

P261 Consultation Responses

Consultation issued on 11 June 2010

We received responses from the following Parties

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
MRASCo Ltd	0/1	MRA
Western Power Distribution	2/1	Distributor/MOA
National Grid	1/0	Transmission Company
Electricity North West Ltd	1/0	LDSO
TMA Data Management Ltd	0/1	HHDC, HHDA, NHHDC and NHHDA
Accenture (UK) Limited (for and on behalf of ScottishPower)	7/0	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
Npower limited	9/0	Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent

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 approved?

Summary

Yes	No	Neutral/Other
7	0	0

Responses

Respondent	Response	Rationale
MRASCo Ltd	Yes	Provides the opportunity to correct manifest errors going back to the start of a BSC year; means Parties impacted by material manifest errors have error corrected going back to the start of a BSC year; and eliminates the confusion between the BSC and BSCP128.
Western Power Distribution	Yes	This change is clearly rectifying an error in the BSC wording that was introduced when implementing modification P216. It therefore meets BSC objective d as it improves the efficiency of the BSC arrangements.
National Grid	Yes	We agree with the panel's view that the Proposed Modification should be approved as it would better facilitate Applicable Objective (d) 'promoting efficiency in the implementation and administration of the balancing and settlement arrangements'.
Electricity North West Ltd	Yes	We agree that the BSC needs to reflect the approved version of Principle 15. This will allow the Panel to correct manifest errors going back to the start of a BSC year, subsequently allowing Parties impacted by a manifest error to have it corrected. Also ensuring that the BSC correctly reflects principle 15 of the BSCP128.
TMA Data Management Ltd	Yes	Modification P261 is required in order to correct the legal text to truly reflect P216's intentions.
Accenture (UK) Limited (for and on behalf of ScottishPower)	Yes	The Case for Change put forward by the Panel is in the opinion of ScottishPower a sound one.
Npower limited	Yes	The additional drafting of the legal text better facilitates the original intention of BSC Modification P216.

Question 2: Do you agree with the Panel's suggested Implementation Date of 5 Working Days after an Authority decision?

Summary

Yes	No	Neutral/Other
7	0	0

Responses

Respondent	Response	Rationale
MRASCo Ltd	Yes	This is the standard length of time for a proposal of this nature.
Western Power Distribution	Yes	No changes to our systems or processes are required so this implementation date is suitable
National Grid	Yes	We do not anticipate an impact on the Transmission Company and therefore see no reason why the suggested Implementation Date of 5 Working Days after an Authority Decision shouldn't go ahead.
Electricity North West Ltd	Yes	-
TMA Data Management Ltd	Yes	The low impact P261 allows for a fast implementation after an Authority's decision.
Accenture (UK) Limited (for and on behalf of ScottishPower)	Yes	As the solution would be a Code only change it would be sensible to implement ASAP.
Npower limited	Yes	We do not anticipate any system or process changes will need to be made to accommodate this modification and as such we can accept the proposed time-scales.

Question 3: Do you agree that the legal text delivers the intention of P261?

Summary

Yes	No	Neutral/Other
7	0	0

Responses

Respondent	Response	Rationale
MRASCo Ltd	Yes	Correction of manifest errors in accordance with BSCP128 (rather than the BSC).
Western Power Distribution	Yes	-
National Grid	Yes	We agree that the legal text delivers the intention of P261
Electricity North West Ltd	Yes	-
TMA Data Management Ltd	Yes	-
Accenture (UK) Limited (for and on behalf of ScottishPower)	Yes	The legal text now appears fit for purpose.
Npower limited	Yes	The additional legal drafting clarifies and facilitates the intent of the original (P216) BSC Modification.

Question 4: Do you have any further comments on P261?

Summary

Yes	No	Neutral/Other
1	6	0

Responses

Respondent	Response
MRASCo Ltd	No
Western Power Distribution	No
National Grid	No
Electricity North West Ltd	No
TMA Data Management Ltd	No
Accenture (UK) Limited (for and	No

Respondent	Response
on behalf of ScottishPower)	
Npower limited	<p>Yes - Having reviewed the documentation provided we have two final points that we wish to raise for consideration:</p> <p>P261RR01, page 3, Section headed Solution, second bullet point dealing with the solution for material manifest errors:</p> <p>The wording on the first two bullet points is not very clear, we therefore suggest the following:</p> <ul style="list-style-type: none"> • Where there is a material manifest error that has been identified within a BSC year: <ul style="list-style-type: none"> ○ such changes would be back dated to the start of the BSC year (1 April) for which they have been approved; ○ and that year is 1 April 2010 to 1 April 2011 these errors can be back dated to 1 April 2010 i.e. before the implementation of P261 <p>With regard to the legal text drafting, attachment B:</p> <p>We suggest that the legal text should end with something like "or any year thereafter", as the current drafting could be misinterpreted as though there is a limit to the application of the proposed solution to just the BSC Year commencing 1 April 2010.</p>