

**Responses to CPC00585 – Impact Assessment of P204 'Scaled Zonal Transmission Losses'**

<b>Respondent</b>	<b>Organisation</b>	<b>Q1. Would Proposed Modification P204, as outlined in the attached Requirements Specification, have any additional impact on your organisation compared with Proposed Modification P198</b>	<b>Q2. If yes, please provide a description of the additional impact, any additional costs which would be incurred,<sup>1</sup> and any additional required development timescales (with supporting rationale)</b>	<b>Q3. Any other comments</b>
Sue Edwards	Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd	Yes	Confidential information removed	No
Dave Morton	EDF Energy (Supplier Response)	-	-	If options 1a or 1c are selected then we believe that costs and lead times will not be discernibly different to that of P198. All other options will require further time to provide an assessment of costs and timescales. If this is seen as a critical requirement for determining progress on this issue then we feel that further time must be given so that these options can be fully assessed.
Alastair Barnsley	E.ON UK Energy Services Limited	No	-	-

<sup>1</sup> Parties are invited to provide cost information to support their impact assessments. Where requested this information can be treated as confidential, although all information will be provided to the Authority. Respondents should therefore clearly indicate if any aspect of their response is confidential.

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Gary Henderson	Scottish Power UK plc ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	Yes. There will be additional impacts to incorporate the new scaling Factors	The additional changes, while having an impact on the overall system solution, will be incorporated within the changes required for P198. They will therefore have a negligible impact on the overall implementation timescales. Likewise, there will be no marked increase in associated costs	ScottishPower would also highlight that the notice required for implementation should be from the date of <b>definitive decision</b> for implementation (i.e. after all the appeals if applicable), as P82 experience showed that unnecessary costs were expended by the industry as a result of that process.
Louise Allport	British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, Eggborough Power Ltd, British Energy Direct Ltd, British Energy Generation (UK) Ltd	-	-	Options 1a/1c with single annual/seasonal scaling factor determined in advance: Impact as for P198/203.  Options 1b/1d with separate delivery/offtake annual/seasonal scaling factor determined in advance: Additional impact would be changes to internal processes for estimating, monitoring and pricing transmission losses. Estimated additional cost over P198 approximately £100k, with 3-6 month leadtime.  Option 2 with separate

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				<p>delivery/offtake scaling factor determined for each settlement period after the event: Impact would be more significant (a) changes to interface with central systems (2) changes to internal processes for estimating, monitoring and pricing transmission losses. Estimated additional cost approximately £200k above P198, with 6 month lead time.</p> <p>These additional costs are estimates based on outline descriptions of required changes. More formal impact assessment would follow any approval of the proposals for implementation.</p>