

Responses from P190 Assessment Consultation

Consultation Issued 12 August 2005

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	British Gas Trading	P190_AR_001	1	0
2.	EDF Energy	P190_AR_002	9	0
3.	Power Technology MOA	P190_AR_003	0	1
4.	RWE npower	P190_AR_004	10	0
5.	Scottish Power	P190_AR_005	6	0
6.	British Energy	P190_AR_006	5	0
7.	SSE Energy	P190_AR_007	6	1
8.	Metering Services	P190_AR_008	0	1

P190 ASSESSMENT 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:	Mark Manley
No. of Parties Represented	
Parties Represented	British Gas Trading (BGT)
No. of Non Parties Represented	
Non Parties represented	
Role of Respondent	

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you believe Proposed Modification P190 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	BGT believe P190 will better facilitate Applicable BSC Objective (d). BGT believe the proposed solution increases the efficiency of the CDCA role. BGT note the potential for the CDCA contract to be re-negotiated, subject to this modification proposal being approved BGT believe ELEXON should re-open the contract and achieve the cost savings suggested. BGT do not believe there will be any noticeable improvements in Applicable BSC Objectives (c) and (b). BGT believe the benefits to be negligible when measured against Objectives (c) and (b) and therefore question the initial conclusions of the group.
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
3.	Should Meter Operator Agents, who were directly or indirectly affiliated with the Registrant of the Metering	Yes	BGT believe the arrangements are sufficiently robust to ensure the continued integrity of settlements. The TAA visits provide a level of

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	Systems' company, be allowed to carry out witnessing and sealing work on that Metering System (bearing in mind they will still be subject to Technical Assurance visits)? Please give rationale		assurance to the market. Secondly, as these sites are dialled remotely it should be relatively simple to detect if there are any issues with the metering system.
4.	Do agree with the Group's suggestion that the requirements and processes for sealing should be based on the Meter Operators Code of Practice Agreement? Please give rationale	Yes	BGT support the group's suggestion in respect of sealing.
5.	Do agree with the Group's suggestion that ELEXON should hold a copy of the sealing pliers register as detailed in section 2.3 of the consultation document? Please give rationale	Yes	BGT agrees that ELEXON should hold a copy of the sealing pliers register as it should not be an onerous obligation.
6.	Do you think that using 3 rd party contractors raises any issues that need to be considered by the P190 Modification Group as detailed in section 2.3 of the consultation document? Please give rationale	No	
7.	Does P190 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
8.	Are there any further comments on P190 that you wish to make?	No	

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

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Respondent:	EDF Energy
No. of Parties Represented	9
Parties Represented	EDF Energy Networks (EPN) plc; EDF Energy Networks (LPN) plc; EDF Energy Networks (SPN) plc; EDF Energy (Sutton Bridge Power); EDF Energy (Cottam Power) Ltd; EDF Energy (West Burton Power) Ltd; EDF Energy plc; London Energy plc; Seeboard Energy Limited
No. of Non Parties Represented	0
Non Parties represented	N/A
Role of Respondent	Supplier/Generator/Trader

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P190 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	However, please note our response to question 3. Current process adds overheads in terms of time and costs. Benefits accruing from this process do not seem to be tangible in terms of reductions of any risks. This modification removes these overheads and should better facilitate BSC objectives (c) and (d). We note the rationale within this consultation document on objective (b) but are not in a position to comment on this area.
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	Proposed solution provides a way forward that requires minimum change whilst getting the maximum benefit.

Q	Question	Response	Rationale
3.	Should Meter Operator Agents, who were directly or indirectly affiliated with the Registrant of the Metering Systems' company, be allowed to carry out witnessing and sealing work on that Metering System (bearing in mind they will still be subject to Technical Assurance visits)? Please give rationale	Yes	If this is not possible then a party could be unfairly prejudiced if they have to make alternative arrangements for sealing and witnessing. If this is the case then this modification will have no benefit for those parties. In this case then this proposal would not better facilitate BSC objectives as it does not enable parties to compete on the same basis.
4.	Do agree with the Group's suggestion that the requirements and processes for sealing should be based on the Meter Operators Code of Practice Agreement? Please give rationale	Yes	It would be worth utilising just those relevant parts as a basis for a new type of agreement to cover CVA metering sealing and witnessing. As part of this new agreement we would also support a central sealing pliers register as noted below.
5.	Do agree with the Group's suggestion that ELEXON should hold a copy of the sealing pliers register as detailed in section 2.3 of the consultation document? Please give rationale	Yes	This would benefit Technical Assurance Agent as they would be able to carry out checks that sealing is being carried out by a relevant agent.
6.	Do you think that using 3 rd party contractors raises any issues that need to be considered by the P190 Modification Group as detailed in section 2.3 of the consultation document? Please give rationale	No	Part of the agreement that could be put in place would need to state that MOs are responsible for any 3 rd party contractors that are employed.
7.	Does P190 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	Yes	We would wish to see how, if agreed, the process for creating and managing the central sealing pliers register will operate. This would be crucial in determining our own processes will need to be amended to take account of this modification.
8.	Are there any further comments on P190 that you wish to make?	Yes / No	

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Respondent:	<i>Glenn Spirrett</i>
No. of Parties Represented	<i>1</i>
Parties Represented	<i>PTCMOA</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>Party Agent</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you believe Proposed Modification P190 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	The proposal will meet the BSC objectives, however care must taken to ensure that the workload of the MOA is not increased. For instance, there should be no requirement for the MOA to check meter readings with the CDCA while on site, a record of readings can be sent to the CDCA at a later date.
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	See Question 1 and Question 5.
3.	Should Meter Operator Agents, who were directly or indirectly affiliated with the Registrant of the Metering Systems' company, be allowed to carry out witnessing and sealing work on that Metering System? Please give rationale	Yes	The affiliation of the MOA should have no impact, at present, some MOA's already work across Commercial boundaries with no effect on either party.

Q	Question	Response Error! Bookmark not defined.	Rationale
4.	Do agree with the Group's suggestion that the requirements and processes for sealing should be based on the Meter Operators Code of Practice Agreement? Please give rationale	Yes/No	No knowledge of Meter Operators Code of Practice
5.	Do agree with the Group's suggestion that ELEXON should hold a copy of the sealing pliers register? Please give rationale	No	The register of sealing pliers should be held by the CRA, not the MOA. Under BSCP38, it is necessary to authorise anyone who will be required to break seals. It should be a simple matter to add another line to the existing BSCP38 form to allow for detail of sealing pliers issued to the person. Thus, it would be simple to gain access to the register for any interested party.
6.	Do you agree that 3 rd party contractors should be allowed to use their registered sealing pliers when working for another MOA (alternatively they would be required to have multiple sets of pliers)? Please give rationale	Yes	As long as the pliers are registered centrally (see above). Also, there is a considerable waiting time (approx 3 months) for new sealing pliers.
7.	Does P190 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	Yes	With reference to Question 1, the proposal for the MOA to check meter advance with the CDCA while on site will place an extra burden on the MOA, and hence increase costs.
8.	Are there any further comments on P190 that you wish to make?	No	

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Respondent:	Lorna Short
No. of Parties Represented	10
Parties Represented	RWE Trading GmbH, RWE Npower plc, Npower Co-gen Ltd, Npower Co-gen Trading Ltd, Npower Direct Ltd, Npower Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd
No. of Non Parties Represented	0
Non Parties represented	
Role of Respondent	Supplier/Generator/ Trader

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you believe Proposed Modification P190 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	It would lead to greater efficiency for MOAs and the CDCA and thereby reduce costs to all BSC Parties.
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
3.	Should Meter Operator Agents, who were directly or indirectly affiliated with the Registrant of the Metering Systems' company, be allowed to carry out witnessing and sealing work on that Metering System (bearing in mind they will still be subject to Technical Assurance visits)? Please give rationale	Yes	We do not believe that the integrity of the CVA MOAs is an issue of concern.

Q	Question	Response Error! Bookmark not defined.	Rationale
4.	Do agree with the Group's suggestion that the requirements and processes for sealing should be based on the Meter Operators Code of Practice Agreement? Please give rationale	Yes	The principles in MOCOPA for sealing requirements are sound. WE would not support all CVA MOAs being required to become signatories to MOCOPA.
5.	Do agree with the Group's suggestion that ELEXON should hold a copy of the sealing pliers register as detailed in section 2.3 of the consultation document? Please give rationale	Yes	We agree that Elexon should hold a list of the company identifiers while the CVA MOA should hold a list of the numbers allocated. We think it is prudent to have separate sealing pliers for SVA and CVA.
6.	Do you think that using 3 rd party contractors raises any issues that need to be considered by the P190 Modification Group as detailed in section 2.3 of the consultation document? Please give rationale	No	We would not have an issue with a different CVA MOAs sealing pliers being used by an authorised 3 rd party contractor on our sites.
7.	Does P190 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
8.	Are there any further comments on P190 that you wish to make?	No	

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Respondent:	John W Russell (SAIC Ltd)
No. of Parties Represented	6
Parties Represented	Scottish Power UK plc; ScottishPower Energy Management Ltd.; ScottishPower Generation Ltd; ScottishPower Energy Retail Ltd.; SP Transmission Ltd; SP Manweb plc.
No. of Non Parties Represented	0
Non Parties represented	Please list all non Parties responding on behalf of (including the respondent company if relevant).
Role of Respondent	Supplier / Generator / Trader / Consolidator / Exemptable Generator

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P190 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	<p>We believe that Modification P190 better facilitates BSC Objectives C) and D).</p> <p>Objective C) – Promoting effective competition in the generation and supply of electricity, and promoting competition in the sale and purchase of electricity:</p> <ul style="list-style-type: none"> Removing the requirement for the CDCA to witness and seal CVA metering will reduce the costs to Parties for site visits, and revisits, and other associated costs i.e. paperwork and duplication of effort, Reduction in risk to Parties of metering systems being left unsealed if the CDCA are required to return to site. <p>Objective D) – Promoting efficiency in the implementation and administration of the balancing and settlement arrangements:</p> <ul style="list-style-type: none"> Reduction in central costs by removing the requirement for the CDCA to provide a witnessing and sealing service.

Q	Question	Response	Rationale
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	We believe that this would be a comprehensive solution following the adoption of our comments in Q(7) relating to the use of existing sealing equipment from the SVA market.
3.	Should Meter Operator Agents, who were directly or indirectly affiliated with the Registrant of the Metering Systems' company, be allowed to carry out witnessing and sealing work on that Metering System (bearing in mind they will still be subject to Technical Assurance visits)? Please give rationale	Yes	SP believe that this will provide a more cost effective process. SP concurs with the suggestions in the consultation document that the proposed new process would not lead to an increase in fraudulent activity or that it would detrimentally impact the quality of sealing work, as the current process did not appear to have significant influence in this area. In addition this will harmonise the CVA sealing arrangements with the SVA sealing arrangements.
4.	Do agree with the Group's suggestion that the requirements and processes for sealing should be based on the Meter Operators Code of Practice Agreement? Please give rationale	Yes	We feel that this is a sensible approach to ensure that a universal standard is applied to the sealing process. SP would not like to see unnecessarily onerous obligations being placed on MOps through a MCoP agreement.
5.	Do agree with the Group's suggestion that ELEXON should hold a copy of the sealing pliers register as detailed in section 2.3 of the consultation document? Please give rationale	Yes	This provides for the necessary data to be available to the industry and provides sufficient transparency of data with regards to TAA audit requirements.
6.	Do you think that using 3 rd party contractors raises any issues that need to be considered by the P190 Modification Group as detailed in section 2.3 of the consultation document? Please give rationale	No	The roles and obligations with regards to Metering Systems are sufficiently detailed in the BSC and subsidiary documents and if any of these obligations are contracted to a 3 rd party contractor then the bi-lateral commercial arrangements should be robust enough to manage these.
7.	Does P190 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	Yes	Further savings and greater efficiency can be achieved, by utilising the existing sealing equipment from the SVA market (where appropriate) thereby saving on the purchasing of new or specific pliers for use in the CVA market. The existing control of sealing pliers and dies within the SVA market can be used as a basis for the introduction to the CVA market; all sealing pliers and dies are unique to each company and Field Engineer. This will harmonise the CVA sealing arrangements with the SVA sealing arrangements

Q	Question	Response	Rationale
8.	Are there any further comments on P190 that you wish to make?	No	

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P190 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS – CVA WITNESSING & SEALING

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>Martin Mate</i>
No. of Parties Represented	<i>5</i>
Parties Represented	<i>British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, Eggborough Power Ltd, British Energy Generation (UK) Ltd, British Energy Direct Ltd</i>
No. of Non Parties Represented	<i>-</i>
Non Parties represented	<i>-</i>
Role of Respondent	<i>Supplier/Generator/Trader/Consolidator/Exemptable Generator/Party Agent</i>

Q	Question	Response	Rationale
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Q	Question	Response	Rationale
1.	<p>Do you believe Proposed Modification P190 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)</p>	No	<p>The independent sealing and witnessing service provides a level of assurance of metering and data integrity. Most CVA meters measure much larger quantities of energy than most SVA meters, and meter integrity and data quality for CVA meters has generally been very good. SVA meter operation does not deliver the same level of meter integrity or data quality and should not be held up as an example to be followed. A single serious incident of CVA meter ‘abuse’ could more than exceed a number of years worth of potential savings in assurance measures.</p> <p>The main defect identified by the proposal appears to be failure of the existing witness/sealing service to meet business requirements, either because of service delivery failure or inadequately specified service description. Removal of the independent assurance does not seem an appropriate solution.</p> <p>The changes required to the code, procedures, CoPs and other subsidiary documents will incur considerable (unspecified by assessment) central and participant costs. We believe this money would be better spent improving the service rather than removing it.</p> <p>The efficiency savings for individual parties are claimed to arise from not having to plan and arrange witness visits in advance and not having to wait on rare occasions when the sealing/witness does not keep appointments. However, we consider these savings to be very minor in comparison to the cost of implementing the changes.</p> <p>The potential cost saving if the CDCA service were to be removed is not identified. In the absence of any form of menu of costs for services provided by the central service agents, we have no assurance that any cost savings by CDCA will be passed to parties.</p>

Q	Question	Response	Rationale
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	Possibly	<p>1. The current operational problems and inefficiencies identified by the proposal appear to result from either an inadequately specified or poorly delivered service by the CDCA. Appropriate incentives should be in place to ensure delivery of the service. If the service is not delivering the business requirement, it should be reviewed.</p> <p>2. Removal of the current independent sealing and witnessing service would only be justified if assurance were obtained by other means, for example by an increase in the level of independent inspection of CVA boundary points and metering installations.</p>
3.	Should Meter Operator Agents, who were directly or indirectly affiliated with the Registrant of the Metering Systems' company, be allowed to carry out witnessing and sealing work on that Metering System (bearing in mind they will still be subject to Technical Assurance visits)? Please give rationale	No	<p>We are not convinced that Technical Assurance visits of Meter Operators will provide the same level of assurance of individual meter installations as the existing sealing and witnessing service.</p> <p>Most Meter Operator Agents are affiliated in some way to registrants.</p>
4.	Do agree with the Group's suggestion that the requirements and processes for sealing should be based on the Meter Operators Code of Practice Agreement? Please give rationale	No	<p>We see no benefit in another agreement. The requirements can be contained within the BSC.</p>
5.	Do agree with the Group's suggestion that ELEXON should hold a copy of the sealing pliers register as detailed in section 2.3 of the consultation document? Please give rationale	Yes	<p>If this proposal were to be approved, the option that Elexon manage a register of sealing pliers seems simplest and hopefully most efficient and cost effective.</p>
6.	Do you think that using 3 rd party contractors raises any issues that need to be considered by the P190 Modification Group as detailed in section 2.3 of the consultation document? Please give rationale	Yes	<p>3rd party contractors may require additional payment to cover their work and risks associated with performing a sealing and witnessing service, and CVA MOAs using them will have have additional administrative work. This should be considered in establishing costs and benefits.</p>

Q	Question	Response	Rationale
7.	Does P190 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	Yes / No	See discussion of possible alternatives above.
8.	Are there any further comments on P190 that you wish to make?	Yes / No	Not at this time.

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Respondent:	<i>Andrew Colley</i>
No. of Parties Represented	<i>6</i>
Parties Represented	<i>SSE Energy Supply Ltd, SSE Generation Ltd, Keadby Generation Ltd, Medway Power Ltd, Southern Electric Power Distribution plc, Scottish Hydro-Electric Power Distribution Ltd</i>
No. of Non Parties Represented	<i>1</i>
Non Parties represented	<i>SSE Meter Operator</i>
Role of Respondent	<i>Supplier/Generator/Trader/ LDSO/ Party Agent</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you believe Proposed Modification P190 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	SSE believe that the modification will better achieve applicable objectives (c) and (d) for the reasons stated in Section 3 Initial Conclusions part of the consultation document. SSE welcome a move to harmonise sealing procedures across CVA and SVA arrangements and believe that this will promote long-term efficiency and cost saving.
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	The change in responsibility is quite objective and there seems little alternative than to give the responsibility to those maintaining the Metering System or to contract to a 3 rd Party. It is hard to conceive that any alternatives, such as appoint 3 rd Parties other than the CDCA but with a stronger local manpower presence, could represent a viable alternative to the current situation and achieve the applicable objectives.

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3.	Should Meter Operator Agents, who were directly or indirectly affiliated with the Registrant of the Metering Systems' company, be allowed to carry out witnessing and sealing work on that Metering System (bearing in mind they will still be subject to Technical Assurance visits)? Please give rationale	Yes	<p>Whilst SSE recognise that there is a risk that this circumstance could be exploited to manipulate the configuration of the metering system to a particular Party's advantage, we consider that the probability of the risk materialising is low. Our view is that there is no evidence to suggest that such manipulation is occurring within the SVA arrangements where MOA sealing is the standard. Additionally the constraints of general law would suggest it highly unlikely that Registrants would take the risk of exposing themselves to the consequences of committing an act of fraud, were they to knowingly take such action and be discovered. Particularly given that all CVA sites are subject to random Technical Assurance audit.</p> <p>There may be some merit however in reviewing the strategy for targeting of CVA sites for TAA audit to ensure that an optimum balance is struck between Generator, Distribution and Supplier Registrants (e.g. there may be a need to target more Generation sites).</p>
4.	Do agree with the Group's suggestion that the requirements and processes for sealing should be based on the Meter Operators Code of Practice Agreement? Please give rationale	Yes	We agree that adopting the requirements and processes set out within the MOCOPA without forcing small MOAs to sign up to the MOCOPA provides a pragmatic and acceptable way forward.
5.	Do agree with the Group's suggestion that ELEXON should hold a copy of the sealing pliers register as detailed in section 2.3 of the consultation document? Please give rationale	Yes	In any circumstance BSCCo would need details of authorised Sealing Pliers to correctly conduct a technical audit, so it seems sensible for BSCCo to act as a central custodian of these records, with the proviso that the administrative process must be kept simple and free of unnecessary bureaucracy.

Q	Question	Response Error! Bookmark not defined.	Rationale
6.	Do you think that using 3 rd party contractors raises any issues that need to be considered by the P190 Modification Group as detailed in section 2.3 of the consultation document? Please give rationale	No	The responsibility will be the MOAs to ensure that approved Sealing Pliers are utilised, regardless of any subsequent contractual arrangements. It will be a matter for MOAs to ensure appropriate controls are exercised to comply with this responsibility when placing business with 3 rd Party contractors.
7.	Does P190 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	Yes	<p>The current timescales do allow some time for CDCA to interact with the Registrant to ensure that all necessary changes are authorised should the work conducted by a MOA impact the Registration or Aggregation Rules in any way. There is a risk that erosion of timescales could leave the Registrant with insufficient notice in certain circumstances to fulfil any consequential action.</p> <p>Whilst a reduction in timescales and bureaucracy is welcomed in the wider context, the proposal is not explicit enough on how we can ensure that the MOA communicates directly with Registrant within a timescale that is sensible enough to allow consequential registration actions to be taken should they be required.</p>
8.	Are there any further comments on P190 that you wish to make?	No	

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Respondent:	<i>Dave Brown</i>
No. of Parties Represented	
Parties Represented	
No. of Non Parties Represented	<i>1</i>
Non Parties represented	<i>Metering Services (HHMOA)</i>
Role of Respondent	<i>Half Hourly Meter Operator</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you believe Proposed Modification P190 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
3.	Should Meter Operator Agents, who were directly or indirectly affiliated with the Registrant of the Metering Systems' company, be allowed to carry out witnessing and sealing work on that Metering System (bearing in mind they will still be subject to Technical Assurance visits)? Please give rationale	Yes	In SVA this already happens and the MOAs accreditation is such that it will have robust systems in place to achieve this proposal.

Q	Question	Response Error! Bookmark not defined.	Rationale
4.	Do agree with the Group's suggestion that the requirements and processes for sealing should be based on the Meter Operators Code of Practice Agreement? Please give rationale	Yes	
5.	Do agree with the Group's suggestion that ELEXON should hold a copy of the sealing pliers register as detailed in section 2.3 of the consultation document? Please give rationale	Yes	This gives an extra level of accountability assuming the process of communication is robust.
6.	Do you think that using 3 rd party contractors raises any issues that need to be considered by the P190 Modification Group as detailed in section 2.3 of the consultation document? Please give rationale	Yes / No	
7.	Does P190 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
8.	Are there any further comments on P190 that you wish to make?	No	

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by 12:00 on 12 August 2005 to modification.consultations@elexon.co.uk and please entitle your email **P190 Assessment 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 Mike Smith on 020 7380 4033, email address mike.smith@elexon.co.uk.