

P228 Report Phase Consultation Responses

Consultation Issued on 13 November 2008

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	E.ON UK	P228_dMR_01	7	0
2.	SAIC Ltd. (for and on behalf of ScottishPower)	P228_dMR_02	8	0
3.	Centrica	P228_dMR_03	10	0

Question 1: Do you agree with the Panel's view that P228 should be approved?

Summary

Yes	No	Neutral/Other
3	0	0

Responses

Respondent	Response	Rationale
E.ON UK	Yes	Removing references to amounts which may be revised would be helpful to prevent the Code falling out of date.
SAIC Ltd. (for and on behalf of ScottishPower)	Yes	It seems sensible to remove configurable and changeable values, such as these charges from the Code itself, making it a more efficient process to amend these as and when required. This is consistent with other BSC parameters.
Centrica	Yes	Having the charges appear clearly and transparently on the BSC website would benefit the administration of the arrangements by providing more up to date information than exists in the BSC currently. This would be likely to reduce Elexon resource being allocated to handle queries and potential party misinterpretation. This would provide a benefit under BSC Objective (d). The Modification Report also highlights that there could be benefits for new entrants from reduced potential for misinterpretation. This would therefore also have a small benefit under competition (Objective (c)).

Question 2: Do you agree with the Panel's suggested Implementation Date?

Summary

Yes	No	Neutral/Other
3	0	0

Responses

Respondent	Response	Rationale
E.ON UK	Yes	If old and new schedules were published together on the website Implementation could be undertaken sooner and help highlight the fact that these charges are changing 01/04/09, but changing the Code from that date would probably be simplest and most efficient.
SAIC Ltd. (for and on behalf of ScottishPower)	Yes	Implementation in line with the Isis implementation is sensible.
Centrica	Yes	-

Question 3: Do you agree that the legal text delivers the intention of P228?

Summary

Yes	No	Neutral/Other
3	0	0

Responses

Respondent	Response	Rationale
E.ON UK	Yes	The legal text appears appropriate to rectify the defect identified.
SAIC Ltd. (for and on behalf of ScottishPower)	Yes	-
Centrica	Yes	-

Question 4: Do you have any further comments on P228?

Summary

Yes	No	Neutral/Other
0	3	0

Responses

Respondent	Response	Rationale
E.ON UK	No	
SAIC Ltd. (for and on behalf of ScottishPower)	No	-
Centrica	No	-