



MODIFICATION REPORT
MODIFICATION PROPOSAL P033 –
Rectification of inconsistencies in
terminology between the BSC and
Grid Code OC2

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 Modification Proposal P033 (the Modification Proposal) 'Rectification of inconsistencies in terminology between the BSC and Grid Code OC2' and the resultant findings of this Modification Report, the Panel recommends to the Authority that:

The Proposed Modification as set out in Section 7 of this Modification Report be approved with an Implementation Date of 30th September 2002.

1.2 Background

The Modification Proposal was raised by the National Grid Company plc (NGC) on 10th August 2001. It seeks to modify the existing interface between NGC and the Balancing Mechanism Reporting Agent (BMRA) so that NGC provides the BMRA with both the 'OC2 derived surplus data' (which is currently being provided and is referred to as 'surplus' in the Grid Code) and the Generating Plant Demand Margin (which is not currently and should be provided) for publication on the BMRA website.

NGC are progressing changes to the Grid Code to support the Modification Proposal.

A consultation and High Level Impact Assessment (HLIA) was undertaken by Parties and the NETA Central Service Agent to establish if the present status quo should be formalised within the BSC and the Grid Code or whether alternative implementation approaches should be considered. Following analysis of the responses, in particular the excessive NETA Central Service Agent HLIA costs, the Modification Group (the Group) selected a revised implementation approach which would result in:

- 'surplus' being published on the BMRA website; and
- Generating Plant Demand Margin being published on the BSC Website.

The revised implementation approach was sent to Parties and the NETA Central Service Agent for a consultation and Detailed Level Impact Assessment (DLIA). Following analysis of the responses, including the reduced NETA Central Service Agent costs, the Group concluded that there was overall support for the revised implementation approach from Parties. The Group were all in favour of this revised implementation approach.

1.3 Rationale for Recommendations

The Panel were presented with the draft Modification Report on 15th November 2001. The Panel approved the Modification Report and agreed to recommend the Modification Proposal to the Authority with the Implementation Date of 30th September 2002. Section 6 details the specific Panel decisions.

The Panel endorses the Group's conclusions that the Modification Proposal would better facilitate the Applicable BSC Objectives as set out in the Transmission Licence. In particular, it would meet objective 7A(3)(d) 'promoting efficiency in the implementation and administration of the balancing and settlement arrangements'. The Modification Proposal has no impact on the remaining Applicable BSC Objectives set out in Condition 7A(3)(a - c).

In reaching this conclusion, the Panel took due account of the views of the proposer, all representations received from interested parties and the views of the Group, which are detailed in Section 9 below. This Modification Report should be read in conjunction with the Group's Assessment Report.

2 INTRODUCTION

This Report has been prepared by ELEXON Ltd., on behalf of the Panel, in accordance with the terms of the 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 Code (known as 'Modification Proposals'. These include procedures for proposing, consulting on, developing, evaluating and reporting to the Authority on potential modifications.

The 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 BSC 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 Code. 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

The full history of the events that have taken place relating to the Modification Proposal are included in Section 5 'Description and Assessment Against the Applicable BSC Objectives' of the Assessment Report. The Assessment Report forms Attachment 1 to this Modification Report.

Below is a summary of the events which have taken place.

Following the presentation of the Modification Proposal and the Initial Written Assessment to the Panel on 23rd August 2001, a consultation and HLIA was undertaken by Parties. Results of the consultation and HLIA are presented in the Assessment Report.

The Group reviewed the results of the consultation and HLIA at their first meeting on 5th September 2001. Although there was no consensus view from the responses received, the Group agreed that the majority of Parties preferred that both the Generating Plant Demand Margin and the 'surplus' should be provided, subject to costs. A HLIA, focusing on the provision of the two data items, was issued to the NETA Central Service Agent on 5th September 2001 and a detailed analysis request was issued to NGC on 7th September 2001.

The Panel was provided with an interim report at their meeting on 20th September 2001. This interim report included the responses received to the consultation and HLIA from Parties (including NGC) and the NETA Central Service Agent.

Following analysis of the NETA Central Service Agent costs, the Group concluded that publishing the two data items on the BMRA website was too costly and therefore a revised implementation approach was chosen resulting in:

- 'surplus' being provided by NGC for publication by the BMRA on the BMRA website; and
- Generating Plant Demand Margin being provided by NGC for publication by the BSCCo on the BSC Website.

Therefore a consultation and DLIA request was issued to Parties (including NGC) and the NETA Central Service Agent on 26th September 2001 on the revised implementation approach.

On 10th October 2001, the Group at their second meeting, reviewed the responses to the consultation and DLIA. Refer to Section 9.2 for the results of the consultation and DLIA.

The Group noted that the majority of Parties who responded supported the revised implementation approach. Following analysis of the responses and the reduced quotation provided by the NETA Central Service Agent resulting in a total development cost of £123,300¹, the Group therefore concluded that the revised implementation approach was the most appropriate:

- (a) because it achieved the objective of the Modification Proposal of publishing both the 'surplus' and the Generating Plant Demand Margin, although this information would not be published in the same place; and
- (b) on the basis that the NETA Central Service Agent costs for implementing the approach in the Modification Proposal (ie. provision of both 'surplus' and the Generating Plant Demand Margin by NGC for publication by the BMRA) was excessive (£596,900) when compared with the revised implementation approach total costs of £123,300 (resulting in the Generating Plant Demand Margin being published on the BSC Website and the 'surplus' being published on the BMRA website).

¹ Although the NGC development costs of £21,500 are included in this total cost, these costs will be recovered directly by NGC via their cost recovery mechanism.

The Group also concluded that as the changes impacted BSC Systems, the ELEXON BSC Systems Release 2 Project should manage the development of these changes with the proposed Implementation Date included in Section 1.1. This revised implementation approach was included in the Assessment Report which was presented to the Panel on 18th October 2001.

Following approval of the Assessment Report by the Panel on 18th October 2001, this Modification Report was produced by the Group. On 26th October 2001, the Modification Report was issued for consultation. Of the 6 responses received, the majority of the Parties supported the implementation of this Modification Proposal. Annex 1 includes the representations received.

The Panel were presented with the draft Modification Report on 15th November 2001. The outcome of the Panel decisions is included in Section 6.

5 DESCRIPTION OF PROPOSED MODIFICATION

The Modification Proposal will result in the 'surplus' being correctly identified as the information published on the BMRA website and the Generating Plant Demand Margin being published on the BSC Website.

Section 7 'Impact on BSC Systems' of the Assessment Report outlines the changes required to the BSC Systems and when the data items will be published.

The BSC changes are included in Section 7 of this Modification Report.

6 RATIONALE FOR PANEL RECOMMENDATIONS

On the basis of the analysis, consultation and assessment undertaken in respect of the Modification Proposal, the Panel recommends to the Authority that the Proposed Modification be approved.

The Assessment Report was presented to the Panel at their meeting on 18th October 2001. The Panel:

1. Noted that NGC were progressing the changes to the Grid Code;
2. Noted the Assessment Report and the recommendations of the Group;
3. Determined to support the recommendation of the Group and proceed to the Report Phase in accordance with BSC F2.7;
4. Decided to propose to recommend to the Authority that the Proposed Modification should be made;
5. Stated that it was satisfied with the reasons why the Proposed Modification would or would not better facilitate achievement of the Applicable BSC Objectives; and
6. Endorsed the proposed Implementation Date included in Section 1.1.

Although the Panel approved the Assessment Report, they believed that the monthly Operate and Maintain (O&M) costs quoted by the NETA Central Service Agent of £554.00 in the DLIA were excessive on the basis that no new additional service was being introduced because of this Modification Proposal (ie. their involvement is to remove a number of associated naming convention inconsistencies which exist on the BMRA website and associated documentation and continue to receive a file which is already being provided by NGC). ELEXON has discussed the monthly O&M costs with the NETA Central Service Agent. The ongoing O&M costs for all Modification Proposals are yet to be agreed, however for changes that are substantially non-software related, it is envisaged that there would be no ongoing O&M charge; however this is yet to be agreed contractually with the NETA Central Service Agent.

Although the Panel expressed concern over the proposed Implementation Date, the Panel supported the recommendation to issue an ELEXON Circular to Parties and the NETA Central Service Agent. This ELEXON Circular would:

- outline the agreement reached at the Panel meeting, whereby the existing status quo arrangement would continue until the Modification Proposal was implemented;
- highlight the inconsistencies in the Grid Code and BSC configurable items and outline the implementation approach to remove these inconsistencies by the Implementation Date; and
- outline the changes which would be implemented to deliver both data items on the respective websites by the Implementation Date.

It is proposed that the ELEXON Circular will be issued following the approval of the Modification Report by the Panel on 15th November 2001.

The Panel noted that the 'surplus' was currently being provided, albeit incorrectly labelled.

The Panel was presented with version 0.4 of the draft Modification Report on 15th November 2001 and were invited to confirm the recommendations in the draft report and to action ELEXON to finalise the report and submit it to the Authority for decision. ELEXON requested that the Panel noted that discussions were ongoing with the Central Service Provider on the issue of the monthly O&M costs. It

was believed that, as this was unlikely to involve a software change, that O&M costs would not be applied. However, this would have to be resolved contractually. The Panel:

- CONFIRMED the recommendation to the Authority contained in the draft Modification Report that Proposed Modification P033 be approved;
- CONFIRMED the recommendation that the Proposed Modification, if approved, should be implemented within the ELEXON BSC Systems Release 2 Project, with an Implementation Date of 30th September 2002;
- APPROVED the proposed text for modifying the Code as set out in the draft Modification Report;
- INSTRUCTED the Modification Secretary to make such changes to the draft Modification Report as required by the Panel and to submit the report to the Authority.

7 LEGAL TEXT TO GIVE EFFECT TO THE PROPOSED MODIFICATION

The legal text below has undergone review by the Modification Group, Parties and the ELEXON legal advisers.

The legal text below is based on the legal draft changes prepared for Modification Proposal P022. Any changes to the legal text for Modification Proposal P022 may impact the changes proposed below.

7.1 Conformed Version

7.1.1 Section Q 'Balancing Mechanism Activities'

Amend paragraphs 6.1.2 and 6.1.3 to read:

6.1.2 Not later than 1700 *hours* each Friday, the Transmission Company shall send to the BMRA the following data for each week from the 2nd week following the current week to the 52nd week following the current week:

- (a) the National Demand forecast expressed as an average MW value for the Settlement Period at the peak of the week;
- (b) the national *Surplus* ~~Generating Plant Demand Margin~~ forecast expressed as an average MW value for the Settlement Period at the peak of the week.

6.1.3 Not later than *1600* hours each day, the Transmission Company shall send to the BMRA the following data applicable for each Operational Day from 2nd day following the current Operational Day to the 14th day following the current Operational Day:

- (a) the peak National Demand forecast expressed as an average MW value for the Settlement Period at the peak of the day;
- (b) the national Surplus forecast expressed as an average MW value for the Settlement Period at the peak of the day.*

Add new paragraph to read:

6.4 Submission of generation data to BSCCo

6.4.1 In this paragraph 6.4²:

- (a) Generating Plant Demand Margin has the meaning given to that term in the Grid Code;*
- (b) times by which the Transmission Company is required to send data to BSCCo are target times, which the Transmission Company is expected to meet unless abnormal circumstances prevent it from doing so.*

6.4.2 The Transmission Company shall send to BSCCo the data set out in the table below with the frequency and by the times respectively set out in the table below:

<i>DATA</i>	<i>FREQUENCY</i>	<i>TARGET TIME</i>
<i>2–14 day ahead daily Generating Plant Demand Margin forecast (OCNMFDF) – daily peak half hour</i>	<i>Daily</i>	<i>16:00</i>

² The numbering used here does not take account of the specific changes for Modification Proposal P022 as they have not yet been approved by the Authority. If Modification Proposal P022 is approved, then the numbering and ordering of the text will change.

<i>values</i>		
<i>2–52 week ahead weekly Generating Plant Demand Margin forecast (OCNMFV) – weekly peak half hour values</i>	<i>Weekly</i>	<i>17:00</i>

Renummer existing paragraph 6.4 as paragraph 6.5.

7.1.2 **Section V ‘Reporting’**

Amend paragraph 1.1.5(a) to read:

1.1.5 The provisions of paragraph 1.1.4(b) are without prejudice to:

- (a) the obligations of the Transmission Company to send specified data to the BMRS *and BSCCo* pursuant to Section Q6;

Add a new paragraph 4.4 to read:

4.4 Generation data

4.4.1 BSCCo shall arrange for the data set out in Table 8 in Annex V-1 to be published on the BSC Website and revised from time to time as soon as reasonably practicable after BSCCo receives such data from the Transmission Company pursuant to Section Q6.4.

4.4.2 Where such data is received by BSCCo from the Transmission Company on a day which is not a Business Day or after the close of a Business Day, BSCCo shall publish such data on the BSC Website on the next following Business Day.

7.1.3 **Section V ‘Reporting, Annex V-1: Tables of Reports’**

Amend the following two rows in Table 1-BMRS to read:

DATA AND RELEVANT SETTLEMENT PERIODS	FREQUENCY	FORMAT	DEFAULT
2-14 day ahead National Margin Surplus forecast (<i>SPLD</i>) – daily peak half hour value	Daily	Tabular	Previous forecast
2-52 week ahead National Margin Surplus forecast (<i>SPLW</i>) – weekly peak half hour value	Weekly	Tabular	Previous forecast

Insert a new Table 8 in Annex V-1 to read:

TABLE 8 – GENERATION DATA PUBLISHED ON BSC WEBSITE

Notes:

- 1. In this table terms shall have the meanings given to them in Section Q6.4.***
- 2. Column 1 (data) specifies the data to be published and the day, week or other period to which the data relates.***

DATA
<i>2-14 day ahead National Generating Demand Margin forecast (OCNMFD) – daily peak half hour value</i>
<i>2-52 week ahead National Generating Demand Margin forecast (OCNMFV) – weekly peak half hour value</i>

7.1.4 **Section X 'Definitions and Interpretations', Annex X-2: Technical Glossary'**

Insert new definition 'surplus' (in appropriate alphabetic place) and amend the Generating Plant Demand Margin definition to read:

Defined Term	Acronym	Units	Definition/Explanatory Text
Generating Plant Demand Margin	OCNMFD <i>or</i> <i>OCNMFW</i>	MW	Has the meaning given to that term in OC2 of the Grid Code.
<i>Surplus</i>	<i>SPLD or SPLW</i>	<i>MW</i>	<i>Has the meaning given to that term in OC2 of the Grid Code.</i>

7.1.5 **Section X 'Definitions and Interpretations', Annex X-3: Glossary of Acronyms Applying Except In Relation To Settlement Section S'**

Add new acronyms to read:

Acronym	Units	Corresponding Defined Term or Expression
<i>OCNMFW</i>	<i>MW</i>	<i>Generating Plant Demand Margin (weekly)</i>
<i>SPLD</i>	<i>MW</i>	<i>Surplus (daily)</i>
<i>SPLW</i>	<i>MW</i>	<i>Surplus (weekly)</i>

Modify the existing acronym to read:

Acronym	Units	Corresponding Defined Term or Expression
OCNMFD	MW	Generating Plant Demand Margin <i>(daily)</i>

7.2 Clean Version

7.2.1 Section Q 'Balancing Mechanism Activities'

- 6.1.2 Not later than 1700 hours each Friday, the Transmission Company shall send to the BMRA the following data for each week from the 2nd week following the current week to the 52nd week following the current week:
- (a) the National Demand forecast expressed as an average MW value for the Settlement Period at the peak of the week;
 - (b) the national Surplus forecast expressed as an average MW value for the Settlement Period at the peak of the week.
- 6.1.3 Not later than 1600 hours each day, the Transmission Company shall send to the BMRA the following data applicable for each Operational Day from 2nd day following the current Operational Day to the 14th day following the current Operational Day:
- (a) the peak National Demand forecast expressed as an average MW value for the Settlement Period at the peak of the day;
 - (b) the national Surplus forecast expressed as an average MW value for the Settlement Period at the peak of the day.

6.4 Submission of generation data to BSCCo

- 6.4.1 In this paragraph 6.4:
- (a) Generating Plant Demand Margin has the meaning given to that term in the Grid Code;
 - (b) times by which the Transmission Company is required to send data to BSCCo are target times, which the Transmission Company is expected to meet unless abnormal circumstances prevent it from doing so.
- 6.4.2 The Transmission Company shall send to BSCCo the data set out in the table below with the frequency and by the times respectively set out in the table below:

DATA	FREQUENCY	TARGET TIME
2–14 day ahead daily Generating Plant Demand Margin forecast (OCNMFD) – daily peak half hour values	Daily	16:00
2–52 week ahead weekly Generating Plant Demand Margin forecast (OCNMFV) – weekly peak half hour values	Weekly	17:00

Renumber existing paragraph 6.4 as paragraph 6.5.

7.2.2 **Section V 'Reporting'**

1.1.5 The provisions of paragraph 1.1.4(b) are without prejudice to:

- (a) the obligations of the Transmission Company to send specified data to the BMRS and BSCCo pursuant to Section Q6;

4.4 Generation data

4.4.1 BSCCo shall arrange for the data set out in Table 8 in Annex V-1 to be published on the BSC Website and revised from time to time as soon as reasonably practicable after BSCCo receives such data from the Transmission Company pursuant to Section Q6.4.

4.4.2 Where such data is received by BSCCo from the Transmission Company on a day which is not a Business Day or after the close of a Business Day, BSCCo shall publish such data on the BSC Website on the next following Business Day.

7.2.3 **Section V 'Reporting, Annex V-1: Tables of Reports'**

DATA AND RELEVANT SETTLEMENT PERIODS	FREQUENCY	FORMAT	DEFAULT
2-14 day ahead Surplus forecast (SPLD) – daily peak half hour value	Daily	Tabular	Previous forecast
2-52 week ahead Surplus forecast (SPLW) – weekly peak half hour value	Weekly	Tabular	Previous forecast

TABLE 8 – GENERATION DATA PUBLISHED ON BSC WEBSITE

Notes:

- In this table terms shall have the meanings given to them in Section Q6.4.
- Column 1 (data) specifies the data to be published and the day, week or other period to which the data relates.

DATA
2-14 day ahead National Generating Demand Margin forecast (OCNMFD) – daily peak half hour value
2-52 week ahead National Generating Demand Margin forecast (OCNMFV) – weekly peak half hour value

7.2.4 **Section X 'Definitions and Interpretations', Annex X-2: Technical Glossary'**

Defined Term	Acronym	Units	Definition/Explanatory Text
Generating Plant Demand Margin	OCNMFD or OCNMFV	MW	Has the meaning given to that term in OC2 of the Grid Code.
Surplus	SPLD or SPLW	MW	Has the meaning given to that term in OC2 of the Grid Code.

7.2.5 **Section X 'Definitions and Interpretations', Annex X-3: Glossary of Acronyms Applying Except In Relation To Settlement Section S'**

Acronym	Units	Corresponding Defined Term or Expression
OCNMFD	MW	Generating Plant Demand Margin (daily)
OCNMFV	MW	Generating Plant Demand Margin (weekly)

Acronym	Units	Corresponding Defined Term or Expression
SPLD	MW	Surplus (daily)
SPLW	MW	Surplus (weekly)

8 ASSESSMENT

The following is a summary of the impacts identified in the Assessment Report produced by the Group, which forms Attachment 1 to this Modification Report.

- (a) Amendments will be required to a number of Sections of the Code. The relevant legal drafting can be found at Section 7 of this Modification Report;
- (b) There will be impacts on the BSC Systems;
- (c) There will be an impact on the Grid Code and NGC's systems and processes, though these are outside the governance of the BSC and are being progressed by NGC. It is intended that the changes will be implemented coincidentally;
- (d) There will be impacts on a number of Code Subsidiary Documents and other configurable items;
- (e) There will be an impact on those Parties who choose to use one or both data items within their own systems;
- (f) There is no impact on Party Agents;
- (g) There will be an increase in the payments due under the NETA Central Service Agent Contract;
- (h) The only Core Industry Document impacted by the Modification Proposal is the Grid Code. The changes are currently being drafted and will be presented to the Grid Code Review Panel in due course;
- (i) There will potentially be an increase in BSC Costs as a result of increased ELEXON helpdesk calls being logged by those parties wishing to know where the two data items are displayed and also if there are problems with the data provided by NGC for publication on the ELEXON Website; and
- (j) There is a minimal impact on the systems and processes of BSCCo as ELEXON will be managing the BSCCo Website and therefore will deal with any problems which may arise as a result of loading the NGC Generating Plant Demand Margin file. In addition the ELEXON helpdesk will need to know where the two data items are published to address any helpdesk calls which may be raised.

There is no impact on the statutory, regulatory and contractual framework within which the BSC sits.

9 SUMMARY OF REPRESENTATIONS

9.1 Consultation and High Level Impact Assessment

Copies of the original representations received under the consultation and impact assessment carried out in August 2001 and considered by the Group can be found in the Assessment Report.

9.2 Consultation and Detailed Level Impact Assessment

Copies of the representations received to the second consultation and DLIA, carried out in September 2001 and considered by the Group can be found in the Assessment Report.

9.3 Consultation on Draft Modification Report

6 representations were received in response to the consultation on the draft Modification Report representing the views of 12 Parties.

Refer to Attachment 3 (Consultation Responses on draft Modification Report) for the detailed responses.

The result of this consultation is as follows:

- 3 responses representing 6 Parties supported the implementation of the Modification Proposal;
- 2 responses representing 5 Parties stated that they had no comments on the Modification Report;
- 1 response representing 1 Party did not support the implementation of the Modification Proposal, on the basis that the Modification Proposal did not deliver any benefit to them; though they noted the revised reduced costs.

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