

Responses from Second P63 Assessment Consultation

Consultation issued 20 May 2002

Representations were received from the following parties:

No	Company	File Number	No. Parties Represented
1.	East Midlands Electricity Distribution plc	P63_ASS2_001	1
2.	SEEBOARD Power Networks	P63_ASS2_002	1
3.	Northern Electric Distribution/Yorkshire Electricity Distribution	P63_ASS2_003	2
4.	LE Group Plc	P63_ASS2_004	6
5.	Western Power Distribution	P63_ASS2_005	2
6.	SEEBOARD Energy	P63_ASS2_006	1
7.	Scottish and Southern Energy	P63_ASS2_007	4
8.	Innogy	P63_ASS2_008	9
9.	British Gas Trading	P63_ASS2_009	1
10.	Aquila Networks (late response)	P63_ASS2_010	1
11.	SP Manweb plc/ SP Transmission Ltd (late response)	P63_ASS2_011	2
12.	Scottish Energy Retail Ltd/Scottish Power Trading Ltd/Scottish Power Generation Ltd. / SP Dataserve (late response)	P63_ASS2_012	4
13.	Powergen (late response)	P63_ASS2_013	4
14.	AccuRead (late response)	P63_ASS2_014	1
15.	TXU Energy	P63_ASS2_015	21

P63_ ASS2_001 - East Midlands Electricity Distribution plc

P63 ASSESSMENT CONSULTATION 2 – PRO-FORMA

Parties, Party Agents and SMRAs are invited to provide their response on the questions below.

Respondent:	Geoff Huckerby	
Responding on Behalf of	East Midlands Electricity Distribution plc	
Role of Respondent	PRS Agent/Distributor	
	Questions	YES/NO
Q1	Do you believe that the issue of Bulk Transfer of Party Agents needs to be addressed by a Modification to the Balancing and Settlement Code?	NO
Rationale: We are not aware of any constraints existing within the BSC that would prevent the transfer of large volumes of Party Agents. If this is the case then the rationale for raising the modification is flawed.		
Q2	Do you believe that the implementation of the solution discussed by the Volume Allocation Modification Group (i.e. data transmission by CD-ROM), as outlined within the attached High Level Requirements Specification, better facilitates the achievement of the Applicable BSC Objectives?	NO
Rationale: This solution is not practicable, given our response to Q1 then this is not necessary. This proposed process is not a robust solution in terms of technology, procedures or process. Additionally, this would require a change to the MRA (we are not aware of an MCP having been raised for this)		
Q3	If the answer to Q2 is No, do you believe that any other solution could be developed within the relevant Balancing and Settlement Code Procedures to better facilitate the Applicable BSC Objectives to address the defect identified by Modification Proposal P63?	NO

If you answered Yes to Q3 then please state proposed solution:		
We do not believe that the current baseline is defective. The solution is for affected Suppliers to agree a bilateral approach with each affected PRS Agent.		
Q4	The Volume Allocation Modification Group recommended that, in the case of a voluntary¹ Supplier initiated Bulk Transfer of Party Agents, there should be no obligation on the Supplier to retain the relevant information within their own systems that would be required to initiate such a Bulk Transfer. Do you agree with this recommendation?	NO
Rationale: Not sure what this means. What is the definition of 'relevant information'?		
Q5	Do you believe an Alternative Modification addressing Party Agent failure as described in the attached Consultation Document better facilitates the achievement of the Applicable BSC Objectives.	NO
Rationale: Ofgem are still reviewing the Supplier of Last Resort processes. This is a more fundamental piece of work than this modification.		
Q6	Do you agree that in the case of a voluntary Supplier initiated Bulk Transfer that the costs should be borne by the initiating Supplier?	N/A
Rationale: If a bilateral arrangement was in place this could be part of the discussions		
Q7	Do you agree that in the case of Party Agent Failure, costs should be borne by Parties, SMRAs and Party Agents.	NO
Rationale: This is not a straightforward question and should wait until the outcome of Ofgem's SoLR review		
Q8	Do you agree with the view of the Modification Group that, provided the appropriate checks were put in place, the accuracy of data entering Settlement will not deteriorate as a result of executing a Bulk Transfer process.	NO
Rationale: The proposed transfer by CD ROM is flawed and could impact on the Settlement process.		
Q9	Do you have any further comments to make on P63?	YES

¹ As opposed to a forced Bulk Transfer initiated as a result of Party Agent Failure.

Please state your comments:

This Modification was raised, based on the erroneous assumption that the BSC includes constraints on Change of Agent Processing. Given that it doesn't, and neither does any other governance document, we're unsure why this Mod has even continued to progress.

The VAMG issued a consultation document on this subject in March. It's our understanding that most Supplier Agents indicated in their responses that there were no significant processing constraints in their systems. I also believe that most MPAS providers responded along the lines that, although they did not wish to expose themselves to potential L.D.s by processing large numbers of CoA instructions on normal OWDs, they were prepared to undertake bulk processing over weekends by bi-lateral agreement. Again, that being the case, we're unsure why this Mod needs to progress.

The High Level Requirements Specification talks about:- changes to the way MPAS providers process CoA instructions (i.e. they would be sent and confirmed via CD-ROM rather than DTN); Qualification and Re-certification of Suppliers wishing to use the process; Application to Elexon by Suppliers wishing to undertake a bulk transfer; changes to BSCPs; etc.

This Mod suggests MPAS Providers deviating from use of the DTN, which surely affects the MRA, yet this isn't mentioned.

We would like to see the business justification for the cost of progressing this change and also the evidence that the Industry requires this change.

At this stage we are not willing to support this proposal. In the event that the proposal is accepted then we will consider appealing the decision to Ofgem.

P63_ASS2_002 – SEEBOARD Power Networks

P63 ASSESSMENT CONSULTATION 2 – PRO-FORMA

Parties, Party Agents and SMRAs are invited to provide their response on the questions below.

Respondent:	Bob Brennan	
Responding on Behalf of	Please list all Parties responding on behalf of (including the respondent company if relevant). SEEBOARD Power Networks	
Role of Respondent	(/SMRA/	
	Questions	YES/NO
Q1	Do you believe that the issue of Bulk Transfer of Party Agents needs to be addressed by a Modification to the Balancing and Settlement Code?	Yes

Rationale: The potential impacts to settlements in the scenario of bulk CoA, particularly DA & DC is we believe warrant of a Modification.

Q2	Do you believe that the implementation of the solution discussed by the Volume Allocation Modification Group (i.e. data transmission by CD-ROM), as outlined within the attached High Level Requirements Specification, better facilitates the achievement of the Applicable BSC Objectives?	No
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Rationale: We believe that there is an existing process to support CoA, and that it is upon this process bulk CoA should be expanded. All systems will handle CoA automatically, be it acceptance or rejection. By transferring the data via CD-ROM, we believe that the control is lost. What if the data is not correctly downloaded and applied? What about rejections? What about required by dates, these could be missed. There are too many potential issues with the CD-ROM option, and we believe puts more emphasis on us as a SMRA than the DTN approach.

Q3	If the answer to Q2 is No, do you believe that any other solution could be developed within the relevant Balancing and Settlement Code Procedures to better facilitate the Applicable BSC Objectives to address the defect identified by Modification Proposal P63?	Yes
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If you answered Yes to Q3 then please state proposed solution: Use standard CoA processes via the DTN, where the initiating supplier has an agreement with the old and new hubs, and the SMRA on volume restrictions.

Q4	The Volume Allocation Modification Group recommended that, in the case of a voluntary² Supplier initiated Bulk Transfer of Party Agents, there should be no obligation on the Supplier to retain the relevant information within their own systems that would be required to initiate such a Bulk Transfer. Do you agree with this recommendation?	No
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Rationale: All 1998 parties must have the obligation to maintain and retain relevant information within their systems. After all, there is no 'master' system for all data items, each party being a master of their own respective data.

Q5	Do you believe an Alternative Modification addressing Party Agent failure as described in the attached Consultation Document better facilitates the achievement of the Applicable BSC Objectives.	No
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Rationale: As per answer to no.3, a simple commercial agreement between initiating supplier, hubs and SMRA is sufficient.

Q6	Do you agree that in the case of a voluntary Supplier initiated Bulk Transfer that the costs should be borne by the initiating Supplier?	Yes
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Rationale: The answer lies to who benefits from the process, and that can only be the initiating supplier. Why should we as an SMRS be liable to any costs, when we see no benefit from the process.

Q7	Do you agree that in the case of Party Agent Failure, costs should be borne by Parties, SMRAs and Party Agents.	Yes
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² As opposed to a forced Bulk Transfer initiated as a result of Party Agent Failure.

Rationale: We believe that it is in the industry's interest that in this event, the quickest, easiest and cheapest solution is undertaken.

Q8	Do you agree with the view of the Modification Group that, provided the appropriate checks were put in place, the accuracy of data entering Settlement will not deteriorate as a result of executing a Bulk Transfer process.	Yes
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Rationale: Once the appropriate checks are in place, we believe the risk of deteriorating data entering settlements will be minimal.

Q9	Do you have any further comments to make on P63?	Yes
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Please state your comments:

1. To confirm our stance on question 6, we intend to charge the initiating supplier full costs incurred by our SMRA to support a "a voluntary Supplier initiated Bulk Transfer". We are not prepared to accept or process any CD-ROM until the initiating supplier accepts our charges, which will be billed retrospectively.
2. We will require a minimum of 4 weeks notice of any such bulk transfer, and depending upon the volume of registrations requiring update, a time period of 2 weeks to apply the changes.

P63_ASS2_003 – Northern Electric Distribution/Yorkshire Electricity Distribution

P63 ASSESSMENT CONSULTATION 2 – PRO-FORMA

Parties, Party Agents and SMRAs are invited to provide their response on the questions below.

Respondent:	Dave Young	
Responding on Behalf of	Northern Electric Distribution Ltd <u>and</u> Yorkshire Electricity Distribution plc	
Role of Respondent	SMRA & PDSO	
	Questions	YES/NO
Q1	Do you believe that the issue of Bulk Transfer of Party Agents needs to be addressed by a Modification to the Balancing and Settlement Code?	No
Rationale: As identified in 1.1 (background & scope) there is no restriction within the BSC to prevent bulk transfers of party agents.		
Q2	Do you believe that the implementation of the solution discussed by the Volume Allocation Modification Group (i.e. data transmission by CD-ROM), as outlined within the attached High Level Requirements Specification, better facilitates the achievement of the Applicable BSC Objectives?	No

Rationale: The current DTC process affords a robust solution, particularly within SMRA, and the BSC does not restrict volumes.		
Q3	If the answer to Q2 is No, do you believe that any other solution could be developed within the relevant Balancing and Settlement Code Procedures to better facilitate the Applicable BSC Objectives to address the defect identified by Modification Proposal P63?	No
If you answered Yes to Q3 then please state proposed solution: We do not believe that the current baseline is defective. There is nothing that prevents Suppliers and SMRAs agreeing sensible volumes and timescales in advance.		
Q4	The Volume Allocation Modification Group recommended that, in the case of a voluntary³ Supplier initiated Bulk Transfer of Party Agents, there should be no obligation on the Supplier to retain the relevant information within their own systems that would be required to initiate such a Bulk Transfer. Do you agree with this recommendation?	No
Rationale: What is 'relevant information'?		
Q5	Do you believe an Alternative Modification addressing Party Agent failure as described in the attached Consultation Document better facilitates the achievement of the Applicable BSC Objectives.	No
Rationale: The Supplier of Last Resort process should be resolved first.		
Q6	Do you agree that in the case of a voluntary Supplier initiated Bulk Transfer that the costs should be borne by the initiating Supplier?	N/A
Rationale: If a bilateral agreement were put in place this would form part of the discussion.		
Q7	Do you agree that in the case of Party Agent Failure, costs should be borne by Parties, SMRAs and Party Agents.	
Rationale:		
Q8	Do you agree with the view of the Modification Group that, provided the appropriate checks were put in place, the accuracy of data entering Settlement will not deteriorate as a result of executing a Bulk Transfer process.	No
Rationale: The DTC route that is used every day is robust. We feel that the suggested method is not as robust as it involves parties undertaking non-routine work. Recent experience has shown that with the most careful of co-ordination things never go as smoothly as one may wish. Eg. The migration of a <u>single</u> metering point from SMRS to CMRS took an enormous amount of effort and correspondence!		
Q9	Do you have any further comments to make on P63?	No
Please state your comments:		

³ As opposed to a forced Bulk Transfer initiated as a result of Party Agent Failure.

P63 ASSESSMENT CONSULTATION 2 – PRO-FORMA

Parties, Party Agents and SMRAs are invited to provide their response on the questions below.

Respondent:	LE Group Plc	
Responding on Behalf of	Please list all Parties responding on behalf of (including the respondent company if relevant). London Electricity Plc, SWEB Ltd, Jade Power Generation Ltd, Sutton Bridge Power Ltd, London Power Network Plc and Eastern Power Network Distribution Ltd.	
Role of Respondent	(Supplier/Data Collector/Data Aggregator/ Meter Operator Agent/SMRA/Other) Supplier, NHHDC, NHHDA, MOA and SMRA	
	Questions	YES/NO
Q1	Do you believe that the issue of Bulk Transfer of Party Agents needs to be addressed by a Modification to the Balancing and Settlement Code?	Yes
Rationale: The current BSCP process deals with CoA on an MPAN by MPAN basis, which could not be performed in a reasonable timescale via systems currently used for bulk transfer.		
Q2	Do you believe that the implementation of the solution discussed by the Volume Allocation Modification Group (i.e. data transmission by CD-ROM), as outlined within the attached High Level Requirements Specification, better facilitates the achievement of the Applicable BSC Objectives?	Yes
Rationale: Provides Suppliers and the applicable Agents with a process that is not constrained by the DTN and systems in current use. Although, further consideration should be given to SMRAs who seem content to use the DTN in performing bulk transfers.		
Q3	If the answer to Q2 is No, do you believe that any other solution could be developed within the relevant Balancing and Settlement Code Procedures to better facilitate the Applicable BSC Objectives to address the defect identified by Modification Proposal P63?	
If you answered Yes to Q3 then please state proposed solution:		
Q4	The Volume Allocation Modification Group recommended that, in the case of a voluntary⁴ Supplier initiated Bulk Transfer of Party Agents, there should be no obligation on the Supplier to retain the relevant information within their own systems that would be required to initiate such a Bulk Transfer. Do you agree with this recommendation?	No

⁴ As opposed to a forced Bulk Transfer initiated as a result of Party Agent Failure.

Rationale: The Supplier should be obliged to retain the data that it has compiled in a bulk transfer for a certain period of time to help Agents in dealing with problems and as a backup copy. The retention could be limited to a set period (e.g. three months from completion of the process) or until x percentage of the appointment transfers have been agreed as successfully completed with the participating Agent(s).

Q5	Do you believe an Alternative Modification addressing Party Agent failure as described in the attached Consultation Document better facilitates the achievement of the Applicable BSC Objectives.	Yes
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Rationale: When a Supplier makes arrangements for a bulk transfer a fairly lengthy period of planning with participating Agents, highlighted in the assessment documentation, would be required. Agent failure timescales may not allow for robust planning and the resources required to be provided within the limited timeframe. The requirement of the Supplier to hold data that could be used for bulk transfer better facilitates competition between Agents, by enabling the Supplier to perform a bulk transfer more rapidly, and would increase the efficiency of the administration this BSC process in recovering from Agent failure.

Q6	Do you agree that in the case of a voluntary Supplier initiated Bulk Transfer that the costs should be borne by the initiating Supplier?	Yes
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Rationale: Expense to Agents involved beyond normal operational costs should be borne by the Supplier initiating the process, as the additional resources, re-certification and greater working hours of the personnel involved would impact on the Agents business.

Q7	Do you agree that in the case of Party Agent Failure, costs should be borne by Parties, SMRAs and Party Agents.	No
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Rationale: It is not reasonable to expect SMRAs to bear the expense of an Agent failure, beyond costs incurred in the change of appointment and processing affected MPANs registration details. They are part of a DSO who is external to the Supplier hub.

Q8	Do you agree with the view of the Modification Group that, provided the appropriate checks were put in place, the accuracy of data entering Settlement will not deteriorate as a result of executing a Bulk Transfer process.	Yes
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Rationale: Quality should not deteriorate provided the same validation procedures are followed as in normal CoA processing. However, much greater volumes of inaccurate data will be uncovered in performing a bulk transfer that will require a period of intensive data cleansing to complete the transfer.

Q9	Do you have any further comments to make on P63?	
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Please state your comments:

1. It would be wise to wait for the ELEXON initiative on the Supplier CoA process to be completed before this modification assessment is completed to ensure related issues in the normal process that are identified can be incorporated into this modification.
2. The London Distribution SMRA has a strong preference to the use of the DTN in performing bulk transfer, as it believes that SMRA areas will not be impacted to the same degree as a the newly appointed Agent(s) (due to their having much less of the total number of MPANs per Supplier than the national number of MPANS per Supplier).
3. The provision of Liquidated Damages and compensatory payments should be waived for Agents involved in processing bulk transfers for all MPANs involved.
4. For both the Supplier initiated and Agent failure initiated bulk transfer processes LE Group would like to see a detailed process, guidance notes on performing bulk transfer and timetables for the process, which would be dependent on the number of MPANs involved in an individual bulk CoA.
5. LE Group would like ELEXON to perform and to be involved in a walkthrough procedure prior to formalisation and implementation of the modification.
6. LE Group would like to know the PAB criteria for allowing a bulk transfer.
7. LE Group would like assurance that ELEXON co-ordinate and is in agreement with the MRA.
8. This modification might need to be implemented in the Gas market at the same time, for the same reasons, now that metering is open to competition.
9. LE Group would like to be kept well consulted throughout all the stages of this modification prior to any implementation.

P63_ASS2_005 – Western Power Distribution

P63 ASSESSMENT CONSULTATION 2 – PRO-FORMA

Parties, Party Agents and SMRAs are invited to provide their response on the questions below.

Respondent:	Dave Shattock	
Responding on Behalf of	Western Power Distribution (South West) and Western Power Distribution (South Wales)	
Role of Respondent	Meter Operator Agent SMRA Distribution Business	
	Questions	YES/NO
Q1	Do you believe that the issue of Bulk Transfer of Party Agents needs to be addressed by a Modification to the Balancing and Settlement Code?	No

Rationale: There are no limitations within the current Balancing and Settlement code that restrict the ability of parties to initiate bulk change of agent activities.		
Q2	Do you believe that the implementation of the solution discussed by the Volume Allocation Modification Group (i.e. data transmission by CD-ROM), as outlined within the attached High Level Requirements Specification, better facilitates the achievement of the Applicable BSC Objectives?	No
Rationale: Existing procedures provide a tried and trusted method for change of agent. The proposal for a “big bang” transfer based on the use of CD-ROMs is a potentially high risk, high cost alternative to something that works well at the moment.		
Q3	If the answer to Q2 is No, do you believe that any other solution could be developed within the relevant Balancing and Settlement Code Procedures to better facilitate the Applicable BSC Objectives to address the defect identified by Modification Proposal P63?	No
If you answered Yes to Q3 then please state proposed solution: The current procedures adequately support the change of agent process.		
Q4	The Volume Allocation Modification Group recommended that, in the case of a voluntary⁵ Supplier initiated Bulk Transfer of Party Agents, there should be no obligation on the Supplier to retain the relevant information within their own systems that would be required to initiate such a Bulk Transfer. Do you agree with this recommendation?	No
Rationale: Current Systems, procedures and data available to all parties already support the change of agent process.		
Q5	Do you believe an Alternative Modification addressing Party Agent failure as described in the attached Consultation Document better facilitates the achievement of the Applicable BSC Objectives.	No
Rationale: The proposal seeks to amend a process which works at the moment. As such it has no positive impact on the BSC objectives.		
Q6	Do you agree that in the case of a voluntary Supplier initiated Bulk Transfer that the costs should be borne by the initiating Supplier?	N/A
Rationale: Existing procedures provide an equitable allocation of costs associated with the change of agent process.		
Q7	Do you agree that in the case of Party Agent Failure, costs should be borne by Parties, SMRAs and Party Agents.	N/A

⁵ As opposed to a forced Bulk Transfer initiated as a result of Party Agent Failure.

Rationale: The issue can only be addressed following the completion of OFGEMs review of the "Supplier of Last Resort" process.

Q8	Do you agree with the view of the Modification Group that, provided the appropriate checks were put in place, the accuracy of data entering Settlement will not deteriorate as a result of executing a Bulk Transfer process.	No
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Rationale: Existing processes provide a resilient and accurate method of data transfer between parties. The amount of work required to co-ordinate a one-off activity would far outweigh any potential benefits of such an approach.

Q9	Do you have any further comments to make on P63?	Yes
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Please state your comments: The Modification seeks to put in place a new set of activities for an area where existing processes are both effective and flexible. Parties are able, with sensible planning, to manage bulk transfer of agents in a controlled and accurate manner.

As such WPD believe the modification should go no further.

P63_ASS2_006 – SEEBOARD Energy

P63 ASSESSMENT CONSULTATION 2 – PRO-FORMA

Parties, Party Agents and SMRAs are invited to provide their response on the questions below.

Respondent:	Lucy Sanders	
Responding on Behalf of	SEEBOARD Energy	
Role of Respondent	Supplier	
	Questions	YES/NO
Q1	Do you believe that the issue of Bulk Transfer of Party Agents needs to be addressed by a Modification to the Balancing and Settlement Code?	Yes
Rationale: To ensure that everyone is in agreement as to how this is done.		
Q2	Do you believe that the implementation of the solution discussed by the Volume Allocation Modification Group (i.e. data transmission by CD-ROM), as outlined within the attached High Level Requirements Specification, better facilitates the achievement of the Applicable BSC Objectives?	NO

Rationale:		
Because of the problems involved with producing the CD ROM's. There could be a security risk in sending them.		There
Q3	If the answer to Q2 is No, do you believe that any other solution could be developed within the relevant Balancing and Settlement Code Procedures to better facilitate the Applicable BSC Objectives to address the defect identified by Modification Proposal P63?	Yes
If you answered Yes to Q3 then please state proposed solution:		
Changes made to the DTC and an obligation to determine times when such transfers are undertaken.		
Q4	The Volume Allocation Modification Group recommended that, in the case of a voluntary⁶ Supplier initiated Bulk Transfer of Party Agents, there should be no obligation on the Supplier to retain the relevant information within their own systems that would be required to initiate such a Bulk Transfer. Do you agree with this recommendation?	No
Rationale: With reference to 2.5.1 in Modification P063 Requirements Specification this information is always passed to suppliers and the supplier has a current obligation to maintain this information for a minimum of 3 years. It would seem therefore, that the supplier would have this information available for any Bulk Transfer within this period. As such, this recommendation could be considered contradictory to current practice.		
Q5	Do you believe an Alternative Modification addressing Party Agent failure as described in the attached Consultation Document better facilitates the achievement of the Applicable BSC Objectives.	Yes
Rationale: To ensure there is one process to handle all cases referred to in P63 documentation.		
Q6	Do you agree that in the case of a voluntary Supplier initiated Bulk Transfer that the costs should be borne by the initiating Supplier?	Yes
Rationale:		
Q7	Do you agree that in the case of Party Agent Failure, costs should be borne by Parties, SMRAs and Party Agents.	Yes
Rationale:		
Q8	Do you agree with the view of the Modification Group that, provided the appropriate checks were put in place, the accuracy of data entering Settlement will not deteriorate as a result of executing a Bulk Transfer process.	Yes
Rationale:		

⁶ As opposed to a forced Bulk Transfer initiated as a result of Party Agent Failure.

Q9	Do you have any further comments to make on P63?	No
Please state your comments:		

P63_ASS2_007 – Scottish and Southern Energy

This response is sent on behalf of Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd. and SSE Energy Supply Ltd.

In relation to the Assessment Consultation 2 on Modification Proposal P63, contained in your note of 20th May 2002 and the nine questions posed, our comments on the questions are as follows:-

Q1

Do you believe that the issues of Bulk Transfer of Party Agents needs to be addressed by a Modification to the Balancing and Settlement Code?

No. Rationale: There is nothing in the BSC that prevents the transfer of large volumes of MPANs between Party Agents.

Q2

Do you believe that the implementation of the solution discussed by the Volume Allocation Modification Group (i.e. data transmission by CD-ROM), as outlined within the attached High Level Requirements Specification, better facilitates the achievement of the Applicable BSC objectives?

No. Rationale: See Q1 above.

Q3

If the answer to Q2 is No, do you believe that any other solution could be developed within the relevant Balancing and Settlement Code Procedures to better facilitate the Applicable BSC Objectives to address the defect identified by Modification Proposal P63?

No

If you answered Yes to Q3 then please state proposed solution:

A solution already exists within the BSC.

Q4

The Volume Allocation Modification Group recommended that, in the case of a voluntary Supplier initiated Bulk Transfer of Party Agents, there should be no obligation on the Supplier to retain the relevant information within their own systems that would be required to initiate such a Bulk Transfer. Do you agree with this recommendation?

Rationale: What is meant by relevant information?

Q5 Do you believe an Alternative Modification addressing Party Agent failure as described in the attached Consultation Document better facilitates the achievement of the Applicable BSC Objectives?

No. Rationale: As Supplier of Last Resort has never been resolved how can Party Agent failure be resolved?

Q6 Do you agree that in the case of a voluntary Supplier initiated Bulk Transfer that the costs should be borne by the initiating Supplier?

N/A

Q7 Do you agree that in the case of Party Agent Failure, costs should be borne by Parties, SMRAs and Party Agents?

N/A

Q8 Do you agree with the view of the Modification Group that, provided the appropriate checks were put in place, the accuracy of data entering Settlement will not deteriorate as a result of executing a Bulk Transfer process?

No Rationale: What is meant by appropriate checks? There is a greater risk to the quality of data if transfer is carried out using CD-ROM rather than the current DTC process.

Q9 Do you have any further comments to make on P63?

Problems have been identified with the current Change of Agent processes that are being addressed through the Agent Appointment Expert Group. It is not appropriate to introduce another mechanism for Change of Agent until the review has been completed. Once the problems with the current processes have been resolved it will be clearer whether there is a real need for a separate mechanism for bulk Change of Agent.

Regards

Garth Graham
Scottish & Southern Energy plc

P63_ASS2_008 – Innogy

P63 ASSESSMENT CONSULTATION 2 – PRO-FORMA

Parties, Party Agents and SMRAs are invited to provide their response on the questions below.

Respondent:	Terry Ballard	
Responding on Behalf of	Innogy plc, Innogy Cogen Ltd, Innogy Cogen Trading Ltd, Npower Ltd, Npower Direct Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, and Npower Yorkshire Supply Ltd	
Role of Respondent	Supplier/Data Collector/Data Aggregator/ Meter Operator Agent/Other	
	Questions	YES/NO
Q1	Do you believe that the issue of Bulk Transfer of Party Agents needs to be addressed by a Modification to the Balancing and Settlement Code?	Yes

Rationale: The current processes only support a change of Party Agent on a one-by-one basis. Therefore, the Industry is unable to switch to better performing agents for its customers quickly due to the current restrictions in place.

Q2	Do you believe that the implementation of the solution discussed by the Volume Allocation Modification Group (i.e. data transmission by CD-ROM), as outlined within the attached High Level Requirements Specification, better facilitates the achievement of the Applicable BSC Objectives?	Yes
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Rationale: (However, please also refer to Q3). It will be much easier to deal with a bulk change of agent if all the data is received at the same time. This allows the new agent to process and update their system in the correct order and time scales. The amount of data received by the new agent will have to be sufficient enough to take on their responsibilities and produce accurate settlement data (i.e. the current requirements in BSCP504 for amount of data to be sent should suffice – but maybe with some extra clarification)

Q3	If the answer to Q2 is No, do you believe that any other solution could be developed within the relevant Balancing and Settlement Code Procedures to better facilitate the Applicable BSC Objectives to address the defect identified by Modification Proposal P63?	
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If you answered Yes to Q3 then please state proposed solution: We believe that more emphasis needs to be placed on proper testing of the processes, certification, and auditing.

Q4	The Volume Allocation Modification Group recommended that, in the case of a voluntary⁷ Supplier initiated Bulk Transfer of Party Agents, there should be no obligation on the Supplier to retain the relevant information within their own systems that would be required to initiate such a Bulk Transfer. Do you agree with this recommendation?	Please see comments
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Rationale: Although we agree in principle, it is unclear how the process would work without the Supplier holding this information. For example, a supplier may unexpectedly find themselves in a position of initiating a bulk change of agent due to unforeseen agent failure.

Therefore, a Supplier must be able to provide the data required to initiate a bulk change of agent, and send this info on to the new parties. (As a separate issue, on an agent failure this data may not be available for the failure party so there is more onus on the supplier to hold this data).

Q5	Do you believe an Alternative Modification addressing Party Agent failure as described in the attached Consultation Document better facilitates the achievement of the Applicable BSC Objectives.	No
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Rationale: This modification could be extended to accommodate agent failure as similar data is required, but a different process needs to be agreed i.e. the process should be quicker to complete in these circumstances. By ensuring that the Supplier holds enough data, it would allow the Supplier to send this information on to the new agent, therefore placing no reliance on the failed agent.

Q6	Do you agree that in the case of a voluntary Supplier initiated Bulk Transfer that the costs should be borne by the initiating Supplier?	Qualified Yes
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⁷ As opposed to a forced Bulk Transfer initiated as a result of Party Agent Failure.

Rationale: This should not include costs of elements also required for Agent failure. Division of costs between a Supplier and its Party Agents is a commercial matter that lies outside the BSC.

Q7	Do you agree that in the case of Party Agent Failure, costs should be borne by Parties, SMRAs and Party Agents.	Please see comments
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Rationale: We would wish to seek additional information before we can answer this question, i.e. what the costs actually relate to. Unavoidable (minimum) systems costs related to Old Agent roles and central systems should be paid for by the Industry (BSC Parties).

Q8	Do you agree with the view of the Modification Group that, provided the appropriate checks were put in place, the accuracy of data entering Settlement will not deteriorate as a result of executing a Bulk Transfer process.	Yes
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Rationale: Although we agree, we would like to see further details of these 'appropriate checks' and testing that needs to be undertaken, as mentioned in the high level requirement specification document. Different agents have different validation checks when processing data flows relating to applying change of agent (e.g. D155, D148, D152 etc). Therefore, data that is valid on the old agents system may not be so on the new agents, delays can occur in resolving these exceptions and setting the up the MPAN on the new party's system. An assessment of this can be obtained before the 'live' process by carrying out a trial run (as pointed out in section 2.4.2 in the High Level Requirement Spec).

Q9	Do you have any further comments to make on P63?	Yes
<p>Please state your comments:</p> <ul style="list-style-type: none"> The Requirement Specification document describes the process of passing all metering information by a CD-ROM, then for agents to create output files by way of confirmation. It would normally take agents several days to process all the relevant dataflows, therefore under the present climate, agents may struggle with the increased volumes. <p>It may be necessary to use an alternative format, with data content remaining unchanged, to ensure efficient processing of the information.</p> <ul style="list-style-type: none"> The amount of history to be sent must be more clearly specified/defined in the BSCP. In section 2.5.1 of the High Level Requirement Specification the meter reading and EAC/AA history specified under point 4 is insufficient. <u>Any meter readings sent MUST ALSO have their associated AA and EAC sent with the reading.</u> If a Supplier is sending data from their system, this may result in old data being sent to the new party e.g. MOP change a meter but before Supplier receives the D149 and D150, the Supplier send their existing (now old) meter details on to the new NHHDC. Likewise for meter readings and AA/EACs being sent to the new NHHDC which are not the most recent. Even if the Supplier collates the information from MOP and old NHHDC, by the time this data is actually send and processed by the new NHHDC it may be out of date 		

P63_ASS2_009 – British Gas Trading

Modification Proposal 63: P63 Assessment Consultation 2

Thank you for the opportunity of responding to this second Assessment Consultation on P63. British Gas would like to highlight some other areas out of the consultation not mentioned in the assessment proforma that is also attached.

Page 5 Paragraph 1.

We would like to understand the rationale behind the comment of the group in regard to “commercial arrangements within each SMRA”. VAMG were fully aware of the SMRA’s reluctance to provide little or no information regarding volumetric capacity of their systems in relation to this modification. Had SMRAs been more forthcoming and published this information, then the opportunity to discuss commercial arrangements would be possible. Additionally, the SMRA could stipulate an arbitrarily low transaction volume could be utilised at weekends. This would not address bulk transfer and lead to lengthy termination of contracts that could take years to complete. If an SMRA and Supplier cannot agree commercial arrangements there is no other SMRA or any alternative Party a Supplier could approach. We believe strongly that OFGEM should ensure that all SMRAs publish their volumes to enable a more competitive environment to be achieved and that they evaluate whether SMRS have strive towards the MRA obligation to increase there ability to transfer date according to the industry.

Page 5 paragraph 2

Further investigation into SoLR is required, particularly the use of qualified hubs where there may be multiple Suppliers wishing to simultaneously change agents in same areas. A strategy is required to ensure that there would be no complication, particularly in volumes to ensure that SoLR would always be available.

Page 6 2.2

To ensure Data Cleansing is carried out in a methodical way, the set criteria used when sending the data needs to be captured. We believe that an Agent transferring information should not transfer without considering:

1. The Importance of up-to-date data;
2. That there should be no missing Data Items
3. That there should be no cyclical meter reads carried out 7days prior to implementation;
4. That there should be no planned MO work outstanding;
5. That emergency MO work, which would need to go ahead, would require an exception process to be developed.

Page 9 2.4.2

Data Cleansing should be carried out prior to PAB approval. If a specific SMRS area exhibits poor quality data, it should be at PAB's discretion to allow other areas to proceed to Bulk Transfer.

Page 9 2.5.3

The Old Agent should not be de-appointed until confirmation has been received from the New Agent that the data on the CD-ROM has been successfully loaded and validated. This will ensure that there is no added risk to settlement.

Page 10 3.2

We believe that it may effect BSCP 502 and 503 as well.

Page 11 Annex 1

We would like clarification on a) in regard to ...stating that 'all' liabilities for completing this process successfully lie with that of the supplier. We are a little uncomfortable with the word all primarily because there may, for example, be Liquidated Damages that apply in some circumstances. These will need to be further explored at the next VAMG meeting.

High Level Requirements Specification

It is important that a specific route map with quality gates assigned is developed for Bulk Change of Agent to ensure that all back ups have been covered.

Attached are the Modification proforma and our responses as requested. Should you require any further clarification please feel free to contact me directly.

Yours faithfully

Andrew Latham
Account Manager

P63 ASSESSMENT CONSULTATION 2 – PRO-FORMA

Parties, Party Agents and SMRAs are invited to provide their response on the questions below.

Respondent:	Andrew Latham
Responding on Behalf of	British Gas Trading
Role of Respondent	

		Supplier
	Questions	YES/NO
Q1	Do you believe that the issue of Bulk Transfer of Party Agents needs to be addressed by a Modification to the Balancing and Settlement Code?	Yes
<p>Rationale: We believe that this is a fundamental and intricate issue that was not addressed by the BSC when originally written. As competition has developed the need to have a more flexible and dynamic approach is required. The BSC therefore needs to permit the timely transfer of Party Agents. This is of particular relevance at contract renewal. If this is not achieved then contract negotiation will face legal and contractual issues, especially if it were to take years to complete a transfer.</p>		
Q2	Do you believe that the implementation of the solution discussed by the Volume Allocation Modification Group (i.e. data transmission by CD-ROM), as outlined within the attached High Level Requirements Specification, better facilitates the achievement of the Applicable BSC Objectives?	Yes
<p>Rationale: CD-ROM a medium already used to transfer other data in the industry. In the MRA a contingency of using DAT tape is specified and for the Year 2002 the use of the CD-ROM was the preferred route. Therefore it is the logical and perhaps the easiest way forward. In addition, data quality would be safeguarded.</p>		
Q3	If the answer to Q2 is No, do you believe that any other solution could be developed within the relevant Balancing and Settlement Code Procedures to better facilitate the Applicable BSC Objectives to address the defect identified by Modification Proposal P63?	N/A
<p>If you answered Yes to Q3 then please state proposed solution:</p>		
Q4	The Volume Allocation Modification Group recommended that, in the case of a voluntary⁸ Supplier initiated Bulk Transfer of Party Agents, there should be no obligation on the Supplier to retain the relevant information within their own systems that would be required to initiate such a Bulk Transfer. Do you agree with this recommendation?	Yes
<p>Rationale:</p>		
Q5	Do you believe an Alternative Modification addressing Party Agent failure as described in the attached Consultation Document better facilitates the achievement of the Applicable BSC Objectives.	Yes
<p>Rationale:</p>		
Q6	Do you agree that in the case of a voluntary Supplier initiated Bulk Transfer that the costs should be borne by the initiating Supplier?	Please see attached letter.
<p>Rationale:</p>		
Q7	Do you agree that in the case of Party Agent Failure, costs should be borne by Parties, SMRAs and Party Agents.	Yes

⁸ As opposed to a forced Bulk Transfer initiated as a result of Party Agent Failure.

Rationale: We believe that all Parties have a duty where a particular party agent fails. The impact on settlement here is fundamental to the stability of the market place and as such all parties should bear the costs.

Q8	Do you agree with the view of the Modification Group that, provided the appropriate checks were put in place, the accuracy of data entering Settlement will not deteriorate as a result of executing a Bulk Transfer process.	Yes
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Rationale: As highlighted previously the use of CD-ROM in capturing a snapshot of time from one Party Agent to another settlement data will not deteriorate.

Q9	Do you have any further comments to make on P63?	Please see attached letter.
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Please state your comments:

P63_ASS2_010 – Aquila Networks (late response)

P63 ASSESSMENT CONSULTATION 2 – PRO-FORMA

Parties, Party Agents and SMRAs are invited to provide their response on the questions below.

Respondent:	Sue Pritchard
Responding on Behalf of	Aquila Networks plc (formerly GPU Power Networks (UK) plc Metering Services Ltd
Role of Respondent	MPAS Data Collector; Meter Operator Agent

	Questions	YES/NO
Q1	Do you believe that the issue of Bulk Transfer of Party Agents needs to be addressed by a Modification to the Balancing and Settlement Code?	NO

Rationale: There are no constraints existing within the BSC that would prevent the transfer of large volumes of Party Agents.

Q2	Do you believe that the implementation of the solution discussed by the Volume Allocation Modification Group (i.e. data transmission by CD-ROM), as outlined within the attached High Level Requirements Specification, better facilitates the achievement of the Applicable BSC Objectives?	NO
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Rationale: There are no constraints existing within the BSC that would prevent the transfer of large volumes of Party Agents.

Q3	If the answer to Q2 is No, do you believe that any other solution could be developed within the relevant Balancing and Settlement Code Procedures to better facilitate the Applicable BSC Objectives to address the defect identified by Modification Proposal P63?	NO
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If you answered Yes to Q3 then please state proposed solution:

No change to BSCPs is necessary. Suppliers need only agree sensible transfer volumes and timescales in advance with each relevant MPAS Service Provider.

The development time and cost required to deal with the receipt of this information via CD-Rom is excessive for a situation that would occur very rarely – MSL would only undertake the development work when the situation arose and then only where these costs might be directly recoverable.

Q4	The Volume Allocation Modification Group recommended that, in the case of a voluntary⁹ Supplier initiated Bulk Transfer of Party Agents, there should be no obligation on the Supplier to retain the relevant information within their own systems that would be required to initiate such a Bulk Transfer. Do you agree with this recommendation?	
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Rationale: If this process were to be implemented, a backup of the information would need to be retained somewhere (possibly within the suppliers systems) as a contingency measure to mitigate against the loss or damage of the CD-Rom and the data contained within it. There would also be a need to provide a clear audit trail to support the process and this could not be achieved without this data being kept by the supplier.

Q5	Do you believe an Alternative Modification addressing Party Agent failure as described in the attached Consultation Document better facilitates the achievement of the Applicable BSC Objectives.	
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Rationale: No. Bulk Transfer of failing Supplier registrations was never resolved. This should take precedence over Bulk Transfer of Agents.

Q6	Do you agree that in the case of a voluntary Supplier initiated Bulk Transfer that the costs should be borne by the initiating Supplier?	YES
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Rationale: It would be unfair to expect Supplier agents to bear the cost of a Supplier initiated change.

Q7	Do you agree that in the case of Party Agent Failure, costs should be borne by Parties, SMRAs and Party Agents.	NO
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⁹ As opposed to a forced Bulk Transfer initiated as a result of Party Agent Failure.

Rationale: MPAS Service Providers will not benefit from a change of Supplier Agents, so would not be prepared to bear any associated costs.

Provided the split was fair, costs could be shared amongst other parties, but primarily any cost should be borne by both those that will profit from the failure and those who are at greatest risk because of the failure.

Q8	Do you agree with the view of the Modification Group that, provided the appropriate checks were put in place, the accuracy of data entering Settlement will not deteriorate as a result of executing a Bulk Transfer process.	NO
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Rationale: The accuracy might not deteriorate in the case of 'voluntary' changes, but this could not be guaranteed in the case of failures as the database of the failed agents may be compromised in some way.

Q9	Do you have any further comments to make on P63?	YES
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Please state your comments:

This Modification was raised, based on the erroneous assumption that the BSC includes constraints on Change of Agent Processing. Given that it doesn't, and neither does any other governance document, we're unsure why this Mod has even continued to progress.

The VAMG issued a consultation document on this subject in March. It's our understanding that most Supplier Agents indicated in their responses that there were no significant processing constraints in their systems. I also believe that most MPAS providers responded along the lines that, although they did not wish to expose themselves to potential L.D.s by processing large numbers of CoA instructions on normal OWDs, they were prepared to undertake bulk processing over weekends by bi-lateral agreement. Again, that being the case, we're unsure why this Mod needs to progress.

The High Level Requirements Specification talks about:- changes to the way MPAS providers process CoA instructions (i.e. they would be sent and confirmed via CD-ROM rather than DTN); Qualification and Re-certification of Suppliers wishing to use the process; Application to Elexon by Suppliers wishing to undertake a bulk transfer; changes to BSCPs; etc.

This Mod suggests MPAS Providers deviating from use of the DTN, which surely affects the MRA, yet this isn't mentioned.

We would like to see the business justification for the cost of progressing this change and also the evidence that the Industry requires this change.

P63_ASS2_0011 - SP Manweb plc/ SP Transmission Ltd (late response)

P63 ASSESSMENT CONSULTATION 2 – PRO-FORMA

Parties, Party Agents and SMRAs are invited to provide their response on the questions below.

Respondent:	Man Kwong Liu	
Responding on Behalf of	Please list all Parties responding on behalf of (including the respondent company if relevant). SP Manweb plc/ SP Transmission Ltd	
Role of Respondent	(Supplier/Data Collector/Data Aggregator/ Meter Operator Agent/SMRA/Other) SMRA	
	Questions	YES/NO
Q1	Do you believe that the issue of Bulk Transfer of Party Agents needs to be addressed by a Modification to the Balancing and Settlement Code?	No.
Rationale: The BSC does not preclude bulk transfers.		
Q2	Do you believe that the implementation of the solution discussed by the Volume Allocation Modification Group (i.e. data transmission by CD-ROM), as outlined within the attached High Level Requirements Specification, better facilitates the achievement of the Applicable BSC Objectives?	No.
Rationale: This would introduce too many variables e.g. different systems and file formats. Also, in all probability, the data would be out of date by the time the CD is received. The DTN is the only method that both provides an audit trail and ensures that the data remains contemporary.		
Q3	If the answer to Q2 is No, do you believe that any other solution could be developed within the relevant Balancing and Settlement Code Procedures to better facilitate the Applicable BSC Objectives to address the defect identified by Modification Proposal P63?	No.
If you answered Yes to Q3 then please state proposed solution: The existing process should be utilised in all cases.		
Q4	The Volume Allocation Modification Group recommended that, in the case of a voluntary¹⁰ Supplier initiated Bulk Transfer of Party Agents, there should be no obligation on the Supplier to retain the relevant information within their own systems that would be required to initiate such a Bulk Transfer. Do you agree with this recommendation?	Yes.
Rationale: As at present, the relevant information should be retained by the outgoing agent, with the supplier merely adopting a co-ordinating role to ensure that the data is clean and fit for purpose.		
Q5	Do you believe an Alternative Modification addressing Party Agent failure as described in the attached Consultation Document better facilitates the achievement of the Applicable BSC Objectives.	No.
Rationale: Something could be written into the BSC for cases of party agent failure, but the process should adhere to the normal CoA process.		
Q6	Do you agree that in the case of a voluntary Supplier initiated Bulk Transfer that the costs should be borne by the initiating Supplier?	Yes.

¹⁰ As opposed to a forced Bulk Transfer initiated as a result of Party Agent Failure.

Rationale: The initiating supplier must meet any additional costs. For the avoidance of doubt the SMRA costs would include redeployment of staff, procurement of additional resources and, perhaps most significantly, system changes. These system changes might be associated with the processing of an Agent Change CD, changes to validation routines, the inhibition of DTN flows or with MPANs which perhaps have pending changes or objections or have changed supplier.		
Q7	Do you agree that in the case of Party Agent Failure, costs should be borne by Parties, SMRAs and Party Agents.	No.
Rationale: The suppliers and where possible, the agents should bear all the costs, including any additional costs incurred by the SMRAs.		
Q8	Do you agree with the view of the Modification Group that, provided the appropriate checks were put in place, the accuracy of data entering Settlement will not deteriorate as a result of executing a Bulk Transfer process.	Depends on the process.
Rationale: The accuracy of data should remain unaffected if the existing process were used for larger volumes. However it may be compromised if the wrong solution were implemented.		
Q9	Do you have any further comments to make on P63?	Yes
Please state your comments:		
The introduction of changes proposed under P63 represent a major risk to the stability of the settlement processes, a poorly thought out solution with far reaching implications - this should not be supported. Development of existing processes and transfer mechanisms must remain the way forward.		

P63_ASS2_012 - Scottish Energy Retail Ltd/Scottish Power Trading Ltd/Scottish Power Generation Ltd. / SP Dataserve (late response)

P63 ASSESSMENT CONSULTATION 2 – PRO-FORMA

Parties, Party Agents and SMRAs are invited to provide their response on the questions below.

Respondent:	James Nixon	
Responding on Behalf of	Please list all Parties responding on behalf of (including the respondent company if relevant). Scottish Energy Retail Ltd/Scottish Power Trading Ltd/Scottish Power Generation Ltd. / SP Dataserve	
Role of Respondent	(Supplier/Data Collector/Data Aggregator/ Meter Operator Agent/SMRA/Other) Supplier/Data Collector/Data Aggregator/ Meter Operator Agent/Other	
	Questions	YES/NO
Q1	Do you believe that the issue of Bulk Transfer of Party Agents needs to be addressed by a Modification to the Balancing and Settlement Code?	No.
Rationale: The BSC does not preclude bulk transfers. We are not convinced that a more effective process can be developed or that a modification is necessary.		

Q2	Do you believe that the implementation of the solution discussed by the Volume Allocation Modification Group (i.e. data transmission by CD-ROM), as outlined within the attached High Level Requirements Specification, better facilitates the achievement of the Applicable BSC Objectives?	No.
Rationale: This would introduce too many variables e.g. different systems and file formats. Also, in all probability, the data would be out of date by the time the CD is received. The DTN is the only method that both provides an audit trail and ensures that the data remains contemporary.		
Q3	If the answer to Q2 is No, do you believe that any other solution could be developed within the relevant Balancing and Settlement Code Procedures to better facilitate the Applicable BSC Objectives to address the defect identified by Modification Proposal P63?	No.
If you answered Yes to Q3 then please state proposed solution: The existing process should be utilised in all cases.		
Q4	The Volume Allocation Modification Group recommended that, in the case of a voluntary ¹¹ Supplier initiated Bulk Transfer of Party Agents, there should be no obligation on the Supplier to retain the relevant information within their own systems that would be required to initiate such a Bulk Transfer. Do you agree with this recommendation?	Yes.
Rationale: In this case there need be no change from whichever organisation holds the data now, assuming the outgoing agent will co-operate with the transfer process. However, this doesn't adequately address a case of agent failure.		
Q5	Do you believe an Alternative Modification addressing Party Agent failure as described in the attached Consultation Document better facilitates the achievement of the Applicable BSC Objectives.	Yes.
Rationale: Something could be written into the BSC for cases of party agent failure, but the process should adhere to the normal CoA process as far as possible, with the Supplier providing the data instead of the failed agent.		
Q6	Do you agree that in the case of a voluntary Supplier initiated Bulk Transfer that the costs should be borne by the initiating Supplier?	Yes.
Rationale: Other Parties should not bear the costs of the initiating Supplier's own commercial decisions.		
Q7	Do you agree that in the case of Party Agent Failure, costs should be borne by Parties, SMRAs and Party Agents.	No.
Rationale: A mechanism similar to the SoLR arrangements might be more appropriate, whereby the gaining Supplier and Agent(s) could make a representation for "reasonable" costs to Ofgem, who could direct Elexon to recover any agreed proportion from all Parties.		

¹¹ As opposed to a forced Bulk Transfer initiated as a result of Party Agent Failure.

Q8	Do you agree with the view of the Modification Group that, provided the appropriate checks were put in place, the accuracy of data entering Settlement will not deteriorate as a result of executing a Bulk Transfer process.	Depends on the process.
Rationale: The accuracy of data should remain unaffected if the existing process were used for larger volumes. However it may be compromised if the wrong solution were implemented.		
Q9	Do you have any further comments to make on P63?	None
<p>Please state your comments:</p> <p>Other initiatives, currently being progressed, would seek to further examine the change of agent / supplier processes with a view to developing possible alternatives. We would suggest that the whole agent failure / bulk transfer issue would be better addressed through this initiative than through P63.</p>		

P63_ASS2_013 – Powergen (late response)

P63 ASSESSMENT CONSULTATION 2 – PRO-FORMA

Parties, Party Agents and SMRAs are invited to provide their response on the questions below.

Respondent:	Afroze Miah	
Responding on Behalf of	Powergen UK plc, Powergen Retail Limited, Diamond Power Generation Limited and Cottam Development Centre Limited	
Role of Respondent	Supplier	
	Questions	YES/NO
Q1	Do you believe that the issue of Bulk Transfer of Party Agents needs to be addressed by a Modification to the Balancing and Settlement Code?	Yes
Rationale:		
To be effective the process needs to be structured and proceduralised. There also needs to be changes to the MRA in parallel. The Agent Transfer process needs to be managed within the MRA.		
Q2	Do you believe that the implementation of the solution discussed by the Volume Allocation Modification Group (i.e. data transmission by CD-ROM), as outlined within the attached High Level Requirements Specification, better facilitates the achievement of the Applicable BSC Objectives?	Yes
Rationale:		
It would seem to be a practical solution for the transfer of bulk data in restricted timescales to meet the BSC requirements. However, it could represent a significant impact on suppliers' and Agents' current registration systems and processes.		

Q3	If the answer to Q2 is No, do you believe that any other solution could be developed within the relevant Balancing and Settlement Code Procedures to better facilitate the Applicable BSC Objectives to address the defect identified by Modification Proposal P63?	-
If you answered Yes to Q3 then please state proposed solution: -		
Q4	The Volume Allocation Modification Group recommended that, in the case of a voluntary ¹² Supplier initiated Bulk Transfer of Party Agents, there should be no obligation on the Supplier to retain the relevant information within their own systems that would be required to initiate such a Bulk Transfer. Do you agree with this recommendation?	Yes
Rationale: This maintains the existing principle of Agent to Agent information transfer / flows.		
Q5	Do you believe an Alternative Modification addressing Party Agent failure as described in the attached Consultation Document better facilitates the achievement of the Applicable BSC Objectives.	Yes
Rationale: In principle it will achieve this. But we need a better understanding of the proposed solution and a better understanding of the impact on our systems.		
Q6	Do you agree that in the case of a voluntary Supplier initiated Bulk Transfer that the costs should be borne by the initiating Supplier?	Yes
Rationale: It would seem unreasonable that all Parties should pay where a single Supplier benefits. Therefore the initiating supplier should bear the costs where the transfer is for commercial benefit.		
Q7	Do you agree that in the case of Party Agent Failure, costs should be borne by Parties, SMRAs and Party Agents?	No
Rationale: Strictly speaking it should be No as this is a commercial risk. The costs should only be borne by the effected parties. However, we realise that such an event will effect everyone who is a NHH Supplier. There is an incentive therefore on all Parties to ensure the new Agent is appointed quickly and, it may as a result be the case that the costs should be picked up by the industry.		
Q8	Do you agree with the view of the Modification Group that, provided the appropriate checks were put in place, the accuracy of data entering Settlement will not deteriorate as a result of executing a Bulk Transfer process.	Yes

¹² As opposed to a forced Bulk Transfer initiated as a result of Party Agent Failure.

Rationale:

Provided that the necessary controls are in place and the process is robust there should be no deterioration in data quality.

Q9	Do you have any further comments to make on P63?	
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Please state your comments:

While the principles appear sound, without a detailed impact assessment on both suppliers' and Agents' registration systems, it is difficult to assess the full consequences on this modification proposal.

P63_ASS2_014 – AccuRead (late response)

P63 ASSESSMENT CONSULTATION 2 – PRO-FORMA

Parties, Party Agents and SMRAs are invited to provide their response on the questions below.

Respondent:	AccuRead Ltd	
Responding on Behalf of	Please list all Parties responding on behalf of (including the respondent company if relevant).	
Role of Respondent	(Supplier/Data Collector/Data Aggregator/ Meter Operator Agent/SMRA/Other) Data Collector and Data Aggregator	
	Questions	YES/NO
Q1	Do you believe that the issue of Bulk Transfer of Party Agents needs to be addressed by a Modification to the Balancing and Settlement Code?	YES
Rationale: Such an important issue needs to be covered by agreement of all BSC parties.		
Q2	Do you believe that the implementation of the solution discussed by the Volume Allocation Modification Group (i.e. data transmission by CD-ROM), as outlined within the attached High Level Requirements Specification, better facilitates the achievement of the Applicable BSC Objectives?	YES
Rationale: The provision of data by CD-ROM offers a reasonably quick and easy solution.		
Q3	If the answer to Q2 is No, do you believe that any other solution could be developed within the relevant Balancing and Settlement Code Procedures to better facilitate the Applicable BSC Objectives to address the defect identified by Modification Proposal P63?	Not applicable

If you answered Yes to Q3 then please state proposed solution:

Q4	The Volume Allocation Modification Group recommended that, in the case of a voluntary ¹³ Supplier initiated Bulk Transfer of Party Agents, there should be no obligation on the Supplier to retain the relevant information within their own systems that would be required to initiate such a Bulk Transfer. Do you agree with this recommendation?	NO
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Rationale: In the case of having to resubmit data it is essential that data can be backed up and restored.

Q5	Do you believe an Alternative Modification addressing Party Agent failure as described in the attached Consultation Document better facilitates the achievement of the Applicable BSC Objectives.	NO
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Rationale: We are not convinced the alternative would facilitate the transfer of data quickly enough.

Q6	Do you agree that in the case of a voluntary Supplier initiated Bulk Transfer that the costs should be borne by the initiating Supplier?	YES
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Rationale: The commercial agreements should be subject to agreement between the suppliers and agents.

Q7	Do you agree that in the case of Party Agent Failure, costs should be borne by Parties, SMRAs and Party Agents.	NO
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Rationale: The risk should be covered by the suppliers concerned, perhaps by insurance. Not all parties are affected therefore they should not share this risk.

Q8	Do you agree with the view of the Modification Group that, provided the appropriate checks were put in place, the accuracy of data entering Settlement will not deteriorate as a result of executing a Bulk Transfer process.	YES
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Rationale: There should be a dependency on the work of the CoA expert group.

Q9	Do you have any further comments to make on P63?	
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Please state your comments:

¹³ As opposed to a forced Bulk Transfer initiated as a result of Party Agent Failure.

P63 ASSESSMENT CONSULTATION 2 – PRO-FORMA

Parties, Party Agents and SMRAs are invited to provide their response on the questions below.

Respondent:	Phil Russell	
Responding on Behalf of	21 TXU BSC Parties	
Role of Respondent	Supplier	
	Questions	
Q1	Do you believe that the issue of Bulk Transfer of Party Agents needs to be addressed by a Modification to the Balancing and Settlement Code?	Yes
Rationale: It is necessary to provide a practical means of implementing commercial arrangements between Suppliers and their Agents.		
Q2	Do you believe that the implementation of the solution discussed by the Volume Allocation Modification Group (i.e. data transmission by CD-ROM), as outlined within the attached High Level Requirements Specification, better facilitates the achievement of the Applicable BSC Objectives?	Yes
Rationale: By facilitating change of Agent in Bulk, it would better achieve competition in the Supply of electricity.		
Q3	If the answer to Q2 is No, do you believe that any other solution could be developed within the relevant Balancing and Settlement Code Procedures to better facilitate the Applicable BSC Objectives to address the defect identified by Modification Proposal P63?	
If you answered Yes to Q3 then please state proposed solution:		
Q4	The Volume Allocation Modification Group recommended that, in the case of a voluntary¹⁴ Supplier initiated Bulk Transfer of Party Agents, there should be no obligation on the Supplier to retain the relevant information within their own systems that would be required to initiate such a Bulk Transfer. Do you agree with this recommendation?	Yes
Rationale: This leaves the current process unchanged but speeds up the timescales.		

¹⁴ As opposed to a forced Bulk Transfer initiated as a result of Party Agent Failure.

Q5	Do you believe an Alternative Modification addressing Party Agent failure as described in the attached Consultation Document better facilitates the achievement of the Applicable BSC Objectives.	Yes
Rationale:		
Q6	Do you agree that in the case of a voluntary Supplier initiated Bulk Transfer that the costs should be borne by the initiating Supplier?	Yes
Rationale: Because the costs are incurred as a result of the Supplier's request.		
Q7	Do you agree that in the case of Party Agent Failure, costs should be borne by Parties, SMRAs and Party Agents.	No
Rationale: If the Party Agent has gone bust it is difficult to see them paying. SMRAs are unlikely to want to pay as they just process data – it has to be the Suppliers.		
Q8	Do you agree with the view of the Modification Group that, provided the appropriate checks were put in place, the accuracy of data entering Settlement will not deteriorate as a result of executing a Bulk Transfer process.	Yes
Rationale: By definition, they have a set of data now (which quality wise may be good, bad or indifferent), P63 of itself will not change the quality, only the speed with which it percolates through the rest of the processes.		
Q9	Do you have any further comments to make on P63?	Yes
Please state your comments: Whilst we welcome the high level requirements specification there are a number of areas where we believe further detail and/or clarification is required before any such Bulk Transfer Process could be realistically implemented.		