

## **MODIFICATION REPORT for Modification Proposal P130 Clarification of the Treatment of Non Half Hourly (NHH) Export Consumption within PARMS Performance Serial 1**

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### **RECOMMENDATIONS**

The Balancing and Settlement Code Panel recommends that:

- **Proposed Modification P130 should be made; and**
- **The Implementation Date should be 20 January 2004 if an Authority Determination is received by 1 September 2003.**

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<sup>1</sup> ELEXON Ltd currently fulfils the role of the Balancing and Settlement Code Company ('BSCCo'), pursuant to Annex X-1 of the Balancing and Settlement Code (the 'Code').

<sup>2</sup> The current version of the Balancing and Settlement Code (the 'Code') can be found at [www.elexon.co.uk/ta/bscres\\_docs/bsc\\_code.html](http://www.elexon.co.uk/ta/bscres_docs/bsc_code.html)

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### SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

The following parties/documents have been identified as being impacted by Modification Proposal P130.

Parties	Sections of the BSC	Code Subsidiary Documents
Suppliers <input checked="" type="checkbox"/>	A <input type="checkbox"/>	BSC Procedures <input checked="" type="checkbox"/>
Generators <input type="checkbox"/>	B <input type="checkbox"/>	Codes of Practice <input type="checkbox"/>
Licence Exemptable Generators <input type="checkbox"/>	C <input type="checkbox"/>	BSC Service Descriptions <input type="checkbox"/>
Transmission Company <input type="checkbox"/>	D <input type="checkbox"/>	Service Lines <input type="checkbox"/>
Interconnector <input type="checkbox"/>	E <input type="checkbox"/>	Data Catalogues <input type="checkbox"/>
Distribution System Operators <input type="checkbox"/>	F <input type="checkbox"/>	Communication Requirements Documents <input type="checkbox"/>
<b>Party Agents</b>		
Data Aggregators <input type="checkbox"/>	G <input type="checkbox"/>	Reporting Catalogue <input type="checkbox"/>
Data Collectors <input type="checkbox"/>	H <input type="checkbox"/>	MIDS <input type="checkbox"/>
Meter Operator Agents <input type="checkbox"/>	J <input type="checkbox"/>	<b>Core Industry Documents</b>
ECVNA <input type="checkbox"/>	K <input type="checkbox"/>	Grid Code <input type="checkbox"/>
MVRNA <input type="checkbox"/>	L <input type="checkbox"/>	Supplemental Agreements <input type="checkbox"/>
<b>BSC Agents</b>		
SAA <input type="checkbox"/>	M <input type="checkbox"/>	Ancillary Services Agreements <input type="checkbox"/>
FAA <input type="checkbox"/>	N <input type="checkbox"/>	Master Registration Agreement <input type="checkbox"/>
BMRA <input type="checkbox"/>	O <input type="checkbox"/>	Data Transfer Services Agreement <input type="checkbox"/>
ECVAA <input type="checkbox"/>	P <input type="checkbox"/>	British Grid Systems Agreement <input type="checkbox"/>
CDCA <input type="checkbox"/>	Q <input type="checkbox"/>	Use of Interconnector Agreement <input type="checkbox"/>
TAA <input type="checkbox"/>	R <input type="checkbox"/>	Settlement Agreement for Scotland <input type="checkbox"/>
CRA <input type="checkbox"/>	S <input checked="" type="checkbox"/>	Distribution Codes <input type="checkbox"/>
Teleswitch Agent <input type="checkbox"/>	T <input type="checkbox"/>	Distribution Use of System Agreements <input type="checkbox"/>
SVAA <input type="checkbox"/>	U <input type="checkbox"/>	Distribution Connection Agreements <input type="checkbox"/>
BSC Auditor <input type="checkbox"/>	V <input type="checkbox"/>	
Profile Administrator <input type="checkbox"/>	W <input type="checkbox"/>	
Certification Agent <input type="checkbox"/>	X <input checked="" type="checkbox"/>	
MIDP <input type="checkbox"/>	Y <input type="checkbox"/>	
TFLA <input type="checkbox"/>	Z <input type="checkbox"/>	
<b>Other Agents</b>		
SMRA <input type="checkbox"/>		
Data Transmission Provider <input type="checkbox"/>		

  

P130 implementation cost	
• Change specific	£0,000
• Operational/maintenance	£0,000
• ELEXON Effort (Development)	10 man days
<b>TOTAL COST</b>	<b>£0,000 + 10 ELEXON man days</b>

# 1 DESCRIPTION OF PROPOSED MODIFICATION AND ASSESSMENT AGAINST THE APPLICABLE BSC OBJECTIVES

## 1.1 Modification Proposal

Modification Proposal P130 'Clarification of the Treatment of Non Half Hourly (NHH) Export Consumption within PARMS Performance Serial 1' (P130) was raised by TXU Direct Sales Limited on 2 June 2003 to remove a perceived ambiguity in PARMS Serial 1. This ambiguity has emerged as a result of the approval of Alternative Modification Proposal P81 'Removal of the Requirement for Half Hourly Metering on Third Party Generators at Domestic Premises' (P81).

P81 introduces the concept of NHH Export energy. The Proposer believes that the treatment of NHH Export Consumption in PARMS Serial 1 is unclear – i.e. whether NHH Export Consumption should be added or subtracted from the NHH Import Consumption for the purpose of determining the amount of energy settled on the basis of estimates.

The equations for the treatment of NHH Consumption in PARMS Serial 1, contained in Section 2.2.2 Annex S-1 of the Code, instruct that Consumption Component Classes (CCCs) should be 'summed':

$\Sigma_{N(AA)}$  means summed over all Consumption Component Classes (N) that are associated with Annualised Advances

$\Sigma_{N(EAC)}$  means summed over all Consumption Component Classes (N) that are associated with Estimated Annual Consumptions and are not associated with Unmetered Supplies

However, reading the entry for the basic summation term for NHH Consumption in the Technical Glossary of the Code (Annex X-2, Table X-5) suggests Export should be subtracted from Import:

$\Sigma_N =$  summed over all Consumption Component Classes (N) where, in such summation, values associated with Consumption Component Classes associated with Third Party Generating Plant comprised in SVA Metering Systems shall be subtracted and values associated with all other Consumption Component Classes shall be added.

The Proposer believes that this discrepancy between the two sections of the Code, and the resulting ambiguity as to how NHH Export Consumption ought to be treated, constitutes a defect in the Code.

Clarification is required to specify that NHH Export Consumption should be added to NHH Import Consumption, rather than the former being subtracted from the latter. Such a clarification would have the benefit of maintaining the intent of Supplier Charges.

Supplier Charges are a financial instrument designed to maintain the quality of Settlement data. One component of which is a charge on Suppliers who exceed specified limits on the proportion of NHH data submitted which may be estimated data (as opposed to metered volumes). Addressing the ambiguity in the Code is essential to avoid undermining the incentive on Suppliers to submit accurate NHH data. Were it to remain, a perverse incentive on Suppliers not to process meter advances for Export metering systems could be created – Export Estimated Annual Consumption (EAC) values would artificially increase the percentage of energy settled on Annualised Advance, through being netted off from Import EAC values.

P130 proposes addressing this defect by clarifying that NHH Export Consumption should be added to NHH Import Consumption for the purposes of PARMS Serial 1 in order to preserve the existing incentive on Suppliers to submit as accurate data as possible into Settlement. Therefore, P130 would better facilitate achievement of the Applicable BSC Objective (c):

*'Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity.'*

The Proposer notes that implementation of P130 would result in the different treatment of Export energy between PARMS Serial 1, which covers NHH data, and PARMS Serials 2 to 8, which cover HH data. However, this difference is justified. The rules for NHH Export EAC and Default are the same as those for NHH Import EAC and Default. Therefore the effect of both should be seen in the Provision of NHH Data - Serial 1. In the HH market, the Import and Export EACs and Defaults are treated differently and therefore the Export CCCs are excluded from the equivalent Serial.

BSCCo prepared an Initial Written Assessment (IWA) of P130 (Reference 1) and presented it to the Panel on June 12 2003. The Panel agreed with BSCCo's recommendation that P130 should be sent directly to the Report Phase on the basis that it was self evident that the proposed change would better facilitate achievement of the Applicable BSC Objectives (see Section 1.4 for the rationale for BSCCo's recommendations).

BSCCo prepared a draft Modification Report on the basis of Panel's provisional recommendations and issued that report, along with draft legal text, for consultation on 20 June 2003. The responses received were collated and the draft Modification Report, incorporating those responses, was considered by the Panel at its 10 July 2003 meeting.

## **1.2 Proposed Modification**

Proposed Modification is described in Section 1.1 above.

## **1.3 Issues raised by the Proposed Modification**

No issues were identified during the IWA or raised during the consultation process carried out as part of the Report Phase.

## **1.4 Assessment of how the Proposed Modification will better facilitate the Applicable BSC Objectives**

BSCCo recommended to that the Panel that P130 should be submitted to the Report Phase with a provisional recommendation that it be made. Initial assessment indicated that it was self evident that achievement of Applicable BSC Objective (c) would be better facilitated by P130 - the ambiguity present in the Code serves no purpose, renders the treatment of NHH Export Consumption unclear for the purposes of PARMS Serial 1 and its removal would increase the probability that the desired charges are levied on Suppliers for breach of data quality standards. In addition, implementation of P130 would have minimal impact confined to minor changes to the Code and a single BSCP.

BSCCo recommended that P130 should be implemented on 20 January 2004, so that it coincides with the implementation of the SVAA software changes necessary to support P81 and P99 'Changes to Accreditation and the PARMS Serials and Standards, resulting from the Performance Assurance Framework (PAF) Review (Phase 1)' (P99).

Whilst the Code changes for P81 are scheduled for implementation on 28 September 2003, the SVAA software development will be implemented on 20 January 2004. As a consequence, between 28 September 2003 and 20 January 2004, NHH Export Consumption will be excluded from Settlement.

P99 is also scheduled for implementation on 20 January 2004, and will also require changes to BSCP533 'PARMS Data Provision'. Therefore, it would appear efficient to synchronise implementation of P130 with that of P99 so that the respective changes to BSCP533 can be made effective at the same time.

## **1.5 Governance and regulatory framework assessment**

No issues were identified in the IWA raised during the consultation process carried out as part of the Report Phase.

## 2 RATIONALE FOR PANEL'S RECOMMENDATIONS

The Panel is of the opinion that implementation of P125 would better facilitate achievement of Applicable BSC Objective (c):

*'Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity.'*

The Panel agreed with BSCCo's assessment that it is self evident that P130 would better facilitate achievement of Applicable BSC Objective (c) - the ambiguity present in the Code serves no purpose, renders the treatment of NHH Export Consumption unclear for the purposes of PARMS Serial 1 and its removal would increase the probability that accurate charges are levied on Suppliers for breach of data quality standards.

## 3 IMPACT ON BSC SYSTEMS AND PARTIES

Implementation of P130 would have a minor impact on BSCCo but no impact on either the BSC Systems or BSC Parties.

### 3.1 BSCCo

During the IWA, the following impacts on BSCCo were identified:

- **Requirement to make necessary changes to the BSC:** the nature of the changes is outlined in Section 4.1.
- **Requirement to make necessary changes to BSCP 533:** the nature of the changes is outlined in Section 4.2.

There would be no impact on PARMS, which already has the functionality required by P130.

### 3.2 BSC Systems

No impact identified. The SVA confirmed that its systems already possess the functionality required by P130.

### 3.3 Parties and Party Agents

The IWA indicated that implementation of P130 would have minimal impact on BSC Party systems and processes. Trading Party systems and processes would need to be capable of replicating the equations specified under PARMS Serial 1. However, this impact is expected to be minimal at most – systems should be easily modifiable so as to be capable of adding NHH Export CCCs rather than subtracting them. This ought not to be significant given that NHH Imports are already being added to each other.

## 4 IMPACT ON CODE AND DOCUMENTATION

Implementation of P130 would require minor changes to the Code and BSCP533 'PARMS Data Provision'. There would be no impact on either the BSCCo Memorandum and Articles of Association or Core Industry Documents.

### 4.1 Balancing and Settlement Code

The following changes to the Code would need to be made to give effect to P130:

Item	Potential Impact of Proposed Modification
S: ANNEX S-1 Performance Levels and Supplier Charges	The treatment of NHH Consumption Component Classes, contained in section 2.3.3, would need to be amended

	to specify that Export is added to rather than subtracted from Import.
X: ANNEX X-2 Technical Glossary	The entry for the basic summation term for NHH Consumption would need to be amended to specify that Export is added to rather than subtracted from Import.

The Legal text, approved by the Panel, necessary to give effect to P130 is attached as Annex 1 of this report.

## 4.2 Code Subsidiary Documents

The following changes to BSCP 533 'PARMS Data Provision' would need to be made to give effect to P130:

Item	Potential Impact of Proposed Modification
BSCP 533 'PARMS Data Provision'	The 'Provision of Non Half Hourly Data' portion of the 'Monitoring Implementation Requirements', Appendix 4.13 of BSCP 533, would need to be amended. Under the 'Clarifications' section, the note stating that Licence Exempt Generation is excluded from the calculations would need to be removed and a note inserted to specify that Import and Export CCCs are added together, rather than Export being subtracted from Import.

## 5 SUMMARY OF CONSULTATIONS

A draft version of this Modification Report was issued for consultation on 20 June 2003, with a deadline for responses of 1 July 2003. Nine responses were received, representing 44 BSC Parties and 1 non-BSC Party. All responses received are attached as Annex 2 of this document, and the table below provides a summary of those responses.

Consultation question	Respondent agrees	Respondent disagrees	Opinion unexpressed
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?	7	1 <sup>3</sup>	1
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?	6	2	1
Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P130?	6	2	1
Are there any further comments on P130 that you wish to make?	<b>no responses received to this question</b>		

<sup>3</sup> Please note that the respondent who indicated that they opposed P130, subsequently withdrew their opposition once BSCCo had addressed their concern (see section 5.1 below). Taking this change into account, support for P130 was unanimous (i.e. eight in favour and none against).

## 5.1 Opinion on Provisional Recommendations

Seven of the nine respondents supported the Panel's provisional recommendation that P130 should be made. These respondents were of the opinion that an ambiguity exists, that such an ambiguity has the potential to place a perverse incentive on Suppliers and that, as such, it should be removed from the Code.

One respondent indicated they disagreed with the Panel's provisional recommendations. Whilst agreeing that an ambiguity which needs addressing exists, the respondent was of the opinion that the draft legal text provided would not remove the ambiguity as desired. BSCCo addressed the defect identified in the legal text by this respondent, who subsequently withdrew their opposition to P130 as a consequence. The final respondent expressed no opinion on the Panel's provisional recommendations.

## 5.2 Opinion on Draft Legal Text

Six of the nine respondents indicated that they agreed that the draft legal text provided would correctly address the defect identified in P130.

Two respondents did not agree that the draft legal text would address the defect as intended. One respondent expressed the concern that the text did not take into account changes to the same area of the Code to be implemented on the same day to give effect to P99. BSCCo agreed that a minor change was required to tie the P130 legal text into the Code changes being made to give effect to P99, and the appropriate amendment has been made. The other respondent was of the opinion that, for the avoidance of doubt, the legal text should specify that the 'absolute values' of NHH Consumption should be summed. BSCCo does not believe that such a change is required. NHH Export Consumption and NHH Import Consumption values have the same sign. As a consequence, there is no need to specify that the absolute values should be summed. In addition, summing the absolute values would change the way negative meter advances created for the purposes of error correction were handled under PARMS Serial 1. Such a change would fall outside the scope of P130.

The final respondent expressed no opinion on the draft legal text.

## 5.3 Opinion on Proposed Implementation Date

Six of the nine respondents indicated that they supported the proposed Implementation Date for P130 (i.e. 20 January 2004). The general opinion was that the implementation of P130 should be aligned with that of P99, so as to avoid the unnecessary cost of changing BSCP533 twice within a short space of time.

Two respondents indicated that they did not support the proposed Implementation. One did so because of their concerns regarding the legal text (i.e. see point regarding integrating with P99 Code changes in Section 5.2 above), although they recognised aligning implementation with that of P99 would be desirable. These concerns were withdrawn after BSCCo addressed the concerns over the legal text. The other respondent was of the opinion that P130 should be implemented so as to coincide with the date the P81 Code changes take effect – 28 September 2003. BSCCo, however, is still of the opinion that 20 January 2004 would be a more efficient implementation date. First, P130 and P99 both make changes to Annex S-1 of the Code and BSCP 533, therefore it would be more efficient to make them at the same time. Second, whilst the Code changes for P81 are scheduled for implementation on 28 September 2003, the SVAA software development will be implemented on 20 January 2004. As a consequence, between 28 September 2003 and 20 January 2004, NHH Export Consumption will be excluded from Settlement. Therefore, earlier implementation is unnecessary.

The final respondent expressed no opinion on the proposed Implementation Date.



## 5.4 Comments and views of the Panel

The Panel noted that the majority of respondents supported its recommendation that P130 should be made, the proposed Implementation Date of 20 January 2004 and the draft legal text to give effect to P130. As a result, the Panel unanimously confirmed that its provisional recommendation should be made to the Authority.

## 6 SUMMARY OF TRANSMISSION COMPANY ANALYSIS

No analysis was sought.

## 7 SUMMARY OF EXTERNAL ADVICE

No external advice has been sought.

## 8 IMPLEMENTATION APPROACH

On the advice of the BSCCo, the Panel recommends that P130 should be implemented so as to coincide with the implementation of the P81 SVAA software development and the implementation of P99. Therefore, an Implementation Date of 20 January 2004 is recommended, provided an Authority determination is received no later than 1 September 2003.

## 9 DOCUMENT CONTROL

### 9.1 Authorities

Version	Date	Author	Reviewer	Change Reference
0.1	18.06.03	Roger Salomone	Justin Andrews	Draft for Peer Review
0.2	20.06.03	Roger Salomone	BSC Parties	Draft for Consultation
0.3	04.07.03	Roger Salomone	BSC Panel	Final Draft for Decision
1.0	16.07.03	Roger Salomone	Authority	Final Report for Determination

### 9.2 References

Ref	Document	Owner	Issue date	Version
IWA P130	Initial Written Assessment P130	ELEXON	06.06.2003	1.0

**ANNEX 1 LEGAL TEXT**

See attachment 1.

**ANNEX 2 CONSULTATION RESPONSES**

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>	NGT	P130_DR_001	1	0
<b>2.</b>	LE Group	P130_DR_002	9	0
<b>3.</b>	British Gas Trading	P130_DR_003	1	0
<b>4.</b>	Powergen	P130_DR_004	15	0
<b>5.</b>	YEDL/NEDL	P130_DR_005	2	0
<b>6.</b>	IMServ	P130_DR_006	0	1
<b>7.</b>	Npower	P130_DR_007	9	0
<b>8.</b>	Aquila Networks	P130_DR_008	1	0
<b>9.</b>	Scottish Power	P130_DR_009	6	0

**P130\_DR\_001 – NGT**

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

	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
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**

<b>Respondent:</b>	Paul Chesterman
<b>No. of BSC Parties Represented</b>	9
<b>BSC Parties Represented</b>	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,
<b>No. of Non BSC Parties Represented</b>	None that we consider applicable
<b>Non BSC Parties represented</b>	
<b>Role of Respondent</b>	Supplier / Generator / Party Agent / Distribution Business

	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
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 20<sup>th</sup> 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**

<b>Respondent:</b>	Russell Loasby
<b>No. of BSC Parties Represented</b>	15
<b>BSC Parties Represented</b>	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
<b>No. of Non BSC Parties Represented</b>	0
<b>Non BSC Parties represented</b>	N/A
<b>Role of Respondent</b>	Supplier

	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
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**

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

	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
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**

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

	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
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**

<b>Respondent:</b>	<i>Name</i>
<b>No. of BSC Parties Represented</b>	9
<b>BSC Parties Represented</b>	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
<b>No. of Non BSC Parties Represented</b>	None
<b>Non BSC Parties represented</b>	<i>N/A</i>
<b>Role of Respondent</b>	<i>Supplier / Generator / Trader / Consolidator / Exemptable Generator Party Agent</i>

	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
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**

<b>Respondent:</b>	<i>Name</i> John W Russell (SAIC Ltd)
<b>No. of BSC Parties Represented</b>	6
<b>BSC Parties Represented</b>	<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.
<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>	Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent / Interconnector Administrator

	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
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>
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>	