

**Responses from P169 Draft Report Consultation**

**Consultation Issued 21 October 2004**

**Representations were received from the following parties**

<b>No</b>	<b>Company</b>	<b>File number</b>	<b>No BSC Parties Represented</b>	<b>No Non-Parties Represented</b>
<b>1.</b>	<b>E.ON UK</b>	<b>P169_DR_001</b>	<b>15</b>	<b>0</b>
<b>2.</b>	<b>RWE NPower</b>	<b>P169_DR_002</b>	<b>10</b>	<b>0</b>
<b>3.</b>	<b>EDF Energy</b>	<b>P169_DR_003</b>	<b>9</b>	<b>0</b>
<b>4.</b>	<b>BGT</b>	<b>P169_DR_004</b>	<b>1</b>	<b>0</b>

**P169 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.

<b>Respondent:</b>	<i>E.ON UK plc</i>
<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>	N/A
<b>Non Parties represented</b>	N/A
<b>Role of Respondent</b>	Supplier, Generator, Trader, Consolidator, Exemptable Generator and Party Agent

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that the Alternative Modification P169 <b>should</b> be made? Please give rationale.	Yes	The Alternative Modification contains a greater level of information compared to the Proposed. As a result we believe that it enhances transparency and therefore competition to a higher degree.
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that the Proposed Modification P169 <b>should not</b> be made? Please give rationale.	Yes	Whilst the Proposed Modification would better facilitate the applicable BSC objectives, we believe that the Alternative Modification is superior. (Please see above for rationale).
3.	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	
4.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P169? Please give rationale.	Yes	
5.	Are there any further comments on P169 that you wish to make?	No	

Please send your responses by **17:00** on **Thursday 28 October 2004** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email '**P169 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 Kathryn Coffin on 020 7380 4030, email address [kathryn.coffin@elexon.co.uk](mailto:kathryn.coffin@elexon.co.uk).

## P169 REPORT PHASE CONSULTATION QUESTIONS

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<b>Respondent:</b>	<i>Carl Wilkes</i>
<b>No. of Parties Represented</b>	10
<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>	
<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 agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that the Alternative Modification P169 <b>should</b> be made? Please give rationale.	Yes	We agree with the Panel's provisional recommendation to the Authority. We believe the information that the Alternative allows to be published better facilitates BSC Objectives C and D.
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that the Proposed Modification P169 <b>should not</b> be made? Please give rationale.	Yes	The Alternate better facilitates BSC Objectives C and D.
3.	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?	Yes	
4.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P169?	Yes	
5.	Are there any further comments on P169 that you wish to make?	No	

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<b>Respondent:</b>	Jim Beynon (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) EDF Energy (Cottam Power) 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	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that the Alternative Modification P169 <b>should</b> be made? Please give rationale.	Yes	EDF Energy agrees that publication of wider BM Unit registration data would promote the transparency of the market and thereby better facilitate competition (Applicable BSC Objective (c)).
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that the Proposed Modification P169 <b>should not</b> be made? Please give rationale.	Yes	
3.	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	
4.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P169? Please give rationale.	Yes	
5.	Are there any further comments on P169 that you wish to make?	No	

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**ELEXON Limited**  
**4<sup>th</sup> Floor**  
**350 Euston Road**  
**London**  
**NW1 3AW**

25 October 2004

Dear Sirs,

**Re: Modification Proposal P169 – Publication of BMU names on the ELEXON website**

Thank you for the opportunity of responding to this draft modification report considering Modification Proposal P169. British Gas Trading (BGT) agrees with the Panel's provisional recommendation that the alternative Modification should be made.

BGT notes the interaction between P168 and the Alternative modification developed as part of the solution under P169. BGT agrees with the Panel's provisional recommendation to approve P169 Alternative, as it will remove the requirement for Modification Proposal P168 to be implemented.

BGT agrees with the proposed implementation date of 10 Working Days following an Authority decision.

If you have any questions regarding this response please contact me

Yours faithfully

Mark Manley  
Contract Manager

**A *centrica* business**

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