

## P244 Consultation Responses

Consultation issued on 2 October 2009

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

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 / Exemptible Generator / Party Agent
National Grid	1/0	Transmission Company
Scottish and Southern Energy	9/0	Supplier / Generator
Intergen (UK) Ltd.	3/1	Generator/Trader
EDF Energy	13/0	Supplier/Generator/Trader/Consolidator/Exemptible Generator/Party Agent/Distributors
E.ON UK	6/0	Supplier / Generator / Trader / Consolidator / Exemptible Generator

Question 1: Would the Proposed Modification P244 help to achieve the Applicable BSC Objectives?

### Summary

Yes	No	Neutral/Other
8	0	0

### Responses

Respondent	Response	Rationale
SAIC Ltd. (for	Yes	BSC Objectives B and C would be achieved.

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Respondent	Response	Rationale
and on behalf of ScottishPower)		Information for the BritNed Interconnector would ensure that all (current) Interconnectors were identified and their respective data displayed, giving a comprehensive market view for Parties and the System Operator.
Centrica	Yes	Centrica endorses the views of the modification Group.
RWE Supply & Trading GmbH	Yes	We endorse the views expressed by the P244 Modification Group.
National Grid	Yes	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)). 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)).
Scottish and Southern Energy	Yes	P244 Original would better achieve Applicable Objectives (b) and (c) when compared with the baseline for the reasons outlined in section 8 (pg 9) of the consultation document.
Intergen (UK) Ltd.	Yes	The proposal would achieve the BSC objective 'Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity' by delivering a greater level of transparency thereby aiding competition.
EDF Energy	Yes	Whatever the justification was for the existing published data on interconnector flows should apply equally to this proposal, provided there are multiple users of the relevant interconnector so that no issues of information discrimination arise.  <a href="#">The respondent has noted that there are arrangements in place where BritNed will auction any available capacity to a number of market participants.</a>
E.ON UK	Yes	As identified by the Proposer and supported by the Modification Report, BSC Objectives (b) and (c) would be supported by data disclosure for new Interconnector separately to those existing.

Question 2: Would the Alternative Modification P244 help to achieve the Applicable BSC Objectives compared to the current baseline?

Yes	No	Neutral/Other
8	0	0

### Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	Yes	BSC Objectives B and C would be achieved, as above. Arguably Objective D would also be achieved by reducing the cost of future changes.
Centrica	Yes	Centrica endorses the views of the modification Group.
RWE Supply & Trading GmbH	Yes	We endorse the views expressed by the P244 Modification Group.
National Grid	Yes	The Alternative Modification will help achieve the Applicable Objectives (c) and (b), as stated in our response to Question 1. In addition, the Alternative Modification proposes will save some of the 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)).
Scottish and Southern Energy	Yes	P244 Alternative would better achieve Applicable Objectives (b) (c) and (d) when compared with the baseline for the reasons outlined in section 8 (pg 9) of the consultation document.
Intergen (UK) Ltd.	Yes	Alternative Modification P244 would provide more transparency and less bias as all companies would have the same data
EDF Energy	Yes	In principle yes, but we need to see the legal text to be sure it is sufficiently well defined to limit the flexibility for future interconnector data to the specific situations envisaged.
E.ON UK	Yes	As per the Proposed, with potentially additional benefits under (d).

Question 3: Would the Alternative Modification P244 help to achieve of the Applicable BSC Objectives when compared to the Proposed Modification?

### Summary

Yes	No	Neutral/Other
8	0	0

### Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	Yes	The Alternative Modification would provide all of the benefits of the Proposed Modification, but would also streamline the process for adding Interconnectors in future with the commensurate cost and time savings.
Centrica	Yes	Centrica endorses the views of the modification Group.
RWE Supply & Trading GmbH	Yes	We support the creation of a robust enduring regime for amendments to data publication for additional interconnectors. This will better facilitate Objective D.
National Grid	Yes	Compared with the proposed modification, the Alternative Modification will better facilitate Applicable BSc Objective (d), as outlined in our response to Question 2.
Scottish and Southern Energy	Yes	P244 Alternative would better achieve Applicable Objectives (b) (c) and (d) when compared with the P244 Original for the reasons outlined in section 8 (pg 9) of the consultation document.
Intergen (UK) Ltd.	Yes	It would save money in the long term as a modification would not need to be raised when further terminal/inter-connectors come on line.
EDF Energy	Yes	In principle yes, but we need to see the legal text to be sure it is sufficiently well defined to limit the flexibility for future interconnector data to the specific situations envisaged
E.ON UK	Yes	Yes, potentially additional benefits under (d) in addition to (b) and (c) as per the Proposed.

#### Question 4: Do you support the implementation approach described in the Consultation document?

#### Summary

Yes	No	Neutral/Other
8	0	0

#### Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	Yes	Minimising the development costs is sensible, hence linking this Modification to that of P243
Centrica	Conditional yes	The implementation approach does not seem to be tied to a date by which there is an Authority decision. If this is as per P243, then Centrica supports this approach.  <a href="#">ELEXON contacted the respondent and has clarified</a>

Respondent	Response	Rationale
		that the implementation approach is identical to P243, but that P244 can be implemented as a standalone Modification if required.
RWE Supply & Trading GmbH	Yes	-
National Grid	Yes	National Grid agrees with simultaneous implementation of P243 and P244 as part of a standard release, as this approach is more cost effective. National Grid considers that, given the lead times for implementing system changes to both Logica and National Grid systems, it may be necessary to consider implementation in the February 2011 release, should implementation in November 2010 release be not achievable.
Scottish and Southern Energy	Yes	Combining the implementation of P243 and P244 together would be the most pragmatic way to proceed.
Intergen (UK) Ltd.	Yes	-
EDF Energy	Yes	(Alongside P243 provisionally implemented in November 2010 if the Authority approves P243 by end of January 2010; or February 2011 if the Authority approves P243 by end of May 2010.)
E.ON UK	Yes	It appears appropriate to implement with P243 if possible.

Question 5: Are there alternative solutions that the Modification Group has not identified, that they should consider?

### Summary

Yes	No	Neutral/Other
0	7	1

### Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	No	-
Centrica	Potentially	Centrica supports the publication of the interconnector information on the BMRS. However we note that as these flows are published as a generation fuel type, they only publish flows into the GB market, and a value of zero is published when exporting. It would be more beneficial to have export and import information published here.

Respondent	Response	Rationale
		<p>Whilst it would appear out of scope for P244 to do this for interconnection flows from France to England and from Northern Ireland to Scotland, this could still be considered for the Britned flow <b>unless there is a valid reason not to</b>.</p> <p>ELEXON contacted the respondent and explained that this information is currently provided on the BMRS and where in particular it could be obtained from. The respondent The respondent is satisfied with the explanation provided.</p>
RWE Supply & Trading GmbH	No	-
National Grid	No	-
Scottish and Southern Energy	No	-
Intergen (UK) Ltd.	No	-
EDF Energy	No	-
E.ON UK	No	-

## Question 6: Do you have any further comments on P244?

### Responses

Respondent	Response
SAIC Ltd. (for and on behalf of ScottishPower)	No
Centrica	No
RWE Supply & Trading GmbH	No
National Grid	No
Scottish and Southern Energy	<p>This response is based solely on the two consultation documents sent in the email of 2nd October 2009 @ 17:33. These two documents, of 7 and 10 pages respectively, do not, for example, include the Modification Proposal itself.</p> <p>What is the legal status of these two documents in terms of what, exactly, will be presented (in totality) to (i) BSC Parties to comment on (ii) the BSC Panel to recommend on and (iii) the Authority to opine on? What is the legal status of any documents that are 'associated' within these two documents?</p> <p>Will all such 'associated' documents form, legally, the complete Final Modification Report (a) that the BSC Panel members must read in coming to their recommendation and (b) the Authority must take into account in their decision making?</p> <p>If the answer is 'yes', has this been confirmed, in writing, from the</p>

Respondent	Response
	<p>Authority?</p> <p>ELEXON contacted the respondent and explained that the legal framework for progressing modifications to the BSC is established as part of Condition C3 of the Transmission Licence and the process for making modifications is set out in Section F of the BSC. Section F of the Code (including annex F1) details each of the phases of the Modification lifecycle and what information should be included in the reports to the Panel and the Authority, which includes the Modification Groups recommendations, consultation responses, legal text and implementation approach. This ensures that there is full transparency with the information that has been used in the progression of the Modification and for the Authority in reaching a decision on a Modification. The respondent confirmed that this was a generic question that was not specific to any particular Modification.</p>
Intergen (UK) Ltd.	<p>InterGen is supportive of this and any modification which increases transparency in the market and in turn helps to lower barriers to entry for new market participants.</p>
EDF Energy	<p>The cost (£112,900, mainly transmission company) seems excessive for what seems a relatively minor change, and compared with the cost of changes for more substantial related proposal P243. We assume that the disbenefit of this cost in relation to BSC objective (d) is outweighed by the benefits for transparency and BSC objectives (b) and (c) which justified the original proposal to publish such data for other interconnectors. We hope this is not being used by the Transmission Company as an opportunity to support related changes to its systems.</p>
E.ON UK	-