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MODIFICATION REPORT
MODIFICATION PROPOSAL P46 -
BSC 'HOUSEKEEPING'
MODIFICATION

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

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I DOCUMENT CONTROL

a Authorities

Version	Date	Author	Signature	Change Reference
1.0	18/12/01	ELEXON		Final version for Authority determination
2.0	04/03/02	ELEXON		Revised version with one change removed.

Version	Date	Reviewer	Signature	Responsibility
2.0	04/03/02	ELEXON Mods		

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

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1 SUMMARY AND RECOMMENDATIONS

1.1 Summary

A number of minor inefficiencies, inconsistencies and typographical errors have been identified within the BSC. This Proposed Modification represents a consolidation of the various 'housekeeping' changes required to rectify these defects. The specific changes are detailed in Section 5 of this report.

This proposal was raised on 18 October 2001 by the BSC Panel on the recommendation of ELEXON. It was submitted to the BSC Panel on 15 November 2001 and proceeded directly to the Report Phase as the changes are of a minor and inconsequential nature. After consultation with interested parties, the Panel considered this Modification Report at its meeting on 13 December 2001 and determined to make the recommendations set out below.

1.2 Recommendations

On the basis of the analysis, consultation and assessment undertaken in respect of this Modification Proposal, the BSC Panel recommends that:

- 1. The Authority should approve this Proposed Modification; and**
- 2. If approved, the Proposed Modification should be implemented 5 working days after the date of the Authority's determination.**

1.3 Rationale for Recommendations

This modification seeks to address a number of minor inefficiencies in the implementation and administration of the balancing and settlement arrangements, together with some internal errors and inconsistencies within the BSC. If unremedied, these errors and inconsistencies can potentially lead to Trading Disputes or even cause settlement errors. Addressing these defects periodically, via a consolidated housekeeping modification, is a more robust and efficient way of administering arrangements than awaiting individual disputes and issues to arise. Clearly it is also in all parties' general interests that the BSC is as accurate and internally consistent as possible.

The Panel therefore believes that this modification would better facilitate the achievement of the Applicable BSC Objectives contained in Condition C3 of the Transmission Licence. In particular, the modification is justified with reference to the objective in Condition C3(3)(d) (*'promoting efficiency in the implementation and administration of the balancing and settlement arrangements'*). The proposal has no impact on any of the other objectives, as set out in Condition C3(3)(a) to (c).

Four of these changes have a minor impact on the information or data provided to BSC Agents. The suggested changes have no systems impact. The effect of the changes is to increase efficiency in the administration of BSC processes and, accordingly, they have been raised under BSC C3.8.8 with a view to increasing efficiency and, again, better achieving the objective in Condition C3(3)(d).

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

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.

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).

A Modification Report must be prepared and submitted to the Authority in respect of each proposed modification and must contain:

- (a) The recommendation of the Panel as to whether or not the Proposed Modification or any Alternative Modification should be made;
- (b) The proposed Implementation Date for implementation of the Proposed Modification or any Alternative Modification;
- (c) The matters set out in Annex F-1 of the BSC. This will usually be in the form of the relevant Assessment Report where the Proposal has been submitted to a Modification Group prior to the Report Phase;
- (d) An explanation of the Panel's rationale should the Panel form a different view of any matters contained in the Modification Group Report; and
- (e) A summary of the representations made by Parties and interested third parties during the consultation undertaken in respect of the Proposed Modification and any Alternative Modification.

4 HISTORY OF PROPOSED MODIFICATION

This proposal was raised on 18 October 2001 by the BSC Panel on the recommendation of ELEXON under the provisions set out in section F2.1.1(d)(i) and (iv) of the BSC. These provisions give the Panel the power to raise Modification Proposals where to do so would better facilitate achievement of the objective of 'efficiency in the implementation and administration of the balancing and settlement arrangements' or would have the purpose 'to rectify manifest errors in the BSC, or to correct minor inconsistencies or to make other minor consequential changes to the BSC.'

At its meeting on 15 November 2001 the BSC Panel directed that this proposal should proceed directly to the Report Phase pursuant to BSC F2.7. This decision was made in view of the guidance provided in BSC F2.2.4, which states:

'For the avoidance of doubt, it is expected that the Panel would usually proceed directly to the Report Phase pursuant to paragraph 2.2.3(b)(iii) where the Modification Proposal is of a minor or inconsequential nature and/or where the recommendation which the Panel should make to the Authority in relation to such Modification Proposal would generally be considered to be self-evident.'

Accordingly, a draft Modification Report was prepared and issued for consultation on 21 November 2001. A summary of the responses received can be found in section 7 and copies of all responses found in Annex 1 of this report.

The Panel considered the draft Modification Report and consultation responses at its meeting on 13 December 2001 and confirmed its recommendation to the Authority that the Proposed Modification should be approved.

5 DESCRIPTION OF PROPOSED MODIFICATION

The following table below describes the various housekeeping changes that have been consolidated to form this Proposed Modification.

LOG OF BSC 'HOUSEKEEPING' MODIFICATIONS

Ref.	Section Impacted	Version	Requirement	Explanation
1.	D 4.3.8	1.1	Change: '...BSC Costs are or are or likely to be...' to: '...BSC Costs are or are likely to be...'	Manifest Error: Typo.
2.	Annex D-5, 1.2.1 and 2.2.1	1.1	Change the 'x' in the formulae for the calculation of the 'Quarterly 1998 Programme Amount' and the 'Quarterly Pool NETA Amount' to '*'.	The 'x' referred to is intended to be a multiplication sign. However, throughout the BSC, the multiplication sign used is '*'.
3.	E2.8	1.1	Delete Paragraph E2.8	This paragraph covers the 'Suspension Period' and has been made redundant on the implementation of changes to the ECVA system
4.	F 1.6.3	1.1	Delete Paragraph F1.6.3 (and renumber Paragraphs F1.6.4 to F1.6.6 as a consequence)	This paragraph states that the Panel should endeavour to establish joint working arrangements by no later than the Go-live Date. As the Go-live date is now past, this is no longer relevant. The obligation to put these working arrangements in place is contained in F1.6.1 and will be unaffected by this change.
5.	F 2.11.1	1.1	Change the cross-reference to '2.6.6(d)' to '2.6.6(e)'.	Erroneous cross-reference.

Ref.	Section Impacted	Version	Requirement	Explanation
6.	K 4.3.1	1.1	Change: '...notify the Trading Unit Applicants and the CRA...' to: '...notify the Trading Unit Applicants and, where the Trading Unit Application is approved, the CRA...'	Section K 4.3.1 states that the Panel shall, once a determination has been made on a Trading Unit Application, notify the Trading Unit Applicant and CRA. The CRA only needs to be notified when the Panel has approved a Trading Unit Application. It would cause an unnecessary cost in implementation to inform CRA of the non-approved TU applications. The CRA have confirmed that they only want the information on Application approval.
7.	K4.4.1(b)	1.1	Change: 'there is a Exempt Export BM Unit in the same GSP Group as the TU BM Units, to: 'there is an Exempt Export BM Unit in the same GSP Group as the TU BM Unit(s),	Section X2.1.1 states that addition of (s) means words in the singular may also be interpreted as including the plural and vice versa. The use of (s) is already defined in 4.4.1(a), so for the sake of consistency all subsequent definitions where this applies should be changed. 'a' to 'an' is a typo.
8.	K4.4.3	1.1	Change: '(a) the identity of the Lead Party for the Exempt Export BM Unit and for each of the TM BM Units; (b) the Exempt Export BM Unit and the TU BM Units; to: '(a) the identity of the Lead Party for the Exempt Export BM Unit and for each of the TM BM Unit(s); (b) the Exempt Export BM Unit and the TU BM Unit(s);	See explanation for K4.4.1(b)

Ref.	Section Impacted	Version	Requirement	Explanation
9.	M 2.3	1.1	Delete the following sections: M 2.3.5, 2.3.6, 2.3.7, 2.3.8, 2.3.9 and 2.3.10 This also requires the consequential deletion of the definition of 'Permitted Reduction Amount' in Annex X-1	These sections describe the Credit Cover Reduction procedure to be used during the Suspension Period, and so are now no longer required (See CP519)
10.	M 3.3.8	1.1	Delete section M 3.3.8	This section gives the definitions for Credit Default Refusal and Rejection Periods that are to be used during the Suspension Period. These definitions have been replaced by those given in M 3.3.5 and 3.3.6(b), so section M 3.3.8 should be removed (See CP540)
11.	N 3.1.1(a)	1.1	Change: '...in consultation with the SAA, the CDCA and the SVAA and subject to...' to: '...in consultation with the SAA and subject to...'	Section N 3.1.1(a) states that BSCCo, SAA, CDCA and SVAA will review the details of the Payment Calendar; FAA R034 and BSCP301 only require the SAA to be consulted prior to the Payment Calendar being approved by BSCCo. Not making this change would lead to unnecessary expense through involvement of other BSC Agents. The CDCA and SVAA have confirmed that they do not want this information
12.	N 3.3.2	1.1	Change: '...promptly to BSCCo, each BSC Agent and each Payment Party...' to: 'promptly to BSCCo, the SAA and each Payment Party...'	Code Section N 3.3.2 states that the FAA shall distribute the Payment Calendar to the BSCCo, each BSC Agent and each Payment Party. The FAA URS and BSCP301 say that the Calendar should be sent to BSCCo, each Payment Party and the SAA. Not making this change would lead to unnecessary expense through involvement of other BSC Agents. The other BSC Agents have confirmed that they do not want the information.

Ref.	Section Impacted	Version	Requirement	Explanation
13.	P2.2.5	1.1	Change: ‘the successor ECVNA Authorisation shall be considered to the same that under the first’ to: ‘the successor ECVNA Authorisation shall be considered to the same as that under the first’	Manifest Error: Word omitted.
14.	Q 7	2.0	Change all references in this section to ‘Bid/Offer Pairs’ to ‘Bid-Offer Pairs’	This change is required to ensure the consistent use of terms within the Code.
15.	R 5.7.1	1.1	Change: ‘(a) for each Volume Allocation Unit, BM Unit Metered Volumes...’ to: ‘(a) for each relevant BM Unit, Interconnector and GSP Group respectively, BM Unit Metered Volumes,’	Code Section R 5.7.1 states that the CDCA shall submit for each Volume Allocation Unit, BM Unit Metered Volume, Interconnector Metered Volume and GSP Group Takes for each Settlement Period to the SAA. The definition of a Volume Allocation Unit in R 1.1.1 also includes Grid Supply Points, however, this information is not passed to the SAA in R 4.7.1. To clarify the R 4.7.1 obligation the reference to Volume Allocation Unit should be removed
16.	Annex S2 5.1.16 (c) and (d)	1.1	For both (c) and (d) change: $AFYC_{HPR} = UAFYCA_{HPR}$ To: $AFYC_{HPR} = UAFYC_{HPR}$	The AFYC is calculated as an unadjusted value (UAFYC) plus an adjustment (AFYCA). UAFYCA is undefined in the Code and would represent an ‘unadjusted adjustment’.
17.	Annex S2 6.5.3(e)	1.1	Change: ‘RCQ3j*ThuT’ To ‘(RCQ3j*ThuT)’	Typo: There is a missing bracket at the beginning of the 4 term containing the product RCQ3j*ThuT

Ref.	Section Impacted	Version	Requirement	Explanation
18.	Annex S2 6.6.17(b)	1.1	Delete Paragraph 6.6.17(b) in Annex 2. Move 6.6.17(d) and renumber it (b)	Paragraphs 6.6.17(b) and 6.6.17(d) both define LOWF and it is a manifest error to have two different versions of the definition. 6.6.17(d) is obviously the correct definition because the logic of the profiling process requires that NF and LOWF sum to one, therefore the rules for calculating LOWF must be consistent with those for calculating NF in 6.6.17(c).
19.	Annex S2 6.6.17(c)	1.1	Change: (c) (determine the Low Fraction to: (c) determine the Low Fraction	Manifest Error: an additional obviously spurious open bracket should be removed
20.	Annex S2 6.6.17(d)	1.1	Insert new paragraph as 6.6.17(d) '(d) determine the Base Fraction (BF_{HPC}) and the Switched Fraction (SWF_{HPC}) as follows: $BF_{HPC} = (1 + H_{HPC}) * NF_{HPC}$; and $SWF_{HPC} = LOWF_{HPC} - (H_{HPC} * NF_{HPC})$; and'	Manifest Error: This paragraph was not transcribed from Section 55 of the Pool Rules into Section S with the result that a variable(H) is calculated and not used and two variables (BF and SWF) are used but not calculated.
21.	T1.7.1	3.0	Change: $DMAT_d$ To: $DMAT$	There is an inconsistent use of the subscript 'd' in the BSC. For example, $DMAT_d$ and CAP are both parameters like CADL that can be changed from time to time, but one has a subscript and one does not.
22.	Annex T1 1A.1(a)			
23.	Annex T1 1A1(b)			
24.	Annex X2 Table X-2			
25.	T3.4A.4(b)	3.0	Change: ' $BOUR_{ij}^n(t) = FPN_{ij}(t) + \sum^n qBO_{ij}^n(t)$ ' To ' $BOLR_{ij}^n(t) = FPN_{ij}(t) + \sum^n qBO_{ij}^n(t)$ '	It is clear from the context that BOLR rather than BOUR was intended. If strictly followed, the current equation would lead to the calculation of acceptance volumes that were clearly erroneous.

Ref.	Section Impacted	Version	Requirement	Explanation
26.	T3.5.1(a)	3.0	Change: 'BOUR ⁻¹ _{ij} (t)' To: 'BOUR ¹ _{ij} (t)'	Manifest Error: term BOUR in the equation should have a superscript of '1' and not '-1'.
27.	T.3.5.1(b)(i)	3.0	Change: ' Σ^{n+} ' τ ' Σ^{ns+} '	3.5.1(b)(i) has Σ^{ns+} in the equation, but Σ^{n+} in the explanatory text below it. Hence the reference to Σ^{n+} should be changed to be consistent with the equation.
28.	T Annex T-1 2.2	3.0	Change: 'If, for the highest priced accepted non-De Minimis Bid, QAB ^g _{ij} (if any) which is not an Arbitrage Accepted Bid, there exists any accepted non-De Minimis Offer' To: 'If, for the highest priced accepted Non-De Minimis Bid, QAB ^g _{ij} (if any) which is not an Arbitrage Accepted Bid, there exists any accepted Non-De Minimis Offer'	Inconsistency in capitalisation of Non-De Minimus, should be a defined term

Ref.	Section Impacted	Version	Requirement	Explanation
29.	U 2.4.2	1.1	<p>Change: ‘The SAA shall, following receipt from the FAA of the Payment Calendar under Section N3.3.2, prepare in accordance with BSCP 01 and deliver to BSCCo, each other Party, and each other BSC Agent, a Settlement Calendar showing, for the next following BSC Year:’</p> <p>To: ‘The SAA shall, following receipt from the FAA of the Payment Calendar under Section N3.3.2, prepare in accordance with BSCP 01 and deliver to BSCCo, each other Party, the CDCA, the SVAA and the ECVAA, a Settlement Calendar showing, for the next following BSC Year:’</p>	<p>BSC Section U2.4.2 instructs the SAA to distribute the Settlement Calendar to the BSCCo, each other Party and each other Agent; the SAA URS and BSCP301 say the only Agents to receive the Calendar are the CDCA and SVAA.</p> <p>The inclusion of other BSC Agents in the distribution of the Settlement Calendar would create superfluous work and incur unnecessary expense. The other BSC Agents have confirmed that they do not want the information (although it has been requested that ECVAA continue to receive it in case, for commercial reasons, at some future date the different functions are divided between different companies)</p>
30.	W3.4.3(b)	1.1	<p>Change: ‘(as referred to in paragraph 1.3.1(a) are appropriate’</p> <p>to: ‘(as referred to in paragraph 1.3.1(a)) are appropriate’</p>	The close parenthesis is missing.
31.	X1	2.0	<p>Change: “TU BM Units”: has the meaning given to that term in Section K4.4.1;</p> <p>to “TU BM Unit(s)”: has the meaning given to that term in Section K4.4.1;’</p>	Section K4.4.1 defines TU BM Unit(s)
32.	Annex X-1	2.0	<p>Change definition of “Implementation Date” from: ‘as such date may be extended pursuant to Section F2.12.8;’</p> <p>To: ‘as such date may be extended pursuant to Section F2.11.7’</p>	Incorrect cross-reference

Ref.	Section Impacted	Version	Requirement	Explanation
33.	Annex X-1	2.0	<p>The following definitions should be added:</p> <p>"De Minimis Accepted Bids" Has the meaning given to that term in Annex T-1 1A.1 (a).</p> <p>"De Minimis Accepted Offers" Has the meaning given to that term in Annex T-1 1A.1 (b).</p> <p>"Non-De Minimis Accepted Bids" Has the meaning given to that term in Annex T-1 1A.2.</p> <p>"Non-De Minimis Accepted Offers" Has the meaning given to that term in Annex T-1 1A.2.'</p>	<p>These additions are required in the General Glossary as they are capitalised in Annex T-1 but not defined in the Annex</p>
34.	Annex X-1	2.0	<p>Delete the following definition:</p> <p>"Permitted Reduction Amount": has the meaning given to that term in Section M2.3.8</p>	<p>See Ref 9 above.</p>

Ref.	Section Impacted	Version	Requirement	Explanation
35.	Annex X-2 Table X-3	3.0	Add: BPAj £/MWh Buy Price Price Adjustment CADki Minutes Continuous Acceptance Duration CADL Minutes Continuous Acceptance Duration Limit DMAT MWh De Minimis Acceptance Threshold QAPBknij MWh Period Priced Accepted Bid Volume QAPBnij MWh Period BM Unit Total Priced Accepted Bid Volume QAPOknij MWh Period Priced Accepted Offer Volume QAPONij MWh Period BM Unit Total Priced Accepted Offer Volume SPAj £/MWh Sell Price Price Adjustment TQUABj MWh System Total Un-Priced Accepted Bid Volume TQUAOj MWh System Total Un-Priced Accepted Offer Volume	These acronyms were introduced in to the BSC by Modification Proposals P8, P10 and P18a, but were not included in Table X-3 of Annex X2 (although they were included in Table X-2). They should be added to Table X-3 for consistency.
36.	Annex X-2 Table X-3	3.0	Change: QAB ⁿ _{ij}) To: QAB ⁿ _{ij}	Manifest Error: Removal of obviously spurious close bracket.

6 ASSESSMENT

As the various changes described in this report are contained to BSC drafting revisions and are of a relatively minor or inconsequential nature, it has not been necessary to undertake a detailed assessment of the impact of making the changes on central and parties' systems and processes.

- The majority of changes are to correct minor errors or inconsistencies in the BSC. These changes have no impact on the systems or processes of ELEXON, BSC Agents, Parties or Party Agents.
- A small number of the changes have a minor impact on information or data provided to BSC Agents. The suggested changes have no systems impact. The effect of these changes is to increase efficiency in the administration of the BSC. The impacted parties have been consulted in respect of these changes and are content with the proposals presented.

The four changes described above are:

7. K4.3.1: The proposed change will ensure that the CRA will only receive notification of a Trading Unit Application when that Application is approved. The CRA have confirmed that this is the only point at which they require to be informed;

14. N3.1.1(a): The proposed change will remove the CDCA and SVAA from reviewing the Payment Calendar. They have confirmed that they are only interested in information relating to the SAA Settlement Calendar;

15. N3.3.2: The proposed change will remove the CDCA and SVAA from receiving the Payment Calendar. They have confirmed that they are only interested in receiving the Settlement Calendar;

27. U2.4.2: The proposed change limits the receipt of the Settlement Calendar to the CDCA, SVAA and ECVAA. Although the Code states that all BSC Agents shall receive it, in practice only the CDCA and SVAA currently want to, or do receive it. It was requested that ECVAA be added to the circulation list in Section U in case at some point in future, for commercial reasons, this function is separated into a different company.

7 SUMMARY OF REPRESENTATIONS

5 submissions (representing the views of 28 BSC Parties) were received in response to the consultation on the Draft Modification Report. All of the respondents were supportive of the Proposed Modification. 2 of the respondents identified a number of minor amendments to the proposed changes, which have been incorporated in this Final Version of the Modification Report.

ANNEX 1 – REPRESENTATIONS

Responses from P46 Draft Modification Report Consultation

Consultation issued 21 November 2001

Representations were received from the following parties:

No	Company	File Number	No. Parties Represented
1.	TXU	P46_MR_001	14
2.	Powergen UK plc	P46_MR_002	4
3.	SEEBOARD	P46_MR_003	1
4.	British Gas Trading	P46_MR_004	4
5.	ScottishPower UK Plc	P46_MR_005	5

P46_MR_001 – TXU

TXU Europe Energy Trading (on behalf of 14 TXU Europe companies) would like to express support for the implementation of this proposal.

Regards
Nicola Lea
Market Development Analyst

P46_MR_002 – Powergen UK plc

MODIFICATION PROPOSAL P46 – BSC 'HOUSEKEEPING' MODIFICATION.

Powergen UK plc welcomes the opportunity to make comments on the draft Modification Report detailed above, and provides this response on behalf of itself and the following BSC Parties: Powergen Retail Limited, Diamond Power Generation Limited, and Cottam Development Centre Limited.

Powergen UK plc supports the adoption and implementation of the 36 changes proposed within the above Modification Proposal.

Should you want any further information, or wish to discuss any of the issues raised further, please do not hesitate to contact me.

Yours sincerely,
Geoff Allen
Head of Balancing Mechanism Settlement
Powergen UK plc.

Tel: 024 7642 4708
Fax: 024 7642 4311
E:mail: geoff.allen@pgen.com

P46_MR_003 – SEEBOARD

We have a number of comments regarding issues in section 5 of the draft modification report. Using reference numbers within that section these are detailed below:

Ref. 2 - a similar error is also in Annex D-5 1.2.1 and should be included in this modification.

Ref. 4 - will sections F1.6.4 to 1.6.6 be renumbered? If so have all references, if any exist, to these paragraphs within BSC been located and marked for amendments.

Ref. 6 - With respect to the expressions an additional summation has been added to the denominator in the changed version. This needs to be clarified as further issues might be raised against this change.

Ref. 10 - it is assumed that no other areas of BSC refer to these 6 paragraphs, has this been considered.

Ref. 11 - agreed provided no other sections refer to M3.3.8.

Ref. 15 - change should be made against version 2.0 of this BSC section.

Ref. 19 - provided there are no references to current 6.6.17(b) and any to 6.6.17(d) will be amended then this change is agreed.

Ref. 26-9 - changes should be made against version 3.0 of this BSC section.

With these addressed we would have no issues with this modification being implemented. An implementation date 5 days after the Authority's determination would be acceptable. Future such modifications are also seen as an appropriate mechanism for correcting any other minor internal errors or inconsistencies. It is felt that these could be raised on an ad-hoc basis when appropriate.

Dave Morton
SEEBOARD
0190 328 3465

P46_MR_004 - British Gas Trading

Modification Proposal 46: BSC 'Housekeeping Modification'

Thank you for the opportunity of responding to this modification. This response is on behalf of British Gas Trading, Accord, Centrica King's Lynn and Centrica Peterborough.

We support the implementation of this modification proposal as better facilitating Applicable BSC Objective d): Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.

Yours faithfully,
Danielle Lane
Transportation Analyst

P46_MR_005 – ScottishPower UK Plc

I would like to thank you for this opportunity to comment on the Modification Report for P46 and can confirm that we fully support the recommendations of the Modification Group in this matter. We further agree that implementation should be scheduled in accordance with the timescales proposed.

However, for the sake of completeness, we have identified the following minor points, which we believe may require some attention:

Ref. 13: Sec. N3.3.2 - insert "the" before "SAA";

Ref. 16: Sec. R5.7.1 - insert "the" between "respectively" and "BM" and the last word should be "Volumes";

Ref. 30: Sec. U2.4.2 - insert "the" before "CDCA", "SVAA" and "ECVAA" respectively;

Ref. 34: Annex X-1 - the definition of "Non-De Minimis Accepted Bids" and "Non-De Minimis Accepted Offers" should be cross-referenced to Annex T-1 1A.2 and not 2.2 where the calculation of these terms is outlined.

I trust that you will find these comments helpful.

Yours Sincerely,

James Nixon

Calanais Ltd.

For and on behalf of: -

ScottishPower UK Plc.

SP Energy Trading Ltd.

SP Generation Ltd.

Scottish Power Energy Retail Ltd.

Emerald Power Generation Ltd.
