Stage 04: Draft Mod Report

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

P240: Switching Plant and Apparatus between BM Units

Currently the BSC does not allow Generating Plant to be moved from one BM Unit to another in operational timescales, except by re-registering the BM Units which takes 30 working days.

P240 proposes to allow Power Park Units to be moved between BM Units in operational timescales. The arrangements would apply in the case where Exports from and/or Imports to Plant and Apparatus may be electrically switched between transmission connections.

Initially, the Panel recommends Approval of P240

High Impact:
Intermittent generators

Medium Impact:
ELEXON and the Transmission Company

Low Impact:
Impact on the Central Registration Agent and Central Data Collection Agent

Panel paper number

P240
Draft Mod Report

12 November 2009

Version 0.2

Contents

1	Summary	3
2	Why Change?	5
3	Solution	6
4	Impacts & Costs	8
5	Implementation	12
6	The Case for Change	13
7	Panel Discussions	16
8	Panel's Initial Recommendations	17
9	Further Information	17
Attachment **A**: Additional Information		17
Attachment **B**: Legal Text Proposed		17
Attachment **C**: BSCP Changes Proposed		17
Attachment **D**: Consultation Questions		17

About this document:

This document is a Draft Modification Report, which ELEXON is issuing for a Report Phase Consultation. **Attachment A** provides additional supporting details of the Modification Group's assessment of P240.

The consultation seeks your views on:

- The Panel's initial recommendation as to whether the change should be made;
- The Panel's recommended implementation approach; and
- The Panel's proposed redlined changes to the BSC (**Attachment B**) and to Balancing and Settlement Code Procedure (**Attachment C**).

This is the final opportunity to comment on P240 before it is submitted to the Authority. The Panel invites you to respond to the questions in the attached response form (**Attachment D**).

The Panel will consider your response at its meeting on 10 December 2009, when it will agree its final recommendations. ELEXON will then submit a Final Modification Report to the Authority.

You can download further P240 documents here, including the Transmission Company's impact assessment and copies of the full industry responses to the Group's previous Assessment Consultation.

Any questions?

Contact:
Bu-Ke Qian

bu-ke.qian@elexon.co.uk

020 7380 4146

1 Summary

Why Change?

Currently the BSC does not allow Generating Plant to be moved from one BM Unit to another in operational timescales, except by re-registering the BM Units which takes up to 30 Working Days.

The Issue

For offshore wind farms that have multiple connections to shore, there are a number of scenarios in which a Party may wish to switch the output of individual Wind Turbine Generators from one connection to another (e.g. in response to faults or maintenance). The rules governing BM Unit configurations in Section K of the BSC do not support this capability.

Solution

P240 proposes to amend Section K of the code to allow plant and apparatus that comprise Power Park Strings to be moved between BM Units in operational timescales. The arrangements would apply in the case where Exports from and/or Imports to Plant and Apparatus may be electrically switched between transmission connections.

Impacts & Costs

P240 will require changes to the BM Unit registration process, which is set out in Section K3 of the BSC to enable plant and apparatus to 'switch' between BM Units in operational timescales.

The costs of implementing these changes will be 14 man days (**£3.3K**) of ELEXON effort. The costs for BSC Agent to deliver the manual solution (that allows switching between multiple sets of Aggregation Rules) will be **£4K**.

There are no implementation costs for the Transmission Company.

Related changes

P240 progresses one of the recommendations of the **Issue 37**[1] Group. This Group considered 4 issues with the BSC metering and BM Unit requirements, including two related Offshore generation issues that are being progressed as Modifications:

Modification Proposal P237[2] would allow an Offshore intermittent generator to register two or more of its Power Park Modules as a single BM Unit; and

Modification Proposal P238[3] would allow Offshore Power Park metering to be installed on the offshore platform at a location other than each commercial Boundary Point to determine the Exports (or Imports), provided that appropriate compensation is applied to meter readings to account for losses between the location of the metering and the commercial boundary.

Implementation

The Group agreed that the manual solution of switching of Aggregation Rules does not require any system changes, the implementation date for BSC/BSCP changes should be **5**

Where can I find full technical definitions of these terms?

You can find the full BSC definitions of Power Park Module, Generating Unit and BM Unit in Annex X-1 and Section K3.

All Grid Code definitions are contained in the Grid Code Glossary and Definitions.

[1] 'Boundary Point Metering and BM Unit Issues in Section K'
[2] 'Standard BM Unit configuration for Offshore Power Park Modules'
[3] 'Removal of the requirement to meter each Boundary Point for Offshore Power Park Modules'

WDs after an Authority decision (in alignment with the implementation date of Mod P237/238).

This approach is supported by the Group, the Transmission Company and by all respondents to the Group's Assessment Consultation.

The Case for Change

The Group's final view is that implementation of P240 would better facilitate Applicable BSC Objectives (b) and (c).

The Group also agreed that there are wider benefits when combined P240 with P237 and P238.

Recommendation

The Panel therefore unanimously recommends that P240 should be approved.

2 Why Change?

The Grid Code allows for Power Park Units (PPU i.e. generating unit) to be switched from **Power Park Module** (PPM) to PPM (Planning Code A.3.2.2 (k)). This is considered an operational change, with a simple operational notification to the GB System Operator of the number of Power Park Units (PPUs) of each different type on each PPM that is changed.

However the BSC, in Appendix K3.1.3, prohibits Plant and Apparatus from being comprised in more than one BM Unit. The change of a PPU from PPM to another PPM may be seen as changing Plant and Apparatus from one **BM Unit** to another.

Under the current arrangements, the BSC would not allow strings of turbines to be switched from one transformer to another without going through a **re-registration process** (with a lead time of at least 30 Working Days)

The time scale and the need for a re-registration process may pose a significant issue for certain offshore wind farms included in the new Offshore Transmission Regime where output can be electrically switched between transmission connections.

Background and related changes

On the 14 May 2009 we presented a paper to the BSC Panel on two issues relating to metering requirements for Combined Cycle Gas Turbine (CCGT) Modules and PPMs. One of the issues identified was the inability to switch assets between BM Units. The BSC Panel raised **Standing Issue 37** (Boundary Point Metering and BM Unit Issues in Section K). The Issue 37 Group met on the 3rd and 27th June 2009 and identified potential solutions to these issues.

The Group agreed that there are a number of scenarios in which wind farms with more than one connection to shore may wish to switch the output of certain Wind Turbine Generators from one connection to the other. This would typically occur when one of the offshore circuits cannot be used (due to faults or maintenance), and the generator therefore wishes to reconfigure the network to make full use of the remaining capacity.

The Group agreed that the BSC does not currently allow this type of operational reconfiguration and therefore agreed that the current BSC drafting will severely constrain the ability of Generators with more than one connection to shore to maximise their generation during conditions of network fault or maintenance.

Re-registration process

The BM Unit re-registration process takes about 30 working days, and may therefore not be a practical way to manage a short-notice operational reconfiguration (for example, in response to a fault). The BSC only allows Plant/Apparatus to be contained in one BM Unit at a time.

3 Solution

Modification P240 proposes that the BSC should be amended to support the Grid Code provisions for switching of Power Park Units between Power Park Modules (and hence between BM Units). Where the Grid Code permits a Power Park Unit to move from one BM Unit to another, the BSC and its associated Settlement processes should not prevent this.

Although this issue was identified in relation to Offshore Power Park Modules, it potentially applies onshore as well. The proposed P240 solution therefore applies to **all Power Park Modules**. This is also consistent with the Grid Code provisions for submission of a **Power Park Module Availability Matrix** (which is designed to achieve certainty in knowing the number of Power Park Units Synchronised to meet the Physical Notification and to achieve a Bid-Offer Acceptance) to the Transmission Company.

Notification of When Switching Takes Place

The Modification Group discussed whether a new process was required to inform BSC Agents and/or BSC Parties when a Power Park Unit is switched between BM Units, but concluded that no new processes are required.

No change is required to Settlement as a result of switching (except when **Aggregation Rules** change, which is discussed separately in Attachment A section 2), and for that reason there would be no benefit in a new requirement to notify BSC Agents of switching.

If a switching event changes the expected output of a BM Unit, this will be notified to Parties through the existing processes for reporting of Physical Notifications and Maximum Export Limits. The Modification Group concluded that this is sufficient, and therefore no additional notification from Parties is required.

What are Aggregation Rules?

Aggregation Rules are rules submitted by the Lead Party of a BM Unit that specify which meter registers should be aggregated to derive the Metered Volume for that BM Unit.

Changes to Aggregation Rules

Where changes of Aggregation Rules are required, the Group agreed the insertion of Section R3.2.5A of the BSC (please refer to Attachment B draft Legal Text for more details) would clarify the new process:

- When first registering the Aggregation Rules, the Lead Party would provide more than one set of Aggregation Rules, each reflecting a different operating configuration;
- Each set of Aggregation Rules would be validated in accordance with normal procedures;
- When the operating configuration of the site changed, the Lead Party would fax/email the CDCA with details of which pre-validated configuration was to be used, and the time at which it would come into effect. The CDCA would then update central systems (prior to Interim Information Volume Allocation Run) to use the stated Aggregation Rule.

The BSC Agent impact assessment has identified a constraint in the CDCA software that prevents changes to Aggregation Rules from becoming effective at any time other than the start of a Settlement Day (i.e. midnight). Removing this constraint would require significant changes to the CDCA software, the cost of which has been assessed at £63k. The Modification Group do not believe that there is a clear case for making this investment, and the detailed proposed solution can be found in section 2 of Attachment A.

The Modification Group envisages the process will be invoked infrequently. If it turns out to be used more frequently, it may be appropriate to reconsider whether to amend the

CDCA software. The Group notes that ELEXON would have the power to propose such a change (in accordance with BSCP40).

Has the Group identified any other solutions?

The Modification Group has not identified any alternative solution which it believes might better address the issue.

4 Impacts & Costs

The impact on Settlement processes of Power Park Units moving between BM Units depends to a large extent on whether the BM Unit Aggregation Rules are affected:

- If no changes to the Aggregation Rules are required, there will be minimal impact on Settlement processes. As explained in below, the view of the Modification Group is that no additional notification to Settlement will be required. For this type of BM Unit, P240 is essentially a 'documentation only' change that amends the BSC legal text to remove barriers to switching of Power Park Units between BM Units.
- Where a change of Aggregation Rules is required, additional processes will be required to support this. Example configuration 2 in section 2 Attachment A illustrates a configuration that would fall into this category (assuming metering was placed on the ownership boundary).

BSC Impact

Changes to the BSC

Where changes of Aggregation Rules are required, the Group agreed the insertion of Section R3.2.5A of the BSC (please refer to Attachment B draft Legal Text for more details) would clarify the new process.

Changes to BSCP03[4]

The changes to BSCP03 include adding a new process 'data correction of a BM Unit in a Switching Group' to allow a Lead Party to request correction for an error that has occurred in Trading Charges as a result of the CDCA not applying the Aggregation Rules for a Switching Group until midnight following the time of the change.

Changes to BSCP15[5]

The changes to BSCP15 are minor and include adding a new check box 'a change in the Switching Group to which the BM Unit belongs' in BM Unit registration (BSCP75/4.1) so that the initial registration form has provision to indicate whether a BM Unit belongs to a Switching Group (per BSC Section K 3.2.3). A new table 'Switching Groups' along with an example have been added in BSCP75/4.1 'Registration of BM Unit' to allow input of which BM Units are within a Switching Group.

Changes to BSCP75[6]

The changes to BSCP75 include adding a new process 'Notification of Operational Switching'. This process is applicable to Power Park Module BM Units that are capable of operational switching.

A new form 'BSCP75/4.4 Election of Pre-Registered Aggregation Rule for Switching Group' has been added to elect to switch Aggregation Rules for the following BM Units (in order to reflect a change in operational configuration).

BSCP changes

ELEXON will consult on both the legal text and redlined BSCP changes during the **Report Phase** for P240.

[4] BSCP03 – 'Data Estimation & Substitution for Central Volume Allocation'
[5] BSCP15 – 'BM Unit Registration'
[6] BSCP75 – 'Registration of Meter Aggregation Rules for Volume Allocation Units'

Grid Code Impact

ELEXON does not anticipate that any changes will be required to the Grid Code. The Transmission Company also confirmed the P240 solution and legal text are consistent with the Grid Code requirements. Detailed Transmission Company impact assessment responses can be found here.

National Grid confirmed via assessment consultation that:

- P240 will not impact National Grid's ability to discharge its obligations efficiently under the Transmission Licence. Allowing wind energy to export onto the National Electricity Transmission System which would otherwise have been 'sterilised' due to outage conditions will have no additional effect on National Grid's ability to operate an efficient, economical and co-ordinated system when compared with the situation that would have prevailed had the energy not been sterilised in the first place;
- P240 will not impact National Grid's systems or processes, with the exception of a potential desire for additional information provision under the Grid Code;
- P240 will not introduce any additional issues relating to security of supply. National Grid does not expect to incur additional operational costs or benefits as a result of the implementation of P240 over and above those that would have been incurred anyway were it not for the fact that, without P240, an outage would sterilise some of the energy capability of an offshore power park module. National Grid does not expect to incur any implementation costs associated with P240; and
- National Grid is considering whether it desires additional information regarding offshore power park module availability configurations over and above those catered for in Grid Code BC1.A.1.8.1. Note that any such Grid Code changes would be stand-alone and the implementation of P240 would not be contingent on them being in place.

Generation Capacity Impact

Section K3.4 requires the Lead Party of a BM Unit to notify a Generation Capacity that represents its view 'in good faith and as accurately as it reasonably can' of the maximum expected generation for a BSC Season.

If unexpected switching of Power Park Units between BM Units causes one of the BM Units to exceed its notified Generation Capacity, the existing provisions of K3.4.3 will require the Party to re-notify a higher value. The Modification Group believe that these existing provisions are adequate, and that no changes to the process are required (particularly as Generation Capacity data is no longer used for assessing Generator's Credit Cover requirements, following implementation of Modification P215 'Revised Credit Cover Methodology for Generating BM Units').

BSC Costs

The costs of implementing P240 are 14 man days (**£3.3K**) of ELEXON effort to implement the BSC/BSCP changes.

BSC Party Costs

The Lead Party for a BM Unit would be required to notify CDCA when the operating configuration of the site changed. The Lead Party would fax/email the CDCA with details of which pre-validated configuration needed to be used, and the time at which it would come into effect. The only impact would be for BSC Parties with BM Units that have additional Aggregation rules to update their internal processes for notifying CDCA.

BSC Agent Costs

The BSC Agent has provided an impact assessment that sets out how a change in Aggregation rules arising from a switching event would impact the CDCA systems.

The Group used an assumption that no more than 10 switching events per year would be made and therefore the assessment included a manual solution as well as an automated solution to understand the difference in costs. The assumption of 10 events is based on the fact that there are very few configurations that could currently switch and that switching would occur for maintenance and occasional faults.

The Group's preference is for a manual solution to enable the switching of Aggregation Rules with an ability to make changes effective from times other than midnight in a manual process. The cost of this solution will be **£4K**. Further information is provided below:

- The BSC Agent provided the two options for supporting switching between multiple sets of Aggregation Rules:

Solutions that allow switching between multiple sets of Aggregation Rules		
Option	Description	Cost
1) Manual Solution for Switching of Aggregation Rules	P240 implementation with no system changes. Aggregation rules to change on a Settlement Day basis only (i.e. from Settlement Period 1 on the day after the switching event occurred)	**£1.3K**
2) Semi Manual Solution	Introducing functionality that would make use of the existing copy function within the CDCA system to simplify the process of switching to an alternative rule as all rules would be entered into the system and only need copying forwards upon notification to use an alternative rule.	**n.a.** [7]

- As the BSC Agent Impact Assessment indicated that the cost of option 2 would be disproportionately high, the Modification Group chose option 1 over option 2.
- The impact assessments also identified a constraint in the current system that requires Aggregation Rule changes to come into effect at midnight. Two options for addressing this were identified:

Solutions that allow Aggregation Rule changes to come into effect within day		
Option	Description	Cost
3) System Changes for Switching Within Day	Introducing Period boundary for Aggregation Rules processing into the CDCA System.	**£63K**
4) Manual Solution for Switching Within Day	Using meter reading estimation to correctly allocate energy between BM Units for Settlement Periods where the 'incorrect' rule was present in the system. This would only be done where the incorrect allocation of	**£2.7K**

[7] In order to allow BSC Agent to store multiple rules on the CDCA system, a coding change on the Maintain Aggregation Rule Form would be required. The cost for this change will be substantive and could not be justified by the Group. No firm price was therefore provided.

BSC Agent Impact Assessment

More detailed BSC Agent Impact Assessment can be found in section 3 of Attachment A.

	energy resulted in a material impact on any BSC Party, and the process for doing so would be described in BSCP03[8].	

- The impact assessment also flagged up the second (unrelated) question of whether there should be a mechanism for making changes effective at times other than midnight. The options here are: Only allow changes at midnight (i.e. option 1 only), in which case there's the potential for material impact on Trading Charges (e.g. non-delivery charges). The Group felt that this would be inappropriate, as Parties could (on rare occasions) be exposed to spurious charges through no fault of their own.
- An automated solution for making changes effective at times other than midnight (i.e. option 1 + option 3). The Group felt that this would also be inappropriate, as the situation the solution is trying to address is too rare to justify an expensive automated solution.
- A manual solution for making changes effective at times other than midnight (i.e. option 1 + option 4). This is relatively inexpensive, and avoids the risk of exposing Parties to spurious charges, and is therefore the preferred solution.

[8] BSCP03 - 'Data Estimation and Substitution for Central Volume Allocation'

5 Implementation

When will P240 be implemented?

The Group's final view is that the Implementation Date of P240 should be **5 Working Days** after Approval is received from the Authority. All the consultation responses support this approach as no central system changes should be required.

The Group has developed the BSCP03, BSCP15, BSCP 75 and BSC changes during the Modification Process, and invites the Panel to approve these changes (Attachment C) alongside the BSC legal text (Attachment B).

Examples of Offshore Aggregation Rules to BSCP75

The Modification Group also noted BSCP75 contains example Aggregation Rules for various different configurations of generator Plant and Apparatus. These include configuration diagrams which show how the location of metering, and the number of BM Units, affects Aggregation Rules.

At present, BSCP75 only includes example Onshore configurations. However, ELEXON and the Group agree that it would be useful for the BSCP to also include some Offshore examples, to give Offshore generators guidance on how to submit their Aggregation Rules.

The Group notes that what these examples will look like depends on whether P237 and/or P238 are also approved by the Authority. For example, P238 will affect where the metering is shown in the diagrams.

The Group therefore agrees with ELEXON's suggestion that, once it has received the Authority's decisions on each of the current Offshore Modification Proposals, ELEXON will raise a separate Change Proposal to add examples of Offshore Aggregation Rules to BSCP75.

The Group notes that, since the diagrams shown in the BSCP are only guidance, the absence of Offshore examples in the interim will not significantly impact Offshore development.

Consultation Question: Legal text and BSCP changes
Do you agree that the Panel's recommended legal text and BSCP changes deliver the solution agreed by the Modification Group?
The Panel invites you to give your views using the response form in Attachment D.

Consultation Question: Implementation approach
Do you agree with the Panel's recommended Implementation Date (for both the BSC and BSCP changes) of 5 Working Days after an Authority decision?
The Panel invites you to give your views using the response form in Attachment D.

Group's discussions

The Group notes that the Grid Code allows for plant to be switched if it forms part of a Power Park Module. The BSC rules currently conflict with these provisions. There is no clear reason why the Settlement rules should prevent switching for Power Park Modules, particularly as the operational requirements allow for switching to occur.

This is a clear benefit to both the System Operator (SO) and the BSC Party in having its generated output made available to the system. Preventing switching could deprive the SO of volumes that could assist in managing the system. Additionally the Party can ensure the maximum available output can be delivered allowing it to meet any contractual obligations. Loss of output from a Power Park Module will impact the amount of energy that would be delivered from renewable sources, thus impacting broader energy efficiency targets.

In relation to the circumstance where a change in Aggregation rules would be required the Group noted that the Code already allows for multiple aggregation rules to be held for Range CCGT Modules[9] (Section R 3.2.5).

However the Central Registration Agent has never been asked to apply multiple aggregation rules for a CCGT unit. The systems cannot currently automatically process changes to the Aggregation Rules for a BM Unit.

The Group discussed whether the switching activity should be restricted to **Lead Party** and concluded that since the Lead Party takes responsibility to inform changes to the BM Units, P240 should only apply to BM Units of the same Lead Party (i.e. you cannot switch generating units between two Parties). The Transmission Company and all respondents to the Group's consultation support this approach.

Further, the Group noted all respondents supported proposed solution, and the changes to the BSC and subsidiary documents.

What is Lead Party?

Lead Party is the Party registered or to be registered in respect of the BM Unit.

Consultation Question: Combined benefits of P237, P238 and P240
The Group believes that switching should be restricted to Power Park Modules only in order to remain consistent with the Grid Code. Do you agree?
The Panel invites you to give your views using the response form in Attachment D.

Consultation Question: Combined benefits of P237, P238 and P240
The Group believes that P240 should only apply to BM Units of the same Lead Party. Do you agree with this conclusion?
The Panel invites you to give your views using the response form in Attachment D.

Potential Benefits

For offshore wind farms, the inability to 'switch' under the current arrangement could cause significant loss of revenue due to being restricted from re-directing its output.

[9] A CCGT Module where there is a physical connection by way of a steam or hot gas main between that CCGT Module and another CCGT Module or other CCGT Modules, which connection contributes (if open) to efficient modular operation, and which physical connection can be varied by the operator.

The Modification Group quantified the benefits for P240 as follows. In the circumstance where a fault prevents the output from a number of the turbines on a Power Park Module and this fault took 30 Working Days (hence 42 calendar days as the turbines turn everyday) to fix, the following loss in revenue could occur.

Assume the combined output is 150MW and the load factor (average output of energy) is 40% at a price of £50 per MWh the loss would be:

£50/MWhour*150MW*40%*24 hours/day* 42 days = **£3 million per switching event**

Switching output ensures that the appropriate Renewable Obligation benefits can be available to the generator (and purchaser of ROCs) for the available volumes.

Group's views of P240 benefits

The Group believes that P240 will better facilitate the achievement of **Applicable BSC Objectives (b) and (c)**. Further details are given in the table below.

Group's view of benefits of P241 against the Applicable BSC Objectives	
Description of Objective	Identified benefit
a) Efficient discharge of the obligations of the Transmission Licence.	None identified.
b) Efficient, economic and co-ordinated operation of the GB transmission system.	By allowing the assets to be switched between BM units for operational reasons, P240 will promote the efficient, economic and co-ordinated operation of the national electricity transmission system. Availability to System Operator of volume that would otherwise be unavailable to help balancing due to inability to switch.
c) Promoting effective competition in the generation and supply of electricity and in the sale and purchase of electricity.	P240 would remove issues related to the re-registration process (in order to allow Generating Plant to be switched between BM units) for some new Offshore Transmission Regime where output can be electrically switched between transmission connections (as this will comprise most new build of PPM). Parties can sell their output through switching volumes, and not incur loss of revenue.
d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.	None identified.

The Group identified an equal weighting between Objective (b) and (c).

One Group Member highlighted the environmental benefit of P240 after assessment consultation. For offshore wind farms, the inability to 'switch' under the current arrangement restricts the generation of the renewable energy. Since P240 proposes to remove such restriction from re-directing offshore wind farms' output, therefore would help to reduce the **carbon emission** caused by non-renewable energy. The Group

agreed with this benefit and all respondents of the assessment consultation believed it would better facilitate Objective (b).

Consultation Question: Applicable BSC Objectives
Do you agree with the Panel's initial recommendation that P240 will better facilitate the achievement of Applicable BSC Objectives (b) and (c) when compared with the existing BSC requirements and that P240 should therefore be approved?
The Panel invites you to give your views using the response form in Attachment D.

Group's views regarding benefits of P240 when combined with P237/P238

The P240 Modification Group has also assessed two other proposals relating to the configuration of BM Units for Offshore Power Park Modules (P237) and the requirements for Metering for Offshore Power Park Modules (P238). The Assessment and Report consultations for these Modifications have been issued and responses from industry indicate that the ability to switch can be more effective if it is combined with the less onerous requirements for registering BM Unit configurations and Metering.

The Group agreed that there are wider benefits when combine P240 with P237 and P238. For example, the number of occasions requiring the use of P240 will be reduced if P237 is approved, as the switching of plant and apparatus between power park modules might be able to take place within the same BM Unit. If P238 is approved, the potential for impact on meter aggregation may be reduced.

The Group remains convinced that, whilst P240 is an appropriate change in isolation it can deliver wider benefits when combined with P237/238. The discussion and examples of where the combined benefits can occur are detailed here:

P237 Assessment Report (page 14)
P238 Assessment Report (page 11 to 12)

Consultation Question: Combined benefits of P237, P238 and P240
Do you agree with the additional combined benefits of P237, P238 and P240 which are identified in Attachment A?
The Panel invites you to give your views using the response form in Attachment D.

7 Panel Discussions

Panel's consideration of Assessment Report

The Panel considered the Group's Assessment Report at its meeting on 12 November 2009.

The Panel **unanimously** agreed with the Group, the Transmission Company and Assessment Consultation respondents that:

- P240 will better facilitate the achievement of **Applicable BSC Objectives (b), and (c)**;
- An Implementation Date of **5 Working Days** is appropriate, as it will remove the requirement to use the re-registration BM Unit process as soon as possible; and
- The draft legal text and BSCP03/15/75 changes deliver the solution agreed by the Group and (subject to any industry comments received in the Report Phase Consultation) are appropriate.

The Panel's initial unanimous recommendation was therefore that P240 should be approved.

The Panel did not raise any additional views or comments.

8 Panel's Initial Recommendations

The Panel initially recommends:

- That Proposed Modification P240 **should** be made;
- An Implementation Date for Proposed Modification P240 of 5 Working Days after an Authority Decision;
- The draft BSC legal text for Proposed Modification P240 contained in Attachment B; and
- The draft redlined changes to BSCP03, BSCP15 and BSCP75 contained in Attachment C.

Recommendation

The Panel's initial unanimous recommendation is that the Proposed Modification P240 should be made with an implementation date of 5 Working Days after an Authority Decision.

9 Further Information

More information is available in:

Attachment **A**: Additional Information

Attachment **B**: Legal Text Proposed

Attachment **C**: BSCP Changes Proposed

Attachment **D**: Consultation Questions

A complete version of the Report Phase consultation received, the P240 Assessment Report, and all other related document are available on the P240 page of the ELEXON website.