

## Responses from P50 (Alternative) Assessment Consultation

Consultation issued 19 February 2002

Representations were received from the following parties:

<b>No</b>	<b>Company</b>	<b>File Number</b>	<b>No. Parties Represented</b>
1.	TXU Europe	P50_ASS2_001	14
2.	LE Group	P50_ASS2_002	4
3.	SEEBOARD	P50_ASS2_003	2
4.	Alcan Smelting and Power UK	P50_ASS2_004	N/a
5.	Powergen UK plc	P50_ASS2_005	4
6.	Scottish & Southern Energy plc	P50_ASS2_006	4
7.	British Energy	P50_ASS2_007	3
8.	GPU Power UK	P50_ASS2_008	1
9.	ScottishPower UK plc	P50_ASS2_009	5
10.	Innogy Group	P50_ASS2_010	9

## **P50\_ASS2\_001 – TXU Europe**

Response to P50 Consultation for TXU Europe (14 Parties)

### **Section A: Alternative Modification – ‘Reporting Option 1’**

#### **1. Would this report be of interest to you? If so, why?**

No – because as a BSC Party it would not provide us with anything we are not currently entitled to receive. Neither would it allow us to process a reduced quantity of information as this variant of the data would not facilitate the production of (full) Generation and/or Supply market share data.

#### **2. How much would you be prepared to pay to receive this report on a weekly basis?**

As a BSC Party we would not take this report.

### **Section B: Alternative Modification – ‘Reporting Option 2’**

#### **1. Would this report be of interest to you? If so, why?**

If we were starting from here and the report contained the LEG data we would have said “yes” however all the data is already available and hence it is unlikely that we would take a new report containing a sub-set of data we already have.

#### **2. How much would you be prepared to pay to receive this report on a weekly basis?**

Not applicable.

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## **P50\_ASS2\_002 – LE Group**

Response from London Electricity Group

### **Section A: Alternative Modification – ‘Reporting Option 1’**

#### **1. Question: Would this report be of interest to you?**

Answer: No. As a BSC Party, we already have the demand data that we want available to us.

#### **2. Question: How much would you be prepared to pay to receive this report on a weekly basis?**

Answer: It follows that we would not be prepared to pay for this report.

## **Section B: Alternative Modification – 'Reporting Option 2'**

The same questions and answers apply

### **Other Comments:**

1. We would question if there is some ambiguity in the descriptions of both Option 1 and Option 2 in the interpretation of "weekly in arrears": - demand data isn't available until around WD+18, this mod mentions making data available "weekly in arrears". It's not really clear that they will need to make the data available "weekly, the contents (approx.) one month in arrears".
2. Because this proposal is not justified by any relationship with the Applicable Objectives, we would wish to see that the service takers should pay for both development and operational costs.

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  
25 February 2002

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### **P50\_ASS2\_003 – SEEBOARD**

Details of our responses to the above mentioned consultation are shown below:

A1 - This report contains information on Generator output that was available but is no longer. For this reason we would be interested in this report.

A2 - At this time we do not feel able to place a figure on the amount we would be willing to pay. The major reason being that summarised information of interest was previously available without charge.

B1 - Our response is as in A1.

B2 - Our response is as in B1.

C - BSC Parties are likely to be interested in some parts of these reporting options. We would like an option to be able to obtain those parts of the reports from a third party rather than taking everything. A number of non-parties might be willing to provide such a service by collecting and summarising this data into a form requested by a Party.

Dave Morton  
SEEBOARD Energy Limited  
SEEBOARD Power Networks plc

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## **P50\_ASS2\_004 – Alcan Smelting and Power UK**

Please find attached the response to Modification Consultation P50, on behalf of Alcan Smelting and Power UK ( which is not a BSC Party).

Bob Nicholson  
Power Commercial Manager

### **Section A: Alternative Modification – ‘Reporting Option 1’**

**1. Would this report be of interest to you? If so, why?**

No – it does not contain enough information for our needs.

**2. How much would you be prepared to pay to receive this report on a weekly basis?**

Nothing

### **Section B: Alternative Modification – ‘Reporting Option 2’**

**1. Would this report be of interest to you? If so, why?**

No – it does not contain enough information.

**2. How much would you be prepared to pay to receive this report on a weekly basis?**

Nothing

### **Section C: Further Comments**

Please indicate any other issues you would like to bring to the attention of the Modification Group regarding the alternative proposal.

We propose instead that the existing SO142 report be made publicly available by email to any requesting person. Since there is already an email distribution of this report to requesting BSC Parties, this could be done at zero cost, immediately, would provide more information to non-BSC Parties than the proposed modification and would not require new charging and credit mechanisms for non-BSC Parties to be devised.

The reality is that under NETA, data transparency has been severely damaged. It is essential to redress this as soon as possible, without resorting to lengthy and costly solutions.

The confidentiality issue could be used as a smokescreen to prevent release of data. All BSC Parties already have access to all data on their own competitors and those sites that have dedicated BM Units.

There are many non-BSC parties with a legitimate interest in obtaining such data, including small generators and suppliers, trade journals and reporting agencies and consultants who are currently being denied access to market data.

**Detail:****Insufficient information**

The summary reports as proposed would not make enough information publicly available. Under typical commercial arrangements, an embedded generator would need access to the following data items, half-hourly – none of these are available under the proposed modification:

- Residual Cashflow Reallocation ('beer fund'), expressed in £/MWh (so the underlying data items to calculate this figure are Total Residual Cashflow (TRC) and the total of Credited Energy Volumes by BSC Party/account);
- Transmission loss multipliers (TLM); and
- Imbalance volume for the BSC Party with whom we trade.

Alcan provides balancing services and we continually seek new opportunities in this area. To ensure that we can compete for these services, we would also wish to have access to Balancing Services Adjustment Data (currently on NGC's website but shortly to be withdrawn).

These items of data are all available on the SO142 NGC settlement report. We suggest that the entire report (rather than an extract) should be in the public domain.

**Excessive cost and consequent complexity**

We are concerned at the cost that would be incurred by the P50 alternative modification – presumably the costs would be levied on those (mainly small generators and suppliers) who wish to receive the data. This has already caused this modification to be rejected once (as part of modification P30), and is the cause of much of the complexity associated with the current modification (e.g. credit cover and charging mechanisms for non-BSC Parties).

**Our proposed alternative solution**

We believe that a better outcome could be achieved at lower cost than the proposed P50 alternative. BSC Parties currently receive the SO142 report by e-mail, and to add non-BSC Parties to the circulation list would presumably cost very little.

We understand that the email circulation of SO142 is an interim solution, and the longer-term solution is to use a download facility on a website. Again, it would appear to be a zero-cost solution to allow wider access to the SO142 report.

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**P50\_ASS2\_005 – Powergen UK plc****Respondent:****Representing (please list all parties):****Paul Jones****Powergen UK plc, Powergen Retail Limited, Diamond Power Generation Limited and Cottam Development Centre Limited**

**Section A: Alternative Modification – ‘Reporting Option 1’**

**1. Would this report be of interest to you? If so, why?**

No.

**2. How much would you be prepared to pay to receive this report on a weekly basis?**

If the report is created, we would not be keen to pay a specific charge to receive it.

**Section B: Alternative Modification – ‘Reporting Option 2’**

**1. Would this report be of interest to you? If so, why?**

No.

**2. How much would you be prepared to pay to receive this report on a weekly basis?**

If the report is created, we would not be keen to pay a specific charge to receive it.

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**P50\_ASS2\_006 – 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.

In relation to the Consultation on the Alternative Modification for Modification Proposal P50 contained in your note of 19th February 2002; whilst we continue to have concerns that non BSC parties are able to 'cherry pick' the services they receive, we welcome this Alternative Modification to P50 as it ensures the anonymity of the individual directly connected demand sites and the licence exempt generators.

Regards  
Garth Graham  
Scottish & Southern Energy plc

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**P50\_ASS2\_007 – British Energy**

**Section A**

**1) Would this report be of interest to you? If so why?**

British Energy would not be interested in this report as it already receives this information in the existing Settlement report.

**2) How much would you be prepared to pay to receive this report on a weekly basis?**

British Energy do not believe that they should contribute to the cost of this report as they do not require the information it will provide. We believe that the costs of this report should be met by those requiring the service

**Section B**

**1) Would this report be of interest to you? If so why?**

British Energy would not be interested in this report as it already receives this information in the existing Settlement report.

**2) How much would you be prepared to pay to receive this report on a weekly basis?**

British Energy do not believe that they should contribute to the cost of this report as they do not require the information it will provide. We believe that the costs of this report should be met by those requiring the service

Regards

Rachel Ace

on behalf of

British Energy Generation

British Energy Power and Energy Trading

Eggborough Power Ltd

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**P50\_ASS2\_008 – GPU Power UK**

Please find that GPU Power UK response to P50 - Distribution of BM Aggregation Report Data to Non BSC Parties is 'No Comment'.

thanks

Rachael Gardener

Deregulation Control Group &

Disribution Support Office

GPU POWER.NETWORKS (UK) plc

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**P50\_ASS2\_009 – ScottishPower UK Plc**

With reference to the above, I would refer you to our previous comments on the proposal, when we did not support the original mod P50: Distribution of BM Aggregation Report Data to Non BSC Parties on the grounds of: -

- Not better BSC objective;
- Confidentiality and
- Cost of implementation.

In considering this consultation, we believe that while the confidentiality issue may have been address in this Alternative, we have not seen any evidence it would meet the applicable BSC objectives. Also, the cost of implementation remains questionable as we suspect it is unlikely that enough non-BSC Parties will come forward to help to pay for this, which mean the burden will come down to BSC parties.

Therefore, in view of the above comments, we do not support this Alternative Proposal.

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

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### **P50\_ASS2\_010 – Innogy Group**

Response on behalf of Innogy Group (Innogy plc, Innogy Cogen Limited, Innogy Cogen Trading Limited, Npower Limited, Npower Direct Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited and Npower Yorkshire Supply Limited)

#### **Section A: Alternative Modification – ‘Reporting Option 1’**

1. Would this report be of interest to you? If so, why?

No

2. How much would you be prepared to pay to receive this report on a weekly basis?

£0

#### **Section B: Alternative Modification – ‘Reporting Option 2’**

1. Would this report be of interest to you? If so, why?

No

2. How much would you be prepared to pay to receive this report on a weekly basis?

£0

#### **Section C: Further Comments**

Please indicate any other issues you would like to bring to the attention of

the Modification Group regarding the alternative proposal.

1) We would observe that the major effect on competition in Supply arises through the availability of such information to industry participants. We note that all the information in the proposed reports is already available (at an even more detailed level) to BSC Parties.

2) With regard to the claim that information at this level of detail would enable Licence Exempt Generators to better know which Suppliers they can contract their output to, to maximise embedded benefits etc, the problem is that Metered Volumes only tell you what past consumption has been and do not give any clear indication of future sales or energy purchasing requirements (since the Supplier may already be fully covered in advance from other sources to meet his business plans). The potential from sales from new generation sources (i.e. the uncontracted proportion of the market) increases further months/years ahead, but clearly historic demand data is increasingly less relevant at this distance. Publication of Suppliers' demand data at a detailed level therefore adds little if any benefit compared with the facilities provided by the forward contracts markets and power exchanges.

3) Innogy Group questions whether, given the known characteristics of the Profiling mechanism, problems with central systems etc, release outside the industry of this aggregated information at the half hourly level is not going to expose the industry to the risk of having to respond to an increasing volume questions arising from analysis based on a partial understanding of complex processes and possibly mistaken conclusions, diverting effort from the main objective of improving service to customers.