

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 send responses, entitled 'P240 Assessment Consultation' to [modifications@elexon.co.uk](mailto:modifications@elexon.co.uk) by 5pm 13 Oct 2009

## Stage 03: Transmission Company's Analysis & Impact Assessment

# P240: Switching Plant and Apparatus between BM Units

### Response Form

The Modification Group requests your impact assessment of P240.

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 believes P240 would better facilitate Applicable BSC Objectives (b) and (c). Do you agree?

#### Response:

Yes

#### Please explain the reason(s) for your view:

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National Grid believes that P240 would better facilitate Applicable BSC Objectives (b) and (c) as follows:

Applicable Objective (b): National Grid believes that it is desirable to allow wind power parks to be able to maximise their export of power to the system. P240 will avoid the sterilisation of generation capacity under outage conditions by allowing that capacity to be transferred to another BM Unit, thereby allowing the availability of wind power parks to be maximised.

Applicable Objective (c): Facilitating access to the market by allowing capacity to be transferred between BM Units should promote competition by providing the market, and National Grid, with access to additional generation capacity that would otherwise have been unavailable. This has the potential to provide National Grid with additional volumes for balancing purposes.

#### Question 2:

The Group believe switching should be restricted to Power Park Modules only to remain consistent with the Grid Code. Do you agree?

#### Response:

Yes

#### Please explain the reason(s) for your view:

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National Grid has not identified any other generation type that faces the same potential restrictions on ability to export power to the system as those faced by Power Park Modules. Hence we do not believe it is necessary to introduce the ability to switch plant and apparatus between BM Units for generation other than Power Park Modules.

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Analysis

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<b>Question 3:</b>	<b>Response:</b>
The Group believe P240 should only apply to BM Units of the same Lead Party. Do you agree with this conclusion?	Yes (broadly)

<b>Please explain the reason(s) for your view and state which Applicable BSC Objective(s) your views are based on:</b>	<b>Page Ref: 13</b>
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National Grid requires knowledge of where power will be input onto the National Electricity Transmission System and the characteristics of the plant that will generate the power. Whilst National Grid is not fundamentally opposed to the principle of switching plant and apparatus between BM Units owned by different Lead Parties, we anticipate that it would be necessary for the Lead Parties to establish suitable contractual arrangements to support the collective performance of Code obligations, along with the development of transmission access products that enable sharing to take place.

As with P240 in general, National Grid would expect the circumstances surrounding such switching activity to be tightly specified.

<b>Question 4:</b>	<b>Response:</b>
Do you support the implementation date to be 5 WDs after the Authority's decision?	Yes

<b>Please explain the reason(s) for your view:</b>	<b>Page Ref: 12</b>
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As long as P240 does not require changes to central systems, it seems appropriate that an implementation date of 5 working days after Authority decision is chosen.

<b>Question 5:</b>	<b>Response:</b>
Are you aware of any Power Park Module configuration that would require multiple aggregation rules to be held by the CDCA?	No

<b>Please give your rationale:</b>	<b>Page Ref: 13</b>
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<b>Question 6:</b>	<b>Response:</b>
Do you agree that P240 provides additional benefit when combined with P237/P238?	Yes

<b>Please explain the reason(s) for your view:</b>	<b>Page Ref: 15</b>
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National Grid agrees that, whilst P240 provides benefit on its own, there are wider benefits when combined 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.

<b>Question 7:</b>	<b>Response:</b>
Will P240 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?**

<b>Please give your response: No</b>
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**Question 7:**

P240 will not affect 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.

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**Question 8:**

Will P240 impact your computer systems or processes?

**If so, how?**

**Please give your response: No**

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 – see response to question 11.

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**Question 9:**

Does P240 cause you any potential issues relating to security of supply?

**If so, what are these?**

**Please give your response: No**

For the reasons set out in the answer to question 7, P240 will not introduce any additional issues relating to security of supply.

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**Question 10:**

If P240 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: No**

For the reasons set out in the answer to question 7, 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.

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**Question 11:**

The Group believes that:

- P240 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**

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**Question 11:**

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.

**Question 12:****Response:**

Are there alternative solutions that the Modification Group has not identified, that they should consider?

No

**Please explain the reason(s) for your view:**

**Page Ref: 8**

**Question 13:****Response:**

Do you have any further comments on P240?

No

**Please give your rationale:**

## Further Information

To help us process your response, please:

- Email your completed response form to [modifications@elexon.co.uk](mailto:modifications@elexon.co.uk)
- Use the following text in the subject line of your email: "P240 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 13 October 2009** (the Group may not be able to consider a late response)

The Modification Group will consider your consultation response at its next meeting. Once it has completed its assessment of P240, it will draft the Assessment Report, and present it to the November Panel meeting.