

Transmission Company Analysis

P370 'Allow the Panel to designate non-BSC Parties to raise Modifications''



Response Form

The Transmission Company is requested to complete an impact assessment for P370. In particular, we ask for your responses to the following questions and your reasons for those responses.

Your response

You are requested to respond to the questions in this form.



Your Details

How to return your response

Please send responses, entitled 'P370 Transmission Company Analysis', to bsc.change@elexon.co.uk by **5pm** on **Monday, 12 November 2018**.

Respondent

| | |
|--------------------------|-------------------|
| Name | Jonathan Wisdom |
| Organisation | National Grid ESO |
| Contact telephone number | +447929 375010 |

P370
Transmission Company
Analysis

30 October 2018

Version 1.0

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Transmission Company Analysis Questions

Question 1

Please describe the impact(s) of P370 on your ability as a Transmission Company to discharge your obligations efficiently under the Transmission Licence and to operate an efficient, economical and co-ordinated transmission system. Where applicable, please state any difference in impacts between the Workgroup's proposed solutions.

None

Question 2

Please outline the impact of P370 on the computer systems and processes of the Transmission Company. Include details of any changes needed as a result of implementing P370, and the lead time required for those changes. Where applicable, please state any difference in impacts between the Workgroup's proposed solutions.

None

Question 3

Please provide details of any consequential changes to Core Industry Documents and/or the System Operator Transmission Owner Code that would be needed as a result of implementing P370, and the lead time required for those changes. Where applicable, please state any difference in impacts between the Workgroup's proposed solutions.

None

Question 4

Please provide an estimate of development, capital and operating costs in appropriate detail which you as the Transmission Company anticipate that you would incur in implementing P370. Where applicable, please state any difference in costs between the Workgroup's proposed solutions.

None

Question 5

Please outline any potential issues relating to security of supply arising from P370.

None

Question 6

Please outline your views and rationale on whether P370 would help to achieve the Applicable BSC Objectives.

We consider the change may be more positive against (C) as although it allows parties to raise changes who do not contribute to the costs of the BSC, potentially increasing costs on those who do, allowing a broader set of parties to raise changes to the code may encourage competition. On balance, we consider it to be negative against (D) as the scope for additional steps in the process (such as appeals) and the potential for increased amounts of change overall in our view outweigh the potential minor improvement of moving the process to the BSC Panel.

Question 7

Please provide any other comments you may have on P370.

None

Further Information

To help us process your response, please:

- Email your completed response form to bsc.change@elexon.co.uk, entering "P370 Transmission Company Analysis" in the subject line
- Respond by **5pm on Monday, 12 November 2018**

Applicable BSC Objectives

The Applicable BSC Objectives are:

- (a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence
- (b) The efficient, economic and co-ordinated operation of the National Transmission System
- (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
- (d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements
- (e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]
- (f) Implementing and administering the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation
- (g) Compliance with the Transmission Losses Principle