

Responses from P191 Draft Report Consultation

Consultation Issued 17 October 2005

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	EDF Energy	P191_dMR_001	9	0
2.	National Grid Electricity Transmission plc	P191_dMR_002	1	0
3.	RWE NPower	P191_dMR_003	10	0
4.	Scottish Power	P191_dMR_004	6	0
5.	CE ElectricUK	P191_dMR_005	2	0
6.	British Gas Transco	P191_dMR_006	1	0
7.	United Utilities	P191_dMR_007	1	0

P191 REPORT PHASE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	Stephen Moore
Company Name:	EDF Energy
No. of BSC Parties Represented	9
Parties Represented	EDF Energy Networks (EPN) plc; EDF Energy Networks (LPN) plc EDF Energy Networks (SPN) plc; EDF Energy (Sutton Bridge Power) EDF Energy (Cottam Power) Ltd; EDF Energy (West Burton Power) Ltd; EDF Energy plc; London Energy plc; Seeboard Energy Limited
No. of Non BSC Parties Represented	0
Non Parties represented	N/A
Role of Respondent	Supplier/Generator/ Trader

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P191 and the provisional recommendation to the Authority contained in the draft Modification Report that P191 should be made? Please give rationale.	Yes	Allowing Power Park modules – a clearly defined term under the Grid Code – the ability to become BM Units without having to go through the non-standard application process is a clear improvement in efficiency.
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	

Q	Question	Response	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P191? Please give rationale.	Yes	P191 requires no systems changes, so the benefits of the modification should be available 10 days after an Authority decision.
4.	Are there any further comments on P191 that you wish to make?	No	

Please send your responses by **Midday on Friday 28 October 2005** to modification.consultations@elexon.co.uk and please entitle your email 'P191 **Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Panel.

Any queries on the content of the consultation pro-forma should be addressed to Sakib Azam on 020 7380 4316, email address sakib.azam@elexon.co.uk.

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Respondent:	Richard Dunn
Company Name:	National Grid Electricity Transmission plc
No. of BSC Parties Represented	1
Parties Represented	National Grid Electricity Transmission plc
No. of Non BSC Parties Represented	0
Non Parties represented	N/A
Role of Respondent	Transmission System Operator

Q	Question	Response <small>Error! Bookmark not defined.</small>	Rationale
1.	Do you agree with the Panel's views on P191 and the provisional recommendation to the Authority contained in the draft Modification Report that P191 should be made? Please give rationale.	Yes	P191 will better facilitate Applicable CUSC objectives d) and c) by significantly reducing the circumstances in which generators need to apply for non-standard BMU configurations in respect of windfarms and removing potential barriers to entry inherent in the current complex registration process.
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	The final P191 Modification Group reviewed the legal text at its final meeting on 18 th October and were satisfied that it properly implemented P191 within the BSC.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P191? Please give rationale.	Yes	The changes to the BSC are minor and should be introduced as soon as possible.

Q	Question	Response <small>Error! Bookmark not defined.</small>	Rationale
4.	Are there any further comments on P191 that you wish to make?	No	

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Respondent:	<i>Richard Jones</i>
Company Name:	<i>RWE Npower</i>
No. of BSC Parties Represented	10
Parties Represented	RWE Trading GmbH, RWE Npower plc, Npower Commercial Gas Ltd, Npower Co-gen Trading Ltd, Npower Direct Ltd, Npower Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd
No. of Non BSC Parties Represented	<i>None</i>
Non Parties represented	<i>None</i>
Role of Respondent	<i>Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent</i>

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P191 and the provisional recommendation to the Authority contained in the draft Modification Report that P191 should be made? Please give rationale.	Yes	We do agree with the Panel's view and strongly believe that P191 better promotes objectives (c) and (d).
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	Considering the legal text is identical to the original proposal we do agree.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P191? Please give rationale.	Yes	No comment

Q	Question	Response	Rationale
4.	Are there any further comments on P191 that you wish to make?	No	No comment

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Respondent:	Man Kwong Liu
Company Name:	SAIC Ltd
No. of BSC Parties Represented	6
Parties Represented	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i> Scottish Power UK plc ; ScottishPower Energy Management Ltd. ; ScottishPower Generation Ltd ; ScottishPower Energy Retail Ltd. ; SP Transmission Ltd ; SP Manweb plc .
No. of Non BSC Parties Represented	0
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i> 0
Role of Respondent	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributor / other – please state ¹)</i> Supplier / Generator / Trader / Consolidator / Exemptable Generator

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P191 and the provisional recommendation to the Authority contained in the draft Modification Report that P191 should be made? Please give rationale.	Yes	We agree with the Panel's provisional recommendation that P191 Modification should be made. We believe that P191 better facilitates the achievement of BSC Objective (d) Promoting efficiency etc, by reducing the administrative burden of dealing with non-standard BM Unit applications for wind farm developments, and will better facilitate the achievement of BSC Objective (c) Promoting competition, by removing ambiguity in the BM Unit registration process and thus removing a potential barrier to entry.

¹ Delete as appropriate – please do not use strikethrough, this is to make it easier to analyse the responses

Q	Question	Response	Rationale
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	The legal text appears to be appropriate.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P191? Please give rationale.	Yes	We agree with the Panel's provisional recommendation that this Mod should be implemented 10 days following an Authority decision if approved.
4.	Are there any further comments on P191 that you wish to make?	No	We have no further comments.

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Respondent:	<i>Jamie Lowe</i>
Company Name:	CE ElectricUK
No. of BSC Parties Represented	2
Parties Represented	<i>YEDL NEDL</i>
No. of Non BSC Parties Represented	
Non Parties represented	
Role of Respondent	<i>Distributor</i>

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P191 and the provisional recommendation to the Authority contained in the draft Modification Report that P191 should be made? Please give rationale.	Yes	We support the change. We can not see any detrimental impact to the DNO.
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P191? Please give rationale.	Yes	

Q	Question	Response	Rationale
4.	Are there any further comments on P191 that you wish to make?	No	

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Respondent:	Danielle Lane
Company Name:	BGT
No. of BSC Parties Represented	
Parties Represented	
No. of Non BSC Parties Represented	
Non Parties represented	
Role of Respondent	

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P191 and the provisional recommendation to the Authority contained in the draft Modification Report that P191 should be made? Please give rationale.	Yes	BGT support this modification proposal. We agree with the Panel's view that P191 better facilitates objective d) and c), for the reasons given in the modification report.
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	We believe the legal text correctly reflects the intent of the modification proposal.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P191? Please give rationale.	Yes	We agree with the recommended Implementation Date for P191.
4.	Are there any further comments on P191 that you wish to make?	No	

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Respondent:	<i>Name</i>
Company Name:	United Utilities
No. of BSC Parties Represented	one
Parties Represented	norwebd
No. of Non BSC Parties Represented	none
Non Parties represented	n/a
Role of Respondent	Distributor

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P191 and the provisional recommendation to the Authority contained in the draft Modification Report that P191 should be made? Please give rationale.	Yes	If this proposal is not accepted then it would result in the registration of a multitude of BMU's. This would then result in an administrative burden on LDSOs to collate all the metered information regarding individual wind turbines.
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P191? Please give rationale.	Yes	
4.	Are there any further comments on P191 that you wish to make?	Yes	

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