

23 May 2002

**URGENT MODIFICATION REPORT
MODIFICATION PROPOSAL P83 -
Amendment To Process For Past
Notification Errors (1)**

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

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1 SUMMARY AND RECOMMENDATIONS

1.1 Recommendation

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

The Proposed Modification, as set out in Section 8 of this report be made and implemented with immediate effect.

1.2 Background

The proposed Modification amends the period in P6.2.1 of the Code under which notice of claims for Past Notification Errors can be made, which was added to the Balancing and Settlement Code (“the Code”) by Modification Proposal P37 (P37). The Modification Report for P37 was sent to the Authority on 5 November 2001, and the Authority’s determination was published on 10 May 2002.

Modification Proposal P83 seeks to extend the period so as to allow more time for submitting claims and also allow for consideration of Modification Proposal P84 (P84). P84 seeks to adjust the basis of the Administration Fee for submitting claims. Paragraph P6.2.1 allows for a window of 5 Business Days after the Authority’s determination of P37 in which to submit notice of claims.

The size and nature of the Administration Fee was considered during the consideration of Modification Proposal P37.

The Panel had been convened at short notice and held by telephone conference call in order to consider Urgent Modification Proposal P83, pursuant to BSC B4.6. The Panel considered a draft Urgent Modification Report and the representations received in response to the consultation on Modification Proposal P83.

(All of the above reports can be found on the ELEXON website at <http://www.elexon.co.uk>).

1.3 Rationale for Recommendations

The Panel noted that the Authority had determined that Urgent Modification Proposal P37 had better facilitated the achievement of Applicable Code Objective (c) as set out in Condition 3 of the Transmission Licence. The Panel further noted that some Parties had found difficulty in executing the claims process within the time allowed. The Panel concluded therefore that implementation of Modification Proposal P83 would in effect facilitate the achievement of the intent of P37, and would therefore consequently also better facilitate the achievement of this objective.

The Panel also noted that it would allow detailed assessment to be made of Modification Proposal P84 which without the adoption of P83 would result in P84 being prejudiced prior to its assessment by the Panel.

The Panel noted that extending the deadline would not materially affect ELEXON’s costs.

The Panel noted that the 5-day window specified within paragraph P6 had been discussed and consulted upon. However, they further noted that these discussions were now some months in the past and that there had been significant events in the market in the meanwhile, which might have affected some Parties' ability to notify their claims.

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).

The modification procedures culminate in a modification report to the Authority, which normally contains the Panel's recommendation on whether or not a proposed modification should be approved and a proposed date for its implementation, together with a detailed assessment of the proposal in question. The report forms the basis upon which the Authority will decide whether to approve, direct or reject a modification proposal.

The Transmission Company or ELEXON may recommend that a Modification Proposal be treated as urgent, subject to approval by the Authority. The procedure for progressing an Urgent Modification Proposal is set out in Sections F2.9 and B4.6 of the Code. These urgent procedures allow the normal modification procedures to be circumvented as necessary to fit with the urgency of the matter. In such cases, the Authority will confirm the timetable and procedure that should apply. The timetable and procedure directed by the Authority must be adhered to, along with any other special instructions. A statement containing the reasons why the Panel (or Panel Chairman) consider the Proposal should be treated as urgent must be included in the Urgent Modification Report, together with a description of the extent to which the procedure followed deviated from the normal modification procedure.

Depending on the urgency of the matter, it may not be possible to establish a Modification Group or undertake detailed assessment of the modification proposal. The level of detail and analysis presented in this Urgent Modification Report therefore represents the full extent of relevant information regarding the modification proposal that could be collated within the time available.

4 DESCRIPTION OF PROPOSED MODIFICATION

Paragraph P6.2.1 of the Code currently states that:

“Where a relevant Contract Trading Party considers that there has been a Past Notification Error, such Party may make a claim to that effect by giving written notice of such claim to BSCCo, identifying the Past Notification Error and the relevant Settlement Period, provided that no claim of Past Notification Error may be made after the expiry of five Business Days after the date on which this paragraph 6 comes into effect.”

Paragraph 6 was effective from 20 May 2002 and the period for submission of claims in respect to this paragraph expires at 17:00 24 May 2002. Modification Proposal P83 suggests that the process of collating the relevant information in order to make such a claim is “more complex for Parties” and suggest an extension to the 5 Business Day deadline for the submission of claims.

5 DETAIL OF PROCEDURE AND TIMETABLE FOLLOWED

5.1 Statement of Urgency

Section F2.9 of the Balancing and Settlement Code makes provision for proposals to be treated as Urgent Modification Proposals upon the recommendation of the Transmission Company and BSCCo (ELEXON). Following representations from Innogy plc, ELEXON recommended to the Panel Chairman that Modification Proposal P83 be treated as an Urgent Modification Proposal.

The BSC Panel Chairman sought the views of a number of Panel Members. Some Panel members expressed concerns that urgency should only be granted for the reason that the completion of claims, by Parties, was proving more difficult than originally anticipated. The unanimous view of Panel Members contacted was that the Modification Proposal be treated as urgent. The Authority granted the Proposal urgent status for the purposes of Section F2.9 of the BSC on 22 May 2002 however noted that this urgency was granted due only to the “submission process deadline of 17:00 on Friday 24 May 2002”.

5.2 Procedure and Timetable

The Proposal was raised on 22 May 2002 by Innogy plc. Notification was sent to BSC Parties at 13:08 on 22 May 2002 informing them the Modification Proposal had been raised and reminded Parties that pending any Authority Decision on Modification proposal P83, the deadline for submission of claims under paragraph P6.2.1 of the Balancing and Settlement Code remained as 17:00 on Friday 24 May 2002. An Urgent Modification timetable was agreed with the Authority which included the following activities.

Proposal issued for consultation	15:00, 22 May 2002
Consultation Responses due back	09:00, 23 May 2002
Draft Urgent Modification Report to Panel	11:00, 23 May 2002
Panel consideration of draft Urgent Modification Proposal	13:00, 23 May 2002
Final Urgent Modification report to the Authority	14:00, 23 May 2002

A consultation document was issued on time on 22 May 2002 seeking views by 0900hrs on 23 May 2002. The responses to this consultation were considered by the Panel at its meeting at 13:00 on 23 May 2002. The responses are attached at Annex 1.

The Panel agreed to recommend the Modification Proposal to the Authority for implementation with immediate effect.

6 RATIONALE FOR PANEL RECOMMENDATIONS

The Panel noted that the Authority had determined that Urgent Modification Proposal P37 had better facilitated the achievement of Applicable Code Objective (c) as set out in Condition 3 of the Transmission Licence. The Panel further noted that some Parties had found difficulty in executing the claims process within the time allowed. The Panel concluded therefore that implementation of Modification Proposal P83 would in effect facilitate the achievement of the intent of P37, and would therefore consequently also better facilitate the achievement of this objective.

The Panel also noted that it would allow detailed assessment to be made of Modification Proposal P84 which without the adoption of P83 would result in P84 being prejudiced prior to its assessment by the Panel.

The Panel noted that extending the deadline would not materially affect ELEXON's costs.

The Panel noted that the 5-day window specified within paragraph P6 had been discussed and consulted upon. However, they further noted that these discussions were now some months in the past and that there had been significant events in the market in the meanwhile, which might have affected some Parties' ability to notify their claims.

7 SUMMARY OF REPRESENTATIONS

12 responses to the P83 Consultation were received, these responses represented 52 Parties. The numbers of responses were finely balanced between those that supported P83 and those that did not while, in terms of numbers of Parties, the majority opposed the implementation of the Modification Proposal. Of the 11 responses, 6 supported the Modification Proposal and 6 opposed it. In terms of Parties of the total of 49, 18 supported the proposal and 34 opposed it.

The arguments in favour of P83 were twofold. First the process of gathering the relevant information in order to submit a claim under paragraph P6 of the Code has been more complex and has tied up more resource than originally envisaged. Second that the extension of the deadline for submission of claims would allow due consideration of whether Modification Proposal P84 better facilitates the Applicable BSC Objectives. One response indicated that rejection of P83 would in effect lead to the rejection of P84. A number of respondents suggested that P84, if adopted, might lead to a reduction in the number of claims made. A response commented that it is important that claims made under paragraph P6 are accurate and further time would help ensure this.

The main arguments against the introduction of P83 are that the amount of time available for the submission of claims within paragraph P6.2.1 has already been considered as part of the discussions and consultation on P37 and therefore has been known since the submission of the report to the Authority on 5 November 2001. A number of responses comment that the implications of paragraph P6 in regard of both timetable and fees should have been clear to Parties since the submission of the Report to the Authority. Further information has been provided to Parties within ELEXON Circulars One respondent comments that “..it is not reasonable that the basis on which claims are submitted be thrown into confusion hours before the deadline”

8 LEGAL TEXT TO GIVE EFFECT TO THE PROPOSED MODIFICATION

The following text shall be amended in paragraph 6.2.1 of Section P:

6.2 Claiming Past Notification Errors

Where a relevant Contract Trading Party considers that there has been a Past Notification Error, such Party may make a claim to that effect by giving written notice of such claim to BSCCo, identifying the Past Notification Error and the relevant Settlement Period, provided that no claim of Past Notification Error may be made after the expiry of ~~five~~ ten Business Days after the date on which this paragraph 6 comes into effect.

ANNEX 1 - REPRESENTATIONS

Responses P83 Assessment Consultation

Consultation issued 22 May 2002

Representations were received from the following parties:

No	Company	File Number	No. Parties Represented
1.	Npower	P83_ASS_001	9
2.	Powergen	P83_ASS_002	1
3.	Edison Mission Energy	P83_ASS_003	4
4.	BP Gas Marketing	P83_ASS_004	1
5.	TXU Europe	P83_ASS_005	21
6.	SEEBOARD	P83_ASS_006	1
7.	Scottish and Southern Energy	P83_ASS_007	4
8.	Scottish Power	P83_ASS_008	5
9.	British Gas Trading Ltd	P83_ASS_009	1
10.	London Electricity	P83_ASS_010	1
11.	TotalFinaElf Gas & Power Ltd	P83_ASS_011	1
12.	British Energy (late response)	P83_ASS_012	3

P83_ASS_001 – Npower

This is the response on behalf of the following BSC Signatories:

Innogy plc, Innogy Co-gen Ltd, Innogy Co-generation Trading Ltd, NPower Direct Ltd, Npower Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd.

We support the proposal under P83 to extend the deadline under Para 6 of Section P of the BSC by 5 business days. We believe that this modification will better facilitate the BSC Applicable Objectives by allowing a related modification to be fully evaluated thus potentially reducing the number of instances to be considered under the recently approved claims process.

Regards,

Terry Ballard

P83_ASS_002 – Powergen

Powergen supports Modification P83, in order to allow proper discussion of the issues raised in P84.

Tim Johnson

Head of Business Change and Control
Energy Trading Department
Powergen plc

P83_ASS_003 – Edison Mission Energy

Thank you for the opportunity to respond to the urgent Modification Proposal P83. I am responding on behalf of Edison Mission Energy, representing BSC Parties First Hydro Company, Edison First Power and Lakeland Power.

We oppose the modification proposal and believe that the deadline for submissions should remain as 5 business days after BSC P6 comes into effect.

This is because

- 1) The 5 day deadline has been planned since the original legal drafting of P37, so any reasonable and prudent operator has had plenty of time in which to prepare its claim(s).
- 2) The 'defect' that P83 and P84 claim to address was clear from the original P37 drafting - i.e. multiple claims would be needed for a single error spanning a number of Volume Notifications. If this was a problem, an amendment to P37 should have been proposed rather than waiting until 2 days before the claims deadline.
- 3) It is not the case that anything has 'made the process of putting together claims significantly more complex' than could already have been expected a number of months ago.

We believe that the proposal does not support the BSC objectives. In particular it does not 'promote efficiency in the implementation and

administration of the balancing and settlement arrangements'. In fact the opposite is true - this proposal injects confusion into the implementation and administration of the BSC by casting doubt over the BSC P6 Claims deadline whilst prudent BSC Parties are preparing any claims to be submitted in 2 days time.

Regards,
Mark Edwards
Edison Mission Energy

P83_ASS_004 – BP Gas Marketing

BP Gas Marketing Ltd support proposal that the deadline for claims under Paragraph 6 of Section P of the BSC should be extended by 5 Business Days. The requirement for parties to submit multiple claims for a single error spanning a number of Volume Notifications places a complex and burdensome process upon already stretched resources. To this end, it is not unreasonable to allow parties sufficient time to prepare their claims, while ensuring that a definitive end point is prescribed.

This proposal would better facilitate the achievement of the Applicable BSC Objectives under condition C3, paragraph 3, (d) "promoting efficiency in the implementation and administration of the balancing and settlement arrangements", in that parties should be allowed time to enter correct claims to promote efficiency in the claims clearing process within the arrangements.

Best regards,

Ian M. Mullins
Regulatory Advisor

BP Gas, Power & Renewables

P83_ASS_005 – TXU Europe

The final legal drafting for P37 has been available since November last year. We believe that this should have provided sufficient opportunity for those wishing to prepare claims to do so. The drafting of P37 stated that the claim is in respect of each Notification that was in error and that claims would be required to be lodged within 5 working days of the Proposal being implemented. In view of this we do not feel that this Modification Proposal (P83) should be implemented.

Phil Russell
for 21 TXU BSC Parties

P83_ASS_006 – SEEBOARD

With respect to modification proposal P083. This part of BSC is one that we have always considered not to better facilitate BSC objectives. Its introduction was opposed by most BSC Parties on these grounds. We, therefore, feel that this change will not better facilitate BSC objectives and should be rejected.

Timescales within this paragraph were available for comment for several months during introduction of these facilities. BSC Parties had ample opportunity to have considered all aspects of these changes and proposed an amendment at that time.

Dave Morton
SEEBOARD Energy Limited

P83_ASS_007 – Scottish and Southern Energy

Dear Sirs,

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 Urgent Modification Consultation on Modification Proposal P83, contained in your note of 22nd May 2002, and in view of the linkage with P37, our comments on the question of do we believe that the deadline for claims should be extended by five business days is that we do NOT agree with this. For the avoidance of doubt, we feel that the Panel should recommend to the Authority that this Modification Proposal P83 be Rejected.

Our rationale is that BSC Parties have had plenty of time to consider the issues associated with P37. If there were issues etc., that they had, then they were provided with amply time during the P37 Consultation process to seek clarification of the issues now raised in P84, (for which a five day delay is now being sought via P83).

We also wish to point out that the timescale for assessing and submitting claims, under P37, is already very tight and it is not reasonable that the basis on which claims are submitted be thrown into confusion just hours before the deadline.

Regards

Garth Graham
Scottish & Southern Energy plc

P83_ASS_008 – Scottish Power

This response is submitted on behalf of Scottish Power UK Plc, Scottish Power Generation Limited, ScottishPower Energy Trading Limited, ScottishPower Energy Retail Limited and Emerald Power Generation Ltd.

ScottishPower fully supports P83 for Amendment To Process For Past Notification Errors. Our views on the question posed in the consultation paper are as follows:-

Do you agree that the deadline for claims under Paragraph 6 of Section P of the BSC should be extended by 5 Business Days ? – Yes.

The purpose of P83 is to allow an appropriate period of time to consider P84. P84 raises an important point in respect of claims to be submitted for erroneous contract notifications which should be addressed and resolved prior to the deadline for submitting claims. The effect of refusing P83, in practical terms, is to decide against P84 or at the very least prevent a proper consideration of it.

P84 proceeds on the basis of three suggested solutions to the problem identified. It is unrealistic to expect the principle to be considered and (in the event that there is support for the proposal) for the legal drafting to be resolved satisfactorily in the time available. P84 raises an issue which is relevant to the claims which, at present, must be submitted by Friday 24 May 2002. Parties should have the opportunity of considering that issue properly. It is difficult to see how any Party would be prejudiced if the deadline is extended to 31 May 2002 whereas if it is not P84 will effectively be refused.

We believe that P83 would better facilitate the achievement of the following BSC objectives:-

- (a) the efficient discharge by the Transmission Company of the obligations imposed under the Transmission Licence;
- (c) promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity;

By allowing a proper consultation as to whether P37 does discriminate against Parties due to the processes utilised by them and to avoid any ambiguity in the requirements to be met in submitting claims.

- (d) promoting efficiency in the implementation and administration of the balancing and settlement arrangements;

By allowing the Modification Proposal to be considered appropriately and potentially limiting the number of claims.

Mike Harrison
Scottish Power

P83_ASS_009 – British Gas Trading

Dear Sir

Urgent Modification Proposal 83: Amendment to Process for Past Notification Errors

Thank you for the opportunity of responding to this consultation on the above Urgent Modification Proposal. This response is on behalf of British Gas Trading Ltd.

We understand that this modification proposal has arisen as a consequence of a lack of clarity surrounding the rules and processes for claiming for past notification errors as recently implemented under Urgent Proposal 37. Although we would have some concerns if there were to be further extensions of the deadline for submission of claims, we believe that in this case there is justification for the extension. In Ofgem's decision letter which allowed the implementation of Modification P37 they state that in their view the changes would better facilitate BSC Applicable Objective as set out in Condition C3(c) because 'accurate notification of energy contract volumes is of the utmost importance to ensure the effective operation of the balancing and settlement mechanism and, therefore, the market.'. This reasoning should naturally extend to considering the claims for notification errors. We consider it essential that parties are able to submit *accurate* claims for Past Notification Errors. Allowing an extra five days in which claims may be submitted will, in our opinion, facilitate BSC Applicable Objective c) and d) by ensuring the most accurate information is made available to the Panel in making a determination.

Yours faithfully

Danielle Lane
Transportation Analyst
British Gas Trading Limited.

P83_ASS_010 – London Electricity

URGENT CONSULTATION ON P83

I refer to modification proposal P83, which was posted on Elexon's website last night.

The issues appearing to be covered by this proposal were discussed at length in the P37 modification process last year. We do not believe that the drafting of Section P6 of the BSC means, or is capable of meaning, what Innogy says it "seems" to mean.

We also believe that the matter has been clarified in Elexon's recent advice circulars on claims under Section P6.

We therefore consider that both this modification and the associated modification, P84, are unnecessary.

Roger Barnard
Regulatory Law Manager
LEG plc

P83_ASS_11 - TotalFinaElf Gas & Power Ltd

TotalFinaElf Gas & Power Ltd support the extension outlined in P83.

Regards,
Sharif Islam
Energy Regulation Manager
TotalFinaElf Gas and Power Ltd

P83_ASS_012 – British Energy

To: Modifications Secretary

From: Rachel Ace, British Energy

Date: 23 May 2002

British Energy does not believe the proposal to extend the period for raising claims for past notification errors would better meet the BSC Objectives. Parties which have made errors have had several months to identify errors and prepare claims. Neither operation of the transmission system, efficiency of the trading arrangements or competition are further promoted by increasing the scope to amend notifications which were submitted in full knowledge at the time that correction after gate closure was not permitted.

Rachel Ace

On Behalf of

British Energy Power and Energy Trading
British Energy Generation
Eggborough Power Ltd

ANNEX 2 – MODIFICATION PROPOSAL

Modification Proposal	MP No: 83 <i>(mandatory by BSCCo)</i>
Title of Modification Proposal <i>(mandatory by proposer):</i> Amendment To Process For Past Notification Errors (1)	
Submission Date <i>(mandatory by proposer):</i> 22 May 2002	
Description of Proposed Modification <i>(mandatory by proposer):</i> Modify paragraph P6.2.1 to extend the deadline for submission of claims to ten business days after paragraph 6 comes into effect.	
Description of Issue or Defect that Modification Proposal Seeks to Address <i>(mandatory by proposer):</i> The current drafting of paragraph P6 of the Code appears to require multiple claims for a single error spanning a number of Volume Notifications, with associated multiple £5000 fees. This makes the process of putting together claims significantly more complex for Parties and also may be considered to discriminate unduly against Parties using a multiple 'over-write' approach for Energy Contract Volume Notifications. A separate Modification is being proposed to address this issue. However, it is unlikely that this can be assessed and developed with appropriate legal drafting before the existing deadline for claims under Modification P37. This Modification enables a delay to the deadline to be agreed without prejudicing the decision on the other Modification Proposal.	
Impact on Code <i>(optional by proposer):</i>	
Impact on Core Industry Documents <i>(optional by proposer):</i>	
Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties <i>(optional by proposer):</i>	
Impact on other Configurable Items <i>(optional by proposer):</i>	

Modification Proposal	MP No: 83 <i>(mandatory by BSCCo)</i>
Justification for Proposed Modification with Reference to Applicable BSC Objectives <i>(mandatory by proposer)</i> : We believe this Modification Proposal will further the following BSC Objectives: (a) The efficient discharge by the Transmission Company of the obligations imposed under the Transmission Licence; (c) Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity - By avoiding undue discrimination between Parties due to the different nature of their processes; (d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements - By enabling a related Modification to be dealt with properly and potentially reducing the number of claims having to be submitted and processed by Elexon in respect of errors by some Parties.	
Details of Proposer: Name: David Tolley Organisation: Innogy plc Telephone Number: 01793-892650 Email Address: david.tolley@innogy.com	
Details of Proposer's Representative: Name: Richard Harrison Organisation: Npower Limited Telephone Number: 07989-494374 Email Address: richard.harrison@npower.com	
Details of Representative's Alternate: Name: Bill Reed Organisation: Innogy plc Telephone Number: 01793-893835 Email Address: bill.reed@innogy.com	
Attachments: NO If Yes, Title and No. of Pages of Each Attachment:	