

Responses from P89 Draft Report Consultation

Consultation issued 29 July 2002

Representations were received from the following parties:

No	Company	File Number	No. Parties Represented
1.	BMRA	P89_MR_001	1
2.	Cornwall Consulting	P89_MR_002	1
3.	Scottish and Southern	P89_MR_003	4
4.	LE Group	P89_MR_004	1
5.	SEEBOARD	P89_MR_005	1
6.	British Gas Trading	P89_MR_006	1
7.	Scottish Power	P89_MR_007	5
8.	British Energy	P89_MR_008	1
9.	National Grid	P89_MR_009	1
10.	AEP Energy (late response)	P89_MR_010	1

P89_MR_001 – BMRA

Consultation response from David Hicks, design authority, on behalf of the BMRA (Service Provider).

In the report (section 6) it says “P89 seeks to align the Code with the BMRA and SAA Interface Specification which prescribes current practice” and “all relevant Transmission Company documentation and BSC Central Systems are assumed to be wholly consistent with the Interface Specification for the purposes of P89”.

There are two significant differences between the draft legal text and the Interface Specification. I believe the BMRA is consistent with the Interface Specification.

1. Re-Declarations of QPN

The draft legal text says that where the TC is notified of changes in MIL, MEL and QPN, “the Transmission Company shall send to the BMRA such changed data”.

However, the Interface Specification states:

BMRA and SAA Interface specification (NGC reference IS/24.12.001)

Gate Closure Data

All BM data submitted to, accepted and/or defaulted by National Grid for missing data (i.e. not rejected as a result of validation or consistency checks) will be made available. Data will be provided within a target time of 5 or 15 minutes (as appropriate) after each gate closure and for one settlement period only i.e. for the ½ hour period just closed. The following data will be made available for each BM unit:

- PN (PN – Physical Notification)
- Quiescent PN (QPN)
- Bid – Offer Data (BOD)
- Maximum Export Limit & Maximum Import Limit (MEL & MIL)

Acceptance Data

Acceptance data will be made available within a target time of 15 minutes of National Grid accepting a Bid – Offer. The following information will be contained within the data:

- Bid – Offer Acceptance Level (BOAL)

Re-Declaration

Re-declaration data will be made available within a target time of 5 minutes of National Grid accepting a re-declaration. The following information will be contained within the data:

- Dynamic Data
- Maximum Export Limit & Maximum Import Limit (MEL & MIL).

Only updates to the MEL & MIL data within the BM window will be sent.

Here it is clear that QPN is not included in the set of data covered by Re-Declaration. The BMRA System does not support updates to QPN. If QPN data is received where data already exists, the new data is rejected. To change the interface to allow electronic updating of QPN would require changes to the BMRA system.

2. Re-Declaration messages

In the legal text, it says (of notification of changes) "the Transmission Company shall send to the BMRA such changed data, and the time of notification and the effective time of such change".

The interfaces defined in the Interface Specification do not include the time of notification and so do not comply with the draft legal text. To include them would require changes to both the NGC and Logica systems.

P89_MR_002 – Cornwall Consulting

With regard to the above modification can you clarify that the 'bulk transfer' of data submitted via EDT to the BMRA at Gate Closure + 15 mins will not overwrite data submitted post Gate Closure via EDL. NGC currently sends revised MIL/MEL data to the BMRA at Gate Closure + 5mins and therefore this data could be overwritten by the 'bulk transfer' in the GC + 6mins to GC +15mins window. Are there BMRA processes which prevent this?

Lee Wood
Cornwall Consulting

P89_MR_003 – Scottish and Southern

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

Further to your note of 29th July 2002, and the associated Modification Report for P89, we agree with the proposed BSC Panel recommendation to the Authority that this Modification Proposal P89 should be made.

If the Modification Proposal P89 is approved, we agree with the proposed BSC Panel recommendation on the timing for the Implementation Date, as outlined in Section 1.1 of the Draft Modification Report.

Regards

Garth Graham
Scottish & Southern Energy plc

P89_MR_004 – LE Group

Thank you for the opportunity to comment. We agree that the timescales which the Transmission Company are adhering to with regard to the submission of MEL, MIL and QPN data to the BMRA are indeed not concurrent with the timescales as set out in the BSC. Additionally we agree that the BSC timescales should be aligned with the Transmission Company's operational

timescales for the submission of MEL, MIL and QPN data, as we strongly believe that this data should not be released to the BMRA until gate closure has passed for the Settlement Period to which it is pertaining.

However, with regards to the proposed legal text for paragraph Q6.1.10 of the BSC Code which is found in Section 5.1 of the Draft Modification Report, we are not certain that this legally enforces the intention of the modification. This intention is that the Transmission Company are obliged not only to;

* Send MEL, MIL and QPN data to the BMRA within 15 minutes following Gate Closure for the Settlement Period for which it is pertaining if received before Gate Closure, or

* Send MEL, MIL and QPN data within 5 minutes if received after Gate Closure,

but also it is obliged not to send this data before Gate Closure for the Settlement Period for which it is pertaining. We believe that the latter point probably needs to be more explicitly stated in the proposed legal text and would be willing to liaise (from a market participant standpoint) with the writers of the text concerning this point.

Rob Hetherington
for Liz Anderson, Energy Strategy & Regulation Manager
LE Group plc

P89_MR_005 – SEEBOARD

With respect to above mentioned modification and draft report dated 29th July 2002. We agree with recommendation detailed within section 1.1 of this report and implementation date detailed within that section.

Dave Morton
SEEBOARD Energy Limited

P89_MR_006 – British Gas Trading

Thank you for the opportunity of responding to this consultation. British Gas Trading Ltd (BGT) support this proposal. The approach outlined is a pragmatic solution and we agree that the changes proposed will better facilitate the Applicable BSC Objectives as stated in the final report.

Yours faithfully

Danielle Lane
Transportation Analyst

P89_MR_007 – Scottish Power

With reference to the above, we offer our support to P89: "Clarification of the Timescales for Submitting MEL/MIL Data to the BMRA" Modification Proposal.

We agree with the Panel that P89 better the Applicable BSC Objectives, clarifies and reflects the working practice already in place.

We have considered the legal drafting provided and agree that it is appropriate.

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,

Man Kwong Liu
Calanais Ltd.

For and on behalf of: - *Scottish Power UK Plc.; Scottish Power Energy Trading Ltd.; Scottish Power Generation Ltd.; Scottish Power Energy Retail Ltd.; SP Transmission Ltd.*

P89_MR_008 – British Energy

From: Rachel Ace
British Energy

The BSC requires NGC to forward MIL/MEL & QPN changes to the BMRA within 5 minutes of receipt. NGC custom and practice (which appears to align with Central Systems design) is to withhold this information until 15 minutes after the relevant Gate Closure period. This modification would change the BSC to align with NGC custom and practice. While we recognise the concerns raised by NGC we believe these are extreme examples and believe that as a general rule the more information that is made available to the market the more efficient and competitive that market will be. We are also concerned that this apparent information imbalance may distort energy markets given NGC's forward trading capability. We do not therefore support this proposed change.

P89_MR_009 – National Grid

As Proposer of P89 we have the following comments to make:

"We support the Draft Modification Report for P89. We agree that the proposed legal text will effect the Modification as intended.

One issue has been brought to light, namely that the drafting places an obligation on the Transmission Company to supply to the BMRA the "time of notification" of changes to MEL/MIL data received after Gate Closure. We

wish to make it clear that, the file sent to the BMRA contains a time which relates to the time of notification to the BMRA, not the time of notification to the Transmission Company. This is in line with the BMRA & SAA Interface Specification.

However, P89 does not seek to address this ambiguity, nor has this been introduced by P89, and for this reason we consider it appropriate to leave this wording within the new legal drafting."

If there are any queries, please call 024 7642 3967.

Regards
Richard Lavender

P89_MR_010 – AEP Energy

Thank you for the opportunity to comment on P89: Clarification of the Timescales for Submitting MEL/MIL Data to the BMRA. AEP Energy Services Limited is responding on behalf of the two AEP BSC participants. Our comments are as follows:-

We do not support the implementation of P89.

We do not believe that the general argument used - that the BSC should be brought into line with current practice to better facilitate the applicable objectives - is justifiable. This argument fundamentally undermines the BSC as a contract between all BSC signatories and sets a dangerous precedent.

We are already concerned that as an active trader NGC receives information on MEL/MIL at least 15 minutes ahead of the rest of the market.

We understand that currently NGC fulfils its obligation to send MEL/MIL changes to the BMRA within 5 minutes within the gate closure window but does not fulfil this obligation outside of gate closure, where it notifies BMRA within 15 minutes. We understand that this is the case outside of gate closure because this information is sent by EDT which is only read every 15 minutes. However we do not believe that this is sufficient justification to erode BSC participants' rights by removing the requirement on NGC to notify BMRA within 5 minutes. We believe that NGC should update its systems.

The BSC was negotiated on the basis that we would be moving towards real time balancing. The implementation of 1 hour gate closure was part of this process. Allowing NGC not to update its systems to move towards this goal to better facilitate the applicable objectives does not seem to fit with this philosophy: allowing NGC to change the BSC to ensure it does not need to update its systems is actually working against this philosophy.

NGC believes that the requirement to notify within 5 minutes extends BMRA data beyond the BM window and hence beyond the scope of the BSC.. Our understanding is that the only data produced which goes "beyond the

window" is via the margins, which are released on the BMRA reports. We would like a better explanation as to what information NGC believes is being released beyond the window and why this is a problem.

We would be happy to discuss these points further.

Regards

Megan Goss
AEP Energy Services Limited