

## P244 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
National Grid	1/0	Transmission Company
Drax Power Limited	1/0	Generator
SAIC Ltd. (for and on behalf of ScottishPower)	7/0	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
Scottish and Southern Energy	9/0	Supplier / Generator
RWE Supply & Trading GmbH	10/0	Supplier/Generator/ Trader / Consolidator / Exemptible Generator / Party Agent
Centrica	10/0	Supplier/Generator/ Trader
EDF Energy	13/0	Supplier/Generator/Trader/Consolidator/Exemptible Generator/Party Agent/Distributors

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 initial majority view that the Proposed Modification should be rejected?

### Summary

Yes	No	Neutral/Other
7	0	0

### Responses

Respondent	Response	Rationale
National Grid	Yes	See response to Q2
Drax Power Ltd	Yes	Drax agrees with the Panel's view that the Alternative Modification better facilitates the BSC Objectives.

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Respondent	Response	Rationale
SAIC Ltd.	Yes	The Alternative Modification provides a better solution.
Scottish and Southern Energy	Yes	Whilst we believe that P244 Original will better meet the Applicable BSC Objectives; when compared with the baseline; the Alternative, by virtue of being 'future-proof' to allow for future interconnectors, is even better.
RWE Supply & Trading GmbH	Yes	We believe that the proposed modification would better facilitate competition (Objective C) when compared to the current baseline, but is not better than the alternative modification proposal.
Centrica	Yes	Centrica agrees that whilst the Proposed Modification better facilitates the BSC objectives compared to the baseline, the Alternative modification is preferable.
EDF Energy	Yes	Although it meets BSC objectives better than the BSC baseline, it does not meet the BSC objectives as well as the alternative.

Question 2: Do you agree with the Panel's initial majority view that the Alternative Modification better facilitates the achievement of Applicable BSC Objectives (b), (c) and (d) when compared to the current arrangements and the Proposed Modification, and should be approved?

### Summary

Yes	No	Neutral/Other
7	0	0

### Responses

Respondent	Response	Rationale
National Grid	Yes	<p>Increase in information transparency and availability of improved market information to all participants should promote effective competition in the generation and supply of electricity (Applicable BSC Objective (c)).</p> <p>Provision of more consistent and transparent information should improve self-balancing and allow market participants to manage electricity related costs and risks; this should, in turn, improve the efficient, economic and co-ordinated operation of the GB transmission system (Applicable BSC Objective (b)).</p> <p>The Alternative Modification will save some of the</p>

Respondent	Response	Rationale
		administrative costs of progressing a full modification proposal for future interconnectors, and will promote efficiency in the implementation and administration of the balancing and settlement arrangements (Applicable BSC Objective (d)).
Drax Power Ltd	Yes	<p>Drax agrees with the Panel that both proposals under P244 would help to promote the efficient operation of the transmission system (Objective B) and promote more effective competition (Objective C). This would be achieved by providing greater transparency of the operation and availability of the BritNed Interconnector to both market participants and the System Operator; this should assist such parties in taking the most appropriate actions in terms of both system balancing activity and actions taken within the wholesale electricity market.</p> <p>Further to this, Drax also agrees that the Alternative Modification promotes administrative efficiency (Objective D) in that further modifications will not be required in the event of future interconnector development. Drax agrees with the Panel's view that the Alternative Modification better facilitates the BSC Objectives.</p>
SAIC Ltd.	Yes	Arguably the Alternative Modification seeks make allowance in the Code for future Interconnector data to be incorporated into the BMRS without the need for a full Modification and thus achieves Objective (b).
Scottish and Southern Energy	Yes	<p>As indicated in our response to Question 1 above, the Alternative takes account of future interconnectors such as those already announced between Ireland and Wales and those being talked of, such as a second connection with France.</p> <p>Intrinsically this must be better than the Original as it avoids the need for future BSC Modification having to be raised.</p> <p>Thus in addition to better achieving Applicable Objectives (b) and (c) (in the same way as the Original) the Alternative better achieves Objective (d) which the Original does not.</p>
RWE Supply & Trading GmbH	-	We believe that the proposed alternative modification would better meet Objectives b, c and d when compared with both the base line and the proposed modification. We believe that improved information transparency on generation outages will improve competition and market liquidity and that the improved process for reporting new interconnectors is

Respondent	Response	Rationale
		more efficient.
Centrica	Yes	Centrica endorses the view of the Panel.
EDF Energy	Yes	-

Question 3: Do you agree with the Panel's suggested Implementation date of 05 November 2010 if an Authority decision is received on or before 28 January 2010, or 23 February 2011 if the Authority decision is received after 28 January 2010 but on or before 30 March 2010?

#### Summary

Yes	No	Neutral/Other
7	0	0

#### Responses

Respondent	Response	Rationale
National Grid	Yes	-
Drax Power Ltd	Yes	The suggested implementation dates appear reasonable
SAIC Ltd.	Yes	-
Scottish and Southern Energy	Yes	See answer to Question 4 below.
RWE Supply & Trading GmbH	Yes	The implementation dates appear reasonable.
Centrica	Yes	-
EDF Energy	Yes	Ideally, the information would be added as and when it becomes available, and the systems should be ready before or as the interconnector begins operating. But these dates are acceptable on the basis they minimise system impacts and cost, and should be in time to minimise any delay in reporting.

Question 4: Do you agree with the Panel's suggested approach to implement both Modifications P244 and P243 together as part of a standard BSC Systems release?

### Summary

Yes	No	Neutral/Other
7	0	0

### Responses

Respondent	Response	Rationale
National Grid	Yes	-
Drax Power Ltd	Yes	Should both modifications gain approval, it would appear more efficient (in terms of Page 2 of 3resource) to implement them together.
SAIC Ltd.	Yes	The changes required by P244 are closely related to those for P243 and as such it makes economic sense to implement both at the same time.
Scottish and Southern Energy	Yes	The cost of implementing P244 (Original or Alternative) warrants it being done in conjunction with other BSC changes, and in particular P243.
RWE Supply & Trading GmbH	Yes	The proposed implementation strategy is the most cost effective solution.
Centrica	Yes	Centrica supports the aim to reduce costs by combining implementation of these modifications but remains concerned at the level of cost required to make the information available.
EDF Energy	Yes	Reduce costs and co-ordination effort.

Question 5: Do you agree that the Panel's recommended legal text delivers the solution agreed by the Modification Group for P244?

### Summary

Yes	No	Neutral/Other
7	0	0

### Responses

Respondent	Response	Rationale
National Grid	Yes	-
Drax Power Ltd	Yes/No	-
SAIC Ltd.	Yes	-
Scottish and Southern Energy	Yes	It appears to.
RWE Supply & Trading GmbH	Yes	The proposed legal text delivers the solution.
Centrica	Yes	-
EDF Energy	Yes	-

### Question6: Do you have any further comments on P244?

#### Responses

Respondent	Response	Rationale
National Grid	No	-
Drax Power Ltd	No	-
SAIC Ltd.	No	-
Scottish and Southern Energy	No	Nothing further at this time.
RWE Supply & Trading GmbH	No	-
Centrica	No	
EDF Energy	Yes	We consider the cost high (£113k stand-alone) for what appears to be a relatively simple additional row of data to be reported. This makes justification against BSC Objective (d) difficult, but we think it would be misleading to report market data without this significant new power flow.