

Responses from P131 Draft Report Consultation

Consultation issued 17 December 2003

Representations were received from the following parties:

No	Company	File Number	No. BSC Parties Represented	No. Non-Parties Represented
1.	National Grid	P131_MR_001	1	0
2.	British Gas Trading	P131_MR_002	1	0
3.	Aquila Networks Plc	P131_MR_003	1	0
4.	Scottish Power UK plc	P131_MR_004	6	0
5.	RWE Trading	P131_MR_005	10	0
6.				
7.				
8.				
9.				
10.				

P131_MR_001 – National Grid

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

1.1	1.2 Question	1.3 Response ¹	1.4 Rationale
1.	Do you agree with the Panel's views on P131 and the provisional recommendation to the Authority contained in the draft Modification Report that P131 should be made? Please give rationale.	Yes	We agree with the Panel's provisional recommendation for approval of the modification and support the principle to incorporate provisions in the Code for the timely detection and prompt rectification of Trading Disputes.
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 P131? Please give rationale.	Yes	We believe the planned implementation process provides an adequate period for Parties to make the necessary changes to their internal working processes to adopt the new obligations.
4.	Are there any further comments on P131 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



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Our Ref.
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2 January 2004

Dear Sirs,

**Re: Modification Proposal P131 – Introduction of Further provisions
relating to the Determination of Trading Disputes**

Thank you for the opportunity of responding to this draft modification report considering Modification Proposal P131. British Gas Trading (BGT) agrees that the Modification Proposal will better facilitate Applicable BSC Objective (c) as it should encourage timely detection of errors and improve the overall accuracy of data in Settlement.

BGT agree with the recommended implementation date for P131. P131 re-introduces time based criteria which must be complied with in order for a Trading Dispute to be upheld by the TDC. The recommended implementation dates will allow ELEXON to communicate the new requirements to Parties via an education workshop and thereby enable Parties to make any necessary changes to their working procedures.

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

Yours faithfully

Mark Manley
Contract Manager

P131_MR_003– Aquila Networks Plc

Good Morning,

Aquila Networks PLC would like to return a response of 'No Comment' to P131 Consultation on Draft Modification Report.

Regards,

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

P131_MR_004– Scottish Power UK plc

Respondent:	Man Kwong Liu (SAIC Ltd)
No. of BSC Parties Represented	6
BSC Parties Represented	<i>Please list all BSC Parties responding on behalf of (including the respondent company if relevant).</i> Scottish Power UK plc; ScottishPower Energy Management Ltd.; ScottishPower Generation Ltd; ScottishPower Energy Retail Ltd.; SP Transmission Ltd; SP Manweb plc.
No. of Non BSC Parties Represented	0
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>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state ²)</i> Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent

1.5	Question	Response ¹	Rationale
1.	Do you agree with the Panel's views on P131 and the provisional recommendation to the Authority contained in the draft Modification Report that P131 should be made? Please give rationale.	Yes	We believe that by having clearly laid down criteria for trading disputes, it would enable timely resolution of any settlement errors, which could improve the liquidity of smaller companies. This would better facilitate the achievement of the Applicable BSC Objectives (c) – promote effective competition. However, we also believe that having objective detailed criteria would also improve the trading dispute process for the TDC in its determination and for BSC parties in raising any potential disputes. This would better facilitate the achievement of the Applicable BSC Objectives (d) – promote efficiency. 1.6
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 agreed that the legal text is appropriate.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P131? Please give rationale.	Yes	While we prefer as early an implementation as possible, we accept the recommendation that the proposed implementation date would be the most appropriate.

² Delete as appropriate – please do not use strikethrough, this is to make it easier to analyse the responses

1.5	Question	Response ¹	Rationale
4.	Are there any further comments on P131 that you wish to make?	1.7 No	1.8

P131_MR_005– RWE Trading

Respondent:	Mark Thomas
No. of BSC Parties Represented	10
BSC Parties Represented	RWE Trading, RWE Innogy Group (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	
Non BSC Parties represented	
Role of Respondent	<i>(Supplier/Generator/ Trader / BSC Agent)</i>

1.9	Question	Response ¹	Rationale
1.	Do you agree with the Panel's views on P131 and the provisional recommendation to the Authority contained in the draft Modification Report that P131 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.	Yes	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P131? Please give rationale.	Yes	We agree that the modification should be implemented in a scheduled release to avoid unnecessary extra cost.
4.	Are there any further comments on P131 that you wish to make?	No	