

Responses from P169 Assessment Consultation

Consultation Issued 15/09/04

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	E.ON UK	P169_AR_001	15	0
2.	EnAppSys Ltd	P169_AR_002	0	1
3.	Scottish and Southern	P169_AR_003	5	0
4.	Central Networks	P169_AR_004	1	0
5.	British Energy	P169_AR_005	4	0
6.	EDF Energy	P169_AR_006	9	0
7.	Iberdrola	P169_AR_007	1	0
8.	RWE Npower	P169_AR_008	10	0
9.	British Gas	P169_AR_009	1	0
10.	SmartestEnergy	P169_AR_010	1	0

P169 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:	<i>E.ON UK plc</i>
No. of Parties Represented	<i>15</i>
Parties Represented	<i>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</i>
No. of Non Parties Represented	<i>0</i>
Non Parties represented	<i>0</i>
Role of Respondent	<i>Supplier, Generator, Trader, Consolidator, Exemptable Generator and Party Agent</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you believe that the Proposed Modification P169 (publication of BM Unit names) would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	Yes	We believe that proposed modification P169 would increase the amount of information available to participants and thereby improve transparency. We therefore agree with the provisional thoughts of the modification group that P169 would better facilitate applicable objective (c)... 'Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity.

Q	Question	Response Error! Bookmark not defined.	Rationale
2.	Do you believe that the potential Alternative Modification P169 (publication of all BM Unit registration data contained in the CRA-I020 flow), when compared with the Proposed Modification, would better facilitate the achievement of the Applicable BSC Objectives in relation to the defect identified by the Modification Proposal? <i>Please give rationale and state objective(s)</i>	Yes	Alternative modification P169 would increase the amount of information available to participants compared to the proposed modification. For this reason we believe that transparency will be enhanced and the applicable objectives better facilitated. Potential P169 Alternative could also avoid the costs of future modifications aimed at releasing further information from the CRA-I020 flow. As a result, the Alternative proposal could also promote efficiency in the implementation and administration of the balancing and settlement arrangements.
3.	Do you support the Modification Group's approach to the format and frequency of publication under the Proposed and potential Alternative Modifications? <i>Please give rationale</i>	Yes	
4.	Would your organisation use the data which would be published under the Proposed and potential Alternative Modifications? <i>Please give rationale, including the activities in which such data would be used</i>	Yes	Market analysis.
5.	Do you believe that non-publication of this data represents a barrier to participation in the market? <i>Please give rationale</i>	No	We would categorise this data as being useful rather than essential. As such we would not consider the non-publication of this data to represent a barrier to participation in the market.
6.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	No	
7.	Are there any further comments on P169 that you wish to make?	No	

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Please send your responses by **17:00 on Wednesday 15 September 2004** to modification.consultations@elexon.co.uk and please entitle your email '**P169 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 Kathryn Coffin (lead analyst) on 020 7380 4030, email address kathryn.coffin@elexon.co.uk.

P169 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

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Respondent:	<i>EnAppSys Ltd</i>
No. of Parties Represented	<i>0</i>
Parties Represented	<i>0</i>
No. of Non Parties Represented	<i>1</i>
Non Parties represented	<i>EnAppSys Ltd</i>
Role of Respondent	<i>Licensed Data Provider Under Modification P114</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you believe that the Proposed Modification P169 (publication of BM Unit names) would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	YES	It would improve market transparency by attaching names to BM Unit IDs (aiding BSC Objective C). This would make it easier to allow users of data to understand which physical plant the data refers to. Currently there is a barrier to entry into the market because existing players have an idea of which physical bit of kit a BM Unit ID refers to, whereas new entrants are less likely to.

Q	Question	Response Error! Bookmark not defined.	Rationale
2.	Do you believe that the potential Alternative Modification P169 (publication of all BM Unit registration data contained in the CRA-I020 flow), when compared with the Proposed Modification, would better facilitate the achievement of the Applicable BSC Objectives in relation to the defect identified by the Modification Proposal? <i>Please give rationale and state objective(s)</i>	YES	<p>The "potential Alternative Modification" increases the amount of BM Unit information available. It would further improve market transparency (aiding BSC Objective C). Almost all the information the "potential Alternative Modification" proposes to release currently is published elsewhere or is derivable from other data. By pulling it all together in one place, the work required to get this information is reduced, improving market transparency.</p> <p>The amount of work required at Elexon to publish all BM Unit data would not be significantly more than the cost of implementing P168 & P169 so there is no cost barrier to implementing the "potential Alternative Modification".</p> <p>The "potential Alternative Modification" should be implemented in preference to the "Proposed Modification".</p>
3.	Do you support the Modification Group's approach to the format and frequency of publication under the Proposed and potential Alternative Modifications? <i>Please give rationale</i>	YES	A simple comma separated file which is published weekly is sufficient for general publication.
4.	Would your organisation use the data which would be published under the Proposed and potential Alternative Modifications? <i>Please give rationale, including the activities in which such data would be used</i>	YES	EnAppSys Ltd publishes metering and settlement data to BSC Parties and licensed data users under P114. The data released under the "Proposed" and (more importantly) "potential Alternative Modifications" would be useful to aid analysis of this metering and settlement data to further improve understanding of the operation of the market.
5.	Do you believe that non-publication of this data represents a barrier to participation in the market? <i>Please give rationale</i>	YES	Current participants have accumulated knowledge on the operation of the market, new entrants are less likely to. By publishing more data on the operation of the market this helps to level the playing field between existing and new market participants. If the data is not published there is a barrier to participation in the market for people and organisations which do not have this accumulated knowledge.

Q	Question	Response Error! Bookmark not defined.	Rationale
6.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	NO	
7.	Are there any further comments on P169 that you wish to make?	YES	<p>The initial written assessment suggested that the CRA-I020 flow should be published. This followed work done for the ISG (ISG Paper 33/370). Whilst the publication of this flow could not be put forward in the scope of this modification because it referred purely to BM Unit data, EnAppSys Ltd would like to have this flow published to BSC Parties and Licensed data users under P114.</p> <p>Finally a dry technical matter on the "potential Alternative Modification" ... there is no need to publish the "effective to date" as this will always be blank because the modification proposes to continue the existing practice which is only to publish currently registered BM Units which by their nature will have no "effective to date".</p>

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Dear Sirs,

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

In relation to the seven questions listed in the Assessment Consultation document, contained within your note of 20th August 2004 concerning Modification Proposals P169, we have the following comments to make:-

Q1 Do you believe that the Proposed Modification P169 (publication of BM Unit names) would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)

Yes, we believe that Original Modification Proposal P169 will better facilitate the achievement of the applicable BSC Objectives for the reasons outlined in the first two substantive paragraphs of section 3.1 of the Assessment Consultation document.

Q2 Do you believe that the potential Alternative Modification P169 (publication of all BM Unit registration data contained in the CRA-I020 flow), when compared with the Proposed Modification, would better facilitate the achievement of the Applicable BSC Objectives in relation to the defect identified by the Modification Proposal? Please give rationale and state objective(s)

Yes, we believe that Alternative Modification Proposal P169 will better facilitate the achievement of the applicable BSC Objectives for the reasons outlined in the first two substantive paragraphs of section 3.2 of the Assessment Consultation document.

Q3 Do you support the Modification Group's approach to the format and frequency of publication under the Proposed and potential Alternative Modifications? Please give rationale

Yes. Publication within the existing 'Registered BMU' spreadsheet on the BSC Website and updated weekly is appropriate.

Q4 Would your organisation use the data which would be published under the Proposed and potential Alternative Modifications? Please give rationale, including the activities in which such data would be used

Yes, we believe we would use this data potentially for a variety of activities.

Q5 Do you believe that non-publication of this data represents a barrier to participation in the market? Please give rationale

No. We do not agree with the premise outlined in the third substantive paragraphs of section 3.1 of the Assessment Consultation document. Information is publically available and can be subjected to analysis by parties (large and small), consultants, trade publications etc., etc. New entrants etc., in seeking to become a market participant can obtain advice from consultants etc., on what information they need to take cognisance of. We do not agree with the premise that new entrants should be provided with such analysis (that other parties, large and small, have had to pay to undertake) for free.

Q6 Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? Please give rationale

None at this time.

Q7 Are there any further comments on P169 that you wish to make?

None at this time.

Regards

Garth Graham
Scottish and Southern Energy plc

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Good afternoon,

Central Networks would like to return a response of 'No Comment' to the P0169 Assessment Consultation

Regards

Julie Turner

P169 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:	<i>Rachel Lockley</i>
No. of Parties Represented	<i>4</i>
Parties Represented	<i>British Energy Generation Ltd; British Energy Generation (UK) Ltd, Eggborough Power Ltd; Power and Energy Trading Ltd</i>
No. of Non Parties Represented	<i>0</i>
Non Parties represented	
Role of Respondent	<i>Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you believe that the Proposed Modification P169 (publication of BM Unit names) would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	No	We do not believe that this modification will better facilitate the BSC objectives. BE cannot see what use companies will have for the information and as such use has not been highlighted in the consultation document, we therefore believe that this modification is an unnecessary expenditure.
2.	Do you believe that the potential Alternative Modification P169 (publication of all BM Unit registration data contained in the CRA-I020 flow), when compared with the Proposed Modification, would better facilitate the achievement of the Applicable BSC Objectives in relation to the defect identified by the Modification Proposal? <i>Please give rationale and state objective(s)</i>	No	BE do not believe that either the original or the alternative would better facilitate the BSC objectives. We do not see what use companies would have for this information.
3.	Do you support the Modification Group's approach to the format and frequency of publication under the Proposed and potential Alternative Modifications? <i>Please give rationale</i>	Yes / No	N/A

Q	Question	Response Error! Bookmark not defined.	Rationale
4.	Would your organisation use the data which would be published under the Proposed and potential Alternative Modifications? <i>Please give rationale, including the activities in which such data would be used</i>	Yes / No	At present we have no obvious use for the data.
5.	Do you believe that non-publication of this data represents a barrier to participation in the market? <i>Please give rationale</i>	No	We do not see what use companies would have for this information.
6.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	No	
7.	Are there any further comments on P169 that you wish to make?	No	

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Respondent:	<i>Paul Mott (EDF Energy)</i>
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 that the Proposed Modification P169 (publication of BM Unit names) would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	Yes	The release of this information would better facilitate achievement of Applicable BSC Objective (c), as it would promote transparency of the market and facilitate competition.
2.	Do you believe that the potential Alternative Modification P169 (publication of all BM Unit registration data contained in the CRA-I020 flow), when compared with the Proposed Modification, would better facilitate the achievement of the Applicable BSC Objectives in relation to the defect identified by the Modification Proposal? <i>Please give rationale and state objective(s)</i>	Yes	As the alternative represents increased data it the alternative potentially better facilitates achievement of Applicable BSC Objective (c) over the proposed modification.
3.	Do you support the Modification Group's approach to the format and frequency of publication under the Proposed and potential Alternative Modifications? <i>Please give rationale</i>	Yes	

Q	Question	Response	Rationale
4.	Would your organisation use the data which would be published under the Proposed and potential Alternative Modifications? <i>Please give rationale, including the activities in which such data would be used</i>	Yes	We would use the data to track CALF and BMCAIC and BMCAEC.
5.	Do you believe that non-publication of this data represents a barrier to participation in the market? <i>Please give rationale</i>	No	It's more a nice to have than an essential requirement.
6.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	No	
7.	Are there any further comments on P169 that you wish to make?	No	

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Respondent:	<i>Juan Luis Ríos</i>
No. of Parties Represented	<i>1</i>
Parties Represented	<i>Iberdrola Generación S.A.U.</i>
No. of Non Parties Represented	<i>0</i>
Non Parties represented	
Role of Respondent	Trader: BSC Party – Party Agent – Notification Agent

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you believe that the Proposed Modification P169 (publication of BM Unit names) would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	Yes	It will allow Parties to obtain easily general information from other Parties. Therefore it will enhance competition in the Wholesale Market.
2.	Do you believe that the potential Alternative Modification P169 (publication of all BM Unit registration data contained in the CRA-I020 flow), when compared with the Proposed Modification, would better facilitate the achievement of the Applicable BSC Objectives in relation to the defect identified by the Modification Proposal? <i>Please give rationale and state objective(s)</i>	Yes	Yes, as it gives more information in a unique file.
3.	Do you support the Modification Group's approach to the format and frequency of publication under the Proposed and potential Alternative Modifications? <i>Please give rationale</i>	Yes	

Q	Question	Response Error! Bookmark not defined.	Rationale
4.	Would your organisation use the data which would be published under the Proposed and potential Alternative Modifications? <i>Please give rationale, including the activities in which such data would be used</i>	Yes	We would have more information for creating our own model of the UK Wholesale Market and specially, its interaction with continental wholesale markets through the Interconnector.
5.	Do you believe that non-publication of this data represents a barrier to participation in the market? <i>Please give rationale</i>	Yes	As a general rule, the more public information, the more competitive the market would be, and the less barriers to new entrants would remain
6.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	No	
7.	Are there any further comments on P169 that you wish to make?	No	

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Please send your responses by **17:00 on Wednesday 8 September 2004** to modification.consultations@exxon.co.uk and please entitle your email '**P169 Assessment Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

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Respondent:	<i>Carl Wilkes</i>
No. of Parties Represented	<i>10</i>
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	
Non Parties represented	
Role of Respondent	<i>Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you believe that the Proposed Modification P169 (publication of BM Unit names) would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	Yes	This proposal would better facilitate applicable BSC Objective C.
2.	Do you believe that the potential Alternative Modification P169 (publication of all BM Unit registration data contained in the CRA-I020 flow), when compared with the Proposed Modification, would better facilitate the achievement of the Applicable BSC Objectives in relation to the defect identified by the Modification Proposal? <i>Please give rationale and state objective(s)</i>	Yes	Yes on balance, although cost/benefit considerations must be taken into account.
3.	Do you support the Modification Group's approach to the format and frequency of publication under the Proposed and potential Alternative Modifications? <i>Please give rationale</i>	Yes	A weekly update would be acceptable.

Q	Question	Response Error! Bookmark not defined.	Rationale
4.	Would your organisation use the data which would be published under the Proposed and potential Alternative Modifications? <i>Please give rationale, including the activities in which such data would be used</i>	Yes	Routine data verification checks.
5.	Do you believe that non-publication of this data represents a barrier to participation in the market? <i>Please give rationale</i>	N/A	Possibly, although we would note that it would be the opinion of small suppliers and potential new entrants that would count more here.
6.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	No	
7.	Are there any further comments on P169 that you wish to make?	No	

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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 that the Proposed Modification P169 (publication of BM Unit names) would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	No	BGT do not believe that the publication of BM Unit names will better facilitate achievement of the Applicable BSC Objectives.
2.	Do you believe that the potential Alternative Modification P169 (publication of all BM Unit registration data contained in the CRA-I020 flow), when compared with the Proposed Modification, would better facilitate the achievement of the Applicable BSC Objectives in relation to the defect identified by the Modification Proposal? <i>Please give rationale and state objective(s)</i>	Yes	BGT believe there is more value in publishing the subset of data contained within the CRA I020 flow. As most of the information is already published or can be derived, BGT do not believe there is any issues regarding the confidentiality of data. The information publication will improve transparency and may be used by some participants to assist their decision making process.
3.	Do you support the Modification Group's approach to the format and frequency of publication under the Proposed and potential Alternative Modifications? <i>Please give rationale</i>	Yes	BGT supports the approach developed by the modification group to publish the data on a weekly basis. This is a pragmatic solution in that it will ensure the data is accurate enough to be of value without placing too onerous an obligation on ELEXON to publish the data.

Q	Question	Response Error! Bookmark not defined.	Rationale
4.	Would your organisation use the data which would be published under the Proposed and potential Alternative Modifications? <i>Please give rationale, including the activities in which such data would be used</i>		BGT would potentially use the data that would be published via the CRA I020 flow. However we envisage the usage would be relatively infrequent.
5.	Do you believe that non-publication of this data represents a barrier to participation in the market? <i>Please give rationale</i>	No	BGT are not aware of the non-publication of the data representing a barrier to entry.
6.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	No	
7.	Are there any further comments on P169 that you wish to make?	No	

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Respondent:	<i>Robert Owens</i>
No. of Parties Represented	<i>1</i>
Parties Represented	SmartestEnergy Ltd
No. of Non Parties Represented	
Non Parties represented	
Role of Respondent	<i>Consolidator</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you believe that the Proposed Modification P169 (publication of BM Unit names) would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	Yes	Availability, and equality of access to information are important requirements of a competitive market. On this basis BSC Objective (c) would seem the most appropriate.
2.	Do you believe that the potential Alternative Modification P169 (publication of all BM Unit registration data contained in the CRA-I020 flow), when compared with the Proposed Modification, would better facilitate the achievement of the Applicable BSC Objectives in relation to the defect identified by the Modification Proposal? <i>Please give rationale and state objective(s)</i>	Yes	This would be a logical extension of the availability and equality of access to information.
3.	Do you support the Modification Group's approach to the format and frequency of publication under the Proposed and potential Alternative Modifications? <i>Please give rationale</i>	Yes	

Q	Question	Response Error! Bookmark not defined.	Rationale
4.	Would your organisation use the data which would be published under the Proposed and potential Alternative Modifications? <i>Please give rationale, including the activities in which such data would be used</i>	Yes	The information is useful for marketing modelling and also would provide an easy reference point for a Party's own information.
5.	Do you believe that non-publication of this data represents a barrier to participation in the market? <i>Please give rationale</i>	Yes	"barrier to entry" is a bit strong as it is unlikely that participants are put of by the lack of this information – it is a potential barrier to competition, however, if this information is not available equally to all parties.
6.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	No	
7.	Are there any further comments on P169 that you wish to make?	No	

Parties are encouraged to provide financial information with regards 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 **17:00 on Wednesday 8 September 2004** to modification.consultations@elexon.co.uk and please entitle your email '**P169 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 Kathryn Coffin (lead analyst) on 020 7380 4030, email address kathryn.coffin@elexon.co.uk.