

## Responses from P153 Draft Report Consultation

Consultation issued 17 December 2003.

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>	Western Power Distribution	P153_DR_001	2	0
<b>2.</b>	YEDL and NEDL	P153_DR_002	2	0
<b>3.</b>	EDF Energy Networks plc	P153_DR_003	9	0
<b>4.</b>	British Gas Trading	P153_DR_004	1	0
<b>5.</b>	Scottish Power UK plc	P153_DR_005	6	0
<b>6.</b>	Scottish and Southern Energy	P153_DR_006	5	0
<b>7.</b>	IMServ Europe Ltd (late response)	P153_DR_007	0	1

**P153\_DR\_001 – Western Power Distribution**

<b>Respondent:</b>	
<b>No. of BSC Parties Represented</b>	2
<b>BSC Parties Represented</b>	<i>Western Power Distribution (South West) &amp; Western Power Distribution (South Wales)</i>
<b>No. of Non BSC Parties Represented</b>	
<b>Non BSC Parties represented</b>	<i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i>
<b>Role of Respondent</b>	<i>Distributor</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 views on P153 and the provisional recommendation to the Authority contained in the draft Modification Report that P153 should not be made? Please give rationale.	Yes	The industry is already investigating the requirements for migration of metering points between LDSOs. It is unlikely that the BSC will need to be modified as changes should be confined to the MRA and BSCPs.
2.	Are there any further comments on P153 that you wish to make?	No	

**P153\_DR\_002 YEDL and NEDL**

<b>Respondent:</b>	
<b>No. of BSC Parties Represented</b>	2
<b>BSC Parties Represented</b>	<i>YEDL and NEDL</i>
<b>No. of Non BSC Parties Represented</b>	
<b>Non BSC Parties represented</b>	<i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i>
<b>Role of Respondent</b>	<i>Distributor</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 views on P153 and the provisional recommendation to the Authority contained in the draft Modification Report that P153 should not be made? Please give rationale.	Yes	Whilst we acknowledge that the current industry framework does not readily facilitate the transfer of metering points between one SMRS and another (it requires the MPAN to be de-registered in SMRS and registered in a new SMRS). We do not believe that the role of transfer co-ordinator would resolve this difficulty or facilitate the process.
2.	Are there any further comments on P153 that you wish to make?	No	

**P153\_DR\_003 EDF Energy Networks plc**

<b>Respondent:</b>	
<b>No. of BSC Parties Represented</b>	9
<b>BSC 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 BSC Parties Represented</b>	
<b>Non BSC Parties represented</b>	
<b>Role of Respondent</b>	Supplier / Generator / Party Agent / Distribution Business

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you agree with the Panel's views on P153 and the provisional recommendation to the Authority contained in the draft Modification Report that P153 should not be made? Please give rationale.	Yes	Although this change is required there is no section of BSC that seems to be impacted by this change. We agree that a change proposal needs to be progressed to provide an agreed process that all parties can follow. Given that possibility for trading network assets exists it is important for all parties to understand processes that need to be followed in order to minimise customer and settlement impact for such situations.
2.	Are there any further comments on P153 that you wish to make?	No	

**P153\_DR\_004**

<b>Respondent:</b>	
<b>No. of BSC Parties Represented</b>	BGAS ENRD EDIR
<b>BSC Parties Represented</b>	BGAS ENRD EDIR
<b>No. of Non BSC Parties Represented</b>	
<b>Non BSC Parties represented</b>	
<b>Role of Respondent</b>	Supplier

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you agree with the Panel's views on P153 and the provisional recommendation to the Authority contained in the draft Modification Report that P153 should not be made? Please give rationale.	Yes	<p>We remain supportive that an agreed and documented process should be implemented to facilitate the migration of Metering Systems following the implementation of P62.</p> <p>As this Modification does not appear to require any changes to the Code to address the deficiency documented, we believe that the live Change Proposal CP1026 should be the correct vehicle for the Migrations Issues Working Group to work-up a proposed solution.</p>
2.	Are there any further comments on P153 that you wish to make?	No	

**P153\_DR\_005 – Scottish Power UK plc**

<b>Respondent:</b>	SAIC Ltd
<b>No. of BSC Parties Represented</b>	6
<b>BSC Parties Represented</b>	Scottish Power UK plc; ScottishPower Energy Management Ltd.; ScottishPower Generation Ltd; ScottishPower Energy Retail Ltd.; SP Transmission Ltd; SP Manweb plc.
<b>No. of Non BSC Parties Represented</b>	0
<b>Non BSC Parties represented</b>	
<b>Role of Respondent</b>	Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you agree with the Panel's views on P153 and the provisional recommendation to the Authority contained in the draft Modification Report that P153 should not be made? Please give rationale.	<b>Yes</b>	<i>We agree with the Panel's recommendation to reject this Modification Proposal on the basis that Change Proposal CP1026 has already been raised and is the more appropriate vehicle for progressing this subject.</i>
2.	Are there any further comments on P153 that you wish to make?	<b>Yes</b>	<i>We are aware that MEC / MDB set up the Migration Issues Working Group to look into this area and that they will be sending a paper to January's MEC stating the processes they feel are required to manage a transfer of assets, therefore it would seem appropriate that the solution to the MEC paper and CP1026 should be compatible with one another.</i>

**P153\_DR\_006**

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 two questions contained within your note of 17th December 2003, and the associated Modification Report for P153, we have the following comments to make:-

Q1 Do you agree with the Panel's views on P153 and the provisional recommendation to the Authority contained in the draft Modification Report that P153 should not be made? Please give rationale.

Yes, we agree with the proposed BSC Panel recommendation to the Authority that Modification Proposal P153 should not be made for the reasons outlined in the Modification Report.

Q2 Are there any further comments on P153 that you wish to make?

Nothing further at this time.

**P153\_DR\_007 IMServ Europe**

<b>Respondent:</b>	
<b>No. of BSC Parties Represented</b>	
<b>BSC Parties Represented</b>	<i>IMServ Europe Ltd</i>
<b>No. of Non BSC Parties Represented</b>	
<b>Non BSC Parties represented</b>	
<b>Role of Respondent</b>	<i>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 views on P153 and the provisional recommendation to the Authority contained in the draft Modification Report that P153 should not be made? Please give rationale.	Yes / No	The Migration Process for P62 requires further investigation and a CP to look at the options is sensible. Additionally it does sound like P153 is to be superseded by CP1026, and the need for additional analysis on the most preferred process for migration.
2.	Are there any further comments on P153 that you wish to make?	Yes / No	