

## Responses for P99 Assessment Consultation

Consultation issued 17 October 2002

Representations were received from the following parties:

No	Company	File Number	No. Parties Represented
1.	British Gas Trading	P99_ASS_001	1
2.	Western Power Distribution	P99_ASS_002	2
3.	Aquila Networks	P99_ASS_003	1
4.	Scottish and Southern	P99_ASS_004	4
5.	NGC	P99_ASS_005	1
6.	Scottish Power	P99_ASS_006	5
7.	Npower	P99_ASS_007	9
8.	British Energy	P99_ASS_008	3
9.	LE Group	P99_ASS_009	8
10.	IMServ	P99_ASS_010	1
11.	SEEBOARD	P99_ASS_011	1

P99\_ASS\_001 – British Gas Trading

BSC Parties are invited to provide their response on the questions below.

<b>Respondent:</b>	Name <b>Andrew Latham</b>
<b>Responding on Behalf of</b>	Please list all Parties responding on behalf of (including the respondent company if relevant). <b>British Gas Trading Limited</b>
<b>Role of Respondent</b>	(BSC Party/Other – please state) <b>BSC Party</b>

<b>Respondent:</b>	
<b>Representing (please list all Parties)</b>	
<b>Question</b>	<b>Response</b>
1. Do you believe that P99 would better facilitate Applicable BSC Objectives (c) and (d)?  If No, please give reasons for your response.	<b>Yes/No Yes</b> Rationale:
2. Would your organisation be interested in using the Data Transfer Network (DTN) for PARMS data submission, rather than using the current email method?	<b>Yes/No No.</b> Rationale: <b>Currently this would have an impact on our systems and would require a 6 month lead time. Although if this service was provided as add on so when updates to systems were carried out we could consider the DTN at the appropriate date.</b>
3. Do you agree with the proposed implementation strategy in relation to the PARMS improvements, with pre- and post-implementation workshops held by BSCCo (with timescales subject to participant lead times)?	<b>Yes/No Yes although we would require full documentation to be made available some 3 months pre go live as well as the pre-post workshops.</b>
4. Do you believe that there are any alternative solutions that the Modification Group should consider?	<b>Yes/No No</b> Rationale:
5. Does P99 raise any issues that you believe have not been identified so far and that should be progressed as part of this Assessment Procedure?	<b>Yes/No No</b> Rationale:

6. Do you have any further comments on P99 that you wish to make?	No
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**P99\_ASS\_002 – Western Power Distribution**

<b>Respondent:</b>	<i>Graham Smith</i>
<b>Responding on Behalf of</b>	<i>Western Power Distribution (South West); Western Power Distribution (South Wales)</i>
<b>Role of Respondent</b>	<i>(BSC Party)</i>

<b>Respondent:</b>	
<b>Representing (please list all Parties)</b>	
<b>Question</b>	<b>Response</b>
1. Do you believe that P99 would better facilitate Applicable BSC Objectives (c) and (d)?  If No, please give reasons for your response.	<b>Yes</b>
2. Would your organisation be interested in using the Data Transfer Network (DTN) for PARMS data submission, rather than using the current email method?	<b>No</b> We do not believe the benefits will justify the cost of development. However we recognise that some participants will prefer to use DTN flows so suggest this is developed as an option for those who want to use it.
3. Do you agree with the proposed implementation strategy in relation to the PARMS improvements, with pre- and post-implementation workshops held by BSCCo (with timescales subject to participant lead times)?	<b>Yes</b>
4. Do you believe that there are any alternative solutions that the Modification Group should consider?	<b>No</b>
5. Does P99 raise any issues that you believe have not been identified so far and that should be progressed as part of this Assessment Procedure?	<b>No</b>
6. Do you have any further comments on P99 that you wish to make?	

P99\_ASS\_003 – Aquila Networks

<b>Respondent:</b>	Joanne Coveney
<b>Responding on Behalf of</b>	Metering Services – NHHMO, HHMO, NHHDC, NHHDA, HHDC, HHDA agents
<b>Role of Respondent</b>	Representative of the above

<b>Respondent:</b>	
<b>Representing (please list all Parties)</b>	
<b>Question</b>	<b>Response</b>
<p>1. Do you believe that P99 would better facilitate Applicable BSC Objectives (c) and (d)?</p> <p>If No, please give reasons for your response.</p>	<p><b>NO</b></p> <p>The main driver for Objective © would be cost against performance, If the best performers are expensive then they might reduce their costs by lowering performance.</p> <p>Objective (d) will be dependant on comments from us and other parties and what is taken from those and added to the requirements. A further review of this document once the details have been collated would be useful. The current requirements specified are an improvement to the PARMS reporting that is currently being used and should give a clearer outline of all parties performances but more detail is required.</p>
<p>2. Would your organisation be interested in using the Data Transfer Network (DTN) for PARMS data submission, rather than using the current email method?</p>	<p><b>NO</b></p> <p>This would be too expensive when the existing method of spreadsheets and email are already in place.</p>
<p>3. Do you agree with the proposed implementation strategy in relation to the PARMS improvements, with pre- and post-implementation workshops held by BSCCo (with timescales subject to participant lead times)?</p>	<p><b>YES</b></p> <p>It would be good to ensure all parties understand PARMS and it would be interesting to see the initial results and how they are interpreted. A cooling off period is a must. We would also want to ensure that Suppliers and their agents attended the workshops not just Suppliers or agents.</p>

4. Do you believe that there are any alternative solutions that the Modification Group should consider?	Unable to comment on until the final document is reviewed.
5. Does P99 raise any issues that you believe have not been identified so far and that should be progressed as part of this Assessment Procedure?	Only those mentioned on the DLIA form
6. Do you have any further comments on P99 that you wish to make?	We are not happy that several reports indicate that although they would be measuring us, the source of the data would be obtained from another party. We would want to continue submitting the reports that would be used to measure us. However the same report could be produced by another party if required for a comparison exercise.

## P99\_ASS\_004 – 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 Assessment Consultation on Modification Proposal P99 contained in your note of 17th October, our comments and answers to the six questions listed in the document are as follows:-

Q1. Do you believe that P99 would better facilitate Applicable BSC Objectives (c) and (d)? If No, please give reasons for your response.

A We agree with the proposed changes to PARMS and Entry Testing, however it is not entirely clear how onerous the process may be for re-certification. The proposals suggest that even low risk changes need to be notified to BSC Co Technical Assurance but this may trigger a TA scheduled visit which would increase the work for the participant but not necessarily provide any greater level of assurance than we have at present.

Q2. Would your organisation be interested in using the Data Transfer Network (DTN) for PARMS data submission, rather than using the current email method?

A No. Rationale: The existing St Clements Service process is working and the use of the DTN would incur additional, unnecessary, cost.

Q3. Do you agree with the proposed implementation strategy in relation to the PARMS improvements, with pre- and post-implementation workshops held by BSCCo (with timescales subject to participant lead times)?

A Yes.

Q4. Do you believe that there are any alternative solutions that the Modification Group should consider?

A Yes. Rationale:

Accreditation: The Market has been operating for five years and has had time to mature and 'bed down'. Part of the initial Accreditation process is to ensure that participants have robust change processes, and participants are frequently monitored through Technical Assurance checks. All this would seem to make the concept of continuing the re-certification process overly bureaucratic and costly.

Currently, the onus is on the participant to ensure that it operates according to the prescribed standards - which is as it should be. Requiring participants to notify BSCCo Technical Assurance of every change, regardless of the level of risk, is a step backwards, it introduces an element of 'nannying' and may increase cost.

The commercial interests of Market Participants provide a strong motivation to maintain compliance with BSC requirements, as failure to comply may put them out of business. Since 1998 what instances have there been of a participant making changes to either their systems or processes which have had a significant detrimental effect on Settlements?

Giving PAB the option of asking participants to re-certify may build in unnecessary delay to a the De-accreditation process. If PAB requests a participant to recertify and that participant fails to achieve re-certification PAB can still invoke the De-accreditation process but it will be at a later stage.

The proposals are trying to reduce the amount of work but the fundamental question of why the work needs to be done at all hasn't been addressed.

Q5. Does P99 raise any issues that you believe have not been identified so far and that should be progressed as part of this Assessment Procedure?

A Yes/No

Accreditation: see answer to '4' above.

PARMS Serials and Standards: No.

Entry Testing: No.

Q6. Do you have any further comments on P99 that you wish to make?

A It would have been more appropriate for a Modification to be created for each technique of Performance Assurance. The changes to each technique could be approved separately but with one Modification all the changes have to be approved before any can be implemented.

Regards

Garth Graham  
Scottish & Southern Energy plc



P99\_ASS\_005 – NGC

<b>Respondent:</b>	Clare Talbot
<b>Responding on Behalf of</b>	National Grid
<b>Role of Respondent</b>	Transmission Company

<b>Respondent:</b>	Clare Talbot
<b>Representing (please list all Parties)</b>	National Grid
<b>Question</b>	<b>Response</b>
<p>1. Do you believe that P99 would better facilitate Applicable BSC Objectives (c) and (d)?</p> <p>If No, please give reasons for your response.</p>	<p><b>Yes</b></p> <p>Rationale: The proposal is aimed at improving the efficiency of current administrative arrangements, aligning with applicable objective d) whilst retaining the rigour of the assurance/accreditation process.</p>
<p>2. Would your organisation be interested in using the Data Transfer Network (DTN) for PARMS data submission, rather than using the current email method?</p>	<p><b>N/A</b></p> <p>Rationale:</p>
<p>3. Do you agree with the proposed implementation strategy in relation to the PARMS improvements, with pre- and post-implementation workshops held by BSCCo (with timescales subject to participant lead times)?</p>	<p><b>Yes</b></p> <p>Rationale: A phased approach with the opportunity to address any outstanding issues in a shared, workshop environment sounds useful.</p>
<p>4. Do you believe that there are any alternative solutions that the Modification Group should consider?</p>	<p><b>No</b></p> <p>Rationale:</p>
<p>5. Does P99 raise any issues that you believe have not been identified so far and that should be progressed as part of this Assessment Procedure?</p>	<p><b>No</b></p> <p>Rationale:</p>
<p>6. Do you have any further comments on P99 that you wish to make?</p>	

P99\_ASS\_006 – Scottish Power

<b>Respondent:</b>	Man Kwong Liu
<b>Responding on Behalf of</b>	<i>Please list all Parties responding on behalf of (including the respondent company if relevant).</i> Scottish Power UK Plc.; ScottishPower Energy Trading Ltd.; Scottish Power Generation Ltd.; ScottishPower Energy Retail Ltd.; SP Dataserve Ltd.
<b>Role of Respondent</b>	<i>(BSC Party/Other – please state)</i> BSC Parties and Agents

<b>Respondent:</b>	
<b>Representing (please list all Parties)</b>	
<b>Question</b>	<b>Response</b>
1. Do you believe that P99 would better facilitate Applicable BSC Objectives (c) and (d)?  If No, please give reasons for your response.	Yes Rationale: The new serials are an improvement on what is currently in place. However, due to a number of issues, including our concerns over the cost of implementation and lack of information it is only a conditional YES.
2. Would your organisation be interested in using the Data Transfer Network (DTN) for PARMS data submission, rather than using the current email method?	No Rationale: It is too costly and we have no problems with the email method as it stands. The changes, new data flows, would also have to go through the MRASCo Change Processes and be considered by the MRA Development Board. In addition MDD may need to change to include a PARMS Role Code - more cost to the market.
3. Do you agree with the proposed implementation strategy in relation to the PARMS improvements, with pre- and post-implementation workshops held by BSCCo (with timescales subject to participant lead times)?	Yes Rationale: Yes, but we feel that more training and guidance should be provided as well.
4. Do you believe that there are any alternative solutions that the Modification Group should consider?	No Rationale:
5. Does P99 raise any issues that you believe have not been identified so far and that should be progressed as part of this Assessment Procedure?	Yes Rationale: See detailed comments attached (on PARMS).

<p>6. Do you have any further comments on P99 that you wish to make?</p>	<p>See detailed comments attached (on PARMS).</p> <p>Also, on section 2.1.4 Additional Certification. We have a slight concern that changing from NHHDC to HHDC or vice versa should require only additional certification. The roles are very different, with different systems, different type and skills of staff, etc. We would have thought full certification would have been more appropriate. The same comment applies, to a lesser extent perhaps, to changing between the NHHDA and HHDA roles.</p>

**P99: Response to Question 6 and Question 5**

We have an overall concern about lack of detail and indeed instance of errors within Appendix B - Proposed PARMS Serials and Standards. The document should be reissued to correct some of the mistakes contained therein. In addition to this, there needs to be consultation on a plain English MIRT document to clarify some of the intention behind these serials and outline how such Serials can be measured. Some specific points on appendix B are outlined below. Some of these have been raised in our SVG response, others are new:

**CM01**

As there is a new BSCP being drafted in this area, we suggest it would be more sensible to wait to produce the requirements for CM01 after the BSCP has been finalised.

**CM02**

The current reporting mechanism for faults (IO10) is not robust. ISG change proposal CP511 recommends the creation of a new flow CDCA to MOA parties. This flow will summarise and notify potential faults, and also include a warning if data collected from the primary and secondary outstations disagree.

The introduction of such a flow has been supported by Elexon, as it is a requirement of BSCP03, which is currently not met.

We believe it would be sensible to delay definition of the specific requirements for CM02 until CP511 is implemented. We understand implementation may be December 2002.

**DA02**

Our major concern with this Serial is that it is shifting ownership to the HHDA to find the applicable LLFs from the website when the SMRS has not sent the value. This should not be the case and if the responsibility was to shift in this way then the costs of HHDA's will significantly rise and the costs of distributors will fall without any compensatory reduction in DUOS charges. We therefore believe that this Serial should be removed.

**HC01**

We consider the target of 100% for this Serial to be unrealistic. It is recognised in the industry that there will always be exceptions resulting in a read not being achieved, this should be reflected in the standard.

We have even greater concerns about how the information to report on this Serial could be obtained. The report is on RF and cannot be produced by the HHDC, as the settlements process is an HHDA concept. The D0022 flow does not contain the information required and cannot be sent to the HHDA. Even if the flow was modified, major changes to HHDA would be required in order to handle D0022 flows and produce this report; this would involve substantial costs.

**HM02**

This incorrectly states the source of the Serial as the NHHDC

**HM05**

On the basis that, where possible, the rest of the reports are being sourced by parties other than the ones who have to meet the standard; this report is inconsistent. The standard is on the old HHMO and the obligation to source the data is on the old HHMO.

**NC01**

Suppliers do not receive D0023s, so the start and end events do not make sense. Is this to be sourced from the NHHDA or supplier? Why is there a choice?

**NC03**

How will the source of the Serial i.e. the NHHDA, know that the date that the NHHDC received the D0148?

***NM01/HM01***

Our systems do not have the capability to identify which particular D0002 was sent finally *resolving* an issue from a particular D0001. We do not believe that even substantial changes to our systems would allow us to do this. It is likely that changes to the structure or method of populating the D0001 and/or D0002 would be required before this would be possible.

We have already received a response from Elexon that suggests a CR could be raised with MRASCo to change the D0002 to amend the way it is populated. This is not referred to in Appendix B.

**NM03**

On the basis that, where possible, the rest of the reports are being sourced by parties other than the ones who have to meet the standard; this report is inconsistent. The standard is on the NHHMO and the obligation to source the data is on the NHHMO.

***NM04/HM05***

We do not agree that in all instances the old MO has an obligation to pass the METDs to the new MO. Particularly in the Half Hourly environment, such information exchange only happens when the MO's share a valid commercial contract. It is therefore not appropriate to have a Serial in this area. The 'immediate transfer of data' in the PSL relates to site technical details (D0215) and not to meter technical details.

**SH01**

There is a lack of detail on what is expected in this report. How should 'analysed and acted upon by supplier' be interpreted?

**SH02**

The HHDA cannot create default values, only the HHDC does; CP 696 was raised to allow HHDA default values, but it was rejected. We therefore believe that HHDA's cannot be asked to report on the use of default EAC values and as such this Serial should be removed.

**SH03**

We are unclear as to the end point of this serial. How should 'analysed and acted upon' be interpreted?

**SH04**

For consistency, why is the source HHMO and not HHDC?

**SP04**

We require further guidance as to how the end point of this serial should be measured. Guidance is also needed on what happens to the D0010 count if a Change of Supply occurs in the middle.

***SP08/SH02***

We would like clarification that when 'MSID' is referred to in the title of these Serials, 'MPAN' should in fact be used. We are aware that in the vast majority of areas one MSID has one MPAN. However, in some distribution areas e.g. Manweb area, there are instances of multiple MSIDs (meters) per MPAN. All other reporting is at an MPAN level, so we believe the naming of these Serials is just a terminology issue but should be amended to avoid confusion. We would not be able to provide the data under these Serials on an MSID basis.

We have already received a response from Elexon after our previous SVG comments, which accepted this point and said that the references to MSID would be changed to MPAN. This has not been reflected in Appendix B.

P99\_ASS\_007 – Npower

<b>Respondent:</b>	Richard Harrison, Npower Limited
<b>Responding on Behalf of</b>	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 Limited
<b>Role of Respondent</b>	Supplier/Generator/Data Collector/Data Aggregator/ Meter Operator Agent

<b>Respondent:</b>	
<b>Representing (please list all Parties)</b>	
<b>Question</b>	<b>Response</b>
<p>1. Do you believe that P99 would better facilitate Applicable BSC Objectives (c) and (d)?</p> <p>If No, please give reasons for your response.</p>	<p><b>No – given the current status of related documentation</b></p> <p>Rationale: In principle we agree, but as a Supplier and Party Agent we would wish to see additional details and clarification in the requirements specification in order to assess the full implications. There is a risk that the proposal will create the biggest commercial risks for small suppliers and others reliant on 3<sup>rd</sup> party Agents.</p>
<p>2. Would your organisation be interested in using the Data Transfer Network (DTN) for PARMS data submission, rather than using the current email method?</p>	<p><b>No</b></p> <p>Rationale: There is very limited information at this stage regarding this proposal to use the DTN to communicate PARMS. We cannot see how a DTN flow can be organised to accept what is now sent by e-mail.</p> <p>Would we have to have a different DTN flow for each serial? If so, this would be cumbersome. This would also carry a cost implication, which we feel is unnecessary.</p>
<p>3. Do you agree with the proposed implementation strategy in relation to the PARMS improvements, with pre- and post-implementation workshops held by BSCCo (with timescales subject to participant lead times)?</p>	<p><b>Qualified YES</b></p> <p>Rationale: We feel that workshops are needed to help understand the detail of what is being proposed, with all relevant parties present. A series of workshops would need to be held to enable all parties to be able to express their concerns. We would suggest the workshops are grouped i.e. a workshop for Suppliers, one for MOA, etc.</p> <p>However, in relation to the overall strategy and commercial issues, we feel it is highly desirable to resolve as many as possible of the issues before committing to</p>

	implementation.
4. Do you believe that there are any alternative solutions that the Modification Group should consider?	<p><b>Yes</b></p> <p>Rationale: Given the potential complexity of implementation in a variety of different systems across the industry, a fundamental question is whether all the PARMS measures should be prescriptive and rigorously applied or potentially measured in slightly different ways by different participants (taking account of differences in systems, working practices and communication methods). The latter would really require affected measures to be treated as 'indicative' in the Performance Assurance process, which has implications for the Framework as a whole.</p>
5. Does P99 raise any issues that you believe have not been identified so far and that should be progressed as part of this Assessment Procedure?	<p><b>Yes</b></p> <p>1) There may be significant contractual issues between Suppliers and their Agents relating to liability for any inaccuracies in PARMS information submitted to Elexon by Agents directly.</p> <p>2) We believe that the impact of non-compliance's by previous Suppliers and/or their Agents on performance should be considered.</p>
6. Do you have any further comments on P99 that you wish to make?	<p>We wish to reiterate our previously submitted comments in response to the consultation paper dated 20/05/02 against the proposed serial which does not appear to have been taken account of:-</p> <p><u>SP04</u>: The final sentence under 'Reason' should read "The Supplier has 3 months to install the HH meter from the point at which it becomes aware the definition of '100kW premises' has been fulfilled.</p>

**P99\_ASS\_008 – British Energy**

<b>Respondent:</b>	<i>Rachel Ace</i>
<b>Responding on Behalf of</b>	<i>British Energy Power &amp; Energy Trading Ltd, British Energy Generation Ltd, Eggborough Power Ltd</i>
<b>Role of Respondent</b>	<i>Relevant roles: Generator / Supplier / CVA MOA</i>

<b>Respondent:</b>	See above.
<b>Representing (please list all Parties)</b>	See above.
<b>Question</b>	<b>Response</b>
<p>1. Do you believe that P99 would better facilitate Applicable BSC Objectives (c) and (d)?</p> <p>If No, please give reasons for your response.</p>	<p><b>Yes/No</b></p> <p>The improvements appear to have potential to improve the accurate and timely determination of parties metered volumes. It is not possible to say whether this will better meet BSC Objectives until the costs and benefits of the extensive changes have been assessed.</p>
<p>2. Would your organisation be interested in using the Data Transfer Network (DTN) for PARMS data submission, rather than using the current email method?</p>	<p><b>No</b></p> <p>The current method is simple and inexpensive for BE. Internal system changes to use the DTN would be unlikely to be cost-beneficial.</p>
<p>3. Do you agree with the proposed implementation strategy in relation to the PARMS improvements, with pre- and post-implementation workshops held by BSCCo (with timescales subject to participant lead times)?</p>	<p><b>Yes/No</b></p> <p>Rationale: No comment at this stage.</p>
<p>4. Do you believe that there are any alternative solutions that the Modification Group should consider?</p>	<p><b>Yes/No</b></p> <p>Rationale: No comment at this stage.</p>
<p>5. Does P99 raise any issues that you believe have not been identified so far and that should be progressed as part of this Assessment Procedure?</p>	<p><b>Yes/No</b></p> <p>Rationale: No comment at this stage.</p>
<p>6. Do you have any further comments on P99 that you wish to make?</p>	<p>The costs of these improvements could be considerable, and are chiefly concerned with the supplier side of the market. Consideration should be given to the costs being allocated to that side of the market.</p>



**P99\_ASS\_009 – LE Group**

<b>Respondent:</b>	Name LE Group
<b>Responding on Behalf of</b>	Please list all Parties responding on behalf of (including the respondent company if relevant). London Electricity Group Plc, London Electricity Plc, Jade Power Generation Ltd, Sutton Bridge Power Ltd, West Burton Power, London Power Network Plc, Eastern Power Network Distribution Ltd and ECS.
<b>Role of Respondent</b>	(BSC Party/Other – please state) Supplier, PDSO, NHH DC, NHH DA, NHH MOA, HH MOA and CVA MOA

<b>Respondent:</b>	
<b>Representing (please list all Parties)</b>	
<b>Question</b>	<b>Response</b>
1. Do you believe that P99 would better facilitate Applicable BSC Objectives (c) and (d)?  If No, please give reasons for your response.	<b>Yes</b> Rationale:
2. Would your organisation be interested in using the Data Transfer Network (DTN) for PARMS data submission, rather than using the current email method?	<b>No presently</b> Rationale: We see no need to change from the existing mechanism at the moment. Although, we would be interested in what the costs might be for DTN flows and implementation of this system, with a view to possible use in the future.
3. Do you agree with the proposed implementation strategy in relation to the PARMS improvements, with pre- and post-implementation workshops held by BSCCo (with timescales subject to participant lead times)?	<b>Yes</b> Rationale: We believe that pre- and post-implementation workshops will be invaluable in ensuring that the new and revised PARMS reporting is a success for all involved.
4. Do you believe that there are any alternative solutions that the Modification Group should consider?	<b>No</b> Rationale:
5. Does P99 raise any issues that you believe have not been identified so far and that should be progressed as part of this Assessment Procedure?	<b>No</b> Rationale:
6. Do you have any further comments on P99 that you wish to make?	

P99\_ASS\_010 –

<b>Respondent:</b>	<i>Name</i>
<b>Responding on Behalf of</b>	<i>Please list all Parties responding on behalf of (including the respondent company if relevant).</i>
<b>Role of Respondent</b>	<i>(BSC Party/Other – please state)</i>

<b>Respondent:</b>	
<b>Representing (please list all Parties)</b>	
<b>Question</b>	<b>Response</b>
<p>1. Do you believe that P99 would better facilitate Applicable BSC Objectives (c) and (d)?</p> <p>If No, please give reasons for your response.</p>	<p><b>Yes/No</b></p> <p>Rationale:</p>
<p>2. Would your organisation be interested in using the Data Transfer Network (DTN) for PARMs data submission, rather than using the current email method?</p>	<p><b>Yes/No</b></p> <p>Rationale: We agree in principle with the use of the DTN, as this would benefit the PARM process for the Industry as a whole. We do not feel that there are benefits to individual participants however. We would have expected that if this were to be introduced it would be incorporated into the DTC, so as to completely standardise the process. However we understand that the intention is to make an optional service available through Electralink, which will be chargeable to those who wish to participate. This would mean that should we wish to participate we would be subject to implementation and running costs for little or no gain to the processes at IMServ.</p>
<p>3. Do you agree with the proposed implementation strategy in relation to the PARMs improvements, with pre- and post-implementation workshops held by BSCCo (with timescales subject to participant lead times)?</p>	<p><b>Yes/No</b></p> <p>Rationale: We require 6 months minimum lead time for the changes</p>
<p>4. Do you believe that there are any alternative solutions that the Modification Group should consider?</p>	<p><b>Yes/No</b></p> <p>Rationale:</p>
<p>5. Does P99 raise any issues that you believe have not been identified so far and that should be progressed as part of this</p>	<p><b>Yes/No</b></p> <p>Rationale: SP03 – there appears to be no start or end</p>

<p>Assessment Procedure?</p>	<p>points for the measure in this PARM?</p> <p>SP06 – There is no timescale stated for the Suppliers to send the D0148 on receipt of a D0011. If there are no timescales then the PARM measure will never achieve 100%?</p> <p>HC01 – This PARM needs to state that exceptions need to be allowed for, e.g. D0268 received, appointed?</p> <p>HM02 – How can the source (NHHDC) measure when a valid D0010 is received by an HHDC? The ‘Start’ does not state where the measure should be taken from, should this be D0268?</p> <p>HM06 – Does this measure relate to the validation of the format of the flows only, or whether the actual data provided is correct (which requires proving to confirm)?</p> <p>SH01 – There appears to be an inconsistency between the source is (HHDA) and the ‘Start’ (refers to NHHDA).</p> <p>HM01 – We agree with this measure although some HHMOp are currently sending D0002 as updates rather than D0005 flows which could affect the accuracy of this measure.</p>
<p>6. Do you have any further comments on P99 that you wish to make?</p>	<p>No</p>

P99\_ASS\_011 – SEEBOARD

<b>Respondent:</b>	Dave Morton
<b>Responding on Behalf of</b>	SEEBOARD Energy Limited
<b>Role of Respondent</b>	BSC Party (Supplier)

<b>Respondent:</b>	
<b>Representing (please list all Parties)</b>	
<b>Question</b>	<b>Response</b>
1. Do you believe that P99 would better facilitate Applicable BSC Objectives (c) and (d)?  If No, please give reasons for your response.	<b>Yes for objective (d).</b> Rationale: It is possible that objective (c) could be better facilitated but there are other factors that will determine if this occurs.
2. Would your organisation be interested in using the Data Transfer Network (DTN) for PARMS data submission, rather than using the current email method?	<b>No</b> Rationale: There only seems to be three serials, see response to Q6, that a Supplier needs to provide. It is unlikely that using DTN will be cost effective for this amount of data.
3. Do you agree with the proposed implementation strategy in relation to the PARMS improvements, with pre- and post-implementation workshops held by BSCCo (with timescales subject to participant lead times)?	<b>Yes</b> Rationale:
4. Do you believe that there are any alternative solutions that the Modification Group should consider?	<b>No</b> Rationale:
5. Does P99 raise any issues that you believe have not been identified so far and that should be progressed as part of this Assessment Procedure?	<b>No</b> Rationale:
6. Do you have any further comments on P99 that you wish to make?	Section 2.3.3 states Agent performance would be at national level and not GSP level. It might be useful to provide a full picture if such reporting was also made at GSP level.  Section 7.2 does not include PSL130 but changes to this document are likely if this modification is progressed.  Serial NC01 indicates Supplier as a possible

	<p>source. Within current baseline this is not possible, as a Supplier would never be in receipt of information that forms basis of this serial. We feel that Supplier should be removed as a possible source for this serial.</p> <p>Serial NC02 notes that history should sent within 8 WDs and on a CoS start point is receipt of D0151. Should start point on CoS not be SSD as this then ties into obligation within BSCP to send history by SSD+8? If not there would seem to be possibility of many failures recorded when obligations are still being met.</p> <p>Serial SP04, qualification guideline might need to be better specified. For example, if data is all estimated should this be used in this serial or not. We need to ensure everyone is clear about this data.</p> <p>Our reading of this report is that a Supplier is responsible for ensuring Agents provided data to Elexon directly rather than collecting that data and forwarding it to Elexon. It is assumed that if any problems arise with this data a Supplier would still not send this data but would discuss problems with Agent and determine what assistance they required to be able to provide that information. Confirmation of this would be useful for planning purposes.</p>
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