

Stage 03: Transmission Company's Analysis & Impact Assessment

P237: Standard BM Unit configuration for Offshore Power Park Modules

Response Form

The Modification Group requests your impact assessment of P237.

In particular, the Group asks you to respond to the following questions, giving your reasons for each answer.

Transmission Company Questions

Question 1:

The Group considers that the specific issue which P237 identifies is limited to Offshore generator configurations.

It therefore believes that P237 creates no disadvantage for Onshore intermittent generators.

You can find further information in Section 2 of the main consultation document and in Sections 1 and 3 of Attachment A.

Do you agree with the Group's view? Why is this?

Please give your response: Yes

Insert rationale here

National Grid believes that the specific issue which P237 seeks to address is limited to Offshore generator configurations due to the difference between Grid Code definitions for Offshore and Onshore Power Park Modules. National Grid agrees that, whilst some Onshore generators may have historically had similar configuration issues (which have been handled through the use of non-standard BM Unit configurations), this is a legacy issue arising from pre-BETTA designs. Hence, looking forward, Onshore generators should not be disadvantaged by P237.

Question 2:

The Group believes that P237 will better facilitate the achievement of **Applicable BSC Objectives (b), (c) and (d)** when compared with the existing BSC requirements.

You can find more information in Section 5 of the main consultation document.

Do you agree with the Group's view? Why is this?

Please give your response: Yes

Insert rationale here

National Grid believes that P237 will better facilitate applicable BSC objective (b) by allowing sufficient controllability of Offshore Power Park Modules whilst at the same time minimising the volume of data required to be submitted, both by the generator (e.g. physical notification data) and National Grid (e.g. bid-offer acceptance data).

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase



Your response

We ask you to respond to the questions in this form.



How to return your response

Please email your response to: modifications@elexon.co.uk by 5pm on Tuesday 11 August 2009.

P237
Transmission Company
Analysis

28 July 2009

Version 1.0

Page 1 of 4

© ELEXON Limited 2009

Question 2:

National Grid believes that P237 will better facilitate applicable BSC objective (c) by allowing both Offshore and Onshore Power Park Modules to participate in the Balancing Mechanism on an equivalent basis.

National Grid agrees that minimising the number of BM Units BSC Agents have to accommodate will better facilitate applicable BSC objective (d).

Question 3:

The Group believes that the combined benefits of P237 and P238 will be greater than those which arise individually from each proposal.

Although P240 has yet to receive further assessment, the Group believes it is likely that this will also have additional benefits in combination with P237/P238.

You can find more information in Section 5 of the main consultation document and in Section 3 & Appendix 1 of Attachment A.

Do you agree with the Group's view? Why is this?

Please give your response: Yes

Insert rationale here

Whilst National Grid believes that P237 offers benefits in its own right, we consider that the combined benefits of P237, P238 and the yet-to-be-considered P240 are likely to be greater than if P237 were implemented in isolation as they each address a different facet of a more efficient overall solution.

Question 4:

The Group believes that the P237 changes to the BSC and BSCP15 should be implemented **5 Working Days** after an Authority decision.

It believes that ELEXON should raise a separate Change Proposal to introduce examples of Offshore Aggregation Rules to BSCP75 once the Authority has made its decisions on all of the current Modification Proposals which relate to Offshore requirements.

You can find more information in Section 4 of the main consultation document.

Do you agree with the Group's implementation approach? Why is this?

Please give your response: Yes

Insert rationale here

National Grid agrees that the proposed approach represents a pragmatic way forward (assuming no material BSC system changes are required) as it ensures non-critical changes do not impact on implementation timescales.

Question 5:

Will P237 affect your ability as the Transmission Company to:

- Discharge your obligations efficiently under the Transmission Licence; and/or
- Operate an efficient, economical and co-ordinated National Electricity Transmission System?

If yes, how?

Please give your response: No (i.e. no adverse effects)

Insert rationale here

The changes proposed by P237 will not adversely affect our ability to discharge our obligations under the transmission licence or to operate an efficient, economical and co-ordinated National Electricity Transmission System. Rather, they will streamline processes associated with the receipt and transmission of data and simplify the process of issuing

Question 5:

bid-offer acceptances, thereby having a positive impact.

Question 6:

Will P237 impact your computer systems or processes?

If so, how?

Please give your response: No

Insert rationale here

P237 will have no impact on our computer systems. We do not expect that P237 will have a material impact on the existing processes we have associated with BM Units.

Question 7:

Does P237 cause you any potential issues relating to security of supply?

If so, what are these?

Please give your response: No

Insert details here

We do not envisage P237 to cause any issues relating to security of supply.

Question 8:

If P237 is implemented, will you:

- Incur any implementation/operational costs; or
- Achieve any ongoing operational cost savings and/or efficiency benefits?

If yes, why is this?

Please give specific examples and cost details where possible.

Please give your response: Yes (savings), No (costs)

Insert details here

National Grid does not believe it will incur costs associated with the implementation of P237. There are likely to be minor efficiency gains as a result of receiving fewer physical notifications and issuing fewer bid-offer acceptances.

Question 9:

The Group believes that:

- P237 will not require consequential changes to any Core Industry Documents and/or the System Operator-Transmission Owner Code; and
- Its solution is consistent with the Grid Code's requirements for Power Park Modules.

Do you agree with the Group's view? Why is this?

Please give your response: Yes

Insert rationale here

National Grid agrees that P237 will not require consequential changes to other Core Industry Documents.

Question 10:

Do you believe that there are any alternative solutions to the issue which the Group has not identified, and which it should consider?

Question 10:

If yes, what are these?

Please give your response: No

Question 11:

Do you have any further comments on P237 that you would like the Group to consider?

Please give your response: Yes

National Grid has further investigated whether the example Offshore Power Park configurations presented in the P237 documentation fully reflect the range of configurations that exist or may exist in the future. As a result of this investigation, we continue to be of the view that the examples presented in the P237 documentation are sufficiently representative.

Further Information

To help us process your response, please:

- Email your completed response form to modifications@elexon.co.uk
- Use the following text in the subject line of your email: "P237 Transmission Company Analysis"
- Include a phone number in your covering email, so that we can contact you if we have any questions
- Respond by **5pm** on **Tuesday 11 August 2009** (the Group may not be able to consider a late response)

The Modification Group will consider your response at its meeting on 14 August 2009, when it will make its final recommendation as to whether the change should be made. The Panel will consider this recommendation and the Group's full Assessment Report at its meeting on 10 September 2009. The Panel will then consult on its own recommendation to the Authority.