

P240 Consultation Responses

Consultation issued on 1 October 2009

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

We received responses from the following Parties

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
Centrica	10/0	Supplier / Generator / Trader
RWE Supply & Trading GmbH	10/0	Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributors / other
SAIC Ltd. (for and on behalf of ScottishPower)	7/0	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
E.ON UK	6/0	Supplier / Generator / Trader / Consolidator / Exemptable Generator
Greater Gabbard Offshore Winds Limited	1/0	Generator

Question 1: The Group believes P240 would better facilitate Applicable BSC Objectives (b) and (c). Do you agree?

Summary

Yes	No	Neutral/Other
5	0	0

Responses

Respondent	Response	Rationale
Centrica	Yes	Centrica supports P240 for the reasons provided by the Modification Report.
RWE Supply & Trading GmbH	Yes	We support implementation of P240 for the reasons set out in our modification proposal. We endorse the views of the modification group.

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Respondent	Response	Rationale
SAIC Ltd (for and on behalf of Scottish Power)	Yes	<p>We agree that the Proposed Modification would better benefit the BSC Objectives:</p> <p>Objective b) – we agree with the group’s view that making these PPMs available to the SO will most likely help ease the balancing and operational challenges that are faced by National Grid, reducing costs.</p> <p>Objective c) - we also agree with the group’s view that the inability to export the output from these PPMs during the six week registration period will have a detrimental impact on competition. Parties will have heavily invested in these generation units and if they are stopped from recouping their investment through contracting their volume, these costs will most likely have to be passed on through higher costs elsewhere. The Generator will be at a competitive disadvantage because of a purely BSC-related legal barrier.</p>
E.ON UK	Yes	E.ON agrees with the clear benefits under both Objectives (b) and (c) highlighted by the Group.
Greater Gabbard Offshore Winds Limited	Yes	-

Question 2: The Group believe switching should be restricted to Power Park Modules only to remain consistent with the Grid Code. Do you agree?

Summary

Yes	No	Neutral/Other
5	0	0

Responses

Respondent	Response	Rationale
Centrica	Yes	It is essential that there is consistency between the Grid Code and the BSC.
RWE Supply & Trading GmbH	Yes	The Grid Code definition is an appropriate way of determining the eligibility for plant and apparatus to switch between BM units.
SAIC Ltd (for and on behalf of Scottish Power)	Yes	The Grid Code provisions only apply to PPMs, and therefore the BSC provisions (as the subsidiary Code) should only apply to PPMs.

Respondent	Response	Rationale
E.ON UK	Yes	The defect identified is limited to the configuration of Power Park Units and maintaining consistency with Grid Code provisions for PPU/PPM switching by enabling movement of PPU/PPM between PPM/BMU should be satisfactory.
Greater Gabbard Offshore Winds Limited	Yes	-

Question 3: The Group believe P240 should only apply to BM Units of the same Lead Party. Do you agree with this conclusion?

Summary

Yes	No	Neutral/Other
5	0	0

Responses

Respondent	Response	Rationale
Centrica	Yes	This modification solution should not seek to be a means for transferring power between Lead Parties.
RWE Supply & Trading GmbH	Yes	It is appropriate that the switching arrangements apply exclusively to BM Units of the same lead party since this party is responsible for the configuration of the relevant BM units.
SAIC Ltd (for and on behalf of Scottish Power)	Yes	The switching of plant between BMUs belonging to different Parties would lead to a much messier (mis)allocation of volume than restricting it to BMUs belonging to the same Lead Party. With restriction to the same Party, affected volume should remain within the same Account, minimising the financial impact on these Parties.
E.ON UK	Yes	Hopefully for cases where a project is a Joint Venture thus the JV the Lead Party, this might be fairly straightforward. If more complex shared ownership scenarios arise it should still be manageable through bilateral agreement(s) between the Parties concerned. Supporting Objective (d).
Greater Gabbard Offshore Winds Limited	Yes	-

Question 4: Do you support the implementation date to be 5 WDs after the Authority's decision?

Summary

Yes	No	Neutral/Other
5	0	0

Responses

Respondent	Response	Rationale
Centrica	Yes	This would be consistent with implementation prior to Go Live.
RWE Supply & Trading GmbH	Yes	This appears to be a practical implementation timescale.
SAIC Ltd (for and on behalf of Scottish Power)	Yes	As the anticipated solution is manual and procedural in nature a short implementation window is appropriate.
E.ON UK	Yes	Registration and operational procedures should be fully clarified as soon as possible to minimise uncertainty and consequent costs to developers and generators, so facilitating development of further low carbon/renewable intermittent generation.
Greater Gabbard Offshore Winds Limited	Yes	-

Question 5: Are you aware of any Power Park Module configuration that would require multiple aggregation rules to be held by the CDCA?

Summary

Yes	No	Neutral/Other
3	1	1

Responses

Respondent	Response	Rationale
Centrica	-	-
RWE Supply & Trading GmbH	Yes	We are not aware of any existing power park module configurations that would require multiple aggregation rules to be held by the CDCA. However, we are aware of at least one offshore power station where these

Respondent	Response	Rationale
		arrangements would be appropriate.
SAIC Ltd (for and on behalf of Scottish Power)	No	-
E.ON UK	Yes	e.g. the Offshore PPM development, London Array.
Greater Gabbard Offshore Winds Limited	Yes	The way that GGOWL is configured offshore there is the normal and abnormal running arrangements. It will be necessary to provide several arrangements then indicate which one GGOWL would move to during a maintenance or repair period.

Question 6: Do you agree that P240 provides additional benefit when combined with P237/P238?

Summary

Yes	No	Neutral/Other
5	0	0

Responses

Respondent	Response	Rationale
Centrica	Yes	The greatest efficiency gains can be achieved from the implementation of all three modifications. Due to their interaction (as described in the P237 Assessment Report), the benefits of the 3 modifications in combination exceed the sum of the benefits of each modification on its own.
RWE Supply & Trading GmbH	Yes	The proposal would increase the flexibility of arrangements for the configuration of offshore power stations.
SAIC Ltd (for and on behalf of Scottish Power)	Yes	The example configurations provided in the Assessment Consultation show that only one of the three configurations would require a change to the aggregation rules. By allowing a reduction in the number of BMUs associated with an offshore platform, these Modifications would reduce the number of occurrences of metering configuration where there would need to be a change of aggregation rules to facilitate switching of plant. As this is a manual change there would be extra effort expended in changing these rules, and ensuring they are applied correctly.
E.ON UK	Yes	All aim to enable efficiency in construction and operation of intermittent generation developments, minimising costs and optimising utilisation of such assets.

Respondent	Response	Rationale
Greater Gabbard Offshore Winds Limited	Yes	-

Question 7: Are there alternative solutions that the Modification Group has not identified, that they should consider?

Summary

Yes	No	Neutral/Other
0	5	0

Responses

Respondent	Response	Rationale
Centrica	No	-
RWE Supply & Trading GmbH	No	-
SAIC Ltd (for and on behalf of Scottish Power)	No	-
E.ON UK	No	-
Greater Gabbard Offshore Winds Limited	No	-

Question 8: Do you have any further comments on P240?

Summary

Yes	No	Neutral/Other
0	5	0

Responses

Respondent	Response	Rationale
Centrica	No	-
RWE Supply & Trading GmbH	No	-
SAIC Ltd (for and on behalf	No	-

Respondent	Response	Rationale
of Scottish Power)		
E.ON UK	No	-
Greater Gabbard Offshore Winds Limited	No	-