

Responses from P68 Draft Report Consultation

Consultation issued 25 May 2002

Representations were received from the following parties:

No	Company	File Number	No. Parties Represented
1.	TXU Europe	P68_MR_001	21
2.	SEEBOARD Energy	P68_MR_002	1
3.	LE Group	P68_MR_003	6
4.	British Gas Trading	P68_MR_004	1
5.	Aquila Networks	P68_MR_005	1
6.	Scottish and Southern Energy	P68_MR_006	4
7.	Scottish Power	P68_MR_007	5
8.	Powergen	P68_MR_008	1

P68_MR_001 – TXU Europe

We confirm our support for the Report as drafted.

For 21 TXU BSC Parties

P68_MR_002 – SEEBOARD Energy

With respect to draft modification report for proposal P68 (Modification to BSC Relating to Setting Supplier Caps for use in Supplier Charges (LD) Calculation). Whilst we still agree with principles behind this modification we are disappointed that this report does not contain any estimate of materiality of financial benefits expected to accrue from this modification. Whilst costs are relatively small, when compared to other changes, there is no evidence that this modification will create a net benefit for BSC Parties beyond closing a theoretical loophole in BSC code.

Dave Morton
SEEBOARD Energy Limited

P68_MR_003 – LE Group

In response to the draft Modification report, LE Group supports the proposal to incorporate the calculation of Supplier Cap Take, which facilitates improved accuracy in determining Supplier Charges (Liquidated Damages). We believe that the implementation of this modification into the BSC will remove the manifest error that was identified in the calculation of Supplier GSP Group Cap.

This response is made on behalf of the following BSC Parties:
London Electricity plc, SWEB Ltd, Jade Power Generation Ltd, Sutton Bridge Power Ltd, London Power Networks plc and EPN Distribution Ltd.

Liz Anderson
Energy Strategy & Regulation Manager
31 May 2002

P68_MR_004 – British Gas Trading

Modification Proposal P68: Modification to the BSC relating to the setting of Caps for use in Supplier Charges (Liquidated Damages) calculation.

Thank you for the opportunity of responding to the consultation on P68. British Gas would like to confirm the Draft Modification Report does better meet BSC objectives, subject to implementation and operational costs being confirmed.

We support the proposal in replacing the Supplier Deemed Take, which can be a negative figure, with the proposed new Supplier Cap Take in the calculation of Supplier Charges (Liquidated Damages) as it will correct a minor problem. The method of calculating the Supplier Cap Take using Active Import (AI) and Unmetered Supply (UMS) data only, capped at '0', would be the best representation of what each Supplier has supplied in the month within a GSP Group.

However we are a little concerned at the implementation time especially with a system solution and would suggest that a minimum of 6 months be allowed from the Authority's decision to full implementation. This will allow time to ensure all systems are fully tested and any corrective action resolved before becoming live.

Should you wish to discuss any of the above please feel free to give me a call on the above number.

Yours faithfully

Andrew Latham
Account Manager

P68_MR_005 – Aquila Networks

Please find that Aquila Networks response to P68 Consultation on draft Modification Report is 'No Comment'.

regards
Rachael Gardener

Deregulation Control Group &
Distribution Support Office
AQUILA NETWORKS

P68_MR_006 – 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.

Further to your note of 23rd May 2002, and the associated Draft Modification Report for P68, we agree with the proposed BSC Panel recommendation to the Authority that this Modification Proposal P68 should be approved. In addition, we agree with the proposed BSC Panel recommendation on the timing for the Implementation Date, as outlined in Section 1.1 of the Modification Report.

Regards

Garth Graham

Scottish & Southern Energy plc

P68_MR_007 – Scottish Power

P68 Draft Modification Report Comments

With reference to the above, I would refer you to our previous comments on the proposal.

In this consultation response, we wish to reiterate the view, which we have previously provided in support of Mod P68: Modification to the BSC relating to the setting of Supplier Caps for use in the Supplier Charges (Liquidated Damages) calculation.

I trust that you will find these comments helpful. Nonetheless, should you require further clarification of any of the above, please do not hesitate to contact me.

Yours Sincerely,

Man Kwong Liu
Calanais Ltd.

For and on behalf of: - *Scottish Power UK Plc.; Scottish Power Energy Trading Ltd.; Scottish Power Generation Ltd.; Scottish Power Energy Retail Ltd.; SP Transmission Ltd.*

P68_MR_008 – Powergen

Laone/David,

I am happy with the above draft report and agree that the proposal should be implemented.

Regards

Paul Jones
Powergen