

Responses from P154 Draft Report Consultation

Consultation issued 17/02/04

Representations were received from the following parties:

No	Company	File Number	No. BSC Parties Represented	No. Non-Parties Represented
1.	IMServ Europe Limited	P154_DR_001	1	0
2.	EDF Energy	P154_DR_002	9	0
3.	National Grid Transco	P154_DR_003	1	0
4.	RWE Trading	P154_DR_004	10	0
5.	Midlands Electricity	P154_DR_005	1	0
6.	Scottish Power	P154_DR_006	6	0
7.	Western Power Distribution	P154_DR_007	2	0
8.	British Gas Trading	P154_DR_008	1	0
9.	Scottish & Southern Energy	P154_DR_009	5	0
10.	British Energy	P154_DR_010	3	0

P154_DR_001 – IMServ Europe Limited

Respondent:	<i>Nicholas White</i>
No. of BSC Parties Represented	1
BSC Parties Represented	<i>IMServ Europe Ltd</i>
No. of Non BSC Parties Represented	0
Non BSC Parties represented	
Role of Respondent	<i>Agent</i>

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P154 and the provisional recommendation to the Authority contained in the draft Modification Report that P154 should be made? Please give rationale.	Yes / No	All changes should go through the same change management procedure. It appears as though there has been inconsistency with the way different changes and modifications have been managed.
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 / No	This amendment should remove any potential for deviation from the identified change management procedure.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P154? Please give rationale.	Yes / No	
4.	Are there any further comments on P154 that you wish to make?	Yes / No	

P154_DR_002 – EDF Energy

Respondent:	Paul Chesterman
No. of BSC Parties Represented	9
BSC 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 BSC Parties Represented	
Non BSC Parties represented	
Role of Respondent	Supplier / Generator / Party Agent / Distribution Business

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P154 and the provisional recommendation to the Authority contained in the draft Modification Report that P154 should be made? Please give rationale.	Yes	Ensure consistency of approach for all documents and that parties are confident full consultation has been undertaken prior to making changes.
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	It clarifies that full consultation on changes to the CSDs is to take place.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P154? Please give rationale.	Yes	Change is to process and this should not require a long lead time.
4.	Are there any further comments on P154 that you wish to make?	No	

P154_DR_003 – NGT

Respondent:	Name Clare Talbot (NGT)
No. of BSC Parties Represented	One
BSC Parties Represented	Please list all BSC Parties responding on behalf of (including the respondent company if relevant). National Grid
No. of Non BSC Parties Represented	None
Non BSC Parties represented	Please list all non BSC Parties responding on behalf of (including the respondent company if relevant). None
Role of Respondent	(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state ¹) BSC Party

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P154 and the provisional recommendation to the Authority contained in the draft Modification Report that P154 should be made? Please give rationale.	Yes	We support the Panel recommendation that modification P154 should be made and agree that the proposed change would help to clarify the consultation process for modifications.
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	We agree that the legal text addresses the defect identified and clarifies the requirements within the Code.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P154? Please give rationale.	Yes	We believe that the implementation timescale is appropriate to incorporate the necessary changes.
4.	Are there any further comments on P154 that you wish to make?	No	

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

P154_DR_004 – RWE Trading

Respondent:	<i>Richard Harrison</i>
No. of BSC Parties Represented	10
BSC Parties Represented	RWE Trading GmbH, RWE Innogy plc, Innogy Cogen Limited, Innogy Cogen Trading Limited, Npower Limited, Npower Direct Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited and Npower Yorkshire Supply Limited
No. of Non BSC Parties Represented	None
Non BSC Parties represented	N/A
Role of Respondent	<i>Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent</i>

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P154 and the provisional recommendation to the Authority contained in the draft Modification Report that P154 should be made? Please give rationale.	Yes	
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.	Qualified Yes	The issues identified in the Modification Proposal will only be fully addressed provided that a review of BSCP 40 is carried out as discussed/agreed by the GSMG, to clarify (<i>inter alia</i>) the arrangements for including documents which are not Code Subsidiary Documents within the scope of BSCP 40 and the timescales for assessment and progression of changes to CSDs which are related to Modification Proposals.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P154? Please give rationale.	Yes	
4.	Are there any further comments on P154 that you wish to make?	Yes	The question of whether (or to what extent) obligations created in documents which are not Code Subsidiary Documents are binding on Parties does not seem to have been fully answered, although inclusion of such documents formally within the scope of the Change Management (BSCP40) process would address the governance issue.

P154_DR_005 – Midlands Electricity

From: Aquila - LINK
Sent: 01 March 2004 10:59
To: ELEXON-Modifications
Subject: Midlands Electricity (Formally Aquilla Networks PLC) Response to P154 Consultation on draft Modification Report

Good Morning,

Midlands Electricity (Formally Aquilla Networks PLC) would like to return a response of 'No Comment' to P154 Consultation on draft Modification Report.

Regards,

Deborah Hayward
Distribution Support Office &
Deregulation Control Group
Aquila Networks plc

Tel DDI 01384 343772
Tel Int 09 3772
Fax 01384 405177
Email deborah.hayward@aquila-networks.co.uk &
 dso@aquila-networks.co.uk

P154_DR_006 – Scottish Power

Respondent:	<i>John W Russell</i>
No. of BSC Parties Represented	<i>6</i>
BSC Parties Represented	<i>Scottish Power UK plc; ScottishPower Energy Management Ltd; Scottish Power Generation Ltd; ScottishPower Energy Retail Ltd; SP transmission Ltd; SP Manweb PLC.).</i>
No. of Non BSC Parties Represented	<i>0</i>
Non BSC Parties represented	<i>N/A</i>
Role of Respondent	<i>Consolidator on behalf of Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent</i>

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P154 and the provisional recommendation to the Authority contained in the draft Modification Report that P154 should be made? Please give rationale.	Yes	We agree with GSMG that paragraph F3.2.1 of the Code requires amendment to clarify that all changes to CSDs must be consulted on to a level of detail and according to an appropriate timetable, regardless of whether or not the consultation had taken place earlier in the Modification Procedure. This will better facilitate achievement of the Applicable BSC Objectives (c) and (d).
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	We agree that the Legal Text would appear to be appropriate. However, we would suggest that the review of BSCP40 should take into account this drafting to enable the BSC and the BSCP to "dovetail" together with regards to CSDs.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P154? Please give rationale.	Yes	We agree that 5 Working Days after an Authority determination would appear to be appropriate.
4.	Are there any further comments on P154 that you wish to make?	Yes	Post implementation of this Modification; care must be taken by Panel in determining implementation dates, to take account of potential CSD "due process" consultation timescales.

P154_DR_007 – Western Power Distribution

Respondent:	Graham Smith
No. of BSC Parties Represented	2
BSC Parties Represented	Western Power Distribution (South West) & Western Power Distribution (South Wales)
No. of Non BSC Parties Represented	
Non BSC Parties represented	
Role of Respondent	LDSO

Q	Question	Response ¹	Rationale
1.	Do you agree with the Panel's views on P154 and the provisional recommendation to the Authority contained in the draft Modification Report that P154 should be made? Please give rationale.	Yes	We agree that this modification should be made as it will ensure that full industry consultation takes place when changes to Code Subsidiary Documents are planned. This is not currently always the case.
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	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P154? Please give rationale.	Yes	We consider that the modification should take effect as soon as possible so 5 working days after The Authority decision is reasonable
4.	Are there any further comments on P154 that you wish to make?	No	

P154_DR_008 – British Gas Trading



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

energy management group

**Charter Court
50 Windsor Road
Slough
Berkshire
SL1 2HA**

Tel. (01753) 758137
Fax (01753) 758368
Our Ref.
Your Ref.
1 March 2004

Dear Sirs,

Re: Modification Proposal P154 – Rectification of Inconsistencies in the Application of BSC Change Management Processes

Thank you for the opportunity of responding to this draft modification report considering Modification Proposal P154. British Gas Trading (BGT) agrees with the Panel's provisional recommendation that this Modification Proposal should be made.

The proposed amendments to the BSC provides greater clarity in terms of the obligations on the BSC Panel to consult before changes are made to existing Code Subsidiary Documents or new Code Subsidiary Documents are created. This should ensure Parties have visibility of new or amended obligations, which will improve the efficiency of the change process and thereby better facilitate Applicable BSC Objective (d).

BGT agrees with the proposed implementation date as detailed in the draft modification report. Due to the relatively minor amendment that is required it would appear sensible to make the changes outside of the scheduled batched release program.

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

Yours faithfully

Mark Manley
Contract Manager

P154_DR_009 – Scottish & Southern Energy

From: Garth Graham
Sent: 02 March 2004 09:53
To: ELEXON-Modifications
Subject: P154 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.

Further to your note of 17th February 2004, and the four questions listed in the Modification Report consultation for P154, we have the following comments to make:-

Q1 Do you agree with the Panel's views on P154 and the provisional recommendation to the Authority contained in the draft Modification Report that P154 should be made? Please give rationale.

Yes, we agree with the proposed BSC Panel recommendation to the Authority that the Proposed Modification Proposal P154 should be made.

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 P154? Please give rationale.

If the Modification Proposal P154 is approved, we agree with the proposed BSC Panel recommendation on the timing for the Implementation Date, as outlined in the Modification Report.

Q4 Are there any further comments on P154 that you wish to make?

Nothing further at this time.

Regards

Garth Graham
Scottish and Southern Energy plc

P154_DR_010 – British Energy

Respondent:	<i>Martin Mate</i>
No. of BSC Parties Represented	3
BSC Parties Represented	<i>British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, Eggborough Power Ltd</i>
No. of Non BSC Parties Represented	-
Non BSC Parties represented	-
Role of Respondent	<i>Supplier/Generator/Trader/Consolidator/Exemptable Generator/Party Agent</i>

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P154 and the provisional recommendation to the Authority contained in the draft Modification Report that P154 should be made? Please give rationale.	Yes	Formalisation of a process whereby parties are consulted and advised on the detail of all changes to Code Subsidiary Documents will improve process efficiency within participant organisations. From an operational perspective, the only difference between CSD changes proposed in connection with a modification proposal and other change proposals is that changes proposed in connection with an approved modification have more certainty of a change resulting, and the date of change. This difference may affect the responses provided to consultation.
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	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P154? Please give rationale.	Yes	We do not believe early implementation carries any adverse operational impact, or cost disadvantages. However, there is a possibility that changes to Code Subsidiary Documents forming part of modifications which have already been approved but not yet implemented may require urgent consultation as a result of rapid implementation of this modification.

Q	Question	Response	Rationale
4.	Are there any further comments on P154 that you wish to make?	Yes	<p>There is a difference between changes to Code Subsidiary Documents (a) occurring as a result of an approved modification, where change to CSDs to support the modification is effectively mandated and only implementation detail is open to comment and discussion and (b) proposed changes whose detailed specification and implementation are entirely subject to the authority of the BSC Panel (CPs) or Authority (Modifications). However, participants should have the opportunity to comment in both cases, and responses may reflect the circumstances.</p> <p>Where the modification process for an approved modification has included detailed consultation on Code Subsidiary Documents, we would expect further changes following approval to be minimal, and further consultation to make clear that it is primarily affirmation of previously proposed changes.</p>