

Stage 03: Transmission Company Analysis

P247: Proposer 'ownership' of Modification Proposals

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 P247 Transmission Company Analysis to modifications@elexon.co.uk by **12 noon Friday 19 February 2010**

Response Form

The P247 Modification Group requests your impact assessment of P247. 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:

We do not believe that the implementation of this proposed modification would have any impact on our ability to discharge our obligations under the Transmission Licence or on our ability to operate an efficient, economical and co-ordinated transmission System.

Question 2:

Please describe the impact(s) of the two potential alternative modifications (Alternative A and Alternative B) 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:

As above.

Question 3:

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

Please give your response:

Whilst we recognise the potential benefits the proposal brings, we are concerned that a proposer would be able to put across an unbalanced view to the panel. At present Elexon provide a balanced view to the panel and, by allowing the proposer to attend would potentially create a situation whereby an unbalanced view was heard by the panel. Specifically the proposer could introduce new arguments to the panel that would have no

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Question 3:

counterview. For this reason, we feel the proposal would not better facilitate BSC objectives a) and c).

Question 4:

Please outline your views and rationale on whether the two potential alternative modifications (Alternative A and Alternative B) would help to achieve the applicable BSC Objectives.

Please give your response:

We believe that Alternative B would better facilitate Applicable BSC Objective c) by encouraging all parties to raise proposals in that they can ensure their solution is presented to the Authority. It would also better facilitate BSC objective d) by allowing a proposer to develop and refine their proposal allowing the correction to oversights. This would remove the need for parties to raise subsequent modifications to resolve such oversights. It would also introduce a withdrawal process that would remove the risk that a modification is progressed that has no business case or has lost the support of the proposer and industry.

Alternative A would better facilitate Applicable BSC Objective c) by encouraging all parties to raise proposals in that they can ensure their solution is presented to the Authority. However, on balance would not better facilitate BSC objective d) due to the potential inefficiency created by trying to represent the conflicting views at the panel and noting that is presently done by Elexon thereby creating duplication.

Question 5:

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.

Please give your response:

No impact.

Question 6:

Please outline the impact of the two potential alternative modifications (Alternative A and Alternative B) on the computer systems and processes of the Transmission Company. Include details of any changes needed as a result of implementing the Proposed Modification.

Please give your response:

No impact.

Question 7

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

Please give your response:

No issues identified.

Question 8

Please outline any potential issues relating to security of supply arising from the two potential alternative modifications (Alternative A and Alternative B).

Question 8

Please give your response:

No issues identified.

Question 9:

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:

None.

Question 10:

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 either of the two potential alternative modifications (Alternative A and Alternative B).

Please give your response:

None.

Question 11:

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:

None.

Question 12:

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 either of the two potential alternative modifications (Alternative A and Alternative B).

Please give your response:

None.

Question 13:

Would you like to make any other comments on P247

No.



Any questions?

If you have any queries on about the consultation form, please contact Insert name here on **020 7380 XXXX** or **Insert name here @elexon.co.uk**.

[Click & Insert image](#)

Further Information

To help us process your response, please:

- Email your completed response form to **modifications@elexon.co.uk**

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- Use the following text in the subject line of your email: "P247 Transmission Company Analysis"
- Include a phone number in your covering email, so that we can contact you if we have any questions
- Respond by 12 noon on Friday 19 February 2010 (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 P247, it will draft the Assessment Report, and present it to the March Panel meeting.