

1 SUMMARY OF REPRESENTATIONS

Respondent	Support for P14	Issues/concerns	Other Comments
Scottish & Southern Energy	No	NGC conflict of interest	- Interaction with P12 - Questionable cost benefit
Seeboard	N/A		Not sufficient information to fully assess
Innogy	Neutral	- Decision moving from TDC to NGC - need extra safeguards in process	- Mods group needs governance expertise
TXU Europe	No	Decision moving from TDC to NGC	
British Energy	Principle –Yes Specifics - No	- NGC conflict of interest - Reduces transparency	- Improvements to Errors process required - Alternative suggested
Northern Electric	No	- Decision moving from TDC to NGC - need extra safeguards in process	Improvements to Errors process required
ScottishPower	Principle - Yes	need extra safeguards in process e.g. - fee applies - counterparty retains right to Error claim - frequency limits	- Want to assess Legal drafting of Code(s) - Parallel drafting of BSC & Grid Codes required
London Electricity	No	- Reduces transparency - Clarity of Offer-rescinding procedure - Impact of Offer-rescinding procedure on Participants	- Questionable cost benefit - Questionable contribution to BSC objective - Suggest at least 9 months before implementation to achieve stability & limited lifespan
Dynergy	Principle – Yes Specifics - No	- NGC conflict of interest - Decision moving from TDC to NGC - need extra safeguards in process	Suggest additional safeguards: - audit of NGC decisions by TDC with right to overturn
Powergen	No	- potential for abuse - NGC conflict of interest - Reduces transparency	Cites analogous position of Transco in Gas industry erroneously accepting capacity bids.