

## Responses from P184 Assessment Consultation

Consultation Issued 08 March 2005

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	E.ON UK	P184_AR_001	15	0
2.	IMServ	P184_AR_002	0	1
3.	EDF Energy	P184_AR_003	9	0
4.	British Gas Trading	P184_AR_004	1	0
5.	Scottish Power	P184_AR_005	6	0
6.	Npower	P184_AR_006	10	0

## P184 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.

<b>Respondent:</b>	E.ON UK
<b>No. of Parties Represented</b>	15
<b>Parties Represented</b>	E.ON UK plc, Powergen Retail Limited, Cottam Development Centre Limited, Enizade Ltd, E.ON UK Drakelow Limited, E.ON UK Ironbridge Limited, E.ON UK High Marnham Limited, Midlands Gas Limited, Western Gas Limited, TXU Europe (AHG) Limited, TXU Europe (AH Online) Limited, Citigen (London) Limited, Severn Trent Energy Limited (known as TXU Europe (AHST) Limited), TXU Europe (AHGD) Limited and Ownlabel Energy.
<b>No. of Non Parties Represented</b>	-
<b>Non Parties represented</b>	-
<b>Role of Respondent</b>	Supplier, Generator, Trader, Consolidator & Exemptable Generator

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you believe that Proposed Modification P184 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	
2.	Do you agree with the method of clarification proposed by the Modification Group described in the consultation document? Please give rationale	Yes	
3.	Do you agree that the legal text provides adequate clarification of the issues highlighted in the consultation document?	Yes	

Q	Question	Response Error! Bookmark not defined.	Rationale
4.	Does P184 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	Whilst we support the proposed modification we note that the assessment report does not consider whether any potential benefits exist from clarifying the intention as being that of the alternative interpretation i.e. that a Settlement error is considered to exist upon the entire Trading Query and as a result an entire Query may be void if just one of the Settlements is outside of that deadline. Arguably this could better incentivise Parties to submit timely and accurate Trading Queries. However, we note that in reality, the rejection of an entire Query due to the circumstance described above is only likely to result in the resubmission of a new Query excluding the ineligible Settlement Period. This would introduce an inefficient process and potentially negate the benefits. Therefore on balance we concur with the Modification Group's clarification.

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 **5pm on Friday 18 March 2005** to [modification.consultations@exxon.co.uk](mailto:modification.consultations@exxon.co.uk) and please entitle your email 'P184 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 David White on 020 7380 4374, e-mail address [david.white@exxon.co.uk](mailto:david.white@exxon.co.uk).

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<b>Respondent:</b>	<i>Nick White</i>
<b>No. of Parties Represented</b>	
<b>Parties Represented</b>	<i>IMServ Europe</i>
<b>No. of Non Parties Represented</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Party Agent</i>

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you believe that Proposed Modification P184 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	
2.	Do you agree with the method of clarification proposed by the Modification Group described in the consultation document? Please give rationale	Yes	
3.	Do you agree that the legal text provides adequate clarification of the issues highlighted in the consultation document?	Yes	
4.	Does P184 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	

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

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you believe that Proposed Modification P184 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	We consider that P184 better facilitates BSC Applicable Objective (d) – Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.
2.	Do you agree with the method of clarification proposed by the Modification Group described in the consultation document? Please give rationale	Yes	
3.	Do you agree that the legal text provides adequate clarification of the issues highlighted in the consultation document?	Yes	

Q	Question	Response Error! Bookmark not defined.	Rationale
4.	Does P184 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	

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<b>Respondent:</b>	Mark Manley
<b>No. of Parties Represented</b>	
<b>Parties Represented</b>	British Gas Trading (BGT)
<b>No. of Non Parties Represented</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you believe that Proposed Modification P184 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	BGT believe that this will better facilitate Applicable BSC Objective (d) as it will provide greater clarity in a number of areas and therefore improve the efficiency in the implementation and administration of the balancing and settlement arrangements.
2.	Do you agree with the method of clarification proposed by the Modification Group described in the consultation document? Please give rationale	Yes	BGT agrees with the proposed method of clarification.
3.	Do you agree that the legal text provides adequate clarification of the issues highlighted in the consultation document?		
4.	Does P184 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	



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<b>Respondent:</b>	<i>Timothy Roberts (Scottish Power)</i>		
<b>No. of Parties Represented</b>	<i>6</i>		
<b>Parties Represented</b>	<i>Scottish Power UK PLC; Scottish Power Energy Management Ltd; Scottish Power Generation Ltd; Scottish Power Energy Retail Ltd; SP Transmission Ltd; SP Manweb PLC.</i>		
<b>No. of Non Parties Represented</b>	<i>0</i>		
<b>Non Parties represented</b>			
<b>Role of Respondent</b>	<i>Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent /</i>		
<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you believe that Proposed Modification P184 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	<i>Yes</i>	<i>This Modification will remove the ambiguities between Section W of the BSC and BSCP11, in particular it clarifies the duration of a settlement error and the definition of the query deadline in relation to a settlement period. As a result, Scottish Power believes that this Modification better facilitates the achievement of BSC Objective D i.e. ‘To promote the efficiency in the implementation and administration of the balancing and settlement arrangements.</i>
2.	Do you agree with the method of clarification proposed by the Modification Group described in the consultation document? Please give rationale	<i>Yes</i>	<i>As stated above, this Modification clarifies the duration of a settlement error and the definition of the query deadline in relation to a settlement period. In addition it clarifies the roles of the BSCCo and the TDC in the determination of the Trading Queries &amp; Disputes. Consequently, SP supports this clarification.</i>
3.	Do you agree that the legal text provides adequate clarification of the issues highlighted in the consultation document?	<i>Yes</i>	

4.	Does P184 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	It is a "no" but with a small caveat - there remains an issue regarding the lack of clarity regarding the provision of a Trading Query end date under BSCP11, which was raised at the recent SVA Forum. Although, ELEXON have stated that a CP is to be raised, are there any issues that this Mod should pick up in relation to the BSC?
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<b>Respondent:</b>	<i>Louisa Gilchrist</i>
<b>No. of Parties Represented</b>	<i>10</i>
<b>Parties Represented</b>	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
<b>No. of Non Parties Represented</b>	<i>N/a</i>
<b>Non Parties represented</b>	<i>N/a</i>
<b>Role of Respondent</b>	<i>Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent<sup>1)</sup></i>

<b>Q</b>	<b>Question</b>	<b>Response <sup>1</sup></b>	<b>Rationale</b>
1.	Do you believe that Proposed Modification P184 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	We believe that Proposed Modification better facilitates the achievement of BSC Objective (d) “promoting efficiency in the implementation and administration of the balancing and settlement agreement” as it clarifies the duration of a settlement error and the process followed when only part of the Trading Query is raised within the Query Deadline. However, the impact of the successive Modifications on the duration of the Query deadline may have some unintended consequences, specifically it reduces the scope of Parties to raise Queries that arise from root causes outside the Query deadline.
2.	Do you agree with the method of clarification proposed by the Modification Group described in the consultation document? Please give rationale	Yes	The method of clarification outlined in the consultation document is acceptable to Npower, notwithstanding the comments raised in the answer to question 1.
3.	Do you agree that the legal text provides adequate clarification of the issues highlighted in the consultation document?	Yes	The legal text is acceptable

<sup>1</sup> Delete as appropriate – please do not use knockout, this is to make it easier to analyse the responses

Q	Question	Response <sup>1</sup>	Rationale
4.	Does P184 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 note that the shortening of the timescales for raising Trading Queries implemented through Modification P131 needed clarification, and the Proposed Modification P184 provides greater clarity. However we believe that timescales put in place since Modification P131 may now be too short in some circumstances. By excluding some Queries the Proposed Modification may not contribute to lowering the volume of settlement errors. Taking into account issues such as void and vacant sites, current timescale restrictions may prove too tight to identify the root causes of Queries.

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