

**Responses from P30 Definition Report Consultation**

Representations were received from the following parties:

<b>No</b>	<b>Company</b>	<b>File Number</b>
1.	Dynegy	P30_DEF_001
2.	Western Power Distribution	P30_DEF_002
3.	SEEBOARD	P30_DEF_003
4.	Scottish and Southern	P30_DEF_004
5.	Scottish Power	P30_DEF_005
6.	British Energy	P30_DEF_006
7.	Killingholme Power Ltd	P30_DEF_007

**P30\_DEF\_001 – Dynegy****Modification Proposal P30: Availability of market information to BSC parties and non-BSC parties.**

Dynegy believe that by publishing the line loss factor data centrally Elexon would contribute towards improving the information flows in the electricity market, increasing efficiency. We are aware that it is possible to gain access to line loss factor data by approaching individual distribution companies, however transparency would be improved by central publication of the data. Besides improving transparency the publication of line loss factor data will also contribute towards increasing efficiency by displaying the regional distribution losses. Access to such data allows purchasers to be aware of the distribution losses they are likely to encounter enabling them to make the most viable purchases and leading to the promotion of effective competition.

The publication of profiling regression data would also be beneficial towards improving the efficiency of the market. The release of profiling regression data allows buyers to improve their understanding of demand patterns amongst Non Half Hourly (NHH) customers by being able to calculate their varying Half Hourly (HH) demand. This is important for improving suppliers ability to balance their portfolios in the longer term, again an efficiency improvement for the market as a whole and ultimately a cost saver for customers.

The proposal also requests the publication of genset metered generation. Under the Electricity Pool this data was available to all market participants. Dynegy believe the release of such data should be made under the NETA due to genset metered generation enhancing market transparency.

Dynegy believe modification proposal P30 will better fulfils the requirement of condition 7A.3 (c) of NGC's Transmission Licence by promoting competition in the sale and purchase of electricity, through increasing the dissemination of market information leading to the transparency of the market.

Yours sincerely,

Rekha Patel  
Power Regulatory Analyst

**P30\_DEF\_002 – Western Power Distribution**

I am writing in response to the above on behalf of Western Power Distribution (South West) and Western power Distribution (South Wales).

We support making LLFs and Load Profiles more widely available to other industry participants if they consider this will be beneficial to them. We are in favour of any change which improves visibility of information that is necessary for more efficient operation of the market.

An alternate source of this information is the Condition 5 statement on DUoS, that is issued by all Distributors, and which is available on our website.

Yours sincerely

SARAH SCOTT  
Regulatory & Government Affairs Analyst  
Western Power Distribution  
0117 933 2237

**P30\_DEF\_003 – SEEBOARD**

With respect to the above mentioned modification, entitled "Availability of Market Information to BSC & Non-BSC Parties". The turnaround time for comments on this paper has been 3 days. Given it is not seen as an urgent modification and that a large number of other reports, further advanced in this process, are due back on Monday we are disappointed that this definition exercise has been rushed through. This seems to be backed up by details within this report as we have found it exceedingly difficult to understand the actual requirements of this proposal. As such our initial view would be for Elexon and proposer, with assistance from any modification group, to re-examine these requirements. This would enable a clearer picture for a new review cycle to be undertaken at a later date. That being said we have the following initial comments:

- We would be concerned over any likely changes to Intellectual Property Rights, given previous problems with the Pool Rules.
- What Line Loss Factors are being referred to, those that were for Stage 1 or Stage 2 metering, or both. This would lead to very different potential solutions and, therefore, costs.
- With respect to impact assessments BSCP509 is noted, there could also be impacts of BSCP28 and BSCP528 depending upon requirements.
- Given that details of Line Loss Factors always are passed through Elexon for authorisation by ISG/SVG we feel that this route could provide the basis of a distribution activity rather than from individual Public Distribution System Operators.

On a final point we are also unsure to which modification group this proposal would be taken. If this is known we would be interested in that information.

Dave Morton  
SEEBOARD  
0190 328 3465

**P30\_DEF\_004 – Scottish & Southern**

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

In view of the issues identified at the IWA stage, we agree with the recommendation of Elexon that the Modification proceeds to the Definition phase.

Regards  
Robert Hackland

**P30\_DEF\_005 – Scottish Power**

**BSC Modification Proposal P30 –  
Availability of Market Information to BSC Parties and Non-Parties**

After consideration of the Initial Written Assessment of this proposal, there are a number of issues that we believe must be clarified before the viability of the modification may be measured, concerning confidentiality, payment for data, transmission systems used, compliance with standards to receive data and commercial sensitivity. We therefore, agree with the recommendation in the Initial Written Assessment that this proposal be submitted to the Definition Procedure.

I trust that you find these comments helpful. However, if I can be of further assistance, please do not hesitate to contact me.

Yours faithfully,

David Nawrath  
ScottishPower Plc and Manweb Plc

**P30\_DEF\_006 – British Energy**

BSC Modification Proposal P30 - Availability of Market Information to BSC & Non BSC Parties

On 7th August 2001, you invited comments on Modification Proposal P30 by 5pm on Friday 10th August, at the same time referring to Elexon's Initial Written Assessment of the proposal. We note that very little time has been given to provide comment.

British Energy does not support the proposal in its current form for the following reasons:

1. In some cases the data is outside the direct scope of the BSC (eg. EASL Profile Data, Distribution Line Loss Factor data).
2. In other cases, the data is poorly specified but is probably already available to BSC Parties through "flexible reporting" (assuming "Genset Metered Generation" equates to BM Unit Metered Volumes).
3. Whilst not objecting in principle to the release of data of the form suggested, and agreeing that the current reporting methods across the industry as a whole are far from ideal, we believe that a more thorough, detailed and considered proposal should be made. Elexon and BSC Parties should not be considered as a free resource (ultimately paid for by electricity customers) to work-up loosely defined proposals and individual wish-lists, especially at a time when the new arrangements and software are still "bedding down" and industry resources are already considerably stretched.
4. Whilst we do not object in principle to the release of data to non-BSC Parties, we do not consider the costs of achieving this should be borne by BSC Parties (and ultimately electricity customers) without a proper consideration of the benefits which might result.
5. Some market data is already freely available, for example on the NGC and Elexon websites, and there may be scope for making more data freely available. However, where there is an additional cost in providing additional data to Non-BSC Parties, or a volume issue, the additional cost should be borne by the requesting Non-BSC Party(s). This should not preclude BSC Parties from nominating agents to receive data they would otherwise receive.
6. The BSC should not become the de facto source of all market information without a proper consideration by the industry of the costs and benefits and where they lie, and the methods and alternatives available. More efficient and cost effective methods of making information available probably exist.

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

**P30\_DEF\_007 – Killingholme Power Ltd**

Killingholme Power Ltd have the following comments to make regarding Modification P030 "Availability of Market Information to BSC parties and non-BSC parties":

We agree that Line Loss Factor Data should be published as it is non-commercial data from a regulated market that should be freely available in the market domain.

We agree parties who are not suppliers should have access to Profiling Regression data. We appreciate that EASL has an Intellectual Property Right to this data and as such would support a proposal that this data should be sold under licence to such parties, rather than published on a website. Currently some suppliers can use this data to forecast whereas other market participants cannot. Thus the present imbalance of information causes bias in the market.

We do not support the proposal that genset metered generation data is published. Currently a BM unit's Physical Notifications are published on the NETA BM Reports website which should be sufficient information.