

REQUIREMENTS SPECIFICATION for Modification Proposal P226 ' Improving Large Combustion Plant Directive Information Disclosure '

Prepared by: P226 Modification Group

Date of Issue: 03 October 2008
Reason for Issue: Impact Assessment

Document Reference: P226AS
Version Number: 1.0

Proposed Modification P226 seeks to enhance the visibility of key Large Combustion Plant Directive (LCPD) emission limit/allocations and operating hours data by publishing such data on the Balancing Mechanism Reporting System (BMRS). In addition the proposal requires relevant BSC Parties to promptly inform the market (again via the BMRS) whenever they request changes to emission limits/allocations or subsequently have such changes granted under the relevant Emission Limit Value (ELV) or National Emission Reduction Plan (NERP).

Alternative Modification P226 is similar to the Proposed Modification, except that it focuses instead on the publication of information on the BMRS relating to cumulative operating hours and derogations applied for and granted. It does not require the submission or publication of details on emission limits/allocations. As such the Alternative Modification does not contain all of the reporting requirements detailed in the Proposed Modification.

PURPOSE OF THIS DOCUMENT

The BSC Panel considered P226 at its meeting on 11 September 2008 and submitted the proposal for a 3 month Assessment Procedure to be conducted by the P226 Modification Group (formed from members of the Settlement Standing Modification Group). The P226 Modification Group ('the Group') has met twice to date on 16 & 25 September 2008, and agreed the requirements for the Proposed Modification and Alternative Modification. This document sets out the requirements agreed by the Group, and seeks to provide detail and support for the impact assessment to be carried out by BSC Agents, BSC Parties, the Transmission Company and BSCCo.¹

Any queries regarding the impact assessment requirements should be addressed to:

Stuart Holmes (020 7380 4135); e-mail address stuart.holmes@elexon.co.uk

¹ The Balancing and Settlement Code Company (ELEXON).

CONTENTS TABLE

Summary of Impacted Parties and Documents3

1 What is P226?4

1.1 Background 4

1.2 The Issue 4

1.3 Summary of Proposed Modification Solution..... 5

1.4 Summary of Alternative Modification Solution 5

2 Scope of P2266

3 Detail of Proposed Modification Solution Requirements.....6

3.1 Reporting Requirement 1: Register of BM units.....7

3.2 Reporting Requirement 2: LCP Status7

3.3 Reporting Requirement 3: Cumulative Operational Hours 8

3.4 Reporting Requirement 4: Remaining Operational Hours 8

3.5 Reporting Requirement 5: NERP and ELV 'B Specific Limits' Traded 9

3.6 Reporting Requirement 6: Application for Derogations 9

3.7 Reporting Requirement 7: Granted Derogations 9

3.8 Reporting Requirement 8: Emission limits for Opted In LCPs..... 9

4 Detail of Alternative Modification Solution Requirements10

5 Implementation Options.....11

5.1 Option 1: Full Trading Platform 11

5.2 Option 2: Manual Reporting System..... 12

5.3 Summary..... 12

6 Estimated Impact of Modification on Systems, Processes and Documentation..13

7 Development Process14

8 Terms Used in this Document.....14

9 Document Control.....14

9.1 Authorities 14

9.2 References 14

Intellectual Property Rights, Copyright and Disclaimer

The copyright and other intellectual property rights in this document are vested in ELEXON or appear with the consent of the copyright owner. These materials are made available for you for the purposes of your participation in the electricity industry. If you have an interest in the electricity industry, you may view, download, copy, distribute, modify, transmit, publish, sell or creative derivative works (in whatever format) from this document or in other cases use for personal academic or other non-commercial purposes. All copyright and other proprietary notices contained in the document must be retained on any copy you make.

All other rights of the copyright owner not expressly dealt with above are reserved.

No representation, warranty or guarantee is made that the information in this document is accurate or complete. While care is taken in the collection and provision of this information, ELEXON Limited shall not be liable for any errors, omissions, misstatements or mistakes in any information or damages resulting from the use of this information or action take in reliance on it.

SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

As far as the Modification Group has been able to assess, the following parties/documents would be impacted by P226.

Please note that this table represents a summary of the full initial impact assessment, which is contained in Section 5.3.

Parties	Sections of the BSC	Code Subsidiary Documents
Distribution System Operators <input type="checkbox"/>	A <input type="checkbox"/>	BSC Procedures <input checked="" type="checkbox"/>
Generators <input checked="" type="checkbox"/>	B <input type="checkbox"/>	Codes of Practice <input type="checkbox"/>
Interconnectors <input type="checkbox"/>	C <input type="checkbox"/>	BSC Service Descriptions <input type="checkbox"/>
Licence Exemptable Generators <input type="checkbox"/>	D <input type="checkbox"/>	Party Service Lines <input type="checkbox"/>
Non-Physical Traders <input type="checkbox"/>	E <input type="checkbox"/>	Data Catalogues <input type="checkbox"/>
Suppliers <input type="checkbox"/>	F <input type="checkbox"/>	Communication Requirements Documents <input type="checkbox"/>
Transmission Company <input type="checkbox"/>	G <input type="checkbox"/>	Reporting Catalogue <input type="checkbox"/>
Party Agents		
Data Aggregators <input type="checkbox"/>	H <input type="checkbox"/>	Core Industry Documents
Data Collectors <input type="checkbox"/>	I <input type="checkbox"/>	Ancillary Services Agreement <input type="checkbox"/>
Meter Administrators <input type="checkbox"/>	J <input type="checkbox"/>	British Grid Systems Agreement <input type="checkbox"/>
Meter Operator Agents <input type="checkbox"/>	K <input type="checkbox"/>	Data Transfer Services Agreement <input type="checkbox"/>
ECVNA <input type="checkbox"/>	L <input type="checkbox"/>	Distribution Code <input type="checkbox"/>
MVRNA <input type="checkbox"/>	M <input type="checkbox"/>	Distribution Connection and Use of System Agreement <input type="checkbox"/>
BSC Agents		
SAA <input type="checkbox"/>	N <input type="checkbox"/>	Grid Code <input type="checkbox"/>
FAA <input type="checkbox"/>	O <input type="checkbox"/>	Master Registration Agreement <input type="checkbox"/>
BMRA <input checked="" type="checkbox"/>	P <input type="checkbox"/>	Supplemental Agreements <input type="checkbox"/>
ECVAA <input type="checkbox"/>	Q <input checked="" type="checkbox"/>	Use of Interconnector Agreement <input type="checkbox"/>
CDCA <input type="checkbox"/>	R <input type="checkbox"/>	BSCCo
TAA <input type="checkbox"/>	S <input type="checkbox"/>	Internal Working Procedures <input type="checkbox"/>
CRA <input type="checkbox"/>	T <input type="checkbox"/>	BSC Panel/Panel Committees
SVAA <input type="checkbox"/>	U <input type="checkbox"/>	Working Practices <input type="checkbox"/>
Teleswitch Agent <input type="checkbox"/>	V <input checked="" type="checkbox"/>	Other
BSC Auditor <input type="checkbox"/>	W <input type="checkbox"/>	Market Index Data Provider <input type="checkbox"/>
Profile Administrator <input type="checkbox"/>	X <input checked="" type="checkbox"/>	Market Index Definition Statement <input type="checkbox"/>
Certification Agent <input type="checkbox"/>		System Operator-Transmission Owner Code <input type="checkbox"/>
Other Agents		
Supplier Meter Registration Agent <input type="checkbox"/>		Transmission Licence <input type="checkbox"/>
Unmetered Supplies Operator <input type="checkbox"/>		
Data Transfer Service Provider <input type="checkbox"/>		

1 WHAT IS P226?

1.1 Background

The Large Combustion Plant Directive (LCPD) aims to reduce acidification, ground level ozone and particulates by controlling the emissions of sulphur dioxide (SO₂), oxides of nitrogen ('NOx') and dust from large combustion plants (LCPs).

The LCPD stipulates that:

1. New combustion plants must meet emission limit values (ELVs) given in the LCPD; and
2. Existing plants (those in operation pre-1987), can choose to meet the LCPD obligations by either:
 - Complying with ELVs for NOx, SO₂, and particles; or
 - Operating within a 'National Plan'. That would set an annual national level of emissions calculated by applying the ELV approach to existing plants, on the basis of those plants' average actual operating hours, fuel used and thermal input. The National Emissions Reduction Plan (NERP) is the national plan for the UK.

In January 2008 the NERP introduced the National Trading Scheme. This scheme ensures that "existing" LCPs (See point 2 above) are able to trade their annual allowances for sulphur dioxide (SO₂), nitrogen oxides (NOx) and particulates with other LCPs within the Scheme.

Operators of existing LCPs were given the option by the Department for Environment, Food and Rural Affairs (Defra) to decide whether to:

1. "Opt In" under the annual mass-based NERP; or
2. "Opt In" under the concentration based Emission Limit Values (ELVs); or
3. "Opt Out" by taking the limited life Derogation.

Ultimately 92 LCPs (operated by 40 different operators) have chosen to opt into the NERP; 18 LCPs in Scotland, one in Northern Ireland and the remaining 73 in England and Wales. The remaining LCPs either "Opted In" under the ELV scheme or "Opted Out" of both the NERP or ELV schemes.

Currently, NERP data for all LCPs is submitted to the Environment Agency (EA), which collates relevant data and produces the NERP report which is published on the EA's website. Data relating to LCPs that have "Opted Out" of both the ELV and NERP schemes and LCPs that have "Opted In" to the ELV scheme report to their respective Environment Agencies, e.g. Scottish LCPs report to the Scottish Environment Protection Agency (SEPA).

P226 aims to ensure that data relating to the LCPD is made available to all interested parties in a manner that is efficient, effective and economically acceptable to all.

1.2 The Issue

Although the information detailed above is currently supplied to and published by the respective Environmental Agencies² (EAs), the Proposer believes that the data is not published in a format suitable for participants wanting to understand the supply/demand fundamentals of the wholesale electricity market.

Issues highlighted by the Proposer include:

- Market critical data is incomplete and not always in a form that is readily accessible or easy for BSC Parties or customers to understand;
- Data is not published in a timely manner; and

² Environmental Agencies will refer to the Environment Agency and Scottish Environmental Protection Agency

- Information relating to derogations applied for by 'Opted In' LCPs is not provided.

1.3 Summary of Proposed Modification Solution

P226 seeks to enhance the visibility of current and applied for emission limits/allocations and operating hours data for all LCPs through the publication of such data on the BMRS.

The intent is to ensure that data is published in:

- A timely manner;
- A form that is readily understandable to the market; and
- A place that is readily available to BSC Parties.

To achieve this, P226 proposes the following 8 data items are published on the BMRS:

1. A register of BM Units that are part of an LCP under the terms of the LCPD;
2. The status of each LCP:
 - a. Opted Out Plant;
 - b. Opted In Plant under NERP; or
 - c. Opted In Plant under ELV;
3. The cumulative operational hours from 1 January 2008 to date for each LCP;
4. The remaining operational hours for each LCP for Opted Out Plant;
5. A summary of NERP and ELV (B specific limit) allowances bought and sold since 1 January 2008 and over the last month;
6. Details of any derogation applications for each Opted In LCP applied for but awaiting a decision, (including both applications for operation under Article 5(1) resulting from a delay in fitting Flue Gas Desulphurisation (FGD) equipment, and from breakdown of existing FGD equipment);
7. Details of any derogation applications for each Opted In LCP that have been granted;
8. The latest emission limits for each Opted In LCP.

Further details on each of these data items and the surrounding requirements can be found in the section 3 below.

1.4 Summary of Alternative Modification Solution

The solution for P226 Alternative Modification is similar to the Proposed Modification solution, except that it focuses on publishing those data items that provide information on operating hours and derogations.

As such the Alternative Modification solution proposes to publish the following 4 data items:

3. The cumulative operational hours from 1 January 2008 to date for each LCP;
4. The remaining operational hours for each LCP for Opted Out Plant;
6. Details of any derogation applications for each Opted In LCP applied for but awaiting a decision, (including both applications for operation under Article 5(1) resulting from a delay in fitting FGD equipment, and from breakdown of existing FGD equipment);
7. Details of any derogation applications for each Opted In LCP that have been granted;

These data Items are *the same as* data items 3, 4, 6 and 7 of the P226 Proposed Modification Solution. Again, further details on each of these data items and their requirements can be found in the sections below.

2 SCOPE OF P226

P226 (both the Proposed and Alternative) seeks to place an obligation on those BSC Parties that are responsible for registering BM units associated with LCPs (under the terms of the LCPD) to report the relevant data items to BSCCo. Neither P226 nor the Alternative would apply to demand BM Units, or to generators whose power stations fall outside the scope of the Directive (e.g. gas turbines licensed before 27 November 2002).

The P226 Group ('the Group') further clarified the scope by determining that P226 would only apply to BM units that have the following characteristics:

- Comprises all or part of an LCPD plant;
- Is a Production BM Unit;
- Is registered in CVA; and
- Is connected to the Transmission System.

Note that the scope may be refined following receipt of impact assessment responses and further assessment of P226.

3 DETAIL OF PROPOSED MODIFICATION SOLUTION REQUIREMENTS

The proposal will make it mandatory for BSC Parties (i.e. BSC Parties responsible for BM units associated with LCPs)³ to supply specific information to BSCCo every month and not later than 28 days after the end of each calendar month, by electronic means.

The BMRA will update the appropriate pages of the BMRS within a specified number of days and maintain an accessible archive of past months' reports. Any corrections must be submitted, by the relevant BSC Party, within a specified number of days after the discovery of an error.

The following table summarises the P226 requirements. Detailed descriptions of the reporting requirements can be found in Sections 3.1 – 3.8 below.

Table 1: Summary of P226 Reporting Requirements

Ref	Reporting Requirement	Obligation	Frequency of Reporting
1.	A register of BM Units that are part of a LCP under the terms of the Directive.	BSC Party / BMRA	To be submitted by the relevant BSC Party during the P226 implementation phase. BSC Parties will be required to inform BSCCo of any subsequent changes. The BMRA will develop and publish the register (on the BMRS) using data received during the P226 implementation phase. The BMRA will update the BMRS within 1 working day of receiving notifications of errors or changes to the register.
2.	The status of each LCP: a) Opted Out Plant b) Opted In Plant under NERP c) Opted In Plant under ELV.	BSC Party / BMRA	To be submitted by the relevant BSC Party during the P226 implementation phase. BSC Parties will be required to inform BSCCo of all subsequent changes. The BMRA will update the BMRS within 1 working

³ Refer to section 2, 'Scope', for clarification of BSC Parties impacted by P226

Ref	Reporting Requirement	Obligation	Frequency of Reporting
			day of receiving notifications.
3.	The cumulative operational hours for Opted Out LCPs and LCPs with derogations under Article 5.1, 7.1, 7.1 (a) of LCPD	BSC Party	BSC Parties will report within 28 days after the end of each calendar month. The BMRA will update the BMRS within 1 working day of receiving this notification.
4.	The remaining operational hours for each LCP for Opted Out Plant.	BMRA	The BMRA will update the BMRS with this information within 1 working day of receiving reporting requirement 3 (see above).
5.	A summary of NERP and ELV 'B specific limit' allowances bought and sold since 1 January 2008 and over the last month.	BMRA	The BMRA will produce a monthly report on the BMRS for this requirement.
6.	Details of any derogation applications for each Opted In LCP applied for but awaiting a decision.	BSC Party	BSC Parties will report within 1 working day of submitting an application. The BMRA will update the BMRS within 1 working day of receiving this notification.
7.	Details of any derogation applications for each Opted In LCP that have been granted.	BSC Party	BSC Parties will report within 1 working day after receiving notification of a derogation being granted. The BMRA will update the BMRS within 1 working day of receiving this notification.
8.	The latest emission limits for each Opted In LCP.	BSC Party	BSC Parties will report within 28 days after the end of each calendar month, or within 1 working day of a change to emission limits. The BMRA will update the BMRS within 1 working day of receiving this notification.

3.1 Reporting Requirement 1: Register of BM units

As part of the implementation of P226, BSC Parties will be obligated to provide a list of their BM Units that are registered to associated LCPs. For example:

LCP A - BM Unit 1

BM Unit 2

A consolidated list will be developed by the BMRA and published on the BMRS. BSC Parties will be required to inform BSCCo of any discrepancies/changes that occur once the register has been published. As necessary, the BMRA will update the BM Unit register within 1 Working Day.

3.2 Reporting Requirement 2: LCP Status

As part of the implementation of P226, BSC Parties will be obligated to inform BSCCo of the status of each of their associated LCP, stating whether the LCP is an:

- Opted Out Plant;
- Opted In Plant under NERP; or
- Opted In Plant under ELV.

This information will be submitted during the P226 implementation phase. The BMRA will create a consolidated list and publish on the BMRS. BSC Parties will be required to inform BSCCo of any discrepancies/changes that occur once the list has been published. As necessary, the BMRA will update the list within 1 Working Day.

3.3 Reporting Requirement 3: Cumulative Operational Hours

BSC Parties will be required to provide information regarding each associated LCP's cumulative operational hours⁴.

The obligations on BSC Parties are:

- For Opted Out LCPs:

BSC Parties will be required to submit their cumulative operating running hours, from the 1st January 2008, to the BSCCo every month no later than 28 days after the end of each calendar month.

This requirement relates to LCPs that have "Opted Out" of the National Emission Reduction Plan (NERP) and Emission Limit Value (ELV) under Article 4(4) of the LCPD.

Article 4(4) of the LCPD provides for operators of existing plants to be exempted from compliance with ELVs or a NERP if they made a written declaration by 30 June 2004 not to operate the plant for more than 20,000 operational hours starting from 1 January 2008 and ending no later than 31 December 2015.

- For LCPs with a derogation under Article 5.1 of the LCPD:

BSC Parties that are associated to an LCP that has been granted a 5.1 derogation, or an extension to a 5.1 derogation, will be required to submit their cumulative operational hours from the commencement of the derogation to BSCCo every month and no later than 28 days after the end of each calendar month.

LCPs who apply for a derogation under Article 5.1 are required to provide their respective Environment Agency with a requested start and end date for the derogation (minimum period of 1 month). The 2000 hours per year allowed for under this derogation is then pro-rated over the requested derogation period to reflect the average monthly load factor of the respective LCP. The pro-rated limit on operating hours would continue to apply until the end of the derogation.

- For LCPs with a derogation under Article 7.1 and 7.1 (a) of the LCPD:

BSC Parties that are associated with an LCP that has been granted a 7.1 or 7.1 (a) derogation will be required to submit their cumulative operational hours from the commencement of the derogation to BSCCo every month and no later than 28 days after the end of each calendar month.

For the avoidance of doubt, cumulative operational hours within this section refers to the 120 hours that is awarded in terms of Article 7.1.

For requirement 3, the BMRA will ensure that the BMRS is updated on a monthly basis, within 1 day of receiving the information. In addition, the BMRA will ensure that an archive of historical data is maintained on the BMRS.

3.4 Reporting Requirement 4: Remaining Operational Hours

The BMRA will be report on the remaining hours for each "Opted Out" LCP based upon the information submitted within reporting requirement 3.

⁴ As defined in the Electricity Supply Industry - Pollution Prevention Control (ESI PPC) permit template

The BMRA will be responsible for ensuring that the cumulative hours for each "Opted Out" LCP is subtracted from the 20,000 allocated hours (see requirement 3, section 3.3).

The BMRA will ensure that the BMRS is updated on a monthly basis, within 1 day of receiving the information. In addition, the BMRA will ensure that an archive of historical data is maintained.

3.5 Reporting Requirement 5: NERP and ELV 'B Specific Limits' Traded

The BMRA will be required to provide a monthly report on the BMRS that will include:

- Date of transfer;
- Transfer amount; and
- New transfer limit.

This data will be drawn directly from the EA website (subject to agreement) by the BMRA. The BMRA will ensure that the BMRS is updated on a monthly basis, and will correct the BMRS within 2 Working Days of receiving any corrections.

3.6 Reporting Requirement 6: Application for Derogations

For "Opted In" LCPs, BSC Parties will be required to provide BSCCo details relating to the derogations, or derogation extensions, that have been applied for under Articles 5.1, 7.1 or 7.1 (a) of the LCPD.

Within 1 working day of its formal submission of an application for a derogation, or derogation extension, the BSC party will be required to submit the following information relating to the application:

- Start date of derogation;
- End date of derogation; and
- Number of hours requested under the derogation.

The BMRA will ensure that the BMRS is updated on a monthly basis, within 1 day of receiving the information.

3.7 Reporting Requirement 7: Granted Derogations

Within 1 working day of an "Opted In" LCP being granted a derogation under Article 5.1, 7.1 or 7.1 (a) the relevant BSC Party will be required to submit the following details to BSCCo:

- Start date of derogation;
- End date of derogation; and
- Number of hours requested under the derogation.

The BMRA will ensure that the BMRS is updated on a monthly basis, within 1 day of receiving the information.

3.8 Reporting Requirement 8: Emission limits for Opted In LCPs

BSC Parties associated with LCPs that have registered under this scheme, will be required to report to BSCCo:

- Changes to emission limits (within 1 day). The following information will be submitted by the relevant BSC Party:
 - Date of transfer;
 - Transfer amount; and
 - New transfer limit.

- Latest emission limits. If there have been no changes to emission limits during the month, the relevant BSC Party will submit the latest emission limits to the BSCCo no later than 28 days after the end of each calendar month.

The BMRA will ensure that the BMRS is updated on a monthly basis, or within 1 day of receiving the information.

4 DETAIL OF ALTERNATIVE MODIFICATION SOLUTION REQUIREMENTS

The solution for P226 Alternative Modification is similar to the Proposed Modification solution, except that it focuses on publishing those data items that provide information on operating hours and derogations. As such, some data items under the Proposed Modification are not required under the Alternative solution.

Under the Alternative Modification, the relevant BSC Parties will only be required to submit information outlined in the table below: (For avoidance of doubt the requirements and timescales for data items remaining part of the Alternative solution, will be the same as those in the Proposed solution.)

Table 2: Summary of Alternate Modification Reporting Requirements

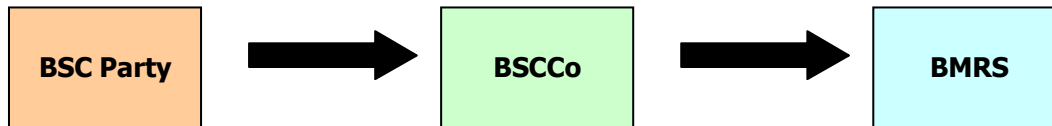
Ref	Proposed Reporting Requirement	Obligation	Frequency of Reporting
3.	The cumulative operational hours for Opted Out LCPs and LCPs with derogations under Article 5.1, 7.1, 7.1 (a) of LCPD.	BSC Party	BSC Parties will report within 28 days after the end of each calendar month. The BMRA will update the BMRS within 1 working day of receiving this notification.
4.	The remaining operational hours for each LCP for Opted Out Plant.	BMRA	The BMRA will update the BMRS with this information within 1 working day of receiving reporting requirement 3 (see above).
6.	Details of any derogation applications for each Opted In LCP applied for but awaiting a decision.	BSC Party	BSC Parties will report within 1 working day of submitting an application. The BMRA will update the BMRS within 1 working day of receiving this notification.
7.	Details of any derogation applications for each Opted In LCP that have been granted.	BSC Party	BSC Parties will report within 1 working day after receiving notification of a derogation being granted. The BMRA will update the BMRS within 1 working day of receiving this notification.

Please note that the requirement reference for the requirements under the Proposed and Alternative has been kept consistent to avoid confusion. The requirements 3, 4, 6 and 7 listed in the table above are detailed in sections 3.3, 3.4, 3.6 and 3.7 respectively.

The Alternative Modification also makes reference to SEPA, ensuring that the scope of P226 includes the entire UK i.e. P226 Alternative will refer to both the EA and SEPA.

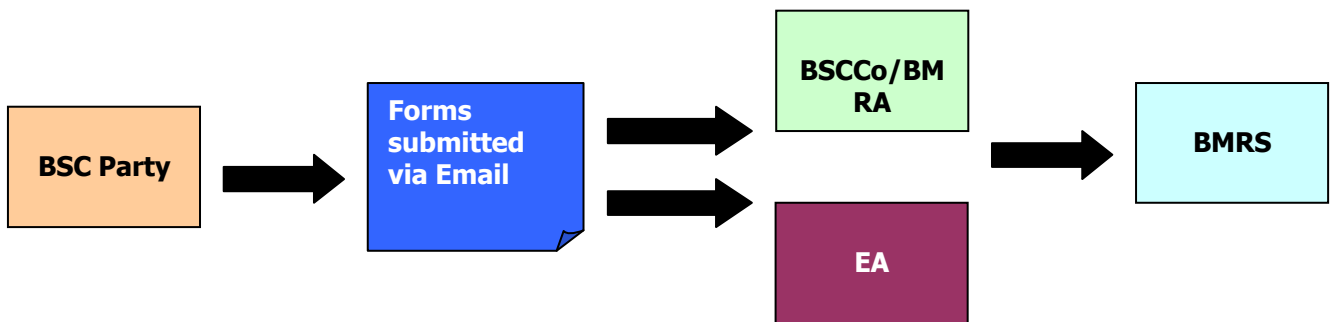
5 IMPLEMENTATION OPTIONS

P226 will create an obligation on BSC Parties (as defined within the scope of P226, in section 2 of this document) to submit information pertaining to emission limits/allocations and operating hours data of all associated LCPs. The reporting process will follow the following high level procedure:



The Group outlined two reporting options for the Proposed and Alternative Modifications. The two options will introduce a system whereby BSC Parties will be required to submit information as stipulated within the Proposed and Alternative Modifications.

The submission of data items will follow a similar procedure as is currently being adhered to when submitting data to the EA. BSC Parties will be required to complete the standard EA forms and submit them to the EA and the BSCCo/BMRA simultaneously.



Data items that are not currently included on the standard reporting form e.g. derogation applications; derogations granted etc will have to be submitted, to the BSCCo/BMRA, in a similar format to that currently being followed when submitting to the EA. These data items are submitted to the EA on an ad-hoc basis, via email request that is sent to the relevant EA representative applying for a derogation.

The process of validating and ultimately publishing the data on the BMRS will differ for each option. These processes are described in the sections below:

5.1 Option 1: Full Trading Platform

Option 1 will introduce a system whereby data will be extracted from emails received, via a manual process, and entered into the BMRS. The process of validating the information will be automated at the point that data is entered into the system.

This solution would report LCP related data items in a similar way to existing BMRS data items.

In particular:

- The BMRS would generate and publish a TIBCO Rendezvous message for each item of LCPD data at the point that it was loaded into the database, providing automatic notification to High Grade BMRS Users of the new data.
- The BMRS would make both current and historic LCPD data available to Low Grade and High Grade BMRS Users in tabular and CSV format.
- The BMRS would allow querying of LCPD data using relevant search criteria (e.g. month, LCPD Plant Name)

5.2 Option 2: Manual Reporting System

Option 1 will introduce a system whereby data will be extracted from emails received, via a manual process, and a spreadsheet of consolidated LCP data will be updated accordingly. Validation of the information will require a manual process of ensuring that the data is accurate and within reasonable ranges.

This solution would report LCP related data items in a similar way to that reported by the EA. Excel type spreadsheets will be published that will include:

1. Consolidated LCP data as defined within the Proposed and Alternative Modifications;
2. Archives of previous versions of the reports

5.3 Summary

Obligations arising from the Proposed and Alternative Modifications are not intended to place an undue burden upon BSC Parties. The intention is to ensure that certain market critical information is reported in a timely manner and in a form that is understandable to all. The obligations that are placed upon BSC Parties align to reporting procedures that are currently used by the EA, this minimises the effects of the additional reporting requirements and ensures that BSC Parties are not unduly impacted by the obligations.

6 ESTIMATED IMPACT OF MODIFICATION ON SYSTEMS, PROCESSES AND DOCUMENTATION

a) Impact on BSC Systems and Processes

System / Process	Impact of Proposed/Alternative Modification
Balancing Mechanism Reporting System (BMRS)	Reporting system requirements may need to be included/updated within the BMRS

b) Impact on BSC Agent Contractual Arrangements

No potential impact.

c) Impact on BSC Parties and Party Agents

It is anticipated that P226 will have an impact on:

- **Generators:** BSC Parties that have registered the relevant BM units associated with LCP (under the terms of the Directive), will be required to supply the specified information to BSCCo every month.
- **BSC Agent (BMRA):** The BMRA will be impacted, and will provide a detailed assessment based upon information in this document.

d) Impact on Transmission Company

No potential impact.

e) Impact on BSCCo

Area of Business	Impact of Proposed/Alternative Modification
Corporate Services	Providing project assurance for the implementation of this modification.
Legal	Advising the Modification Group and drafting legal text.
Change Implementation	Manage and implement that change as part of a planned release.

f) Impact on Code

Code Section	Impact of Proposed/Alternative Modification
V	The requirement to report LCPD data on the BMRS.
Q	The requirement on Parties to provide the data.
X	Changes to definitions.

g) Impact on Code Subsidiary Documents

Document	Impact of Proposed/Alternative Modification
BSCP	Depending on the solution adopted for submitting data a new BSCP may be required to describe the procedures.
BMRA Service Description	These documents may require updating as a result of new obligations placed upon the BMRA.

h) Impact on Core Industry Documents/System Operator-Transmission Owner Code

No potential impact.

i) Impact on Other Configurable Items

Document	Impact of Proposed/Alternative Modification
IDD Part 1	These documents may require updating as a result of new obligations placed upon the BMRA.
BMRA URS	These documents may require updating as a result of new obligations placed upon the BMRA.

j) Impact on BSCCo Memorandum and Articles of Association

No potential impact

k) Impact on Governance and Regulatory Framework

No potential impact

7 DEVELOPMENT PROCESS

For the purposes of the impact assessment, respondents should assume that P226 would be implemented as a stand-alone development project managed by BSCCo.

8 TERMS USED IN THIS DOCUMENT

Other acronyms and defined terms take the meanings defined in Section X of the Code.

Acronym/Term	Definition
BMRS	Balancing Mechanism Reporting System
ELV	Emission Limit Value
LCPD	The Large Combustion Plant Directive (LCPD) (2001/80/EC)
MWth	Mega Watt Thermal
NERP	National Emission Reduction Plan

9 DOCUMENT CONTROL**9.1 Authorities**

Version	Date	Author	Reviewer	Reason for Review
0.1	25/09/08	Stuart Holmes	Adam Lattimore	For technical review
0.2	30/09/08	Stuart Holmes	SSMG	For Modification Group review
1.0	03/10/08	P226 Modification Group		For impact assessment

9.2 References

Ref.	Document Title	Owner	Issue Date	Version
1	P226 IWA: [include hyperlink if available]		05/09/08	