

## P238 Consultation Responses

Consultation issued on 14 September 2009

We received responses from the following Parties

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
<b>SAIC Ltd. (for and on behalf of ScottishPower)</b>	<b>7/0</b>	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
<b>E.ON UK</b>	<b>6/0</b>	Supplier/ Generator/ Trader/ Consolidator/ Exemptible Generator
<b>Centrica</b>	<b>10/0</b>	Supplier/ Generator/ Trader
<b>RWE</b>	<b>10/0</b>	Supplier/ Generator/ Trader / Consolidator / Exemptible Generator / BSC Agent / Party Agent / Distributors / other – please state): Supplier/Generator/ Trader / Consolidator / Exemptible Generator / Party Agent
<b>SSE</b>	<b>11/0</b>	Supplier/ Generator/ Trader/ Distributor
<b>Greater Gabbard Offshore Winds Limited</b>	<b>1/0</b>	Generator
<b>Energy Technical &amp; Commercial Services Ltd (for and on behalf of DONG)</b>	<b>1/1</b>	Exemptible generator / Generator

What stage is this document in the process?

**01** Initial Written Assessment

**02** Definition Procedure

**03** Assessment Procedure

**04** Report Phase

Question 1: Do you agree with the Panel's initial view that P238 will not unduly disadvantage onshore intermittent Generators (or unduly advantage offshore intermittent Generators)?

**Summary**

Yes	No	Neutral/Other
7		

**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.
E.ON UK	Yes	Offshore intermittent generators only are disadvantaged by the new Offshore Transmission Regime moving the boundary between generator assets and the Transmission system to the offshore platform, with the current BSC requirement to meter individual flows at the Boundary Point(s). P238 would redress this and not disadvantage onshore generators.
Centrica	Yes	<p>Centrica supports the view and rationale of the modification group which has been endorsed by the Panel.</p> <p>The introduction of P238 would not disadvantage (duly or not) any existing onshore wind farms as they would have already installed the required metering.</p> <p>However, without P238 there would be an undue disadvantage to existing offshore wind farms (or those in the process of construction) who would have to provide meters in excess of those provided by an equivalent onshore wind farm (and in excess of the requirements at the time of their design). This is despite the baseline metering requirements for offshore wind farms being in excess of what is required for BSC settlement.</p> <p>New onshore developments would be able to be continued to be considered as a single power park module where they meet this criteria, thus retain a means to minimise their metering requirements to the level required for BSC settlement.</p>
RWE	Yes	The proposed solution is a more efficient arrangement for offshore generators when compared with the

Respondent	Response	Rationale
		current baseline.
SSE	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	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:

- 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?

### Summary

Yes	No	Neutral/Other
7		

### Responses

Respondent	Response	Rationale
SAIC Ltd	Yes	ScottishPower agree that the Modification Proposal would better facilitate both Objectives c) and d). We agree that onerous metering requirements add additional cost in both owning and maintaining the asset; and in the administration in registering and collecting / processing data from multiple meters. These cost savings to both Party and ELEXON better

Respondent	Response	Rationale
		facilitate c and d.
E.ON UK	Yes	E.ON agrees with the Panel that Objectives (c) and (d) would be furthered by P238 removing the current excessive metering requirements for offshore generation. Not implementing this proposal would potentially require installation of excessive Settlement metering, administratively inefficient and in some cases posing serious practical difficulties. Further unwarranted and significant costs, health and safety risks and administratively inefficiencies would be incurred by the asset owners and BSC agents to maintain and service any such meters.
Centrica	Yes	Centrica supports the view and rationale of the modification group which has been endorsed by the Panel.
RWE	Yes	For the reasons outlined in the Report.
SSE	Yes	SSE wholly support the views expressed by the modification group and the BSC Panel.
Greater Gabbard	Yes	--
Energy Technical & Commercial Services Ltd	Yes	Avoids the cost of unnecessary additional metering

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

### Summary

Yes	No	Neutral/Other
7		

### Responses

Respondent	Response	Rationale
SAIC Ltd	Yes	We agree that the benefits of P238 are enhanced when the additional benefits of P237 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

Respondent	Response	Rationale
		reduce the cost to offshore generators.
E.ON UK	Yes	It would be most efficient for P237 and P238 to both be implemented promptly so that the BSC stipulates neither excessive BMUs nor Settlement metering as standard for offshore intermittent generation. If only P237 was implemented, further meters would be required for various offshore configurations; if only P238, an application for non-standard BMU configuration would still have to be made by generators wishing to aggregate more than one PPM into one or more BMU. Similarly P240 without P237 would mean plant with the facility to switch output from one circuit to another might have to apply for non-standard BMU configuration to register aggregations of PPMs as one or more BMU.
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 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.
RWE	Yes	The proposed solution is the most efficient ways of implementing the proposals.
SSE	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	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 CoP changes) of 5 Working Days after an Authority decision?

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Yes	No	Neutral/Other
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## 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	P238 should be implemented as soon as possible to remove this current disincentive to Offshore development.
Centrica	Yes	--
RWE	Yes	There is no reason to delay implementation.
SSE	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.
Greater Gabbard	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 CoP changes deliver the solution agreed by the Modification Group?

## Summary

Yes	No	Neutral/Other
7		

## 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 seem appropriate.

Respondent	Response	Rationale
Centrica	Yes	--
RWE	Yes	--
SSE	Yes	It seems to deliver the intent of the group.
Greater Gabbard	Yes	--
Energy Technical & Commercial Services Ltd	Yes	Drafting meets the stated aim

Question 6: Do you have any further comments on P238 that you would like the Panel to consider?

### Summary

Yes	No	Neutral/Other
	7	

### Responses

Respondent	Response	Rationale
SAIC Ltd	No	--
E.ON UK	No	--
Centrica	No	--
RWE	No	--
SSE	No	--
Greater Gabbard	No	--
Energy Technical & Commercial Services Ltd	No	--