

Responses from P88 Draft Report Consultation

Consultation issued 23 September 2002

Representations were received from the following parties:

No	Company	File Number	No. Parties Represented
1.	Powergen Retail	P88_MR_001	1
2.	Seaboard Power Networks Plc	P88_MR_002	1
3.	Aquila Networks Ltd.	P88_MR_003	1
4.	Scottish & Southern Energy Ltd	P88_MR_004	4
5.	Innogy Plc.	P88_MR_005	9
6.	IMServ Europe Ltd.	P88_MR_006	1
7.	British Energy	P88_MR_007	3
8.	SEEBOARD Energy Ltd.	P88_MR_008	1
9.	LE Group	P88_MR_009	1
10.	ScottishPower UK Plc	P88_MR_010	6

P88_DR_001 – Powergen Retail Ltd

We are generally supportive of this modification as it will protect competition in the retail electricity market and will also facilitate competition in the provision of MAP and MAM services. This modification will assist in the implementation of REMA and will benefit suppliers when procuring for MAP/MAM services.

If you have any queries please let me know.

Regards,

AFROZE MIAH
Powergen Retail Ltd.

P88_MR_002 – Seeboard Power Networks Plc.

Seeboard Power Networks plc have no direct comments on the Modification Proposal P88, notwithstanding that other aspects of the implementation of REMA contains significant impacts on us and other industry participants.

Jonathan Purdy

P88_MR_003 – Aquila Networks Ltd.

Please find below Aquila Networks Plc response to P88 Consultation on draft Modification Report:

MSL HHMO rejects P88 for the following reasons:

1. Annex B states: "MOAs must obtain Equipment Owners' consent before metering assets are used in settlement". This impacts on HHMO and it is unclear why specific obligations are deemed to be required.
2. The Modification states that "party service line PSL110 will require amendment to include specific obligations on MOAs". Again, this impacts on HHMO and the obligations are unclear.
3. The Modification states that the D268 data flow in the BSC SVA data catalogue will require amendment to include the MAP ID. We reject this change, pending resolution of all outstanding appeals.

regards

Rachael Gardener

Deregulation Control Group &
Distribution Support Office
AQUILA NETWORKS

P88_MR_004 - Scottish and Southern Energy

This replaces our response, sent earlier this afternoon, on behalf of Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd. and SSE Energy Supply Ltd.

In relation to the Consultation on draft Modification Report P63, contained in your note of 23rd September 2002, we have the following comments:

We have no fundamental issue with either the technical solution or the proposed implementation date. However, when P88 was raised we stipulated the arrangements must be supported by adequate commercial safeguards. These safeguards, in the form of Ofgem guidance, are still not in place and we therefore do not believe that P88 should be implemented until these have been given. We have appealed the corresponding changes to the MRA on precisely these grounds and the appeal is currently with Ofgem for determination.

We think the use of the term Equipment Owner, in part 6 "Legal Text to Give Effect to the proposed Modification" is incorrect and should be changed to Meter Maintainer because they are the Elexon Accredited Agent. This will clarify which Market Participant Role the Supplier needs to notify to the SVAA.

Regards,

Sue Macklin
Scottish and Southern Energy plc

P88_MR_005 – Innogy Plc

Please find below our comments on behalf of Innogy plc, Innogy Cogen Limited, Innogy Cogen Trading Limited, Npower Limited, Npower Direct Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited and Npower Yorkshire Supply, regarding this proposal:-

* With reference to the new proposed paragraph 2.7.9, Section S of the BSC, we feel that the wording is confusing and a more appropriate format would be as follows:-

"In relation to each Non Half Hourly Metering System in relation to which it is registered in SMRS, and where the identity of an Equipment Owner is not currently held within Market Domain Data, a Supplier shall inform the SVAA in accordance with BSCP509 of the identity of the Equipment Owner (whether or not the Supplier itself), to enable such data to be included in Market Domain Data".

* The proposed date of 29 May 2003 is driven by the MRA changes that have been agreed at recent MDB meetings. However, presently only a partial solution has been agreed, and should the date move following appeals that are currently under consideration by Ofgem, then the implementation date needs to be realigned accordingly.

Thanks

Ros Parsons
npower

P88_MR_006 – IMServ Europe Ltd.

We have no comments for this report.

Many thanks.

Regards,

Kim Campbell
Project Planner

P88_MR_007 – British Energy

British Energy note that adherence to the terms of the proposed revised BSC would require agreement by Equipment Owners, who are not bound by the BSC. With a fully competitive arrangement for equipment provision this should not present any difficulty, but if competition is limited there would be potential for difficulties in obtaining the necessary agreement. We note that the Authority has explained that guidance would be issued to Suppliers and Distributors in October 2002 that would seek to address the industry concerns re the necessary contractual arrangements prior to the proposed implementation of REMA and P88, and hope this will successfully address the contractual issues.

British Energy believe that the costs of any software and/or procedural changes associated with this modification should be borne by suppliers, who are the expected beneficiaries in terms of obtaining more competitive metering services. Costs are not explicitly addressed in the report.

At a detailed level, we note:

Section 1.3: The statement that "Without such arrangements, there is a risk that the MAP/MAM would be able to operate effectively." presumably requires correction.

BSC Section X1 defines:

"Equipment Owner": means, in relation to a Metering System, a person which is the owner of Metering Equipment comprised in that Metering System but is not the Registrant of that Metering System;

Does this definition require amendment to cover the possibility of the Equipment Owner also being the registrant? (The possibility of the equipment owner not being the registrant is currently aimed at CVA registrations).

Regards

Rachel Ace

On behalf of:
British Energy Generation
British Energy Power and Energy Trading
Eggborough Power Ltd

P88_MR_008 – SEEBOARD Energy Ltd.

With respect to draft modification report for above mentioned modification proposal, dated 23rd September 2002. We agree with recommendation within section 1.1 of this report, but have some concerns regarding suggested legal text changes in section 6.

Section K changes would be sufficient if all Suppliers intend to contract directly with MAPs. However, this is unlikely to be the case. With that in mind we would suggest that this text should more accurately read:

2.4.6 Where a Supplier is to be the first Registrant in SMRS of a Non Half Hourly

Metering System at a new Boundary Point, and the Supplier is not the Equipment Owner, the Supplier, or their authorised Meter Operator Agent, shall

obtain the consent of the Equipment Owner to such registration.

If it is not possible to specifically put such an obligation in BSC then it might be necessary to make such changes to relevant Party Service Line with respect to such consent, and reference this from BSC.

Section S changes also need to be redrafted. Requirement is for an Equipment Owner to have details within Market Participant and Market Participant Role tables of Market Domain Data. This is not how these legal text changes are currently written and redrafting is required to clarify this point, otherwise notification will need to be sent to SVAA for every new Non Half Hourly metering system. Although Equipment Owners are not to be accredited if they are to pass data flows then they are likely to require use of Data Transfer Network and as such will need to be involved in some form of interface testing. Part of that process should be to register an entry with SVAA for inclusion in Market Domain Data. However, we have been unable to come to a reasonable definition of this fact to be included in section S of BSC as it seems to be more relevant to MRA. Perhaps this issue should be discussed with Gemserv to ascertain what is possible prior to final legal text changes being produced for this modification.

Dave Morton
SEEBOARD Energy Limited

P88_MR_009 – LE Group

With regard to BSC modification P88 "Introduction of obligations in relation to SVA Meter Operator Agents and Equipment Owners", LE Group support the proposed changes to the BSC with the following qualification.

The VAMG recommended P88 on the basis that it fulfils BSC applicable objective (d) "Promoting efficiency in the implementation and administration of the balancing and settlement arrangements". However, the modification depends on changes to the MRA that have yet to be fully agreed. If these changes are rejected or further revised we would like to see the modification either rejected or changed with further industry consultation, as it will no longer fulfil this BSC applicable objective.

We would also like to make the point that it is important to ensure the timing of the two sets of changes should be aligned.

Regards,

Alec Thompson

on behalf of Liz Anderson, Energy Strategy and Regulation Manager, LE Group.

P88_MR_010 - ScottishPower UK Plc

I thank you for this opportunity to comment on the above.

While we support this Modification in principle, we do not feel that it can be operated successfully in the absence of the necessary commercial agreements. While we recognise that contractual considerations do not lie within the scope of the BSC, we are anxious to ensure that the guidance offered by the Authority meets with Parties' requirements and is made available as soon as possible.

We also have some concerns over the implementation time scales suggested for P88, given that the progress of the five related MRA change proposals remains uncertain. We do not believe it appropriate to change the BSC in a manner that would create inconsistencies between the BSC and the MRA and would prefer that the Panel defer any decision on P88 until such times as the future of these related MRA change proposals is known.

We also note in section 6 of the report that the proposed wording for the new paragraph 2.7.9 (in Section S of the BSC) seems to indicate that the Supplier must notify the SVAA of the Equipment Owner for each and every NHH metering system to which the Supplier is registered. However, as it does not currently hold data at a metering system level, it is our view that the SVAA need only be notified of each different Equipment Owner used by that Supplier. If this is to be the case, then the text is misleading and should be amended.

I trust that you will find these comments helpful. Nonetheless, should you require further clarification of any of the above, please do not hesitate to contact me.

Yours Sincerely,

James Nixon
SAIC Ltd.

For and on behalf of: - **ScottishPower UK Plc / ScottishPower Energy Trading Ltd / SP Generation Ltd / Scottish Power Energy Retail Ltd / SP Manweb plc / SP Transmission Ltd**