Stage 04: Draft Modification Report

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

P238: Removal of the requirement to Meter each Boundary Point for Offshore Power Park Modules

The BSC requires Party's Exports and/or Imports to be determined at each Boundary Point to the Transmission System or a Distribution System, via metering.

P238 proposes to treat all Exports from (or Imports to) a Balancing Mechanism Unit comprising Offshore Power Park Modules as a single Export (or Import).

P238 will allow metering to be installed to determine the Export (or Import), provided that appropriate compensation is applied to meter readings to account for losses between the location of the metering and the commercial boundary.

P238 progresses one of the recommendations of the Issue 37 Group.

Initially, the Panel recommends **Approval of P238**

High Impact:
Offshore intermittent Generators

Low Impact:
The Transmission Company and ELEXON

Panel paper number

P238
Draft Modification Report

10 September 2009

Version 0.3

Contents

About this document:

This document is a Draft Modification Report, which ELEXON is issuing for a Report Phase Consultation.

Attachment A provides additional supporting details of the Modification Group's assessment of P238. ELEXON has updated this attachment for the Draft Modification Report, to give further clarity on how connections for Offshore Power Park Modules are treated compared with those for 'standard' Onshore Power Park Modules

The consultation seeks your views on:

- The Panel's initial recommendation as to whether the change should be made;
- The Panel's recommended implementation approach; and
- The Panel's proposed redlined changes to the BSC (Attachment B) and to the Codes of Practice (Attachment C).

This is the final opportunity to comment on P238 before it is submitted to the Authority. The Panel invites you to respond to the questions in the attached response form (Attachment D).

The Panel will consider your response at its meeting on 8 October 2009, when it will agree its final recommendations. ELEXON will then submit a Final Modification Report to the Authority.

You can download further P238 documents here, including the Transmission Company's impact assessment and copies of the full industry responses to the Group's previous Assessment Consultation.

Any questions?

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1 Summary

Why Change?

The Balancing and Settlement Code (BSC) currently requires metering to be installed to determine the flows of electricity (Exports and Imports) at each Boundary Point[1] to the Total System (the Transmission System and each Distribution System).

The new Offshore Transmission regime has introduced different technical requirements for Offshore **Power Park Modules** (PPM) compared with those onshore. The Grid Code now requires that the 'strings' of Generating Units which make up Offshore PPMs must be connected to the same busbar[2], or to a collection of directly electrically connected busbars of the same nominal voltage. Onshore PPMs are not subject to this requirement. As a result, offshore intermittent Generators will be required to have more Metering Equipment than their onshore counterparts since it is likely that these points of connection to the busbar(s) will become the new Boundary Points for the Offshore PPM(s). This level of granularity of exported/imported energy is not required for Settlement.

Since a PPM is considered under the BSC to meet the criteria to form a standard Balancing Mechanism (BM) Unit[3] configuration, metered data (energy volumes) from Offshore PPMs with multiple Boundary Points will need to be aggregated up to a BM Unit level.

The increase in the amount of Metering Equipment that will be needed will introduce disadvantages to offshore intermittent Generators compared to onshore intermittent Generators, and the increased administrative and data collection requirements, will create inefficiencies in the implementation of the Balancing and Settlement arrangements.

Metering requirements for Onshore: P162 'Changes to the definition of Imports and Exports' clarified an ambiguity in Section K of the BSC that existed at the time in order to ensure that excessive metering was not installed to separately determine the flows at Boundary Points from individual Generating Units that did not constitute Licensable Generating Plant (e.g. the individual Generating Units within an onshore wind farm). This change which was implemented in October 2004 and gave clarity and certainty to onshore intermittent Generators that Settlement was concerned with the aggregate flows of electricity from multiple Generating Units (that do not constitute Licensable Generating Plant) at Boundary Points to the onshore Transmission System. You can find more information about P162 here.

Solution

P238 will help to remove these inefficiencies by allowing all the Exports from (or Imports to) a BM Unit comprising Offshore PPMs to be treated as a single Export (or Import) and thereby avoid the need for separate metering of every Boundary Point of Offshore PPMs.

The overriding consideration would be that the installed metering was able to measure and record the energy Exported (or Imported) by each BM Unit. P238 proposes that there should be nothing within the solution to prevent Generators from metering each Boundary Point and aggregating the metered data to a BM Unit level if they prefer (particularly as some Generators may have already designed their offshore platform on that basis).

What is a Power Park Module?

This is the Grid Code term for a collection of Generating Units which are powered by an intermittent power source (e.g. by wind, wave or solar power).

Section 1 of Attachment A explains the Grid Code's requirements and definitions in more detail.

[1] A Boundary Point means a point at which any Plant or Apparatus not forming part of the Total System is connected to the Total System.

[2] A busbar is a system of conductors in which the power from the Generating Units is collected for transmission.

[3] BM Units are the 'units of trade' in the Balancing Mechanism. Each BM Unit is a collection of Plant and/or Apparatus (e.g. Generating Units such as wind turbines). You can download an information sheet from ELEXON's website which explains BM Units in more detail.

This change will be formalised in Section K of the BSC, in line with the Issue 37 Group's recommended solution.

Attachment B contains the Group's recommended changes to the BSC (the 'legal text').

The solution proposed also envisages that this would require amendments to the Codes of Practice to introduce additional flexibility for the location of the Actual Metering Points for offshore platforms and remove the need for Metering Dispensations in such cases.

This change will be formalised in the Codes of Practice, in line with the Issue 37 Group's recommended solution.

Attachment C contains the Group's recommended changes to the Codes of Practice.

The issue identified by P238 is caused by the different technical requirements for offshore Generators, and does not arise onshore. The Modification Group and the Panel believes that it is appropriate for the solution to only apply offshore. This view is supported by the Transmission Company and by all respondents to the Group's consultation. You can find further information in Sections 1, 2 and 3 of Attachment A.

Related Changes

P238 progresses one of the recommendations of the **Issue 37**[4] Group, which considered 4 issues with the BSC metering and BM Unit requirements, all of which have since been raised as Modification Proposals.

Modification Proposal P237[5] addresses another of these separate (but related) issues. The Group is consulting on P238 and P237 in parallel. You can download the P237 consultation documents here.

Modification Proposals P240[6] **and P241**[7] address the remaining two issues. The Group is still assessing these proposals, and will submit its Assessment Reports for P240 and P241 to the Panel in November 2009.

P238, P237 and P240 all relate to offshore generation. Sections 1 and 3 in Attachment A explain their interaction in more detail.

Impacts & Costs

P238 will require changes to Section K of the BSC and the Codes of Practice 1, 2, 3, 5 and 10.

The costs of implementing these changes will be **3 man days** (£660) of ELEXON effort. There are no implementation costs for the Transmission Company or any BSC Agents.

Implementation

If the Authority approves P238, the Group recommends that the changes to the BSC and Codes of Practice are implemented **5 Working Days** after the Authority's decision.

Where can I find more information on the Issue 37 Group's discussions?

Section 1 in Attachment A gives an explanation of the other 3 changes recommended by the Issue Group, and how these may interact with P238.

These 3 changes have now been raised as P237, P240 and P241.

You can also find further information on the Issue 37 page of ELEXON's website, in ISG paper 99/08, and on the P237, P240 and P241 web pages.

[4] 'Boundary Point Metering and BM Unit Issues in Section K'.
[5] 'Standard BM Unit configuration for Offshore Power Park Modules'.
[6] 'Switching Plant and Apparatus between BM Units'.
[7] 'Relaxation of Requirement to Separately Meter Licensable Generating Units'.

The Case for Change

The Group and the Panel believes that P238 will ensure that the BSC metering requirements are not an unnecessary barrier to offshore renewable generation.

The Transmission Company and all respondents to the Group's consultation support this view.

Recommendation

The Panel therefore unanimously recommends that P238 should be approved.

When was the term Power Park Module added to the BSC?

Modification Proposal P191 introduced this term to the BSC in 2005, following its inclusion in the Grid Code and to support intermittent generation.

2 Why Change?

Why has P238 been raised?

A new competitive Offshore Transmission Regime has been introduced by the Government and Ofgem which is due to 'Go-Live' in June 2010. As part of the process the Government introduced changes into the electricity codes to facilitate the new regime. The changes impact all offshore generation that is connected at 132 kilovolts (kV) and above and came into effect on 24 June 2009 ('Go-Active').

The changes introduced into the Grid Code included an amended definition of a Power Park Module, which allows one or more **Power Park Strings** (strings of intermittently powered Generating Units) of an Offshore PPM to be connected to an offshore Transmission System (i.e. have multiple Boundary Points). Onshore PPMs will still be limited to a single Boundary Point.

Since the BSC requires flows of electricity at each Boundary Point to the Transmission and Distribution Systems to be determined by metering, the change will mean that more metering (i.e. Metering Equipment[8]) will be required for Offshore PPMs with multiple points of connection to an offshore Transmission System.

The BSC also considers a PPM as a standard configuration of Plant and Apparatus which meets the criteria to form a single BM Unit and therefore the Grid Code definition change will affect the amount of aggregation of metered data required in order to calculate BM Unit level energy volumes.

The changes create inefficiencies for:

- **Offshore intermittent Generators** (who will have to install and maintain more Metering Equipment);
- **Registrants** of offshore Metering Systems (who will have to register more Metering Systems (potentially), submit more Meter Technical Detail information and more complex aggregation rules for their offshore Metering System(s)); and

[8] Metering Equipment means Meters, measurement transformers (voltage, current or combination units), metering protection equipment including alarms, circuitry, associated Communications Equipment and Outstations and wiring.

- **ELEXON** and **BSC Agents** (who will have to record the Metering Systems' details and Meter Technical Details, validate Aggregation Rules and collect and aggregate more metered data from Metering Systems' Outstations[9]).

The Proposer considers that it was not the intention of the new definition of Offshore Power Park Module to place excessive costs and increased administrative burden on offshore intermittent Generators compared with other types of Generator. The Proposer believes that, if P238 is not implemented, offshore intermittent Generators will be unduly disadvantaged by having to install and register more Metering Equipment than is necessary to determine BM Unit energy volumes or for the integrity of Settlement compared to standard onshore connections for onshore intermittent Generators. The Proposer therefore believes that the BSC provisions should be changed to remove this potential barrier to offshore development.

The Panel agrees with the Modification Group that the specific issue which P238 identifies is limited to offshore intermittent Generators, because it arises specifically from the new definition of Offshore Power Park Module. You can find the Group's reasons for this view in Sections 1 and 3 of Attachment A.

The Transmission Company and all respondents to the Group's consultation support this view.

Consultation Question: Scope of issue
Do you agree with the Panel's initial view that P238 will not unduly disadvantage onshore intermittent Generators (or unduly advantage offshore intermittent Generators)?
The Panel invites you to give your views using the response form in Attachment D.

[9] An Outstation receives and stores data from a Meter(s) for the purpose of transferring that metered data to the Central Data Collection Agent.

3 Solution

How will P238 resolve the issue?

P238 proposes to make changes to Section K of the BSC such that all Exports from (or Imports to) a BM Unit comprising Offshore PPMs can be treated as a single Export (or Import).

The effect of this change would be to remove the requirement for separate metering of every Boundary Point of Offshore PPMs.

P238 proposes to allow metering to be installed anywhere on the offshore platform provided that it was able to measure and record the energy Exported (or Imported) by each BM Unit and that the meter readings were (where necessary) adjusted to compensate for any electrical losses between the metering point (s) and the commercial boundary (Boundary Point (s)).

This flexible approach would still allow Generators to meter each Boundary Point and aggregate the metered data to a BM Unit level if they prefer (particularly as some Generators may have already designed their offshore platform on that basis).

The solution proposed envisages that this would require amendment to the Codes of Practice to introduce additional flexibility for the location of the Actual Metering Points for offshore platforms and remove the need for Metering Dispensations[10] against the relevant Code of Practice.

This will deliver cost and administrative efficiencies to offshore intermittent Generators, Registrants of offshore Metering Systems, ELEXON and BSC Agents as it will:

- Reduce the amount (and cost) of Metering Equipment (and ancillary equipment, detailed below) that needs to be installed by Generators on offshore platforms. It will also reduce the number of spare parts that need to be kept in store over the lifespan of the Metering Equipment in case of faults;
- Reduce the space required (and associated costs) on offshore platforms to accommodate Metering Equipment, switchboards and back-up metering power supplies (to enable remote reading of the Outstation(s) in the event of a power supply failure);
- Reduce the number (and cost) of Meter calibration checks required on offshore platforms (in accordance with Code of Practice 4 - required every 5, 10 or 15 years depending on the relevant Code of Practice and regime chosen (CoP1 and 2 Meters only));
- Reduce the administrative burden on Registrants for submitting Meter Technical Details and more complex Aggregation Rules to the Central Data Collection Agent (CDCA) and registering more Metering Systems (potentially) with the Central Registration Agent (CRA);
- Reduce the time taken to validate Aggregation Rules against Meter Technical Details submitted to the CDCA (ELEXON supports this process);

Has the Group developed the solution from the original Modification Proposal?

No, the Group's solution is identical to that proposed by the Issue 37 Group and by the Proposer in the original Modification Proposal.

[10] The Codes of Practice require Registrants to apply for a Metering Dispensation if Metering Equipment cannot be installed at the Defined Metering Points described in the relevant Code of Practice. These Defined Metering Points relate to Boundary Points as described in the BSC itself.

- Reduce the time taken by (and cost associated with) Meter Operator Agents carrying out Meter fault investigations on offshore platforms;
- Reduce the time taken for Technical Assurance Agent audits of offshore Metering Systems;
- Reduce the number of Metering System Outstations (potentially) that the CDCA is required to dial each day; and
- Reduce the volume of metered data collected, stored and aggregated by the CDCA.

Section 3 in Attachment A provides worked examples of these benefits for different types of metering configurations that could satisfy BM Unit requirements.

Section 4 of this document and Section 3 in Attachment A provide more details of the potential cost-savings associated with P238.

Which Codes of Practice will be impacted by P238?

The following Codes of Practice (CoPs) will need to be changed in order to deliver the P238 solution:

- **CoP1** 'Code of Practice for the Metering of Circuits with a Rated Capacity **Exceeding 100MVA** For Settlement Purposes';
- **CoP2** 'Code of Practice for the Metering of Circuits with a Rated Capacity **Not Exceeding 100MVA** For Settlement Purposes'; and
- **CoP3** 'Code of Practice for the Metering of Circuits with a Rated Capacity **Not Exceeding 10MVA** For Settlement Purposes'.

For consistency between the 'Half Hourly' Codes of Practice, there is merit in making similar changes to the following CoPs:

- **CoP5** 'Code of Practice for the Metering of Energy Transfers with a Maximum Demand of up to (and Including) 1MW For Settlement Purposes'; and
- **CoP10** 'Code of Practice for Metering of Energy via Low Voltage Circuits for Settlement Purposes'.

None of the respondents to the Group's consultation disagreed with this approach so the Group agreed to recommend changes to CoPs 1, 2, 3, 5 and 10.

Has the Group identified any other solutions?

Neither the Modification Group, nor the Transmission Company, nor the consultation respondents have identified any alternative solution which might better address the issue.

4 Impacts, Costs & Implementation Approach

What are the impacts of P238?

P238 impacts:

- **Section K** of the BSC, which contains the requirements for determining Exports and/or Imports at Boundary Points;
- **Annex X-1** of the BSC, which will need to include a new reference to the Grid Code's definition of an Offshore Power Park Module;
- **Offshore intermittent Generators**, who procure the design of offshore platforms and the installation of Settlement Metering Equipment;
- **Registrants of offshore Metering Systems**, who submit Metering System registration details to the CRA and Meter Technical Details to the CDCA;
- The **CRA**, who will need to validate and process applications to register Metering System information;
- The **CDCA**, who receives and validates Meter Technical Details and Aggregation Rules; and
- **ELEXON**, who supports these validation processes.

The Group believes that no changes are required to the Grid Code, as the definition of an Offshore Power Park Module will remain unchanged. The Transmission Company supports this view.

The Group did note that some offshore intermittent Generators may have already installed metering onshore and would not fall within the scope of P238 as it allows for flexibility in where metering is installed on the offshore platform only. The Group agreed that in these cases, if P238 was approved, the Registrants of those Metering Systems would need to seek Metering Dispensations against the CoP requirement to meter offshore, before Go-Live in June 2010.

Consultation Question: Legal text and CoP changes
Do you agree that the Panel's recommended legal text and CoP changes deliver the solution agreed by the Modification Group?
The Panel invites you to give your views using the response form in Attachment D.

What are the associated implementation costs?

The costs of implementing P238 are minimal, and are limited to 3 man days (£660) of ELEXON effort to update the BSC and CoPs with the changes which have already been drafted and update Local Work Instructions.

There will be very minor efficiency/cost savings to ELEXON if P238 is implemented in parallel with P237, as this will enable both sets of changes to Section K of the BSC to be made and published at the same time.

The Transmission Company has confirmed that it will not incur any implementation costs from P238. You can download the Transmission Company's full impact assessment here.

There is no direct impact on any BSC Agents. The CDCA and CRA have confirmed that there will be no system impacts and no changes required to documentation or processes.

Where can I find the draft changes to the BSC and to the Codes of Practice?

Attachments B and C contain the Group's recommended BSC legal text and redlined changes to the Codes of Practice.

You are invited to review and comment on the changes as part of this Report Phase Consultation.

Will P238 deliver any cost savings?

All the respondents to the Group's consultation agree that P238 would deliver efficiency/administrative benefits. One respondent believes that, whilst P238 may not affect some of their existing projects, they do have projects which have yet to be finalised which could benefit from P238 (noting that these benefits would only be really significant if implemented in conjunction with P237).

Two respondents have provided cost saving information (one confidentially). In the non-confidential response the respondent identified a potential cost saving of £1.57m in Metering Equipment and maintenance costs (based on cost estimates provided in the P238 Assessment Consultation Attachment (Attachment A) and not discounting for Net Present Value). This respondent also noted that with 33GW (Giga Watts) of potential offshore wind generation expected to be built within the next 20 years that, despite designs varying, they would still expect the industry benefit to be a significant multiple of the £1.57m figure. The respondent also noted that the figure they quoted would actually depend on how much Metering Equipment actually needed to be used for each offshore installation.

The Transmission Company did not identify any cost savings.

You can download copies of the full industry consultation responses and the Transmission Company's impact assessment here.

It is difficult to quantify the savings under P238 related to the BSC Agents (CDCA and CRA) processing fewer registrations of Meter Technical Details and Metering System details (if any) and ELEXON's savings in carrying out less validation of them - the reduction of the amount of Metering Equipment required will vary depending on the design of the circuits on the offshore platform. Equally, it is difficult to quantify the cost savings associated with the CDCA visiting sites for Meter Advance Reconciliations and for manual downloads of metering data when there are metering faults or communication link failures. The costs associated with the TAA visiting a site to carry out an audit of Metering Equipment will be increased as a result of the Offshore Transmission Regime (the costs of physically getting offshore to the platform and for safety and emergency training) and although it is likely that there will be a reduction in the time it takes to carry out an audit it is not clear how much this will be reflected in cost savings (or avoided costs).

When will P238 be implemented?

The Group and the Panel believes that the current BSC requirement for metering each Boundary Point is presenting an unnecessary barrier to the development of offshore renewable generation.

The Group notes that this may affect offshore projects which are already in development, as well as those which are initiated after the new Offshore Transmission arrangements 'go live' in June 2010.

The Panel therefore agrees with the Group that, if the Authority approves P238, the changes to the BSC and Codes of Practice should be implemented 5 Working Days after the Authority's decision. This will resolve the issue as soon as possible.

The changes to the Codes of Practice are minor and include adding flexibility to where the Actual Metering Points can be on the offshore platform and removing the requirement to apply for a Metering Dispensation. The Group has developed the Codes of Practice changes during the Assessment Procedure so that they can be delivered in parallel with those to the BSC itself and used straight away.

What is a Meter Advance Reconciliation?

A Meter Advance Reconciliation (MAR) is a method of confirming that the advance (the difference between two readings, e.g. kWh readings) of a register, on the physical Meter, is equal to the sum of the equivalent half hourly data downloaded remotely, for the same period. A MAR is particularly important to do for Meters with separate Outstations where the Outstation doesn't hold the Meter's main register reading but only the half hourly data produced by the Meter.

The Panel agrees with the Group that the Codes of Practice changes (Attachment C) should be implemented in parallel with the BSC changes (Attachment B), 5 Working Days after an Authority decision.

The Transmission Company and all respondents to the Group's Assessment Consultation support this approach and the Group's proposed Implementation Date.

Consultation Question: Implementation approach
Do you agree with the Panel's recommended Implementation Date (for both the BSC and CoP changes) of 5 Working Days after an Authority decision?
The Panel invites you to give your views using the response form in Attachment D.

What is the Group's view?

The Group believes that P238 will facilitate the current and future development of Offshore generation projects, by removing an unnecessary barrier caused by the BSC's existing metering requirements.

5 Case for Change

Why will P238 be better than the existing BSC requirements?

The Group believes that P238 will better facilitate the achievement of **Applicable BSC Objectives (c) and (d)**.

This view is supported by the Transmission Company and all consultation respondents.

The table below sets out the Group's views against each Applicable BSC Objective.

Applicable BSC Objective	Benefit(s)
Objective (a)	None identified.
Objective (b)	None identified.
Objective (c)	P238 ensures that offshore Generators do not face excessive metering requirements (the consequences of which are highlighted in section 3) compared with other Generators. Excessive metering would lead to higher maintenance costs[11] as the probability of an item failing is likely to increase with more equipment. Offshore Generators in the transitional regime who have either planned, built, or are in the process of constructing to designs that did not require or envisage the need extra metering, would be particularly disadvantaged.
Objective (d)	P238 ensures that BSC Agents will not have to accommodate excessive metering data collection requirements. The CDCA will perform less Meter Advance Reconciliations and the Technical Assurance Agent will need to audit less Metering Equipment.

What are the Applicable BSC Objectives?

(a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence

(b) The efficient, economic and co-ordinated operation of the GB Transmission System

(c) 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

(d) Promoting efficiency in the implementation of the balancing and settlement arrangements

[11] See Section 4 of this document and Section 3 in Attachment A for further details of the potential cost-savings associated with P238.

Are there additional benefits if P238 is combined with P237 and P240?

Yes, the Group and Panel identified wider benefits from P238 if it is delivered in combination with other Issue 37 changes.

The Group and Panel believe that all four Modification Proposals raised as a result of Issue 37 address separate (although related) issues, and are not dependant on each other. Each therefore delivers potential benefits in isolation of the others, and benefits from a separate assessment against the current BSC rules.

However, the Group and Panel note that 3 of the changes support each other (P238, P237 and P240) as part of a package of measures to remove barriers to offshore generation. In combination, the benefits of these changes will be greater than at the individual proposal level. The Group believes that it is helpful to highlight these wider benefits, so that the Authority can take them into account when making its decisions.

For each worked example in Attachment A of this document, the Group has therefore identified:

- The benefits of P238 on its own; and
- The benefits of P238 when combined with the other changes.

All the consultation respondents and the Transmission Company agree with the wider benefits which the Group has identified.

One respondent argues that the benefits of P238 and P237[12] in combination exceed the sum of the benefits of each modification on its own. Another respondent notes that, to be effective, P240 needs P238 and P237.

The Panel invites you to note these wider benefits, as described in Section 3 of Attachment A.

P238 and P237 will be issued to the Authority for decision in parallel, and there will be minor efficiency benefits to ELEXON if they are implemented at the same time. There will also be more certainty for offshore developers regarding the intended rules if all of the offshore changes are implemented simultaneously or as close together as possible (noting that the P240 assessment timetable is 2 months behind P238 and P237).

Consultation Question: Combined benefits of P238, P237 and P240
Do you agree with the additional combined benefits of P238, P237 and P240 which are identified in Attachment A?
The Panel invites you to give your views using the response form in Attachment D.

[12] The P237 Group did identify that there would be costs savings associated with registering fewer BM Units. You can download copies of the P237 Assessment Report here.

6 Panel's Discussions

Does the Panel agree with the Group's views?

Yes, the Panel **unanimously** agrees with the Group, the Transmission Company and Assessment Consultation respondents that:

- P238 will better facilitate the achievement of **Applicable BSC Objectives (c) and (d)** for the reasons set out in Section 5;
- An Implementation Date of **5 Working Days** is appropriate, as it will remove any barrier to current offshore development as soon as possible (the Panel notes that it is desirable for the Authority to make its decision before the Offshore Transmission Regime 'Go-Live' date in June 2010); and
- The draft legal text and CoP changes deliver the solution agreed by the Group and (subject to any industry comments received in the Report Phase consultation) are appropriate.

Consultation Question: Panel's initial view on merits of P238
Do you agree with the Panel's initial recommendation that: • P238 will better facilitate the achievement of **Applicable BSC Objectives (c) and (d)** when compared with the existing BSC requirements; and • P238 should therefore be approved?
The Panel invites you to give your views using the response form in Attachment D.

Does the Panel have any additional views or comments?

The Panel agrees that, when looking purely at the BSC rules and the Grid Code's busbar requirements for Offshore Power Park Modules, P238 appears to be a straightforward and sensible change because it will help to reduce to a minimum the amount of Metering Equipment required for Settlement.

One Panel member noted that a Working Group is currently looking into ownership issues surrounding Gas Insulated Switchgear (GIS). The Working Group will be updating the Grid Code Review Panel in the near future and this may have implications for what is understood by the term 'standard connection'. The examples in the P238 report have referred to National Grid agreeing that certain configurations of plant will be 'standard' and 'non-standard'. ELEXON noted that use of the term standard could be substituted and the Modification Report should simply set out what the BSC requirements would be for Power Park Modules if particular configurations were sited onshore as opposed to offshore.

Another Panel member expressed a desire to have further industry support for the argument that P238 does not disadvantage onshore intermittent Generators had not been made as there were only four responses during the Assessment Consultation. The Panel member believed that P238 would treat onshore and offshore intermittent Generators on a like for like basis and that it was important for respondents to confirm that the BSC did not introduce advantages for offshore intermittent Generators. The Panel member noted that ELEXON had invited the British Wind Energy Association and Renewable Energy Association to encourage its members to respond to the repeated question in the Report Phase Consultation, on whether P238 creates an undue advantage for offshore intermittent Generators over their onshore counterparts. ELEXON will also ask National Grid to notify Parties to the System Operator - Transmission Owner Code.

What is the Panel's view?

The Panel agrees with the Group that P238 will better facilitate the achievement of Applicable BSC Objectives (c) and (d).

7 Panel's Initial Recommendations

The Panel initially recommends:

- That P238 **should** be made;
- An Implementation Date of 5 Working Days after an Authority decision (such that both the BSC legal text and the changes to the CoPs will become effective on this date);
- The draft BSC legal text contained in Attachment B; and
- The draft redlined changes to the CoPs contained in Attachment C**.**

Recommendation

The Panel's initial unanimous recommendation is that P238 should be approved.

8 Further Information

You can find more information in:

Attachment A: Detailed Assessment

See this attachment for further supporting details of the Group's discussions.

These include:

- An explanation of the relevant Grid Code definitions;
- Background information on the new Offshore Transmission regime;
- Detailed worked examples of:
  - The effect of the issue on the metering requirements for an offshore intermittent Generator under the new Offshore Transmission Regime;
  - The resulting benefits of P238 for metering requirements for offshore intermittent Generators under the new Offshore Transmission Regime; and
  - The wider benefits from combining P238 with P237 and P240;
- The reasons why the Group believes that the issue is limited to Offshore intermittent generation;
- Details of the Group's membership;
- A copy of the Group's Terms of Reference; and
- A timetable showing the Group's assessment so far, as well as planned dates for its remaining activities.

Attachment B: Draft BSC Legal Text

Attachment C: Draft CoP Changes

See these attachments for copies of the Group's recommended redlined changes to the BSC and to the CoPs.

Attachment D: Consultation Questions

Please use this form to submit your consultation response. The Panel invites you to give your views on each of the questions in this form.

You can download further P238 documents here, including the Transmission Company's impact assessment and copies of the full industry responses to the Group's previous Assessment Consultation.