

Responses from P192 Draft Report Consultation

Consultation Issued 15 August 2005

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	National Grid	P192_dMR_001	1	0
2.	RWE Npower	P192_dMR_002	11	0
3.	Scottish and Southern	P192_dMR_003	5	0
4.	British Energy	P192_dMR_004	5	0

P192 REPORT PHASE 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:	National Grid Electricity Transmission plc
No. of Parties Represented	1
Parties Represented	National Grid Electricity Transmission plc
No. of Non Parties Represented	0
Non Parties represented	N/A
Role of Respondent	Transmission System Operator

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P192 and the provisional recommendation to the Authority contained in the draft Modification Report that P192 should be made? Please give rationale.	Yes	National Grid agrees with the Panel's provisional recommendation on the basis that P192 will better facilitate Applicable BSC Objectives a) and d).
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	The legal text is straightforward and correctly addresses the issue in P192.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P192? Please give rationale.	Yes	The changes are minor and therefore can be readily implemented within the standard 5 working days after any positive Authority decision.
4.	Are there any further comments on P192 that you wish to make?	No	

Please send your responses by **17:00 on Day 24 August 2005** to modification.consultations@elexon.co.uk and please entitle your email 'P192 Report Phase Consultation'. Please note that any responses received after the deadline may not receive due consideration by the Panel.

Any queries on the content of the consultation pro-forma should be addressed to Sakib Azam on 020 7380 4316, email address sakib.azam@elexon.co.uk.

P192 REPORT PHASE CONSULTATION QUESTIONS

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Respondent:	<i>Terry Ballard</i>
No. of Parties Represented	11
Parties Represented	RWE Trading GmbH; RWEpower plc; npower cogen Ltd; npower cogen trading Ltd; npower Ltd; npower direct Ltd; npower northern Ltd; npower northern supply Ltd; npower yorkshire Ltd; npower yorkshire supply Ltd; npower commercial gas Ltd
No. of Non Parties Represented	
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state ¹)</i>

Q	Question	Response ¹	Rationale
1.	Do you agree with the Panel's views on P192 and the provisional recommendation to the Authority contained in the draft Modification Report that P192 should / should not be made? Please give rationale.	Yes	We believe the modification should be made.
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P192? Please give rationale.	Yes	
4.	Are there any further comments on P192 that you wish to make?	No	

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¹ Delete as appropriate – please do not use strikethrough, this is to make it easier to analyse the responses

Dear Sirs,

This response is sent on behalf of Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd.

In relation to the four questions contained within your note of 15th August 2005, and the associated Consultation for P192, we have the following comments to make: -

Q1 Do you agree with the Panel's views on P192 and the provisional recommendation to the Authority contained in the draft Modification Report that P192 should be made? Please give rationale.

Yes, we agree with the proposed BSC Panel recommendation to the Authority that Modification Proposal P192 should be made for the reasons outlined in the Modification Report.

Q2 Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.

It appears to.

Q3 Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P192? Please give rationale.

If the Modification Proposal P192 is approved, we agree with the proposed BSC Panel recommendation regarding the timing for the Implementation Date, as outlined in the Modification Report.

Q4 Are there any further comments on P192 that you wish to make?

Nothing further at this time.

Regards

Garth Graham
Scottish and Southern plc

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Respondent:	<i>Louise Allport</i>
No. of Parties Represented	5
Parties Represented	<i>British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Power and Energy Trading, British Energy Direct Ltd, Eggborough Power Ltd</i>
No. of Non Parties Represented	
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>Supplier/Generator/ Trader/Consolidator/Exemptable Generator/Party Agent</i>

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P192 and the provisional recommendation to the Authority contained in the draft Modification Report that P192 should be made? Please give rationale.	Yes	Agree with the change of name although the changes made to the BSC and subsidiary documents should be 'future' proofed as far as possible against further change to avoid this scenario re-occurring. I.e. References should refer to the Transmission Company rather than NGET.
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	Agree provided that the changes to the CSDs are done at an opportune time and at minimum cost.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P192? Please give rationale.	Yes	
4.	Are there any further comments on P192 that you wish to make?	No	

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