

Responses from P215 Definition Report Consultation

Consultation Issued on 23 August 2007

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	E.ON UK plc	P215_DR_01	5	0
2.	SmartestEnergy	P215_DR_02	1	0
3.	ConocoPhillips	P215_DR_03	2	0
4.	National Grid	P215_DR_04	1	0
5.	Uskmouth Power Limited	P215_DR_05	1	0
6.	E.ON UK Energy Services Limited	P215_DR_06	0	1
7.	SAIC Ltd. (for and on behalf of ScottishPower)	P215_DR_07	7	0

P215 DEFINITION PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	Ben Sheehy
Company Name:	E.ON UK plc
No. of BSC Parties Represented	5
Parties Represented	Citigen London Ltd., Economy Power, Enfield Energy Centre, Powergen Retail Ltd., E.ON UK plc
No. of Non BSC Parties Represented (e.g. Agents)	0
Non Parties represented	-
Role of Respondent	<i>Supplier/Generator/ Trader / Consolidator / Exemptable Generator</i>
Does this response contain confidential information?	No.

Q	Question	Response ¹	Rationale
1.	Do you support the principle of P215 that FPNs should be used in the calculation of CEI for BM Units defined as generating BM Units to which P215 is applicable? Please give rationale	No	We think it unlikely that the use of FPNs will ensure that sufficient security is posted against trading charges. As a generator's imbalance risk is generally one-way (it is more likely that a unit will trip than it is that it will over-generate), the average FPN will be higher than the average delivered output.
2.	Do you believe that P215 requires further assessment? Please give rationale	Yes	Despite our reservation, we note that the Issue 22 group did consider there to be some level of accuracy for generating units if FPNs were used as a proxy for output. The working group must analyse any relationship in detail if the proposal is to be deemed viable.
3.	Do you support the definition of a generating BM Unit to which P215 is applicable, as described in this document? Please give rationale	Yes	It captures the intention of the proposal.

P215 DEFINITION PROCEDURE CONSULTATION

Q	Question	Response ¹	Rationale
4.	Do you support the automatic inclusion in the definition of BM Units which have Production Status and of Exempt Export BM Units (i.e. if they also satisfy the initial criteria of the definition that they are obliged to submit Physical Notifications and are not an Interconnector BM Unit)? Please give rationale	Yes	This definition appears to capture the intention of the proposal, in that Supplier BM Units would be excluded, and uses existing BSC defined terms. It is also expected that BM systems could manage the definition without the need for new software. Specifically on mandatory inclusion, it would be entirely inappropriate if parties were able to pick and choose their level of security cover.
5.	Do you support the proposal that the Panel would be able to use its discretion to assign status as a generating BM Unit to which P215 is applicable (i.e. if the initial criteria of the definition are satisfied)? Please give rationale	Yes / No	Possibly. It would seem unfair to exclude a consolidator's BMUs if they could not satisfy the criteria but were, in practise, 'generating' units. Unfortunately, by accommodating an appeal to the panel (and potentially an appeal mechanism against the panel's decision) the modification solution could become unwieldy. The working group must therefore outline a neat process if this feature is to be considered workable.
6.	Do you believe there is an alternative definition of a generating BM Unit to which P215 is applicable which would be more suitable, and which should be considered by the P215 Modification Group? Please give definition and rationale	No	The working group investigated this thoroughly. It remains a question only of whether certain consolidators need to be included.
7.	Do you believe that there are any issues that have been overlooked in the Definition Procedure that should be considered? Please give rationale	No	

P215 DEFINITION PROCEDURE CONSULTATION

Q	Question	Response ¹	Rationale
8.	Are there any issues not identified in this report that you believe should be considered during the Assessment Procedure, should the Panel agree to submit P215 to the Assessment Procedure? Please give issues and rationale	Yes	All parties have an interest in ensuring that appropriate levels of security are in place. We have yet to understand why the current arrangements are inappropriate, as we do not believe that the proposer has established that there is currently over-collateralisation. It is important that this assumption is tested.
9.	Are there any Alternatives that you believe should be assessed during the Assessment Procedure? Please give rationale	No	
10.	Are there any further comments on P215 that you wish to make?	Yes	While it is worth investigating the accuracy of the current credit arrangements, we would be keen to ensure that the proposal does not lead to a situation that significantly dilutes parties' responsibility for their own credit cover. It would be contrary to good competition if the wider industry had, in effect, to provide individual parties with partial security.

Please send your responses by **12:00 on Friday 31 August 2007** to modification.consultations@elexon.co.uk and please entitle your email 'P215 Definition Procedure Consultation'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Dean Riddell on 0207 380 4366, email address dean.riddell@elexon.co.uk.

P215 DEFINITION PROCEDURE CONSULTATION QUESTIONS

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Respondent:	<i>Colin Prestwich</i>
Company Name:	<i>SmartestEnergy</i>
No. of BSC Parties Represented	<i>1</i>
Parties Represented	<i>SmartestEnergy</i>
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	
Role of Respondent	<i>Supplier/ Trader / Consolidator /</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you support the principle of P215 that FPNs should be used in the calculation of CEI for BM Units defined as generating BM Units to which P215 is applicable? Please give rationale	Yes	
2.	Do you believe that P215 requires further assessment? Please give rationale	Yes	
3.	Do you support the definition of a generating BM Unit to which P215 is applicable, as described in this document? Please give rationale	Yes	

P215 DEFINITION PROCEDURE CONSULTATION

Q	Question	Response	Rationale
4.	Do you support the automatic inclusion in the definition of BM Units which have Production Status and of Exempt Export BM Units (i.e. if they also satisfy the initial criteria of the definition that they are obliged to submit Physical Notifications and are not an Interconnector BM Unit)? Please give rationale	Yes	
5.	Do you support the proposal that the Panel would be able to use its discretion to assign status as a generating BM Unit to which P215 is applicable (i.e. if the initial criteria of the definition are satisfied)? Please give rationale	Yes	
6.	Do you believe there is an alternative definition of a generating BM Unit to which P215 is applicable which would be more suitable, and which should be considered by the P215 Modification Group? Please give definition and rationale	No	
7.	Do you believe that there are any issues that have been overlooked in the Definition Procedure that should be considered? Please give rationale	No	
8.	Are there any issues not identified in this report that you believe should be considered during the Assessment Procedure, should the Panel agree to submit P215 to the Assessment Procedure? Please give issues and rationale	No	

P215 DEFINITION PROCEDURE CONSULTATION

Q	Question	Response	Rationale
9.	Are there any Alternatives that you believe should be assessed during the Assessment Procedure? Please give rationale	No	
10.	Are there any further comments on P215 that you wish to make?	No	

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P215 DEFINITION PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	<i>Andrew Murray</i>
Company Name:	<i>ConocoPhillips</i>
No. of BSC Parties Represented	<i>2</i>
Parties Represented	<i>ConocoPhillips (U.K.) Limited, Immingham CHP LLP</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>0</i>
Non Parties represented	
Role of Respondent	<i>Trader & Generator</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response ¹	Rationale
1.	Do you support the principle of P215 that FPNs should be used in the calculation of CEI for BM Units defined as generating BM Units to which P215 is applicable? Please give rationale	Yes	We believe the FPN is a better estimate for actual generation than GC multiplied by a probabilistic Load Factor
2.	Do you believe that P215 requires further assessment? Please give rationale	No	It has been given enough assessment within the Mod Group
3.	Do you support the definition of a generating BM Unit to which P215 is applicable, as described in this document? Please give rationale	Yes	It will allow the benefits of the modification to be applied to the more market participants

P215 DEFINITION PROCEDURE CONSULTATION

Q	Question	Response ¹	Rationale
4.	Do you support the automatic inclusion in the definition of BM Units which have Production Status and of Exempt Export BM Units (i.e. if they also satisfy the initial criteria of the definition that they are obliged to submit Physical Notifications and are not an Interconnector BM Unit)? Please give rationale	Yes	It will allow the benefits of the modification to be applied to the more market participants
5.	Do you support the proposal that the Panel would be able to use its discretion to assign status as a generating BM Unit to which P215 is applicable (i.e. if the initial criteria of the definition are satisfied)? Please give rationale	Yes	The definition of BM Unit has been selected to be as inclusive as possible so allowing the Panel discretion to ultimately assign status seems sensible
6.	Do you believe there is an alternative definition of a generating BM Unit to which P215 is applicable which would be more suitable, and which should be considered by the P215 Modification Group? Please give definition and rationale	No	
7.	Do you believe that there are any issues that have been overlooked in the Definition Procedure that should be considered? Please give rationale	No	
8.	Are there any issues not identified in this report that you believe should be considered during the Assessment Procedure, should the Panel agree to submit P215 to the Assessment Procedure? Please give issues and rationale	No	

P215 DEFINITION PROCEDURE CONSULTATION

Q	Question	Response ¹	Rationale
9.	Are there any Alternatives that you believe should be assessed during the Assessment Procedure? Please give rationale	No	
10.	Are there any further comments on P215 that you wish to make?	No	

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P215 DEFINITION PROCEDURE CONSULTATION QUESTIONS

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Respondent:	Lilian Macleod
Company Name:	National Grid Electricity Transmission plc
No. of BSC Parties Represented	1
Parties Represented	Transmission Company
No. of Non BSC Parties Represented (e.g. Agents)	N/A
Non Parties represented	N/A
Role of Respondent	Transmission Company
Does this response contain confidential information?	No

Q	Question	Response ₁	Rationale
1.	Do you support the principle of P215 that FPNs should be used in the calculation of CEI for BM Units defined as generating BM Units to which P215 is applicable? Please give rationale	N/A	As the transmission operator is unaffected by credit exposure it would seem inappropriate to offer an opinion on this proposal.

Q	Question	Response 1	Rationale
2.	<p>Do you believe that P215 requires further assessment?</p> <p>Please give rationale</p>	Yes	<p>We believe that it would be prudent to further assess this proposal in the following areas:</p> <ul style="list-style-type: none"> Is there any impact on the likely accuracy of FPN submissions to the System Operator? From both an IS and code perspective, how will the inclusion of FPN from parties who currently don't have an obligation to provide FPN be achieved? <p>Both these issues may have a material impact on costs that need to be assessed.</p>
3.	<p>Do you support the definition of a generating BM Unit to which P215 is applicable, as described in this document?</p> <p>Please give rationale</p>	Neutral	
4.	<p>Do you support the automatic inclusion in the definition of BM Units which have Production Status and of Exempt Export BM Units (i.e. if they also satisfy the initial criteria of the definition that they are obliged to submit Physical Notifications and are not an Interconnector BM Unit)?</p> <p>Please give rationale</p>	Neutral	
5.	<p>Do you support the proposal that the Panel would be able to use its discretion to assign status as a generating BM Unit to which P215 is applicable (i.e. if the initial criteria of the definition are satisfied)?</p> <p>Please give rationale</p>	Neutral	

Q	Question	Response 1	Rationale
6.	Do you believe there is an alternative definition of a generating BM Unit to which P215 is applicable which would be more suitable, and which should be considered by the P215 Modification Group? Please give definition and rationale	Neutral	
7.	Do you believe that there are any issues that have been overlooked in the Definition Procedure that should be considered? Please give rationale	Yes	Concerns regarding the submission of FPN by parties who don't currently have access to the relevant IT system. How will the information be submitted, under what processes i.e. where would the obligations sit?
8.	Are there any issues not identified in this report that you believe should be considered during the Assessment Procedure, should the Panel agree to submit P215 to the Assessment Procedure? Please give issues and rationale	No	
9.	Are there any Alternatives that you believe should be assessed during the Assessment Procedure? Please give rationale	No	
10.	Are there any further comments on P215 that you wish to make?	No	

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P215 DEFINITION PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	Name Rebecca Williams
Company Name:	Uskmouth Power Limited
No. of BSC Parties Represented	1
Parties Represented	Uskmouth Power Limited
No. of Non BSC Parties Represented (e.g. Agents)	none
Non Parties represented	
Role of Respondent	Generator
Does this response contain confidential information?	No

Q	Question	Response ¹	Rationale
1.	Do you support the principle of P215 that FPNs should be used in the calculation of CEI for BM Units defined as generating BM Units to which P215 is applicable? Please give rationale	Yes	The use of FPN to determine the credit cover required by a generating BM Unit allows an accurate calculation, at the appropriate level that reflects the risks posed to the market, than at present, through the use of historical performance, GC and CALF values.
2.	Do you believe that P215 requires further assessment? Please give rationale	Yes	This proposal has been raised through the analysis provided within Issue 22 Indebtedness on 18th January 2006, concluding 'that FPN's for Supplier BM Units were not particularly accurate. However, FPN's for other BM Units were believed to be reasonably accurate.' However, it is unclear whether the analysis includes exempt export BM Units. Further analysis including the accuracy of FPN for exempt export BM Units is required. Uskmouth also recognises that there may be issues associated with tripping and concerns about FPN accuracy changing without incentives or monitoring that need considering.

P215 DEFINITION PROCEDURE CONSULTATION

Q	Question	Response ¹	Rationale
3.	Do you support the definition of a generating BM Unit to which P215 is applicable, as described in this document? Please give rationale	No	The definition of generating BM Unit should be the sole means of determining whether P215 is applicable. The third criteria of BSC Panel involvement in determining a generating BM Unit is far too onerous. Uskmouth notes that there may well be a case for further modifications to address the many deficiencies with the BSC's credit arrangements, but this modification is not the right vehicle for that work.
4.	Do you support BM Units which Production Status and Exempt Export BM Units automatically falling within the definition (i.e. if they also satisfy the initial criteria of the definition that they are obliged to submit Physical Notifications and are not an Interconnector BM Unit)? Please give rationale	Yes	The modification permits FPN to be used to calculate the credit cover for a generating BM Unit. The proposal has been limited to generating BM Unit due to the analysis provided within Issue 22 Indebtedness. It is unclear within the analysis whether exempt export BM Unit are included. Accurate FPN need to be submitted for P215 to be applied for a generating BM Unit.
5.	Do you support that the Panel would be able to use its discretion to assign status as a generating BM Unit to which P215 is applicable (i.e. if the initial criteria of the definition are satisfied)? Please give rationale	No	The proposal stated that BSC Objective (d) is facilitated by a reduction in the BSCCo effort needed to manage CALF issues such as seasonal calculation and appeals. As a consequence of introducing Panel discretion to assign a generating BM Unit status, addition work is imposed, not intended by the proposer.
6.	Do you believe there is an alternative definition of a generating BM Unit to which P215 is applicable which would be more suitable, and which should be considered by the P215 Modification Group? Please give definition and rationale	Yes	Limiting the definition to those production BM Units registered in CVA.
7.	Do you believe that there are any issues that have been overlooked in the Definition Procedure that should be considered? Please give rationale	No	

P215 DEFINITION PROCEDURE CONSULTATION

Q	Question	Response ¹	Rationale
8.	Are there any issues not identified in this report that you believe should be considered during the Assessment Procedure, should the Panel agree to submit P215 to the Assessment Procedure? Please give issues and rationale	Yes	Whether exempt export BM Units submit accurate FPN and how is this governed. Are exempt export BM Units signatories to the Grid Code?
9.	Are there any Alternatives that you believe should be assessed during the Assessment Procedure? Please give rationale	No	Uskmouth recognises that the assessment phase may throw up concerns that would lead to an alternative that “fine tunes” the basic concept.
10.	Are there any further comments on P215 that you wish to make?	No	

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Respondent:	<i>Alastair Barnsley</i>
Company Name:	<i>E.ON UK Energy Services Limited</i>
No. of BSC Parties Represented	<i>0</i>
Parties Represented	
No. of Non BSC Parties Represented (e.g. Agents)	<i>1</i>
Non Parties represented	<i>E.ON UK Energy Services Limited</i>
Role of Respondent	<i>Party Agent</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response ¹	Rationale
1.	Do you support the principle of P215 that FPNs should be used in the calculation of CEI for BM Units defined as generating BM Units to which P215 is applicable? Please give rationale	Yes / No	We should like to maintain a neutral position as this proposal will have no direct impact on our activities
2.	Do you believe that P215 requires further assessment? Please give rationale	Yes / No	Please see response to question 1
3.	Do you support the definition of a generating BM Unit to which P215 is applicable, as described in this document? Please give rationale	Yes / No	Please see response to question 1

P215 DEFINITION PROCEDURE CONSULTATION

Q	Question	Response ¹	Rationale
4.	Do you support the automatic inclusion in the definition of BM Units which have Production Status and of Exempt Export BM Units (i.e. if they also satisfy the initial criteria of the definition that they are obliged to submit Physical Notifications and are not an Interconnector BM Unit)? Please give rationale	Yes / No	Please see response to question 1
5.	Do you support the proposal that the Panel would be able to use its discretion to assign status as a generating BM Unit to which P215 is applicable (i.e. if the initial criteria of the definition are satisfied)? Please give rationale	Yes / No	Please see response to question 1
6.	Do you believe there is an alternative definition of a generating BM Unit to which P215 is applicable which would be more suitable, and which should be considered by the P215 Modification Group? Please give definition and rationale	Yes / No	Please see response to question 1
7.	Do you believe that there are any issues that have been overlooked in the Definition Procedure that should be considered? Please give rationale	Yes / No	Please see response to question 1
8.	Are there any issues not identified in this report that you believe should be considered during the Assessment Procedure, should the Panel agree to submit P215 to the Assessment Procedure? Please give issues and rationale	Yes / No	Please see response to question 1

P215 DEFINITION PROCEDURE CONSULTATION

Q	Question	Response ¹	Rationale
9.	Are there any Alternatives that you believe should be assessed during the Assessment Procedure? Please give rationale	Yes/No	Please see response to question 1
10.	Are there any further comments on P215 that you wish to make?	No	

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Respondent:	Gary Henderson
Company Name:	SAIC Ltd. (for and on behalf of ScottishPower)
No. of BSC Parties Represented	7
Parties Represented	ScottishPower Energy Management Ltd, ScottishPower Generation Ltd, ScottishPower Energy Retail Ltd, SP Transmission Ltd, SP Manweb plc, SP Distribution Ltd, CRE Energy Limited
No. of Non BSC Parties Represented (e.g. Agents)	0
Non Parties represented	N/A
Role of Respondent	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
Does this response contain confidential information?	No

Q	Question	Response ¹	Rationale
1.	Do you support the principle of P215 that FPNs should be used in the calculation of CEI for BM Units defined as generating BM Units to which P215 is applicable? Please give rationale	Yes	FPN data will provide a more accurate expression of a Parties credit exposure on a period by period basis than the use of Generation Capacity could. The current methodology forces generators to over capitalise their credit cover – capital which should be released to allow the funding of investment.
2.	Do you believe that P215 requires further assessment? Please give rationale	Yes	Although we support the principle behind the Modification Proposal, it is only prudent to investigate the change as thoroughly as possible before approval. In particular, the process of FPN submission by all relevant parties and their validation would need to be further developed.

P215 DEFINITION PROCEDURE CONSULTATION

Q	Question	Response ¹	Rationale
3.	Do you support the definition of a generating BM Unit to which P215 is applicable, as described in this document? Please give rationale	Yes	The definition captures all generating plant which can submit an FPN, regardless of where they are registered. The definition also allows for the inclusion of non-standard BMU's through the application process.
4.	Do you support the automatic inclusion in the definition of BM Units which have Production Status and of Exempt Export BM Units (i.e. if they also satisfy the initial criteria of the definition that they are obliged to submit Physical Notifications and are not an Interconnector BM Unit)? Please give rationale	Yes	These BMU's make up the bulk of the generating plants in the U.K.
5.	Do you support the proposal that the Panel would be able to use its discretion to assign status as a generating BM Unit to which P215 is applicable (i.e. if the initial criteria of the definition are satisfied)? Please give rationale	Yes	There are a number of non-standard generating units currently on the grid (with potential for more on the way). As such, the benefits of the new methodology should be available to them as well. It is impossible to write a definition which encompasses all of these, and so the application process allows a catch-all for these plants. Without this process, valid generators would be discriminated against.
6.	Do you believe there is an alternative definition of a generating BM Unit to which P215 is applicable which would be more suitable, and which should be considered by the P215 Modification Group? Please give definition and rationale	No	
7.	Do you believe that there are any issues that have been overlooked in the Definition Procedure that should be considered? Please give rationale	No	

P215 DEFINITION PROCEDURE CONSULTATION

Q	Question	Response ¹	Rationale
8.	Are there any issues not identified in this report that you believe should be considered during the Assessment Procedure, should the Panel agree to submit P215 to the Assessment Procedure? Please give issues and rationale	No	
9.	Are there any Alternatives that you believe should be assessed during the Assessment Procedure? Please give rationale	Yes	See comments below.
10.	Are there any further comments on P215 that you wish to make?	Yes	ScottishPower believe that an alternative to include Supplier BMU's under the revised calculation methodology should be considered. We acknowledge the initial analysis done by the Issue 22 group surrounding the accuracy of Supplier FPNs, however we feel that, while not completely accurate compared to actual metered volume, the FPN's are almost certainly more accurate than the current methodology utilising DC and CALF values. Qualifying Demand BMU's should be allowed access to the benefits of more accurate and representative credit cover levels. This would remove any discriminatory aspect of the current modification proposal.

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