NGC’s consultation on its Charging Modification Proposal UoSCM-M-04, “Chargeable Generation Capacity for Mothballed Generation Units”, is submitted on behalf of Scottish Power Generation Limited. In essence we generally support the Modification, but recommend an amendment to the proposed definition of

mothballed units, and further suggest the definition be made generic with respect to BSC Season.

The aim of Modification UoSCM-M-04 is to resolve, in time for April 2002 charging, the issue that if a generator wishes to mothball a given BMU for a given Financial year, then the BMU remains liable for NGC generation TNUoS charges for that Year unless it is mothballed from March onwards, i.e. a month early.

This issue arises primarily due to the use of Generation Capacity (as defined in the BSC) in the definition of the charge base for NGC's generation TNUoS charges. NGC has acknowledged that this term was initially chosen as the nearest NETA equivalent to GRC, on which generation TNUoS charges were previously based under the Pool. However, the two terms are not in fact equivalent, since Generation Capacity was defined in the BSC specifically for the purposes of forming an input to the Credit Cover methodology, and may only vary between BSC seasons.

We agree that the correct solution to the immediate issue is to introduce a Charging Modification, which ensures that generation units mothballed from April 2002 do not face TNUoS charges for 2002/03.

We also agree that such a modification should amend the Use of System Charging Methodology Statement such that the Chargeable Generation Capacity assumes a value of zero for mothballed units, and that the amended definition proposed in UoSCM-M-04 does indeed achieve this outcome.

However, we wish to point out that it may not be the best means of doing so, for the reasons discussed below.

#### Concerns with NGC's proposed definition

Our main concern with NGC's proposed two-part definition of mothballed units is in the first part, namely that the BMU does not generate during April and May. This is expressed in the proposed paragraph 5.9a as the BMU "does not have a positive value of  $QM_{ij}$  for any settlement period in the months of April and May". Given that a mothballed unit does not generate for the reason that is not made available to generate, a more complete definition would be to replace  $QM_{ij}$  with  $MEL_{ij}$ . This choice is also consistent with the concept that the TNUoS charge base is the maximum output level which may be possible (although not necessarily attained), the long term definition of which is the capacity while MEL, rather than actual output, is its short term equivalent.

A further point worth noting about the use of output rather than availability in the definition is that it does not preclude the BMU participating in the BM during April and May, by submitting an FPN of zero and speculative offers. It therefore allows the generator to delay the final decision to mothball until mid May, when it must notify the Generation Capacity for the BSC Summer season.

#### Recommended amendment to the definition

In the light of the concerns stated above, we **recommend that  $QM_{ij}$  be replaced with  $MEL_{ij}$  in the definition proposed in UoSCM-M-04**. In addition to creating a more consistent definition, this change would also eliminate the scope for gaming.

#### Suggested further generalisation

A more minor comment on NGC's proposed definition is that it will require further modification in the event of any future change in the definitions of BSC seasons, for example a realignment with the Financial Year and contracting rounds.

It may therefore be more efficient in the long run to cater for such a situation at this stage, by **reformulating the definition so as to be generic with respect to BSC season**, for example by redrafting 5.9 as follows:

5.9 Notwithstanding 5.8 if, for a Financial Year, the first day of the Financial Year lies within a BSC season, and a BM Unit:

- a) does not have a positive value of  $QM_{ij}$   $MEL_{ij}$  for any settlement period in the BSC season within which the first day of the Financial Year lies, and
- b) the BM Unit submits a Generation Capacity of zero for all subsequent BSC seasons covering the period up to the end of February inclusive,

then the Chargeable Generation Capacity of the BM Unit for that Financial Year will be zero.

### Summary

The issue of TNUoS liability for mothballed plant should indeed be resolved.

In the short term, we consider it most appropriate that this be through a modification to NGC's Charging Methodologies, to ensure that generation units mothballed from April 2002 do not face TNUoS charges for 2002/03.

We agree that UoSCM-M-04 achieves this aim, but **recommend that  $QM_{ij}$  be replaced with  $MEL_{ij}$  in the definition proposed in UoSCM-M-04**, in order to create a more consistent definition and eliminate a gaming opportunity.

Further, we note a **simple generalisation of the proposed UoSCM-M-04 definition**, which is sufficiently generic to allow for any subsequent changes to the definitions of BSC seasons, thereby avoiding the need for a further modification in this event.

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### Response from SEEBOARD Energy Limited and SEEBOARD Power Networks Plc

We have examined details of this proposal, in document referenced UoSCM-M-04, and have no issues. Furthermore we agree that its implementation would better achieve Licence Condition C7A 5(a) and, therefore, give it our full support.

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### Response from Powergen

I am responding on behalf of Powergen to the consultation on the above Charging Modification Proposal. We are supportive of the proposal in as much that it addresses the immediate problem that some generators have with mothballing plant for next year. However, we do not believe that the proposal provides the total solution to the anomaly in the charging methodology, as it fails to address the situation where there is a reduction in capacity to a level greater than zero.

Therefore, whilst we agree with the implementation of the modification, we feel that the issue of a longer term solution should be addressed as part of the review of charging methodology which NGC proposes to undertake next year.

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## **Response from EdF Trading Ltd and EdF (Generation)**

With reference to NGC's consultation document on the proposal to modify the UoS Charging Methodology to take account of generators wishing to mothball plant, please find below my comments made on behalf of EdF Trading Ltd and EdF (Generation).

In general I believe it is very laudable that NGC has brought out this mod in timely fashion to address an issue before the new charging season, something which the BSC Mod P64 will not be able to do. Furthermore, the proposed changes, as far as they go, are supported as they do correct a clear anomaly.

However I would have preferred NGC to go further, in order to address the occasion when a Generator may wish to just reduce its output to something above zero, rather than to mothball it. A Generator wishing to alter its GC from 200MW to 100MW in a similar example as given for the mothballing situation would give the same anomalous results, which again could be as easily corrected by similar changes to Para 5.9.

It may be that NGC believe that an enhanced change would be premature in advance of P64 and that it would be better to await the outcome of the full consultation of the BSC Mod. If this were to be the case and it was the view of Ofgem as well, then this should not in my view prevent the UoSCM mod as proposed by NGC from being adopted. The P64 consultation will allow a much wider review of GC to be taken, not least of which will be the way it does or does not impact on Interconnectors and Interconnector Users.

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## **Response from London Electricity Group**

### **Mothballed Generators**

The London Electricity Group and its companies that are signed parties to CUSC agree with the proposed changes to the Use of System Charging Methodology set out in the UoSCM-M04 consultation.

We agree that NGC's charges should take account of Generators wishing to mothball their plant over the period April to February in any Financial year.

We also think that sensible in the context of the BSC modification proposal P64.

### **Parallel charging considerations**

However, the subject of the consultation - paying charges for plant that is not connected - reminded us of the charging rules for distributors connected to grid supply points.

A distributor removing from a Grid Supply Point is not a common occurrence and we do not therefore wish to delay the current consultation decision by requiring consistent rules to first also be applied to distributors or other users in a similar situation. But we do consider that the CUSC notification requirements for Disconnection and Decommissioning should be reviewed.

As an example, if a distributor gave notice on the 1st October 2001 of Decommissioning a circuit on 1st April 2002, the distributor would still be liable for TNUoS charges until 31st March 2003. I illustrate this further by copying the recent NGC reply to my enquiry on the subject:

"In terms of "pulling out " of a GSP the CUSC deals with it as follows. There are two options for you, either Disconnection or Decommissioning covered by CUSC. Clause 5.6 states that "each user shall, as between NGC and that User, give to NGC not less than 6 months written notice of any intention of the User either to decommission the User's equipment or to Disconnect the User's equipment." Clause 5.7 then deals specifically with disconnection and 5.7.2 deals with the payment issue. Part (a) of the clause states that the user will be liable for "Connection Charges and/or Use of System Charges to the end of the financial year in which the termination occurs". So in other words the latest you could give notice to disconnect in order to avoid having to pay charges beyond the current financial year is September 30th to disconnect on the 31st March. If you were to leave any later the six month notice period will run into the next financial year and consequently you would be liable for charges for the whole of that year.

If you were to decommission then the same rules apply for notice and liability for charges except that you would still be required to pay ongoing connection charges but TNUoS charges would cease once you had reached the end of the financial year in which you gave notice. E.g.. Give 6 months notice 30th September 2002 to decommission on 31st March 2003. You would be liable for connection and TNUoS charges to 31st March 2003 and Connection Charges only from April 1 2003. You then are required to give 3 months notice to re-commission."

I request that this parallel consideration is included in the summary of responses that will be forwarded to the Authority, but with comment that we do not wish the original question to be significantly delayed by consideration of it.

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## **Response from British Energy**

Thank you for the opportunity to comment on this proposed modification to the UoSCM.

Having considered the rationale for the proposed change, I would advise that BE supports the modification proposal on the basis that this is an equitable solution to the issue which has arisen as a result of the misalignment of the BSC seasons and the financial year.

It is noted that modification P64 has been raised in the BSC, which if approved would also resolve this particular issue. However, that proposal seeks to go further than this UoSCM modification and our support for this specific proposal should not be seen as support for the BSC modification with its wider implications which needs further consideration.

I also note that the justification for this proposal is on the basis of 'facilitating competition.' However, I would have thought that, in the (somewhat surprising) absence of an 'efficiency' objective, this change would be better promoted as improving the cost reflectivity of charges under C7A5(b)?

In supporting this modification proposal I note that in setting the tariffs for 2002/03, NGC advised at the recent TCMF that there will be an over-recovery this year primarily because the level of capacity anticipated to be mothballed post-NETA did not materialise. Users are obliged to provide indicative GC data to NGC during the December prior to the next Charging Year in order for tariffs to be set and finalised by 31st January latest in accordance with NGC's licence obligations. The relative timings of necessary BSC notification of GC for the Spring Season (14th February) and GC data to NGC are out of sync. There therefore could be a need to rationalise these notification activities particularly if, by approving and incorporating this specific modification, there is likely to be a detrimental effect on the derivation of tariffs and/or an increase in the amplitude of over/under revenue recovery in the future, potentially leading to more volatile charges to Users. Perhaps it would be helpful to Users for NGC to provide some information on the sensitivity of tariffs to levels of mothballing to allay/confirm these concerns?

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## **APPENDIX 2 – PROPOSED NEW TEXT FOR THE STATEMENT OF THE USE OF SYSTEM CHARGING METHODOLOGY**

The proposed new text for the Statement of the Use of System Charging Methodology is as follows:

It is proposed to add a paragraph after 5.8 as follows (existing paragraph 5.8 included for information)

**5.8** Chargeable Generation Capacity for Power Stations situated in positive charging zones is the sum of the highest Generation Capacity submitted for settlement purposes for each BM Unit associated with Generating Units forming the Power Station from the beginning of April to the end of February for that Financial Year.

**5.9** **Notwithstanding 5.8, if, for a Financial Year, a BM Unit:**

**a) does not have a positive value of  $QM_{ij}$  for any settlement period in the months April and May, and**

**b) submits a Generation Capacity of zero for the month June to February inclusive,**

**then the Chargeable Generation Capacity of the BM Unit for that Financial Year will be zero.**

**5.10** The above paragraph is required because the Balancing & Settlement Code Seasons for submitting Generation Capacity and the Financial Year do not align.