

ELEXON

What stage is this document in the process?

01

Initial Written Assessment

02

Definition Procedure

03

Assessment Procedure

04

Report Phase

P254 Consultation Responses

Consultation issued on 15 March 2010

We received responses from the following Parties

| Company | No BSC Parties / Non- Parties Represented | Role of Parties/non- Parties represented |
|--|--|---|
| RWE Npower Limited | 8/0 | Supplier / Party Agent |
| EDF Energy | 13/0 | Supplier/Generator/Trader/Co nsolidator/Exemptable Generator/Party Agent/Distributor |
| E.ON UK | 5/0 | Supplier |
| SAIC Ltd. (for and on behalf of ScottishPower) | 7/0 | Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor |

Question 1: Do you agree the legal text delivers the intention of P254?

Summary

| Yes | No | Neutral/Other |
|-----|----|---------------|
| 4 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------------------------|----------|-----------|
| RWE Npower Limited | Yes | - |
| EDF Energy | Yes | - |
| E.ON UK | Yes | |
| SAIC Ltd. (for and on behalf of | Yes | - |

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| Respondent | Response | Rationale |
|----------------|----------|-----------|
| ScottishPower) | | |

Question 2: Do you agree with the Panel's suggested implementation approach?

Summary

| Yes | No | Neutral/Other |
|-----|----|---------------|
| 4 | | |

Responses

| Respondent | Response | Rationale |
|--|----------|--|
| RWE Npower Limited | Yes | - |
| EDF Energy | Yes | 5 working days from Authority decision seems a practical and efficient approach. |
| E.ON UK | Yes | - |
| SAIC Ltd. (for and on behalf of ScottishPower) | Yes | Implementation should be as soon as possible, after and Authority decision |

Question 3: Do you agree with the Panel's initial recommendation that P254 will better facilitate the achievement of Applicable BSC Objective (d) when compared with the existing BSC requirements and that P254 should therefore be approved?

Summary

| Yes | No | Neutral/Other |
|-----|----|---------------|
| 4 | 0 | |

Responses

| Respondent | Response | Rationale |
|------------|----------|--|
| RWE Npower | Yes | Removing the changeable value seems a sensible |

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| Respondent | Response | Rationale |
|--|----------|--|
| Limited | | option. This will enable a more efficient and effective process. |
| EDF Energy | Yes | - |
| E.ON UK | Yes | The modification will remove any ambiguity in where the charges will be found and will give certainty to new entrants. |
| SAIC Ltd. (for and on behalf of ScottishPower) | Yes | It seems sensible to remove configurable and changeable values, such as these charges from the Code itself, making it a more efficient process to amend these as and when required. This is consistent with other BSC parameters. As such, it will make administration of the BSC more efficient (Objective d) |

Question 4: Do you have any further comments on P254?

Responses

| Respondent | Comments |
|--|--|
| RWE Npower Limited | No |
| EDF Energy | The legal text states that Panel determined charge rates shall be "notified to Parties by the Panel by publication on the BSC Website": 1. It would be preferable if explicit notice, for example via Elexon Circular, could also be given. |
| | 2. All charge rates, past, present, and agreed for the future, with applicable dates, should be published on the BSC Website, preferably in a conveniently downloadable format, for example version numbered/dated pdf document and spreadsheet. The legal text can be interpreted to require this desirable easily auditable record of values. This could be as well as, or instead of, the existing display of "current" values. |
| E.ON UK | No |
| SAIC Ltd. (for and on behalf of ScottishPower) | No |

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