

Modification Proposal – BSCP40/03	MP No: 349 <i>(mandatory by BSCCo)</i>
Title of Modification Proposal <i>(mandatory by originator):</i> Facilitating Embedded Generation Triad Avoidance Standstill	
Submission Date <i>(mandatory by originator):</i> 4 July 2017	
Description of Proposed Modification <i>(mandatory by originator)</i> <p>This Modification will introduce a requirement under the BSC for Suppliers that are the registrants of New Embedded Generators to tell their Half Hourly Data Aggregators (HHDAs) which Metering System IDs (MSIDs) relate to New Embedded Generation and that the HHDAs provide Period Metered Data from these MSIDs to National Grid in the most efficient and cost-effective process (similar to the requirement put in place for the Capacity Market (CM), in which HHDAs send data directly to EMRS).</p> <p>New Embedded Generators will be defined for the purpose of this Modification by CMP264. CMP264 currently defines a New Embedded Generator as any Half Hourly (HH) metered embedded generation unit commissioned after 30 June 2017, where commissioned is defined as the point at which an MSID is first registered in SMRS and first commences generation.</p> <p>The implementation of CMP264 requires both SVA and CVA meter data flows for new embedded generation. It is believed that NGET already receives the necessary CVA metered data to allow for the benefits of CMP264 to be realised. If this assumption is proved invalid, this Modification will require including CVA as well as SVA registered generators.</p>	
Description of Issue or Defect that Modification Proposal Seeks to Address <i>(mandatory by originator)</i> <p>This Modification aims to facilitate the implementation of Connection Use of System Code (CUSC) Modification 264. CMP 264 seeks to limit the impact of the continuing lack of a level playing field between New Embedded Generators and other generation plant, by suspending access to Triad avoidance for New Embedded Generators until Ofgem has completed its consideration of the issues (including any review which may ensue) and fully implement any resulting changes.</p> <p>CMP264 sets out the issues associated with Triad Avoidance, which it aims to limit by suspending access to Triad Avoidance for New Embedded Generators until Ofgem has completed its consideration of the issues (including any review which may ensue) and fully implement any resulting changes.</p> <p>In order to calculate TNUoS charges, at present the Supplier Volume Allocation Agent (SVAA) sends the Transmission Company net, aggregated metered data for SVA metering systems. In order to implement and discharge the requirements of CMP264, the Transmission Company will need gross metered data for specific SVA New Embedded Generation. This Modification seeks to address the issue that the BSC does not provide this gross metered data to the Transmission</p>	

Modification Proposal – BSCP40/03	MP No: 349 <i>(mandatory by BSCCo)</i>
Company, which will be needed in order for CMP264 to achieve its aim.	
Impact on Code <i>(optional by originator)</i> BSC Section S ‘Supplier Volume Allocation’.	
Impact on Core Industry Documents or System Operator-Transmission Owner Code <i>(optional by originator)</i> We are not aware of any impact on Core Industry Documents or System Operator-Transmission Owner Code	
Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties <i>(optional by originator)</i> There are no changes to BSC Systems anticipated. However, changes will be required to Supplier, NHHDA and National Grid systems.	
Impact on other Configurable Items <i>(optional by originator)</i> To be confirmed.	
Justification for Proposed Modification with Reference to Applicable BSC Objectives <i>(mandatory by originator)</i> The applicable BSC Objectives that will be better facilitated by this Modification are: (a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence The proposed Modification will enable the processes and information flows required to deliver CMP264 in an efficient, economic and co-ordinated manner. (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 The existence of large non-cost reflective Triad avoidance values is likely to distort investment decisions by favouring small generation units over large ones that may be more efficient. This could cause more efficient investments which do not benefit from Triad avoidance to be abandoned or deferred while less effective ones, which do so benefit, go ahead. This would increase total system costs, which is likely to lead to higher costs for consumers. Cost reflective charges would lead to better investment decisions and lower costs for consumers.	
Is there a likely material environmental impact? <i>(optional by originator)</i> No direct environmental impact (ie beyond any impact from CMP264).	

Modification Proposal – BSCP40/03	MP No: 349 <i>(mandatory by BSCCo)</i>
Urgency Recommended:	
Yes.	
Justification for Urgency Recommendation <i>(mandatory by originator if recommending progression as an Urgent Modification Proposal)</i>	
<p>A decision needs to be made on this modification in time to allow necessary system changes to be made before the cut-off date for New Embedded Generators defined in CMP264 (currently 30 June 2017). Failure to meet this timetable would be likely to have a significant commercial impact on relevant industry parties and delay the benefits of CMP264 being realised. Furthermore, this Modification is best progressed in line with CMP264 to allow Ofgem to have all the necessary information to enable it to make a holistic decision based on the combined costs and benefits of both CMP264 and this modification. Therefore, urgency is required to ensure this Modification and CMP264 can be presented to Ofgem for decision at the same time.</p>	
Self-Governance Recommended:	
No.	
Justification for Self-Governance Recommendation <i>(mandatory by originator if recommending progression as Self-Governance Modification Proposal)</i>	
N/A.	
Fast Track Self-Governance Recommended:	
No.	
Justification for Fast Track Self-Governance Recommendation <i>(mandatory by originator if recommending progression as Fast Track Self-Governance Modification Proposal)</i>	
N/A.	
Should this Modification Proposal be considered exempt from any ongoing Significant Code Reviews? <i>(optional by originator in order to assist the Panel decide whether a Modification Proposal should undergo a SCR Suitability Assessment)</i>	
<p>Yes. We are not aware of any current Significant Code Review (SCR) whose scope overlaps with the scope of this modification. If Ofgem opens an SCR which includes embedded generation Triad avoidance, this modification should be considered exempt because of its temporary/transitional nature.</p>	

Details of Proposer:

Name: Paul Carman

Organisation: ScottishPower

Telephone Number: 0141 614 5523

Email Address: paul.carman@scottishpower.com

Details of Proposer's Representative:

Name: Andy Kelsall

Organisation: ScottishPower

Telephone Number: 014161 45509

Email address: andy.kelsall@dataserve-uk.com

Details of Representative's Alternate:

Name: Stuart Noble

Organisation: ScottishPower

Telephone Number: 0141 568 2831

Email address: stuart.noble@scottishpower.com

Attachments: No *(delete as appropriate) (mandatory by originator)*

If Yes, Title and No. of Pages of Each Attachment: