

Responses from P179 Draft Modification Report Consultation

Consultation Issued 19 November 2004

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	E.ON UK	P179_dMR_001	15	0
2.	Scottish and Southern	P179_dMR_002	5	0
3.	BGT	P179_dMR_003	1	0
4.	Central Networks	P179_dMR_004	1	0
5.	RWE Npower	P179_dMR_005	10	0

P179 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:	Geoff Allen
No. of Parties Represented	15
Parties Represented	E.ON UK plc; Powergen Retail Ltd; Citigen (London) Ltd; Cottam Development Centre Ltd; Enizade Ltd; E.ON UK Drakelow Ltd; E.ON UK High Marnham Ltd; E.ON UK Ironbridge Ltd; Midlands Gas Ltd; Ownlabel Energy Ltd; Severn Trent Energy Ltd; TXU Europe (AHG) Ltd; TXU Europe (AHGD) Ltd; TXU Europe (AH Online) Ltd; Western Gas Ltd
No. of Non Parties Represented	0
Non Parties represented	
Role of Respondent	Supplier / Generator / Trader / Exemptable Generator

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P179 and the provisional recommendation to the Authority contained in the draft Modification Report that P179 should be made? Please give rationale.	Yes	We consider the changes identified conform the those defined under Section F2.1.1(d)(iv) of the BSC, are reasonable, and should therefore 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	The proposed legal text appears to satisfactorily address the issues identified.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P179? Please give rationale.	Yes	The proposed implementation dates appear sensible.
4.	Are there any further comments on P179 that you wish to make?	No	

Please send your responses by **17:00 on Friday 26 November 2004** to modification.consultations@elexon.co.uk and please entitle your email '**P179 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.

P179 _dMR_002.txt

From: Garth Graham
Sent: 26 November 2004 08:55
To: Modification Consultations
Subject: P179 Report Consultation

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 19th November 2004, and the associated Consultation for P179, we have the following comments to make:-

Q1 Do you agree with the Panel's views on P179 and the provisional recommendation to the Authority contained in the draft Modification Report that P179 should be made? Please give rationale.

Yes, we agree with the proposed BSC Panel recommendation to the Authority that Modification Proposal P179 should be made for the reasons outlined in the Modification Report. We believe that P179 will better facilitate the achievement of the Applicable BSC Objectives and it should therefore be approved.

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 P179? Please give rationale.

If the Modification Proposal P179 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 P179 that you wish to make?

Nothing further at this time.

Regards

Garth Graham
Scottish and Southern plc

ELEXON Limited
4th Floor
350 Euston Road
London
NW1 3AW

Our Ref.
Your Ref.
26 November 2004

Dear Sirs,

Re: Modification Proposal P179 – Housekeeping Modification

Thank you for the opportunity of responding to this draft modification report considering Modification Proposal P179. British Gas Trading (BGT) agrees with the Panel's provisional recommendation that the Modification Proposal will better facilitate Applicable BSC Objective (d).

BGT has some issues with the proposed legal drafting that has been provided. BGT has identified a typographical error in Section K3.4.2A of the proposed legal text. The text states "increases in the ~~of the~~ negative value of", the words that are struck out need to be removed. BGT also questions the change proposed under Section W4.2.1. BGT believe it is appropriate that the wording should remain as 'shall' rather than being changed to 'may'. BGT understands that the actions detailed in Section W 4.2.1 require Panel approval, so the Trading Disputes Committee (TDC) would be obligated rather than having the choice to recommend rectification via one of these routes. BGT also questions whether this change falls within the scope of a housekeeping change as it appears to be changing the options available to the TDC rather than amending an inconsistency or manifest error.

BGT agree with the proposed implementation date.

If you have any questions regarding this response please contact me 01753 431137.

Yours faithfully

Mark Manley
Contract Manager

P179_dMR_004.txt

P179 draft Modification Report Consultation (Deadline for responses - 17:00 on 26/11/04) From: Sue Pritchard
Sent: 26 November 2004 16:44
To: Modification Consultations
Subject: RE: P179 draft Modification Report Consultation (Deadline for responses - 17:00 on 26/11/04)

Central Networks would like to return the response of 'No Comment' to the P179 draft Modification Report Consultation

Regards
Simon Sturgess

Registration Services
Central Networks

P179 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:	<i>Name</i> John Stewart
No. of Parties Represented	10
Parties Represented	<i>Please list all Parties responding on behalf of (including the respondent company if relevant).).</i> RWE Trading GmbH; RWE Npower Ltd; Npower cogen Ltd; Npower cogen 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	
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 state¹)</i>

Q	Question	Response¹	Rationale
1.	Do you agree with the Panel's views on P179 and the provisional recommendation to the Authority contained in the draft Modification Report that P179 should be made? Please give rationale.	No	The nature of most of the proposed changes is to change the Code to rectify errors. However, the changes to section W have the effect of changing the meaning of the Code.
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.	No	Although most of the changes will rectify errors to the Code, change 22 does not rectify the perceived error in W4.2.1 of the code highlighted in the original Modification Proposal. Replacing ' shall recommend' with ' may recommend' still does not put it right. Change 22 should be withdrawn from the modification and treated as a modification in it's own right.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P179? Please give rationale.	Yes	There is no obvious need to delay implementation

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

Q	Question	Response ¹	Rationale
4.	Are there any further comments on P179 that you wish to make?	Yes	We disagree with the removal of change 21 from the modification. The TDC or Panel needs to determine whether there was a settlement error and the materiality is greater than the threshold (4.1.1A) they have to do one of 3 things ie a, b or c to correct the settlement error, therefore 4.1.1 should read ' shall determine' not ' may determine'.

Please send your responses by **17:00 on Friday 26 November 2004** to modification.consultations@elexon.co.uk and please entitle your email '**P179 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.