P237 Assessment Consultation Responses

What stage is this document in the process?

01 Initial Written Assessment
02 Definition Procedure
03 Assessment Procedure
04 Report Phase

Consultation issued on 28 July 2009

We received responses from the following Parties:

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 / Exemptible Generator / Distributor
Centrica	10/0	Supplier/Generator/ Trader
E.ON UK	6/0	Supplier/Generator/ Trader/Consolidator/ Exemptable Generator
Greater Gabbard Offshore Winds Limited	1/0	Generator

Question 1: The Group considers that the specific issue which P237 identifies is limited to Offshore generator configurations. It therefore believes that P237 creates no disadvantage for onshore intermittent generators. Do you agree?

Summary

Yes	No	Neutral/Other
4	0	0

Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	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.
Centrica	Yes	Centrica supports the reasons of the Modification Group. The definition for Offshore Power Park Module as introduced by the Offshore Transmission Regime creates different treatment for onshore and offshore intermittent generation. This modification is seeking to minimise the impact of this different treatment on the number of BM Units required.
E.ON UK	Yes	As P237 was only raised in response to the 24/06/09 Grid Code introduction of separate definitions of Onshore and Offshore Power Park Modules for the new Offshore Transmission regime, stipulating that an Offshore PPM only must connect to the same busbar or collection of directly electrically connected busbars. As the BSC currently requires each PPM to be a BMU, Offshore generators only are thus disadvantaged by potentially having to apply for a non-standard BMU configuration, or register and service more BMUs than the Transmission Company needs to operate the system. The proposal would redress this. Onshore configurations tend to be simpler anyway with typically one substation; multiple substations are more likely offshore (where significant future intermittent developments also seem most likely to be sited).
Greater Gabbard Offshore Winds Limited	Yes	GGOWL believes that the specific issue which P237 seeks to address is limited to offshore generation. Primarily offshore, as 132 kV voltages are now included as transmission, this generates potentially more points that can be defined as Power Park Module. This is not the generic case onshore as the transmission voltages remain at 275 kV and 400 kV, limiting the number of points definable as Power Park Modules.

Question 2: The Group believes that P237 will better facilitate the achievement of Applicable BSC Objectives (b), (c) and (d) when compared with the existing BSC requirements. Do you agree?

Summary

Yes	No	Neutral/Other
4	0	0

Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	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).
Centrica	Yes	Centrica supports all the reasons provided by the Modification Group.
E.ON UK	Yes	E.ON agrees with the Group views that Objective (c) would be furthered by removing the current excessive BMU requirements for offshore generation. This will also support Objectives (b) and (d) by promoting efficiency in operation of the Transmission System and of the balancing and settlement arrangements, e.g. by reducing the number of required Physical Notifications and Bid Offer Acceptances.
Greater Gabbard Offshore Winds Limited	Yes	GGOWL believes that P237 will allow an offshore generator to register a collection of offshore generating units and the associated electrical network, to reflect the most cost efficient and best engineering solution to collectively control the active and reactive output power.

Question 3: Would P237 deliver efficiency/administrative benefits for your organisation? The Group would also welcome any details of cost-savings which you might achieve from P237.

Summary

Yes	No	Neutral/Other
4	0	0

Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	Yes	There will be administrative savings to ScottishPower in registering, maintaining and providing data for BM Units which are strictly not required to operate the Offshore installation.
Centrica	Yes	We expect administrative savings from a requirement to have less BM Units. These relate to initial BM unit set up costs (including software licensing, data handling, human resource) of at least £11.5k per BM Unit. There would also be some ongoing savings from reduced data flows and as described in the consultation document such as from reduced administration to submit BM Unit information (FPNs, MILs MELs, SELs, Bids and Offers) on an ongoing basis. In addition, the modification will provide certainty for our future projects. Centrica currently has 3 prospective offshore wind farms amounting to 1.25GW of generation. Certainty of BSC requirements would provide efficiency benefits in the design and planning of these projects. Current uncertainty absorbs internal resource to cater for multiple scenarios.
E.ON UK	Yes	We believe approval of P237 would not impact E.ON's existing intermittent offshore generation in the UK at Blyth and Scroby Sands. However it should assist project planning and possibly lower costs by clarifying and simplifying the potential BMU requirements/options for E.ON's larger offshore wind projects still being developed/constructed (e.g. Humber Gateway, London Array, Robin Rigg, Scarweather Sands).

Respondent	Response	Rationale
Greater Gabbard Offshore Winds Limited	Yes	There will be administrative savings to GGOWL in registering, maintaining fewer BM Units, however the significant savings will only be achieved if P238 and yet-to-be considered P240 are also accepted and implemented.

Question 4: The Group believes that the combined benefits of P237 and P238 will be greater than those which arise individually from each proposal. Although P240 has yet to receive further assessment, the Group believes it is likely that this will also have additional benefits in combination with P237/P238. Do you agree?

Summary

Yes	No	Neutral/Other
4	0	0

Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	Yes	We agree that the benefits of P237 are enhanced when the additional benefits of P238 (and the as yet un-assessed P240) are factored in. All three changes easy the technical and administrative burden on offshore generators and ELEXON / National Grid, and as a package of change reduce the cost to offshore generators.
Centrica	Yes	Because P237 allows for less BM Units and P238 allows for metering such that exports/imports at the BM Unit can be determined, then having the two modifications together allows for greater overall 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
E.ON UK	Yes	P237 would have little effect without P238, these 2 proposals need to be implemented together so that both the Offshore PPM requirement for excessive BMU and for metering to be physically situated at the boundary point are removed from the BSC. Similarly to be effective P240 needs P237 and P238.
Greater Gabbard Offshore Winds Limited	Yes	GGOWL strongly agree.

Question 5: The Group believes that the P237 changes to the BSC and to BSCP15 should be implemented 5 Working Days after an Authority decision. It believes that ELEXON should raise a separate Change Proposal to introduce examples of Offshore Aggregation Rules to BSCP75, once the Authority has made its decisions on all of the current Modification Proposals which relate to Offshore requirements. Do you agree?

Summary

Yes	No	Neutral/Other
4	0	0

Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	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.
Centrica	Yes	This approach seems sensible.
E.ON UK	Yes	This makes sense. Implementation of P237 and relevant changes to the BSC and BSCP15 should take place as soon as possible. Examples in BSCP75 would be helpful.
Greater Gabbard Offshore Winds Limited	Yes	GGOWL would like to see the changes implemented in a reasonable workable timescale.

Question 6: Do you believe that there any alternative solutions to the issue which the Modification Group has not identified, and which it should consider?

Summary

Yes	No	Neutral/Other
0	4	0

Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	No	-
Centrica	No	-
E.ON UK	No	-
Greater Gabbard Offshore Winds Limited	No	GGOWL presently do not foresee a different solution the P237.

Question 7: Do you have any further comments on P237 that you would like the Modification Group to consider?

Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	No	-
Centrica	No	-
E.ON UK	No	-
Greater Gabbard Offshore Winds Limited	No	GGOWL has no further comments.