

Responses from P130 Draft Report Consultation

Consultation issued 20 June 2003

Representations were received from the following parties:

No	Company	File Number	No. BSC Parties Represented	No. Non-Parties Represented
1.	NGT	P130_DR_001	1	0
2.	LE Group	P130_DR_002	9	0
3.	British Gas Trading	P130_DR_003	1	0
4.	Powergen	P130_DR_004	15	0
5.	YEDL/NEDL	P130_DR_005	2	0
6.	IMServ	P130_DR_006	0	1
7.	Npower	P130_DR_007	9	0
8.	Aquila Networks	P130_DR_008	1	0
9.	Scottish Power	P130_DR_009	6	0

P130_DR_001 – NGT

Respondent:	<i>Name</i> 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).</i> National Grid
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).</i> None
Role of Respondent	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state)</i> BSC Party

	Question	Response	Rationale
1.	Do you agree with the Panel's views on P130 and the provisional recommendation to the Authority contained in the draft Modification Report that P130 should be made? Please give rationale.	Yes	We agree that an ambiguity has been identified which should be addressed via a modification to the Code.
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.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P130? Please give rationale.	Yes	We agree with the proposal to align the implementation of this modification with P99 to progress the respective changes required to BSCP533.
4.	Are there any further comments on P130 that you wish to make?	No	

P130_DR_002 – LE Group

Respondent:	Paul Chesterman
No. of BSC Parties Represented	9
BSC Parties Represented	LE Group plc, London Electricity plc, Jade Power Generation Ltd, Sutton Bridge Power Ltd, West Burton Power, London Power Networks plc, EPN Distribution Ltd, Seeboard Power Networks plc, Seeboard Energy Ltd,
No. of Non BSC Parties Represented	None that we consider applicable
Non BSC Parties represented	
Role of Respondent	Supplier / Generator / Party Agent / Distribution Business

	Question	Response	Rationale
1.	Do you agree with the Panel's views on P130 and the provisional recommendation to the Authority contained in the draft Modification Report that P130 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 P130? Please give rationale.	Yes	
4.	Are there any further comments on P130 that you wish to make?	No	

P130_DR_003 – British Gas Trading

Re: Draft Modification Report P130 Clarification of the Treatment of Non Half Hourly (NHH) Export Consumption within PARMS Performance Serial 1

Thank you for the opportunity of responding to this draft modification report considering Modification Proposal P130. British Gas Trading (BGT) supports the Modification Proposal and believes this would better facilitate Applicable BSC Objectives (c). The Modification proposal adds clarity to the BSC and seeks to maintain accuracy of supplier charges.

BGT support the BSC Panels view that the legal text as outlined in the draft Modification Report correctly addresses the ambiguity identified within the Modification Proposal and supports the BSC Panels provisional recommendation for an implementation timescale of 20th January 2004, in line with the implementation date of P99.

If you would like to discuss this matter further please do not hesitate to contact me directly.

Yours sincerely,

Claire Walsh
Account Manager (BSC)

P130_DR_004 – Powergen

Respondent:	Russell Loasby
No. of BSC Parties Represented	15
BSC Parties Represented	Powergen UK plc, Powergen Retail Limited, Diamond Power Generation Limited, Cottam Development Centre Limited, TXU Europe Drakelow Limited, TXU Europe Ironbridge Limited, TXU Europe 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 Limited
No. of Non BSC Parties Represented	0
Non BSC Parties represented	N/A
Role of Respondent	Supplier

	Question	Response	Rationale
1.	Do you agree with the Panel's views on P130 and the provisional recommendation to the Authority contained in the draft Modification Report that P130 should be made? Please give rationale.	Yes	Current version of Serial 1 definition produces perverse incentive.
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.	No	The "For avoidance of doubt, values associated .." addenda in 2.2.2 (a) & (b) could still be misconstrued as even negative numbers can be added. Perhaps wording should be ... absolute values associated
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P130? Please give rationale.	Yes	Avoids unnecessary cost
4.	Are there any further comments on P130 that you wish to make?	No	

P130_DR_005 – YEDL/NEDL

Respondent:	<i>Ann Penford</i>
No. of BSC Parties Represented	2
BSC Parties Represented	<i>NEDL and YEDL</i>
No. of Non BSC Parties Represented	N/A
Non BSC Parties represented	<i>N/A</i>
Role of Respondent	<i>Party Agent / Distribution</i>

	Question	Response	Rationale
1.	Do you agree with the Panel's views on P130 and the provisional recommendation to the Authority contained in the draft Modification Report that P130 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 P130? Please give rationale.	Yes	
4.	Are there any further comments on P130 that you wish to make?	No	

P130_DR_006 – IMServ

Respondent:	<i>Name</i>
No. of BSC Parties Represented	0
BSC Parties Represented	N/A
No. of Non BSC Parties Represented	1
Non BSC Parties represented	<i>IMServ Europe Ltd</i>
Role of Respondent	<i>Party Agent</i>

	Question	Response	Rationale
1.	Do you agree with the Panel's views on P130 and the provisional recommendation to the Authority contained in the draft Modification Report that P130 should be made? Please give rationale.	Yes	The ambiguity does indeed exist and at present NHH export energy is not considered correctly. It needs to be clarified in light of the mod to remove the need for specifically HH metering at export sites, and thus any change is an impact. IMServ has no issue with the proposal for this reason.
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 P130? Please give rationale.	Yes	Needs to be in line with implementation of P99 (PARMs project)
4.	Are there any further comments on P130 that you wish to make?	No	

P130_DR_007 – Npower

Respondent:	<i>Name</i>
No. of BSC Parties Represented	9
BSC Parties Represented	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	<i>N/A</i>
Role of Respondent	<i>Supplier / Generator / Trader / Consolidator / Exemptable Generator Party Agent</i>

	Question	Response	Rationale
1.	Do you agree with the Panel's views on P130 and the provisional recommendation to the Authority contained in the draft Modification Report that P130 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 P130? Please give rationale.	No	This problem with the current wording of the BSC should be corrected with effect from 28 September 2003, to be coincident with the implementation of P81 Alternative, which has created the issue.
4.	Are there any further comments on P130 that you wish to make?	No	

P130_DR_008 – Aquila Networks

Please find that Aquila Networks Plc response to P130 Consultation on draft Modification Report is 'No Comment'.

regards
Rachael Gardener

Deregulation Control Group &
Distribution Support Office
AQUILA NETWORKS

P130_DR_009 – Scottish Power

Respondent:	<i>Name John W Russell (SAIC Ltd)</i>
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 Trading Ltd.; ScottishPower Generation Ltd; ScottishPower Energy Retail Ltd.; SP Transmission Ltd; SP Manweb plc.
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	Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent / Interconnector Administrator

	Question	Response	Rationale
1.	Do you agree with the Panel's views on P130 and the provisional recommendation to the Authority contained in the draft Modification Report that P130 should be made? Please give rationale.	<i>No</i>	<i>We agree with the Panel that clarification to clear up ambiguity is desirable, but we have concerns that the legal drafting being suggested to implement this change will need to be amended when the P99 text has been finalised. Could any clarification in this area not be encompassed in the P99 re-drafting of the BSC and related procedures?</i>
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.	<i>No</i>	<i>We disagree with the Panel's view on the legal text. Any draft amendments to Annex S-1 of the code and BSCP533-App4.13 is premature given that the draft legal text for P99 has not been issued yet. It is unlikely that either of the sections of the documents being proposed for change under P130 will exist in their present form after P99. Some of the existing serials are being removed whilst others are being merged and renamed. It is impossible to agree the text set out in P130 which although being proposed for implementation at the same time as P99 has its text redrafting based on the pre-P99 BSC and BSCP.</i>

	Question	Response	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P130? Please give rationale.	<i>No</i>	<i>Although it would be sensible to implement any changes in this area at the same time as P99, P130 in its current form cannot be agreed for the reasons outlined in 2 above.</i>
4.	Are there any further comments on P130 that you wish to make?	<i>No</i>	