

P245 Consultation Responses

Consultation issued on 18 January 2010.

We received responses from the following Parties

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
E.ON UK	5/0	Supplier
SAIC Ltd. (on behalf of ScottishPower)	8/0	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
Scottish and Southern Energy	7/1	Supplier/Generator/ Trader / Party Agent / Distributor
EDF Energy	13/0	Supplier / Generator / Distributor
British Gas	1/0	Supplier

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 unanimous view that the Proposed Modification should be rejected?

Summary

Yes	No	Neutral/Other
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Responses

Respondent	Response	Rationale
E.ON UK	Yes	The Alternative better facilitates the relevant objectives than the original proposal
SAIC Ltd. (on behalf of ScottishPower)	Yes	The Alternative Modification presents a more complete and consistent solution.
Scottish and Southern Energy	Yes	-
EDF Energy	Yes	The alternative modification will better facilitate the relevant objectives than the Proposed and the baseline.
British Gas	Yes	-

Question 2: Do you agree with the Panel's unanimous view that the Alternative Modification should be approved?

Summary

Yes	No	Neutral/Other
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Responses

Respondent	Response	Rationale
E.ON UK	Yes	This will add greater clarity to the rules around the management of the Long Term Vacant Sites process, it will reduce the number of sites that drop out of the process or can't qualify due to the interpretation of the current rules.
SAIC Ltd. (on behalf of ScottishPower)	Yes	The Alternative Modification presents a more complete and consistent solution.
Scottish and Southern Energy	Yes	-

Respondent	Response	Rationale
EDF Energy	Yes	Improvements to the Long Term Vacant Sites process will better facilitate objective c than the baseline. We support the Modification Group view that the improvements suggested by the alternative modification will add clarity and transparency and will ensure that the process is made more efficient.
British Gas	Yes	We agree that the Alternative Modification would help achieve the Applicable BSC Objectives C and D as the change from months to calendar days will add additional clarity, simplicity and transparency as by moving the timescales to the BSCP will enable any future changes to be made more easily

Question 3: Do you agree with the Panel's suggested Implementation Date?

Summary

Yes	No	Neutral/Other
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Responses

Respondent	Response	Rationale
E.ON UK	Yes	Since this is a voluntary process we should aim to have the opportunity for parties to take advantage of the changes as early as possible and not be constrained by trying to achieve this within a standard release programme.
SAIC Ltd. (on behalf of ScottishPower)	Yes	P245 provides a participating Supplier with the opportunity to confirm a site as LTV earlier than the current process allows. ScottishPower will aim to introduce any changes to its processes to accommodate this as soon as possible, following an Authority decision. However, ScottishPower systems will remain compliant until system changes to refine the timescales (as per the modification) can be implemented.
Scottish and Southern Energy	Yes	-
EDF Energy	Yes	We would prefer a later implementation date as referenced in our previous response however we can support the Panel's suggested implementation date.

Respondent	Response	Rationale
British Gas	Yes	Changes should be implemented as soon as possible.

Question 4: Do you agree that the legal text delivers the intention of P245 Proposed Modification?

Summary

Yes	No	Neutral/Other
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Responses

Respondent	Response	Rationale
E.ON UK	Yes	-
SAIC Ltd. (on behalf of ScottishPower)	Yes	It provides the clarity, accuracy and consistency as required by the Proposed Modification. However, this makes the amended clause 2.8.3 inconsistent with LTV timescales elsewhere in Section S, Section 2.8, and Annex S-2, Section 4.3, which indicates the flaws in the Proposed Modification.
Scottish and Southern Energy	Yes	-
EDF Energy	Yes	We have no suggested amendments to the legal text.
British Gas	Yes	-

Question 5: Do you agree that the legal text delivers the intention of P245 Alternative Modification?

Summary

Yes	No	Neutral/Other
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Responses

Respondent	Response	Rationale
E.ON UK	Yes	-
SAIC Ltd. (on behalf of ScottishPower)	Yes	The Alternative Modification provides the required clarity, accuracy and consistency regarding the LTV timescales required throughout Section S, Section 2.8 and Annex S-2, Section 4.3.

Respondent	Response	Rationale
Scottish and Southern Energy	Yes	-
EDF Energy	Yes	We have no suggested amendments to the legal text.
British Gas	Yes	-

Question 6: Do you agree that the BSCP504 redline changes deliver the intention of P245 Proposed Modification?

Summary

Yes	No	Neutral/Other
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Responses

Respondent	Response	Rationale
E.ON UK	Yes	-
SAIC Ltd. (on behalf of ScottishPower)	Yes	It provides the consistency as required by the Proposed Modification. However this makes the amended clause 4.15.1 inconsistent with LTV timescales elsewhere in BSCP504 Section 4.15, which indicates the flaws in the Proposed Modification.
Scottish and Southern Energy	Yes	-
EDF Energy	Yes	We have no suggested amendments to the redline changes.
British Gas	Yes	-

Question 7: Do you agree that the BSCP504 redline changes deliver the intention of P245 Alternative Modification?

Summary

Yes	No	Neutral/Other
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Responses

Respondent	Response	Rationale
E.ON UK	Yes	-
SAIC Ltd. (on behalf of ScottishPower)	Yes	The Alternative Modification provides the consistency required throughout BSCP504 Section 4.15.
Scottish and Southern Energy	Yes	-
EDF Energy	Yes	We have no suggested amendments to the redline changes.
British Gas	Yes	-

Question 8: Do you have any further comments on P245?

Summary

Yes	No	Neutral/Other
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Responses

Respondent	Response	Rationale
E.ON UK	None	-
SAIC Ltd. (on behalf of ScottishPower)	No	-
Scottish and Southern Energy	No	-
EDF Energy	No	-
British Gas	No	-