

## Responses from P114 Assessment Consultation

Consultation issued 17 January 2003

Representations were received from the following parties:

No	Company	File Number	No. BSC Parties Represented	No. Non-Parties Represented
1.	Alcan Primary Metal	P114_ASS_001		1
2.	Aquila Networks	P114_ASS_002	1	
3.	British Gas Trading	P114_ASS_003	5	
4.	TXU Europe	P114_ASS_004		1
5.	Scottish and Southern	P114_ASS_005	4	
6.	Scottish Power	P114_ASS_006	6	
7.	LE Group	P114_ASS_007	7	
8.	Summerleaze RE-Generation	P114_ASS_008		1
9.	SEEBOARD	P114_ASS_009	1	
10.	NGC	P114_ASS_010	1	
11.	Powergen	P114_ASS_011	15	
12.	Innogy	P114_ASS_012	9	
13.	British Energy	P114_ASS_013	3	
14.	Slough Energy Supplies	P114_ASS_014	2	2

P114\_ASS\_001 – Alcan Primary Metal

<b>Respondent:</b>	Alcan Primary Metal - Europe
<b>Responding on Behalf of</b>	Alcan Primary Metal – Europe’s Lynemouth smelter and power station (non-party generator)
<b>Role of Respondent</b>	LEG and demand-side provider of Balancing Services

	Question	Response		Rationale
Q1	Overall do you believe that the features, as described within Modification Proposal P114 and the accompanying Requirements Specification, would better facilitate achievement of the applicable BSC Objectives?	<b>Response Yes/No</b>		Improves access to information (and with original access to modifications process) for market participants that are presently excluded
		<b>Proposed</b>	<b>Alternative</b>	
		Yes	Yes	
	<b>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).</b>	<b>Response Yes/No</b>		Will remove the current information asymmetry between Parties and others (including LEGs and demand-side service providers)
		<b>Proposed</b>	<b>Alternative</b>	
		Yes	Yes	
	Objective D- Promoting efficiency in the implementation and administration of the Balancing and Settlement arrangements.	<b>Response Yes/No</b>		Alternative may imposes less administration
		<b>Proposed</b>	<b>Alternative</b>	
			Yes	
Q2	<b>Please specify which solution, as identified in the attached Requirement Specification, best addresses the defect raised by P114?</b>	<b>Tick preferred solution</b>		
	1. Proposed Solution – Licence agreement	Less preferred		
	2. Potential Alternative Solution – Remove confidentiality of all Party reports and publish on BMRS.	Preferred		Not charging for access ensures the widest possible dissemination – thereby removing

					all barriers.
Q3	Do you support the Provision of data to any interested person?			Response Yes/No	Enacts the original intent of the NETA consultations for a transparent market that was not implemented in practice. Long overdue reinstatement of access to information that was available under the Pool and extension to other relevant data.
				Yes	
Q4	Do you have any specific issues with the following Party information (As outlined in Appendix 1 of the requirements Specification) being made available to persons not involved in trading activity? (If yes please specify particular issues)			Response Yes/No No	
	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.	No issue – should be made available	
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	No issue – should be made available	
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.	No issue – should be made available	
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.	No issue – should be made available	
Q5	Do you object to the removal of the confidentiality of any of the following Party information (As outlined in Appendix 1 of the requirements Specification)? (If yes please specify)				
	Settlement Report	SAA-I014	Bid-Offer Data, Acceptance	No	

	(System Operator version)		Data and Trading Charges for each Party. Volumes and Prices for the whole system.		
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	No	
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.	No	
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.	No	
<b>Q6</b>	<b>What are your views on the potential uptake of P114 Proposed licence agreement solution?</b>			<b>Number</b>	
	Number of licensees receiving reports direct from Central Systems?			10	
	Number of licensees receiving pre-processed data via a nominated third party?			30+	Number is like to grow over time with the expansion of distributed generation under Renewables Obligation
<b>Q7</b>	<b>Would the implementation of P114 cause your organisation to remove the Balancing services it offers to the Transmission Company?</b>			<b>Response Yes/No</b>	Balancing Services are provided through SVA, so not directly visible
				No	
<b>Q8</b>	<b>If implemented would your organisation utilise the Proposed licence agreement Solution (subject to contents of such agreement being acceptable)?_(This question only applies to respondents who's organisation is not currently a BSC Party)</b>			<b>Response Yes/No</b>	As a relatively large and active LEG we could probably justify the £3,000 annual fee. Not sure that this would apply to many other LEGs though.  It is critical that licence agreement is not overly restrictive and permits third party processing.

		Yes	
Q9	If implemented would your organisation utilise the potential Alternative Solution by accessing data via the BMRS? (This question only applies to respondents who's organisation is not currently a BSC Party)	Response Yes/No	As a lower cost solution, this is obviously preferable to us.
		Yes	
Q10	Do you have any Further Comments?		One of the principles in the design of NETA was that the market would be open and transparent. This can ONLY be seen to be achieved if all information is available to any interested entity, free of charge on the BMRS

P114\_ASS\_002 – Aquila Networks

Please find that Aquila Networks response to P102 & P114 Assessment Consultations is 'No Comment'.

regards  
Rachael Gardener

Deregulation Control Group &  
Distribution Support Office  
AQUILA NETWORKS

**P114\_ASS\_003 – British Gas Trading**

<b>Respondent:</b>	British Gas Trading (BGT)
<b>Responding on Behalf of</b>	British Gas Trading, Centrica KL Limited, Centrica PB Limited, Accord Energy Limited and Regional Power Generators
<b>Role of Respondent</b>	BSC Party

	<b>Question</b>	<b>Response</b>	<b>Rationale</b>		
<b>Q1</b>	Overall do you believe that the features, as described within Modification Proposal P114 and the accompanying Requirements Specification, would better facilitate achievement of the applicable BSC Objectives?	<p><b>Response</b></p>	<p>BGT is supportive of the principle of increasing the transparency of data that is currently available to all BSC Parties. This data should be available to non-BSC Parties who are directly involved in trading activity, on the basis that it is undertaken in a controlled manner with suitable cost recovery mechanisms and limitation of liability provision. Improving access to data could be seen to increase competition in the purchase and generation of electricity, thereby better facilitating Applicable BSC Objective (c). BGT are unaware why anyone would require access to the data items listed in question 2, who are not directly involved in trading activity. BGT are concerned that if there is no control of this data as is the case with the Alternative Proposal this information could be utilised for commercial gain ie price reporters or damage.</p>		
		<table border="1"> <tr> <td><b>Proposed</b></td> <td><b>Alternative</b></td> </tr> </table>	<b>Proposed</b>	<b>Alternative</b>	
<b>Proposed</b>	<b>Alternative</b>				

		Yes	No	
	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).	Response		The Modification Proposal allows an element of control and the process as it will be managed by ELEXON. Also the Modification Proposal includes provision over the use of the data by introducing confidentiality obligations. Also this method introduces a robust cost recovery mechanism and a limitation of liability clause.
		Proposed	Alternative	
		Yes	No	
	Objective D- Promoting efficiency in the implementation and administration of the Balancing and Settlement arrangements.	Response		Both the Modification Proposal and the Alternative are looking to improve the visibility of data. BGT do not believe that increasing transparency and providing greater visibility of the data items contained in question 2 will better promote efficiency in the administration and implementation of the Balancing and Settlement arrangements.
		Proposed	Alternative	
		No	No	
Q2	Please specify which solution, as identified in the attached Requirement Specification, best addresses the defect raised by P114?	Tick preferred solution		
	3. Proposed Solution – Licence agreement	Yes		
	4. Potential Alternative Solution – Remove confidentiality of all Party reports and publish on BMRS.	No		
Q3	Do you support the Provision of data to any interested person?	Response		BGT are however supportive of the provision of data that is currently available to BSC Parties to any parties who are directly involved in trading activity within the electricity market.
		No		



<b>Q4</b>	<b>Do you have any specific issues with the following Party information (As outlined in Appendix 1 of the requirements Specification) being made available to persons not involved in trading activity? (If yes please specify particular issues)</b>			<b>Response</b> <b>Yes</b>	
	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.	<b>Yes</b>	Whilst BGT realise the value and importance of making data transparent we are unsure why a counterpart not involved in trading activity would require the data identified. BGT support this data being made available to non BSC Parties who are directly involved in trading activities via a Licence Agreement as they are using the data to support their trading activity.
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	<b>Yes</b>	See above
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.	<b>Yes</b>	See above
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.	<b>Yes</b>	See above
<b>Q5</b>	<b>Do you object to the removal of the confidentiality of any of the following Party information (As outlined in Appendix 1 of the requirements Specification)? (If yes please specify)</b>				
	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.	<b>Yes</b>	See above

	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	Yes	See above
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.	Yes	See above
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.	Yes	See above
<b>Q6</b>	<b>What are your views on the potential uptake of P114 Proposed licence agreement solution?</b>			<b>Number</b>	
	Number of licensees receiving reports direct from Central Systems?				BGT believe the uptake of data directly from Central Systems will be minimal. Due to the volume of data available and the costs associated with manipulating the data to remove the data items that are not required.
	Number of licensees receiving pre-processed data via a nominated third party?				BGT perceive this will be the preferred option for LEGs who decide to become licensees. The data can be manipulated into specific reports and thus dispensing with any unwanted data. Despite this BGT still expect any uptake to be limited.
<b>Q7</b>	<b>Would the implementation of P114 cause your organisation to remove the Balancing services it offers to the Transmission Company?</b>			<b>Response</b>	
				<b>No</b>	
<b>Q8</b>	<b>If implemented would your organisation utilise the Proposed licence agreement Solution (subject to contents of such agreement being acceptable)?_(This question only applies to respondents who's organisation is not currently a BSC Party)</b>			<b>Response</b> <b>N/A</b>	

Q9	If implemented would your organisation utilise the potential Alternative Solution by accessing data via the BMRS? (This question only applies to respondents who's organisation is not currently a BSC Party)	Response	
		N/A	
Q10	Do you have any Further Comments?	No	

P114\_ASS\_004 – TXU Europe

<b>Respondent:</b>	Philip Russell
<b>Responding on Behalf of</b>	
<b>Role of Respondent</b>	

	Question	Response		Rationale
Q1	Overall do you believe that the features, as described within Modification Proposal P114 and the accompanying Requirements Specification, would better facilitate achievement of the applicable BSC Objectives?			
	<b>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).</b>	<b>Proposed</b>	<b>Alternative</b>	Yes
	Objective D- Promoting efficiency in the implementation and administration of the Balancing and Settlement arrangements.	<b>Response Yes/No</b>		
<b>Proposed</b>		<b>Alternative</b>		
		Yes		

Q2	Please specify which solution, as identified in the attached Requirement Specification, best addresses the defect raised by P114?	Tick preferred solution	
	5. Proposed Solution – Licence agreement		Depending on how the Licence Agreement is interpreted this route would effectively restrict the parties to whom information could be provided.
	6. Potential Alternative Solution – Remove confidentiality of all Party reports and publish on BMRS.	X	This would effectively widen the number of interested parties to whom information could be provided and hence lower the likely cost for providing such a service. Given the size and frequency of the data files that have to be received, processed and distributed it seems more likely that the objective of the Mod proposal would achieved through this route. Given that each Party's trading data is available to its competitors it is not obvious what purpose the confidentiality clause serves.
Q3	Do you support the Provision of data to any interested person?	Yes	

Q4	Do you have any specific issues with the following Party information (As outlined in Appendix 1 of the requirements Specification) being made available to persons not involved in trading activity? (If yes please specify particular issues)			Response	
	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.		
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.		
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.		
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.		
Q5	Do you object to the removal of the confidentiality of any of the following Party information (As outlined in Appendix 1 of the requirements Specification)? (If yes please specify)				
	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.		
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.		

	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.		
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.		
Q6	<b>What are your views on the potential uptake of P114 Proposed licence agreement solution?</b>			<b>Number</b>	
	Number of licensees receiving reports direct from Central Systems?				
	Number of licensees receiving pre-processed data via a nominated third party?				
Q7	<b>Would the implementation of P114 cause your organisation to remove the Balancing services it offers to the Transmission Company?</b>			<b>Yes/No</b>	
Q8	<b>If implemented would your organisation utilise the Proposed licence agreement Solution (subject to contents of such agreement being acceptable)?_(This question only applies to respondents who's organisation is not currently a BSC Party)</b>			<b>Yes/No</b>	
Q9	<b>If implemented would your organisation utilise the potential Alternative Solution by accessing data via the BMRS? (This question only applies to respondents who's organisation is not currently a BSC Party)</b>			<b>Yes/No</b>	
Q10	<b>Do you have any Further Comments?</b>				

## P114\_ASS\_005 – Scottish and Southern

This response is sent on behalf of Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd. and SSE Energy Supply Ltd.

In relation to the eight questions applicable to BSC Parties listed in the Consultation Paper, contained within your note of 17th January 2003 concerning Modification Proposals P114, we have the following comments to make:-

Q1 Overall do you believe that the features, as described within Modification Proposal P114 and the accompanying Requirements Specification, would better facilitate achievement of the applicable BSC Objectives?

In respect of Modification Proposal P114 we do not agree with the premise behind it, namely that there is a defect that requires rectification. No explanation or sound justification has been made by the Proposer as to why such information is required or how it would better facilitate the achievement of the BSC Objectives or promote competition.

We have concerns that Modification Proposal P114 would create a precedent which would allow subsets of trading arrangements to be created and applied to categories of Parties, excluding them from certain obligations and allowing them to be treated differently. This would introduce discrimination in favour of some Parties at the 'expense' of other Parties. This would generally dilute the effectiveness of the Code. We note that NETA was designed to ensure equal treatment and transparency for all Parties. Modification Proposal P114 runs counter to this and can not, therefore, be described as better facilitating the achievement of any BSC Objective.

Q2 Please specify which solution, as identified in the attached Requirement Specification, best addresses the defect raised by P114?

As indicated in Q1 above, we do not agree with the premise behind P114, namely that there is a defect that requires rectification. No explanation or sound justification has been made by the Proposer as to why such information is required or how it would better facilitate the achievement of the BSC Objectives or promote competition. Of the two suggested options (for a solution to a problem we do not believe exists), subject to confidentiality being maintained and full cost recover being placed on non-trading parties, the Licence Agreement approach seems the most suitable.

Q3 Do you support the Provision of data to any interested person?

No. There are over 40 million persons in the England and Wales marketplace and certain information is made available to them via the website. We believe that the Provision of data should not be made available to persons not involved in trading activities.



Q4 Do you have any specific issues with the following Party information (As outlined in Appendix 1 of the requirements Specification) being made available to persons not involved in trading activity? (If yes please specify particular issues)

Yes. As indicated in Q1 above, we do not agree with Modification Proposal P114 and see no reason why any of the information listed in this question should be made available to non trading persons.

Settlement Report (System Operator version) - Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system. Yes. As indicated in Q1 above, we do not agree with Modification Proposal P114 and see no reason why any of the information listed in this question should be made available to non trading persons.

Aggregated Data Report - Metered Volumes for each BM Unit, Interconnector or GSP Group.

Yes. As indicated in Q1 above, we do not agree with Modification Proposal P114 and see no reason why any of the information listed in this question should be made available to non trading persons.

Meter Period Data Report - Metered Volumes for all Distribution Systems Connection Points.

Yes. As indicated in Q1 above, we do not agree with Modification Proposal P114 and see no reason why any of the information listed in this question should be made available to non trading persons.

Total Gross Demand per GSP - Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.

Yes. As indicated in Q1 above, we do not agree with Modification Proposal P114 and see no reason why any of the information listed in this question should be made available to non trading persons.

Q5 Do you object to the removal of the confidentiality of any of the following Party information (As outlined in Appendix 1 of the requirements Specification)?

(If yes please specify)

Yes. As indicated in Q1 above, we do not agree with Modification Proposal P114 and see no reason why any of the information listed in this question should be made available to non trading persons.

Settlement Report (System Operator version) - Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system. Yes. As indicated in Q1 above, we do not agree with Modification Proposal P114 and see no reason why any of the information listed in this question should be made available to non trading persons.

Aggregated Data Report - Metered Volumes for each BM Unit, Interconnector or GSP Group.

Yes. As indicated in Q1 above, we do not agree with Modification Proposal P114 and see no reason why any of the information listed in this question should be made available to non trading persons.

Meter Period Data Report - Metered Volumes for all Distribution Systems Connection Points.

Yes. As indicated in Q1 above, we do not agree with Modification Proposal P114 and see no reason why any of the information listed in this question should be made available to non trading persons.

Total Gross Demand per GSP - Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.

Yes. As indicated in Q1 above, we do not agree with Modification Proposal P114 and see no reason why any of the information listed in this question should be made available to non trading persons.

Q6 What are your views on the potential uptake of P114 Proposed licence agreement solution?

We have no particular views on the number likely to take up this option, either directly or via third parties.

Q7 Would the implementation of P114 cause your organisation to remove the Balancing services it offers to the Transmission Company?

As indicated in our response to Q5 in the associated P102 Consultation Paper (contained within your note of 17th January 2003 that accompanied this P114 Consultation Paper) "Do you think the implementation of P102 would cause a reduction of the Balancing services offered to the Transmission Company?"; we believe it may be possible. It is the opinion of those parties providing demand side 'services' that should be specifically consulted on the likely impact.

Q8 [Not applicable as we are a BSC Party.]

Q9 [Not applicable as we are a BSC Party.]

Q10 Do you have any Further Comments?

We maintain our view that Party Information should not be made available to persons not involved in trading activities.

We are very mindful that NETA stands for the New Electricity TRADING Arrangements. As such it is designed to meet the requirements of Trading. There are numerous potential non-trading parties. The arrangements are not designed for them, they are designed for those who freely choose to join up to the Code. Non-trading parties are not compelled to join. However, where they freely choose to join then they do so in the knowledge that rights, obligations and costs flow from their decision (to join). This approach avoids frivolous participation.

Furthermore, for the avoidance of doubt, we strongly agree with the comments in Section 6.1.1 of the associated P102 Consultation Paper (contained within your note of 17th January 2003 that accompanied this P114 Consultation Paper) concerning the suggested ability of non parties to raise Modifications. There is a considerable cost involved in the actual handling of Modifications involving work by Elexon, the Panel and market participants. In addition to this there is the potentially significant costs associated with implementing the change itself. We note, for example, the costs identified in the recent P98 consultation of between £1.4M and £1.75M. We therefore agree that (a) "there are existing methods whereby non-Parties can submit Modification Proposals"; (b) that there are very serious issues around allowing non-trading Parties "to submit proposals that affect a market in which they are not directly involved"; and, (c) that "costs of the Modification process are mainly recovered from trading parties"; and for these reasons non-trading Parties should NOT be permitted any additional rights (beyond the existing rights) to raise Modification Proposal.

Regards

Garth Graham  
Scottish and Southern Energy plc

P114\_ASS\_006 – Scottish Power

<b>Respondent:</b>	Man Kwong Liu
<b>Responding on Behalf of</b>	<i>Please list all Parties/non-Parties responding on behalf of (including the respondent company if relevant).</i> Scottish Power UK plc; ScottishPower Energy Trading Ltd.; Scottish Power Generation plc; ScottishPower Energy Retail Ltd.; SP Transmission plc; SP Manweb plc.
<b>Role of Respondent</b>	<i>BSC Party/ LEG /Directly connected Customer/ Other (Please specify)</i> BSC Party

	Question	Response		Rationale
Q1	Overall do you believe that the features, as described within Modification Proposal P114 and the accompanying Requirements Specification, would better facilitate achievement of the applicable BSC Objectives?	<b>Response Yes/No</b>		See comments below.
		<b>Proposed</b>	<b>Alternative</b>	
		Yes	No	

**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).**

**Response Yes/No**

**Proposed**

**Alternative**

We have issues with confidentiality and cost involved on P114 as in P102. Provided these are dealt with, then by allowing other non trading parties to access the information and therefore encourage participation potentially promote effective competition. However, we believe that the provision of these reports, involving as it does some amendment to the existing systems in order for non-Trading interested parties to gain access to it, must be paid for in a cost-reflective manner. As we are seeking a least-cost solution, with the bulk of costs met by non-Trading parties taking up the opportunity to access these reports, it would be preferable if, as outlined in the Requirements Specification, changes to implement are carried out as part of a BSC Release which brings the costs down considerably. If this proves not to be the case, there would have to be an increase in the fee charged for take up from the £3000 per annum suggested to ensure that costs are suitably apportioned. The likely uptake would depend on the cost of this privilege, which we believe should be cover the likely expense of implementing and maintaining this change,

		Yes	No	
	Objective D- Promoting efficiency in the implementation and administration of the Balancing and Settlement arrangements.	<b>Response Yes/No</b> <b>Proposed</b> <b>Alternative</b> No                      No		We cannot understand how by creating another status especially for LEG/other non-trading parties and hence complication in the system can be more efficient in the implementation and administration of the BSC.
<b>Q2</b>	<b>Please specify which solution, as identified in the attached Requirement Specification, best addresses the defect raised by P114?</b>	<b>Tick preferred solution</b>		
	7. Proposed Solution – Licence agreement	✓		While we have no objection for non trading parties to receive BSC data, especially if the parties requesting the information pay for it and it does not impact our systems and processes. However, we believe that the provision of these reports, involving as it does some amendment to the existing systems in order for non-Trading interested parties to gain access to it, must be paid for in a cost-reflective manner. As we are seeking a least-cost solution, with the bulk of costs met by non-Trading parties taking up the opportunity to access these reports, it would be preferable if, as outlined in the Requirements Specification, changes to implement are carried out as part of a BSC Release which brings the costs down considerably. If this proves not to be the case, there would have to be an increase in the fee charged for take up from the £3000 per annum suggested to ensure that costs

				are suitably apportioned.
	8. Potential Alternative Solution – Remove confidentiality of all Party reports and publish on BMRS.			
Q3	Do you support the Provision of data to any interested person?			Response Yes/No
				Yes
				So long as they are willing to comply with the requirements of the Licensing agreement, which should be drawn up to ensure adequate protection to BSC Trading parties regarding any confidential aspects of the reported data. Also see our response to Qu.2 concerning cost.
Q4	Do you have any specific issues with the following Party information (As outlined in Appendix 1 of the requirements Specification) being made available to persons not involved in trading activity? (If yes please specify particular issues)			Response Yes/No
	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.	Yes
				The information outlined is highly detailed information covering each BM unit and party participating in the NETA market. A large amount of this information is available through BMReports.com and this should be sufficient for parties not actively involved in trading. How the settlement process of each BM unit and party changes through the different reconciliation runs should only be of interest to those parties managing

					settlement and not those outwith. Therefore, our response is that settlement flow and metered volume information is only required for settlement purposes and its availability should be restricted as such.
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	Yes	See comments above.
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.	No	
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.	No	
Q5	<b>Do you object to the removal of the confidentiality of any of the following Party information (As outlined in Appendix 1 of the requirements Specification)? (If yes please specify)</b>				
	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.	Yes	The information outlined is highly detailed information covering each BM unit and party participating in the NETA market. A large amount of this information is available through BMRports.com and this should be sufficient for parties not actively involved in trading. How the settlement process of each BM unit and party changes through the different reconciliation runs should only be of interest to those parties managing settlement and not those outwith. Therefore, our response is that settlement flow and metered volume information is only



					required for settlement purposes and its availability should be restricted as such.
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	Yes	See comments above.
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.	No	
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.	No	
<b>Q6</b>	<b>What are your views on the potential uptake of P114 Proposed licence agreement solution?</b>			<b>Number</b>	

	Number of licensees receiving reports direct from Central Systems?		<p>We do not have a view on the likely uptake of this proposal. However, we believe that the provision of these reports, involving as it does some amendment to the existing systems in order for non-Trading interested parties to gain access to it, must be paid for in a cost-reflective manner. As we are seeking a least-cost solution, with the bulk of costs met by non-Trading parties taking up the opportunity to access these reports, it would be preferable if, as outlined in the Requirements Specification, changes to implement are carried out as part of a BSC Release which brings the costs down considerably. If this proves not to be the case, there would have to be an increase in the fee charged for take up from the £3000 per annum suggested to ensure that costs are suitably apportioned. The likely uptake would depend on the cost of this privilege, which we believe should be cover the likely expense of implementing and maintaining this change,</p>
	Number of licensees receiving pre-processed data via a nominated third party?		See our comments above.

Q7	Would the implementation of P114 cause your organisation to remove the Balancing services it offers to the Transmission Company?	Response Yes/No	We are not aware of any significant issues with the provision of Balancing Services to the Transmission Company, which would be impacted by P114. This is provided of course that appropriate confidentiality requirements are met by those using the reported data and these must be reflected in the Licensing agreement.
		No	
Q8	If implemented would your organisation utilise the Proposed licence agreement Solution (subject to contents of such agreement being acceptable)?_(This question only applies to respondents who's organisation is not currently a BSC Party)	Response Yes/No	
		N/A	
Q9	If implemented would your organisation utilise the potential Alternative Solution by accessing data via the BMRS? (This question only applies to respondents who's organisation is not currently a BSC Party)	Response Yes/No	
		N/A	
Q10	Do you have any Further Comments?		None.

P114\_ASS\_007 – LE Group

<b>Respondent:</b>	Tony Diccico
<b>Responding on Behalf of</b>	LE Group (EPN Distribution Ltd, London Electricity plc, London Electricity Group plc, Jade Power Generation Ltd, London Power Networks plc, Sutton Bridge Power, West Burton Ltd)
<b>Role of Respondent</b>	BSC Party

	Question	Response		Rationale
Q1	Overall do you believe that the features, as described within Modification Proposal P114 and the accompanying Requirements Specification, would better facilitate achievement of the applicable BSC Objectives?	<b>Response Yes/No</b>		The proposed modification better facilitates Objectives C and D whereas the alternative modification does not better facilitate any objective. See below for detail.
		<b>Proposed</b>	<b>Alternative</b>	
		<b>Yes</b>	<b>No</b>	
	<b>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).</b>	<b>Response Yes/No</b>		Symmetrical provision of data to market participants is desirable and promotes competition. However the alternative modification may dissuade demand sites from offering balancing services in the Balancing Mechanism as their data will be available to competitors and the alternative modification proposal provides no mechanism for identifying who has accessed the data. The alternative therefore provides no method for enforcing confidentiality obligations and restrictions on the use of the data which would provide protection against its misuse.
		<b>Proposed</b>	<b>Alternative</b>	
		<b>Yes</b>	<b>No</b>	

	Objective D- Promoting efficiency in the implementation and administration of the Balancing and Settlement arrangements.	<b>Response Yes/No</b>		The proposed modification has a clear, targeted mechanism for recovering the costs incurred in producing and distributing this data to LEGs and other non-trading parties. The alternative modification provides no clear, targeted mechanism for recovering the costs associated with placing daily files on a website and any upgrades to this website associated with increased usage and the significant volumes of data that will need to be stored and therefore does not better facilitate Objective D. In addition the enforcement of confidentiality obligations will not be possible under the alternative modification in which any person can download the data from the website. This inability to enforce the confidentiality obligation also does not better facilitate Objective D.
		<b>Proposed</b>	<b>Alternative</b>	
		<b>Yes</b>	<b>No</b>	
<b>Q2</b>	<b>Please specify which solution, as identified in the attached Requirement Specification, best addresses the defect raised by P114?</b>	<b>Tick preferred solution</b>		
	9. Proposed Solution – Licence agreement	<b>Preferred</b>		
	10. Potential Alternative Solution – Remove confidentiality of all Party reports and publish on BMRS.			

Q3	Do you support the Provision of data to any interested person?			Response Yes / No	Data should only be supplied to persons for purposes related to the supply and generation of electricity in the United Kingdom and no other as per the current confidentiality obligations placed on BSC Parties. It should not be freely available to any interested person.
				No	
Q4	Do you have any specific issues with the following Party information (As outlined in Appendix 1 of the requirements Specification) being made available to persons not involved in trading activity? (If yes please specify particular issues)			Response Yes/No	
	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.	Yes	Data should only be used for purposes related to the supply and generation of electricity in the United Kingdom as per the current confidentiality obligations placed on BSC Parties. We do not believe that the confidentiality obligation that will be placed on the website under the alternative modification is enforceable.
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	Yes	As above
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.	Yes	As above
	Total Gross	CDCA-I029	Aggregated meter flows for	Yes	As above

	Demand per GSP		each Grid Supply Point in each GSP Group per Settlement Period.		
<b>Q5</b>	<b>Do you object to the removal of the confidentiality of any of the following Party information (As outlined in Appendix 1 of the requirements Specification)? (If yes please specify)</b>				
	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.	<b>Yes</b>	Data should only be available to those persons / parties who have contributed to the cost of its production and distribution.
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	<b>Yes</b>	As above
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.	<b>Yes</b>	As above
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.	<b>Yes</b>	As above
<b>Q6</b>	<b>What are your views on the potential uptake of P114 Proposed licence agreement solution?</b>			<b>Number</b>	
	Number of licensees receiving reports direct from Central Systems?			Limited	
	Number of licensees receiving pre-processed data via a nominated third party?			Limited	
<b>Q7</b>	<b>Would the implementation of P114 cause your organisation to remove the Balancing services it offers to the Transmission Company?</b>			<b>Response Yes/No</b>	

		No	
Q8	If implemented would your organisation utilise the Proposed licence agreement Solution (subject to contents of such agreement being acceptable)?_(This question only applies to respondents who's organisation is not currently a BSC Party)	Response Yes/No	
		Not applicable	
Q9	If implemented would your organisation utilise the potential Alternative Solution by accessing data via the BMRS? (This question only applies to respondents who's organisation is not currently a BSC Party)	Response Yes/No	
		Not applicable	
Q10	Do you have any Further Comments?		



**P114\_ASS\_008 – Summerlease RE-Generation**

**Guidance re P102/P114 Assessment Consultation**

**Q1. Will the proposed modification better facilitate the BSC Objective of promoting effective competition?**

Yes I believe the proposal will assist LEGs in their negotiations with potential counterparties.

**And of promoting efficiency in the implementation and administration of Balancing and settlement arrangements?**

An increase in efficiency would be achieved from a better understanding amongst LEGs of the Balancing and Settlement arrangements.

**Q2. Do you have any specific issues about the information listed in this question being available to non trading persons?**

No.

**Q3. What are your views on the likely uptake of the facility to obtain the licensed data?**

Whilst it may not be possible to use the raw data from Central Systems directly, receipt of the data as processed by a third party would be valuable.

**Q4. What are your views on the uptake of P102/P114, if in the form of enabling LEGs to become BSC Parties without trading?**

As above

**Q5. Would the implementation of P102/P114 cause a reduction in Balancing Services?**

No

**Q6. Would your organisation utilize the proposed solution?**

We would use the service from time to time as we saw appropriate.

**Q7. Further comments**

None

P114\_ASS\_009 – SEEBOARD

<b>Respondent:</b>	Dave Morton
<b>Responding on Behalf of</b>	SEEBAORD Energy Limited
<b>Role of Respondent</b>	BSC Party

	Question	Response		Rationale
Q1	Overall do you believe that the features, as described within Modification Proposal P114 and the accompanying Requirements Specification, would better facilitate achievement of the applicable BSC Objectives?	<b>Response Yes/No</b>		Original is an extension of P102 alternate, which we also support. We assume that any request for such a licence will contain relevant information as to why data is required. Alternate could lead to problems with data access and as such we feel would not better facilitate BSC objectives.
		<b>Proposed</b>	<b>Alternative</b>	
		Yes	No	
	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).	<b>Response Yes/No</b>		Alternative provides no mechanism for policing information and as such could lead problems with misuse. As such we do not see this as better facilitating this objective.
		<b>Proposed</b>	<b>Alternative</b>	
		Yes	No	
	Objective D- Promoting efficiency in the implementation and administration of the Balancing and Settlement arrangements.	<b>Response Yes/No</b>		See above.
		<b>Proposed</b>	<b>Alternative</b>	
		Yes	No	

<b>Q2</b>	<b>Please specify which solution, as identified in the attached Requirement Specification, best addresses the defect raised by P114?</b>			Tick preferred solution	We do not feel that this modification is required.
	11. Proposed Solution – Licence agreement				
	12. Potential Alternative Solution – Remove confidentiality of all Party reports and publish on BMRS.				
<b>Q3</b>	<b>Do you support the Provision of data to any interested person?</b>			Response Yes/No	If a person has no real interest in ability to sell or buy energy then we see no reason for them to have this data. Apart from LEGs we see no convincing case made by any other parties for this data.
				No	
<b>Q4</b>	<b>Do you have any specific issues with the following Party information (As outlined in Appendix 1 of the requirements Specification) being made available to persons not involved in trading activity? (If yes please specify particular issues)</b>			Response Yes/No	See question 3.
	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.	Yes	
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	Yes	
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.	Yes	

	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.	Yes	
Q5	<b>Do you object to the removal of the confidentiality of any of the following Party information (As outlined in Appendix 1 of the requirements Specification)? (If yes please specify)</b>				See question 3.
	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.	Yes	
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	Yes	
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.	Yes	
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.	Yes	
Q6	<b>What are your views on the potential uptake of P114 Proposed licence agreement solution?</b>			Number	No views.
	Number of licensees receiving reports direct from Central Systems?				
	Number of licensees receiving pre-processed data via a nominated third party?				
Q7	<b>Would the implementation of P114 cause your organisation to remove the Balancing services it offers to the Transmission Company?</b>			Response Yes/No	

		No	
Q8	If implemented would your organisation utilise the Proposed licence agreement Solution (subject to contents of such agreement being acceptable)?_(This question only applies to respondents who's organisation is not currently a BSC Party)	Response Yes/No	
Q9	If implemented would your organisation utilise the potential Alternative Solution by accessing data via the BMRS? (This question only applies to respondents who's organisation is not currently a BSC Party)	Response Yes/No	
Q10	Do you have any Further Comments?		

P114\_ASS\_010 – NGC

<b>Respondent:</b>	Name <i>National Grid</i>
<b>Responding on Behalf of</b>	Please list all Parties/non-Parties responding on behalf of (including the respondent company if relevant). <i>National Grid</i>
<b>Role of Respondent</b>	BSC Party/ LEG /Directly connected Customer/ Other (Please specify) <i>BSC Party</i>

	Question	Response		Rationale
Q1	Overall do you believe that the features, as described within Modification Proposal P114 and the accompanying Requirements Specification, would better facilitate achievement of the applicable BSC Objectives?	Response Yes/No		We believe that the proposed solution better meets the BSC Objectives. However the Alternative solution may promote objective (c) but is outweighed by not facilitating objective (d) and hence we would not support its inclusion in the Assessment Report
		Proposed	Alternative	
		Yes	No	
	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).	Response Yes/No		
		Proposed	Alternative	
		Yes	Yes	

	Objective D- Promoting efficiency in the implementation and administration of the Balancing and Settlement arrangements.		Response Yes/No	Whilst the Alternative may seem "cheap and easy" to implement, the effect would leave Elexon in the unenviable position of administrating a 'Public information service' with no limit on requests or obligations on cost recovery.	
			Proposed	Alternative	
			Yes	No	
Q2	Please specify which solution, as identified in the attached Requirement Specification, best addresses the defect raised by P114?		Tick preferred solution		
	13. Proposed Solution – Licence agreement		✓		
	14. Potential Alternative Solution – Remove confidentiality of all Party reports and publish on BMRS.				
Q3	Do you support the Provision of data to any interested person?		Response Yes/No	In principle we support the provision of data to any interested person subject to commercial confidentiality and the cost of making the data available.	
			Yes (with caveats)		
Q4	Do you have any specific issues with the following Party information (As outlined in Appendix 1 of the requirements Specification) being made available to persons not involved in trading activity? (If yes please specify particular issues)		Response Yes/No		
	Settlement Report	SAA-I014	Bid-Offer Data, Acceptance	Yes	We have concerns that third parties



	(System Operator version)		Data and Trading Charges for each Party. Volumes and Prices for the whole system.		(not directly involved in trading) may wish to seek commercial gain from this data but believe our concerns are addressed through a licensing agreement.
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	No	
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.	No	
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.	No	
<b>Q5</b>	<b>Do you object to the removal of the confidentiality of any of the following Party information (As outlined in Appendix 1 of the requirements Specification)? (If yes please specify)</b>				
	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.	Yes	We do not see the value of this data to non-market participants and hence do not support the costs involved in making it available.
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	Yes	See above
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems	Yes	See above

			Connection Points.		
	Total Gross Demand per GSP	CDCA-1029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.	Yes	See above
<b>Q6</b>	<b>What are your views on the potential uptake of P114 Proposed licence agreement solution?</b>			<b>Number</b>	
	Number of licensees receiving reports direct from Central Systems?			< 10	<b>Based upon the number of non-trading parties active in the market arrangements</b>
	Number of licensees receiving pre-processed data via a nominated third party?			< 10	
<b>Q7</b>	<b>Would the implementation of P114 cause your organisation to remove the Balancing services it offers to the Transmission Company?</b>			<b>Response Yes/No</b>	
				N/A	
<b>Q8</b>	<b>If implemented would your organisation utilise the Proposed licence agreement Solution (subject to contents of such agreement being acceptable)?_(This question only applies to respondents who's organisation is not currently a BSC Party)</b>			<b>Response Yes/No</b>	
				N/A	
<b>Q9</b>	<b>If implemented would your organisation utilise the potential Alternative Solution by accessing data via the BMRS? (This question only applies to respondents who's organisation is not currently a BSC Party)</b>			<b>Response Yes/No</b>	
				N/A	
<b>Q10</b>	<b>Do you have any Further Comments?</b>			Yes	We note that no Transmission Company analysis has been requested for P114.

P114\_ASS\_011 – Powergen

<b>Respondent:</b>	Powergen UK plc
<b>Responding on Behalf of</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>Role of Respondent</b>	BSC Party

	Question	Response		Rationale
Q1	Overall do you believe that the features, as described within Modification Proposal P114 and the accompanying Requirements Specification, would better facilitate achievement of the applicable BSC Objectives?	<b>Response Yes/No</b>		The proposed route allows confidentiality issues and cost recovery to be addressed. The alternative perhaps removes the confidentiality issue, although those customers whose data would be made more widely available without their express permission may disagree. However, the alternative route would not allow the costs of providing the service to be recovered from those using it. Therefore, BSC Parties who are on the whole unlikely to use the service will subsidise the service for those who do use it.
		<b>Proposed</b>	<b>Alternative</b>	

		Yes.	No.	
	<b>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).</b>	<b>Response Yes/No</b>		For the alternative, as BSC Parties would be funding the service for others to use, this would represent a subsidisation of a service for others. This would be detrimental to competition as costs would not fall to those who incurred them.
		<b>Proposed</b>	<b>Alternative</b>	
		Yes.	No.	
	Objective D- Promoting efficiency in the implementation and administration of the Balancing and Settlement arrangements.	<b>Response Yes/No</b>		Neither option improves the efficiency of the arrangements. The proposed option is probably neutral whilst the second has the potential to reduce the efficiency as the costs of data provision will not be borne by those who cause them. Therefore, there is no economic incentive for persons to keep use of the system to a reasonable level.
		<b>Proposed</b>	<b>Alternative</b>	
		No.	No.	
<b>Q2</b>	<b>Please specify which solution, as identified in the attached Requirement Specification, best addresses the defect raised by P114?</b>	<b>Tick preferred solution</b>		
	15. Proposed Solution – Licence agreement	✓		See comments above.
	16. Potential Alternative Solution – Remove confidentiality of all Party reports and publish on BMRS.			See comments above.
<b>Q3</b>	<b>Do you support the Provision of data to any interested person?</b>	<b>Response Yes/No</b>		Subject to them using it for electricity trading purposes only, to cover the confidentiality issue in relation to directly connected customers.
		Yes		

<b>Q4</b>	<b>Do you have any specific issues with the following Party information (As outlined in Appendix 1 of the requirements Specification) being made available to persons not involved in trading activity? (If yes please specify particular issues)</b>			<b>Response Yes/No</b>	
	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.	<b>No.</b>	
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	<b>Yes.</b>	This would provide information on the consumption patterns of directly connected customers due to the requirement for them to be in a separate BMU. If the proposed licence agreement contained a requirement to use it for trading purposes only, as is required for Parties, then we would not be opposed to its release.
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.	<b>No.</b>	
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.	<b>No.</b>	
<b>Q5</b>	<b>Do you object to the removal of the confidentiality of any of the following Party information (As outlined in Appendix 1 of the requirements Specification)? (If yes please specify)</b>				

	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.	<b>Yes.</b>	Only due to lack of appropriate cost recovery.
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	<b>Yes.</b>	Due to lack of cost recovery from those using it. Additionally, this would provide information on the consumption patterns of directly connected customers due to the requirement for them to be in a separate BMU. There would be less protection than afforded by the proposed solution.
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.	<b>Yes.</b>	Only due to lack of appropriate cost recovery.
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.	<b>Yes.</b>	Only due to lack of appropriate cost recovery.
<b>Q6</b>	<b>What are your views on the potential uptake of P114 Proposed licence agreement solution?</b>			<b>Number</b>	
	Number of licensees receiving reports direct from Central Systems?			Don't know.	
	Number of licensees receiving pre-processed data via a nominated third party?			Don't know.	
<b>Q7</b>	<b>Would the implementation of P114 cause your organisation to remove the Balancing services it offers to the Transmission Company?</b>			<b>Response Yes/No</b>	
				<b>No.</b>	

Q8	If implemented would your organisation utilise the Proposed licence agreement Solution (subject to contents of such agreement being acceptable)?_(This question only applies to respondents who's organisation is not currently a BSC Party)	Response Yes/No	
		N/A	
Q9	If implemented would your organisation utilise the potential Alternative Solution by accessing data via the BMRS? (This question only applies to respondents who's organisation is not currently a BSC Party)	Response Yes/No	
		N/A	
Q10	Do you have any Further Comments?	No.	

P114\_ASS\_012 – Innogy

<b>Respondent:</b>	Ben Willis
<b>Responding on Behalf of</b>	Innogy plc, Innogy Cogen Ltd, Innogy Cogen Trading Ltd, Npower Ltd, Npower Direct Ltd, Npower Yorkshire Ltd, Npower Northern Ltd, Npower Yorkshire Supply Ltd, Npower Northern Supply Ltd.
<b>Role of Respondent</b>	BSC Party

	Question	Response		Rationale
Q1	Overall do you believe that the features, as described within Modification Proposal P114 and the accompanying Requirements Specification, would better facilitate achievement of the applicable BSC Objectives?	<b>Response Yes/No</b>		We believe that the proposed solution fulfils the BSC Objectives better than the Alternative, since it goes partly to addressing the cost-recovery aspect of the modification, whereas the Alternative clearly forces Parties to subsidise the provision of data to non-Parties.
		<b>Proposed</b>	<b>Alternative</b>	
		<b>Y</b>	<b>N</b>	
	<b>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).</b>	<b>Response Yes/No</b>		Whilst we agree that increased transparency will promote competition, we have concerns over the widespread publication of potentially confidential customer metered data. This will occur for directly customers and sites that have been allocated to a specific BM Unit.
		<b>Proposed</b>	<b>Alternative</b>	
		<b>Y</b>	<b>Y</b>	



	Objective D- Promoting efficiency in the implementation and administration of the Balancing and Settlement arrangements.			<b>Response Yes/No</b>		We still have concerns over the level of the annual fee within the Licence Agreement, and feel that there is the potential for those benefiting from access to the data not being responsible for the costs of providing that data.
				<b>Proposed</b>	<b>Alternative</b>	
				<b>N</b>	<b>N</b>	
<b>Q2</b>	<b>Please specify which solution, as identified in the attached Requirement Specification, best addresses the defect raised by P114?</b>			<b>Tick preferred solution</b>		
	17. Proposed Solution – Licence agreement			✓		Implementation through a Licence Agreement will at least partially recover the costs of data provision, and target those costs against those who utilise the data.
	18. Potential Alternative Solution – Remove confidentiality of all Party reports and publish on BMRS.					Publication on the BMRS is purely an implementation route, and does not per se exclude the Licence Agreement route
<b>Q3</b>	<b>Do you support the Provision of data to any interested person?</b>			<b>Response Yes/No</b>		Providing the relevant agreements are in place
				Y		
<b>Q4</b>	<b>Do you have any specific issues with the following Party information (As outlined in Appendix 1 of the requirements Specification) being made available to persons not involved in trading activity? (If yes please specify particular issues)</b>			<b>Response Yes/No</b>		
	Settlement Report (System Operator	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and	<b>N</b>		

	version)		Prices for the whole system.		
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	Y	This data is contained in the above report and its inclusion here represents a duplication, and thus an inefficiency.
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.	Y	This data is contained in the report below and its inclusion here represents duplication, and thus an inefficiency.
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.	N	
<b>Q5</b>	<b>Do you object to the removal of the confidentiality of any of the following Party information (As outlined in Appendix 1 of the requirements Specification)? (If yes please specify)</b>				
	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.	Y	We have concerns about the confidentiality of customer-specific metered data (i.e. BM Units that represent a single customer site), and the potential use of this in other industries following widespread publication.
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.	Y	See above
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.	N	
	Total Gross	CDCA-I029	Aggregated meter flows for	N	

	Demand per GSP		each Grid Supply Point in each GSP Group per Settlement Period.		
<b>Q6</b>	<b>What are your views on the potential uptake of P114 Proposed licence agreement solution?</b>			<b>Number</b>	
	Number of licensees receiving reports direct from Central Systems?			<b>Max 5</b>	
	Number of licensees receiving pre-processed data via a nominated third party?			<b>10 – 20</b>	
<b>Q7</b>	<b>Would the implementation of P114 cause your organisation to remove the Balancing services it offers to the Transmission Company?</b>			<b>Response Yes/No</b>	
				<b>N</b>	
<b>Q8</b>	<b>If implemented would your organisation utilise the Proposed licence agreement Solution (subject to contents of such agreement being acceptable)?_(This question only applies to respondents who's organisation is not currently a BSC Party)</b>			<b>Response Yes/No</b>	
				<b>N/A</b>	
<b>Q9</b>	<b>If implemented would your organisation utilise the potential Alternative Solution by accessing data via the BMRS? (This question only applies to respondents who's organisation is not currently a BSC Party)</b>			<b>Response Yes/No</b>	Innogy would be interested in providing processed data to those who would prefer not to process the enormous amount of data available within the SO142 files, and would be happy to discuss this further with interested LEGs and other non-BSC signatories interested in receiving data.
				<b>N/A</b>	
<b>Q10</b>	<b>Do you have any Further Comments?</b>				

## P114\_ASS\_013 – British Energy

To: Modifications Secretary, BSCCo

P102: Entitlement of Licence Exemptable Generators (LEGs) to BSC Membership Without Evidence of Trading & P114: Entitlement of Licence Exemptable Generators (LEGs) and Other Non-Trading Parties to BSC Membership Without Evidence of Trading

Access to information by non-parties could improve competition and we have no objection to the principle of transparency. However, the costs should be borne by those requiring the service, and obligations on use of data so provided should be equivalent to those applying to parties, otherwise fair competition may be impaired.

Original proposal P102 suggests allowing a subset of non-trading parties to remain party to the BSC for the sole intent of obtaining information and data. It is difficult to demonstrate that overall or BSC-specific cost-benefit/efficiency objectives would be better met by allowing non-parties to incur costs which are then met by parties, or by allowing a subset of interested persons (exempt generators) to obtain data not available to others. Therefore we do not support this proposal.

The solution favoured by the modification group for these two modifications P102 & P104 is a licence service, combined with changes to BSC systems to facilitate the new role of a (non-party) Licensee. While not objecting to this approach in principle, it does not appear that the cost of the system and other changes will be wholly recovered from those requiring the service. Unless this is demonstrated, or the financial benefits of the proposed changes can be demonstrated, we do not believe the proposal will better meet BSC objectives (c) relating to trading efficiency and competition or (d) relating to administrative efficiency.

The assessment for P102 includes the statement that "Any solution, which registers non-Parties in Central Systems, with Party status, relying on BSCCo to ensure that this status was not abused, would be unmanageable." It is this assertion which leads to the requirement for expensive changes to central systems and processes to protect against potential abuse and errors. We are surprised that Elexon and its agents consider it impractical to maintain a record of which parties registered in central systems are BSC Parties, and to limit their use of systems accordingly. We question whether the risks and benefits of this option, relative to expensive system changes, have been fully explored.

Martin Mate

for

British Energy Power & Energy Trading Ltd

British Energy Generation Ltd

Eggborough Power Ltd

P114\_ASS\_014 – Slough Energy Supplies

<b>Respondent:</b>	<i>Name</i> <b>Slough Energy Supplies Limited</b>
<b>Responding on Behalf of</b>	<i>Please list all Parties/non-Parties responding on behalf of (including the respondent company if relevant)</i> <b>Slough Energy Supplies Limited (Supplier); Fibrepower Slough Limited (generator); Slough Energy Contracts Limited (exemptable generator); Slough Utility Services Limited (exemptable generator)</b>
<b>Role of Respondent</b>	<i>BSC Party/LEG/Directly connected customer/Other (Please specify)</i> <b>BSC Party</b>

	<b>Question</b>	<b>Response</b>		<b>Rationale</b>
<b>Q1</b>	<b>Do you believe that the features, as described within Modification Proposal P114 and the accompanying Requirements Specification, would better facilitate achievement of the applicable BSC Objectives?</b>	<b>Response</b>  <b>Proposed</b>  <b>YES</b>	<b>Yes/No</b>  <b>Alternative</b>  <b>YES</b>	
	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.	<b>Response</b>  <b>Proposed</b>	<b>Yes/No</b>  <b>Alternative</b>	As discussed in the P102 consultation document, all BSC parties are required to commence trading activities within 6 months of joining the BSC. The effect of this is that any participants in the electricity

		<b>YES</b>	<b>YES</b>	<p>market who do not wish to become full trading parties are excluded from receiving certain market data which is made available only to BSC parties. The answer to this question 1 seeks to show:</p> <ul style="list-style-type: none"> <li>(i) the anti-competitive effects on LEGs of this inability to gain access to relevant market data and;</li> <li>(ii) how the implementation of P114 would address this anti-competitive effect and therefore facilitate applicable BSC objective (c) (promoting effective competition in the generation and supply of electricity).</li> </ul> <p>Under the current arrangements, some market data is publicly available by means of the Balancing Market Reporting System (BMRS). This includes final physical notifications, imbalance for each half hour. The BMRS provides information in advance of and shortly after real time. However, out-turn information (such as actual system imbalance and actual generation) is not published. Other market data of commercial relevance to LEGs, including the half hourly transmission loss and "beer fund" values, and the net metered and imbalance position of market participants, is restricted to BSC parties. The reason for this cannot be commercial confidentiality, as information relating to each BSC party is available to every other BSC party in the form of the SO142 Report. This unequal access to market data is in</p>
--	--	------------	------------	---

			<p>contrast with the situation under the Pool, where ESIS provided a similar set of data for all paying subscribers.</p> <p>The commercial relevance of this market data to LEGs arises from the fact that LEGs will normally be negotiating to sell their output to a licensed supplier under Supplier Volume Allocation ("SVA"), rather than trading within the NETA markets as BSC parties. The principal reason for this is the cost and administrative burdens involved with trading in the NETA markets which are impracticable for the majority of LEGs to bear. For example, the cost of establishing a fully fledged trading desk in the UKPX are estimated at £1 million, in addition to other incidental costs. Further details of these administrative barriers are contained in Ilex Consulting's report "Contractual and Administrative Barriers Facing Licence-Exempt Generation under NETA", which was attached to proposal P102.</p> <p>Therefore, LEGs will almost always be negotiating for the sale of their output with a licensed supplier, who by definition will be a BSC party and have access to the market data currently denied to non-parties. Any negotiation where one party is entitled to all the relevant information and the other is not, is bound to disadvantage the other party. The current position therefore creates an unjustifiable handicap for the</p>
--	--	--	--



			<p>negotiating position of LEGs as against licensed suppliers. As an example of how access to the relevant market data will improve the position for LEGs, knowing the metered quantities and imbalance positions of potential contracting counterparties would substantially assist LEGs in determining both who was in a position to contract with them and to better understand the trading position of that counterparty. It would also enable LEGs to verify independently the benefits of particular supplier contracts or consolidation benefits where the counterparty is a BSC Party and is therefore in possession of such information.</p> <p>The difficulty for LEGs is that contracting under SVA inevitably restricts them from accessing such vital market information. The dilemma which they face is that, currently, the only way of accessing this information is to become full trading BSC parties, a route to market which, as explained above, is uneconomic for the vast majority of them. The current arrangements therefore place LEGs in a position where they are either:</p> <ul style="list-style-type: none"><li>(i) contracting under SVA with licensed suppliers as against whom they have a handicapped bargaining position due, amongst other reasons, to the asymmetry of market data available to LEGs and licensed suppliers; or</li></ul>
--	--	--	--

			<p>(ii) obliged to overcome the cost and administrative barriers of becoming full trading BSC parties which are uneconomical for them. The current arrangements therefore impose an unjustified barrier on any LEG wishing to access this market data. The Proposer can see no objective reason why LEGs should not be entitled to receive the market data provided to BSC Parties given its importance with LEGs dealing with suppliers.</p> <p>The effect of the lack of market data available to LEGs who are not fully trading BSC parties is one of a range of market barriers faced by LEGs. It is an anti-competitive aspect of the current NETA market structure that this information, which is not confidential, should be available to one party to a contract, but not the other. The effect of this barrier has been to contribute to the disproportionately adverse impacts which NETA has had upon LEGs and which are well documented, for example they are referred to in 14 responses from the smaller generator market to the DTI's consultation on smaller generators and NETA of 1<sup>st</sup> November 2001. This has resulted in significant withdrawals from the LEG sector and threatens its continued participation in the generation market. It cannot be in the interest of competition that a sector providing some 8% of capacity in the uk should be placed in jeopardy.</p>
--	--	--	---

				<p>Making available crucial market information to LEGs from whom full trading BSC participation is not a practical option will assist in creating a fairer negotiating position for most LEGs and thereby better facilitate applicable BSC objective (c) (promoting effective competition in the generation and supply of electricity). For further details of the impacts of NETA on LEGs, please see the Ilex Reports "An Objective Assessment of the Impact of NETA on Smaller Generators" (available on the Ilex website) and "Contractual and Administrative Barriers Facing Licence Exempt Generators under NETA", referred to in the answer to question 1.</p> <p>Both the proposed and alternative modification promote the BSC objectives. The Proposer notes the concerns of some of the Modification Group members regarding the effects on efficiency and implementation of following the proposed modification rather than the alternative and sees the alternative as a workable substitute.</p>
	Objective D – Promoting efficiency in the implementation and administration of the Balancing and Settlement arrangements	<b>Response Proposed</b> <b>Yes</b>	<b>Yes/No Alternative</b> <b>Yes</b>	LEGs would be better informed of how the Balancing and Settlement arrangements are operating in practice, as a result of access to the relevant data. That can only assist the implementation and administration of the Balancing and Settlement arrangements.

Q2	Please specify which solution, as identified in the attached Requirement Specification, best addresses the defect raised by P114?	Tick	Preferred solution	
	1. Requirement Specification. This is not yet reflected in the draft licence.			This is a workable solution, but the licence must not be terminable by BSCCo, other than for the grounds if termination set out in paragraph 3.2.2 of the Requirement Specification. This is not yet reflected in the draft licence.
	2. Potential Alternative Solution – Remove confidentiality of all Party reports and publish on BMRS.	✓		This has the advantage of greater simplicity and lower cost. There are no confidentiality issues, since the information which is currently confidential is available to all BSC Parties. The potential alternative solution is significantly superior to the alternative of the grant of a licence (in the proposed form) which places the licensee under constraints and limitations which neither do nor need apply to persons in receipt of the same information through the BMRS. In addition the format of the BMRS would improve the usefulness of the information to be made available to non Parties.
Q3	Do you support the Provision of data to any interest person.	Response	Yes/No Yes	

<p><b>Q4</b></p>	<p>Do you have any specific issues with the following Party information (as outlined in Appendix 1 of the requirements Specification) being made available to persons not involved in trading activity? (If yes please specify particular issues)</p>	<p>Response</p>	<p>Yes/No No</p>	<p>The availability of the data referred to above will promote competition (see above).</p> <p>As explained in the answers to question 1 above, the fact that LEGs are not involved in trading activities does not mean that the market data specified in Appendix 1 is of any less relevance to their participation in the electricity market. The Proposer cannot see any reason why such information should be made available to one contracting party but not the other. In terms of potential concerns such as confidentiality which have been expressed in P114 MG, these will be dealt with either by the relevant LEG becoming a signatory to the BSC or by replicating the appropriate BSC obligation in the appropriate form of licensing agreement.</p>
------------------	---	-----------------	----------------------	--

	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party. Volumes and Prices for the whole system.		No	
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.		No	
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.		No	
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.		No	
<b>Q5</b>	<b>Do you object to the removal of the confidentiality of any of the following Party information (As outlined in Appendix 1 of the requirements Specification)? (If yes please specify)</b>			<b>Response</b>	<b>No</b>	As explained in the answers to Q4, this information is already available to BSC Parties. The removal of the confidentiality also promotes BSC Objectives (see answer to Q1).

	Settlement Report (System Operator version)	SAA-I014	Bid-Offer Data, Acceptance Data and Trading Charges for each Party, Volumes and Prices for the whole system.		No	
	Aggregated Data Report	CDCA-I042	Metered Volumes for each BM Unit, Interconnector or GSP Group.		No No No	
	Meter Period Data Report	CDCA-I030	Metered Volumes for all Distribution Systems Connection Points.			
	Total Gross Demand per GSP	CDCA-I029	Aggregated meter flows for each Grid Supply Point in each GSP Group per Settlement Period.			
<b>Q6</b>	<b>What are your views on the potential uptake of P114 Proposed licence agreement solution?</b>				<b>Number</b>	
	Number of licensees receiving reports direct from Central Systems?					The Proposer thinks it unlikely that many LEGs will receiving reports direct from Central Systems, unless Modification P103 is accepted and implemented, since the data is not sufficiently usable in its current form

				by LEGs.
--	--	--	--	----------



	Number of licensees receiving pre-processed data via a nominated third party?			The number of LEGs receiving pre-processed data via a nominated third party should increase, beginning with the larger LEGs, as LEGs become progressively more familiar with the value of the data in trading and learn to use it. The predicted number of LEGs who use the data is however not material as to whether the proposed modification facilitates the achievement of the BSC objectives, since it is plainly contrary to the promotion of competition that the data is not available to LEGs.
<b>Q7</b>	<b>Would the implementation of P114 cause your organisation to remove the Balancing services it offers to the Transmission Company?</b>	<b>Response</b>	<b>Yes/No No</b>	The contention that the implementation would cause a reduction in balancing Services offered is hypothetical and unproven. The concern is that large demand sites identifiable as individual BMUs may be removed from the Balancing Mechanism in response to information on them being available to their competitors. Such information is already available to all existing BSC parties and if this contention were material, such BMUs would already have been removed. Moreover, if in any instance this contention were to be found true, the removal of that BMU would have occurred in response to increased competition brought about by P114 which would support BSC objectives.
<b>Q8</b>	<b>If implemented would your organisation utilise the Proposed licence agreement Solution? (This question only applies to respondents who's organisation is not currently a BSC Party)</b>	<b>Response</b>	<b>Yes/No Yes</b>	

<b>Q9</b>	If implemented would your organisation utilise the potential Alternative Solution by accessing data via the BMRS? (This question only applies to respondents who's organisation is not currently a BSC Party)	Response	Yes/No YES	
<b>Q10</b>	Do you have any Further Comments			<p>The Proposer believes that the provision of market data to LEGs is important. Their participation in the electricity market is significantly affected by their inability to manage their imbalance risk, through the barriers associated with their trading as BSC signatories. Enabling LEGs to manage their imbalance risk and the lowering of such barriers is contributed to by LEGs having access to all relevant market data.</p> <p>Although LEGs are mostly not BSC Parties, they are generally exposed to imbalance risk as negotiation for the sale of their output to suppliers is against the background of the suppliers' exposure to the balancing mechanism. Normally therefore, balancing risk is passed down to LEGs in their contracts with licensed suppliers, or alternatively the supplier demands a premium for not doing so. Not enabling LEGs to have access to the market data which informs the decision making of the licensed supplier with whom they contract is an unjustifiable and therefore anti-competitive restriction on LEGs' ability to obtain the true value of their output. Please see also the answer to question 1 above. Reference is again made to the Ilex report "Contractual and</p>

			<p>Administrative Barriers facing Licence-Exempt Generators under NETA" which explains the barriers to LEGs' market participation. Reference is made also to Ilex's report "Impact of Non-Cost Reflective Pricing on LEGs" (available on the Ilex website) and the report of Campbell Carr "Impact of non-cost reflective pricing on LEGs" (which was produced to the P95 Modification Group). Both these reports explain the undue effects of imbalance risk on LEGs who do not have the facilities under NETA to manage it.</p> <p>Although it is clear that P114 should be considered on its own merits, irrespective of other proposed modifications, the Proposer believes it would be useful to ensure there is no misunderstanding of how proposal P114 is intended to interact with proposal P103 (Respecification of Trading Data). P103 seeks to address the lack of accessibility and transparency that market data which is currently provided to LEGs, by improving the data provided to all BSC parties. The answers to question 1 shows that the arguments for the implementation of P114 stand alone and are not dependent upon on the implementation of any other modification. However, the implementation of P114 is also important to ensure that the implementation of P103 would have the desired effect, namely by providing that LEGs are entitled to be BSC parties or to have access to the relevant data by means of licence.</p>
--	--	--	--

