

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

P260: Extension to data provided to the Transmission Company in the TUoS Report

The Transmission Company receives the TUoS Report from SVAA for use in its invoicing system. It is proposed to expand net GSP group data in the TUoS report to provide gross GSP group data.



Modification Group unanimously recommends

Approval of P260 Alternative



Minor Impact:
BSC Section V, BSC Annex V-1 and SVA systems

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About this document:

This document is an Assessment Report, which ELEXON will present to the Panel on 09 September 2010, on behalf of the P260 Modification Group. It outlines the solution, impacts, costs, benefits and the implementation approach for this change. It includes the Group's recommendation as to whether the change should be approved.

The Panel will consider the Group's recommendations, and will agree an initial view on whether or not this change should be made. The Panel will then seek industry comments on its initial view through a further consultation.

You can download copies of the full industry consultation responses and the Transmission Company impact assessment [here](#).



Any questions?

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Why Change?

The Transmission Company currently receives the Transmission Use of System (TUoS) Report from Supplier Volume Allocation Agent (SVAA) which contains, by Supplier BMU, net Half Hourly and Non Half Hourly demand/generation data for each GSP group.

As part of its ongoing work to develop an enduring Charging Methodology the Transmission Company have requested Half Hourly and Non Half Hourly data to be reported on a gross basis rather than a net one.

Solution

Proposed

The Proposed solution amends the TUoS Report to include NHH and HH Allocated Import and Export Volume data per Supplier per GSP Group as separate data items.

Alternative

The Alternative solution would, further to the amendments to the TUoS report suggested under the Proposed solution, produce a second report containing the same data items being added to the TUoS Report, but aggregated up to GSP group level rather than Supplier BMU. This second report will be made accessible to interested BSC Parties via the ELEXON Exchange and the BSC Central Services File Transfer Protocol (FTP) server.

Impacts & Costs

This Modification **will not impact BSC Parties** as the TUoS report is only sent between National Grid and SVAA. Under the Alternative, accessing the new report is optional.

The estimated implementation cost for the Proposed Modification is £76,840 (£56,840: ELEXON, £20,000: Transmission Company)

The estimated implementation cost for the Alternative Modification is £99,600 (£79,600: ELEXON, £20,000: Transmission Company)

Implementation

The Group's recommended implementation approach for the Proposed and Alternative is:

- **31 March 2011** if an Authority decision is made by **19 November 2010**; or
- In the **Next Available Release**, allowing for a minimum 4 month implementation period, if a decision is made after **19 November 2010**.

The Case for Change

The Group's final unanimous recommendation is that P260 Alternative Solution should be approved.

The Group's view is that the Alternative Solution would better facilitate Applicable BSC Objectives (a) and (c). A minority of the Group believed it will assist the Transmission Company in meeting its licence obligation to develop and implement an enduring Charging Methodology, and better validate Generator Demand Forecasts (Objective (a)). The Group unanimously believed that making the data more widely available to Parties increases market transparency and understanding which has competition benefits for the market (Objective (c)).

A Majority of the Assessment Consultation responses agreed with the Group's initial views and recommendation to approve the Alternative solution.

Recommendations

The Group unanimously believe that P260 Alternative should be approved.

2 Why Change?

Background

Currently in England and Wales, Generators with plants connected at 132kV are classed as embedded Generators and depending on their registered capacity, do not pay generator **Transmission Network Use of System** (TNUoS) charges and receive embedded benefits.

However, the definition of transmission in Scotland means that Generators with plants connected at 132kV, irrespective of their registered capacity are not treated as embedded. Therefore, these Generators are liable for TNUoS charges.

To compensate for the difference in treatment in charging between Scotland and England/Wales an interim charging solution was introduced at BETTA. This interim solution is that 132kV generation connected in Scotland receive the 'small generator discount'. The arrangements for this discount will be removed on 31 March 2011.

The Transmission Company has a licence obligation (Standard Licence Condition C13) to develop and implement enduring arrangements prior to the expiry date of the Scottish 132kV connected discount arrangements.

How does this impact The BSC?

The Transmission Company receive a Transmission Use of System (TUoS) Report from the Supplier Volume Allocation Agent (SVAA) on a daily basis. The TUoS report contains Half Hourly (HH) and Non Half Hourly (NHH) Allocated Volume data for Supplier Balancing Mechanism Units (BMU) for each Grid Supply Point (GSP) group. Section V of the BSC states that this data is provided on the basis of demand net of generation.

Proposals currently being progressed by the Transmission Company to develop an enduring arrangement would require a breakdown of Half Hourly (HH) gross demand (import) and generation (export), by Supplier BMU, in each GSP group rather than the current net basis.

Changes to BSC Section V and SVAA systems are required to reflect/include this additional information.

Timescales

The Transmission Company raised P260 so that it could be progressed in tandem with the final stages of the charging methodology work they were undertaking. Thus allowing the Authority to make their final decision on the charging proposals at the same time as considering the P260 Final Modification Report. If approved, the necessary BSC changes could then be in place in time for the new methodologies to take effect from April 2011.

New Independent review of the Charging Arrangements

During the Assessment Phase of P260, the Department of Environment and Climate Change (DECC) and Ofgem announced a new independent review of the Charging Arrangements.

As a consequence the Transmission Company's work on developing an enduring solution for the replacement of the 'small generator discount' is currently on hold with the final methodology consultation postponed as a result of the new review.

The Proposer has decided to continue with the progression of the Modification. This is a pragmatic approach, as if the Charging Methodology review continues soon, the Authority have the ability to approve the P260 solution in time for April 2011 if appropriate. The fall back dates also provide the Authority with the scope to make a decision to approve or reject P260 should the resolution of the review take longer than November 2010.

Further information on timescales can be found under section 6 'Implementation'.



The **Transmission Network Use of System** charge published for the relevant year as set out in the statement provided for in Standard Licence Condition C4 of the Transmission Licence held by National Grid.



A **Grid Supply Point** is a Systems Connection Point at which the Transmission System is connected to a Distribution System.

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The TUoS Report (P0210 file) will need to be updated to provide Gross HH import and export volume to provide the Transmission Company with the required data.

The TUoS report will therefore require the following changes:

- 1) Rename the 'Period BMU HH Allocated Volume' to 'Net Period BMU HH Allocated Volume';
- 2) Insert two columns next to the renamed column: 'Gross Period BMU HH Allocated Import Volume' and 'Gross Period BMU HH Allocated Export Volume'.

Additional NHH import and export data

Although the current work to develop an enduring Charging Methodology solution only requires disaggregated HH data, the Group questioned why the proposed solution only included disaggregated HH data, and not NHH data as well.

The Group voiced concerns that by not including disaggregated NHH data, you immediately exclude the ability for all Embedded Generation to be covered (i.e. NHH) and may result in further changes being required to the TUoS Report at a later point. Furthermore, by including disaggregated NHH data in this solution would remove the cost to progress and implement a future Modification. In the interim, the Transmission Company could simply ignore the additional NHH data.

Following this discussion the Proposer agreed to include disaggregated NHH data in the Proposed solution, thus future proofing the Proposed changes to the TUoS Report.

Therefore the following changes will also be required to the NHH data to mirror the HH data changes:

- 1) the 'Period BMU NHH Allocated Volume' renamed to 'Net Period BMU NHH Allocated Volume'; and
- 2) two additional columns inserted next to the renamed column: 'Gross Period BMU NHH Allocated Import Volume' and 'Gross Period BMU NHH Allocated Export Volume'.

The table below shows the proposed structure of the new TUoS report using a random BMU sample data:

Record Type	Sett Prd	End Time	<u>NET</u> HH Allocated Volume	<u>Gross HH Allocated Import Volume</u>	<u>Gross HH Allocated Export Volume</u>	<u>NET</u> NHH Allocated Volume	<u>Gross NHH Allocated Import Volume</u>	<u>Gross NHH Allocated Export Volume</u>
HHA	1	00:30	4.0352	6.5869	2.5517	95.0969	131.2337	36.1368
HHA	2	01:00	5.1674	8.7669	3.5995	89.7166	117.9773	28.2607
HHA	3	01:30	4.6250	9.2500	4.6250	86.8399	117.6299	30.7900
HHA	4	02:00	4.7330	7.333	2.6000	84.3064	126.4596	42.1532
HHA	5	02:30	3.7095	5.8185	2.1090	79.8298	108.7652	28.9354

Provision of this data will allow the Transmission Company to undertake its duties regarding the development of charges on a more cost reflective basis. In addition, it would help to facilitate a review of the charging arrangements for embedded generators which, as a result of Standard Licence Condition C13 of the Transmission Licence, will need to conclude and be implemented by April 2011.

4 Alternative Solution

The Group has developed an Alternative Solution which seeks to make some of the data in the TUoS report available to all interested Parties.

Proposed Alternative

Making the content of the TUoS report more widely available

The Group discussed the transparency of the information contained in the TUoS Report and whether the Report should be made more widely available. The majority of the Group agreed that making the content more widely available should be explored and a solution developed to achieve it.

Confidentiality of data

The TUoS report contains HH and NHH Import and Export Volumes disaggregated by Supplier BMU. The Group were concerned that this level of disaggregation may give rise to confidentiality issues if the content was made more widely available.

To address this issue the Group agreed that the more widely available version of the TUoS Report should aggregate the Gross HH and NHH Allocated Import/Export Volume per Settlement Period within each GSP group. By aggregating up to this level the information provided in the 'GSP Group Import and Export Totals' Report will still prove useful to Parties, increase the transparency of the TUoS report content, while avoiding any issues around Supplier data confidentiality.

How will the report be published?

Once generated the 'GSP Group Import and Export Totals' report will then be available to download via the BSC Central Services **File Transfer Protocol (FTP)** server and via the **ELEXON Exchange**.

The report will be generated every day after the TUoS Report, and will then be accessible for 7 days by interested Parties. After the 7 day period it will be replaced with a newer report. Making the data available via these methods means that accessing it is optional, so BSC Parties can use the report if they choose to.

Is the Alternative within scope?

Under the BSC, any Alternative Modification must address the defect/issue as detailed in the original Modification Proposal form. There was discussion within the Group as to whether making the content of the TUoS report more widely available, addressed the identified defect of providing the Transmission Company with sufficient data to allow them to develop and implement an enduring charging methodology and meet their licence obligation.

It was noted that the Modification Proposal stems from the need for the Transmission Company to receive the additional import/export data. However, the majority of the Group argued that making the TUoS report more widely available (in addition to the required changes to the existing report) would allow the Transmission Company to receive the extra data they need, whilst additionally allowing interested Parties to use the data to assist the Transmission Company in meeting their licence obligation. The Group therefore concluded that making the TUoS report available to a wider audience would meet the original defect identified.



What is File Transfer Protocol (FTP)?

File Transfer Protocol (FTP) is a standard network protocol which the BSC Parties use to transfer files to and from the BSC Systems. This service requires login credentials which are supplied during the registration process. Full details on FTP can be found in the Section 3 of Participant Communications Overview Guide (PCOG) which can be accessed on the ELEXON website [here](#).



What is the ELEXON Exchange?

The ELEXON Exchange, previously called 'NETA Exchange' is accessed via the [ELEXON Portal](#). It is a site that allows you to browse, search and download files relevant to BSC Central Services, and to send messages with file attachments to other users of the system.

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Other approaches considered

Report using D0276 flow

Whilst the conclusion of the Group was to develop an Alternative solution involving the publication of an aggregated TUoS report via FTP and the ELEXON exchange, the Group did consider utilising the D0276¹ as the basis for the report generation. They considered the D0276 flow as it contains similar information as the P0210 (TUoS Report). The content of the D0276 could have been collated together to provide the same level of information as the 'bolt on' report. However, the group decided that whilst this was a viable approach to generate the information, it made sense that the any additional report was generated in the same manner as the P0210. This was in order to keep it closely related to the TUoS report, maximise implementation efficiencies and therefore minimise the cost to implement the Alternative solution.

Is there a more Manual Approach?

As part of previous work to aid the Transmission Company with its Charging Methodology work, a manual script had been developed by ELEXON to provide the Transmission Company with relevant data. The Group considered if the script could form the basis of a manual solution to the issue.

The Group discussed a manual solution where a script would be run on a daily basis, negating the need for direct changes to the SVA systems. The ELEXON costs for implementing this change were estimated at £15K. However there would be significantly larger cost for the Transmission Company to change their systems to receive the new file. Additionally the manual approach would involve a degree of risk, as it would not have the same level of checks in place that exist in the SVA Systems.

The Group therefore decided not to progress with a manual solution.

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¹ D0276 - GSP Group Consumption Totals Report

5 Impacts & Costs

Costs

Proposed			Alternative						
ELEXON Cost			Total ELEXON cost	Total National Grid Costs	ELEXON Cost			Total ELEXON cost	Total National Grid Costs
Man Days	Cost	Service Provider			Man Days	Cost	Service Provider		
28.5	£6,840	£50,000	£56,840	£20,000	40	£9,600	£70,000	£79,600	£20,000

Impacts

Impact on BSC Systems and process

BSC System/Process	Potential impact
SVA system and process	To provide the additional disaggregated HH and NHH data and to create the new 'GSP Group Import and Export Totals' Report

Impact on BSC Parties and Party Agents

Proposed Solution: None - the Proposed Modification affects data that is provided by ELEXON to the Transmission Company. However, indirectly the extra information will be used in the Transmission Company's new approach to Charging.

Alternative Solution: Parties will have access to the information being added to the TUoS Report aggregated at GSP level via the BSC Central Services FTP Server and the ELEXON Exchange.

Impact on Transmission Company

The Transmission Company need to make the necessary software modifications required to receive process and store the additional data. The costs associated of putting the Proposed and Alternative modifications in place are:

- Requirements and Design Stage: £8,000
- Development and Implementation Stage: £12,000
- Total estimated costs: £20,000

Impact on Code

Code section	Potential impact
Annex V-1	Amendments to Table 7 of Annex V-1 to capture additional information that the TUoS report will contain. (Alternative only) Add details of the new Aggregated TUoS (GSP Group Import and Export Totals) Report. Please refer to Attachment A – for Proposed and Alternative legal text.

Impact on Code Subsidiary Documents

CSD	Potential impact
SVA Data Catalogue Volume 1 + 2	Addition of the Data Item Names to reflect the separation of 'import' and 'export' of the Period BMU HH and NHH Allocated Volume in Appendix B (Alternative only) Capture the new accessible aggregated GSP Group Import and Export Totals Report

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Recommendation

Modification Group recommends approval of the P260 Alternative

Why has this Modification been raised now?

The Group questioned why this Modification had been raised now, when the final decisions on the resolution of the charging methodology work had yet to be made.

The Proposer explained that:

- 1) the extra data in the TUoS report will be needed for all of the potential charging solutions that are being considered;
- 2) P260 has been raised now so it can be considered by the Authority at the same time as they reach a determination on the Charging Methodology recommendations made by the Transmission Company; and
- 3) raising and progressing P260 now means that if approved it can be implemented and in place in time for when the new Charging Methodology would take effect from April 2011.

When will P260 be implemented?

The Group initially recommends that P260 should be implemented:

- **31 March 2011** if an Authority decision is made by **19 November 2010**; or
- In the **Next Available Release**, allowing for a minimum 4 month implementation period, if an Authority decision is reached **after 19 November 2010**.

The initial date will ensure that the Transmission Company can implement necessary changes in time to meet their obligation, while the fall back date will be in place to make sure that no work is undertaken until the Authority makes a final decision on the new Charging Methodology.

Examples of fall back date implementation

The Group thought it would be prudent to provide examples of when implementation would occur if a decision was made in line with the fall back date for the currently published BSC Release implementation dates.

BSC Release	Decision by date for Release	Actual implementation date
June 2011	11 February 2011	30 June 2011
November 2011	17 June 2011	03 November 2011
February 2012	07 October 2011	23 February 2012
June 2012	10 February 2012	28 June 2012
November 2012	15 June 2012	01 November 2012

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Why will P260 be better than the existing BSC Requirements?

The Group's unanimous recommendation is that **P260 Alternative** will better facilitate the achievements of the **Applicable BSC Objective (c)** with some members believing there is some additional benefit under **(a)**.

Proposed Modification vs. Current Arrangements

The Group were **split** on whether or not the Proposed Modification would better facilitate the Applicable BSC Objectives when compared to the current arrangements.

Half of the group believed that, whilst the Proposed Modification was a sensible change, it was **neutral** against the Applicable BSC objectives. This was because no new Charging Methodology has yet been approved by the Authority that would specifically require this data. Therefore, it is not guaranteed that BSC changes will be required. Implementing the Proposed Modification could result in nugatory work if a different Charging Methodology was to eventuate. Were the data to be required, a manual workaround could be used to provide the requested data to National Grid on an ad hoc basis in order for an enduring solution (such as the Proposed Modification) to be taken forward.

The other Half of the Group did however believe that the Proposed Modification would better facilitate **Applicable BSC Objective (a)**. The additional data the Proposed solution would provide, would enable the Transmission Company to develop a charging methodology, and therefore meet its licence obligation SLC C13. Additionally the extra data would help the Transmission Company to better validate User Demand Forecasts, and hence more accurately set TNUoS tariffs.

The table below summarises the views of half of the Group on how the Proposed Modification better facilitates the Applicable BSC Objectives:

Objective (a)	
Benefits	Disadvantages
<ul style="list-style-type: none"> Provision of data helps the Transmission Company meet its licence obligation, to develop and implement an enduring Charging methodology; and Additional data would enable the Transmission Company to better validate user demand forecasts, which would result in the better setting of TNUoS tariffs. 	None

Alternative Modification vs. Current Arrangements

In a similar manner to the Proposed solution, half of the Group noted that it was difficult to consider the change in isolation, with regard to Objective (a). However due to the increases in data transparency that the Alternative solution provides, they believe the solution will aid competition and therefore better facilitate **Applicable BSC Objective (c)**.

The Group's unanimous views against applicable BSC Objective (c) and the minority Group views against applicable BSC Objective (a) are summarised below:

a) Efficient discharge of the obligations of the Transmission Licence.

b) Efficient, economic and co-ordinated operation of the national electricity transmission system.

c) Promoting effective competition in the generation and supply of electricity and in the sale and purchase of electricity.

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

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Objective (a)	
Benefits	Disadvantages
<ul style="list-style-type: none"> Provision of data helps the Transmission Company meet its licence obligation, to develop and implement an enduring Charging methodology; Additional data would enable the Transmission Company to better validate user demand forecasts, which would result on the setting of TNUoS tariffs; and By making the additional content of the TUoS Report more widely available will help Parties assist the Transmission Company in meeting its Licence Obligations. 	None

Objective (c)	
Benefits	Disadvantages
Making the additional data contained in the TUoS Report accessible to Parties benefits competition for the market, due to the publication of the information increasing market transparency and understanding.	None

Proposed Modification vs. Proposed Alternative

Since the Group believe that Alternative increases competition by increasing transparency through the provision of the added data, to the TUoS report, to Parties, in addition to the benefits identified by half of the Group under the Proposed, the Group **unanimously** believes that the Alternative Solution is better than the Proposed Solution.

8 Assessment Consultation Responses

The **Majority** of Assessment Consultation respondents supported the initial recommendations of the Group. The main points raised are detailed below, with the full Consultation Responses available on the ELEXON website [here](#).

Assessment Consultation Responses

Should the data be more widely available?

The Group consulted on whether there was benefit in making some of the data contained in the TUoS Report more widely available (via the Alternative solution), and whether aggregating the data up to GSP Group level would address any concerns over confidentiality.

A Majority of respondents supported the Alternative, and the publication of some of the data contained in the TUoS report. They agreed that by publishing the data at an aggregated GSP group level would address any issues of confidentiality.

One respondent indicated that they did not support P260 and the publication of the of some of additional data, via the Alternative. They believed that the Modification was not necessary, particularly as it is unknown what the outcome of the Charging Methodology review will be.

Timeliness and Nugatory work

A number of responses to the Assessment Consultation raised concerns on the timeliness of the Modification. They highlighted that P260 should not be implemented, if approved, until the resolution of all the Charging Methodology work to avoid nugatory cost. Also since the announcement by Ofgem and DECC, to undertake a new review of charging arrangements, concerns were also raised that the Modification is no longer needed.

The Group considered these views with one member suggesting that P260 should be put on hold pending the outcome of the new Charging review, or withdrawn entirely. As mentioned previously the Proposer has decided to not withdraw P260, as the Modification provides benefits in addition to helping put in place a new Charging Methodology.

Also the implementation approach has been constructed to allow sufficient flexibility for the Authority to make a decision on P260 once the resolution of the Charging review has been reached. This would then avoid nugatory cost being undertaken.

Transmission Company Analysis

The Transmission Company Analysis was supportive of the findings of the Group. They believe that the Proposed and Alternative solutions would resolve the identified 'defect', through the provision on the additional data they require.

The additional information that the Proposed and Alternative solutions that P260 would provide would enable them to better validate user demand forecasts and therefore more accurately set TNUoS tariffs to collect allowed revenue. Additionally it would improve their ability to develop a cost reflective Charging Methodology thus meeting their Transmission Licence, particularly the obligation to use best endeavours to develop and implement an enduring solution to the small generator discount by 1 April 2010.

Therefore the Transmission Company believe the Proposed and Alternative solutions will better facilitate the achievement of Applicable BSC Objective (a). The Transmission Company agree with the Modification Group that the Alternative solution would also better facilitate Applicable BSC Objective (c), for the reasons identified by the Group.

You can download the full response [here](#).

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9 Recommendations

The P260 Modification Group invites the Panel to:

- **AGREE** an initial recommendation that Proposed Modification P260 should not be made;
- **AGREE** an initial recommendation that Alternative Modification P260 should be made;
- **AGREE** an initial Implementation Date for the Proposed and Alternative P260 Modifications of:
 - **31 March 2011** if an Authority decision is made **by 19 November 2010**; or
 - in the **Next Available Release**, allowing for a minimum 4 month implementation period, if a decision is reached **after 19 November 2010**.
- **AGREE** the draft legal text for Proposed Modification P260;
- **AGREE** the draft legal text for Alternative Modification P260;
- **AGREE** that P260 is submitted to the Report Phase; and
- **AGREE** that ELEXON should issue the P260 draft Modification Report for consultation and submit the results to the Panel to consider at its meeting on 14 October 2010.

10 Modification Group Information

The P260 Modification Group consists of members of the Volume Allocation Standing Modification Group (VASMG).

Table 1 lists the Terms of Reference considered by the P260 Modification Group, a summary of their conclusions and where details of the Group's discussions/conclusions are documented.

Table 1 – P260 Assessment Procedure Terms of Reference

Area of Terms of Reference	Group's Initial conclusions:	See:
Discuss the transparency of the current TUoS report mechanism	The Group agreed that some of the content of the TUoS report could be made more transparent by making it more widely available on an aggregated basis. This led to the discussion and development of the Alternative Modification	Section 4
Identify the costs for any manual workarounds	The Group discussed a more manual approach for generating the additional information required by National Grid. However it was not taken forward as the long term costs of this approach were potential greater and the manual approach could be prone to error as the data would have less rigorous checks than the systems based P0210 change.	Section 4
Consider any wider Industry issues concerning National Grid receiving the requested data	The Group concluded that there was no reason why the content of the TUoS Report should not be more widely available on an aggregated basis. Hence the development of the Alternative Solution	Section 4
Consider the effect of P260 on the Applicable BSC Objectives	The Groups initially unanimous view is that the Alternative solution better facilitates Applicable BSC Objective (c), with some members believing there is some additional benefit under (a).	Section 7
Consider whether and Alternative Modification is required	The Group has developed an Alternative solution, which will make some of the content of the TUoS report more widely available in an aggregated format.	Section 4
Agree the implementation approach for P260	The Group has agreed an implementation approach.	Section 6

Table 2 – P260 Planned Assessment Timetable

Date	Assessment Activity
04 June 2010	National Grid raise P260
10 June 2010	IWA presented to the Panel
07 July 2010	Modification Group meeting 1
26 July 2010	Modification Group meeting 2 (via teleconference)
03 August 2010	ELEXON issues Assessment Phase consultation
17 August 2010	Consultation Responses due
24 August 2010	Modification Group meeting 3 (via teleconference)
03 September 2010	ELEXON submits the Group's Assessment Report to the Panel
09 September 2010	ELEXON presents the Group's Assessment Report to the Panel

Table 3 – P260 Modification Group Attendance

Member	Organisation	07/07/2010	26/07/2010 (via teleconference)	24/08/2010
Adam Lattimore	ELEXON (Chairman)	✓	✓	✓
David Barber	ELEXON (Lead Analyst)	✓	✓	✓
Ivo Spreeuwenberg	National Grid (Proposer)	✓	✓	✓
Chris Stewart	Centrica	✓	✓	✓
Paul Mott	EDF Energy	✓	✓	X (confirmed views prior to meeting)
Paul Jones	E.ON UK	✓	✓	✓
Garth Graham	Scottish and Southern Energy	✓	✓	✓
Phil Russell	Independent Consultant	✓	✓	✓
Attendee	Organisation			
Nicholas Brown	ELEXON (Lawyer)	✓	X	X
Mahesh Gogate	ELEXON (Design Authority)	✓	✓	✓
Martin Mate	EDF Energy	X	X	✓

11 Further Information

Attachment A: Proposed and Alternative Legal Text

All consultation responses and the Transmission Company Analysis are available on the [P260](#) page of the ELEXON website.

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