

Responses from P150 Draft Report Consultation

Consultation issued 27 January 2004.

Representations were received from the following parties:

No	Company	File Number	No. BSC Parties Represented	No. Non-Parties Represented
1.	CECL	P150_DR_001	4	1
2.	Derwent Cogeneration Limited	P150_DR_002	1	
3.	Powergen	P150_DR_003	14	
4.	BGT	P150_DR_004	1	
5.	Midlands Electricity	P150_DR_005		1
6.	Scottish and Southern Energy	P150_DR_006	5	

P150_DR_001 – CECL

Respondent:	
No. of BSC Parties Represented	4
BSC Parties Represented	<i>CECL, IETS, RPCL, SPAL</i>
No. of Non BSC Parties Represented	1
Non BSC Parties represented	<i>InterGen (UK) Ltd</i>
Role of Respondent	<i>Generator</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P150 and the provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P150 should not be made? Please give rationale.	Yes	As there have been no PNE appeals, this mod has no impact and so should not be made.
2.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P150? Please give rationale.	Yes	N/a
3.	Are there any further comments on P150 that you wish to make?	No	

P150_DR_002 Derwent Cogeneration

Respondent:	
No. of BSC Parties Represented	
BSC Parties Represented	<i>Derwent Cogeneration Ltd</i>
No. of Non BSC Parties Represented	
Non BSC Parties represented	<i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>Generator</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P150 and the provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P150 should not be made? Please give rationale.	YES	
2.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P150? Please give rationale.	YES	
3.	Are there any further comments on P150 that you wish to make?	NO	

P150_DR_003 Powergen

Respondent:	<i>Name: Powergen</i>
No. of BSC Parties Represented	14
BSC Parties Represented	<i>Please list all BSC Parties responding on behalf of (including the respondent company if relevant). Powergen UK plc, Powergen Retail Limited, Cottam Development Centre Limited, TXU Europe Drakelow Limited, TXU Europe Ironbridge Limited, TXU Europe High Marnham</i>

	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 Limited
No. of Non BSC Parties Represented	-
Non BSC 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 P150 and the provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P150 should not be made? Please give rationale.	Yes	As no appeals have been raised, we concur with the Panel's recommendation that P150 should not be made. As proposer of this modification we have consistently stated that if no appeals were raised the modification should be ceased in the most expeditious manner.
2.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P150? Please give rationale.	Yes	We are in agreement with the Panel's provisional recommendation with regard to the Implementation Date.
3.	Are there any further comments on P150 that you wish to make?	No	

P150_DR_004 BGT

Dear Sirs,

Re: Modification Proposal P150 – Targeting excess costs of PNE appeals process at unsuccessful appellants.

Thank you for the opportunity of responding to this draft modification report considering Modification Proposal P150. British Gas Trading (BGT) agrees with the Panel's provisional recommendation that the Modification Proposal should not be made.

If you have any questions regarding this response please contact me 01753 758137.

Yours faithfully

P150_DR_005 Midlands Electricity

Midlands Electricity (Formally Aquila Networks PLC) would like to return a response of 'No Comment' to P150 Report Consultation.

Regards,

Distribution Support Office &
Deregulation Control Group
Midlands Electricity

P150_DR_006 Scottish and Southern Energy

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 three questions contained within your note of 27th January 2004, and the associated Modification Consultation for P150, we have the following comments to make:-

Q1 Do you agree with the Panel's views on P150 and the provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P150 should not be made? Please give rationale.

Yes. We believe that P150 should not be made as there have been no appeals against the PNE process (and therefore the defect which P150 was addressing does not exist).

Q2 Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P150? Please give rationale.

If the Modification Proposal P150 is approved, we agree with the proposed BSC Panel recommendation on the timing for the Implementation Date, as outlined in the Modification Report.

Q3 Are there any further comments on P150 that you wish to make?

Nothing further at this time.