

March 2002

**MODIFICATION REPORT**  
**MODIFICATION PROPOSAL P60 –**  
**Amendment to Obligation to**  
**Register Metering Systems in**  
**Relation to Trade Sales**

Prepared by ELEXON on behalf of the Balancing  
and Settlement Code Panel

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1.0	18/03/02	Jason Brogden		Final Version for Authority Decision

Version	Date	Reviewer	Signature	Responsibility
0.1	18/02/02	Trading Strategy Modification Consultation		
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1.0	18/03/02	BSC Panel		
1.0	18/03/02	ELEXON Modifications		
1.0	18/03/02	Trading Strategy		

### b Distribution

Name	Organisation
Each BSC Party	Various
Each BSC Agent	Various
The Gas and Electricity Markets Authority	Ofgem
Each BSC Panel Member	Various
energywatch	Energywatch
Core Industry Document Owners	Various

### c Related Documentation

Reference	Document
Reference 1	Assessment Report Modification Proposal P60 'Amendment to Obligation to Register Metering Systems in Relation to Trade Sales' (V1.0 7 February 2002)

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## 1 SUMMARY AND RECOMMENDATIONS

### 1.1 Recommendation

On the basis of the analysis, consultation and assessment undertaken in respect of this Modification Proposal during the Assessment Procedure, and the resultant findings of this report, the BSC Panel recommends that:

**The Proposed Modification, as set out in Section 4 of this Modification Report is approved, with a 'calendar day' implementation effective from 2 Working Days after any Authority decision to approve Modification Proposal P60.**

### 1.2 Background

Modification Proposal P60 was submitted on 5 December 2001 by British Gas Trading Limited. The proposal seeks, in the circumstances of a Trade Sale to a single Replacement Supplier, to remove the obligation on the single Replacement Supplier to re-register Metering Systems and appoint Party Agents as soon as reasonably practicable and within 3 months after the Appointment Day of that Replacement Supplier. The Modification Proposal places the responsibility on the single Replacement Supplier to decide whether they can best meet their other Balancing and Settlement Code (Code) obligations by re-registering their Metering Systems or not.

The Panel endorsed the recommendation to progress Modification Proposal P60 to the Assessment Procedure (as defined in section F2.6 of the Code).

The Assessment Report for Modification Proposal P60 (Reference 1) was submitted for consideration at the Panel meeting of 14 February 2002. The Panel endorsed the recommendations of the Modification Group and agreed to submit Modification Proposal P60 to the Report Procedure, with a recommendation that the proposed modification be approved with a 'calendar day' implementation effective from 2 Working Days after any Authority decision to approve Modification Proposal P60.

The draft Modification Report, containing this provisional recommendation was consulted on, and subsequently provided to the Panel for consideration at their meeting of 14 March 2002. At that meeting, the Panel noted that there were no new, substantive arguments contained within the consultation responses, and reconfirmed their provisional recommendations to the Authority.

### 1.3 Rationale for Recommendations

It was the clear opinion of the Modification Group that this proposal protects the stability and integrity of the Trading Arrangements and that the Replacement Supplier is in the best position to make the decision as to whether they can best meet their Code obligations by re-registering their Metering Systems.

In particular, it is the consensus of opinion in consultation responses that the Modification Proposal will meet applicable objective C3(3) (d) to promote efficiency in the implementation and administration of the balancing and settlement arrangements.

The Panel supported this rationale by endorsing the Assessment Report recommendations.

## **2 INTRODUCTION**

This Report has been prepared by ELEXON Ltd., on behalf of the Balancing and Settlement Code Panel ('the Panel'), in accordance with the terms of the Balancing and Settlement Code ('BSC'). The BSC is the legal document containing the rules of the balancing mechanism and imbalance settlement process and related governance provisions. ELEXON is the company that performs the role and functions of the BSCCo, as defined in the BSC.

This Modification Report is addressed and furnished to the Gas and Electricity Markets Authority ('the Authority') and none of the facts, opinions or statements contained herein may be relied upon by any other person.

An electronic copy of this document can be found on the BSC website, at [www.elexon.co.uk](http://www.elexon.co.uk)

## **3 PURPOSE AND SCOPE OF THE REPORT**

BSC Section F sets out the procedures for progressing proposals to amend the BSC (known as 'Modification Proposals'. These include procedures for proposing, consulting on, developing, evaluating and reporting to the Authority on potential modifications. This report has been drafted in accordance with the obligations set out in Section F of the Code.

## **4 DESCRIPTION OF PROPOSED MODIFICATION**

Modification Proposal P60 seeks to improve the failing Supplier process, as described in section K7 of the Code. The impact of the Modification Proposal is to place the responsibility on the single Replacement Supplier to decide whether they can best meet their other Code obligations by re-registering their Metering Systems, or not.

The proposal states that this modification will ensure that the stability and integrity of the Supplier Volume Allocation (SVA) Trading Arrangements and Settlement data is maintained and is not unnecessarily undermined.

The issues involved in respect of a Trade Sale differ from that of the Supplier of Last Resort scenario and therefore it is proposed that the original obligation to re-register Metering Systems within 3 months will remain in place for the execution of the appointment of a Supplier of Last Resort.

The Modification Proposal states that the original obligation to re-register Metering Systems within 3 months will also remain in place where multiple Replacement Suppliers exist. This is supported by the fact that there are constraints within the existing BSC Systems that will not permit separate reporting of SVA assets by Replacement Supplier in the circumstances of multiple Replacement Suppliers.

## **5 CHANGES TO LEGAL TEXT**

One legal issue was raised from the consultation on P60 during the Assessment Procedure.

This issue related to the fact that the Replacement Supplier Registration Date is defined under paragraph K7.6. If this paragraph does not apply in the circumstances described by this Modification Proposal, then there is ambiguity introduced into paragraphs K7.4.5, K7.4.6 and K7.4.7, which use the Replacement Supplier Registration Date.

Revised legal drafting from the BSCCo's legal advisors was attached to the draft Modification Report that was subject to consultation.

A further issue on the drafting was raised from consultation on the draft Modification Report. Clarification was requested to ensure that the requirements of the Performance Assurance Framework were transferred to the Replacement Supplier in respect of all Metering Systems.

The practicalities of this transfer have now been reflected in the legal drafting proposed in Annex 2. This legal drafting has been discussed with the respondent who raised the issue in consultation and did not support the modification and they are now happy with the amended text.

## **6 LEGAL TEXT TO GIVE EFFECT TO THE PROPOSED MODIFICATION**

The legal text to give effect to Modification Proposal P60 can be found in Annex 2 of this document. Please note that this text has been modified since the Assessment Procedure and draft Modification Report consultations. The changes are described in section 5 of this document.

## **7 ASSESSMENT**

The impact of Modification Proposal P60 can be found in sections 5 to 7 of the Assessment Report. The key points are:

- A new paragraph to Section K7.6 and additions to Section K7.4.5 and Annex S-1, paragraph 1.2.1 (c) of the Code are required.
- There is no further impact on the Code, Code Subsidiary Documents or BSC Systems.
- Parties and Party Agents will no longer be required to execute a Change of Supplier process for all Metering Systems registered to the SVA Supplier ID of the Failing Supplier.

## **8 SUMMARY OF REPRESENTATIONS**

12 responses (on behalf of 53 parties) were received in response to the consultation on the draft Modification Report. In summary 9 responses supported the proposed Modification, 2 responses did not support the proposed Modification and one response was 'no comment'.

One negative respondent re-iterated comments made against the first consultation on P60. The response to these comments remain as stated in the Assessment Report.

The other negative respondent and one positive respondent sought clarification on the Performance Assurance Framework requirements described by the modification. This resolution of this issue is described above in Section 5 and is consistent with the discussion of the Modification Group.

The responses received contained no further, substantive arguments.

## ANNEX 1 – REPRESENTATIONS

### Responses from P60 Draft Modification Report Consultation

Consultation issued 25 February 2002

Representations were received from the following parties:

No	Company	File Number	No. Parties Represented
1.	Innogy Group	P60_MR_001	9
2.	LE Group	P60_MR_002	4
3.	GPU Power UK	P60_MR_003	1
4.	TXU Europe	P60_MR_004	14
5.	SEEBOARD Energy Limited	P60_MR_005	1
6.	SEEBOARD Power Networks plc	P60_MR_006	1
7.	ScottishPower UK plc	P60_MR_007	6
8.	Powergen UK plc	P60_MR_008	4
9.	Scottish & Southern Energy plc	P60_MR_009	4
10.	British Energy	P60_MR_010	3
11.	British Gas Trading	P60_MR_011	4
12.	Invensys	P60_MR_012	N/a
13.	EdF Trading	P60_MR_013	2

### **P60\_MR\_001 – Innogy Group**

Innogy Group supports the recommendation to approve this Modification.

Best regards,  
Richard Harrison  
Npower Finance - Commercial Services  
NETA & BSC Issues Manager

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### **P60\_MR\_002 – LE Group**

The LE Group supports the improvement to the failing supplier process offered in P60. We are content with the Draft Modifications Report, that you sent us on 25 February.

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

Liz Anderson  
Energy Strategy & Regulation Manager  
London Electricity Group  
28 February 2002

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### **P60\_MR\_003 – GPU Power UK**

Please find that GPU Power UK response to P60 - Amendment to Obligation to Register Metering Systems in Relation to Trade Sales is 'No Comment'.

Rachael Gardener  
Deregulation Control Group &  
Distribution Support Office  
GPU POWER.NETWORKS (UK) plc

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### **P60\_MR\_004 – TXU Europe**

14 TXU BSC Parties

We support the draft modification report conclusions and recommendations.

There is one issue which we would like to see clarified for inclusion in the final report. This relates to the application of PARMS. As the Metering Systems will be registered under the failing supplier's supplier ID we feel that it should be confirmed that the application of Serials in respect of the transferred meters will be aggregated with the other relevant data relating to the replacement supplier.

Philip Russell  
01/03/2002

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### **P60\_MR\_005 – SEEBOARD Energy Limited**

Subject: P60 Report Comments - SEEBOARD Power Networks plc

We agree with recommendation within section 1.1 of draft modification report dated 18th February 2002.

Dave Morton  
SEEBOARD

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#### **P60\_MR\_006 – SEEBOARD Power Networks plc**

Subject: P60 Report Comments - SEEBOARD Power Networks plc

We do not agree with recommendations within draft modification report. Current processes for re-registration of metering systems following a trade sale are sensible. Allowing three months for this to be completed should be long enough for this process to be completed without breaching any registration system limits. Given this leads to different registration practices we do not see how BSC objectives are being met by this proposal.

Dave Morton  
SEEBOARD

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#### **P60\_MR\_007 – ScottishPower UK plc**

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 P60: Amendment to Obligation to Register Metering Systems in Relation to Trade Sales. We believe that it meets the Applicable BSC Objectives relating to the promotion of effective competition in generation and supply and also relating to promoting efficiency in the implementation and administration of the trading arrangements.

The revised legal drafting also appears to be appropriate in terms of making explicit that the use of the term "relevant Replacement Supplier Registration Date" in K 7.4.5 and 7.4.7 is redefined for a single Transferee or, in the case of K 7.4.6, is not applicable.

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.; SP Manweb Plc; ScottishPower Energy Trading Ltd.;  
Scottish Power Generation Ltd.; Scottish Power Energy Retail Ltd.; SP Transmission Ltd.

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#### **P60\_MR\_008 – Powergen UK plc**

Please find attached our comments on the above report.

Please note that we remain concerned about the effect of the proposed changes to the extent that we have withdrawn our support for the modification.

### **P60 Report Comments - Amendment to Obligation to Register Metering Systems in Relation to Trade Sales**

I write in response to the above draft report consultation. This reply is made on behalf of Powergen UK plc, Powergen Retail Limited, Diamond Power Generation Limited, and Cottam Development Centre Limited.

We are concerned that, whilst the drafting for the modification has changed to remove the ambiguity around the effect of paragraphs K7.4.5, K7.4.6 and K7.4.7, it has not addressed the problems with the performance assurance framework which the modification creates. The effect of the new drafting is to remove many of the Replacement Supplier's obligations relating to the metering system until the metering system is re-registered to it. These obligations include the requirement to use a valid supplier hub and the requirements relating to the accuracy of data into settlement for the relevant metering systems.

This is a similar situation to that provided by the present Replacement Supplier provisions. However, under the present arrangements the effect is limited as the supplier is required to re-register the metering systems within three months. When pointing out that the original P60 drafting was at best ambiguous as to how these paragraphs would work, we suggested that the change to the legal drafting should ensure that the Replacement Supplier's obligations should be maintained in respect of all metering systems. This has not happened and instead the proposed new drafting represents a significant degradation of the performance assurance framework.

Should the modification be accepted as presently worded, a Replacement Supplier could take as long as it wished to re-register the metering systems it acquired through a relevant transfer and during the intervening period would not be required to use a valid supplier hub or to meet the accuracy of settlement data requirements of the BSC. Indeed, after the implementation of P60, this situation could, for those metering systems, carry on indefinitely and the Replacement Supplier would not be in breach of its obligations under the BSC.

As we have said previously, we do not dispute the proposer's rationale for allowing a competent Party to operate two Supplier Ids. However, the potential degradation of the performance assurance framework leads us to revise our view of whether the modification better meets the relevant BSC objectives. If the modification were to be made with the present drafting we consider that it would result in objectives c) and d) being met to a lesser extent. We do not believe that this was the proposer's intent when raising the modification. On this basis we cannot support the modification.

A solution would be to change the drafting to ensure that paragraphs K7.4.5 and K7.4.7 cease to have effect, and K7.4.6 comes back into effect, from the earlier of three months after the Replacement Supplier was appointed (the Replacement Supplier Transfer Date) or when the metering system is re-registered.

Yours sincerely,  
Paul Jones

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### **P60\_MR\_009 – Scottish & Southern Energy plc**

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 25th February 2002, and the associated Modification Report for P60, we agree with the proposed BSC Panel recommendation to the Authority that this Modification proposal P60 be approved.

Regards  
Garth Graham  
Scottish & Southern Energy plc

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#### **P60\_MR\_010 – British Energy**

We support the implementation of this modification proposal. We believe that in the circumstances where "a Lead Party transfers its interests in relation to all its BM Units (subject to paragraph 7.2.3) to a single Transferee", the BSC Objective of "promoting efficiency in the implementation and administration of the balancing and settlement arrangements" would be better met by not requiring compulsory re-registration of metering systems within 3 months of transfer.

Martin Mate  
for  
British Energy Power & Energy Trading Ltd  
British Energy Generation Ltd  
Eggborough Power Ltd

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#### **P60\_MR\_011 – British Gas Trading**

Thank you for the opportunity to respond to the Modification Report dated February 2002 on Modification Proposal P60. This response is on behalf of British Gas Trading Ltd, Accord Energy, Centrica King's Lynn and Centrica Peterborough.

We believe that P60 would better facilitate the applicable BSC Objective detailed below as highlighted in the modification report from other parties. This is further substantiated by the Panels response "who supported this rationale by endorsing the Assessment Report recommendations". There is a possibility that as the Code is currently written it could potentially destabilise settlements however P60 would allow all party members flexibility in order to better safeguard the integrity of settlements.

- Promote effective competition in the generation and supply of electricity, and (so far as consistent therewith) promote such competition in the sale and purchase of electricity.

**As the proposer of Mod P60 we fully support this and would like to confirm that the rewording of The Code as set out in Annex 2 compliments the P60 enabling all Parties to the Code to operate in a commercial environment.**

We strongly recommend that The Panel approves this Mod and that The Authority recognises the importance of P60 in the commercial environment and is swiftly implemented as discussed by the Panel on the 14<sup>th</sup> February 2002.

Should you like clarification on any of the above points please feel free to give me a call.

Yours Faithfully  
Andrew Latham

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**P60\_MR\_012 – Invensys**

NO IMPACT

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**P60\_MR\_013 – EdF Trading**

Can you please note that EDF Trading Ltd and EdF (Generation) agree with the findings as expressed in the following consultative Modification Proposal report:

P60.

The report gives appropriate and understandable justifications for the recommendations to which EDFT and EdF concur.

Steve Drummond  
EdF Energy Merchants Ltd

## ANNEX 2 – LEGAL TEXT TO GIVE EFFECT TO MODIFICATION PROPOSAL P60

The clause numbering in the following sections of this Modification Report is based on the current baseline (as at the date of this Report) and correctly reflects the intent of the Proposed and the Alternative Modification.

However, it should be noted that the clause and paragraph numbering (only) may be altered on implementation if the baseline has changed by that time, but any numbering amendments required for implementation will be documented at the time of implementation.

**Note: The following legal text has been prepared against version 4.0 of Section K and version 1.1 of Annex S1.**

### **Confirmed Version**

*Section K7.4.5. will be amended to read:*

"7.4.5 Without prejudice to the obligations of the Replacement Supplier in paragraph 7.6, a Replacement Supplier shall not be considered to be in breach of any provision of the Code relating to Metering Systems (and/or Party Agents deemed to be appointed and registered by it pursuant to paragraph 7.1.3(a)(ii)) to the extent that, during the period between the Replacement Supplier Transfer Date and the relevant Replacement Supplier Registration Date, the Replacement Supplier is unable to comply or take steps to comply with such provision by reason (only) of the fact that it is not formally registered in CMRS or SMRS (as the case may be) as the Registrant of Metering System(s) for which it is deemed to be the Registrant by virtue of paragraph 7.1.3(a)(ii), including the provisions of:

- (a) Section J5; and
- (b) Section O3.2

provided that this paragraph 7.4.5 shall not relieve the Replacement Supplier of liability under Section S3.2 and Annex S-1 in relation to such Metering Systems."

*The following new paragraph 7.6.8 shall be inserted in Section K:*

"7.6.8 In the case of a relevant transfer made pursuant to paragraph 7.2, where the Lead Party transfers its interests in relation to all its BM Units (subject to paragraph 7.2.3) to a single Transferee:

- (a) the provisions of this paragraph 7.6 shall not apply; and
- (b) in relation to a Metering System associated with the relevant Replacement Supplier BM Unit:
  - (i) the reference in paragraphs 7.4.5 and 7.4.7 to the relevant Replacement Supplier Registration Date shall be to the date (if any) with effect from which the Transferee becomes registered, for the purposes of and in accordance with the provisions of paragraph 2, in respect of such Metering System; and
  - (ii) the provisions of paragraph 7.4.6 shall not apply."

*Annex S-1, paragraph 1.2.1 shall be amended to read:*

1.2.1 In this Annex S-1, unless the context otherwise requires:

- (a) references to a Performance Level or Serial shall be to a Performance Level or (as the case may be) Serial as specified in paragraph 2 or 3 respectively;
- (b) references to a Metering System shall be to a SVA Metering System;
- (c) references to the term "for which a Supplier is responsible" when used in relation to a particular Metering System or Metering Equipment shall mean the relevant Metering System or (as the case may be) Metering Equipment in relation to which the Supplier is registered with a Supplier Meter Registration Agent including for the avoidance of doubt a Metering System for which the Supplier is treated as Registrant pursuant to Section K7.1.3(a)(ii);
- (d) references to a paragraph shall be to a paragraph of this Annex S-1;
- (e) the acronyms employed in the formulae and other algebraic expressions shall bear the respective meanings set out in Annex X-2;
- (f) the subscripts and summations used in the formulae shall bear the respective meanings set out in Annex X-2; and
- (g) references to the Menu of Supplier Charges are to paragraphs 2 and 3 of this Annex S-1.

### **Clean Version**

*Section K7.4.5. will be amended to read:*

"7.4.5 Without prejudice to the obligations of the Replacement Supplier in paragraph 7.6, a Replacement Supplier shall not be considered to be in breach of any provision of the Code relating to Metering Systems (and/or Party Agents deemed to be appointed and registered by it pursuant to paragraph 7.1.3(a)(ii)) to the extent that, during the period between the Replacement Supplier Transfer Date and the relevant Replacement Supplier Registration Date, the Replacement Supplier is unable to comply or take steps to comply with such provision by reason (only) of the fact that it is not formally registered in CMRS or SMRS (as the case may be) as the Registrant of Metering System(s) for which it is deemed to be the Registrant by virtue of paragraph 7.1.3(a)(ii), including the provisions of:

- (a) Section J5; and
- (b) Section O3.2

provided that this paragraph 7.4.5 shall not relieve the Replacement Supplier of liability under Section S3.2 and Annex S-1 in relation to such Metering Systems."

*The following new paragraph 7.6.8 shall be inserted in Section K:*

"7.6.8 In the case of a relevant transfer made pursuant to paragraph 7.2, where the Lead Party transfers its interests in relation to all its BM Units (subject to paragraph 7.2.3) to a single Transferee:

- (a) the provisions of this paragraph 7.6 shall not apply; and
- (b) in relation to a Metering System associated with the relevant Replacement Supplier BM Unit:

- (i) the reference in paragraphs 7.4.5 and 7.4.7 to the relevant Replacement Supplier Registration Date shall be to the date (if any) with effect from which the Transferee becomes registered, for the purposes of and in accordance with the provisions of paragraph 2, in respect of such Metering System; and
- (ii) the provisions of paragraph 7.4.6 shall not apply."

*Annex S-1, paragraph 1.2.1 shall be amended to read:*

1.2.1 In this Annex S-1, unless the context otherwise requires:

- (a) references to a Performance Level or Serial shall be to a Performance Level or (as the case may be) Serial as specified in paragraph 2 or 3 respectively;
- (b) references to a Metering System shall be to a SVA Metering System;
- (c) references to the term "for which a Supplier is responsible" when used in relation to a particular Metering System or Metering Equipment shall mean the relevant Metering System or (as the case may be) Metering Equipment in relation to which the Supplier is registered with a Supplier Meter Registration Agent including for the avoidance of doubt a Metering System for which the Supplier is treated as Registrant pursuant to Section K7.1.3(a)(ii);
- (d) references to a paragraph shall be to a paragraph of this Annex S-1;
- (e) the acronyms employed in the formulae and other algebraic expressions shall bear the respective meanings set out in Annex X-2;
- (f) the subscripts and summations used in the formulae shall bear the respective meanings set out in Annex X-2; and
- (g) references to the Menu of Supplier Charges are to paragraphs 2 and 3 of this Annex S-1.