

12 REPRESENTATIONS RECEIVED

12.1 Responses to Consultation and Impact Assessment

Below are the detailed responses which have been received. NGC's detailed response is contained in Annex 5:

From: Murray, Andrew[SMTP:andrew.murray@entergy.co.uk]
Sent: 29 August 2001 09:45
To: 'ccc@elexon.co.uk'
Subject: P33 Consultation and Impact Assessment

Entergy and Axia Energy would prefer Option A – both surplus and demand margin. We would then have implied figures for operating reserve requirements. There would be no lead time required to change our systems. I attach the complete questionnaire.

<<CPC040.doc>>

Trust this is sufficient.

Regards, Andrew Murray, Senior Commercial Manager, amurr90@entergy.com, +44 (0) 20 7337 8328, +44 (0) 7788 753806

No	Question	Party / Party Agent Response
1.	Do you support the implementation of the status quo (solution C)?	No
2.	Will there be an impact on your organisation of implementing the status quo (solution C)?	No
3.	What lead-time would be required by your organisation if the status quo (solution C) were to be implemented?	None
4.	If a 'No' response was provided for question 1, do you prefer the implementation of solution A (NGC to provide both the 'surplus' and the Generating Plant Demand Margin to the BMRS)?	Yes
5.	If you prefer solution A, provide a rationale for this decision.	We would then have implied figures for operating reserve requirements
6.	Will there be an impact on your organisation of implementing solution A.	No
7.	What lead-time would be required by your organisation if solution A were to be implemented?	None
8.	If a 'No' response was provided for question 1, do you prefer the implementation of solution B (NGC to provide only the Generating Plant Demand Margin to the BMRS)?	No
9.	If you prefer solution B, provide a rationale for this decision.	
10.	Will there be an impact on your organisation of implementing solution B?	No
11.	What lead-time would be required by your organisation if solution B were to be implemented?	

From: Harris Tony[SMTP:Tony_Harris@lpnet.co.uk]
Sent: 29 August 2001 09:09
To: 'ccc@elexon.co.uk'
Subject: RE: CPC040 – HLIA

This is a response on behalf of MPAS – London – Distribution Business. We would wish to declare no interest / no impact on MPAS or Distribution Business.

Tony Harris, Change Control Co-ordinator, Tel: 020-7725 3002

From: Harvey, Corrina[SMTP:Corrina.Harvey@invensys.com]
Sent: 31 August 2001 11:32
To: 'ccc@elexon.co.uk'
Subject: P33 Consultation and Impact Assessment

Response as requested:

<<CPC0401.doc>>

No	Question	Party / Party Agent Response
1.	Do you support the implementation of the status quo (solution C)?	
2.	Will there be an impact on your organisation of implementing the status quo (solution C)?	No
3.	What lead-time would be required by your organisation if the status quo (solution C) were to be implemented?	
4.	If a 'No' response was provided for question 1, do you prefer the implementation of solution A (NGC to provide both the 'surplus' and the Generating Plant Demand Margin to the BMRS)?	
5.	If you prefer solution A, provide a rationale for this decision.	
6.	Will there be an impact on your organisation of implementing solution A.	No
7.	What lead-time would be required by your organisation if solution A were to be implemented?	
8.	If a 'No' response was provided for question 1, do you prefer the implementation of solution B (NGC to provide only the Generating Plant Demand Margin to the BMRS)?	
9.	If you prefer solution B, provide a rationale for this decision.	
10.	Will there be an impact on your organisation of implementing solution B?	No
11.	What lead-time would be required by your organisation if solution B were to be implemented?	

From: lina.shah@siemens.co.uk[SMTP:lina.shah@siemens.co.uk]
Sent: 03 September 2001 08:36
To: ccc@elexon.co.uk
Subject: P33 Consultation and Impact Assessment

Response:
(See attached file: CPC040.doc)

Regards, Lina

No	Question	Party / Party Agent Response
1.	Do you support the implementation of the status quo (solution C)?	Not relevant
2.	Will there be an impact on your organisation of implementing the status quo (solution C)?	No
3.	What lead-time would be required by your organisation if the status quo (solution C) were to be implemented?	Not relevant

No	Question	Party / Party Agent Response
4.	If a 'No' response was provided for question 1, do you prefer the implementation of solution A (NGC to provide both the 'surplus' and the Generating Plant Demand Margin to the BMRS)?	Not relevant
5.	If you prefer solution A, provide a rationale for this decision.	Not relevant
6.	Will there be an impact on your organisation of implementing solution A.	No
7.	What lead-time would be required by your organisation if solution A were to be implemented?	Not relevant
8.	If a 'No' response was provided for question 1, do you prefer the implementation of solution B (NGC to provide only the Generating Plant Demand Margin to the BMRS)?	<i>Not relevant</i>
9.	If you prefer solution B, provide a rationale for this decision.	Not relevant
10.	Will there be an impact on your organisation of implementing solution B?	No
11.	What lead-time would be required by your organisation if solution B were to be implemented?	Not relevant

From: Gardener, Rachael[SMTP:rachael.gardener@gpupower.co.uk]
Sent: 03 September 2001 12:54
To: 'Joanne Culpeck'
Subject: GPU POWER UK response to CPC040 – HLIA

Hello,

Please find that GPU POWER UK response to CPC 040 is 'No Comment'.

Regards, Rachael Gardener, Deregulation Control Group & Distribution Support Office, GPU POWER.CO.UK, * 08457 353637 Ext: 09 – 3802, Fax: 01384 405177, Email: rachael.gardener@gpupower.co.uk & dgc@gpupower.co.uk

First of two responses received from TXU Europe:

From: nikki.lea@txu-europe.com[SMTP:nikki.lea@txu-europe.com]
Sent: 03 September 2001 12:41
To: modifications@elexon.co.uk
Cc: ccc@elexon.co.uk
Subject: P33 Consultation and Impact Assessment

Please find attached TXU's response to the above.

(See attached file: P33_030901.doc)

<u>Response</u>	<u>Party / Party Agent</u>
1. Do you support the implementation of the status quo (solution C)?	No
2. Will there be an impact on your organisation of implementing the status quo (solution C)?	Not relevant
3. What lead-time would be required by your organisation if the status quo (solution C) were to be implemented?	Not relevant

2. If a 'No' response was provided for question 1, do you prefer the implementation of solution A (NGC to provide both the 'surplus' and the Generating Plant Demand Margin to the BMRS)? **No**
5. If you prefer solution A, provide a rationale for this decision. **Not relevant**
6. Will there be an impact on your organisation of implementing solution A. **Not relevant**
3. What lead-time would be required by your organisation if solution A were to be implemented? **Not relevant**
4. If a 'No' response was provided for question 1, do you prefer the implementation of solution B (NGC to provide only the Generating Plant Demand Margin to the BMRS)? **Yes**
5. If you prefer solution B, provide a rationale for this decision. **This is the supply/dem and margin which is what matters to traders – this is why the BSC was written as it is. Changing it to something that NGC happen to already have is not an acceptable alternative.**
10. Will there be an impact on your organisation of implementing solution B? **No**
12. What lead-time would be required by your organisation if solution B were to be implemented? **None**

Second of two responses received from TXU Europe:

From: edward.coleman@txu-europe.com[SMTP:edward.coleman@txu-europe.com]
Sent: 05 September 2001 12:08
To: ccc@elexon.co.uk
Subject: CPC0040

(See attached file: CPC040r.doc)

Sorry for the slight delay on this document.

Edward

No	Question	Party / Party Agent Response
1.	Do you support the implementation of the status quo (solution C)?	No
2.	Will there be an impact on your organisation of implementing the status quo (solution C)?	Yes
3.	What lead-time would be required by your organisation if the status quo (solution C) were to be implemented?	C20 man days
4.	If a 'No' response was provided for question 1, do you prefer the implementation of solution A (NGC to provide both the 'surplus' and the Generating Plant Demand Margin to the BMRS)?	N/A
5.	If you prefer solution A, provide a rationale for this decision.	
6.	Will there be an impact on your organisation of implementing solution A.	
7.	What lead-time would be required by your organisation if solution A were to be implemented?	
8.	If a 'No' response was provided for question 1, do you prefer the implementation of solution B (NGC to provide only the Generating Plant Demand Margin to the BMRS)?	Yes
9.	If you prefer solution B, provide a rationale for this decision.	NGC should be providing what is detailed in the BSC
10.	Will there be an impact on your organisation of implementing solution B?	No
11.	What lead-time would be required by your organisation if solution B were to be implemented?	

From: Peter O'Grady [SMTP:peterogrady@corby-power-station.com]
Sent: 03 September 2001 15:40
To: 'joanne.culpeck@elexon.co.uk'
Cc: John Dolan
Subject: CPC040 – HLIA

Joanne

At present we do not use this information as a part of business at CPL. As such we have no specific comments on the proposals which do not appear to have any overall impact to the business at this time.

Regards, Peter O'Grady, Production Manager

From: Rekha Patel [SMTP:rekha.patel@dynegy.co.uk]
Sent: 04 September 2001 13:18
To: modifications@elexon.co.uk
Subject: 'P33 consultation and impact assessment'

Attached is Dynegy's response concerning modification proposal P33.

Any question please get in contact on 020 8334 7267.

Rekha Patel

Party / Party Agent Response

1. Do you support the implementation of the

status quo (solution C)?	No
2. Will there be an impact on your organisation of implementing the status quo (solution C)?	
3. What lead-time would be required by your organisation if the status quo (solution C) were to be implemented?	
4. If a 'No' response was provided for question 1, do you prefer the implementation of solution A (NGC to provide both the 'surplus' and the Generating Plant Demand Margin to the BMRS)?	Yes
5. If you prefer solution A, provide a rationale be for this decision.	Dynegy believe transparency will
	Improved through providing
	both
	"Generating Plant Demand Margin" and "Surplus" data. There is a lack of clarity concerning the data flows that are presently being distributed.
6. Will there be an impact on your organisation of implementing solution A.	No
7. What lead-time would be required by your organisation if solution A were to be implemented?	Zero
8. If a 'No' response was provided for question 1, do you prefer the implementation of solution B (NGC to provide only the Generating Plant Demand Margin to the BMRS)?	No
9. If you prefer solution B, provide a rationale for this decision.	
10. Will there be an impact on your organisation of implementing solution B?	No
11. What lead-time would be required by your organisation if solution B were to be implemented?	Zero

From: Chris.Price@pgen.com[SMTP:Chris.Price@pgen.com]
Sent: 04 September 2001 09:04
To: modifications@elexon.co.uk
Subject: P33 Consultation and Impact Assessment

Sorry for the layout but I couldn't copy and paste the pdf file. Please find powergen's response below

Regards, chris price

	<u>Party / Party Agent Response</u>
1. Do you support the implementation of the status quo (solution C)?	No
2. Will there be an impact on your organisation of implementing the status quo (solution C)?	YES
3. What lead-time would be required by your organisation if the status Notice quo (solution C) were to be implemented?	3 Months
4. If a 'No' response was provided for question 1, do you prefer the implementation of solution A (NGC to provide both the 'surplus' and the Generating Plant Demand Margin to the BMRS)?	Yes
5. If you prefer solution A, provide a rationale for this decision.	Powergen supports the implementation of Option A for the same reasons that NGC has outlined in the Modification Proposal. In essence, P33 will remove the current inconsistencies and improve clarity.
6. Will there be an impact on your organisation of implementing solution A.	Yes
7. What lead-time would be required by your organisation if solution A were to Notice be implemented?	3 Months
8. If a 'No' response was provided for question 1, do you prefer the implementation of solution B (NGC to provide only the Generating Plant Demand Margin to the BMRS)?	No
9. If you prefer solution B, provide a rationale for this decision.	
10. Will there be an impact on your organisation of implementing solution B?	No

11. What lead-time would be required by your organisation if solution B were to be implemented?
Month to familiar

**Approx 1
Become
with the
different
information**

From: Nick Skinner[SMTP:Nskinner@scpl.co.uk]
Sent: 31 August 2001 12:21
To: 'modifications@elexon.co.uk'
Cc: David Thomas; Jackie Palmer
Subject: P33 Consultation and Impact Assessment

On behalf of South Coast Power Ltd, I am pleased to confirm that, with regard to the P33 Consultation and Impact Assessment, SCPL would prefer that NGC continue to provide the 'surplus' to the BMRS ie formalise the status quo (solution C).

It appears to us that solution C provides the relevant margin information for commercial decisions. Our questionnaire answers are detailed below:

	<u>Party / Party Agent Response</u>
1. Do you support the implementation of the status quo (solution C)?	YES
2. Will there be an impact on your organisation of implementing the status quo (solution C)?	NO
3. What lead-time would be required by your organisation if the status quo (solution C) were to be implemented?	NONE
4. If a 'No' response was provided for question 1, do you prefer the implementation of solution A (NGC to provide both the 'surplus' and the Generating Plant Demand Margin to the BMRS)?	N/A
5. If you prefer solution A, provide a rationale for this decision.	
6. Will there be an impact on your organisation of implementing solution A.	N/A
7. What lead-time would be required by your organisation if solution A were to be implemented?	
6. If a 'No' response was provided for question 1, do you prefer the implementation of solution B (NGC to provide only the Generating Plant Demand Margin to the BMRS)?	N/A
7. If you prefer solution B, provide a rationale for this decision.	
8. Will there be an impact on your organisation of implementing solution B?	N/A
9. What lead-time would be required by your organisation if solution B were to be implemented?	

Nick Skinner, Energy Business Manager, South Coast Power Ltd

From: Libby Glazebrook[SMTP:Lglazebrook@edisonmission.com]
Sent: 29 August 2001 10:40
To: modifications@elexon.co.uk
Cc: industryliaisonteamroom@edisonmission.com
Subject: P33 consultation and impact assessment

Edison supports Solution C as it preserves the status quo and provides what was intended in the BSC.

Regards

Libby Glazebrook, Edison Mission Energy, 0870 238 5558

From: Fraser, Sue[SMTP:Sfraser@seeboard.com]
Sent: 04 September 2001 13:56
To: 'ccc@elexon.co.uk'
Cc: 'modifications@elexon.co.uk'
Subject: P33 Consultation and Impact Assessment

Please find attached SEEBOARD's response to CPC 040 requesting impact assessment on P33.

<<CPC 040 – SEEBOARD Response.doc>>

Sue Fraser for Dave Morton 0190 328 3465

No	Question	Party / Party Agent Response
1.	Do you support the implementation of the status quo (solution C)?	No
2.	Will there be an impact on your organisation of implementing the status quo (solution C)?	Yes
3.	What lead-time would be required by your organisation if the status quo (solution C) were to be implemented?	None - it is after all the status quo.
4.	If a 'No' response was provided for question 1, do you prefer the implementation of solution A (NGC to provide both the 'surplus' and the Generating Plant Demand Margin to the BMRS)?	No
5.	If you prefer solution A, provide a rationale for this decision.	
6.	Will there be an impact on your organisation of implementing solution A.	Yes
7.	What lead-time would be required by your organisation if solution A were to be implemented?	30 days
8.	If a 'No' response was provided for question 1, do you prefer the implementation of solution B (NGC to provide only the Generating Plant Demand Margin to the BMRS)?	Yes
9.	If you prefer solution B, provide a rationale for this decision.	In our view it is likely to be the cheapest option. We do not believe other BSC Parties will find the 'surplus' useful.
10.	Will there be an impact on your organisation of implementing solution B?	No
11.	What lead-time would be required by your organisation if solution B were to be implemented?	

From: saeed.patel@edftrading.com[SMTP:saeed.patel@edftrading.com]
Sent: 04 September 2001 13:39

To: ccc@elexon.co.uk
Cc: SMDConsulting@talk21.com
Subject: P33 Consultation and Impact Assessment

Please find the attached impact assessment on behalf of EDF Trading Limited in connection with modification proposal 33.

Regards

Saeed

(See attached file: Modification Proposal P33.doc)

Saeed Patel, Business Analyst, EDF Trading Limited, Tel 44 (0)20 7851 5025, Fax 44 (0)20 7851 7318

No	Question	Party / Party Agent Response
1.	Do you support the implementation of the status quo (solution C)?	Yes
2.	Will there be an impact on your organisation of implementing the status quo (solution C)?	Changes to BMRS web pages may have an impact in terms of data extraction.
3.	What lead-time would be required by your organisation if the status quo (solution C) were to be implemented?	1 month
4.	If a 'No' response was provided for question 1, do you prefer the implementation of solution A (NGC to provide both the 'surplus' and the Generating Plant Demand Margin to the BMRS)?	Not Applicable
5.	If you prefer solution A, provide a rationale for this decision.	Not Applicable
6.	Will there be an impact on your organisation of implementing solution A.	No
7.	What lead-time would be required by your organisation if solution A were to be implemented?	1 month
8.	If a 'No' response was provided for question 1, do you prefer the implementation of solution B (NGC to provide only the Generating Plant Demand Margin to the BMRS)?	Not Applicable
9.	If you prefer solution B, provide a rationale for this decision.	Not Applicable
10.	Will there be an impact on your organisation of implementing solution B?	Yes
11.	What lead-time would be required by your organisation if solution B were to be implemented?	At least 1 year

From: Lane, Danielle[SMTP:Danielle.Lane@centrica.co.uk]
Sent: 04 September 2001 16:30
To: 'ELEXON-Modifications'
Subject: P33 Consultation and impact assessment

Please find attached a response on behalf of BGT.

	<u>Party / Party Agent Response</u>
1. Do you support the implementation of the status quo (solution C)?	Yes
2. Will there be an impact on your organisation of implementing the status quo (solution C)?	No
3. What lead-time would be required by your organisation if the status quo	

(solution C) were to be implemented?

No impact

anticipated

4. If a 'No' response was provided for question 1, do you prefer the implementation of solution A (NGC to provide both the 'surplus' and the Generating Plant Demand Margin to the BMRS)?

5. If you prefer solution A, provide a rationale for this decision.

Prefer

option C

6. Will there be an impact on your organisation of implementing solution A.

7. What lead-time would be required by your organisation if solution A were to be implemented?

8. If a 'No' response was provided for question 1, do you prefer the implementation of solution B (NGC to provide only the Generating Plant Demand Margin to the BMRS)?

9. If you prefer solution B, provide a rationale for this decision.

10. Will there be an impact on your organisation of implementing solution B?

12. What lead-time would be required by your organisation if solution B were to be implemented?

From: Wills, Trevor (NESL)[SMTP:Trevor.Wills@northern-electric.co.uk]
Sent: 04 September 2001 17:02
To: 'modifications@elexon.co.uk'
Subject: 'P33 Consultation and Impact Assessment'

Please find attached Northern Electric's response for 'P33 Rectification of inconsistencies in terminology between the BSC and grid Code OC2'

Regards

Trevor Wills, Energy Analyst, Tel: 0191 210 2664, Mob: 07799 065463, Fax: 0191 210299, E-mail: trevor.wills@northern-electric.co.uk

<<TW025 - P33 Consultation and Impact Assessment.doc>>

4th September 2001

Modification Department
ELEXON
10th Floor
338 Euston Road
London
NW1 3BP

Dear Sir

Modification Proposal P33: Rectification of Inconsistencies in Terminology between the BSC and Grid Code OC2.

Northern Electric and Gas welcomes the opportunity to comment on modification P33 'Rectification of Inconsistencies in Terminology between the Grid Code OC2'.

Having considered the options outlined in the 'Initial Assessment of Modification Proposal P33', Northern Electric supports solution C.

No	Question	Party / Party Agent Response
1.	Do you support the implementation of the status quo (solution C)?	Yes
2.	Will there be an impact on your organisation of implementing the status quo (solution C)?	No
3.	What lead-time would be required by your organisation if the status quo (solution C) were to be implemented?	No lead time
4.	If a 'No' response was provided for question 1, do you prefer the implementation of solution A (NGC to provide both the 'surplus' and the Generating Plant Demand Margin to the BMRS)?	N/A
5.	If you prefer solution A, provide a rationale for this decision.	N/A
6.	Will there be an impact on your organisation of implementing solution A.	No
7.	What lead-time would be required by your organisation if solution A were to be implemented?	No lead time
8.	If a 'No' response was provided for question 1, do you prefer the implementation of solution B (NGC to provide only the Generating Plant Demand Margin to the BMRS)?	N/A
9.	If you prefer solution B, provide a rationale for this decision.	N/A
10.	Will there be an impact on your organisation of implementing solution B?	No
11.	What lead-time would be required by your organisation if solution B were to be implemented?	No Lead time

We hope that these comments are helpful,

Yours faithfully

Lesley Mulley, Industry Communications Manager, Northern Electric and Gas

From: Ballard, Terry[SMTP:Terry.Ballard@npower.com]
Sent: 04 September 2001 15:54
To: 'Modifications@elexon.co.uk'
Subject: P33 Consultation and Impact Assessment

Please find the attached response on behalf of the Innogy plc, Innogy Co-generation Trading Ltd, npower direct Ltd, npower northern Ltd, npower yorkshire Ltd, Yorkshire Electricity plc.

<<P33_Response.doc>>

Terry Ballard, 01905-340507, 07989-493038

Party / Party Agent Response

1. Do you support the implementation of the status quo (solution C)? **No**

2. Will there be an impact on your organisation of implementing the status quo (solution C)? **No**
3. What lead-time would be required by your organisation if the status quo (solution C) were to be implemented? **N/A**
4. If a 'No' response was provided for question 1, do you prefer the implementation of solution A (NGC to provide both the 'surplus' and the Generating Plant Demand Margin to the BMRS)? **Yes**
5. If you prefer solution A, provide a rationale for this decision.

In the interest of market transparency, it is important that market participants know the value of the 'Operational Planning Margin' which NGC are ascribing to the Generating Plant Demand Margin (primary data). If only the 'Surplus' (option C) or the Generating Plant Margin (option A) is provided, the market would have no knowledge of the value of any adjustments made or to be made to this data by NGC before applying it in accordance with the Grid Code/BSC.

6. Will there be an impact on your organisation of implementing solution A. **No**
7. What lead-time would be required by your organisation if solution A were to be implemented? **N/A**
8. If a 'No' response was provided for question 1, do you prefer the implementation of solution B (NGC to provide only the Generating Plant Demand Margin to the BMRS)? **N/A**
9. If you prefer solution B, provide a rationale for this decision. **N/A**
10. Will there be an impact on your organisation of implementing solution B? **N/A**
12. What lead-time would be required by your organisation if solution B were to be implemented? **N/A**

Scottish & Southern called on 5th September 2001 and confirmed that they preferred solution C, that there was no impact on them and also no lead time was required. They confirmed that an e:mail would be provided in due course to confirm this formally.

From: Sue Macklin[SMTP:Sue.Macklin@scottish-southern.co.uk]
Sent: 06 September 2001 15:39
To: ccc@elecpool.com
Subject: P33 Consultation and Impact Assessment

Following my telephone conversation with Ceri Hughes, yesterday, I confirm that SSE prefer Option C. The questionnaire is attached.

I would appreciate it if you would copy this to Gareth Forrester, Modifications Manager, and Ceri Hughes.

I apologise for the delay.

Sue, Tel: 01256 304123
 (See attached file: CPC040.doc)

No	Question	Party / Party Agent Response
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No	Question	Party / Party Agent Response
1.	Do you support the implementation of the status quo (solution C)?	Yes
2.	Will there be an impact on your organisation of implementing the status quo (solution C)?	No
3.	What lead-time would be required by your organisation if the status quo (solution C) were to be implemented?	N/A
4.	If a 'No' response was provided for question 1, do you prefer the implementation of solution A (NGC to provide both the 'surplus' and the Generating Plant Demand Margin to the BMRS)?	N/A
5.	If you prefer solution A, provide a rationale for this decision.	N/A
6.	Will there be an impact on your organisation of implementing solution A.	N/A
7.	What lead-time would be required by your organisation if solution A were to be implemented?	N/A
8.	If a 'No' response was provided for question 1, do you prefer the implementation of solution B (NGC to provide only the Generating Plant Demand Margin to the BMRS)?	N/A
9.	If you prefer solution B, provide a rationale for this decision.	N/A
10.	Will there be an impact on your organisation of implementing solution B?	N/A
11.	What lead-time would be required by your organisation if solution B were to be implemented?	N/A

From: NETA_SPOC[SMTP:NETA_SPOC@Scottishpower.plc.uk]
Sent: 05 September 2001 11:18
To: 'ccc@elexon.co.uk'
Subject: P33 Consultation and Impact Assessment

Please find attached ScottishPower's response to the consultation on Modification Proposal P33. If you have any problems with this email or its attachment, please do not hesitate to contact me.

Steve Field, Calanais for ScottishPower, Design Authority, Deregulated Services, Int - 700 2313
 Ext - 0141 568 2313, <http://asg.scottishpower.plc.uk>
 <<http://asg.scottishpower.plc.uk/>> (intranet)

Cathcart Business Park, Spean Street
 Cathcart, Glasgow, G44 4BE
 Telephone (0141) 568 2314/6
 FAX (0141) 568 2366

4
 September
 , 2001

Gareth Forrester
 Modifications Manager
 ELEXON Ltd
 3rd Floor
 1 Triton Square
 London
 NW1 3DX

Modification Proposals P33 – Rectification of inconsistencies in terminology between the BSC and Grid Code OC2

Dear Mr Forrester,

After consideration of the above proposal, please find below our comments in relation to the questionnaire: -

- 1. We support solution C - the implementation of the status quo.*
- 2. There will be no impact on our organisation of implementing the status quo.*
- 3. Approximately 2 weeks would be required for implementation of above.*
- 4. In view of (1) and (2) above, the rest of the questionnaire is no longer applicable.*

I trust you find these comments helpful, and please do not hesitate to contact me should you wish to discuss any points further.

Yours sincerely,

Man Kwong Liu, ScottishPower Plc and Manweb Plc

12.2 Responses to Detailed Level Impact Assessment

Below are the detailed responses which have been received:

From: Gardener, Rachael[SMTP:rachael.gardener@gpupower.co.uk]
Sent: 09 October 2001 09:49
To: 'CCC'
Subject: GPU POWER UK Responder to CPC049 - DLIA of Modification P33

Hello,

Please find that GPU POWER UK response is 'No Comment'.

thanks
Rachael Gardener

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

* 08457 353637 Ext: 09 – 3802, Fax: 01384 405177, Email:
rachael.gardener@gpupower.co.uk &
dcg@gpupower.co.uk

From: Ace Rachel[SMTP:rachel.ace@british-energy.com]
Sent: 09 October 2001 11:25
To: 'ccc@elexon.co.uk'
Subject: P33 consultation on DLIA

BE have the following comments:
If the data is required then BE believe that it should be provided on the BMRS. We do not need another BMRS being built by Elexon. From the information provided, why does it cost £65,000 to keep things as it is?

Regards

Rachel Ace
On Behalf of British Energy Power and Energy Trading, British Energy Generation,
Eggborough Power Ltd

From: NETA_SPOC[SMTP:NETA_SPOC@Scottishpower.plc.uk]
Sent: 09 October 2001 11:36
To: 'ccc@elexon.co.uk'
Cc: Sheikh, Abid; Leck, Meran
Subject: P33 Consultation and DLIA

Please find attached our response to the above.

Give me a call if you have any queries.
<<P33 consultation and DLIA response.doc>>

Regards

Man Kwong
Design Authority, Deregulated Services Calanais Ltd.
External phone: 0141 568 2314, Internal phone: 700 – 2314, Email:
mankwong.liu@calanais.com

Cathcart Business Park, Spean Street
Cathcart, Glasgow, G44 4BE
Telephone (0141) 568 2314/6
FAX (0141) 568 2366

9 October,
2001

Gareth Forrester
 Modifications Manager
 ELEXON Ltd
 3rd Floor
 1 Triton Square
 London
 NW1 3DX

[Modification Proposal P33: Consultation and DLIA](#)

Dear Mr Forrester,

After further consideration of the above proposal and the DLIA, I refer you to our previous comments at the assessment stage. While the latest proposal is not our preferred option, in view of the reduced cost from the original proposal, we have no substantive objection to the recommendation and may utilise the information at a later date.

I trust you find these comments helpful, and please do not hesitate to contact me should you wish to discuss any points further.

Yours sincerely,

Man Kwong Liu

Scottish Power UK Plc, Manweb Plc and Emerald Power Generation Ltd

From: Fraser, Sue[SMTP:SFraser@seeboard.com]
Sent: 09 October 2001 11:39
To: 'ccc@elexon.co.uk'
Subject: P33 consultation and DLIA

Please find attached SEEBOARD's response to this mod proposal.

<<CPC049 - SEEBOARD Response.doc>>

Sue Fraser
 for DAVE MORTON, 0190 328 3465

Id	Questions	Response (Select appropriate option for the Yes and No questions, otherwise provide a written response)	
A.	In view of the impact assessments outlined in this CPC, do you support the provision and publication of both the 'surplus' and the Generating Plant Demand Margin using the implementation approach specified in this CPC?	Yes	
B.	If a 'No' response was provided for question A, provide a rationale for this decision.	Rationale: N/A	
C.	Do you intend to use this additional information?	Don't know at this stage	

D.	If a 'Yes' response was provided for question C and there is an impact on your organisation, what lead-time would be required to implement the necessary changes?	Timescale: No Impact
F.	If you prefer another implementation approach, please specify this.	Alternative Implementation Approach:

From: Emma.Coates@yeg.co.uk[SMTP:Emma.Coates@yeg.co.uk]
Sent: 09 October 2001 11:59
To: ccc@elexon.co.uk
Cc: helen.lees@npower.com
Subject: RE: CPC049 - DLIA of Modification P33 - Response Required

Dear CCC,
 Npower Yorkshire have no objections to the above proposal.

If you have any queries, please let me know.
 Cheers, Emma Coates
 Business Analyst, Supply Design Authority Information Systems Services, Yorkshire Electricity,
 www.yeg.co.uk

(
 tel internal 780 5710 (or 780 5179)
 tel external 0113 289 5710
 fax internal 780 5120
 fax external 0113 289 5120
 e-mail emma.coates@yeg.co.uk

From: Lees, John[SMTP:John.Lees@npower.com]
Sent: 09 October 2001 12:05
To: 'ccc@elexon.co.uk'
Cc: Lees, Helen; NP - Grant, Ian; Ballard, Terry
Subject: Npower Ltd Reposnse to CPC49

Find attached the completed response form for CPC49 sent on behalf of Helen Lees, Npower Ltd's BCA.

<<Npower Ltd Response - CPC49.doc>>

In summary Npower Ltd's response is as follows, we support the provision and publication of both the 'surplus' and Generating Plant Demand Margin as specified in the CPC and it is our intention to use this additional information.

Should you require any further information or clarification please do not hesitate to contact me.

John Lees
 npower
 Industry Retail Design, Commercial Services
 Tel: 01905 340430, Mobile: 07989 492852, E-Mail: john.lees@npower.com,
<mailto:john.lees@npower.com>>

Id	Questions	Response (Select appropriate option for the Yes and No questions, otherwise provide a written response)	
		Yes	No
A.	In view of the impact assessments outlined in this CPC, do you support the provision and publication of both the 'surplus' and the Generating Plant Demand Margin using the implementation approach specified in this CPC?	Yes ✓	No

B.	If a 'No' response was provided for question A, provide a rationale for this decision.	Rationale:	
C.	Do you intend to use this additional information?	Yes ✓	No
D.	If a 'Yes' response was provided for question C and there is an impact on your organisation, what lead-time would be required to implement the necessary changes?	Timescale:	
F.	If you prefer another implementation approach, please specify this.	Alternative Implementation Approach:	

From: Carla Mulligan[SMTP:Carla.Mulligan@scottish-southern.co.uk]
Sent: 09 October 2001 13:33
To: ccc@elexon.co.uk
Subject: CPC 00049

Hi

Here is the completed form on behalf of SSE Generation Ltd, SSE Energy Supply Ltd, Keadby Developments Ltd and Keadby Generation Ltd.

Regards

Carla
 Tel:01256 304108
 (See attached file: CPC00049.DOC)

Id	Questions	Response (Select appropriate option for the Yes and No questions, otherwise provide a written response)	
A.	In view of the impact assessments outlined in this CPC, do you support the provision and publication of both the 'surplus' and the Generating Plant Demand Margin using the implementation approach specified in this CPC?		No

B.	If a 'No' response was provided for question A, provide a rationale for this decision.	<p>Rationale: Given that responses to the previous round of consultation were very close (9 out of 26 parties supported C, 10 out of 26 parties supported A and 5 Parties appear to be indifferent) and given the difference in implementation costs and timescale (cost associated with implementing A is almost 10 times that of C), we are surprised that further effort is being spent trying to find a solution that will incorporate Generating Plant Margin data per Option A.</p> <p>We recognise that the proposal in this CPC looks an alternative way of incorporating the Generating Plant. Demand Margin Data but this will still incur additional costs. Until they are clarified it is difficult to comment but we are concerned that additional costs are being imposed on parties that do not support modification proposals or do not intend using data. We are also concerned that once again this alternative is based on data being published via the Elexon Website. The web site was never intended for this purpose and this will only increase the amount of data being split between the BMRS and the Elexon web site. This causes confusion for participants and makes it much harder to interrogate or use the data.</p>	
C.	Do you intend to use this additional information?		No
D.	If a 'Yes' response was provided for question C and there is an impact on your organisation, what lead-time would be required to implement the necessary changes? N/A	Timescale:	
F.	If you prefer another implementation approach, please specify this. N/A	Alternative Implementation Approach:	

From: Libby Glazebrook[SMTP:LGlazebrook@edisonmission.com]
Sent: 28 September 2001 15:17
To: ccc@elexon.co.uk
Cc: industryliaisonroom@edisonmission.com
Subject: P33 consultation and DLIA

Please find attached our response to the DLIA on P33.

Libby Glazebrook, Edison Mission Energy, 0870 238 5558

(See attached file: Mod 33 DLIA.doc)

Id	Questions	Response (Select appropriate option for the Yes and No questions, otherwise provide a written response)	
		Yes	No
A.	In view of the impact assessments outlined in this CPC, do you support the provision and publication of both the 'surplus' and the Generating Plant Demand Margin using the implementation approach specified in this CPC?	Yes	No X

B.	If a 'No' response was provided for question A, provide a rationale for this decision.	Rationale: I have not been following this modification but my understanding is going with the preferred option will cost £140k comprising £21.5 K so that NGC can provide Generation Demand Plant Margin, £65.7k to change all the naming inconsistencies in the URS and on the BMRA and £52k for ELEXON to develop and test their website to accept the new data. This seems a lot of money to correct what initially started out as a simple misunderstanding between the BSC and NGC. How does this improve the efficiency of operation of the Balancing Mechanism?	
C.	Do you intend to use this additional information?	Yes - we would if it were made available but could also live without it if it was not published	No
D.	If a 'Yes' response was provided for question C and there is an impact on your organisation, what lead-time would be required to implement the necessary changes?	Timescale:	
F.	If you prefer another implementation approach, please specify this.	Alternative Implementation Approach: Issue a circular explaining the naming errors and do not spend any further money correcting them or search for a much lower cost solution.	

From: lina.shah@siemens.co.uk[SMTP:lina.shah@siemens.co.uk]
Sent: 02 October 2001 10:27
To: CCC
Subject: Re: CPC049 - DLIA of Modification P33 - Response Required

No impact and no interest for Siemens Metering Services (Wollaton - Nottingham)

Regards

Lina.

From: Tanner, Janice[SMTP:jyt@thames-power.com]
Sent: 04 October 2001 08:35
To: Elexon Change Management (E-mail)
Subject: P33 consultation and DLIA

Please find attached reply to CPC 049 on behalf of Barking Power.

Regards

Janice Tanner, Electricity Contracts Administrator, Barking Power Station, Chequers Lane, Dagenham, Essex, RM9 6PF

Tel: 020 8984 5175, Fax: 020 8984 5174, Email: jyt@thames-power.com

<CPC00049 reply.doc>

Id	Questions	Response (Select appropriate option for the Yes and No questions, otherwise provide a written response)	
A.	In view of the impact assessments outlined in this CPC, do you support the provision and publication of both the 'surplus' and the Generating Plant Demand Margin using the implementation approach specified in this CPC?	Yes ✓	No
B.	If a 'No' response was provided for question A, provide a rationale for this decision.	Rationale:	
C.	Do you intend to use this additional information?	Yes ✓	No
D.	If a 'Yes' response was provided for question C and there is an impact on your organisation, what lead-time would be required to implement the necessary changes?	Timescale: 4 months	
F.	If you prefer another implementation approach, please specify this.	Alternative Implementation Approach:	

From: Harvey, Corrina[SMTP:Corrina.Harvey@invensys.com]
Sent: 05 October 2001 10:32
To: 'CCC'
Cc: Project Office
Subject: RE: CPC049 - DLIA of Modification P33 - Response Required

IMServ Europe is not impacted in its roles as SVA HHDC/HHDA and therefore I have not completed the questionnaire attached.

From: edward.coleman@txu-europe.com[SMTP:edward.coleman@txu-europe.com]
Sent: 10 October 2001 10:56
To: ccc@elexon.co.uk
Subject: CPC0049

(See attached file: CPC00049r.doc)

Id	Questions	Response (Select appropriate option for the Yes and No questions, otherwise provide a written response)	
A.	In view of the impact assessments outlined in this CPC, do you support the provision and publication of both the 'surplus' and the Generating Plant Demand Margin using the implementation approach specified in this CPC?		No

B.	If a 'No' response was provided for question A, provide a rationale for this decision.	Rationale: A lot of money for very little benefit. Our preference would be to do nothing other than Elexon informing participants that Demand Margin was actually the same as Surplus under the Code and leave it at that until such time as the small changes could be rolled in with another BMRS project.
C.	Do you intend to use this additional information?	Yes
D.	If a 'Yes' response was provided for question C and there is an impact on your organisation, what lead-time would be required to implement the necessary changes?	Timescale: approximately 8 weeks.
F.	If you prefer another implementation approach, please specify this.	Alternative Implementation Approach: See above We would only use the data from the website if it was machine readable, if PDF format we would consider it a waste of time.

From: James.Hawkins@pgen.com [SMTP:James.Hawkins@pgen.com]
Sent: 11 October 2001 09:53
To: Ceri Hughes
Cc: Chris.Price@pgen.com
Subject: Re CPC Powergen Response
Ceri,

Apologies for not responding sooner.

Enclosed Powergen response.
(See attached file: P33 DLIA Comments.doc)

Regards
James.

11 October 2001

Dear Ceri,

Proposed Variation to BSC – Modification Proposal No: 33

Powergen UK plc ('Powergen') welcomes the opportunity to comment on the DLIA for modification P33. Powergen provides this response on behalf of itself and the following BSC Parties: Powergen Energy plc, Diamond Power Generation Limited, and Cottam Development Centre Limited.

Powergen support implementation using both the Elexon website & BMRA as included in point 2 on the CPC issued on the 25th.

Id	Questions	Response (Select appropriate option for the Yes and No questions, otherwise provide a written response)	
A.	In view of the impact assessments outlined in this CPC, do you support the provision and publication of both the 'surplus' and the Generating Plant Demand Margin using the implementation approach specified in this CPC?	Yes	
B.	If a 'No' response was provided for question A, provide a rationale for this decision.	Rationale: N/A	
C.	Do you intend to use this additional information?	Yes	
D.	If a 'Yes' response was provided for question C and there is an impact on your organisation, what lead-time would be required to implement the necessary changes?	Timescale: 3 Months	
F.	If you prefer another implementation approach, please specify this.	Alternative Approach: N/A	Implementation

Yours Sincerely
James Hawkins

Strategy & Regulation, Energy Trading, Powergen, 02476 42 4737.
