

## Responses from P185 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	P185_AR_001	15	0
2.	IMServ	P185_AR_002	0	1
3.	EDF Energy	P185_AR_003	9	0
4.	British Gas Trading	P185_AR_004	1	0
5.	Scottish Power	P185_AR_005	6	0
6.	Npower	P185_AR_006	10	0

## P185 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 P185 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 P185 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	

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@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P185 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@elexon.co.uk](mailto:david.white@elexon.co.uk).

## P185 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>	<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>	Party Agent

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you believe that Proposed Modification P185 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 P185 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	

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@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P185 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@elexon.co.uk](mailto:david.white@elexon.co.uk).

## P185 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>	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 P185 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 P185 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	

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@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P185 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@elexon.co.uk](mailto:david.white@elexon.co.uk).

## P185 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>	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 P185 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 P185 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	

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@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P185 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@elexon.co.uk](mailto:david.white@elexon.co.uk).

## P185 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>	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 P185 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 concur with the method of clarification, as it sets out the options available following the resolution of a Trading Dispute.
3.	Do you agree that the legal text provides adequate clarification of the issues highlighted in the consultation document?	Yes	
4.	Does P185 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	

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@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P185 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@elexon.co.uk](mailto:david.white@elexon.co.uk).

## P185 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>	<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 P185 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	As the BSC currently lacks conciseness in this area, Scottish Power support and agree with the principles of this Modification, in that it clarifies the ESD & Initial Settlement correction process as well as making it clear the options available to the TDC following the resolution of a Trading Dispute within the BSC. 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.’
2.	Do you agree with the method of clarification proposed by the Modification Group described in the consultation document? Please give rationale	Yes	Scottish Power support the proposal to amend the BSC to provide the clarity the above issues require.
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 P185 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	

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@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P185 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@elexon.co.uk](mailto:david.white@elexon.co.uk).

## P185 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>	<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</i>

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you believe that Proposed Modification P185 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	We believe that Proposed Modification P185 better facilitates the achievement of Applicable Objective (d) “Promoting efficiency in the implementation and administration of the balancing and settlement code” as it clarifies the perceived ambiguity regarding the processes following and ESD being performed between settlement runs, and the options available to the TDC following the resolution of Trading Disputes.
2.	Do you agree with the method of clarification proposed by the Modification Group described in the consultation document? Please give rationale	Yes	We agree with the method of clarification
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

Q	Question	Response Error! Bookmark not defined.	Rationale
4.	Does P185 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	Qualified No	We would like to understand the rationale as to why the issues surrounding Proposed Modification P184 and Proposed Modification P185 were split in two in the first place, and how now, in the legal drafting, it is sufficient for them to be considered together.

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@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P185 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@elexon.co.uk](mailto:david.white@elexon.co.uk).