

## P241 Consultation Responses

Consultation issued on 17 November 2009

We received responses from the following Parties

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
SAIC Ltd. (for and on behalf of ScottishPower)	7/0	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
Centrica	10/0	Supplier/Generator/Trader
RWE Supply & Trading GmbH	10/0	Supplier/Generator/Trader / Consolidator / Exemptable Generator / Party Agent
International Power	6/0	Generator/Trader

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Question 1: Do you agree with the Panel's view that Proposed Modification P241 better facilitates the achievement of Applicable BSC Objectives (c) and (d) compared with the existing BSC requirements and should be approved?

### Summary

Yes	No	Neutral/Other
4	0	

### Responses

Respondent	Response	Rationale
SAIC Ltd	Yes	We agree with the Panel's views against the applicable Objectives:  Objective c) - the installation of additional non-settlement metering at considerable cost would put that class of Generator at a competitive disadvantage over other classes.  Objective d) - similarly, the administration of these additional (and unnecessary) meters and their data adds to the operating costs of the BSC and their Agents.
Centrica	Yes	Centrica supports the view of the Panel members who believe that P241 would better facilitate Applicable BSC Objectives (c) and (d) for the reasons provided in the report.
RWE Supply & Trading GmbH	Yes	We agree with the Panel that that implementation of P241 would better facilitate Applicable BSC Objectives (c) and (d).
International Power	Yes	In aligning the BSC with existing practise at CCGTs and thereby removing the requirement for CCGTs to fit and maintain unnecessary metering with all the attendant costs, this proposal will remove an obstacle to market participation (thereby facilitating Objective (c)). Objective (d) will be furthered because the proposal will remove the need to unnecessarily read meters and administer the resulting data.

Question 2: Do you agree with the Panel's recommended Implementation Date of 5 Working Days after an Authority decision?

### Summary

Yes	No	Neutral/Other
4		

### Responses

Respondent	Response	Rationale
SAIC Ltd	Yes	The change will in effect align the BSC to the current practice for CCGTs – as it is a legal change to the Code, and should have no associated central or Party system changes, it should be implemented as soon as practically possible.
Centrica	Yes	-
RWE Supply & Trading GmbH	Yes	The proposed implementation date appears reasonable.
International Power	Yes	-

Question 3: Do you agree that the Panel's recommended legal text delivers the P241 solution agreed by the Modification Group?

### Summary

Yes	No	Neutral/Other
4		

### Responses

Respondent	Response	Rationale
SAIC Ltd	Yes	The legal text delivers the proposed solution.
Centrica	Yes	-
RWE Supply & Trading GmbH	Yes	The proposed legal text delivers the P241 solution.
International Power	Yes	-

Question 4: Do you have any further comments on P241?

### Responses

Respondent	Response	Rationale
SAIC Ltd	No	-
Centrica	No	
RWE Supply & Trading GmbH	No	
International Power	No	-