Stage 03: Assessment Report

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

P243: Generator Forward Availability by Fuel type

P243 aims to produce a more detailed forecast of Generator availability, by publishing Output Usable data broken down by 'fuel types' on the Balancing Mechanism Reporting System (BMRS).

Modification Group recommends **Approval** of Alternative Modification

Modification Group recommends **Rejection** of the Proposed Modification

Impacts:
Generators, Transmission Company, the BMRA and BMRS Users

Contents

About this document:

This document is an Assessment Report, which ELEXON will present to the Panel on 12 November 2009, on behalf of the P243 Modification Group. The Panel will consider the recommendations on the final page, and agree an initial view on whether or not this change should be made.

There are 2 parts to this document. This is Part 1. It provides details of the solution, impacts, costs, benefits and the implementation approach associated with this change. Part 2 (attachment A) sets out the impacts and the development of the Proposed and Alternative Modifications.

Any questions?

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1 Summary

Why Change?

Output Usable data is currently available on both the BSC and National Grid websites. However, this data is not broken down by fuel type. P243 aims to make this data available by fuel type in one central location.

Proposed Solution

The Proposed solution consists of:

- Publishing nationally aggregated Output Usable data broken down in the same fuel type categories as Out-turn data on the BMRS for the 2-14 days and 2-52 weeks ahead time periods;
- Publishing Output Usable data for Interconnectors. Currently forward availability for Interconnectors is not provided to National Grid (under the Grid Code) but it is expected that this data will become available to National Grid and the wider industry in the near future. In the interim, the BMRS will report the forward availability for each Interconnector fuel type set as zero/not available;
- Transferring all Output Usable data/Generating Plant Demand Margin data from the BSC website to the BMRS.

Please refer to section 3 of this document for further details.

Alternative Solution

The Modification Group have developed an Alternative solution which is largely identical to the Proposed Modification. In addition to publishing the information under the Proposed Modification, the Alternative Modification will also publish Output Usable data broken down by BM Unit on the BMRS.

Please refer to section 4 of this document for further details.

Impacts & Costs

The intention of the P243 solution is not to place any further obligations on BSC Parties. As such this solution will not require the submission of new information. National Grid will be required to aggregate existing Generator availability data and for the BMRS to publish this new data feed.

Respondents to the P243 consultation have indicated that they would need to amend their systems (under both the Proposed and Alternative Modifications) to collect the P243 information. One respondent estimated that it would take approximately 3 months and a cost of £26,000 to make the required changes to receive the data published under P243.

The estimated standalone implementation cost for the Proposed and Alternative Modifications are approximately £312,000 and £376,000 respectively.

Please refer to section 5 of this document for further details.

Implementation

The Modification Group recommend an implementation approach of:

- 05 November 2010 if an Authority decision is received on or before 28 January 2010, or
- 23 February 2011 if the Authority decision is received after 28 January 2010 but on or before 30 March 2010;

The Group note that another Modification P244, which also seeks to publish data on the BMRS, is being progressed to identical timescales and there would be cost savings in progressing and implementing these modifications together. With this in mind, the Group's preference is that P243 be included with P244 in the November 2010 BSC release, so as to realise the benefits of these modifications as soon as possible.

Please refer to section 6 of this document for further details.

The Case for Change

The majority of the Modification Group believe that P243 (Proposed or Alternative) will improve the quality of information on likely availability of generation capacity and increase competition between market participants in this area.

However, some Group member's believed that the increase of information published may result in informational overload for smaller/ independent Parties and would not translate to efficient market decisions being taken. Additionally some members believed that the implementation costs outweighed any benefits of the Modification.

The Group also debated whether there were discriminatory issues under P243; some Group members believed that there were, while others believed there were no such issues.

Please refer to section 7 of this document for further details.

Recommendations

The majority of the Modification Group have recommended that the Alternative Modification should be **APPROVED**.

2 Why Change?

Data on the BMRS and BSC website

The Balancing Mechanism Reporting Service (BMRS) is a website that provides current and historic data on the electricity market, such as Imbalance prices, forecasted Demand and system prices.

Currently, the BMRS provides near real-time information for Out-turn data. Out-turn data is a measure of the actual generation exported onto the Transmission System and is collected in real time via National Grid's operational metering. The data is reported at both national and BM Unit level, and is also broken down to show Generation by fuel type. At present, there are 11 'fuel type categories', including the major fuel types:

- Oil;
- Coal;
- Wind;
- Nuclear; and
- Gas.

National Grid also publishes Output Usable data via the BSC website. Output Usable data is the forecast of the maximum level at which a Generator can export to the Transmission System (Generator availability) and is based on information submitted by Generators in compliance with Grid Code obligations OC2. The Output Usable data is published for the following periods:

- 2-14 days ahead;
- 2-49 days ahead[1];
- 2-52 weeks ahead;
- 1-2 years ahead; and
- 3-5 years ahead.

The issue

Both Out-turn and Output Usable data include data on the whole of the national electricity Transmission System, known as 'national' data.

However, unlike Out-turn data, Output Usable data is not broken down by fuel type, is not published on the BMRS and is not published on a BM Unit basis. Therefore, while users can see a detailed breakdown for Generation Out-turn, they cannot see a comparable detailed breakdown for Output Usable data. This means that:

- Detailed comparisons between the Output Usable and Out-turn data cannot be made. Only high level comparisons are possible;
- The future availability of a plant cannot be viewed; and
- Strategic decisions with respect to generation cannot be made.

The issue of publishing Output Usable data by fuel type was previously discussed under Issue 17 'Review of Electricity Market Information' in 2005. Although the Issue Group believed that a Modification should be raised to consider this issue further, no such Modification has been raised until now.

The BMRS

The BMRS can be accessed at: www.bmreports.com

11 fuel type categories

- Oil;
- Coal;
- Wind;
- Nuclear;
- Gas;
- French Interconnector;
- Irish Interconnector;
- Pumped Storage;
- Hydro;
- OCGT; and
- CCGT.

[1] In practice, data is not provided for this timescale. The P243 solution is flexible to accommodate data for this timescale, if it was made available in the future.

3 Solution

This section summarises the Proposed and Alternative Modifications. Details of the Proposed and Alternative Modifications can be found in section 3 – 4 of the detailed assessment whereas details on how the Group developed the solutions can be found in sections 5 – 6 of the detailed assessment.

P243 Proposed Solution

The solution developed by the Modification Group can be split into the following three parts:

- **Publishing nationally aggregated Output Usable data by fuel type on the BMRS**. Output Usable data will be published in the same fuel type categories used for Out-turn data for the '2-14' days and '2-52' weeks ahead periods;

- **Publishing Output Usable data for Interconnectors**. Although Interconnectors do not submit Output Usable data to National Grid, the Group agreed that the Proposed Modification Legal text should be flexible enough to allow for this to be published on the BMRS once this data becomes available in the future. This would also mean that until such data is available, the BMRS will report the forward availability for each Interconnector fuel type as zero/not available; and

- **Transferring Output Usable/Generating Plant Demand margin data from the BSC website to the BMRS.** The Group agreed that it would be inefficient and confusing to have Output Usable data in different locations (BMRS/BSC website). Therefore the national Output Usable data, zonal Output Usable data and Generating Plant Demand margin data currently published on the BSC website will be transferred onto the BMRS.

Are there new BSC Obligations?

The intention of the P243 solution is not to place any further obligations on BSC Parties. As such this solution will not require the submission of new information. It only aims to introduce a new way of aggregating current Generator availability data already supplied by BSC Parties to National Grid.

4 Alternative Solution

The Alternative Modification is largely identical to the Proposed Modification. However, **in addition** to publishing the information described in section 3 above, the Alternative Modification will also publish on the BMRS **Output Usable data broken down by BM Unit for the '2-14' days ahead and '2-52' weeks ahead time points**.

The Group suggested an Alternative Modification as some members were concerned that the publication of aggregated Output Usable data by fuel type introduced the potential for discrimination in fuel types with a low number of Generators. As the publication of such data would be publicly available on the BMRS, it may enable other Parties to work out a Generator's Outage periods and trading position, which would be less visible if a fuel type has several Generators.

Some Group members believed that the Alternative Modification transferred the issue of discrimination onto independent Generators, where the Outage plans/trading positions could be revealed; as these Generators have a low number of BM Units, the forward availability may be strongly correlated to their Output. However, there were those Group members that believed that there was no discrimination under the Alternative Modification as all Generators were treated equally.

Not all Group members believed discrimination existed under the Proposed/Alternative Modifications as a Generator may have hedged any planned Outages and so publishing the Output Usable data would not necessarily reveal their market position and lead to discrimination.

Further details of this Alternative solution and the Group's rationale for suggesting this can be found in sections 4 and 6 of the P243 detailed assessment.

As indicated previously, like the Proposed Modification, the Alternative would not place any new Obligations on BSC Parties that submit data through the Grid Code.

5 Impacts & Costs

The majority of impacts of P243 are on National Grid, the BMRA and ELEXON. Respondents to the P243 consultation have indicated that their systems would require amendment in order to obtain the P243 data. At a high level, the identified impacts are:

- Changes are required to National Grid's IT systems in order to aggregate and submit the P243 data to the BMRS;
- Changes are required to the BMRA in order to receive and display the P243 data to both high grade and low grade service users.
- BMRS users may require changes to the TIBCO messaging service in order to receive the P243 data;
- BMRS users may require configuration changes to their IT systems to obtain the Output Usable and Generating Plant Demand Margin data, which will be transferred from the BSC website to the BMRS; and
- BSCCo will implement changes to the Code (sections Q and V). Changes would also be required to the various Code Subsidiary documents.

For more detail on the P243 impacts, please refer to section 9 of the P243 detailed assessment.

Costs for implementing P243

The implementation costs for the Proposed and Alternative Modifications are shown in the table below:

Table 1: Implementation costs for P243 in a standard BSC Systems release.

Solution	Costs
P243 Proposed Modification	National Grid: £170k BSC Agent: £134.2k BSCCo: £8.2k (37 man days) **Total: £312.4k**
P243 Alternative Modification	National Grid: £230k BSC Agent: £137.7k BSCCo: £8.2k (37 man days) **Total: £375.9k**

The BMRA cost can be split into two areas. The Application Management and Development (AMD) (the aspect of the BMRA service that is involved in developing the solution for the BMRS system) and Business Process Outsourcing (BPO) (which is responsible for the day to day running of the BMRA). ELEXON expects a new AMD contract in early 2010. Therefore, the overall BSC agent costs provided here are less accurate than normal. If P243 were approved, we would need to revisit these costs. We believe that the costs shown here have been a reasonable estimate to use to assess and consult on P243.

6 Implementation

Implementation approach

The Group have requested that P243 be implemented in the earliest possible BSC Systems Release to realise the benefits of the Modification sooner. The Implementation lead time for P243 is largely driven by National Grid's development timescales (approximately 9 months), with a further month required by ELEXON/BMRA to complete any appropriate testing to ensure the communication between the National Grid and BMRA systems is working. With this in mind, the Group recommend implementation on:

- 05 November 2010 if the Authority approves P243 on or before 28 January 2010; or
- 23 February 2011 if the Authority approves P243 on or before 30 May 2010.

Interaction with P244

P244 'Provision of BritNed flow data to the BMRS' aims to include data relating to the Netherlands-England Interconnector (BritNed) on the BMRS once the Interconnector becomes operational in late 2010.

The Group note that P243 and P244 assessment procedures are being progressed to identical timescales and recommend implementing these Modifications together in a standard BSC release as there are cost savings in doing so.

Both Modifications (P243 and P244) could be implemented alone, if the Authority were to reject one of the two Modifications or if it was recommended that P243 and P244 should be implemented separately. However, a more efficient route would be to implement both Modifications together and included them as part of a standard BSC Systems release. **Please note** that there is approximately an overall **19% cost saving** in implementing P243 and P244 together, as opposed to implementing these Modifications separately.

7 The Case for Change

This section summarises the Group's discussions and details the Group's views against the Applicable BSC Objectives.

Group's discussions

The main areas that the Modification Group discussed were:

- **Whether publication of Output Usable data was discriminatory to Generators:** Some Group member's believed that there was discrimination under the Proposed and Alternative Modification. Under the Proposed Modification, it was believed that there may be discrimination in fuel types with a low number of Generators. This may enable other Parties to work out a Generator's Outage periods and trading position, which would be less visible if a fuel type has several Generators. Some Group members believed that the Alternative Modification transferred the issue of discrimination from certain Generators to independent Generators where the forward availability is strongly correlated to a Generator's Outage programme/trading position and may put such Generators at a disadvantage. However, there were those Group members who believed that there was no discrimination/ that any discrimination was immaterial;

- **Implementation costs:** The majority of Group members believed that the implementation costs for P243 were high in relation to what the Modification aimed to publish. Some Group members noted that the costs for P243 are significantly lower than other 'BMRA reporting Modifications'.

- **Gaming:** The Group had concerns that the publication of Output Usable data may increase gaming in the market and have a negative impact on the operation of the national Transmission System. However, the Group concluded that the increased granularity of information would mean that such behaviours would be easily spotted and that this would act as a deterrent.

Details of the Group's discussions can be found in Section 7 of the detailed assessment.

Views against BSC Objectives

The benefits and drawbacks for P243 have been tied to the Applicable BSC Objectives. The majority view of the Group was that both the Proposed Modification and Alternative Modification **WOULD** better facilitate the achievement of the Applicable BSC Objectives (b) and (c) when compared with the existing level of data publication under the Code.

The majority of the Group believed that P243 would facilitate a marginal improvement to BSC Objective (b) and allow for a more efficient operation of the national Transmission System as:

- Generator's would be able to co-ordinate their Outage plans;
- Market participants might take more efficient and economical decisions on the future electricity market; and
- The Alternative Modification would enable the Scottish Transmission Owners to better align their Outages with Generators.

However, some members of the Group had concerns that the data may be used by Parties to 'game' in the market. The Group also noted that if a Party did 'game', such behaviours would be easily identifiable and would be in breach of a Generator's Licence.

With respect to BSC Objective (c), the majority of the Group believed that the provision of transparent and easily accessible information would:

- Create a level playing field for all market participants;
- Provide market participants with a better view of the future electricity markets; and
- Improve 'price discovery' where the likely prices in the future electricity market are a better reflection of what the Transmission System will be like, rather than speculation.

The majority of the Group believed that P243 did not better facilitate BSC Objective (d) due to the high implementation costs where:

- A majority of the Group believed that any benefits under BSC Objective (d) were outweighed by the high implementation costs; and
- A minority of the Group believed that the implementation costs for P243 outweighed the benefits of the Modification.

The tables below highlight the views made by the Group for each BSC Objective for:

- Proposed Modification;
- Alternative Modification; and
- Alternative Modification vs. Proposed Modification.

What are the Applicable BSC Objectives?

(a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence

(b) The efficient, economic and co-ordinated operation of the national Transmission System

(c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity

(d) Promoting efficiency in the implementation of the balancing and settlement arrangements

Proposed Modification (vs. current arrangements)

Applicable BSC Objective (b)

Table 2: Comparison between the Proposed Modification and current arrangements

For	Against
– Generators of different fuel types should be able to coordinate Outage periods (on an aggregate level) and in turn Outages would be spread thereby enabling the Transmission Company to operate the Transmission System efficiently. – Market participants can make better informed decisions on market prices. The transparency of data will enable a true reflection of market electricity prices rather than expected market prices. If participants take more economical/efficient decisions, this should in turn help the Transmission Company in the efficient and economic operation of the Transmission System.	– If Parties game such that Output Usable is not an accurate indicator of their planned capability, then this would make it difficult for the Transmission Company to operate the national Transmission System efficiently and economically.

Applicable BSC Objective (c)

Table 3: Comparison between Proposed Modification and current arrangements

For	Against
– Increased transparency allows market participants to have a better view of market conditions and make better informed decisions and is seen to increase competition. – Transparent and easily accessible data makes the national electricity market more attractive to new market participants. As the data is available to all market participants, it enables new/small market participants (who have limited resources for forecasting Generator forward availability) to compete on a level footing with larger established participants. Established market participants have the resources/experience to forecast Generator forward availability which smaller/new market participants may not. – The improved transparency of data will enable market participants will see that market prices are a better reflection of the state of the Transmission System, rather than speculation. This will lead market participants to take more efficient and economic decisions and in turn is believed to improve market liquidity. For example, market participants can have a better view of the fuel switching potential (the likelihood that some Generators or a large number of Generators switch from one fuel type to another) and what the likely market prices would be as a result.	– Potential discrimination in fuel types with a low number of Generators. This may enable other Parties to work out a Generator's Outage periods and trading position, which would be less visible if a fuel type has several Generators.

Applicable BSC Objective (d)

The majority of the Group believed that the Proposed Modification did not better facilitate BSC Objective (d).

Table 4: Comparison between Proposed Modification and current arrangements

For	Against
– Moving all existing Output Usable/Generating Plant Demand margin from the BSC website to the BMRS increases the efficiency of the BSC arrangements as all the data would exist in one central place as opposed to maintaining the same data in multiple places. This would reduce confusion for market participants in having data duplicated over multiple websites.	– High implementation costs for P243 outweighs the benefits achieved under BSC Objective (d). Some Group members believed that these costs also outweighed the benefits achieved under BSC Objectives (b) and (c).

Alternative Modification (vs. current arrangements)

As there are views common to both the Proposed and Alternative Modification (when individually compared to the baseline), views that are specific to the Alternative Modification have been highlighted in **purple**.

Applicable BSC Objective (b)

Table 5: Comparison between the Alternative Modification and current arrangements

For	Against
– Generators of different fuel types should be able to coordinate Outage periods and in turn Outages would be spread thereby enabling the Transmission Company to operate the Transmission System efficiently. – Market participants can make better informed decisions on market prices. The transparency of data will enable a true reflection of market electricity prices rather than expected market prices. If participants take more economical/efficient decisions, this should in turn help the Transmission Company in the efficient and economic operation of the Transmission System. – Publication of forward availability at BM Unit level could help Scottish Transmission Owners to better align their outages with generator outages,	– Transparency of data could increase the risk of gaming; Parties are able to see Outages and change their operational plans. This in turn could reduce the validity of the published Output Usable data. However, if a Generator knowingly behaved in such a manner, it would be in breach of it's Generators Licence. – There is a risk that some Generators maybe subject to a competition inquiry for no fault of its own (i.e. its planned Outage period has coincided with another Generator's planned/unplanned Outage in the same geographical area). – If Parties game such that Output Usable is not an accurate indicator of their planned capability, then this would make it difficult for the Transmission Company to operate the national

which may help alleviate Scottish constraints thus facilitating the economic and efficient operation of national electricity transmission system.	Transmission System efficiently and economically.

Applicable BSC Objective (c)

Table 5: Comparison between the Alternative Modification and current arrangements

For	Against
– Increased transparency allows market participants to have a better view of market conditions and make better informed decisions and is seen to increase competition. – Transparent and easily accessible data makes the national electricity market more attractive to new market participants. As the data is available to all market participants, it enables new/small market participants (who have limited resources for forecasting Generator forward availability) to compete on a level footing with larger established participants. Established market participants have the resources/experience to forecast Generator forward availability which smaller/new market participants may not. – The improved transparency of data may result in market prices that are a better reflection of the state of the Transmission System, rather than speculation. This might lead market participants to take more efficient and economic decisions and in turn is believed to improve market liquidity. For example, market participants can have a better view of the fuel switching potential (the likelihood that some Generators or a large number of Generators switch from one fuel type to another) and what the likely market prices would be as a result.	– Parties may not use the data in a correct manner and use the data to 'game'. – Parties may place undue emphasis and resources in analysing the increased resolution of the Output Usable data that is of unknown accuracy and subject to change.

Applicable BSC Objective (d)

The majority of the Group believed that P243 Alternative Modification (like the Proposed Modification) did not better facilitate BSC Objective (d).

Table 6: Comparison between Proposed Modification and current arrangements

For	Against
– Moving all existing Output Usable/Generating Plant Demand margin from the BSC website to the BMRS increases the efficiency of the BSC arrangements as all the data would exist in one central place as opposed to maintaining the same data in multiple places. This would reduce confusion for market participants in having data duplicated over multiple websites.	– High implementation costs for P243 outweighs the benefits achieved under BSC Objective (d). Some Group members believed that these costs also outweighed the benefits achieved under BSC Objectives (b) and (c).

Alternative Modification vs. the Proposed Modification

Applicable BSC Objective (b)

The majority of the Modification Group believed that the Alternative Modification better facilitated BSC Objective (b) when compared to the Proposed Modification. The views of the Group 'for and against' the Alternative are noted below:

Table 7: Comparison between the Alternative Modification and Proposed Modification

For	Against
– Removes the disadvantage under the Proposed Modification of Generators in certain fuel types having their market positions revealed and others not having their market positions revealed. – Increases the transparency of market information for which is visible for all market participants – The Alternative Modification will help alleviate the Scottish transmission owners to more efficiently manage their Outages, in turn increasing the efficiency of the operation of the national transmission system.	– May disadvantage independent Generators as their forward availability is strongly correlated to their Output – The increase of data under the Alternative Modification does not translate as an increase in market information and efficient decisions –

Applicable BSC Objective (c)

The majority of the Modification Group believed that the Alternative Modification better facilitated BSC Objective (c) when compared to the Proposed Modification. The views of the Group 'for and against' the Alternative are noted below:

Table 8: Comparison between the Alternative Modification and Proposed Modification

For	Against
– Provides independent market participants with the same market information that the larger market players have access to. – As all market participants are treated in the same manner, without information asymmetry (discrimination) that would exist under the Proposed Modification. – The more granular provision of forward availability under the Alternative could facilitate the BSC Objectives better than the Proposed Modification.	– The increase of information published may result in informational overload for smaller/ independent Parties and would not translate to efficient market decisions being taken. – While there is a preference for transparency the possible alternative would have the potential to expose the position of an independent/smaller generator disproportionately to that of the larger portfolio players. – The Alternative solution may result in Parties placing undue emphasis on the data that is provided

Applicable BSC Objective (d)

As indicated previously, the majority of the Group believed that P243 (Proposed and Alternative) did not better facilitate BSC Objective (d). The arguments 'for and against' are identical for those listed in table 6.

Cost Benefit Analysis

The Modification Group has found it extremely difficult to quantify the benefits of increased data transparency. As a result, the Group consulted with industry, on whether there were quantifiable benefits to their organisations.

Like the Modification Group, the consultation respondents also found it difficult to quantify the benefits of increased transparency but did provide qualitative views which can be found in section 8.

The Group has also noted that Ofgem found it difficult to quantify the benefits of increased transparency during its investigation into the 'Liquidity in the GB wholesale energy market'.

8 Industry Views

This section summarises the views expressed by respondents received during the P243 consultation. The Group's initial views were issued for an industry impact assessment/ consultation on 02 October 2009.

Eleven responses were received where:

- No new arguments were made;
- The majority of respondents believed that both the Proposed and Alternative Modification better facilitated the BSC Objectives when compared to the current arrangements;
- The majority of respondents preferred the Alternative Modification when compared to the Proposed Modification; and
- An overall majority of respondents believed that there are discriminatory issues under the Proposed or Alternative Modification. Those that believed that there were issues, noted that the Proposed Modification revealed the Outage plans/trading positions of certain Generators and not others and that the Alternative exposed the Outage plans and trading positions of independent Generators which may put them at a disadvantage as their forward availability is strongly correlated to their Output.

Details of the consultation responses can be found in section 8 of the detailed assessment whereas copies of the P243 consultation responses can be found on the P243 page.

9 Recommendations

Based on the discussion above, the P243 Modification Group invites the Panel to:

- AGREE an initial recommendation that Proposed Modification P243 should not be made;
- AGREE an initial recommendation that Alternative Modification P243 should be made;
- AGREE an initial Implementation Date for Proposed/ Alternative Modification P243 of
  - 05 November 2010 if an Authority decision is received on or before 28 January 2010, or
  - 23 February 2011 if the Authority decision is received after 28 January 2010 but on or before 30 March 2010;
- NOTE the draft legal text for Proposed Modification P243;
- NOTE the draft legal text for Alternative Modification P243;
- AGREE that Modification Proposal P243 be submitted to the Report Phase; and
- AGREE that ELEXON should issue P243 draft Modification Report for consultation and submit results to the Panel to consider at its meeting on 10 December 2009.

10 Further Information

More information is available in

Attachment **A**: Detailed Assessment

This information includes:

- Modification Group development of the Proposed and Alternative solutions
- Modification Group discussions
- Impacts
- Modification Group membership
- Process followed for P243

Attachment **B**: Legal Text Proposed and Alternative

All P243 documentation, including the **P243 consultation responses** are available at the P243 page of the ELEXON website.