

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase



#### Your response

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



#### How to return your response

Please send responses, entitled 'P241 Transmission Company Analysis' to [modifications@elexon.co.uk](mailto:modifications@elexon.co.uk) by 5:00pm on Monday 12 October 2009

## Stage 03: Transmission Company Analysis

# P241: Relaxation of Requirement to Separately Meter Licensable Generating Units

### Response Form

The P241 Modification Group requests your impact assessment of P241. In particular, we ask for your responses to the following questions and your reasons for those responses.

### Transmission Questions

#### Question 1:

Please describe the impact(s) of the Proposed Modification on your ability as a Transmission Company to discharge your obligations efficiently under the Transmission Licence and to operate an efficient, economical and co-ordinated transmission system.

#### Please give your response:

National Grid does not expect P241 to have any impact on our ability to discharge our obligations efficiently under the Transmission Licence, as it seeks to preserve the status quo.

#### Question 2:

Please outline your views and rationale on whether the Proposed Modification would help to achieve the applicable BSC Objectives.

#### Please give your response:

National Grid believes that the section K drafting introduced by P162 inadvertently created a more onerous requirement to meter plant within CCGT modules than is actually necessary.

National Grid agrees with the Group's view that removing the requirement to install and maintain meters on licensable generating units within CCGTs (i.e. where meters are not required for settlement purposes) would remove an obstacle to market participation and hence better facilitate Applicable Objective (c).

National Grid also agrees with the Group's view that removing the requirement to install and maintain meters would also remove the need to read the meters and process/administer the administered data, thereby better facilitating Applicable Objective (d).

#### Question 3:

Please outline the impact of the Proposed Modification on the computer systems and processes of the Transmission Company. Include details of any changes needed as a result of implementing the Proposed Modification.

P241  
Transmission Analysis  
Form

1 October 2009

Version 1.0

Page 1 of 2

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### Question 3:

Please give your response:

As P241 seeks to maintain the status quo, it will not impact National Grid's computer systems or processes.

### Question 4

Please outline any potential issues relating to security of supply arising from the Proposed Modification.

Please give your response:

As P241 seeks to maintain the status quo, it will not cause National Grid any issues in relation to maintaining security of supply.

### Question 5:

Please provide an estimate of development, capital and operating costs in appropriate detail which you as a Transmission Company anticipate that you would incur in implementing the Proposed Modification.

Please give your response:

National Grid will not incur any costs associated with the implementation of P241.

### Question 6:

Please provide details of any consequential changes to Core Industry Documents and/or the System Operator Transmission Owner Code that would be needed as a result of implementing the Proposed Modification.

Please give your response:

As P241 seeks to maintain the status quo, National Grid does not believe any changes to other core industry documents will be required as a result of implementing P241.

### Question 7:

Would you like to make any other comments on P241?

No.

### Any questions?

If you have any queries on about the consultation form, please contact Dean Riddell on **020 7380 4366** or **dean.riddell@elexon.co.uk**



## 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: "P241 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 Monday 12 October 2009 (the Modification Group may not be able to consider late responses)

The Modification Group will consider your response at its next meeting. Once the Group has completed its assessment of P241, it will draft the Assessment Report, and present it to the November Panel meeting.

P241  
Transmission Analysis  
Form

1 October 2009

Version 1.0

Page 2 of 2

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