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P200 TRANSMISSION COMPANY ANALYSIS AND IMPACT ASSESSMENT - RESPONSE PRO-FORMA

In accordance with paragraph F2.8 of the Code, please respond to the following questions concerning Alternative Modification P200 (including the rationale for each response):

Q	Question	Response
1	Please outline any additional impact of Alternative Modification P200 (compared	We do not presently foresee any impact on our ability to discharge
	with Proposed Modification P200) on the ability of the Transmission Company to	our obligations under the Transmission Licence at this time.
	discharge its obligations efficiently under the Transmission Licence and on its	
	ability to operate an efficient, economical and co-ordinated Transmission	
	System.	
2	Please outline the views and rationale of the Transmission Company as to	We remain neutral as to whether the proposal better facilitates the
	whether Alternative Modification P200 would better facilitate achievement of the	Applicable BSC Objectives.
	Applicable BSC Objectives.	
3	Please outline any additional impact of Alternative Modification P200 (compared	We have not currently identified any additional impact of
	with Proposed Modification P200) on the computer systems and processes of the	Alternative Modification P200 compared with Proposed Modification
	Transmission Company, including details of any changes to such systems and	P200 (please refer to the Transmission Company Analysis and
	processes that would be required as a result of the implementation of the	Impact Assessment for P200 for further details).
_	Proposed Modification.	
4	Please outline any potential issues relating to the security of supply arising from	In the Transmission Company Analysis and Impact Assessment for
	the Alternative Modification.	P200 we noted that, in theory, the introduction of a zonal
		transmission losses scheme will provide a market signal for
		generation and demand to locate closer to each other, although
		given the long lead times commonly associated with transmission investment and the construction of new generation and demand
		plant, any affect to security of supply may not be seen for some
		years. However, in the wider context that investment decisions are
		taken in, and notwithstanding National Grid's wider obligations,
		transmission losses are in of themselves only one factor that will
		influence future investment decisions that may affect the
		configuration of the transmission network and in turn security of
		supply. In terms of short term despatch it is difficult to quantify
		whether transmission losses in of themselves will affect generation

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		availability and demand, given that transmission losses are only one factor against which generation plant availability and demand turn down will be assessed against. In terms of the potential Alternative Modification P200, this should have the same long term effects as P200, but may have different short term effects. However, given the difficulty of quantifying the impact of P200, it is equally difficult to quantify the amount by which such short term effects may differ.
5	Please provide an estimate of any additional development, capital and operating costs (broken down in reasonable detail) which the Transmission Company anticipates that it would incur in, and as a result of, implementing Alternative Modification P200 (compared with Proposed Modification P200).	We have not currently identified any additional development, capital and operating costs that would be incurred in, and as a result of, implementing the Alternative Modification P200 when compared with Proposed Modification P200 (please refer to the Transmission Company Analysis and Impact Assessment for P200 for further details).
6	Please provide details of any consequential changes to Core Industry Documents and/or the System Operator Transmission Owner Code that would be required as a result of the implementation of Alternative Modification P200.	We have not identified any changes that may be required to either the CUSC, Grid Code, or STC. We have not identified any changes to the Transmission Network Use of System and Balancing Services Use of System Charging Methodologies. It is worth noting that potential changes in European Legislation may affect the treatment of transmission losses across the interconnectors which could result in additional costs needing to be recovered for any losses payments made. This is however still in development and precise information cannot be provided on this at this time.
7	Any other comments on Alternative Modification P200.	

Please send your response by **12 noon** on **Friday 14 July 2006** to <u>modifications@elexon.co.uk</u>. Any queries regarding the analysis should be addressed to Justin Andrews on 020 7380 4364 or email address <u>justin.andrews@elexon.co.uk</u>.

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