

03 August 2001

**P22 ASSESSMENT PROCEDURE
CONSULTATION PAPER**

**MODIFICATION PROPOSAL 22 –
Provision of Generator Planned
Outage Information to all BSC
Signatories**

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b Distribution

Name	Organisation
Modification Group	
BSC Parties	

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II CONTENTS TABLE

1	Introduction	4
1.1	Background	4
2	Modification Group Details	5
3	The Proposal SumMarised	6
3.1	Rationale	6
4	Views Invited	7
4.1	Consultation Questions	7
4.2	Responses	8
5	Next Steps	9

1 INTRODUCTION

On the 26 July 2001 the Panel agreed that Modification Proposal P22 should be subjected to the Assessment Procedure and a further consultation exercise be undertaken with BSC Parties. This consultation paper addresses the Panel's request for additional consultation.

In order to limit the duplication of previously published material BSC Parties are invited to consider this consultation paper in conjunction with the 19 July 2001 P22 Definition Report (available on the BSC website at www.elexon.co.uk). An electronic copy of this consultation paper can also be found on the BSC website.

1.1 Background

Modification Proposal P22 was raised by Dynegy UK Limited on the 22 June 2001 and subsequently considered by the Panel on the 28 June 2001, where it was agreed that ELEXON should proceed with a Definition Report. A Definition Report was published on the 19 July 2001 and the Panel agreed that the Proposal move to the Assessment Procedure, this consultation paper forms part of that Assessment Procedure.

The purpose of the Assessment Procedure is to evaluate whether the Modification Proposal better facilitates achievement of the Applicable BSC Objectives and whether any alternative modification would, as compared with the Proposed Modification, better facilitate the achievement of the Applicable BSC Objectives in relation to the issues or defect identified in the Modification Proposal.

The Applicable BSC Objectives (as defined in the Transmission Licence) are:

- i. the efficient discharge by the Licensee of the obligations imposed upon it by the licence;
- ii. the efficient, economic and co-ordinated operation by the Licensee of the Licensee's Transmission System;
- iii. promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity; and
- iv. promoting efficiency in the implementation and administration of the balancing and settlement arrangements.

2 MODIFICATION GROUP DETAILS

This Consultation Paper has been prepared by the Reporting Modification Group. The Membership of the Modification Group who held a meeting to consider this Proposal on 11 July 2001 was as follows:

Chris Rowell	ELEXON (Chairman)
Lisa Waters	Dynegy (Proposer)
Rekha Patel	Dynegy
Martin Mate	British Energy
Terry Ballard	Innogy
Duncan Jack	St Clements Services
Nigel Brooks	NGC
Tony Doherty	Ofgem
Tim Pearson-Young	ELEXON

3 THE PROPOSAL SUMMARISED

It is proposed that two new data sets are obtained from NGC and published on the BMRS. These are:

1. Output Usable¹; and
2. Generator Planned Outage Data.

It is proposed that this data be sourced from NGC and published in the same timescales as currently defined in the Grid Code.

3.1 Rationale

The Proposer's rationale for the publication of the two data sets, summarised above, is different in each case although both hinge upon the idea that the current arrangements, under the Grid Code, for the provision and publication of this data result in an asymmetry of market information. It is argued that this asymmetry results in the potential for a commercial advantage to arise for the companies who have access to this information, when trading in forward markets.

A short summary of the different arguments for the publication of Output Usable and Outage information is presented below.

3.1.1 Output Useable

It is argued that because Output Usable data, on a zonal basis, is available to generators and not to non-generator BSC Parties that an asymmetry in the provision of market information between these two types of company (generators, non-generators) exists which may give rise to a distortion in forward markets.

3.1.2 Outage Data

It is also argued that, as only NGC has access to generator Outage information, an asymmetry exists between NGC and all other BSC signatories that may give rise to a distortion in forward markets.

3.1.3 Further information

Further information regarding the proposal and issues raised by the proposal can be found in the 19 July 2001 P22 Definition Report available on the BSC website (www.elexon.co.uk). The Definition Report also includes a description of NGC current practise regarding the collection and dissemination of generator Outage plans and Output Usable data. Examples of the type and format of data can also be found in an annex to the report.

¹ 'Output Useable' although a defined term in the Grid Code is more commonly referred to as generator 'availability'.

4 VIEWS INVITED

This section of the consultation paper sets out a number of questions that are intended to focus on the issues considered to be key to this modification proposal. It is at the discretion of BSC Parties as to whether they wish to answer all, or only some, of the questions identified in this document.

Please be aware that it is not simply the number of responses supporting a particular view that is of importance but the quality of supporting arguments. Respondents are therefore encouraged, where possible, to explain the rationale behind their thinking.

4.1 Consultation Questions

- a) Do you think that removing the asymmetry of access to generator Outage information between NGC and all other BSC Parties (for 3 time periods 2 - 52 weeks ahead, 1 – 2 years ahead and 3 – 5 years ahead) would better facilitate the achievement of one or more Applicable BSC Objective?
- b) Do you think that removing the asymmetry of access to generator Output Useable data between generators and other BSC Parties (for the 5 time periods, 2 – 49 days ahead, 2 - 52 weeks ahead, 1 – 2 years ahead and 3 – 5 years ahead) would better facilitate the achievement of one or more Applicable BSC Objective?
- c) Do you think it preferable to ask generators to duplicate the provision of Outage plans and Output Usable data to ELEXON / BSC Agent or that this information is more efficiently obtained from NGC? If so which one(s) and how?
- d) Do you consider that there are material issues associated with the governance of collection and publication of generator Outage plans and or generator Output Usable data that are not readily addressed by appropriate BSC drafting?
- e) Do you consider it preferable to publish Output Useable data by:
 - i. NGC Zone without publishing the definition of NGC zones (bearing in mind that the definition of NGC Zones are not currently published),
 - ii. NGC zone and publish the definition of NGC Zones,
 - iii. the 5 BMRS Zones,
 - iv. one zone at the national level, or
 - v. not aggregating, i.e. by Genset?
- f) In the event of (e)v. Do you think there are material consistency issues raised by the publication of Genset derived data (i.e. non BM Unit derived) under provisions in the BSC?
- g) Do you think that extending the publication of generator Outage plans would have an adverse impact on the quality of the information provided to NGC?
- h) Do you think that extending the publication of generator Output Useable data would have an adverse impact on the quality of the information provided to NGC?

- i) If Outage and or Output Usable data were to be provided to all BSC parties, would there be a material difference between publishing this data on the BMRA service or the ELEXON website?
- j) Do you believe that a distinction between types of generators, (e.g. baseload, peaking) should be made when publishing generator outage plans?
- k) Do you think that an alternative to modification proposal P22 would better facilitate the Applicable BSC Objectives?

Such an alternative may take the form of the central calculation and publication of one or more new data sets, such as Daily Margin or Daily Availability (calculated via interpolation of generator Output Usable and generator Outage plans and, in the case of a margin, a demand forecast). The time periods for such new data sets could be:

- i. 2 – 49 days ahead, produced daily,
 - ii. 15 - 365 days ahead (2 - 52 weeks), produced weekly,
 - iii. 366 – 730 days ahead (1 – 2 years), produced weekly, and
 - iv. 731 – 1825 days ahead (3 – 5 years), produced weekly.
- I) Are there any other matters that you consider relevant to Modification Proposal P22 that have not, so far, been addressed?

4.2 Responses

BSC Parties are invited to provide responses on the above questions, or other associated matters, to ELEXON by **close of business on 10 August 2001** (modifications@elexon.co.uk).

Please entitle your email 'P22 Assessment Consultation Response'

If you are responding on behalf of more than one company, please list all the companies in your response.

5 NEXT STEPS

Following consideration of responses to this consultation paper the Modifications Group will formulate what is believed to be the most appropriate form of the Modification Proposal, or Alternative. A detailed specification of the proposal will then be developed and submitted for impact assessment.

The full Assessment Report is currently scheduled to be published in time for the 20 September Panel meeting.