

**ASSESSMENT REPORT
MODIFICATION PROPOSAL P52
Non Party Access to the BMRS via
the High Grade Service
February 2002**

**Prepared by the Volume Allocation Modification
Group on behalf of the Balancing and Settlement
Code Panel**

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Reason for Issue Review

Author ELEXON

I DOCUMENT CONTROL

a Authorities

Version	Date	Author	Signature	Change Reference
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Version	Date	Reviewer	Signature	Responsibility
0.2	06/02/02	Volume Allocation Modification Group		Complies with Modification Group's requirements
1.0	08/02/02	Panel		For decision

b Distribution

Name	Organisation
BSC Panel	
BSC Parties	
BSC Agents	
The Authority	
National Electricity Consumers Council	
Core Industry Document Owners	
BSC Website	

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1 SUMMARY AND RECOMMENDATIONS

1.1 Recommendations

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

Proceed to the Report Phase and recommend to the Authority that the Alternative Modification Proposal be approved and that the Alternative Modification be implemented within one month of the Authority determination.

1.2 Background

Modification Proposal P52 was submitted on the 14 November 2001 by Seeboard and proposes that the High Grade Service should be made available to non Parties for access to the BMRS and that they be charged for the Service in accordance with the arrangements for Parties that are currently specified in the BSC. The Proposer believes that by allowing wider access to BMRS data, in a usable form, it will promote understanding of the operation of NETA by both potential new entrants and existing market players and therefore better facilitate effective competition.

1.3 Rationale for Recommendations

Since Go Live, ELEXON has received several enquiries from non Parties and a written application from a non Party for High Grade access to BMRS. In the interests of providing an efficient and transparent market, it seems anomalous to allow non Parties access to the BMRS via the Low Grade Service and not allow them the opportunity to pay for the enhanced performance available via the High Grade Service; in addition one non Party already has a High Grade Service as a result of action taken during the NETA Programme.

The Modification Group agreed that in light of the considerations above, the Modification Proposal would better achieve the Applicable BSC Objectives defined in Condition C3 of the Transmission Licence, particularly Condition C3(3)(c), as it would be useful in "promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity."

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.

An electronic copy of this document can be found on the BSC website, at www.elexon.co.uk

3 MODIFICATION GROUP DETAILS

This Assessment Report has been prepared by the Volume Allocation Modification Group. The Membership of the Modification Group was as follows:

Peter Davies	ELEXON (Chairman)
David McNair	ELEXON (Secretary)
Bob Brown	St Clements
Richard Harrison	Npower
Paul Jones	Powergen
Neil Magill	Scottish Power
Chris Pooley	Campbell Carr
Phil Russell	TXU
Andrew Neves	East Midlands Electricity
Katherine Bergin	SSE Energy Supply Limited
Jerome Williams	Ofgem

In Attendance:

Jan Devito	St Clements representing the Proposer's Representative Duncan Jack (St Clements Services)
Sarah Wilson	ELEXON (P52 Lead Analyst)
Richard Humphreys	ELEXON (Financial Controller)

4 DESCRIPTION AND ASSESSMENT AGAINST THE APPLICABLE BSC OBJECTIVES

4.1 The Proposed Modification

Modification Proposal P52 ('the Modification') was submitted on 14th November 2001 by SEEBOARD Energy Ltd. The Proposal seeks to grant non Parties access to the BMRS via the High Grade Service.

SEEBOARD Energy Ltd has stated that by allowing wider access to BMRS data, in a usable form, it will promote understanding of the operation of the NETA arrangements by both potential new entrants and existing market players and hence better facilitate effective competition. The Proposer identified Applicable BSC Objectives (a) to (d) of paragraph 3 of Condition 7A of the Transmission Licence as the objectives that would be better facilitated by the Modification.

4.2 Assessment against the Applicable BSC Objectives

The Volume Allocation Modification Group considered Modification Proposal P52 at its meeting on 6 February 2002. In particular the Modification Group considered whether the Modification Proposal would better facilitate the Applicable BSC Objectives. The Applicable BSC Objectives are set out in paragraph 3 of Condition C3 of the Transmission Licence and are as follows:

- (a) The efficient discharge by the Transmission Company of the obligations imposed under the Transmission Licence;
- (b) The efficient, economic and co-ordinated operation by the Transmission Company of the Transmission System;
- (c) Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity;
- (d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.

The Modification Group felt that implementation of the Modification Proposal would allow wider access to BMRS data promoting a better understanding of the NETA operational arrangements by the existence of third party data analysis services. Such third party providers would be better able to provide timely services using the High Grade Service, this in turn may facilitate increased competition in both the generation and supply of electricity. Further in the interests of providing an efficient and transparent market, it seems anomalous to allow non Parties access to the BMRS via the Low Grade Service and not allow them the opportunity to pay for the enhanced performance available via the High Grade Service. In the Modification Group's view, these improvements would better facilitate the Applicable BSC Objectives in that it met the objective of "promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity".

4.3 Alternative Modification

The Modification Group considered other possible alternative solutions to the issues raised by P052, and agreed that an Alternative Modification should be progressed which would include a one off Administration charge to non Parties to cover the costs incurred by ELEXON, and otherwise funded by Parties, for the initial set-up of processing the non Parties' application for the High Grade Service. The Group proposed that this fee should be set at £250, as a one off payment by non Parties (to be invoiced in advance) in addition to the Specified BSC Charges set out in Annex D3 of the BSC (to be invoiced monthly in advance). This would ensure that the charging arrangements for non Parties were of a more cost reflective nature and equivalent to that of Parties who currently pay for the High Grade Service, the charges as specified in Annex D3 of the Code, and contributions to ELEXON's overheads through their Section D invoices. Specifically this administration fee would cover the additional activity undertaken by the BSCCo Commercial Services Department in ensuring that the necessary contractual and commercial terms were in place prior to ELEXON placing the order for the High Grade Service. The Group at its meeting

also considered the need for non Parties to participate in Qualification Testing but decided that the File Transfer Protocol (FTP) testing would be sufficient to test connectivity of the High Grade Service.

The Group considered the principles of the Modification Proposal and felt that it provided the ability to make BMRS data available in a potentially more useful form rather than the analogy that non Parties were being given the ability to “cherry pick” services. In terms of the benefit of being a Party the Group concluded that only a subset of BSC data would be available to non Parties so in this respect there is benefit in being a Party. The second is the assertion that access to the High Grade Service should only be made available to Parties, the Group felt that the rights and benefits of being a Party were primarily regarding the ability to Trade Electricity and receive reports and not about the technical means of transferring data. With respect to the level of Service the group felt that non Parties should be given the same level of service as provided to Parties remembering that the level of service is currently based on service availability.

5 IMPACT ON BSC AND BSCCO DOCUMENTATION

5.1 BSC

BSC Section V would need a variation to allow access to third parties to the High Grade Service and provide for related charging provisions in accordance with the relevant specified charges set out in paragraph 3.1 of Annex D-3 to Section D of the BSC. BSC Section D would also need a variation to capture the £250 Administration fee payable by non Parties should the Panel approve the Alternative Modification.

5.2 Code Subsidiary Documents

Communications Requirements Documents would need to be amended to reflect wider distribution of BMRS Data. A change to the Reporting catalogue to reflect wider distribution of BMRS Data would also be required.

5.3 BSCCo Memorandum and Articles of Association

No changes have been identified.

6 IMPACT ON BSC SYSTEMS

6.1 Registration

No impact identified.

6.2 Contract Notification

No impact identified.

6.3 Credit Checking Systems

No impact identified.

6.4 Balancing Mechanism Activities

The BMRA will ensure that non Party access is limited to receipt of BMRA data through the assignment of a new Role Code which will uniquely identify the non Party. It should be noted that unless a substantial number of non Parties request this service the current level of availability to Parties will not be impacted.

6.5 Collection and Aggregation of Metered Data

No impact identified.

6.6 Supplier Volume Allocation

No impact identified.

6.7 Settlement

No impact identified.

6.8 Clearing, Invoicing and Payment

No impact identified.

6.9 Reporting

No impact identified.

7 IMPACT ON CORE INDUSTRY DOCUMENTS AND SUPPORTING ARRANGEMENTS

7.1 Grid Code

No impact identified.

7.2 Master Connection and Use of System Agreement (MCUSA) No impact has been identified.

No impact identified.

7.3 Supplemental Agreements No impact has been identified.

No impact identified.

7.4 Ancillary Services Agreements (ASAs)

No impact identified.

7.5 Master Registration Agreement (MRA)

No impact identified.

7.6 Data Transfer Services Agreement (DTSA)

No impact identified.

7.7 British Grid Systems Agreement (BGSA)

No impact identified.

7.8 Use of Interconnector Agreement

No impact identified.

7.9 Pooling and Settlement Agreement (PSA)

No impact identified.

7.10 Settlement Agreement for Scotland (SAS)

No impact identified.

7.11 Distribution Codes

No impact identified.

7.12 Distribution Use of System Agreements (DUoSAs)

No impact identified.

7.13 Distribution Connection Agreements

No impact identified.

8 IMPACT ON ELEXON

Finance Department – Changes to ELEXON accounting procedures would be required associated with invoicing and credit management systems.

Commercial Services – If non Parties are given access to the High Grade Service a contract (implemented using standard purchase terms drafted by ELEXON) would be required between the non Party and ELEXON to define the payment terms for the High Grade Service and it should also make reference to the BMRS licence, limits of liability, warranties and a definition of the service to be provided.

The Group considered the likely increase or decrease in BSC Costs in consequence of the Modification and concluded that the Modification Proposal would not be likely to lead to a significant increase in BSC Costs.

9 IMPACT ON PARTIES AND PARTY AGENTS

9.1 Parties

No impact identified.

9.2 Party Agents

No impact identified.

10 LEGAL ISSUES

There are no legal issues associated with this Modification Proposal.

11 SUMMARY OF REPRESENTATIONS

This section summarises the responses to the consultation and impact assessment. Copies of the detailed responses are included in Annex 7.

Nine responses representing forty-two Parties were received to the consultation. Of these responses, eight representing thirty-eight Parties supported implementation of the Modification Proposal. This support was on the basis that the Modification Proposal would promote effective competition in the generation and supply of electricity and promote efficiency in the implementation and administration of the BSC.

One response, representing four Parties, opposed the Modification Proposal. The response questioned the point of being a full BSC Party member if others could “cherry pick” what services they take. The response further states that there should be a clear “benefit” of being a full member, including having access to the High Grade Service. The response was not advocating that non Parties be denied access to information, which they can obtain via the Low Grade Service, rather that they are not given special treatment.

12 PROJECT BRIEF

No Project Brief has been prepared as no software changes to BSC Systems will be required.

ANNEX 1 – PROPOSED TEXT TO MODIFY THE BSC

Not currently drafted.

ANNEX 2 – PROPOSED TEXT TO MODIFY BSCCO MEMORANDUM AND ARTICLES OF ASSOCIATION

No change required.

ANNEX 3 – BSC AGENT IMPACT ASSESSMENTS

No impact assessments were requested from BSC Agents.

The NETA Central Services Agent has not provided impact assessments as it is considered that there is no impact on the Central Systems. However the NETA Central Services Agent has confirmed that should a non Party wish to obtain BMRS data using a High Grade Service then it shall be able to do so as a BSC Service User under the terms of the NETA Programme Services Agreement assuming that such a user shall only have access to BMRS data. In addition it has confirmed that the provisions of the TIBCO Software Licence and Maintenance Agreement allow for a non Party to use the relevant TIBCO Products provided such use is in conjunction with the NETA System. The actual formal request for the High Grade Service would be made directly to ELEXON by the requesting non Party.

ANNEX 4 – CORE INDUSTRY DOCUMENT IMPACT ASSESSMENTS

No impact assessments were received from Core Industry Document holders.

ANNEX 5 – TRANSMISSION COMPANY ANALYSIS

No impact assessments were received from Core Industry Document holders.

ANNEX 6 – TERMS OF REFERENCE AND REPORT/ANALYSIS OF EXTERNAL CONSULTANTS/ADVISERS

No report or analysis was requested or received from external consultants or advisers.

ANNEX 7 – RESPONSES TO CONSULTATION AND IMPACT ASSESSMENT

Responses from P52 Assessment Consultation

Consultation issued 15 January 2002

Summary of Responses to First Consultation

In response to the first consultation, below is a summary of the responses, which have been received.

No	Company	File Number	No. Parties Represented
1.	TXU	P52_ASS_001	13

2.	Campbell Carr	P52_ASS_002	N/A
3.	EdF Energy Merchants Ltd	P52_ASS_003	2
4.	Scottish & Southern Energy plc	P52_ASS_004	4
5.	LE Group	P52_ASS_005	5
6.	SEEBOARD	P52_ASS_006	2
7.	Innogy plc	P52_ASS_007	6
8.	ScottishPower Energy Trading Ltd	P52_ASS_008	7
9.	British Energy	P52_ASS_009	3
Totals			42

Matrix of Responses to First Consultation

Below is a matrix of the key comments which have arisen in relation to the seven questions which were included in the P052 Consultation Paper:

No	Company	Agree with Principles	BSC Objective	Same Level of Service as Parties	Charges in accordance with Section D	Qualification Tests	Potential material benefits to your organisation/industry	Other Issues
1.	TXU	Yes	Yes	Yes	Yes	No	None	None
2.	Campbell Carr	Yes	Yes	Yes	No	No	Unable to comment	No
3.	EdF Energy Merchants Ltd	Yes	Yes	Yes	Yes	Yes	More informed participants in the market	Does not result in a denigration of the HGS to Parties
4.	Scottish & Southern Energy plc	No	No	No	Yes – if given access	Yes – if given access	No Comment	No
5.	LE Group	Yes	Yes	Yes	Yes	No	Improved information	No
6.	SEEBOARD	Yes	Yes	Yes	Yes	Appear unnecessary	New analysis of BMRS data and a better understanding of NETA Operational arrangements	No
7.	Innogy plc	Yes	Yes	Yes	Yes	Yes	Efficient dissemination of data therefore allowing third parties to provide information services to industry	No
8.	ScottishPower Energy Trading Ltd	Yes	Yes	Yes	Yes	Yes	Non Party using BM data to provide a value added services	No
9.	British Energy	Yes	Yes	No	Should contribute to all costs	Yes	Increased transparency	No

P52_ASS_001 – TXU

Name: Phil Russell

Organisation: TXU

Response Provided on behalf of (BSC Parties): 13 TXU companies

Please note that YES, NO answers are requested for clarity, however, the reasoning behind these responses is also sought to enable a greater understanding of the issues and opinions.

No.	Question	Response
1	Do you agree with the principles behind P052 i.e. Access to non Parties of BMRS Data via the High Grade Service?	<p>Yes</p> <p>Comments: The whole point of BMRS is that it is available to non BSC Parties. Restricting their access to this to the Website developed by the Central Service Provider is exceedingly inefficient at best.</p>
2	Do you believe that P052 better facilitates the Applicable BSC Objectives, as defined in the Transmission Licence Condition 7A paragraph (3)? If so, which BSC Objective(s) and how?	<p>Yes</p> <p>Comments: It improves the administrative efficiency of implementing the balancing and settlement arrangements (BSC)</p>
3	Do you believe that the same level of service should be given to non Parties as is given to Parties? If so, why?	<p>Yes (at least to the question we think that you are trying to ask)</p> <p>Comments: The same data is made available to Parties and Non BSC Parties, but for reasons which we do not understand, the Website design which is all that is practically available to non BSC Parties is limited in its usefulness.</p>

No.	Question	Response
4	Do you agree that non Parties should be charged in accordance with section D (BSC Cost Recovery and Participation Charges) as Parties currently are?	Yes Comments: This provides equitable treatment between BSC and Non BSC Parties.
5	Do you think that non Parties should be required to participate in Qualification tests?	No Comments: If they do not get the data they want that is their problem.
6	What are the potential material benefits of implementing P052: <ul style="list-style-type: none"> ▪ to your organisation? ▪ to the industry? 	Comments: None and None (the benefit is to non BSC Parties)
7	Does the Modification Proposal raise any other issues that should be considered as part of the Assessment Procedure?	No

Please see our response to the P52 consultation. This is from Campbell Carr as an interested non Party and we are not representing any one Party in this case.

Name: Mike Sandford

Organisation: Campbell Carr

Response Provided on behalf of (BSC Parties): N/A

Please note that YES, NO answers are requested for clarity, however, the reasoning behind these responses is also sought to enable a greater understanding of the issues and opinions.

No.	Question	Response
1.	Do you agree with the principles behind P052 i.e. Access to non Parties of BMRS Data via the High Grade Service?	<p>Yes</p> <p>Comments:</p> <p>The provision of the HGS to non Parties allows for the effective provision of raw data to those organisations best placed to provide the IT intensive storage and analysis which the market needs.</p>
2.	Do you believe that P052 better facilitates the Applicable BSC Objectives, as defined in the Transmission Licence Condition 7A paragraph (3)? If so, which BSC Objective(s) and how?	<p>Yes</p> <p>Comments:</p> <p>This modification specifically supports objectives c and d. Competition and efficiency are supported by the existence of third party data analysis services. These third party providers are better able to provide timely services using the HGS.</p>
3.	Do you believe that the same level of service should be given to non Parties as is given to Parties? If so, why?	<p>Yes</p> <p>Comments:</p> <p>If non Parties are providing a service which is to genuinely support competition then it must be based on full and timely raw data provision. If a third party service is restricted in some way then the users of that service may lose opportunities. For example, if a third party is, in effect, providing IT resources to a group of customers who would be unable to provide those resources for themselves individually, any reduction in service would bias the market in favour of larger Parties who could provide the equivalent resources in-house.</p>
4.	Do you agree that non Parties should be charged in accordance with section D (BSC Cost Recovery and Participation Charges) as Parties currently are?	<p>No</p> <p>Comments:</p> <p>Non-parties are not subject to the BSC and section D cannot apply. However, the contract which Elexon offers</p>

No.	Question	Response
		non Parties should address the same conditions of use, and have similar pricing, to those underlying both section D and section O.
5.	Do you think that non Parties should be required to participate in Qualification tests?	<p>No</p> <p>Comments:</p> <p>Non-parties are not subject to the BSC and section O cannot apply. However, the contract which Elexon offers non Parties should address the risks associated with access to central systems and may be based on similar principles to those underlying the Qualification tests.</p> <p>One central principle is that testing is independent of whether the LGS or HGS is used, and therefore the question of testing is outside the scope of this modification. Any testing requirements should be specified in relation to the data being transferred and should be considered with any modification which makes that data available to a non Party.</p> <p>Installation testing would be expected to be part of the installation process and would be defined in the relevant contract.</p>
6.	<p>What are the potential material benefits of implementing P052:</p> <ul style="list-style-type: none"> ▪ to your organisation? ▪ to the industry? 	<p>Comments:</p> <p>We are unable to comment on the material benefits to Parties as Parties are responsible for making the their own use of whatever services are provided.</p>
7.	Does the Modification Proposal raise any other issues that should be considered as part of the Assessment Procedure?	<p>No</p> <p>Comments:</p> <p>The proposal is about provision of a data transport service. The main issues are, therefore, about service levels and conditions of use. These issues have been addressed by questions 3, 4 and 5 above and relate to the nature of the contract which Elexon would ask non Parties to take up.</p>

P52_ASS_003 – EdF Energy Merchants Ltd

Name: Steve Drummond

Organisation: EdF Energy Merchants Ltd

Response Provided on behalf of (BSC Parties): EdF and EdFT Ltd

Please note that YES, NO answers are requested for clarity, however, the reasoning behind these responses is also sought to enable a greater understanding of the issues and opinions.

No.	Question	Response
1.	Do you agree with the principles behind P052 i.e. Access to non Parties of BMRS Data via the High Grade Service?	Yes Comments:
2.	Do you believe that P052 better facilitates the Applicable BSC Objectives, as defined in the Transmission Licence Condition 7A paragraph (3)? If so, which BSC Objective(s) and how?	Yes Comments: Objective (c) is better facilitated albeit weakly
3.	Do you believe that the same level of service should be given to non Parties as is given to Parties? If so, why?	Yes Comments: In the belief that it will aid understanding, provide transparency and may give non-parties the required information that helps them decide whether to become parties or not.
4.	Do you agree that non Parties should be charged in accordance with section D (BSC Cost Recovery and Participation Charges) as Parties currently are?	Yes Comments: This has to be a pre-condition to avoid any claims of discrimination.

No.	Question	Response
5.	Do you think that non Parties should be required to participate in Qualification tests?	Yes Comments: Absolutely, for the same reason as above.
6.	What are the potential material benefits of implementing P052: <ul style="list-style-type: none"> ▪ to your organisation? ▪ to the industry? 	Comments: <ul style="list-style-type: none"> - None to our organisation - Potentially more informed participants in the market
7.	Does the Modification Proposal raise any other issues that should be considered as part of the Assessment Procedure?	Yes Comments: It is also vital that provision of access to these additional parties does not result in a denigration of the High Grade service. This too is a pre-condition.

P52_ASS_004 – Scottish & Southern Energy plc

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

In relation to the seven questions listed in Appendix I of your note of 15th January 2002 concerning Modification P52, our comments are as follows:

- Q1 No
- Q2 No

Q3 No

Q4 If they are given access then Yes they should be charged.

Q5 If they are given access then Yes they should qualify.

Q6 No comment

Q7 No.

We have been guided, in coming to these answers by our thoughts on the principle noted in Question 3 - what is the point of being a full BSC Party member if others can freely cherry pick what services they take (all be it they pay the costs for these services), but avoid the 'ancillary' costs paid by all full members. In essence there should be a clear 'benefit' of being a full member, including having access to the High Grade Service. We are not advocating that Non BSC Parties be denied access to information, which they can obtain via the Low Grade Service, rather that they are not given special treatment. We also note this particular Modification is one of a number of similar Modifications that seeks to 'offer' Non BSC Parties access to services which are currently only available to Full BSC Parties.

Name: Garth Graham

Organisation: Scottish & Southern Energy plc

Response Provided on behalf of (BSC Parties): Scottish and Southern Energy plc, Southern Electric, Keadby Generation Ltd. and SSE Energy Supply Ltd.

Please note that YES, NO answers are requested for clarity, however, the reasoning behind these responses is also sought to enable a greater understanding of the issues and opinions.

No.	Question	Response
1.	Do you agree with the principles behind P052 i.e. Access to non Parties of BMRS Data via the High Grade Service?	Yes / No Comments:
2.	Do you believe that P052 better facilitates the Applicable BSC Objectives, as defined in the Transmission Licence Condition 7A paragraph (3)? If so, which BSC Objective(s) and how?	Yes / No Comments:

No.	Question	Response
3.	Do you believe that the same level of service should be given to non Parties as is given to Parties? If so, why?	Yes / No Comments:
4.	Do you agree that non Parties should be charged in accordance with section D (BSC Cost Recovery and Participation Charges) as Parties currently are?	Yes / No Comments:
5.	Do you think that non Parties should be required to participate in Qualification tests?	Yes / No Comments:
6.	<p>What are the potential material benefits of implementing P052:</p> <ul style="list-style-type: none"> ▪ to your organisation? ▪ to the industry? 	Comments:

No.	Question	Response
7.	Does the Modification Proposal raise any other issues that should be considered as part of the Assessment Procedure?	Yes / No Comments:

P52_ASS_005 – LE Group

Name: Liz Anderson

Organisation: LE Group

Response Provided on behalf of (BSC Parties): London Electricity plc, South Western Electricity, Sutton Bridge Power, Jade Power and TXU Europe West Burton Ltd

Please note that YES, NO answers are requested for clarity, however, the reasoning behind these responses is also sought to enable a greater understanding of the issues and opinions.

No.	Question	Response
1.	Do you agree with the principles behind P052 i.e. Access to non Parties of BMRS Data via the High Grade Service?	Yes Comments: Wider access to data increases understanding of the industry
2.	Do you believe that P052 better facilitates the Applicable BSC Objectives, as defined in the Transmission Licence Condition 7A paragraph (3)? If so, which BSC Objective(s) and how?	Yes Comments: P52 enhances objective 7A(3)(c) as increased information may facilitate increased competition in both the generation and supply of electricity

No.	Question	Response
3.	Do you believe that the same level of service should be given to non Parties as is given to Parties? If so, why?	<p>Yes</p> <p>Comments: Provided non-parties pay the same fee they should receive the same service. This should only apply to BMRA data – safeguards should be put in place to ensure this is the only data they receive.</p>
4.	Do you agree that non Parties should be charged in accordance with section D (BSC Cost Recovery and Participation Charges) as Parties currently are?	<p>Yes</p> <p>Comments: It is generally preferable for those who subscribe to a service to contribute towards the set-up costs as well as the running costs. In this case it may be acceptable to be charged just the costs in section D as the set-up costs may be small and it will be simpler to administer.</p>
5.	Do you think that non Parties should be required to participate in Qualification tests?	<p>No</p>
6.	<p>What are the potential material benefits of implementing P052:</p> <ul style="list-style-type: none"> ▪ to your organisation? ▪ to the industry? 	<p>Comments: As a BSC Party this would have little impact on our organisation.</p> <p>It would open up the industry to non-parties through improved information thus increasing the potential levels of competition.</p>
7.	Does the Modification Proposal raise any other issues that should be considered as part of the Assessment Procedure?	<p>No</p>

P52_ASS_006 – SEEBOARD

Name: Dave Morton

Organisation: SEEBOARD

Response Provided on behalf of (BSC Parties): SEEBOARD Energy Limited and SEEBOARD Power Networks plc

Please note that YES, NO answers are requested for clarity, however, the reasoning behind these responses is also sought to enable a greater understanding of the issues and opinions.

No.	Question	Response
1.	Do you agree with the principles behind P052 i.e. Access to non Parties of BMRS Data via the High Grade Service?	<p>Yes</p> <p>Comments:</p>
2.	Do you believe that P052 better facilitates the Applicable BSC Objectives, as defined in the Transmission Licence Condition 7A paragraph (3)? If so, which BSC Objective(s) and how?	<p>Yes</p> <p>Comments:</p> <p>Allowing wider access to BMRS data, in a usable form, will promote understanding of NETA operational arrangements by both potential new entrants and existing market players and hence better facilitate effective competition.</p>
3.	Do you believe that the same level of service should be given to non Parties as is given to Parties? If so, why?	<p>Comments:</p> <p>On the assumption that non Parties will be charged the same as Parties then they should expect a similar level of service.</p> <p>The modification group should determine if a number of non party users could place any significant strain on existing support arrangements and formulate detailed proposals accordingly.</p>
4.	Do you agree that non Parties should be charged in accordance with section D (BSC Cost Recovery and Participation Charges) as Parties currently are?	<p>Yes</p> <p>Comments:</p>

No.	Question	Response
5.	Do you think that non Parties should be required to participate in Qualification tests?	<p>Comments:</p> <p>The Modification Group should determine if there is any risk that a new party, connecting to BMRS for the first time, could adversely impact this service in some way.</p> <p>Qualification tests appear unnecessary since non parties will not be sending data flows to the Central Service Provider. They may also be impractical since to our knowledge there is no test system for the BMRS.</p>
6.	<p>What are the potential material benefits of implementing P052:</p> <ul style="list-style-type: none"> ▪ to your organisation? ▪ to the industry? 	<p>Comments:</p> <p>Some non parties will offer new services based on their analysis of the BMRS data which we expect to benefit from.</p> <p>Allowing wider access to BMRS data, in a usable form, will promote understanding of NETA operational arrangements by both potential new entrants and existing market players and hence better facilitate effective competition.</p>
7.	Does the Modification Proposal raise any other issues that should be considered as part of the Assessment Procedure?	<p>No</p> <p>Comments:</p>

P52_ASS_007 – Innogy plc

Name: Terry Ballard

Organisation: Innogy plc

Response Provided on behalf of (BSC Parties): Innogy, Innogy Cogen Ltd, Innogy Cogen Trading Ltd, Npower Ltd, Npower (Northern Ltd), Npower (Yorkshire) Ltd.

Please note that YES, NO answers are requested for clarity, however, the reasoning behind these responses is also sought to enable a greater understanding of the issues and opinions.

No.	Question	Response
1.	Do you agree with the principles behind P052 i.e. Access to non Parties of BMRS Data via the High Grade Service?	<p>Yes</p> <p>Comments:</p> <p>It better facilitates the BSC Applicable Objectives.</p>
2.	Do you believe that P052 better facilitates the Applicable BSC Objectives, as defined in the Transmission Licence Condition 7A paragraph (3)? If so, which BSC Objective(s) and how?	<p>Yes</p> <p>Comments:</p> <p>It may help promote effective competition in the generation and supply of electricity etc. by increasing access to information.</p>
3.	Do you believe that the same level of service should be given to non Parties as is given to Parties? If so, why?	<p>Yes</p> <p>Comments:</p> <p>It is generally in the interest of the market.</p>
4.	Do you agree that non Parties should be charged in accordance with section D (BSC Cost Recovery and Participation Charges) as Parties currently are?	<p>Yes</p> <p>Comments:</p>

No.	Question	Response
5.	Do you think that non Parties should be required to participate in Qualification tests?	Yes Comments: Elexon should identify the relevant sub-set of tests. These should be completed by non Parties. It is essential that Central Systems are not jeopardised by the actions of others.
6.	What are the potential material benefits of implementing P052: <ul style="list-style-type: none"> ▪ to your organisation? ▪ to the industry? 	Comments: No direct advantages to my organisation. Allows more efficient dissemination of data. This will allow 3 rd parties to provided information services to industry.
7.	Does the Modification Proposal raise any other issues that should be considered as part of the Assessment Procedure?	No Comments:

P52_ASS_008 – ScottishPower Energy Trading Ltd

Name: Abid Sheikh

Organisation: ScottishPower Energy Trading Ltd

Response Provided on behalf of (BSC Parties): ScottishPower Generation Ltd., ScottishPower Energy Trading Ltd., ScottishPower Transmission Ltd., ScottishPower Energy Retail Ltd., ScottishPower UK plc, ScottishPower Manweb plc, Emerald Power Generation Ltd.

Please note that YES, NO answers are requested for clarity, however, the reasoning behind these responses is also sought to enable a greater understanding of the issues and opinions.

No.	Question	Response
1.	Do you agree with the principles behind P052 i.e. Access to non Parties of BMRS Data via the High Grade Service?	<p>Yes</p> <p>Comments: It is sensible to allow access to BM data to those non Parties who either wish to provide a value added service to BSC Parties in respect of that data, or wish to use that data as a potential new entrant to the trading arrangements. It is also appropriate for non Parties to be charged on an equivalent basis to BSC Parties for the service.</p>
2.	Do you believe that P052 better facilitates the Applicable BSC Objectives, as defined in the Transmission Licence Condition 7A paragraph (3)? If so, which BSC Objective(s) and how?	<p>Yes</p> <p>Comments: This modification will allow greater data access and transparency in the trading arrangements which will help to promote effective competition in the generation and supply of electricity (Condition 7A (3) ©).</p>
3.	Do you believe that the same level of service should be given to non Parties as is given to Parties? If so, why?	<p>Yes</p> <p>Comments: It would be discriminatory if the same level of payment for a service should carry with it a lower level of service. As we agree that non Parties should be charged on the same basis as Parties under Section D of the BSC (see below), we would agree to them being entitled to a similar level of service.</p>
4.	Do you agree that non Parties should be charged in accordance with section D (BSC Cost Recovery and Participation Charges) as Parties currently are?	<p>Yes</p> <p>Comments:</p>
5.	Do you think that non Parties should be required to participate in Qualification tests?	<p>Yes</p> <p>Comments: the High Grade Link system is critical to the NETA activities of BSC parties. Therefore, we do not want problems in the non-BSC parties' systems to jeopardise the robustness of this system simply because their systems have not been tested properly. Qualification tests give a degree of assurance that the robustness of the High Grade Link is not compromised.</p>

No.	Question	Response
6.	What are the potential material benefits of implementing P052: <ul style="list-style-type: none"> ▪ to your organisation? ▪ to the industry? 	Comments: There may be some benefits to ourselves and the industry if a non Party were in a position to use the BM data to provide value added services.
7.	Does the Modification Proposal raise any other issues that should be considered as part of the Assessment Procedure?	Comments: No further comments.

P52_ASS_009 – British Energy

Name: Martin Mate

Organisation: British Energy

Response Provided on behalf of (BSC Parties):

British Energy Power & Energy Trading Ltd

British Energy Generation Ltd

Eggborough Power Ltd

Please note that YES, NO answers are requested for clarity, however, the reasoning behind these responses is also sought to enable a greater understanding of the issues and opinions.

No.	Question	Response
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No.	Question	Response
1.	Do you agree with the principles behind P052 i.e. Access to non Parties of BMRS Data via the High Grade Service?	<p>Yes, provided:</p> <p>(1) the non party contributes towards the costs of the service, in particular the full incremental cost of their connection,</p> <p>(2) non party usage should not be allowed to adversely affect the performance of the service for BSC Trading Parties ie. not a firm service - subject to suspension or termination in the event that the service to Trading Parties is adversely affected.</p>
2.	Do you believe that P052 better facilitates the Applicable BSC Objectives, as defined in the Transmission Licence Condition 7A paragraph (3)? If so, which BSC Objective(s) and how?	<p>Yes, provided additional costs are recovered from those requiring the service, and the efficiency of service for trading parties is not adversely affected. Increasing transparency could help promote competition and liquidity.</p>
3.	Do you believe that the same level of service should be given to non Parties as is given to Parties? If so, why?	<p>No</p> <p>Comments: Non parties should receive a less firm level of service - priority must be given to trading parties in the event that volume related problems are encountered.</p>
4.	Do you agree that non Parties should be charged in accordance with section D (BSC Cost Recovery and Participation Charges) as Parties currently are?	<p>Yes / No ?</p> <p>Comments: We have not checked Section D in detail, but believe that currently some of the costs associated with the service (mainly original development costs) are shared among trading parties according to traded volume based sharing factors, while some are easily discreetly identified and charged. We suspect that new clauses in Section D may be required to explicitly cover charging to non parties, such that parties can be assured that non parties contribute to all the costs associated with the service. Perverse incentives could be created if the cost is less than for a BSC Party.</p>

No.	Question	Response
5.	Do you think that non Parties should be required to participate in Qualification tests?	Yes Comments: Non parties should not be allowed to compromise the service by having inadequate systems and controls.
6.	What are the potential material benefits of implementing P052: <ul style="list-style-type: none"> ▪ to your organisation? ▪ to the industry? 	Comments: No specific benefit to BE, but increased transparency should promote general competition and liquidity. In particular, allowing independent access by non parties to price information should assist in promoting financial hedging instruments, and may allow non parties to advise prospective new entrants.
7.	Does the Modification Proposal raise any other issues that should be considered as part of the Assessment Procedure?	No Comments: No further comments at this time.