

P231 Report Phase Consultation Responses

CPC00656 - Impact Assessment of P231'Black Start and Fuel Security Procedures under the Balancing and Settlement Code (BSC)'

Consultation Issued on 25 February 2009

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	SAIC on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd		7	n/a
2.	E.ON UK		7	n/a

Question 1: Would Proposed Modification P231, as outlined in the attached Requirements Specification, impact your Organisation?

Summary

Yes	No	Neutral/Other
2	-	-

Responses

Respondent	Response	Rationale
SAIC	Yes	--
E.ON UK	Yes	--

Question 2: If impacted by the Proposed Modification, please provide (in a reasonable level of detail) a description of:

- **The impact, and any resulting changes required to your systems and/or processes;**
- **The costs of the above, broken down if possible between the different areas of impact; and**
- **The timescales which your organisation would require to implement the Proposed Modification (from an Authority decision).**

Summary

Yes	No	Neutral/Other
-	-	-

Responses

Respondent	Response	Rationale
SAIC	--	There would be changes to Local Working Instructions and procedures. It is anticipated that the changes (and associated costs) would be minimal. We would require 1 working day to implement.
E.ON UK	--	Minimal changes should be required to our procedures in order to cope with a Fuel Security Code or Black Start event in line with the P231 solution to handle the period, return to normal market operations and the new Settlement and Payment calendar. However processes would need updating and hardcopies as well as electronic copies of the BSCP and associated instructions keeping updated. It would be useful if the latest versions of all such emergency instruction documents were available together on a website to make straightforward for Parties to check they have the latest versions in electronic and hardcopies.

Question 3: The Modification Group has suggested that participants may wish for a testing period during a Black Start period (please refer to section 4.7 of the P231 Requirements Specification/Consultation document), to ensure that communications are possible between participant systems and BSC systems. These would be subject to the costs for implementing such a solution

- **The impact, and any resulting changes required to your systems and/or processes; and**
- **The costs of the above, broken down if possible between the different areas of impact.**

Summary

Yes	No	Neutral/Other
-	-	-

Responses

Respondent	Response	Rationale
SAIC	--	The impact depends on whether the testing will either be: With the current "live" systems; or With a separate set of "test" systems. If the testing were to be with the current live systems (with appropriate wiping afterward), then there will be minimal costs associated. With another set of systems, there would be larger, but still relatively minor costs associated with re-configuring our systems to talk to the test systems (and configure back again).
E.ON UK	--	A testing period might be beneficial to ensure all Parties are ready for resumption of normal operations, but only if this had clear criteria. There would be little point in allowing some time for Parties to test unless the results were going to have an impact, being taken into account for instance in deciding whether to revise point K. However the resumption of the market should not be held up if the bulk of Parties are ready but a few still have problems communicating with central systems. We would suggest that around 85-90% of units being capable of generating would be a possible threshold. The costs of any testing would be justified given the potential costs of imbalance if participants were unable to communicate and submit notifications as required.

Question 4: Any further comments on P231?

Summary

Yes	No	Neutral/Other
-	2	-

Responses

Respondent	Response	Rationale
SAIC	No	--
E.ON UK	No	--