

**INITIAL ASSESSMENT OF  
MODIFICATION PROPOSAL P55 -  
BSC Conflicts with Consolidation of  
Embedded Generation in Central  
Volume Allocation**

Prepared by ELEXON Limited

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## I DOCUMENT CONTROL

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1.0				

### b Distribution

Name	Organisation
BSC Panel	
BSC Parties	
BSC Agents	
The Authority	
energywatch	
Core Industry Document Owners	
BSC Website	

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## 1 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.

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

## 2 EXECUTIVE SUMMARY

Modification Proposal P55 was submitted on 30 November 2001 by SmartestEnergy. The Modification Proposal seeks to modify the BSC to address the incompatibility in Section K which currently requires that a Metering System may be registered in CMRS provided that there is not a associated Metering System existing in SMRS, and the concept of a consolidator under NETA. There is no additional impact on central software or central systems, the existing systems include the required functionality, and have been operating in the required manner since October 2001. However, care would need to be applied by the SVA Data Collector to ensure interference with the CVA data collection activities is avoided, as defined in Section 4 of this report.

It is recommended that this proposal be progressed through the Assessment Procedure, pursuant to Section F2.6 of the BSC. Currently, there is no suitable Modifications Group established to take this matter forward. It is proposed that a new Modification Group, consisting of consolidators, small generators / Suppliers and Half Hourly Data Collectors should be established to examine the Modification Proposal. In view of the work of the Consolidation Development Group, chaired by Ofgem, it is suggested that of that Group be invited to attend the Modification Group meetings.

Since the next NFPA Auction of some 200 NFFO Contracts takes place in January 2002 for implementation from 1 April 2002, the proposer has requested that Modification Proposal P55 is taken forward on an urgent basis. The Code already makes provision for the Panel to exercise discretion in these matters in special circumstances, and given that there are issues that need to be examined in detail, then it is recommended that the Proposal goes through the Assessment Procedure.

ELEXON therefore recommends that for any impacted changes in registrations following the January 2002 auction the "*special circumstances*" discretion granted to the Panel in paragraph 2.1.1 (d) in Section K of the BSC is exercised, as happened following the previous auction. This would allow Parties to carry out transfers under BSCP68, whilst remaining in line with the Code. In such circumstances consolidators would apply to the Panel for individual Metering System registrations to be transferred.

ELEXON recommends that the Assessment Period be set at two months. The Modification Group should be requested to complete and submit the Assessment Report to the Panel in time for the meeting on 14 February 2002. With the ensuing Modification Report Phase and submission to the Authority for approval, and the registration lead time for transfers of Metering Systems between SVA and CVA being ***no less than 30 Working Days*** in accordance with BSCP68, the timescales are likely to be tight for registrations with an Effective Date of 1 April 2002. Hence the reason for recommending to the Panel that the discretion is again exercised.

In ELEXON's view this is the preferred option, as opposed to the fast track approach originally requested by the proposer. This approach is acceptable to the proposer, and would facilitate registrations for 1 April 2002 onwards.

### 3 PURPOSE AND SCOPE OF THE REPORT

Section F of the BSC 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.

The BSC Panel is charged with supervising and implementing the modification procedures. ELEXON provides the secretariat and other advice, support and resource required by the Panel for this purpose. In addition, if a modification to the Code is approved or directed by the Authority, ELEXON is responsible for overseeing the implementation of that amendment (including any consequential changes to systems, procedures and documentation).

When a new proposal to modify the BSC is made, it is the responsibility of the Panel to determine how it should be progressed. Options include submitting the proposal to a Definition Procedure<sup>1</sup>, submitting it to an Assessment Procedure<sup>2</sup>, amalgamating the proposal with another proposal<sup>3</sup>, or proceeding directly to the Report Phase<sup>4</sup>. With a view to assisting the Panel in taking this decision, ELEXON prepares this initial written assessment of the implications of the Modification Proposal as soon as reasonably practicable after the proposal is made<sup>5</sup>. ELEXON endeavours to complete this initial assessment such that it can be reviewed by the Panel at the Panel meeting at which the relevant Modification Proposal is first to be considered.

This initial assessment provides a preliminary view on the following:

- the potential impact of the proposed modification on BSC systems and processes;
- the potential impact of the proposed modification on other systems and processes used by Parties;
- the potential impact of the proposed modification on the BSC, Code Subsidiary Documents and Core Industry Documents;
- the potential impact of the proposed modification on ELEXON;
- the potential impact of the proposed modification on BSC financial arrangements and budget;
- the potential impact of the proposed modification on BSC Agent contractual arrangements;
- The process and timetable that should be adopted for the progression of the Modification Proposal, in light of its complexity, importance and urgency; and
- Issues that will need to be considered and addressed in progressing the Modification Proposal (including the potential need for impact assessments, consultation and analyses).

It should be noted that, as this document only represents a preliminary assessment of the Modification Proposal, the information contained herein will, in most cases, be superseded by the subsequent analysis and reports produced by the Modification Group to which the Panel assigns the proposal for consideration.

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<sup>1</sup> see BSC F2.5

<sup>2</sup> see BSC F2.6

<sup>3</sup> see BSC F2.3

<sup>4</sup> see BSC F2.7

<sup>5</sup> see BSC F2.1.8

## 4 DETAILS OF THE MODIFICATION PROPOSAL

### 4.1 Background

ELEXON is currently acting as the Transfer Co-ordinator (under BSCP 68) for a number of sites where the Non Fossil Purchasing Agency (NFPA) has awarded Licence Exempt Generation contracts to some BSC Parties. During this transfer process ELEXON identified a conflict between the BSC Code Section K 2.1.2 and the operational requirements of a consolidator trading in Central Volume Allocation (CVA). The concept of a consolidator (Panel paper 30/029) is to acquire Export energy from a number of embedded generators, including Non Fossil Fuel sites, and aggregate the energy in a single production BMU for trading in the open market with other Suppliers. This trading arrangement requires the consolidator to register the Export Metering System in the Central Metering Registration System (CMRS).

The consolidator does not usually have a contract with the customer for the supply of demand energy for the relevant site, and may not even have a Supply Licence to provide such energy. The Supplier of the demand energy would normally register the Import Metering System in Supplier Metering Registration System (SMRS), together with all of the other demand sites for which the Supplier is responsible. It is also possible that the Non Fossil Fuel site is part of a group of sites under contract to the same Supplier. Consequently, the demand Supplier will wish to retain the Import registrations within the Supplier Volume Allocation (SMRS) Trading Arrangements. It is recognised that by using a consolidator, the benefits of trading, and entry into the NETA market can be opened to small Licence Exempt Generators, at the same time providing competitive pricing for the Export energy. It is also recognised that by opting only to trade in CVA, the consolidator will not be subject to the rigours of MRA Accreditation requirements.

Following a meeting on 25 October 2001 of a Special Expert Group (SPEG), at the instigation of the Panel, it was agreed that the drafting of the BSC had not intentionally placed a restriction on Licence Exempt Generators from trading in CVA, and that a Party should raise a Modification Proposal to remove any such barriers from the Code.

Modification Proposal P55 seeks to address the incompatibility in BSC Section K; paragraph 2.1.2 which currently requires that a Metering System may be registered in CMRS provided that there is not a associated Metering System existing in SMRS, and the concept of a consolidator under NETA. The proposal also includes a change to Section J; paragraph 4.1.6 of the BSC to cover where Outstations are solely associated with SVA Metering Systems, and a new paragraph (4.1.7) to Section J; to take account of different Data Collectors accessing the same Metering Systems. The proposal allows for the registration of Export metering at Embedded Generation sites in Central Volume Allocation (CVA), whilst the Import metering registration remains in SVA, as defined in BSCP 68: Transfer of Registration of Metering Systems between CMRS and SMRS.

It should be noted that Section K in the BSC was developed before the concept of a consolidator was envisaged. Since the Pool trading arrangements of netting Power Station generation and demand, which, by definition, required both parameters to operate in the same arrangements, no longer applies, it is not necessary under NETA for both the Imports and Exports to be registered in the same Registration System, either CRA or SMRS. The proposal requires a different Data Collector to collect the Export and Import metered volumes, and proposes a constraint on the SVA Data Collector.

The BSC documentation, as currently written, does not specifically allow two different Data Collectors accessing the same 'physical' Metering Equipment, neither does it preclude it. This raises a number of

important issues, including that in the past it has been assumed that the CVA Data Collector has priority over the SVA, and therefore has the responsibility for resetting alarm flags and resetting any time errors associated with the Outstation internal clock. The Master Registration Agreement (MRA) is also silent on this issue. Issues around more than one Data Collector having the facility to carry out the resetting, and access to Passwords also need to be explored. The potential for errors are significantly increased by multiple access to Outstations.

A copy of the Modification Proposal, as submitted by its proposer, can be found at Annex 1 to this report.

## 4.2 Proposed Changes

It is proposed in Modification Proposal P55 that Sections K and J of the BSC would need to be modified to allow, where feasible to do so, consolidators to trade Export Metering Systems at Embedded Generation Sites in Central Volume Allocation, whilst allowing the Import Metering System to remain in Supplier Volume Allocation.

The Modification Proposal suggests changes to -

- i) BSC Section K; paragraph 2.1.2;
- ii) BSC Section J; paragraph 4.1.6; and
- iii) an additional paragraph to Section J, as paragraph 4.1.7;

In addition, ELEXON considers that changes would need to be made to –

- i) CDCA Service Description; section 8.1 – to include collection of Export metered volumes at Embedded Exemptable Generating Plant;
- ii) ELEXON contract with Logica (CDCA);

and

although the Master Registration Agreement is not ELEXON's responsibility, there would be an impact on this document in respect of multiple Data Collectors accessing the same Metering Equipment.

## 5 IMPACT ON BSC SYSTEMS AND PROCESSES

BSC System / Process	Potential Impact of Proposed Modification
Registration	No impact identified
Contract Notification	No impact identified
Credit Checking	No impact identified
Balancing Mechanism Activities	No impact identified
Collection and Aggregation of Metered Data	Constraint on SVA Data Collector to not interfere with CVA data collection activities.
Supplier Volume Allocation	No impact identified
Settlement	No impact identified
Clearing, Invoicing and Payment	No impact identified
Reporting	No impact identified
Contingencies	No impact identified
Dispute Resolution	No impact identified

## 6 IMPACT ON OTHER SYSTEMS AND PROCESSES USED BY PARTIES

System / Process	Potential Impact of Proposed Modification
Parties (as consolidator)	Allows Party to trade directly in CVA

## 7 IMPACT ON DOCUMENTATION

### 7.1 Impact on Balancing and Settlement Code

BSC Section	Potential Impact of Proposed Modification
A: Parties and Participation	No impact identified
B: The Panel	No impact identified
C: BSCCo and its Subsidiaries	No impact identified
D: BSC Cost Recovery and Participation Charges	No impact identified
E: BSC Agents	No impact identified
F: Modification Procedures	No impact identified
G: Contingencies	No impact identified
H: General	No impact identified
I: Not Used	No impact identified
J: Party Agents	Changes to paragraph 4.1.6 to provide for where a Outstation or Outstations are used solely for SVA Metering Systems  And  New paragraph 4.1.7 to allow for different Data Collectors to access the same Outstation for Export (CVA) and Import (SVA) metered volumes.
K: Classification and Registration of Metering Systems and BM Units	Changes to paragraph 2.1.2 to allow Export Metering Systems at Sites with Exemptable Generation Plant to register Metering Systems in CVA, whilst allowing the Import Metering Systems to be registered in either CVA or SVA.
L: Metering	No impact identified

BSC Section	Potential Impact of Proposed Modification
M: Credit Cover and Credit Default	No impact identified
N: Clearing, Invoicing and Payment	No impact identified
O: Communications	No impact identified
P: Energy Contract Volumes and Metered Volume Reallocations	No impact identified
Q: Balancing Mechanism Activities	No impact identified
R: Collection and Aggregation of Metered Data from CVA Metering Systems	No impact identified
S: Supplier Volume Allocation	No impact identified
S: ANNEX S-1 Performance Levels and Supplier Charges	No impact identified
S: ANNEX S-2 Supplier Volume Allocation Rules	No impact identified
T: Settlement and Trading Charges	No impact identified
U: Provisions Relating to Settlement	No impact identified
V: Reporting	No impact identified
W: Trading Queries and Trading Disputes	No impact identified
X: Definitions and Interpretation	No impact identified
X: ANNEX X-1 General Glossary	No impact identified
X: ANNEX X-2 Technical Glossary	No impact identified

## 7.2 Impact on Code Subsidiary Documents

Code Subsidiary Document	Potential Impact of Proposed Modification
BSC Procedures	No impact identified
Codes of Practice	No impact identified
BSC Service Descriptions	CDCA Service Description would need to be modified to include collection of Export metered volume data from Embedded Exemptable Generating Plant
Party Service Lines	No impact identified
Data Catalogues	No impact identified
Communication Requirements Documents	No impact identified
Reporting Catalogue	No impact identified

### 7.3 Impact on Core Industry Documents

Core Industry Document	Potential Impact of Proposed Modification
Grid Code	No impact identified
MCUSA	No impact identified
Supplemental Agreements	No impact identified
Ancillary Services Agreements	No impact identified
Master Registration Agreement	Need to add reference to multiple Settlement Data Collectors accessing the same Metering Equipment
Data Transfer Services Agreement	No impact identified
British Grid Systems Agreement	No impact identified
Use of Interconnector Agreement	No impact identified
Pooling and Settlement Agreement	No impact identified
Settlement Agreement for Scotland	No impact identified
Distribution Codes	No impact identified
Distribution Use of System Agreements	No impact identified
Distribution Connection Agreements	No impact identified

## 8. IMPACT ON OTHER CONFIGURABLE ITEMS

Item	Potential Impact of Proposed Modification
	No impact identified

## 9. IMPACT ON ELEXON

Area of Business	Potential Impact of Proposed Modification
ELEXON Systems	No impact identified
ELEXON Procedures	No impact identified
ELEXON Contracts (Excluding BSC Agent Contracts)	No impact identified
Other (e.g. costs, staffing, etc.)	No impact identified

## **10. ARRANGEMENTS AND BUDGET**

## **IMPACT ON FINANCIAL**

The financial impact of this Modification Proposal has not been identified at this stage.

## 11. CONTRACTUAL ARRANGEMENTS

## IMPACT ON BSC AGENT

BSC Agent Contract	Potential Impact of Proposed Modification
Logica (BMRA, CRA, CDCA, SAA, ECVAA, TAA(CVA))	CDCA contract would need to be modified to include collection of Export metered volumes from Embedded Exemptable Generating Plant
EPFAL (FAA)	No impact identified
ESIS (TAA(SVA))	No impact identified
Cap Gemini (SVAA)	No impact identified
PwC (BSC Auditor, Certification Agent)	No impact identified
EASL (Teleswitch Agent, Profile Administrator)	No impact identified

## 12. PROCESS AND TIMETABLE FOR PROGRESSING THE PROPOSAL

ELEXON recommends that this Modification Proposal is progressed through the Assessment Procedure. The Assessment Procedure is recommended recognising that although the suggested changes to documentation are relatively small and there are no changes to central software or systems, there are process issues in respect of data collection. However, ELEXON believes that given the potential impact on other parties, including data collectors, then there is merit in a two month Assessment Phase during which the Modification Group could consider an alternative proposal. It is proposed that the Assessment Report will be submitted to the BSC Panel meeting on 14 February 2002.

### 12.1 Outline Timetable

The recommendation to provide the Assessment Report to the 14 February 2002 meeting of the BSC Panel is based on the following outline timetable. (This timetable has been prepared for planning purposes only. Meeting dates and other details are subject to confirmation by the Modification Group members).

20 December 2001	Modification Group Meeting (1) to consider content of consultation notice and Draft Assessment Report
31 December 2001	Issue consultation notice to Parties, Party Agents and Logica for consultation and HLIA
10 January 2002	Deadline for responses to consultation notice and HLIA
14 January 2001	Modification Group Meeting (2) to discuss responses, and content of Assessment Report
18 January 2002	Issue updated Assessment Report to Modifications and Legal for review
28 January 2002	Prepare Draft version of Panel paper
4 February 2002	Deadline for comments from Modification Group and Legal
5 February 2002	Incorporate comments and finalise Panel paper and Assessment Report
7 February 2002	Issue Assessment Report to Panel
14 February 2002	Panel Meeting

### 12.2 Impact Assessment Costs

Progressing the Modification Proposal will require at least one, and possibly two meetings of the Modification Group and the commissioning of impact assessments from Parties. It is believed to be of medium complexity and a budget of £30K should be established to enable progress of the Modification Proposal through the impact assessment stage.

### 12.3 Modification Group Terms of Reference

It is proposed that the Modification Group's terms of reference, include:

- i) consideration of the issues raised in the Initial Written Assessment;
  - Changes to BSC documentation
  - Technical constraints on SVA Data Collector
  - ELEXON contract with Logica (CDCA)
- ii) consultation on the proposal; and
- iii) alternative proposals / solutions, if any.

### 13. ISSUES

The following issues will need to be considered and addressed in progressing the Modification Proposal.

- Consultation with the following interested parties:
  - Licence Exempt Generators
  - Licenced Suppliers
  - Public Supplier Distribution Operators
- Consideration of technical constraints on SVA Data Collectors
- Conduct full impact assessments on the following documents:
  - BSC Code
  - Master Registration Agreement

## ANNEX 1 – MODIFICATION PROPOSAL

<b>Modification Proposal</b>	<b>MP No: 55</b> <i>(mandatory by BSCCo)</i>
<b>Title of Modification Proposal</b> <i>(mandatory by proposer):</i> BSC conflicts with consolidation of Embedded Generation in Central Volume Allocation	
<b>Submission Date</b> <i>(mandatory by proposer):</i> 30 November 2001	
<p><b>Description of Proposed Modification</b> <i>(mandatory by proposer):</i></p> <p>It is proposed that Sections K &amp; J of the BSC are modified to allow, where a technical solution exists, consolidators to register the Export Metering on Embedded Generation Sites in Central Volume Allocation whilst allowing the Import to remain in Supplier Volume Allocation.</p> <p>It is proposed that BSC Section K Para. 2.1.2 is amended to read;</p> <p>2.1.2 Without prejudice to paragraph 2.1.1, a Boundary Point Metering System may be registered in CMRS where the Metering Equipment measures quantities of Exports and/or Imports at the Site of an Exemptable Generating Plant, provided that;</p> <p>a) both Exports and Imports are registered in CMRS; Or</p> <p>b) Exports only are registered in CMRS</p> <p>It is also proposed that BSC Section J Para. 4.1.6 is amended to read;</p> <p>4.1.6 Where an Outstation or Outstations are solely associated with SVA Metering Systems at a Third Party Generating Plant is being used for the purpose of transferring data relating to both Import Active Energy and Export Active Energy:</p> <p>a) as current</p> <p>b) as current</p> <p>c) as current</p> <p>It is proposed that a Para 4.1.7 is added to section J to read;</p> <p>4.1.7 Where an Outstation or Outstations are associated with both CVA Metering System(s) and SVA Metering System(s) at a Third Party Generating Plant is being used for the purposes of transferring data relating to both Import Active Energy and Export Active Energy:</p> <p>a) the Supplier or License Exempt Generator, which is registered in CMRS shall be responsible for informing the SVA registered Supplier that the SVA Data Collector shall not interfere with the CDCA Data Collection process.</p> <p>b) as in 4.1.6 (b)</p> <p>c) the SVA registered supplier shall ensure that the Data Collector so appointed is appropriately Accredited.</p>	
<p><b>Description of Issue or Defect that Modification Proposal Seeks to Address</b> <i>(mandatory by proposer):</i></p> <p>This modification seeks to address the incompatibility in the BSC Section K Para 2.1.2, which requires that a metering system may be registered in CMRS provided that no associated metering system exists in SMRS, and</p>	

<b>Modification Proposal</b>	<b>MP No: 55</b> <i>(mandatory by BSCCo)</i>
<p>the concept of a consolidator under NETA.</p> <p>The consolidator does not necessarily have a contract with the customer for the Supply of energy to a site, and does not necessarily have a Supply Licence to provide such energy in any case.</p> <p>In some circumstances the site may form part of a group supply contract and it is likely that the supplier will require the Import Metering system to remain in SMRS.</p>	
<p><b>Impact on Code</b> <i>(optional by proposer):</i></p> <p>Sections J and K will require modification</p>	
<p><b>Impact on Core Industry Documents</b> <i>(optional by proposer):</i></p>	
<p><b>Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties</b> <i>(optional by proposer):</i></p>	
<p><b>Impact on other Configurable Items</b> <i>(optional by proposer):</i></p>	
<p><b>Justification for Proposed Modification with Reference to Applicable BSC Objectives</b> <i>(mandatory by proposer):</i></p> <p>This modification seeks to address the incompatibilities in the Code with the concept of a consolidator as identified by Ofgem and Elexon.</p> <p>It is recognised that under NETA a key avenue into the market for small and embedded generators is via a consolidator, who is able to provide them with the benefits of the NETA markets and a competitive price for their energy, comparable to that available to larger generators and portfolio players.</p> <p>Without the redrafting of this specific part of Sections K and J. many Licence Exempt Generators, in particular those that involve an element of on-site demand, are likely to find participation under NETA may be uneconomic, and in any case it will restrict their opportunities to those within the SVA Trading Arrangements, thus preventing them from providing effective competition in the generation market.</p>	
<p><b>Details of Proposer:</b></p> <p style="padding-left: 40px;"><b>Name:</b> Robert Owens</p> <p style="padding-left: 40px;"><b>Organisation:</b> SmartestEnergy</p> <p style="padding-left: 40px;"><b>Telephone Number:</b> 0207 448 0916</p> <p style="padding-left: 40px;"><b>Email Address:</b> robert-owens@smartestenergylimited.com</p>	
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<b>Modification Proposal</b>	<b>MP No: 55</b> <i>(mandatory by BSCCo)</i>
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<b>Attachments: NO</b> <b>If Yes, Title and No. of Pages of Each Attachment:</b>	