Stage 03: Assessment Consultation

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

P241: Relaxation of Requirement to Separately Meter Licensable Generating Units

The Code requirement to separately meter licensable Generating Units applies to Generating Units in a Combined Cycle Gas Turbine (CCGT) Module, even though the Code considers CCGT Modules as single BM Units; existing CCGT Modules may be non compliant without additional metering.

P241 argues this has no Settlement benefit and aims to amend the Code to exclude Generating Units in CCGT Modules from the requirement to separately meter licensable Generating Units. This was recommended by the Issue 37 Group.

The P241 Modification Group initially recommends **approval** of Modification P241 'Relaxation of Requirement to Separately Meter Licensable Generating Units'

High Impact: Generators, CCGT Module operators

Low Impact: Central Data Collection Agent, Licence Exemptable Generators, ELEXON

Contents

About this document:

The purpose of this Assessment Consultation is to obtain views or further evidence from BSC Parties and other interested parties on matters discussed in this document. The P241 Modification Group will then discuss the consultation responses before making its recommendations to the Panel on 12 November 2009.

There are 3 parts to this Assessment Consultation. This document is the first part; it provides details of the solution, impacts, costs, benefits and the potential implementation activities associated with the P241 solution.

Attachment A contains the draft legal text for the Code amendment to give effect to the P241 solution under consideration.

Attachment B is the Assessment Consultation response form, which includes all the questions highlighted in this document, as well as standard Modification consultation questions.

Any questions?

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1 Summary

Why Change?

Section K requires that Import and Export flows from licensable Generating Units are separately metered. Only Generating Units that are not licensable do not need to be separately metered.

P241 contends that separately metering licensable Generating Units in CCGT Modules has no benefit for Settlement and should not be required under the Code. P241 therefore proposes that the Code should be amended to exclude licensable Generating Units within CCGT Modules from the requirement to be separately metered.

The solution proposed by P241 would preserve the accepted industry status quo with respect to the requirements around metering CCGTs, and was recommended in the Issue 37 report.

Solution

Amend the Code to exclude Generating BM Units that comprise CCGT Modules from the Section K obligation to separately meter licensable Generating Units.

Impacts & Costs

There would be a significant impact on generators that operate CCGT Modules if P241 is **not** implemented and the requirement for separate metering is rigorously applied.

Implementation of P241 would be a Code-only change preserving the accepted industry status quo. The only costs incurred would be for ELEXON's implementation effort.

Implementation

The Implementation Date of P241 would be **5 Working Days** after Approval is received from the Authority.

The Case for Change

If P241 is not implemented, and CCGT Modules are therefore not excluded from the requirement to be separately metered, additional metering might potentially need to be installed on both new and existing CCGT installations. This would incur significant expense and would have no Settlement benefit.

Recommendations

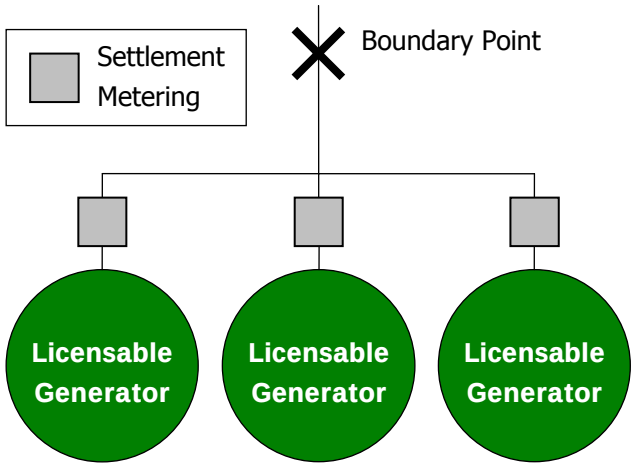
The P241 Group's initial recommendation is that Modification P241 should be approved.

The Group's initial view is that implementation of P241 would better facilitate Applicable BSC Objectives (c) and (d).

2 Why Change?

Identified Defect

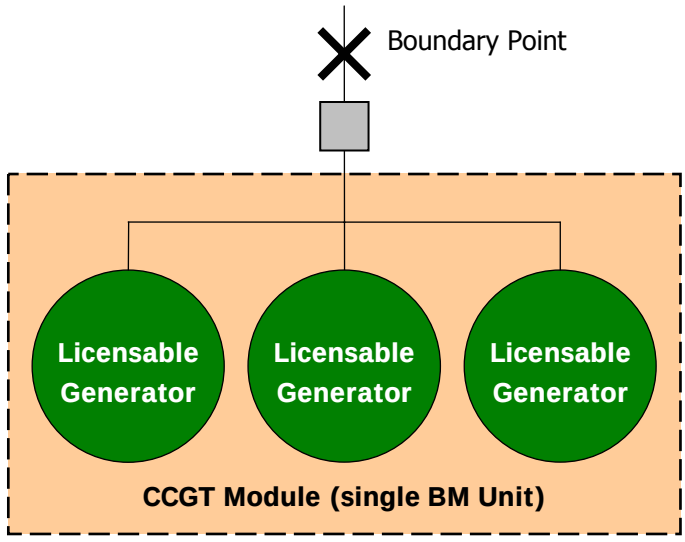
Requirements in Section K of the Balancing and Settlement Code ('the Code') mean that Import and Export flows from any Generating Unit that individually constitutes or is capable of constituting a Licensable Generating Plant are considered separate to any other flows and, as a consequence, must be metered (note that such Generating Units are referred to in this document as 'licensable Generating Units'). The only Generating Units that do not need to be individually metered are those that are not licensable by the Authority.



Metering requirements for Separate licensable Generating Units:

Exports must be measured at the Boundary point with the total system, but even if licensable Generating Units share a Boundary point they must be separately metered.

The requirement to meter licensable Generating Units currently applies equally to Generating Units that comprise a **CCGT** Module. But the Code normally deems CCGT Modules to be single BM Units (see K3.1.4), and it is normal industry practice to install Settlement Metering only at the Boundary Point with the Total System (to measure the net flow from the constituent Generating Units), and not to install separate Settlement metering at an individual Generating Unit comprising part of a CCGT Module. If no change is made to the Code, existing CCGT Modules may be non compliant with Code obligations unless additional metering is installed on their constituent Generating Units.



Industry convention for CCGT Module metering:

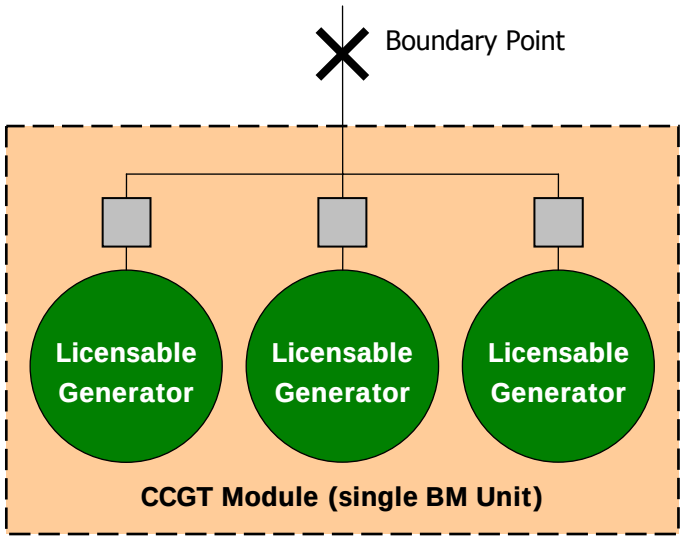
CCGT Modules are treated as a single BM Unit, and may comprise multiple Generating Units that are licensable, through not separately controllable.

The convention is to install only one Settlement meter to measure the net output of the CCGT Module

What is a CCGT?

A Combined Cycle Gas Turbine is a group of Generating Units comprising Gas Turbine Units and Steam Units and forming a CCGT Module.

Waste heat from the Gas Turbines is used by the Steam Units, and the component Units within the CCGT Module are directly connected by steam or hot gas lines so the Units can contribute to the efficiency of the combined cycle operation.



Actual Code CCGTs metering requirements:

Despite convention and treating CCGT Modules as single BM Units, the Code makes no distinction between metering Generating units in CCGT Modules and those that are separate but share a Boundary point.

Technically, all licensable Generating Units must be separately metered.

P241 contends that separately metering the Generating Units in CCGT Modules, even where such Generating Units are licensable, has no benefit for Settlement and therefore should not be required under the Code. **P241 therefore proposes that the Code should be amended to clearly state that licensable Generating Units in CCGT Modules are not required to be separately metered.** This solution was recommended by the Issue 37 Group following their consideration of this issue.

Background and related changes

Issue 37

P241 was raised following a recommendation in the Issue 37 Report. At the Panel's request the Issue 37 Group considered three issues, one of which concerned CCGT Modules and was the basis for P241. The other issues tackled by Issue 37 are not directly related to P241. The CCGT issue considered by the Issue 37 Group was identified due to discussions by the Imbalance Settlement Group (ISG).

The Code allows separate generators in a CCGT Module to be considered as a single BM Unit, but the ISG discussion suggested that the Code required Exports and Imports from each individual licensable Generating Unit within the BM Unit to be metered separately. ELEXON agreed with this interpretation of the Code. Note it is not possible to obtain a Metering Dispensation to avoid this requirement because Metering Dispensations may only be granted against a Metering Code of Practice, not the Code itself. The Issue 37 Group:

- Considered that the requirement for licensable Generating Units in a CCGT Module to be separately metered was an unintended side-effect of the Code provisions; and
- Concluded Section K of the Code should be amended to exclude Generating Units in CCGT Modules from the requirement to separately meter licensable Generating Units.

Issue 37 identified K1.1.4(e) as the Code provision that must be amended to resolve the CCGT metering issue. K1.1.4(e) was introduced in its present form by Modification P162 (see below). In interpreting the obligations around metering licensable Generating Units, the Issue 37 Group considered the intent of P162 and the accepted industry conventions.

Approved Modification Proposal P162

Modification Proposal P162 'Changes to the definition of Imports and Exports' was approved and implemented in October 2004. The aim of P162 was to clarify the definition of Imports and Exports in Section K of the Code to ensure consistency with the intent of the original BSC drafting and to ensure Section K was consistent with current operational

What is a Boundary Point?

A point at which any Plant or Apparatus (e.g. a generator) is connected to the Total System.

The Total System is the Transmission System and each Distribution System.

What is an Exemptable Generating Plant?

A plant that, if considered in isolation, would not need to be licensed.

Exemption from the requirement to hold a Generation Licence applies in relation to plant below 50MW capacity and could be granted in relation to plant up to 100MW capacity, depending on the particular circumstances.

Plant that is not exemptable is licensable.

practice and the Metering Codes of Practice. Section K sets out Parties' responsibility for Imports and Exports, and P162 suggested Section K was too ambiguous.

The P162 Group agreed the underlying Code principles of Imports and Exports were to require metering of Imports and Exports at a **Boundary Point** and for each flow to be attributable to a Party. P162 concluded it was not necessary to determine Imports/Exports for all Generating Units whatever their size, as Section K implied at that time. The P162 Group agreed that:

- Flows from large Generating Units (i.e. Licensable Generating Plants) must be measured separately; and
- Flows from **Exemptable Generating Plant** Generating Units **do not** need to be individually metered.

P162 amended Section K to reflect this; the key features of P162's interpretation of K are that it:

- Permits netting of all flows attributable to a single Party below the Boundary Point;
- K1.1.4 concerns Imports and Exports at a Boundary Point and should not require demand met by Exemptable Generating Plant below a Boundary Point to be metered;
- Reflects conventional metering practices and is compliant with the CoPs;
- Prohibits netting Boundary Point flows, but allows netting of flows below a Boundary Point attributable to one Party and not relating to a licensable Generating Unit; and
- Requires that the flow associated with a Generating Unit that individually constitutes, or is capable of constituting, a Licensable Generating Plant is separately identified.

The Section K drafting introduced by P162 does not mention Generating Units within CCGT Modules. P162 'logically tested' the interpretation and solution against a number of worked examples. Example 'e' in the P162 Assessment Report illustrates the situation of multiple licensable Generating Units attributable to single Party, and appears to best represent the situation of multiple licensable Generating Units within a CCGT Module (which constitutes a single BM Unit). P162 did not identify any examples of this configuration, but concluded that though this arrangement was not prohibited the individual flows would need to be separately identified, i.e. multiple licensable Generating Units attributable to a single Party at a Boundary Point should be seen as a **single Export per Generating Unit.**

In summary, P162 amended the Code to remove an unnecessary and inappropriate obligation on Exemptable Generating Plant, but did not specifically consider CCGT Modules. P241 now seeks to remove an unduly onerous Code requirement for licensable Generating Units within CCGT Modules to be separately metered, and thereby preserve the industry status quo that such Generating Units are not separately metered.

Further details on the background of P241 can be found in the P241 Initial Written Assessment (IWA).

3 Solution

Addressing the identified defect

It is not currently industry practice to separately meter licensable Generating Units within CCGT Modules. The Group agreed that the Code does technically require such Generating Units to be separately metered, but that such metering was not necessary for Settlement, and that it is not industry practice to separately meter them.

The Group therefore agreed that the Code should be amended to exclude Generating BM Units that comprise CCGT Modules from the Section K obligation to separately meter licensable Generating Units. This change would sanction the composition of existing CCGT installations which do not have separate meters on each licensable Generating Unit.

Such existing CCGT installations would then become compliant with the Code without needing to make any metering changes. Since this aligns the Code with industry practice there should be no impact on Parties.

Such exclusion of CCGT Modules would appear to align the licensable Generating Unit metering requirements with treating CCGT Modules as single BM Units (under K3.1.4(a)) without regard to the status of the Generating Unit(s) which comprise them.

Note that, conversely, if the existing licensable Generating Unit metering obligation with respect to CCGT Modules was retained and rigorously enforced, additional metering would need to be installed at significant expense and for no Settlement benefit.

The initial draft legal text to effect the amendment of the Code is attached to this document (Attachment A). An explanation of the draft legal text is provided below.

Potential ambiguities

When P241 was raised the Proposer queried whether the Code unambiguously requires the separate metering of licensable Generating Units (i.e. further to denoting their Import/Export flows as separate to any other plant or apparatus). The Group considered this and could not identify any ambiguity, and therefore concluded it is not necessary to make any change to clarify the obligations in Section K.

The Group discussed whether the P241 solution should try to account for the possible development other types of generating plant (e.g. using new technology) that could warrant exclusion from the separate metering requirement. The Group considered whether it was possible to identify new types of generator and take them into account in the P241 solution, e.g. **Integrated Gasification Combined Cycle** (IGCC) plant.

The Group concluded that they did not have sufficient information about how new types of generator would operate to make this determination, and noted that if new types of generator emerge Section K may be more widely impacted. The appropriateness of applying the separate metering requirement should therefore be considered with the other impacts on Section K. The Group agreed that no action should be taken under P241 to provide for future developments in generator technology.

What is an IGCC plant?

An Integrated Gasification Combined Cycle plant is a type of CCGT that uses synthetic gas created from coal with impurities removed.

Other types of licensable Generating Unit

The P241 Group considered whether any other types of licensable Generating Unit should be excluded from the requirement that they be separately metered. The Group noted that besides CCGT Modules, only Power Park Modules (PPMs) are 'deemed' BM Units under K3.1.4(a), and therefore considered whether PPMs should also be excluded from the separate metering requirement.

The Group agreed that there was no need to exclude PPM BM Units since the Generating Units constituting PPMs (i.e. individual wind turbines) are not licensable, and are therefore already not subject to the separate metering requirement. This was the intention when P162 introduced the current wording of K1.1.4. Note that this would also be the case for Offshore Power Park Module BM Units which another Modification currently under Assessment is proposing to introduce (further details available via the P237/238 webpage).

Explanation of P241 Legal Text

Only a minor Code change is required to effect the Group's agreed P241 solution. This is the insertion of additional wording in K1.1.4(e) to ensure CCGT Modules are not captured by the provision. To clarify how this change achieves the P241 solution, an explanation of the operation and interaction of paragraphs K1.1.4(c), (d) and (e) is given below.

Paragraphs K1.1.4(c), (d) and (e) (including the proposed P241 amendment) state:

1.1.4 For the purposes of the Code:

(c) any Export or Import is to be determined at a single Boundary Point;

(d) for the purposes of paragraph (c), in relation to a Party any flow (under paragraph b(i) and (ii) respectively) which occurs at a Boundary Point:

(i) to or from Plant or Apparatus of that Party shall be considered to be a single Export or Import of that Party;

(ii) to or from the Plant or Apparatus of that Party shall be considered to be a separate Export or Import from any Export or Import of any other Party.

(e) notwithstanding paragraphs (c) and (d):

(i) the flow to or from each Generating Unit (where such Generating Unit individually constitutes or is capable of constituting a Licensable Generating Plant **and is not comprised in a CCGT Module**) and to or from the associated unit transformer of that Generating Unit (if any) shall be combined. Such combined flow shall be considered to be a single Export or Import and separate from any Export or Import of any other Plant or Apparatus; and

(ii) the flow to or from a station transformer associated with a Licensable Generating Plant shall be considered to be a single Export or Import, and separate from any Export or Import of any other Plant or Apparatus.

Excluding Generating Units in CCGT Modules from K1.1.4(e)(i) excludes such Generating Units from the whole of (e). Therefore the treatment of the Exports and Imports of CCGT Modules would be the same as that, under paragraphs (c) and (d), of all Generating Plant that do not constitute a Licensable Generating Plant, because CCGTs are no longer excluded from these two paragraphs through being captured by paragraph (e).

Because paragraph (c) prescribes that all Exports and Imports will be determined at a single Boundary Point the net Export/Import of CCGT Modules will be determined at the Boundary Point. Paragraph (d) allows for the aggregation of flows from Plant and Apparatus below the Boundary Point. Note that P162 amended paragraph 1.1.4(d) to allow for the aggregation of separate flows relating to the same Party below the Boundary Point.

The netting of 'Plant or Apparatus' includes unit transformers, so flows from any unit transformers associated with CCGT Module Generating Units can be aggregated with the Generating Units comprised in the CCGT Module below the Boundary Point. This means the flows of unit transformers can still be netted with the flows of Generating Units despite CCGTs being excluded from K1.1.4(e).

4 Impacts & Costs

Costs

ELEXON Cost		ELEXON Service Provider cost	**Total Cost**
Man days	Cost		
2	£440	None	**£440**

Indicative industry costs
None identified for implementation of P241

Impacts

Impact on BSC Systems and process
None identified

Impact on BSC Agent/service provider contractual arrangements	
BSC Agent/service provider contract	Potential impact
Central Data Collection Agent	Metered data collection activities may be impacted if P241 is **not** implemented

Impact on BSC Parties and Party Agents
If P241 **not** implemented - **Generators** that operate: • CCGT Modules; and • Possibly non-standard configurations of licensable Generating Units

Impact on Transmission Company
None identified (no impact on SO operational data)

Impact on ELEXON
Support to the BM Unit registration processes (if P241 not implemented)
Support to ISG consideration of applications for non-standard BM Unit configurations (if P241 not implemented)

Impact on Code	
Code section	Potential impact
Section K	Amendment to exclude CCGTs from the requirement to separately meter licensable Generating Units

Impact on Code Subsidiary Documents
Possible impact on Metering Codes of Practice (if P241 not implemented)
Possible impact on BSCP75, which covers aggregation rules, including those for CCGTs (if P241 not implemented)

No impact identified on Core Industry Documents or any other documents or on any other Configurable Items.

5 Implementation

The Group's preliminary view is that the Implementation Date of P241 should be **5 Working Days** after Approval is received from the Authority.

Implementation of P241 would be a Code-only change that would preserve the current status quo with respect to the metering of licensable Generating Units, in particular those within CCGT Modules. The only implementation activity is therefore the amendment of the relevant Code provisions.

6 The Case for Change

Proposer's view

The Proposer contended that it is inefficient for Generators to be required by the Code to install and maintain meters not required for Settlement purposes, and for Generators and the Central Data Collection Agent (CDCA) to be required to read metering not required for Settlement purposes.

The Proposer argued that by removing this inefficiency P241 would better facilitate Applicable BSC Objectives (c) and (d).

Group's initial view of P241 benefits

Group discussions

The Group considered that the Code requires licensable Generating Units to be separately metered to ensure that the System Operator (SO) has the information required to operate the Transmission System. The exclusion of CCGTs from this requirement is appropriate because the component apparatus of CCGTs are intrinsically linked and not independent.

The Group noted that installation of Settlement metering on each licensable Generating Unit is not necessary for the SO to actually balancing the power on the System. With regard to CCGTs, the SO will direct CCGT BM Units to take balancing actions based on the combined capacity of their constituent Generating Units. The metering at the Boundary Point will record the actual energy volumes associated with the CCGT. The Group unanimously agreed that CCGT Generating Units should not be included in the requirement to be separately metered.

The Group considered that an unusual CCGT Module configuration, which would be potentially viable and might impact metering requirements, was the placement of CCGT apparatus components on different sides of a sub-station. However the Group could not identify an example of such a configuration, and did not believe this was an issue for the P241 solution.

The Group noted that as well as 'deemed' BM Units (i.e. CCGT Modules and PPMs) the BSC allows Parties to apply to register non-standard BM Unit configurations. The Group considered whether P241 should also seek to introduce the ability for the Panel (or Panel committee) to exclude Generating Units within non-standard BM Unit configurations from the requirement to be separate metered (i.e. on a case-by-case basis according to the BM Unit configuration).

The Group did not identify any existing or possible examples of non-standard BM Unit configurations that would warrant such exclusion, but determined that a question on this should be included in the P241 Assessment Consultation. The Group invites views from consultation respondents regarding whether a broad ability to exclude non-standard BM Unit configurations should be included as part of the P241 solution.

Consultation Question: Scope of exclusion from metering requirement
Do you agree with the P241 Group that P241 should specifically exclude CCGTs, or do you think a broader ability to exclude non-standard BM Units should also be introduced? If you believe there should be broader exclusion from the separate metering requirement, please provide examples of generating Unit types and/or non-standard BM Unit configurations suitable for exclusion.
The Group invites you to respond using the attached form.

Quantification of benefits

The Group considered the quantifiable benefits of P241, and agreed the primary benefit was the avoidance of incurring costs associated with installing meters on Generating Units within CCGTs. The potential benefits for existing and new CCGTs differ as follows:

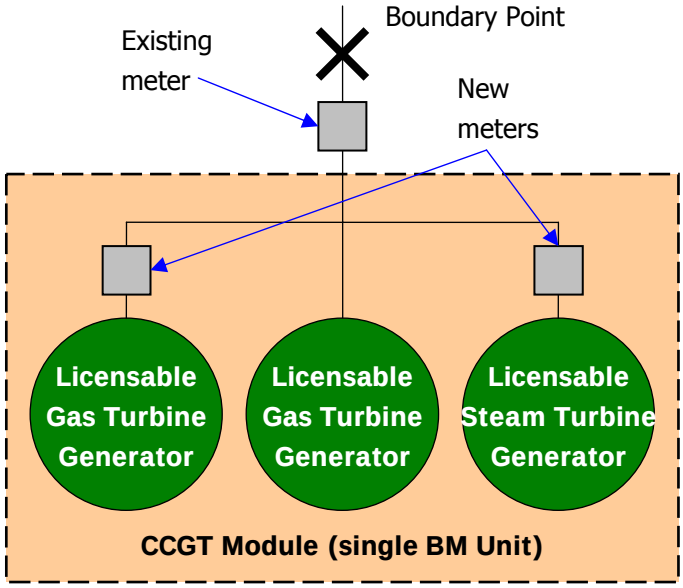
- Existing plant - Retrofitting meters to the licensable Generating Units of existing CCGTs would incur a large cost; and
- New plant - Installing meters to the licensable Generating Units of new CCGTs would incur a significant cost, though it would be less than the cost of retrofitting.

The Group considered quantification of the costs of retrofitting/installing meters. The Group noted that metering costs had been considered recently in connection with a separate Modification Proposal, P238. However, these costs are not applicable to P241 because they relate to 33kV meters, while P241 concerns 400/275kV metering.

Using estimates provided by Group members, the Group produced an indicative assessment of the typical costs of installing CoP1 standard metering on a CCGT Module Generating Unit. The assessment is shown in the table below. The benefit of P241 is the avoidance of these costs.

Indicative cost estimates for CCGT meter installation activities/equipment	
Activity/equipment	Estimated cost/impact
Meter installation option: Install new 400kV CTs and VTs at transformer (avoiding impact on existing functionality) **or**	N/A (unlikely to be space)
Meter installation option: Upgrade existing CTs and VTs to CoP1 standard **or**	Potentially viable; 400kV CT and VT costs are likely to be in the region of **£10 - 20k per CT or VT**
Meter installation option: Install stand-alone CTs and VTs in the banking compound (if there is space)	May not be space and very high civil cost; likely to be well over **£100k per generator**
Installation of additional meters and outstation channels	assuming new metering panels; around **£25k per generator** (including installation and commissioning)
Meter registration	**Several £100** (each instance)
Aggregation rule change	**Several £100** (each instance)
Cabling works	**£5k per module** (total)
Length of outage per generator/module	Substantial length of time; at least **6 - 8 weeks** (significantly more if civil works are required)
Additional meter maintenance	**Several £100** (per year)

In order to determine an indicative typical cost for retrofitting a CCGT with Settlement metering, the Group considered a typical CCGT configuration. CCGTs comprise at least one gas turbine and one steam generator; the Group believed a typical CCGT configuration was two gas turbines and one steam turbine on the same site. If all three of these Generating Units are large enough to be Licensable they would each need require a CoP1 Settlement Meter according to the Code. A CoP1 Metering system comprises both a Main and Check Meter. Each of these has three Current Transformers (CTs) and three Voltage Transformers (VTs) due to the three phase system used for electricity transmission.



Each 'meter' is a Settlement Metering System.

Each Metering System comprises:

- A Main meter - meter channels, 3 CTs and 3 VTs; and
- A Check meter - meter channels, 3 CTs and 3 VTs.

Typical cost of installation, without consideration of annual maintenance, and neglecting smaller costs such as those associated with meter registration and aggregation rules, is therefore approximately **£415,000**. This estimate is based on the metering required for:

- An existing CCGT Module comprising three licensable Generating Units (i.e. each requiring a Metering System);
- Where one Unit can be metered via the existing Metering System for the whole site (this may require a dispensation); and
- With each Metering System comprising a main and check meter, each requiring three CTs and three VTs (cost of CT/VT assumed to be £15,000).

The estimate includes 25k installation cost per generating unit, but the Group has not attempted to quantify the typical cost of civil works (i.e. construction) that may result from installing meters on existing CCGTs, as the work required would vary from site to site. However, such work would often be required due to the arrangement of the CCGT, and could have a very significant cost (i.e. more than the cost of meters/CTs/VTs for the site).

The Group has also not attempted to quantify the cost of the outage of a Generating Unit or entire CCGT Module. This cost will vary according to the length of outage and market conditions (e.g. demand for the CCGT's output, energy/fuel prices) but an outage of 6-8 weeks (suggested by the Group's estimate) would result in a material lost of revenue.

The Group noted that ELEXON previously conducted a preliminary investigation into the number of CCGTs[1] that would be impacted by retention of the separate Metering requirement. ELEXON's indicative findings were that of around 40 registered CCGTs, approximately half were likely to be impacted, i.e. if P241 is not implemented the impacted sites may need to install one or more new meters to become compliant with the Code.

Consultation Question: Quantification of benefits
The Group has quantified the impact of installing metering on CCGT Generating Units. Can you provide any further information on the cost of installing meters on new or existing CCGTs? (i.e. if P241 is not approved and additional Metering is required) For example, further details of the identified costs, or details of any required activities/equipment not identified so far.
The Group invites you to respond using the attached form.

[1] A number of CCGT installations consist of multiple CCGT Module BM Units which might each be affected.

Initial views against the Applicable BSC Objectives

The Group unanimously agreed that the benefits of P241 fall under Applicable BSC Objectives (c) and (d), for the reasons set out in the table below. The Group believes that the main benefit of P241 is under Objective (c).

P241 Group's initial assessment of P241 benefits 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.	None identified.
c) Promoting effective competition in the generation and supply of electricity and in the sale and purchase of electricity.	Removing the requirement to install and maintain meters on licensable Generating Units within CCGT Modules (i.e. where meters are not needed for Settlement purposes) would remove an obstacle to market participation.
d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.	The Code should require only the metering required for Settlement purposes. Separate metering of CCGTs is not needed for Settlement purposes; if it is not required by the Code then efficiency is promoted because Generators and the CDCA are not required to read the meters and process/administer the metered data (i.e. for no Settlement benefit). Removing the Code ambiguity (i.e. the discrepancy between the Code requirement and industry practice) promotes efficiency by reducing: • The potential for confusion by Parties when implementing requirements; and • The potential scope for Parties to dispute requirements and initiate litigation.

The Group's views differ slightly from the Proposer's views as stated in the P241 Modification Proposal and the IWA because the Group agreed that the benefit of Generators not being required to install/maintain metering should fall under Objective (c), and (c) only).

The P241 Assessment Consultation invites any views from respondents on the benefits of P241 against the Applicable BSC Objectives.

7 Attachments and further information

Attachment **A**: Legal Text Proposed

Attachment **B**: Assessment Consultation response form

Glossary	
Term	**Definition**
BM Unit	Balancing Mechanism Unit
Boundary Point	Point at which any Plant or Apparatus is connected to the Total System
CCGT	Combined Cycle Gas Turbine
CDCA	Central Data Collection Agent
CoP	Metering Code of Practice
CT	Current Transformer
Exemptable	Generating Plant is 'Exemptable' if the person generating electricity at that Plant would be exempt from the requirement to hold a Generation Licence (i.e. if they did not generate electricity at any other Plant) In practice, exemption applies for plant below 50MW capacity, and could be granted for plant up to 100MW capacity (depending on circumstances)
IGCC	Integrated Gasification Combined Cycle
ISG	Imbalance Settlement Group
Licensable	Generating Plant which is not Exemptable is Licensable Generating Plant;
Total System	The Transmission System and each Distribution System
Generating Unit	Any Apparatus which produces electricity
Generating Plant	An installation comprising one or more Generating Units, owned and/or controlled by the same person, which may reasonably be considered as being managed as one power station
CCGT Module	Multiple CCGT generating units deemed a single BM Unit
PPM	Power Park Module
SO	System Operator (i.e. National Grid for the GB Transmission System)
VT	Voltage Transformer

P241 Process Followed	
21/07/2009	P241 Modification Proposal raised
13/08/2009	Initial Written Assessment (IWA) presented to the BSC Panel
21/08/2009	First Modification Group Meeting
14/09/2009	Second Modification Group Meeting

P241 Group Membership			
Member	**Organisation**	**21/08**	**14/09**
David Jones	ELEXON (Chairman)	√	√
Dean Riddell	ELEXON (Lead Analyst)	√	√
Ed Marr	(Proposer)	√	√
Ian Pashley	National Grid	√	√
Chris Stewart	Centrica	X	√
Gary Henderson	SAIC	√	√
Esther Sutton	E.ON UK	√	√
Andy Colley	Scottish and Southern	√	√
Attendee	**Organisation**		
Diane Mailer	ELEXON (Lawyer)	√	√
Steve Francis	ELEXON (Design Authority)	√	√
Abi Akala	ELEXON (Service Delivery)	√	√
Leonie Bensted	Ofgem	-	√