

## Stage 03: Transmission Company's Analysis & Impact Assessment

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

#### Response Form

The Modification Group requests your impact assessment of P238.

In particular, the Group asks you to respond to the following questions, giving your reasons for each answer.

#### Transmission Company Questions

##### Question 1:

The Group considers that the specific issue which P238 identifies is limited to offshore intermittent Generators.

It therefore believes that P238 creates no disadvantage for onshore intermittent generators.

*You can find further information in Section 2 of the main consultation document and in Sections 3 of Attachment A.*

##### Do you agree with the Group's view? Why is this?

**Please give your response: Yes**

Insert rationale here

National Grid believes that the specific issue which P238 seeks to address is limited to Offshore generator configurations due to the fact that the Grid Code definition for Offshore Power Park Modules differs from the Onshore Power Park Module definition by allowing Generating Units that connect to the Transmission System at more than one Boundary Point to form a single Offshore Power Park Module.

##### Question 2:

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

*You can find more information in Section 5 of the main consultation document.*

##### Do you agree with the Group's view? Why is this?

**Please give your response: Yes**

Insert rationale here

National Grid believes that P238 will better facilitate applicable BSC objective (c) by allowing offshore Generators to install metering at an equivalent level to onshore generators. This will avoid offshore generators incurring excessive costs relative to their onshore counterparts.

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase



#### Your response

We ask you to respond to the questions in this form.



#### How to return your response

Please email your response to: [modifications@elexon.co.uk](mailto:modifications@elexon.co.uk) by 5pm on Tuesday 11 August 2009.

P238  
Transmission Company  
Analysis

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## Question 2:

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National Grid agrees that minimising data collection requirements on BSC Agents will better facilitate applicable BSC objective (d).

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## Question 3:

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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.

*You can find more information in Section 5 of the main consultation document and in Section 3 of Attachment A.*

### Do you agree with the Group's view? Why is this?

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**Please give your response: Yes**

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Insert rationale here

Whilst National Grid believes that P238 offers benefits in its own right, we consider that the combined benefits of P238, P237 and the yet-to-be-considered P240 are likely to be greater than if P238 were implemented in isolation as they each address a different facet of a more efficient overall solution.

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## Question 4:

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The Group believes that the P238 changes to Section K of the BSC and the relevant Codes of Practice should be implemented **5 Working Days** after an Authority decision.

*You can find more information in Section 4 of the main consultation document.*

### Do you agree with the Group's implementation approach? Why is this?

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**Please give your response: Yes**

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Insert rationale here

National Grid agrees that the proposed approach represents a pragmatic way forward and should ensure that the issue is resolved in a timely manner.

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## Question 5:

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Will P238 affect your ability as the Transmission Company to:

- Discharge your obligations efficiently under the Transmission Licence; and/or
- Operate an efficient, economical and co-ordinated National Electricity Transmission System?

### If yes, how?

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**Please give your response: No**

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Insert rationale here

National Grid does not anticipate P238 having an impact on system operation.

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## Question 6:

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Will P238 impact your computer systems or processes?

### If so, how?

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**Please give your response: No**

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Insert rationale here

National Grid does not anticipate P238 having an impact on our computer systems or processes.

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**Question 7:**

Does P238 cause you any potential issues relating to security of supply?

**If so, what are these?**

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**Please give your response: No**

Insert details here

National Grid does not anticipate P238 having an impact on security of supply.

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**Question 8:**

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If P238 is implemented, will you:

- Incur any implementation/operational costs; or
- Achieve any ongoing operational cost savings and/or efficiency benefits?

**If yes, why is this?**

*Please give specific examples and cost details where possible.*

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**Please give your response: No**

Insert details here

National Grid does not believe it will incur costs associated with the implementation of P238.

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**Question 9:**

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The Group believes that:

- P238 will not require consequential changes to any Core Industry Documents and/or the System Operator-Transmission Owner Code; and
- Its solution is consistent with the Grid Code's requirements for Power Park Modules.

**Do you agree with the Group's view? Why is this?**

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**Please give your response: Yes**

Insert rationale here

National Grid agrees that P238 will not require consequential changes to other Core Industry Documents.

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**Question 10:**

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

**If yes, what are these?**

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**Please give your response: No**

Insert details here

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**Question 11:**

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Are there any impacts as a result of P238 on the requirements for operational metering that you would like the Group to consider?

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**Please give your response: No**

Insert comments here if applicable

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**Question 12:**

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Do you have any further comments on P238 that you would like the Group to consider?

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**Please give your response: No**

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Insert comments here if applicable

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## Further Information

To help us process your response, please:

- Email your completed response form to [modifications@elexon.co.uk](mailto:modifications@elexon.co.uk)
- Use the following text in the subject line of your email: "P238 Transmission Company Analysis"
- Include a phone number in your covering email, so that we can contact you if we have any questions
- Respond by **5pm** on **Tuesday 11 August 2009** (the Group may not be able to consider a late response)

The Modification Group will consider your response at its meeting on 14 August 2009, when it will make its final recommendation as to whether the change should be made. The Panel will consider this recommendation and the Group's full Assessment Report at its meeting on 10 September 2009. The Panel will then consult on its own recommendation to the Authority.