

## Attachment C - P233 Report Phase Consultation Responses

Consultation Issued on 13 March 2009

Representations were received from the following parties

| No | Company  | File number | No BSC Parties Represented | No Non-Parties Represented |
|----|--|-------------|----------------------------|----------------------------|
| 1. | E.ON UK  | P233_dMR_01 | 7                          | 0                          |
| 2. | Scottish and Southern Energy                   | P233_dMR_02 | 7                          | 0                          |
| 3. | British Energy part of EDF Energy              | P233_dMR_03 | 13                         | 0                          |
| 4. | SAIC Ltd. (for and on behalf of ScottishPower) | P233_dMR_04 | 7                          | 0                          |

**Question 1: Do you agree with the Panel's view that P233 should be approved?**

Please state the reason(s) for your view

### Summary

| Yes | No | Neutral/Other |
|-----|----|---------------|
| 4   | 0  | 0             |

### Responses

| Respondent                        | Response | Rationale   |
|-----------------------------------|----------|---|
| E.ON UK                           | Yes      | As the Panel recognise, correcting these inconsistencies and updating to acknowledge the use of UCP600 or ISP98 Letters of Credit supports Applicable BSC objective d.                                      |
| Scottish and Southern Energy      | Yes      | Self evident housekeeping. More efficient; therefore the Modification Proposal P233 will promote transparency and efficiency and thereby better facilitates the achievement of Applicable BSC Objective (d) |
| British Energy part of EDF Energy | Yes      | Straightforward housekeeping clarifications, amendments and corrections.  |

| Respondent  | Response | Rationale  |
|---|----------|--|
| <b>SAIC Ltd. (for and on behalf of ScottishPower)</b> | Yes      | ScottishPower agrees with reducing the potential for confusion by addressing the issues in the Modification Proposal (P233), which will promote transparency and efficiency and thereby better facilitate the achievement of the Applicable BSC Objective. |

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

### Summary

| Yes | No | Neutral/Other |
|-----|----|---------------|
| 4   | 0  | 0             |

### Responses

| Respondent  | Response | Rationale  |
|---|----------|--|
| <b>E.ON UK</b>  | Yes      | -  |
| <b>Scottish and Southern Energy</b>                   | Yes      | Sensible and pragmatic   |
| <b>British Energy part of EDF Energy</b>              | Yes      | Practical to implement co-incident with P215.  |
| <b>SAIC Ltd. (for and on behalf of ScottishPower)</b> | Yes      | ScottishPower agrees with the proposed Implementation Date of 25 June 2009 if an Authority decision is received on or before 23 June 2009, or 2 Working Days after an Authority decision if the decision is received after 23 June 2009; |

## Question 3: Do you agree that the legal text delivers the intention of P233?

### Summary

| Yes | No | Neutral/Other |
|-----|----|---------------|
| 4   | 0  | 0             |

### Responses

| Respondent     | Response | Rationale               |
|----------------|----------|-------------------------|
| <b>E.ON UK</b> | Yes      | It appears appropriate. |

| Respondent                                     | Response | Rationale  |
|--|----------|--|
| Scottish and Southern Energy                   | Yes      | It appears to.   |
| British Energy part of EDF Energy              | Yes      | Note: At Section X the proposed definition “ <b>Specimen Settlement Day</b> : In relation to any Settlement Day, a Settlement Day having the same attributes as that Settlement Day other than a Clock Change.” is in isolation not absolutely unambiguous. Could mean the attributes must be the same but Clock Change need not be, or that they must be the same except the Specimen day must not have the Clock Change attribute.<br><br>Should P215 M1.2.1(f)(ii)&(iv) both refer to data received <b>from</b> CDCA, rather than (iv) referring to data received <b>by</b> CDCA? |
| SAIC Ltd. (for and on behalf of ScottishPower) | Yes      | -  |

#### Question 4: Do you have any further comments on P233?

##### Responses

| Respondent                                     | Response | Rationale |
|--|----------|-----------|
| E.ON UK  | No       | -         |
| Scottish and Southern Energy                   | No       |           |
| British Energy part of EDF Energy              | No       | -         |
| SAIC Ltd. (for and on behalf of ScottishPower) | No       | -         |