

## Responses from P91 Draft Report Consultation

Consultation issued 26 September 2002

Representations were received from the following parties:

No	Company	File Number	No. Parties Represented
1.	National Grid	P91_DR_001	1
2.	British Gas	P91_DR_002	1
3.	Aquila Networks	P91_DR_003	1
4.	SEEBOARD Energy	P91_DR_004	1
5.	Scottish Power	P91_DR_005	5
6.	British Energy	P91_DR_006	1
7.	Powergen	P91_DR_007	1
8.	London Electricity	P91_DR_008	1
9.	Scottish and Southern	P91_DR_009	4

## **P91\_DR\_001 – National Grid**

I am responding as the proposer to the draft modification report that you issued on 26 September for P91.

Clearly as the proposer, I support the recommendation to proceed with the change to give us the additional data that we need to ensure that we can always calculate TNUoS charges in accordance with the Statement of Use of System Charging Methodology.

I would like to take this opportunity to remind you that we need to be able to access information on a BM Unit basis for the current financial year in order to complete initial reconciliation for Suppliers for 2002/3. Initial reconciliation invoices are due to be issued in mid-May 2003, and therefore we need to be able to access BM Unit data before then. Elexon (via Emrah Cevik) have suggested that you can provide the data directly as an interim measure for this year once the BSC is changed, and I have raised a call with the help desk to this effect. This will enable us to meet our obligations for this financial year, and then pick up data via the D83 file for next year once the software change is implemented.

An Implementation Date of 17 March 2003 will give us enough time to calculate initial reconciliation charges for 2002/3 in line with our licence obligations. However if implementation is deferred until 1 August 2003 for the BSC change then we will be forced to investigate with Ofgem alternative ways to calculate initial reconciliation charges in the absence of the necessary BM Unit data.

I note from the Headline Report to the last BSC Panel meeting that there is an action on Elexon to investigate whether an earlier implementation date may be achievable through the introduction of a workaround. I hope that you are able to bring forward the implementation date for the BSC change as a result of this investigation.

**Kevin Broadbent**

Implementation Manager (Commercial) – National Grid

**P91\_DR\_002 – British Gas**

Modification Proposal P91: Extension To Data Provided To The Transmission Company In  
The TUOS Report

Thank you for the opportunity to respond to The Draft Modification Assessment on  
Modification Proposal P91. British Gas supports the Draft Assessment Report. We agree with  
the views of the VAMG that it better facilitates the applicable BSC Objectives as detailed in  
the Assessment and with the recommendation that it

Yours Faithfully

Rob Cullender  
Senior Account Manager

**P91\_DR\_003 – Aquila Networks**

Please find that Aquila Networks Plc response to P91 Consultation on draft Modification Report is 'No Comment'.

regards

Rachael Gardener

Deregulation Control Group &  
Distribution Support Office  
AQUILA NETWORKS

## P91\_DR\_004 – SEEBOARD Energy

With respect to draft modification report for proposal P91 (Extension To Data Provided To The Transmission Company In The TUoS Report) dated 26th September 2002. Due to issues we raised previously we can only provide qualified support for this report.

We agree that this change should be made as it would assist those trading in this manner to operate efficiently. However, as we mentioned in our response to proposal's assessment consultation we do not feel that these costs should fall on all BSC Parties. Previous proposals have determined that costs should be borne by those requiring/utilising a proposal. Therefore, further work should be undertaken to provide a relevant costing structure for this proposal prior to its acceptance.

Dave Morton  
SEEBOARD Energy Limited

## **P91\_DR\_005 – Scottish Power**

### **P91 Draft Modification Report Comments**

With reference to the above, we wish to reiterate the view, which we have previously provided in support of Mod P91 - Extension to Data Provided to the Transmission Company in the TUoS Report, **only if** the solution identified is both least cost and least impact to implement. It seems that this has been proposed and therefore we would support the Panel's recommendation in this Report.

We also note that both NGC and Elexon raised issues at the last Panel meeting regarding the implementation timescales for P91, based upon the current proposed timescales provided in the Modification Report. Elexon indicated particular concern that there might be systems non-compliance with the BSC wording in certain circumstances. We would therefore suggest that efforts are made to ensure that the implementation timescales do not lead to such non-compliance as this would clearly lead to inefficiency in the trading arrangements. We have considered the legal drafting provided and agree that it is appropriate.

Yours Sincerely,  
Man Kwong Liu  
Calanais Ltd.

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

**P91\_DR\_006 – British Energy**

To: Modifications Secretary, BSCCo

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 question whether approval of modification P7 is directly relevant to this modification, or whether the need for this modification has arisen directly from changes in the Use of system Charging Methodology.

Rachel Ace  
for  
British Energy Power & Energy Trading  
British Energy Generation Ltd  
Eggborough Power Ltd

**P91\_DR\_007 – Powergen**

I write in response to the above consultation on behalf of Powergen UK plc, Powergen Retail Ltd, Diamond Power Generation Ltd and Cottam Development Centre Ltd.

We agree with the recommendation of the Panel that P91 should be implemented to assist the implementation of P7.

Yours sincerely,

Paul Jones  
Trading Arrangements

## P91\_DR\_008 – LE Group

LE Group have qualified support for the implementation of the change to the BSC proposed in BSC modification P91 "Extension to data provided to the Transmission Company in the TUoS Report", .

We do not agree that the modification is necessary for NGC to fulfill its charging obligation under its licence -we believe there are other ways NGC could obtain the necessary information. We also believe that NGC should itself bear the costs of obtaining the information it requires for charging, as this is not a BSC issue.

However, we accept that other routes to obtaining the information may prove more expensive overall. Therefore, pragmatically, we have no objection to the BSC modification provided that NGC pay for the costs of implementation.

In passing, we believe that the assessment consultation did not highlight this issue sufficiently, nor reflect the fact that about half the respondents questioned whether NGC should bear the cost of implementing the modification.

Regards,

Alec Thompson

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

**P91\_DR\_009 – 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 26th September 2002, and the associated Draft Modification Report for P91, we agree with the proposed BSC Panel recommendation to the Authority that this Modification Proposal P91 should be approved. In addition, we agree with the proposed BSC Panel recommendation on the timing for the Implementation Date, as outlined in Section 1.1 of the Modification Report.

Regards

Garth Graham  
Scottish & Southern Energy plc