

P241 Consultation Responses

Consultation issued on 29 September 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
SAIC Ltd. (for and on behalf of ScottishPower)	7/0	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
E.ON UK plc	5/0	Supplier, Generator, Trader, Consolidator, Exemptible Generator
International Power	6/0	Trader/Generator
RWE Supply & Trading GmbH	10/0	Supplier/Generator/ Trader / Consolidator / Exemptible Generator / BSC Agent / Party Agent / Distributors
Centrica	10/0	Supplier / Generator / Trader

Question 1: The Group believes that implementation of P241 would better facilitate Applicable BSC Objectives c) and d). Do you agree?

Summary

Yes	No	Neutral/Other
5	0	0

Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	Yes	We agree with the group's views against the applicable Objectives: Objective c) - the installation of additional non-settlement metering at considerable cost would put that class of Generator at a competitive disadvantage over other classes.

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Respondent	Response	Rationale
		Objective d) - similarly, the administration of these additional (and unnecessary) meters and their data adds to the operating costs of the BSC and their Agents.
E.ON UK plc	Yes	The effect on competition c) shouldn't be overstated. Presumably a new entrant would only be required to follow accepted practice even with the existing wording. What P241 does do is clarify the ambiguity between accepted practice and the Code which better meets the efficiency objective d).
International Power	Yes	We agree with the Group that P241 would better facilitate Applicable BSC Objectives c): the requirement to fit and maintain unnecessary separate metering of CCGT's is an obstacle to market participation and the removal of this requirement would promote effective competition.
RWE Supply & Trading GmbH	Yes	We support implementation of P241 for the reasons set out in our modification proposal. We endorse the views of the modification group.
Centrica	Yes	Centrica supports the unanimous views of the modification group as set out in the report.

Question 2: Do you support the implementation approach described in the consultation document?

Summary

Yes	No	Neutral/Other
5	0	0

Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	Yes	The change will in effect align the BSC to the current practice for CCGTs – as it is a legal change to the Code, and should have no associated central or Party system changes, it should be implemented as soon as practically possible.
E.ON UK plc	Yes	There is no need for a long lead time for this amendment as it represents a simple change to the Code and doesn't change any systems/working practices.
International Power	Yes	-
RWE Supply &	Yes	This appears to be a practical implementation

Respondent	Response	Rationale
Trading GmbH		timescale.
Centrica	Yes	-

Question 3: 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
SAIC Ltd. (for and on behalf of ScottishPower)	No	-
E.ON UK plc	No	-
International Power	No	-
RWE Supply & Trading GmbH	No	-
Centrica	No	-

Question 4: Do you agree with the P241 Group that P241 should specifically exclude CCGTs, or do you think a broader ability to exclude non-standard BM Units should also be introduced?

If you believe there should be broader exclusion from the separate metering requirement, please provide examples of generating Unit types and/or non-standard BM Unit configurations suitable for exclusion.

Summary

Yes	No	Neutral/Other
2	-	3

Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of	Yes	The Modification is quite specific in targeting CCGTs only. We cannot speculate on what new types of generator type may or may not come to market in the

Respondent	Response	Rationale
ScottishPower)		future. If a new generator type emerged in the future which could claim to meet the same criteria for exclusion (i.e. can be treated as a single BMU) then a Modification could be raised at the time.
E.ON UK plc	Yes	Other issues can be addressed on a case by case basis.
International Power	-	We are not aware of any other relevant examples of generating Unit types or configurations that would also require exclusion. We are therefore content that P241 addresses the defect by specifically excluding CCGT Modules, rather than employing a broader exclusion
RWE Supply & Trading GmbH	Specifically CCGTs	We are not aware of any non-standard BM Units (or standard BM Units other than CCGT modules) which currently would fall into the scope of P241. If new plant were to be constructed that would be appropriately excluded were the BSC so written, there would be time to apply for a BSC change, or if the currently required metering was to be installed, the cost difference for new build would be relatively small.
Centrica	-	-

Question 5: The Group has quantified the impact of installing metering on CCGT Generating Units.

Can you provide any further information on the cost of installing meters on new or existing CCGTs? (i.e. if P241 is not approved and additional Metering is required) For example, further details of the identified costs, or details of any required activities/equipment not identified so far.

Summary

Yes	No	Neutral/Other
0	3	2

Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	No	-
E.ON UK plc	No	-
International Power	-	We agree with the indicative cost estimates provided by Group members. These concur with estimates I have been given by Deeside Power Ltd. The big issue would be the absence of CoP1 metering standard 400 kV CT's and VT's on the individual generators. In

Respondent	Response	Rationale
		addition to the costs and issues provided in the consultation, we would expect additional peripheral costs at Deeside for replacement and re-location of the Kenda outstations and replacement of the obsolete data collection software, though these would not be of the same order as the costs against the CT & VT issue.
RWE Supply & Trading GmbH	No	-
Centrica	-	The costs quantified in the assessment report indicate that there would be substantial costs to install the additional metering despite there being no benefit to the Party, System Operator, Settlements or market as a whole from doing so.

Question 6: Do you have any further comments on P241?

Summary

Yes	No	Neutral/Other
0	5	0

Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	No	-
E.ON UK plc	No	-
International Power	No	-
RWE Supply & Trading GmbH	No	-
Centrica	No	-