



SEPTEMBER 2002

**ASSESSMENT REPORT FOR MODIFICATION
PROPOSAL P91 - Extension To Data
Provided To The Transmission Company In
The Tuos Report**

**Prepared by the Volume Allocation Modifications Group on
behalf of the Balancing and Settlement Code Panel**

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I DOCUMENT CONTROL

a Authorities

Version	Date	Author	Signature	Change Reference
0.1		ELEXON		Peer review/ Mod group review
0.2		ELEXON		Mod Group Review
0.3		ELEXON		Final review
1.0	6/9/2002	ELEXON		For Panel Decision

b Distribution

Name	Organisation
Each BSC Party	Various
Each BSC Agent	Various
The Gas and Electricity Markets Authority	Ofgem
Each BSC Panel Member	Various
Energywatch	Energywatch
Core Industry Document Owners	Various

c References

Ref.	Document Name
1	Initial Written Assessment for P91 (P091IWA), 12 July 2002
2	Statement of the Use of System Charging Methodology (Issue 2 Revision 0), 1 April 2002

Copies of the above documents can be found on the ELEXON website at www.elexon.co.uk.

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1 SUMMARY AND RECOMMENDATIONS

1.1 Recommendations

On the basis of the analysis, consultation and assessment undertaken in respect of this Modification Proposal during the Assessment Phase, and the resultant findings of this report, the Volume Allocation Modifications Group (VAMG) recommend that the Balancing and Settlement Code Panel ('the Panel'):

- **NOTE the P91 Assessment Report and the recommendations of the VAMG;**
- **ENDORSE the recommendation of the VAMG and proceed to the Report Phase in accordance with Section F2.7 of the Code;**
- **AGREE that the draft Modification Report should be issued for consultation and submitted to the Panel meeting on 17 October 2002; and**
- **AGREE that the draft Modification Report contain a provisional recommendation that P91 should be made with a calendar day Implementation Date of 17 March 2003 if an Authority decision is received by 15 November 2002, and a calendar day Implementation Date of 1 August 2003 if an Authority decision is not received by that date.**

1.2 Background

Modification Proposal P91 (P91) was raised by National Grid on 8 July 2002, and the Initial Written Assessment (Reference 1) was considered by the BSC Panel at their meeting on 18 July 2002. The Panel agreed to submit P91 to a 2 month Assessment Procedure.

P91 seeks to amend Annex V-1 of the BSC in order to enable the Transmission Use of System (TUoS) Report to include the split between half-hourly (HH) and non-half-hourly (NHH) metering data at the Balancing Mechanism Unit (BMU) level in addition to being aggregated to Supplier level.

1.3 Rationale for Recommendations

The VAMG believe that P91 would better facilitate the achievement of the following Applicable BSC Objectives as set out in paragraph 3 of Condition C3 of the Transmission Licence:

- (a) The efficient discharge by the Transmission Company of the obligations imposed under the Transmission Licence;
- (b) The efficient, economic and co-ordinated operation by the Transmission Company of the Transmission System;
- (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.

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. 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 Code.

An electronic copy of this document can be found on the BSC website, at www.elexon.co.uk.

3 MODIFICATION GROUP DETAILS

This Assessment Report has been prepared by the Volume Allocation Modifications Group (VAMG). The Membership of the Modification Group for P91 was as follows:

Member	Organisation
Justin Andrews	ELEXON (Chairman)
Emrah Cevik	ELEXON (Lead Analyst)
Kevin Broadbent	National Grid (Proposer)
Katherine Bergin	Scottish & Southern
Neil Magill	Scottish Power
Afroze Miah	Powergen
Alec Thompson	London Electricity
Bruce Wyatt	Innogy

4 DESCRIPTION AND ASSESSMENT AGAINST THE APPLICABLE BSC OBJECTIVES

4.1 The Proposed Modification

P91 was raised by National Grid on 8 July 2002, and the Initial Written Assessment (Reference 1) was considered by the Panel at their meeting on 18 July 2002. The Panel agreed to submit P91 to the Assessment Procedure for two months.

P91 seeks to extend the data provided to the Transmission Company in the TUoS Report. The requirements for the reporting of information by BSC Agents are described in Section V of the BSC. According to Table 7 in Annex V-1, the TUoS Report comprises various reports in respect of each Grid Supply Point (GSP) Group and Supplier. P91 seeks to amend Table 7 in Annex V-1 in order to enable the TUoS Report to include the split between HH and NHH metering data at the BMU level in addition to being aggregated to the Supplier level.

The Proposer states that if Licence Exemptable Generation (LEG) has been netted off against demand via the Supplier Volume Allocation (SVA) System, then the split between HH and NHH metering data is required at the BMU level to calculate Transmission Network Use of System (TNUoS) charges according to the Use of System Charging Methodology (Reference 2). The Proposer also believes that Suppliers are increasingly choosing to have more than one BMU within a GSP Group and want their TNUoS Charges to be calculated down to this level of detail.

In recognition of the above, the Proposer argues that Modification Proposal P91 would better facilitate the following applicable BSC Objectives: (b) which concerns the "efficient, economic and coordinated operation by the Transmission Company of the Transmission System"; and (c) which aims at "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".

4.2 Assessment of the Proposed Modification

The VAMG met on 22 July 2002 and 22 August 2002 to consider P91. The results of the VAMG analysis are summarised below:

The VAMG determined that the Transmission Company applies different charging methods for the HH and NHH metered demand of Supplier BMUs, as set out in the Statement of the Use of System Charging Methodology (Reference 2). Hence it is important that the Transmission Company is able to determine accurately the HH and NHH split of energy for each Supplier BMU. Currently, the Transmission Company receives a data flow (the D0083 file) from the Supplier Volume Allocation Agent (SVAA) which reports the HH and NHH metering split at the granularity of Market Participant ID, Grid Supply Point Group (GSP Group) ID and Settlement Period. If a Supplier has Base Supplier BMUs only, then the D0083 file contains all the necessary data for calculating the TNUoS Charge for each Supplier. However, if Suppliers register additional Supplier BMUs, all the data necessary for charging is not always contained in the D0083 file, and further data is required when any of the Supplier BMUs are involved in triad trading within a Class 4 Trading Unit. If a Supplier BMU is involved in triad trading, the Transmission Company needs to know the HH and NHH metering split at the BMU level. This is required to implement the TNUoS charging rules covering Triad trading as a Trading Unit according to paragraph 4.11 of the Statement of the Use of System Charging Methodology (Reference 2).

As a result of the analysis undertaken, the VAMG concluded that P91 would better facilitate the Applicable BSC Objectives (a), (b) and (c) as identified in Section 1.3 of this report.

The VAMG also determined that the lack of HH and NHH metering data at the BMU level has not, to date, prevented the implementation of the TNUoS charging rules, given the limited number of Suppliers with additional BMUs and the current composition of Trading Units. However, this situation is likely to change as a result of the implementation of Modification Proposal P7 - 'Allocation of Supplier Demand to the Same BM Unit in a GSP Group for all Suppliers in the Same Company Group'. The expected increase in additional Supplier BMUs and the formation of new Trading Units would give rise to a significant number of cases where the data required for accurate charging is not contained in the current D0083 file. As a result the VAMG determined that the Transmission Company should be allowed to receive a data file that will represent the HH and NHH metering data at a BMU level in addition to being aggregated to Supplier level¹. In light of this information, VAMG discussed whether the costs of implementing P91 should be targeted at BSC Parties or at the Transmission Company. The VAMG decided by a majority that P91 was raised largely as a result of the implementation of P7 and therefore the costs should be recovered through the usual mechanism.

The VAMG identified two implementation options that could provide the required data to the Transmission Company². The first option (Option 1) specified an enhancement to the current D0083 file. The second option (Option 2) envisaged the creation of a new data file within the TUoS Report. A Requirements Specification detailing these options was prepared and submitted to the SVAA and the developer of the SVA System for Detailed Level Impact Analysis (DLIA).

¹ The VAMG noted that the requirement is for this file to be provided to the Transmission Company only.

² The VAMG also discussed a third implementation option which envisaged that the Transmission Company could calculate the necessary data itself by receiving the D0269 flow. However, the Transmission Company felt that it would be unacceptable from an audit perspective to require the Transmission Company to re-calculate SVAA data.

The developer of the SVA Systems was asked to quote for the software and testing costs of both implementation options identified in the Requirements Specification. The SVAA was asked to quote for the testing and operational costs of both implementation options.

The details of the DLIA are included as Annexes 1 & 2 of this Report, and are summarised below:

The results of the DLIA indicated that the cost of the different implementation options would be very similar. The developer of the SVA System stated that Option 1 would cost £17,768 and Option 2 would cost £19,904 to develop³.

In addition, the SVAA was asked to quote for the possibility of creating a reporting process which would remain outside the SVA System and would only interrogate the existing database to output a relevant report. The DLIA response indicated that it would cost £22,350 to develop and implement the changes required. Furthermore, such a system would cost £745 per month to operate.

The DLIA results and consultation responses were received after the final VAMG meeting. A draft version of this report, containing the DLIA results and the consultation responses, was circulated by e-mail with responses also requested by e-mail. In view of the DLIA and consultation, the VAMG agreed that P91 should be implemented via the cheapest software solution, namely Option 1.

The VAMG also agreed to recommend that P91 should be made with a calendar day Implementation Date of 17 March 2003⁴ if an Authority decision is received by 15 November 2002. However, if an Authority decision is not received by that date, then scheduled upgrades to the SVA System and the impending implementation of P62 entail that the calendar day Implementation Date for P91 would have to be postponed until 1 August 2003. A calendar day implementation was justified by the fact that P91 would not affect settlement calculations but would enable the Transmission Company to receive additional data in the TUoS Report so that it can comply with its Licence obligations.

After the final discussion of the VAMG, it was recognised that all data relating to the 2002/2003 financial year would not be available in the TUoS Report until some time after the Implementation Date for P91. As the Transmission Company requires the data as soon as possible in order to calculate TNUoS charges, this would require a further ad-hoc report post implementation. The VAMG did not consider the cost associated with such an ad-hoc report.

4.3 Alternative Modification

The VAMG identified no Alternative Modification.

³ If the report for Dispute Runs were also to include the latest data for GSP groups *not* in the disputes process, the costs for the two options would rise to £24,969 and £27,471 respectively. As the inclusion of this data within the file for Dispute Runs had been identified by the Transmission Company as desirable but not strictly necessary, the VAMG decided to continue current practice with regard to Dispute Runs and send only data for the GSP Groups in the Dispute Run. It was also felt that sending all data for Dispute Runs is not viable from an operational perspective.

⁴ The developer of the SVA System identified savings of approximately £700 if the release and testing for P91 could be combined with the implementation of P62 on 1 August 2003. However, the Transmission Company stated that the new data is required as soon as possible to calculate TNUoS charges relating to this financial year. The VAMG agreed that P91 should be implemented as a standalone change. It is also felt that any interaction between the software implementations of P62 and P91 would involve additional risks.

5 IMPACT ON THE CODE AND BSCCO DOCUMENTATION

5.1 Balancing and Settlement Code

P91 requires changes to Table 7 in Annex V-1. Draft legal text is provided as Annex 4 of this Report.

5.2 Code Subsidiary Documents and BSCCo Memorandum and Articles of Association

Impact on BSCP 508 'BSC Procedure - Supplier Volume Allocation Agent' and the BSC SVA Data Catalogue.

6 IMPACT ON CORE AND OTHER INDUSTRY DOCUMENTS AND SUPPORTING ARRANGEMENTS

No impact identified at this time. The Data Transfer Catalogue (DTC) is not impacted because the D0083 flow from the SVAA to the Transmission Company does not use the Data Transfer Network (DTN). It is envisaged that the D0083 file for England and Wales should be renamed as a P flow.

7 IMPACT ON OTHER CONFIGURABLE ITEMS

Impact on the Business Process Model (BPM).

8 IMPACT ON ELEXON

No impact on ELEXON systems and processes.

9 IMPACT ON BSC PARTIES

No impact on BSC Party systems or processes. The TUoS Report is sent to the Transmission Company only.

10 SUMMARY OF REPRESENTATIONS

A consultation questionnaire seeking Party opinion on whether or not the Modification would better facilitate the achievement of Applicable BSC was issued on 22 August 2002. As several of the respondents noted, the results of the DLIA were not available at the time of consultation.

The questions asked during the consultation were as follows:

- **Q1.** The Volume Allocation Modification Group (VAMG) determined that P91 would further the Achievement of Applicable BSC Objective (a) by enabling the Transmission Company to fulfill its licence obligations. Do you agree with the VAMG's assessment?
- **Q2.** Do you believe that P91 further facilitates the achievement of Applicable BSC Objectives (b) and (c) as set out in the Modification Proposal?
- **Q3.** As a result of Modification P7, the Transmission Company requires additional data within the TUoS Report in order to implement its current charging rules. P91 has been

raised to enable the Transmission Company to receive the additional data. In recognition of this fact, do you agree with the view of the VAMG that the costs associated with P91 should be recovered from BSC Parties?

Ten responses, representing a total of 42 Parties, were received as a result of the consultation. The responses are attached as Annex 3 of this report and are summarised below:

The majority of respondents were supportive of the need for P91 although there were a number of alternative opinions, particularly on the issue of cost recovery.

Six respondents (36 Parties) agreed with the VAMG view that P91 would better facilitate the achievement of BSC Objectives (a), (b) and (c). One respondent (1 Party) felt that Objective (c) was irrelevant for P91 while agreeing with the VAMG assessment regarding Objectives (a) and (b). Two respondents (7 Parties) wholly disagreed with the VAMG and did not support P91, while one response (1 Party) was 'No Comment'.

Several respondents commented on the VAMG view that the cost associated with P91 should be recovered from all BSC Parties. Four respondents (11 Parties) argued that the cost of implementing P91 should be targeted at the Transmission Company and/or at the specific Parties whose TNUoS charges require the TUoS Report to contain HH and NHH data at the BMU level. One respondent (21 Parties) commented that while in theory it could be argued that the Transmission Company should pay for the additional data, in practice any Supplier could benefit from P91 and consequently the costs of this modification should be recovered in the usual manner.

The VAMG discussed the consultation responses by e-mail and also considered a draft version of the Assessment Report. One of the members wanted to emphasise that he would have preferred to discuss the cost issues in greater detail, but realised that this was not possible without jeopardising the Assessment Procedure timetable. Nevertheless, this member was willing to endorse the formal recommendations of the report, provided that it highlighted the lack of time for a further VAMG meeting and registered his opinion that the costs associated with P91 should be directed at the Transmission Company.

ANNEX 1 – BSC AGENT IMPACT ASSESSMENT

MP No.	91	Title	Extension To Data Provided To the Transmission Company In The TUoS Report
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BCA Name	Clive Mallinson	Assessor	SVA Agent	Date	28/08/02
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Costs

Option 1:

Testing an enhanced 'D0083' flow produced by the ISRA application

Software Acceptance Testing (SAT) will be performed under the Software Acceptance Testing service, which is charged separately. There will therefore be no additional costs for SAT as a result of this change.

Any additional testing that may be required, such as End to End Testing or System Integration Testing cannot be assessed until ELEXON has defined the test strategy, including the scope of testing and the responsibilities of the relevant parties.

Minor amendments will be required to the Data Marshalling and Logging Application tables to cope with the modified data flow. These changes will be carried out free of charge.

The SVA Agent considers that sending all data for Dispute Runs is not viable from an operational perspective with this option.

Option 2a:

Testing a new data file to be developed by Logica

SAT will be performed under the Software Acceptance Testing service which is charged separately, there will therefore be no additional costs for SAT as a result of this change.

Any additional testing that may be required, such as End to End Testing or System Integration Testing cannot be assessed until ELEXON has defined the test strategy, including the scope of testing and the responsibilities of the relevant parties.

Minor amendments will be required to the Data Marshalling and Logging Application tables to cope with the new data flow. These changes will be carried out free of charge.

Ongoing operational costs for this option, together with the viability of including all data for DF runs, cannot be determined until details of the solution proposed by Logica are available.

Option 2b:

Development and testing by the SVA Agent of a new reporting process to generate the required data file (not including all data for DF runs)

£22,350.00 to develop, test and implement a change to the Pool Application to produce a new data file (report), subject to the assumptions and comments below.

ELEXON witness testing of the new report has been included in the above estimate.

Any additional testing that may be required, such as End to End Testing or System Integration Testing cannot be assessed until ELEXON has defined the test strategy, including the scope of testing and the responsibilities of the relevant parties.

Ongoing operational costs: £745 per month.

Additional costs for including all data for DF runs

£2,980.00 to develop, test and implement a change to the Pool Application (dependent upon and additional to the above estimate) to include all data for DF runs.

Timescale implications

An estimate of the elapsed time for Option 2b is 3 months from receipt of order. This is dependent on no other development work from ELEXON taking priority.

Risks

1. Option 1 may increase the Volume Allocation Run (VAR) processing time, which might impact the ability to meet SVAA deadlines for output reports.
2. Option 2 would involve running additional processes once all VARs have been completed for the day. It is not clear at this stage that these additional processes could be run in time to achieve the same timescales for delivery of the new reports as for the existing D0083 reports.

Comments

1. In all cases, files will be distributed via Data Marshalling to NGC using the existing ISDN link.
2. For Option 2b, it is proposed that the new report will be created using the Pool Application after all VAR processing for the day has been completed.
3. NGC do not currently require the D0083 files for DF runs. They are not sent because they would overwrite the RF runs on the NGC system.

Assumptions

For Option 2b

1. The data required for the new reports can be extracted from the ISRA database and associated flat files without the need to resort to SSR input data or output reports.
2. BM Unit consumption data can be accumulated from the flat file IDF_AGTD_BM_CONSUMS

If any of these assumptions should prove incorrect, this may affect the estimated costs for Option 2b.

Exclusions

1. Software Acceptance Testing (covered by the SAT service).
2. Costs for additional testing requirements as a result of the test strategy to be defined by ELEXON.
3. Increased ISDN usage costs arising from the distribution of the new flow.

Recommendation

Not Applicable.

Impact assessment issued by SVAA to BSCCo Change Processes

Julian Sellen

28/08/02

ANNEX 2 – IMPACT ASSESSMENT BY THE DEVELOPER OF THE SVA SYSTEM

Logica Ref	LCRA202	Type	ELEXON Originated Change Request		Component	SVAA
ELEXON Ref	428SCL012 Mod P91					
Assessor Name	Kevin Wright	Assessor Location	Logica Project Team, Leatherhead	Date	28/08/2002	
<p>Title: Modification Proposal P91 - Extension to Data Provided to the Transmission Company in the TUoS Report</p> <p>Description</p> <p>P91 seeks to amend Annex V-1 of the BSC in order to enable the Transmission Use of System (TUoS) Report to include the split between half-hourly and non-half-hourly metering data at the Balancing Mechanism Unit (BMU) level in addition to being aggregated to Supplier level.</p> <p>The Transmission Company applies different charging methods for half-hourly (HH) and non-half-hourly (NHH) metered demand of Supplier BMUs, as set out in the Statement of the Use of System Charging Methodology. Hence it is important that the Transmission Company is able to accurately determine the HH and NHH split of energy for each Supplier BMU.</p> <p>The requirements specification for this change are given in ELEXON document P091RS v 1.0 (05/08/02) and clarified in discussions between James Shuker, Kevin Wright and Richard Ascough.</p> <p>The following assessments have been requested under this LCRA:</p> <p>(A) Standalone change</p> <p>(1) The following two implementation options are to be assessed as standalone changes</p> <p>(i) Enhancement to the D0083 file (TUoS Report) to contain the additional data</p> <p>(ii) Implementation of a new file to contain the additional data.</p> <p>(2) Within each option, the following additional optional change is to be assessed:</p> <p>When the current D0083 file is created, all data is reported for all GSP Groups with the exception of Dispute runs when only the GSP Groups affected are reported upon. It is required that the impact assessment should address the cost of sending all data for Dispute Runs.</p> <p>(B) Changes in conjunction with P62 development</p> <p>This option is the same as the Standalone option with the exception that the work will be undertaken in parallel with the P62 development.</p> <p>In responding to this LCRA Logica will endeavour to provide ELEXON with an indication as to any changes in the performance of the system.</p>						

Functional Response

Option A 1 (i) – Standalone enhancement to existing D0083 file

The current functionality will be enhanced to include rows for BM Unit data in the renamed D0083 file. The D0083 file will be renamed as the DTC contains the definition of the file and it will still be required in the Scottish Market. The definition of the new file will be:

ZHD		1		
ZPD		1		
RDT		1		
HDR		1		
GSP		0 - *		
	SUP		0 - *	
		SPX	0 - *	
		BMU	0 - *	
			BMV	0 - *
		TOT	1	

The exact flow type and field definitions will be agreed between ELEXON and Logica prior to the implementation of the change, however the SPX record will remain unchanged and contain the following record details:

SPX | Settlement Period Id | Settlement Period Label | GSP Group Take |
 ... Period Supplier Deemed Take | Period Corrected Supplier Deemed Take |
 Period Non-Corrected Supplier Deemed Take

For each SUP record one or more BMU sub-records will be written showing the BM Unit ID for each BM Unit valid on the settlement date. The BMU record will contain the following fields:

BMU | BM Unit ID | Default BM Unit Flag

For each BMU record one or more BMV sub-records will be written showing the Period Non-Corrected HH Allocated Volume and Period Non-Corrected NHH Allocated Volume for each BM Unit for the Supplier.. The BMV record will contain the following fields:

BMV | Settlement Period ID | Settlement Period Label |
 Period BMU HH Allocated Volume | Period BMU NHH Allocated Volume

The Period BMU Allocated Volumes will be calculated as per the Aggregated BM Unit Energy and Line Loss values on the SE1 record type on the D0296 report. These values will be added together, summed over all Consumption Component Classes and netted by adding Active Import and subtracting Active Export values. The values will then be reported by half-hourly and non-half-hourly values by using the Aggregation Type value defined on the Consumption Component Class.

These Period BMU HH Allocated Volume and Period BMU NHH Allocated Volume values will be reported to 4 decimal places.

Option A 1 (ii) – Standalone creation of new D0083 file

This option will be implemented as an alternative to option A 1 (i). The file specified in Option A 1 (ii) will be produced in addition to the D0083 file. Logica believes that the definition of the file should be as

follows:

ZHD	1
ZPD	1
RDT	1
HDR	1
GSP	0 - *
SUP	0 - *
BMU	0 - *
BMV	0 - *

The file's structure will be agreed between ELEXON and Logica prior to the implementation of the change. This option will also require a change to the client application on the Supplier Settlement and Reconciliation Reports screen, which will need to be amended to submit 2 reports when the TUoS checkbox is selected, or to provide another report type to allow users to submit a request for the D0083 separately from the new report type.

Option A 2 – *Enhancement to the data within the D0083 for Disputes*

Optionally, the functionality of the D0083 file (option A 1 (i)) or the new D0083 file (option A 1 (ii)) will be enhanced so that reports run for Dispute settlement runs will include GSP groups not in the disputes process. The substitute data will be taken from the latest available settlement run.

This enhancement is a larger change in that the report will need to select data from the RF run for GSP Groups not taking part in the DF run. The requirements specification seems to make the assumption that all GSP groups will participate in the RF run. While this may habitually be the case, this practice is not enforced within the SVAA software. Also, Logica believes that some thought ought to be given as to whether it would be desirable to distinguish between DF run data and RF run data on the report, which could be implemented by way of a flag. This will also need to be agreed prior to the implementation of the change. We have assumed in this assessment that it will not be possible to distinguish between the data from the DF or RF runs.

Option B – *Changes in conjunction with P62 development*

The functionality described above will be the same for Option B 1 (i), B 1 (ii) and B 2 as for A 1 (i), A 1 (ii) and A2. ELEXON will be able to make savings in the production of only a single release and in the amount of testing that they will have to undertake. The other costs will remain the same.

Risks

Logica consider this to be of low risk to the SVAA systems since the changes affect system outputs rather than settlement calculations.

Performance

Whilst Logica do not currently have the facilities to undertake full production testing we have tried to indicate below the expected changes in performance if these options were implemented.

Option A 1 (i) – *Standalone enhancement to existing D0083 file*

Logica consider this change to be fairly minor. The change is only to the creation of the TUoS report which is one of many reports produced at the end of the SSR Run. The additional data required to change the report will be obtained from reading the database table idb_consum_comp_classes. It is not envisaged that this will create a significant overhead on the production of the report. It should be noted that at the end of the SSR Run the process submits the report jobs and then terminates. It does not wait for the

reports to be completed. This means that the change of the report will not increase the SSR Run time.

Option A 1 (ii) – *Standalone creation of new D0083 file*

This change is also fairly minor, however in this instance an additional report is being produced. The performance of this report will be comparable to the existing performance of the D0083 report. Both these reports will be automatically created at the end of the SSR Run. It should be noted that at the end of the SSR Run the process submits the report jobs and then terminates. It does not wait for the reports to be completed. This means that the addition of an additional report will not increase the SSR Run time. The reports themselves are run on the queue *isra_sub*. This typically has a value other than 1 to allow multiple reports to be produced in parallel. In the worst case scenario the time to create the reports will be increased by the time taken to currently produce the D0083 report.

Option A 2 – *Enhancement to the data within the D0083 for Disputes*

This change will require the report to access data from more than one SSR Run and hence will increase the time to produce the report. However as stated above this will not impact on the time for the SSR run and many not have an significant impact on the time to produce all the reports at the end of the SSR run.

Other comments

This price does not include the copying of the SVAA live environment onto the PTS server or the running of any performance tests as part of the development process.

Quotation Price

The price for this Logica Change Request Assessment is:

Option A 1 (i) -	£17,768
Option A 1 (ii) -	£19,904
Option A 1 (i) + A 2 -	£24,969
Option A 1 (ii) + A 2 -	£27,471
Option B 1 (i) -	£17,056
Option B 1 (ii) -	£19,192
Option B 1 (i) + B 2 -	£24,257
Option B 1 (ii) + B 2 -	£26,759

ANNEX 3 – CONSULTATION RESPONSES

Responses P91 Assessment Consultation

Consultation issued 22 August 2002

Representations were received from the following parties:

No	Company	File Number	No. Parties Represented
1.	SEEBOARD	P91_ASS_001	1
2.	Campbell Carr Ltd	P91_ASS_002	0
3.	TXU Energy	P91_ASS_003	21
4.	LE Group	P91_ASS_004	7
5.	Scottish Power	P91_ASS_005	6
6.	NGC	P91_ASS_006	1
7.	British Gas Trading	P91_ASS_007	1
8.	Scottish and Southern	P91_ASS_008	4
9.	British Energy	P91_ASS_009	3
10.	Aquila Networks	P91_ASS_010	1

P91_ASS_001 – SEEBOARD

Company: SEEBOARD Energy Limited

Number of Parties represented: 1

Question	Response
Q1. The Volume Allocation Modification Group (VAMG) determined that P91 would further the Achievement of Applicable BSC Objective (a) by enabling the Transmission Company to fulfill its licence obligations. Do you agree with the VAMG's assessment?	YES Rationale:
Q2. Do you believe that P91 further facilitates the achievement of Applicable BSC Objectives (b) and (c) as set out in the Modification Proposal?	Possibly Rationale: Objective (b) could be better facilitated by this proposal. We do not though feel that competition is better facilitated by this proposal.
Q3. As a result of Modification P7, the Transmission Company requires additional data within the TUoS Report in order to implement	NO Rationale:

<p>its current charging rules. P91 has been raised to enable the Transmission Company to receive the additional data. In recognition of this fact, do you agree with the view of the VAMG that the costs associated with P91 should be recovered from BSC Parties?</p>	<p>Previous proposals have determined that costs should be borne by those requiring/utilising a proposal. Not all BSC Parties will trade in this manner and, therefore, gain anything from this change or require any changes from current reporting mechanism. Therefore, it would not be appropriate for BSC Parties not requiring such detailed reporting to fund this change.</p>
<p>Any further comments:</p> <p>Having considered potential impacts on SVA systems detailed within documentation we are concerned that testing focuses only on changes within modification. It is clearly stated that risks could occur, as SVA Systems are so complex. A full regression testing approach might be more appropriate to ensure most of risks in making changes to these systems can be mitigated.</p>	

P91_ASS_002 – Campbell Carr Ltd

Company: Campbell Carr Ltd
Number of Parties represented: 0

Question	Response
<p>Q1. The Volume Allocation Modification Group (VAMG) determined that P91 would further the Achievement of Applicable BSC Objective (a) by enabling the Transmission Company to fulfill its licence obligations. Do you agree with the VAMG's assessment?</p>	<p>NO</p> <p>Rationale:</p> <p>In order to calculate the relevant TNUoS charges correctly, the Transmission Company needs only the volumes of half-hourly and non-half hourly data by supplier by GSP Group. The number of BMUs in that GSP Group is not relevant. No evidence seems to have been brought forward that the transmission company was not able to make the calculation over the last year and therefore, the current TUOS report must be adequate.</p>
<p>Q2. Do you believe that P91 further facilitates the achievement of Applicable BSC Objectives (b) and (c) as set out in the Modification Proposal?</p>	<p>NO</p> <p>Rationale:</p> <p>The proposal makes it possible for the Transmission Company to provide a breakdown of TNUoS charges by BMU, which some suppliers are requesting. However, this is a convenience for those suppliers (who should be capable of the same apportionment based on their own figures) but does not add to efficiency in operation of the transmission</p>

	<p>system per se.</p> <p>By providing a breakdown by BMU for some suppliers, this offers a convenience for those suppliers but, by providing this unnecessary service to such suppliers, the implementation cost will be borne by all BSC Participants, which represents a cross-subsidy rather than a facilitation of competition.</p>
<p>Q3. As a result of Modification P7, the Transmission Company requires additional data within the TUoS Report in order to implement its current charging rules. P91 has been raised to enable the Transmission Company to receive the additional data. In recognition of this fact, do you agree with the view of the VAMG that the costs associated with P91 should be recovered from BSC Parties?</p>	<p>NO</p> <p>Rationale:</p> <p>No evidence has been given that the Transmission Company needs this breakdown in order to levy TNUoS charges correctly, and the implementation of P7 is certainly irrelevant to this. The cost should be borne by the Transmission Company who can then make a case to the Authority as to whether it can recover the money via TNUoS charges or else whether it can levy an additional charge on those CUSC parties who require a more detailed breakdown of TNUoS charges – both these factors are outside the BSC and should not be charged to BSC parties through trading charges.</p>
<p>Any further comments:</p> <p>With regard to additional services such as is being requested here, the Transmission Company should be treated the same as other BSC parties. Otherwise, trading charges will not be cost reflective.</p>	

P91_ASS_003 – TXU Energy

Company: TXU Europe

Number of Parties represented: 21

Question	Response
<p>Q1. The Volume Allocation Modification Group (VAMG) determined that P91 would further the Achievement of Applicable BSC Objective (a) by enabling the Transmission Company to fulfill its licence obligations. Do you agree with the VAMG's assessment?</p>	<p>YES</p> <p>Rationale: The proposal is designed to implement a Charging Methodology which is required by its Licence.</p>
<p>Q2. Do you believe that P91 further facilitates the achievement of Applicable BSC Objectives</p>	<p>YES</p>

(b) and (c) as set out in the Modification Proposal?	Rationale: It facilitates the implementation of P7 which was deemed to meet (c)
<p>Q3. As a result of Modification P7, the Transmission Company requires additional data within the TUoS Report in order to implement its current charging rules. P91 has been raised to enable the Transmission Company to receive the additional data. In recognition of this fact, do you agree with the view of the VAMG that the costs associated with P91 should be recovered from BSC Parties?</p>	<p>In theory, no. In practice we are content to agree to this.</p> <p>Rationale: If the logic of previous decisions is followed through, it could be argued that this report is required by a single entity (NGC) and as such it should pay for it.</p> <p>In practice any Supplier could elect to utilise P7 and in order to be invoiced appropriately this data would need to be available to NGC. Consequently we are content that the costs of this Proposal should be recovered in the usual manner.</p>
<p>Any further comments:</p>	

P91_ASS_004 – LE Group

Company: LE Group

Number of Parties represented: Seven (London Electricity Group Plc, London Electricity Plc, Jade Power Generation Ltd, Sutton Bridge Power Ltd, West Burton Power, London Power Network Plc and Eastern Power Network Distribution Ltd.)

Question	Response
<p>Q1. The Volume Allocation Modification Group (VAMG) determined that P91 would further the Achievement of Applicable BSC Objective (a) by enabling the Transmission Company to fulfill its licence obligations. Do you agree with the VAMG's assessment?</p>	<p>MAYBE</p> <p>Rationale: The BSC is not the instrument through which NGC fulfills all its licence obligations – it is not clear that this is appropriate in this case</p>
<p>Q2. Do you believe that P91 further facilitates the achievement of Applicable BSC Objectives (b) and (c) as set out in the Modification Proposal?</p>	<p>NO</p> <p>Rationale: Neither of these two applicable objectives are promoted by this modification.</p>
<p>Q3. As a result of Modification P7, the Transmission Company requires additional data within the TUoS Report in order to implement its current charging rules. P91 has been raised to enable the Transmission Company to receive the additional data. In recognition of this fact, do you agree with the view of the VAMG that</p>	<p>NO</p> <p>Rationale: As NGC is the only Party who will receive this information, we believe that they should bear the associated costs. BSC parties should not be expected to finance changes that are aimed at</p>

the costs associated with P91 should be recovered from BSC Parties?	NGC requirements.
<p>Any further comments:</p> <p>The consultation provided insufficient evidence on why the VAMG made the recommendations presented above and details of the discussion that took place.</p> <p>In particular, it would have been useful to know the cost of the proposed changes and the cost of alternative routes for NGC to access the information they need.</p>	

P91_ASS_005 – Scottish Power

Name: Man Kwong Liu

Company: SAIC Utility Group

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

Question	Response
<p>Q1. The Volume Allocation Modification Group (VAMG) determined that P91 would further the Achievement of Applicable BSC Objective (a) by enabling the Transmission Company to fulfill its licence obligations. Do you agree with the VAMG's assessment?</p>	<p>YES</p> <p>Rationale: There does appear to be a demand, arising out of the approval of BSC Mod P7, for more specific information to be provided to Suppliers about their TNUoS charges. As NGC requires more granular metered data (by BM Unit) in order to calculate those charges, it is appropriate for that data to be submitted to NGC.</p>
<p>Q2. Do you believe that P91 further facilitates the achievement of Applicable BSC Objectives (b) and (c) as set out in the Modification Proposal?</p>	<p>YES</p> <p>Rationale: There is a case for accepting that NGC needs more granular data in order to efficiently and economically manage the Transmission system. It is less clear how the provision of more specific data will promote competition in supply, other than a possible link between Suppliers receiving more accurate TNUoS charges and being able to compete more effectively as a result of greater certainty about their liability to NGC.</p>
<p>Q3. As a result of Modification P7, the Transmission Company requires additional data within the TUoS Report in order to implement its current charging rules. P91 has been raised to enable the Transmission Company to receive the additional data. In recognition of this fact,</p>	<p>YES</p> <p>Rationale: However, we note that no specific information has been made available in this consultation about how to implement P91. We would support P91 only if the solution identified is both least cost and least impact to</p>

do you agree with the view of the VAMG that the costs associated with P91 should be recovered from BSC Parties?	implement.
Any further comments: None.	

P91_ASS_006 – NGC

Company: National Grid

Number of Parties represented:

Question	Response
Q1. The Volume Allocation Modification Group (VAMG) determined that P91 would further the Achievement of Applicable BSC Objective (a) by enabling the Transmission Company to fulfill its licence obligations. Do you agree with the VAMG's assessment?	YES Rationale: The modification in particular will enable the Transmission Company to fulfil its Licence Obligations by charging customers in accordance with the Statement of Use of System Charging Methodology. This will further the applicable BSC Objective (a).
Q2. Do you believe that P91 further facilitates the achievement of Applicable BSC Objectives (b) and (c) as set out in the Modification Proposal?	YES Rationale: The Use of System Charging Methodology is in itself a means of ensuring the efficient & economic use of the system and promoting competition.
Q3. As a result of Modification P7, the Transmission Company requires additional data within the TUoS Report in order to implement its current charging rules. P91 has been raised to enable the Transmission Company to receive the additional data. In recognition of this fact, do you agree with the view of the VAMG that the costs associated with P91 should be recovered from BSC Parties?	YES Rationale: The modification was prompted by the increase in Suppliers choosing to have more than one BM Unit within a GSP Group and their requirement for TNUoS charges calculating down to this level. This additional information is also required to calculate charges in the case of embedded generation being netted off via the SVA system. The provision of this information at a greater level of detail will be of benefit to and is in response to requests from parties and therefore should be recovered via this route.
Any further comments:	

P91_ASS_007 – British Gas Trading

Company: British Gas Trading
Number of Parties represented: 1

Question	Response
<p>Q1. The Volume Allocation Modification Group (VAMG) determined that P91 would further the Achievement of Applicable BSC Objective (a) by enabling the Transmission Company to fulfill its licence obligations. Do you agree with the VAMG's assessment?</p>	<p>YES Rationale:</p>
<p>Q2. Do you believe that P91 further facilitates the achievement of Applicable BSC Objectives (b) and (c) as set out in the Modification Proposal?</p>	<p>YES Rationale:</p>
<p>Q3. As a result of Modification P7, the Transmission Company requires additional data within the TUoS Report in order to implement its current charging rules. P91 has been raised to enable the Transmission Company to receive the additional data. In recognition of this fact, do you agree with the view of the VAMG that the costs associated with P91 should be recovered from BSC Parties?</p>	<p>YES Rationale:</p>
<p>Any further comments: None</p>	

P91_ASS_008 – Scottish and Southern

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 Initial Assessment Consultation on Modification Proposal P91, contained in your notes of 22nd August 2002 we note that the Authority desires NGC to charge in a manner which requires the more detailed breakdown of settlements data requested in this Modification Proposal. It would therefore seem to be consistent with the BSC objectives and also logical to recover costs from BSC Parties.

Naturally, we urge, as part of the Assessment Phase, that careful consideration is given to finding the most cost-effective mechanism for providing the data (which is already available to suppliers).

Regards

Garth Graham
Scottish & Southern Energy plc

P91_ASS_009 – British Energy

P91: Extension to Data Provided to the Transmission Company in the TUoS Report

In principle, from an overall industry perspective, this is a desirable change which will facilitate Transmission Network Use of System charging by NGC in accordance with its TNUoS Methodology and Statement of Charges, and which in the broadest sense could be argued to have the potential to better facilitate the BSC Objectives of Transmission Licence Conditions C3.3(a),(b) and (c). However, until the costs have been properly established it is not clear that the modification would actually better meet the BSC objectives.

In any case, we believe that development, implementation and operational costs would be better targeted at NGC and recovered through TNUoS charging, which is where the potential benefits and efficiencies lie in practice. This seems a self-consistent model for cost and benefit allocation.

We do not consider that approval of modification P7 is directly relevant to this modification.

Martin Mate
for
British Energy Power & Energy Trading
British Energy Generation Ltd
Eggborough Power Ltd

P91_ASS_010 – Aquila Networks

Please find that Aquila Networks Plc response to P91 Assessment Consultation is 'No Comment'.

Regards,

Jason Guest on behalf of Rachael Gardener

Jason J Guest
Distribution Support Office
Aquila Networks plc

ANNEX 4 – PROPOSED TEXT TO MODIFY THE BSC

The Modification Group has reviewed the attached legal text and has confirmed that it addresses the defect raised in the Modification Proposal.

P91 affects the final row of Table-7 in Annex V-1 of the BSC.

Conformed Version:

TuoS Report	Daily	Transmission Company	Various reports containing GSP Group Take, Supplier Deemed Take by Settlement Period and/or Settlement Day in respect of each GSP Group and Supplier, <u>and/or half hourly and non-half hourly consumption by Settlement Period and/or Settlement Day in respect of each Supplier BM Unit.</u>
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Clean Version:

TuoS Report	Daily	Transmission Company	Various reports containing GSP Group Take, Supplier Deemed Take by Settlement Period and/or Settlement Day in respect of each GSP Group and Supplier, and/or half hourly and non-half hourly consumption by Settlement Period and/or Settlement Day in respect of each Supplier BM Unit.
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