

P237 Report Phase Consultation Responses

Consultation issued on 14 September 2009

We received responses from the following Parties:

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Company	No. BSC Parties / Non-Parties Represented	Role of Parties/ Non-Parties represented
SAIC Ltd. (for and on behalf of ScottishPower)	7/0	Supplier / Generator / Trader / Consolidator / Exemptable Generator / Distributor
E.ON UK	6/0	Supplier / Generator / Trader / Consolidator / Exemptable Generator
Centrica	10/0	Supplier / Generator / Trader
RWE Supply & Trading GmbH	10/0	Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent
Scottish and Southern Energy plc.	11/0	Supplier / Generator / Trader / Distributor
Greater Gabbard Offshore Winds Limited	1/0	Generator
Energy Technical & Commercial Services Ltd (for and on behalf of DONG)	1/1	Exemptable generator (current BSC Party) / Generator (to become a BSC Party shortly)

Question 1: Do you agree with the Panel's initial view that P237 will not unduly disadvantage Onshore intermittent generators (or unduly advantage Offshore intermittent generators)?

Summary

Yes	No	Neutral/Other
7	0	0

Responses

Respondent	Response	Rationale
SAIC Ltd	Yes	We agree with the group's assessment that, as Onshore PPMs are only allowed a single TS connection, the issue is restricted to Offshore PPMs only. There should be no disadvantage to the onshore PPM operators.
E.ON UK	Yes	P237 would result in more equitable treatment of Onshore and Offshore generation. It would not advantage Offshore intermittent generators merely address the disadvantage these face from the Offshore Transmission Regime's shift of the ownership boundary offshore to the LV side of the transformers and introduction of separate definitions for Onshore and Offshore Power Park Modules (stipulating that the latter only must connect to the same busbar or collection of directly electrically connected busbars). With the current BSC requirement for each PPM to be a BMU this means more PPMs, hence more BMUs offshore, with intermittent generators risking having to apply for a non-standard BMU configuration if desired, or potentially register and service more BMUs than desired or the SO needs. Onshore Intermittent generators would not be disadvantaged as this would not be case Onshore. Onshore configurations tend to be simpler anyway: as the Report highlights, more complex designs are a function of the offshore nature of such assets.
Centrica	Yes	Centrica supports the view and rationale of the modification group which has been endorsed by the Panel. The introduction of P237 would not disadvantage (duly or not) any existing onshore wind farms. The examples in Attachment A of the report show that the number of BM Units is already minimised for existing onshore wind farms. There are no examples where an existing onshore wind farm would be required to

Respondent	Response	Rationale
		<p>retain more BM Units than an equivalently designed offshore wind farm.</p> <p>However, the examples show that without P237, there would be an undue disadvantage to existing offshore wind farms (or those in the process of construction) who would have to register a higher number of BM Units for an equivalently designed wind farm. This is despite there being no additional benefit to the System Operator from the existence of the additional BM Units offshore.</p> <p>New onshore wind farm developments would be able to continue to be considered as a single power park module, thus retain a means to minimise the number of BM Units required.</p>
RWE Supply & Trading GmbH	Yes	The proposed solution is a more efficient arrangement for offshore generators when compared with the current baseline.
Scottish and Southern Energy plc.	Yes	SSE support the arguments and rationale set out by the Modification Group. SSE believe that the change is only required for offshore wind generators as a result of specific Grid Code amendments to the offshore boundary definition (that applies only to offshore wind generators). This definition creates a distinct class of asset. Combine this with the necessary redundancy and increased switching capability required to maximise plant utilisation in a difficult maintenance environment (a scenario unlikely to apply to onshore wind given planning restrictions and relative ease of access for maintenance); and SSE believe that it is appropriate to limit the scope of the modification to this class of asset.
Greater Gabbard Offshore Winds Limited	Yes	-
Energy Technical & Commercial Services Ltd	Yes	Onshore wind generators will not be unduly disadvantaged by removing this unnecessary cost for offshore wind generators.

Question 2: Do you agree with the Panel's initial recommendation that P237 will better facilitate the achievement of Applicable BSC Objectives (b), (c) and (d) when compared with the existing BSC requirements, and that P237 should therefore be approved?

Summary

Yes	No	Neutral/Other
7	0	0

Responses

Respondent	Response	Rationale
SAIC Ltd	Yes	ScottishPower agree with the group's view that the Modification as Proposed will better the applicable Objectives. The efficiency savings from a reduced number of BM Units will reduce the burden on the Transmission Company, Parties and ELEXON (and their Agents) will better Objectives b), c) and d). Proposed Modification P237 should, therefore, be approved.
E.ON UK	Yes	E.ON agrees with the Panel that Objectives (b), (c) and (d) would be furthered by removing the current excessive BMU requirements for Offshore generation. Allowing the generator the option to aggregate PPMs into BMUs, or not, would be most efficient for all concerned, reducing risk and cost to developers/generators, make it easier for the Transmission Company to instruct offshore generators, and enable efficient balancing and settlement by potentially reducing the number of BMUs and associated requirements that BSC Agents must handle.
Centrica	Yes	Centrica supports the view and rationale of the modification group which has been endorsed by the Panel.
RWE Supply & Trading GmbH	Yes	For the reasons outlined in the Report.
Scottish and Southern Energy plc.	Yes	SSE wholly support the views expressed by the modification group and the BSC Panel.
Greater Gabbard Offshore Winds Limited	Yes	-

Respondent	Response	Rationale
Energy Technical & Commercial Services Ltd	Yes	Avoids the cost of unnecessary additional BMU registration.

Question 3: Do you agree with the additional combined benefits of P237, P238 and P240 which are identified in the Draft Modification Report?

Summary

Yes	No	Neutral/Other
7	0	0

Responses

Respondent	Response	Rationale
SAIC Ltd	Yes	We agree that the benefits of P237 are enhanced when the additional benefits of P238 and P240 are factored in. All three changes ease the technical and administrative burden on offshore generators and ELEXON / National Grid, and as a package of change reduce the cost to offshore generators.
E.ON UK	Yes	Without P238, P237 would only benefit the BMU <i>and</i> metering requirements for certain configurations. Both the offshore standard BMU configurations and requirement for metering to be physically situated at the boundary point should be addressed as soon as possible. Similarly P240 would also enable offshore growth, so though not dependent on each other these 3 modifications together potentially reduce uncertainty, risk and costs removing significant barriers to offshore development.
Centrica	Yes	Because P237 allows for less BM Units and P238 allows for metering such that exports/imports at the BM Units can be determined, then having the two modifications together allows for greater efficiencies. The benefits of the two modifications in combination exceed the sum of the benefits of each modification on its own. It is envisaged that the inclusion of P240 would provide benefits for specific types of configurations that would be, in part, dependent on the implementation of P237 and P238.

Respondent	Response	Rationale
RWE Supply & Trading GmbH	Yes	The proposed solution is the most efficient way of implementing the proposals.
Scottish and Southern Energy plc.	Yes	Whilst each of the modifications have their own merits and can deliver benefits in their own right, the combination of the 3 modifications delivers the maximum benefits and investment certainty for offshore wind development projects.
Greater Gabbard Offshore Winds Limited	Yes	-
Energy Technical & Commercial Services Ltd	Yes	Reduced costs.

Question 4: Do you agree with the Panel's recommended Implementation Date (for both the BSC and BSCP15 changes) of 5 Working Days after an Authority decision?

Summary

Yes	No	Neutral/Other
7	0	0

Responses

Respondent	Response	Rationale
SAIC Ltd	Yes	These changes are mainly administrative in nature (changes to the BSC etc) and do not require any system changes. They should be implemented as soon as possible.
E.ON UK	Yes	Implementation should take place as soon as possible to remove this barrier to development of Offshore intermittent generation.
Centrica	Yes	-
RWE Supply & Trading GmbH	Yes	There is no reason to delay implementation.
Scottish and Southern Energy plc.	Yes	Given that there are no system impacts associated with this modification and desire to have the proposed rules in place prior to OFTO going live, a short and swift implementation date is warranted.

Respondent	Response	Rationale
Greater Gabbard Offshore Winds Limited	Yes	-
Energy Technical & Commercial Services Ltd	Yes	Urgently needed to clarify the position for projects in the OFTO transitional tenders.

Question 5: Do you agree that the Panel's recommended legal text and BSCP15 changes deliver the solution agreed by the Modification Group?

Summary

Yes	No	Neutral/Other
7	0	0

Responses

Respondent	Response	Rationale
SAIC Ltd	Yes	The legal text and BSCP changes are appropriate to deliver the Proposed Modification.
E.ON UK	Yes	They appear appropriate.
Centrica	Yes	-
RWE Supply & Trading GmbH	Yes	-
Scottish and Southern Energy plc.	Yes	It seems to deliver the intent of the group.
Greater Gabbard Offshore Winds Limited	Yes	-
Energy Technical & Commercial Services Ltd	Yes	Drafting meets the stated aim.

Question 6: Do you have any further comments on P237 that you would like the Panel to consider?

Summary

Yes	No	Neutral/Other
0	7	0

Responses

Respondent	Response	Rationale
SAIC Ltd	No	-
E.ON UK	No	-
Centrica	No	-
RWE Supply & Trading GmbH	No	-
Scottish and Southern Energy plc.	No	-
Greater Gabbard Offshore Winds Limited	No	-
Energy Technical & Commercial Services Ltd	No	-