

ATTACHMENT 3 – CONSULTATION RESPONSES ON DRAFT MODIFICATION REPORT

The following submissions were received in response to the consultation on the draft Modification Report.

No	Company	File Number
1.	TXU Europe Energy Trading	P33_MR_001
2.	SEEBOARD	P33_MR_002
3.	Powergen UK plc	P33_MR_003
4.	British Gas Trading	P33_MR_004
5.	Scottish and Southern	P33_MR_005
6.	British Energy	P33_MR_006

P33_MR_001 – TXU Europe Energy Trading

Thank you for the opportunity to comment on this modification proposal. TXU Europe Energy Trading would like to make the following comments on behalf of all TXU Europe companies.

TXU does not support this modification proposal. We do not believe that the benefits of receiving this information outweigh the costs quoted by the central service provider to provide it.

Regards

Nicola Lea, Market Development Analyst

P33_MR_002 – SEEBOARD

We have no comments on this report at this stage. We believe the implementation date is possible, however, this can change depending on other higher priority requirements that may occur.

Sue Fraser

for DAVE MORTON, 0190 328 3465

P33_MR_003 – Powergen UK plc

P33 Report Comments

MODIFICATION PROPOSAL P33 – RECTIFICATION OF INCONSISTENCIES IN TERMINOLOGY BETWEEN THE BSC AND GRID CODE OC2

Thank you for giving us the opportunity to comment on this proposal. Powergen UK plc ('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 supports the Panel's recommendation that this proposed modification be implemented as outlined in the Modification Report.

Regards

Chris Price, Strategy & Regulation, Powergen UK Plc

P33_MR_004 – British Gas Trading

Modification Proposal 33: Rectification of inconsistencies in terminology between the BSC and Grid Code OC2

Thank you for the opportunity of responding to this modification proposal. British Gas Trading (BGT) support this modification and believe it will promote efficiency in the implementation and administration of the balancing and settlement arrangements.

We support the revised implementation approach suggested by the Modification Group as the most effective way of implementing the modification. We are disappointed however that the costs of implementation of what is a small change has such a high cost. We support the Panel's view that the

monthly maintenance costs of this modification are excessive as no new additional service has been introduced.

Yours faithfully

Danielle Lane, Transportation Analyst

P33_MR_005 – Scottish and Southern

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

We have no particular additional comments to make on this Modification Proposal at this time.

Regards

Garth Graham

P33_MR_006 – British Energy

To Modification Secretary, BSCCo

BSC Modification P33 - "Rectification of inconsistencies in terminology between the BSC and Grid Code OC2" - Report Comments

British Energy supports the pragmatic solution proposed in the report, which resolves an inconsistency and provides additional market data.

We note that the solution is not ideal but has been driven by cost and time considerations arising from the inflexibility of the BMRA service. It appears that the ability of BSCCo to publish market information in a flexible and efficient manner on behalf of BSC participants will continue to be compromised until the flexibility of the BMRA service is improved or alternative method(s) found.

Martin Mate for British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, Eggborough Power Ltd