

Responses from P107 Second Assessment Consultation

Consultation issued 28 January 2003

Representations were received from the following parties:

No	Company	File Number	No. BSC Parties Represented
1.	IMServ	P107_ASS2_001	1
2.	British Gas Trading	P107_ASS2_002	1
3.	Innogy	P107_ASS2_003	9
4.	NGC	P107_ASS2_004	1
5.	Scottish and Southern	P107_ASS2_005	4
6.	Scottish Power	P107_ASS2_006	6
7.	LE Group	P107_ASS2_007	7

P107_ASS2_001 – IMServ

Respondent:	<i>IMServ Europe Ltd</i>
Responding on Behalf of	<i>IMServ Europe Ltd</i>
Role of Respondent	<i>NHH/HH DC/DA</i>

No	Question	Response	
		Response Yes/No	Rationale
Q1	Do you consider that the refined solution for P107 better facilitates the Applicable BSC Objectives:		
	'(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'?	No	Cannot see any link between competition and data retention period.
	'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'?	No	Does the opposite. Encourages issues to fester rather than being resolved quickly.

No	Question	Response	
Q2	<p>Do you agree that there should be a cut off for Settlement Runs such that no Settlement Run can be performed more than 28 months after the Settlement Day to which it relates (including removal of the Panel's power to authorise Settlement Runs beyond the normal cut-off)?</p> <p>(If not please specify an alternative approach)</p>	<p>Response Yes/No</p> <p>Yes</p>	<p>Rationale:</p> <p>Will encourage the disputes to be raised earlier</p>
Q3	<p>Do you agree that Parties and Party Agents should be obliged to retain 28 months of Settlement data such that they can support a Dispute Final Settlement Run up to 28 months after the Settlement Day to which such Run relates (i.e. in the live operational environment)?</p> <p>(If not please specify an alternative approach)</p>	<p>Response Yes/No</p> <p>No</p>	<p>Rationale:</p> <p>Suggest that this is too long – should be encouraging disputes to be raised earlier.</p>
Q4	<p>Do you agree that after 28 months, Parties and Party Agents should be obliged to retain Settlement data such that it can be used in the resolution of Trading Disputes via an Extra Settlement Determination? (Where it has been necessary to maintain Settlement data in the live operational environment in support of Settlement Runs for the previous 28 months it will be possible to either move this data to archive or use the live operational environment for a further 12 months)</p> <p>(If not please specify an alternative approach)</p>	<p>Response Yes/No</p>	<p>Rationale:</p> <p>There is no where in any of the documentation provided that states what benefit this change will provide. Does the volume of disputes justify this?</p>

No	Question	Response	
Q5	Do you agree that, where data is to be retained in support of an Extra Settlement Determination (i.e beyond 28 months after the Settlement Day) via archive, this Settlement data should be a complete copy of the live operational environment data, or should the archived data be a sub-set of the live operational environment data items required to support Extra Settlement Determinations?	Response Complete Copy / Subset	Rationale:
	<ul style="list-style-type: none"> - If you believe archived data should be a sub-set of the Settlement data stored in the live operational environment, should this sub-set be prescribed or left under the control of Parties/Party Agents? 	Subset	Should be left to the control of the parties/ party agents.
	<ul style="list-style-type: none"> - If you believe that the type of data to be archived should be a prescribed sub-set of the data from the live operational environment, please specify the type of data that should be retained? 	--	Settlement data relevant to the party/parties agent. This is specific to the agent.
Q6	If you have previously been involved in a Trading Dispute that was not resolved during the Settlement timetable (by 14 months after the Settlement Day), what kinds of data have you provided to the TDC?	--	Half hourly data for the metering point.

No	Question	Response	
Q7	Do you agree that the costs associated with specifying a minimum archiving frequency outweigh the benefits of a potential increase in the accuracy of Settlement data entering the Trading Disputes process and that therefore it is not necessary to specify the frequency of archiving? (If you believe it is necessary to specify the frequency of archiving, please specify the preferred frequency e.g. monthly, weekly, daily)	<p>Response Yes/No</p> <p>No</p>	<p>Rationale:</p> <p>The frequency of archive should be left to the control of agents. Requirements should be clearly defined to avoid any ambiguity.</p>
Q8	Do you agree that the transfer of data (MOAs and DCs) should relate to live operational data only (I.e. the latest 28 months Settlement Data) or should this also include the additional 12 months Settlement data used to support Extra Settlement Determination?	<p>Response</p> <p>28 months only</p>	<p>Rationale:</p> <p>It would be easier to transfer the data from the live environment. Again, the shorter timescale would encourage disputes to be raised and resolved in a shorter timescale.</p>
Q9	Do you agree that if P107 is approved, Parties should be given a three month period to raise any Trading Queries / Trading Disputes that relate to Settlement Days between 20 and 36 months prior to the Implementation Date (i.e. the same amnesty period given at NETA Go-Live)?	<p>Response</p> <p>Yes</p>	<p>Rationale:</p>
Q10	Do you have any other comments or issues?	<p>Comments:</p> <p>Evidence that this change will deliver benefits.</p> <p>Cost/benefit analysis required to ensure that this will resolve any current issues and be worth the money and time being spent on it.</p>	

P107_ASS2_002 – British Gas Trading

Respondent:	Mark Manley
Responding on Behalf of	British Gas Trading (BGT)
Role of Respondent	BSC Party

No	Question	Response	
		Response Yes/No	Rationale
Q1	Do you consider that the refined solution for P107 better facilitates the Applicable BSC Objectives:		
	'(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'?	No	BGT do not believe that this Modification Proposal will better facilitate this particular BSC Objective.

No	Question	Response	
	<p>'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'?</p>	<p>Yes</p>	<p>BGT believe that this particular BSC Objective will be better facilitated by the delivery of this Modification Proposal. By reducing the timescales associated with raising Post Final Trading Queries this will encourage BSC Parties to check their Settlement output more promptly. The Modification Proposal also improves the clarity of the BSC by removing the ability to perform a Post Final Settlement Run after 28 months following the Settlement Day in question. This in turn assists BSC Parties (Parties), BSC Agents (Agents) and Party Agents (PA) in relation to their data retention requirements under the BSC.</p>

No	Question	Response	
Q2	<p>Do you agree that there should be a cut off for Settlement Runs such that no Settlement Run can be performed more than 28 months after the Settlement Day to which it relates (including removal of the Panel's power to authorise Settlement Runs beyond the normal cut-off)?</p> <p>(If not please specify an alternative approach)</p>	<p>Response</p> <p>Yes</p>	<p>Rationale:</p> <p>The implementation of Modification Proposal P61 introduced the concept of an Extra Settlement Determination. An Extra Settlement Determination can be utilised at any point during the Disputes process to correct an error. Therefore introducing a cut off point for performing Post Final Settlement Runs does not remove the Panel's ability to correct Disputes after 28 months it merely removes the flexibility currently available. Whilst the 28-month cut off point provides certainty for Parties, Agents and PA for them to be able to archive data at a specified point. Additionally if resolution is required after 40 months the archiving of data is a much easier to manage and a more cost efficient process than maintaining data on line for potentially an infinite period.</p>

No	Question	Response	
Q3	<p>Do you agree that Parties and Party Agents should be obliged to retain 28 months of Settlement data such that they can support a Dispute Final Settlement Run up to 28 months after the Settlement Day to which such Run relates (i.e. in the live operational environment)?</p> <p>(If not please specify an alternative approach)</p>	<p>Response</p> <p>Yes</p>	<p>Rationale:</p> <p>The Modification Proposal proposes bring the BSC into line with BSCP11 allowing Parties to raise Disputes up to 20 months after the Settlement Day in question. Section W 4.1.4 of the BSC obligates Parties and PA to support the Trading Disputes Committee (TDC) in resolving issues. BSCP11 specifies the timescales for processing a Post Final Dispute up to presentation to the TDC. In view of those timescales and need to present the Dispute to the TDC, 28 months appears to be a sensible time frame without placing too onerous an obligation on Parties and PA in respect of data retention.</p>

No	Question	Response	
Q4	<p>Do you agree that after 28 months, Parties and Party Agents should be obliged to retain Settlement data such that it can be used in the resolution of Trading Disputes via an Extra Settlement Determination? (Where it has been necessary to maintain Settlement data in the live operational environment in support of Settlement Runs for the previous 28 months it will be possible to either move this data to archive or use the live operational environment for a further 12 months)</p> <p>(If not please specify an alternative approach)</p>	<p>Response</p> <p>Yes</p>	<p>Rationale:</p> <p>In view of the legal advice provided by ELEXON that stated we could not place definitive timescales on the TDC for resolving Disputes, there needs to be an additional data retention requirement in excess of the 28 months. Also BSC Parties have the right to appeal the decision of the TDC to the BSC Panel and Arbitration so there needs to be additional data retention requirements after the 28-month period to support these provisions. The archiving of data would appear to be the most cost effective method of maintaining data whilst still allowing for the resolution of Disputes.</p>
Q5	<p>Do you agree that, where data is to be retained in support of an Extra Settlement Determination (i.e beyond 28 months after the Settlement Day) via archive, this Settlement data should be a complete copy of the live operational environment data, or should the archived data be a sub-set of the live operational environment data items required to support Extra Settlement Determinations?</p>	<p>Response</p> <p>Complete Copy</p>	<p>Rationale:</p> <p>It is impossible to predict what data items maybe required to support an Extra Settlement Determination. Therefore BGT support the requirement for a complete copy of the data set to be archived. This will allow an Extra Settlement Determination to be undertaken.</p>
	<p>– If you believe archived data should be a sub-set of the Settlement data stored in the live operational environment, should this sub-set be prescribed or left under the control of Parties/Party Agents?</p>	<p>Response</p> <p>N/A</p>	

No	Question	Response	
	<ul style="list-style-type: none"> - If you believe that the type of data to be archived should be a prescribed sub-set of the data from the live operational environment, please specify the type of data that should be retained? 	N/A	
Q6	<p>If you have previously been involved in a Trading Dispute that was not resolved during the Settlement timetable (by 14 months after the Settlement Day), what kinds of data have you provided to the TDC?</p>	N/A	
Q7	<p>Do you agree that the costs associated with specifying a minimum archiving frequency outweigh the benefits of a potential increase in the accuracy of Settlement data entering the Trading Disputes process and that therefore it is not necessary to specify the frequency of archiving? (If you believe it is necessary to specify the frequency of archiving, please specify the preferred frequency e.g. monthly, weekly, daily)</p>	<p>Response</p> <p style="text-align: center;">Yes</p>	<p>Rationale:</p> <p>This is an issue that already exists and to ask Parties and PA to take a snap shot of data after each Reconciliation Run is not viable. In view of this being an existing defect BGT do not believe that the additional cost that would be incurred justifies the benefit of the potential increase in accuracy.</p>

No	Question	Response	
Q8	Do you agree that the transfer of data (MOAs and DCs) should relate to live operational data only (I.e. the latest 28 months Settlement Data) or should this also include the additional 12 months Settlement data used to support Extra Settlement Determination?	Response All 40 months	Rationale: BGT support the transfer of data for the full 40 months, as there is a requirement to support the Disputes process for 40 months. The data retention requirements for the additional 12-month period will be maintained via archiving. Data should be easily transferable between PA, one option maybe to utilise the process provided by Modification P63.
Q9	Do you agree that if P107 is approved, Parties should be given a three month period to raise any Trading Queries / Trading Disputes that relate to Settlement Days between 20 and 36 months prior to the Implementation Date (i.e. the same amnesty period given at NETA Go-Live)?	Response Yes	Rationale: BSC Parties under the current baseline of the BSC can raise a Dispute up to 36 months after the Settlement Day to which the error relates. As the Modification Proposal is proposing to reduce that capability to 20 months it would appear reasonable to provide a window for Disputes to be raised outside of the newly proposed deadline. BGT support the suggested three months period and this is consistent with the Disputes amnesty that was introduced at Go-Live.

No	Question	Response
Q10	Do you have any other comments or issues?	Comments:

P107_ASS2_009 – Innogy

Respondent:	Mark Thomas
Responding on Behalf of	Innogy Group (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)
Role of Respondent	BSC Party

No	Question	Response	
Q1	Do you consider that the refined solution for P107 better facilitates the Applicable BSC Objectives:	Response Yes/No	Rationale
	'(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'?	No	This modification seeks to revise the cut-off points for raising a Post Final Trading Query / Trading Dispute and performing Post Final Settlement Run and Extra Settlement Determination as well as specific data retention obligations none of which promote competition in generation and supply.
	'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'?	Yes	

No	Question	Response	
Q2	<p>Do you agree that there should be a cut off for Settlement Runs such that no Settlement Run can be performed more than 28 months after the Settlement Day to which it relates (including removal of the Panel's power to authorise Settlement Runs beyond the normal cut-off)?</p> <p>(If not please specify an alternative approach)</p>	<p>Response</p> <p>Yes</p>	<p>Rationale:</p>
Q3	<p>Do you agree that Parties and Party Agents should be obliged to retain 28 months of Settlement data such that they can support a Dispute Final Settlement Run up to 28 months after the Settlement Day to which such Run relates (i.e. in the live operational environment)?</p> <p>(If not please specify an alternative approach)</p>	<p>Response</p> <p>Yes</p>	<p>Rationale:</p>
Q4	<p>Do you agree that after 28 months, Parties and Party Agents should be obliged to retain Settlement data such that it can be used in the resolution of Trading Disputes via an Extra Settlement Determination? (Where it has been necessary to maintain Settlement data in the live operational environment in support of Settlement Runs for the previous 28 months it will be possible to either move this data to archive or use the live operational environment for a further 12 months)</p> <p>(If not please specify an alternative approach)</p>	<p>Response</p> <p>Yes</p>	<p>Rationale:</p>

No	Question	Response	
Q5	Do you agree that, where data is to be retained in support of an Extra Settlement Determination (i.e beyond 28 months after the Settlement Day) via archive, this Settlement data should be a complete copy of the live operational environment data, or should the archived data be a sub-set of the live operational environment data items required to support Extra Settlement Determinations?	Response Complete Copy	Rationale: Not always obvious what Settlement data is required to support a Dispute Run.
	<ul style="list-style-type: none"> - If you believe archived data should be a sub-set of the Settlement data stored in the live operational environment, should this sub-set be prescribed or left under the control of Parties/Party Agents? 	Response Prescribed / Subset	
	<ul style="list-style-type: none"> - If you believe that the type of data to be archived should be a prescribed sub-set of the data from the live operational environment, please specify the type of data that should be retained? 	--	
Q6	If you have previously been involved in a Trading Dispute that was not resolved during the Settlement timetable (by 14 months after the Settlement Day), what kinds of data have you provided to the TDC?	--	Metered data Scada data Switching records Customer own reads

No	Question	Response	
Q7	Do you agree that the costs associated with specifying a minimum archiving frequency outweigh the benefits of a potential increase in the accuracy of Settlement data entering the Trading Disputes process and that therefore it is not necessary to specify the frequency of archiving? (If you believe it is necessary to specify the frequency of archiving, please specify the preferred frequency e.g. monthly, weekly, daily)	<p>Response</p> <p>No</p>	<p>Rationale:</p> <p>Frequency of archiving should be up to the individual BSC Party / Agent as long as they meet the overall requirements.</p>
Q8	Do you agree that the transfer of data (MOAs and DCs) should relate to live operational data only (I.e. the latest 28 months Settlement Data) or should this also include the additional 12 months Settlement data used to support Extra Settlement Determination?	<p>Response</p> <p>28 months only</p>	<p>Rationale:</p> <p>Original agent should be under obligation to hold a full 40 months.</p>
Q9	Do you agree that if P107 is approved, Parties should be given a three month period to raise any Trading Queries / Trading Disputes that relate to Settlement Days between 20 and 36 months prior to the Implementation Date (i.e. the same amnesty period given at NETA Go-Live)?	<p>Response</p> <p>Yes</p>	<p>Rationale:</p>
Q10	Do you have any other comments or issues?	<p>Comments:</p> <p>None</p>	

P107_ASS2_004 – NGC

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

No	Question	Response	
		Response Yes/No	Rationale
Q1	Do you consider that the refined solution for P107 better facilitates the Applicable BSC Objectives:		
	'(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'?		
	'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'?	Yes	We believe this modification will better facilitate BSC Objective (d) as it provides for the reduction of timescales for the retention of archived data and addresses the associated costs.

No	Question	Response	
Q2	<p>Do you agree that there should be a cut off for Settlement Runs such that no Settlement Run can be performed more than 28 months after the Settlement Day to which it relates (including removal of the Panel's power to authorise Settlement Runs beyond the normal cut-off)?</p> <p>(If not please specify an alternative approach)</p>	<p>Response</p> <p>Yes</p>	<p>Rationale:</p> <p>We support the views of the GSMG that this is an appropriate cut-off timescale as most Trading Disputes are resolved within 28 months.</p>
Q3	<p>Do you agree that Parties and Party Agents should be obliged to retain 28 months of Settlement data such that they can support a Dispute Final Settlement Run up to 28 months after the Settlement Day to which such Run relates (i.e. in the live operational environment)?</p> <p>(If not please specify an alternative approach)</p>	<p>Response</p> <p>Yes</p>	<p>Rationale:</p> <p>For disputes to be processed in an efficient manner, the data needs to be readily available as in a "live" environment.</p>
Q4	<p>Do you agree that after 28 months, Parties and Party Agents should be obliged to retain Settlement data such that it can be used in the resolution of Trading Disputes via an Extra Settlement Determination? (Where it has been necessary to maintain Settlement data in the live operational environment in support of Settlement Runs for the previous 28 months it will be possible to either move this data to archive or use the live operational environment for a further 12 months)</p> <p>(If not please specify an alternative approach)</p>	<p>Response</p> <p>Yes</p>	<p>Rationale:</p> <p>Following the Settlement cut-off period we feel it is appropriate for parties to retain data in a format that can be retrieved for a further specified period. We agree that 12 months would be an appropriate period.</p>

No	Question	Response	
Q5	Do you agree that, where data is to be retained in support of an Extra Settlement Determination (i.e beyond 28 months after the Settlement Day) via archive, this Settlement data should be a complete copy of the live operational environment data, or should the archived data be a sub-set of the live operational environment data items required to support Extra Settlement Determinations?	Response Complete Copy	Rationale: The complete copy approach ensures that parties have retained sufficient settlement data to enable Trading Disputes to be resolved with full confidence. If all parties were to retain a varying subset of data this could lead to greater uncertainty in resolving disputes.
	<ul style="list-style-type: none"> - If you believe archived data should be a sub-set of the Settlement data stored in the live operational environment, should this sub-set be prescribed or left under the control of Parties/Party Agents? 	Response Prescribed / Subset	Whilst we support retaining a complete copy, if it is decided to retain a subset then we believe this should be fixed and not left to individual parties.
	<ul style="list-style-type: none"> - If you believe that the type of data to be archived should be a prescribed sub-set of the data from the live operational environment, please specify the type of data that should be retained? 	--	We believe that not retaining the full data set may compromise the ability to resolve disputes.
Q6	If you have previously been involved in a Trading Dispute that was not resolved during the Settlement timetable (by 14 months after the Settlement Day), what kinds of data have you provided to the TDC?	--	N/A

No	Question	Response	
Q7	Do you agree that the costs associated with specifying a minimum archiving frequency outweigh the benefits of a potential increase in the accuracy of Settlement data entering the Trading Disputes process and that therefore it is not necessary to specify the frequency of archiving? (If you believe it is necessary to specify the frequency of archiving, please specify the preferred frequency e.g. monthly, weekly, daily)	Response Yes	Rationale: We agree with the conclusions of the GSMG and that parties should be able to determine their own archiving policy.
Q8	Do you agree that the transfer of data (MOAs and DCs) should relate to live operational data only (I.e. the latest 28 months Settlement Data) or should this also include the additional 12 months Settlement data used to support Extra Settlement Determination?	Response 28 months only /All 40 months	Rationale: We have no view on this issue.
Q9	Do you agree that if P107 is approved, Parties should be given a three month period to raise any Trading Queries / Trading Disputes that relate to Settlement Days between 20 and 36 months prior to the Implementation Date (i.e. the same amnesty period given at NETA Go-Live)?	Response Yes	Rationale: We support the conclusions of the GSMG on the issue and agree that this provides sufficient timescale for implementation.
Q10	Do you have any other comments or issues?	Comments: No	

P107_ASS2_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 ten questions listed in the Consultation Paper, contained within your note of 28th January 2003 concerning Modification Proposals P107, we have the following comments to make:-

Q1 Do you consider that the refined solution for P107 better facilitates the Applicable BSC Objectives:

Objective (c) promoting competition - Yes, we believe the proposals do promote competition by clarifying the requirements which might otherwise be seen as a barrier to entry to smaller players.

Objective (d) increasing efficiency - Yes, it is more efficient to have the dispute timetable, method of resolution and data retention requirements consistent with each other. The timescales for on line retention is consistent with current industry practice. It is not efficient to have to keep data for long periods "just in case".

Q2 Do you agree that there should be a cut off for Settlement Runs such that no Settlement Run can be performed more than 28 months after the Settlement Day to which it relates (including removal of the Panel's power to authorise Settlement Runs beyond the normal cut-off)?

Yes. Six months after RF is more than adequate. We should work towards reducing this period over time.

Q3 Do you agree that Parties and Party Agents should be obliged to retain 28 months of Settlement data such that they can support a Dispute Final Settlement Run up to 28 months after the Settlement Day to which such Run relates (i.e.. in the live operational environment)?

Yes. Eight months after the latest date for raising disputes is more than adequate to request and assemble data for all disputes for the day in question, and perform the DF run.

Q4 Do you agree that after 28 months, Parties and Party Agents should be obliged to retain Settlement data such that it can be used in the resolution of Trading Disputes via an Extra Settlement Determination? (Where it has been necessary to maintain Settlement data in the live operational environment in

support of Settlement Runs for the previous 28 months it will be possible to either move this data to archive or use the live operational environment for a further 12 months).

Yes. All parties should keep data for a consistent period.

Q5 Do you agree that, where data is to be retained in support of an Extra Settlement Determination (i.e beyond 28 months after the Settlement Day) via archive, this Settlement data should be a complete copy of the live operational environment data, or should the archived data be a sub-set of the live operational environment data items required to support Extra Settlement Determinations?

Each party and agent will have their own optimal solutions to this. The requirement should be specified, not the solution.

Q6 If you have previously been involved in a Trading Dispute that was not resolved during the Settlement timetable (by 14 months after the Settlement Day), what kinds of data have you provided to the TDC?

Q7 Do you agree that the costs associated with specifying a minimum archiving frequency outweigh the benefits of a potential increase in the accuracy of Settlement data entering the Trading Disputes process and that therefore it is not necessary to specify the frequency of archiving? (If you believe it is necessary to specify the frequency of archiving, please specify the preferred frequency e.g. monthly, weekly, daily)

Yes. Each party and agent will have their optimal solution. They should be free to determine their own frequency provided they can meet the obligation.

Q8 Do you agree that the transfer of data (MOAs and DCs) should relate to live operational data only (I.e. the latest 28 months Settlement Data) or should this also include the additional 12 months Settlement data used to support Extra Settlement Determination?

It should only be for the latest 28 months Settlement Data as it is impractical to transfer other data.

Q9 Do you agree that if P107 is approved, Parties should be given a three month period to raise any Trading Queries / Trading Disputes that relate to Settlement Days between 20 and 36 months prior to the Implementation Date (i.e. the same amnesty period given at NETA Go-Live)?

Yes. This is a reasonable transition arrangement. For the avoidance of doubt, it should be made clear that the three months would start from the Implementation Date.

Q10 Do you have any other comments or issues?
We have no further comments to make at this time.

Regards

Garth Graham
Scottish and Southern Energy plc

P107_ASS2_006 – Scottish Power

Respondent:	Name John W Russell (Calanais Ltd)
Responding on Behalf of	Please list all Parties / non-Parties / Party Agent responding on behalf of (including the respondent company if relevant). Scottish Power UK plc; ScottishPower Energy Trading Ltd.; Scottish Power Generation plc; ScottishPower Energy Retail Ltd.; SP Transmission plc; SP Manweb plc.
Role of Respondent	(BSC Party / non-Parties / Part Agent Other (Please specify)) BSC Party

No	Question	Response	
Q1	Do you consider that the refined solution for P107 better facilitates the Applicable BSC Objectives:	Response Yes/No	Rationale
	'(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'?	No	<p><i>The original intent of P107 was to impose a maximum data retention period of 28 months (where no Trading Disputes are outstanding), and bring the BSC into line with other industry documentation, which would reduce the cost burden, encourage new entrants and better the facilitation of this applicable BSC Objective.</i></p> <p><i>We do not believe that <u>this</u> version of P107, as drafted in this consultation, better facilitates the Applicable BSC Objective, as by introducing a longer data retention period (overall 40 months) compared with that currently in place (36 months), P107 increases the cost burden on market participants and therefore, is a discouraging factor to any new entrants.</i></p>

No	Question	Response	
	<p>'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements?'</p>	<p>No</p>	<p><i>We believe that whilst this draft of P107 would still improve the efficiency of the Disputes process by having cut off points, it still does not promote efficiency by not aligning with other industry documentation.</i></p> <p><i>Indeed, by imposing specific archival and retrieval requirements, the costs to market participants could be increased significantly through the need to enhance the archiving routines contained within their operational systems.</i></p> <p><i>However, we believe the original P107, which requires a maximum data retention of 28 months (where no Trading Disputes are outstanding), with specific cut off points for different processes and in line with other industry documentation, would improve efficiency in the BSC arrangements.</i></p>
<p>Q2</p>	<p>Do you agree that there should be a cut off for Settlement Runs such that no Settlement Run can be performed more than 28 months after the Settlement Day to which it relates (including removal of the Panel's power to authorise Settlement Runs beyond the normal cut-off)?</p> <p>(If not please specify an alternative approach)</p>	<p>Response Yes/No</p> <p>Yes</p>	<p>Rationale:</p> <p><i>We believe that the proposed 28 month cut off for Settlement Runs provides the TDC with a focus that will ensure both the need to raise disputes timeously and to have them resolved timeously. This should add to the overall efficiency of the disputes process. It also focuses the minds of BSC Parties on the robustness of their validation processes.</i></p> <p><i>The clear 28th month cut off will also assist Parties to plan and implement a standard archival and deletion policy for their relevant systems that will meet their obligations as well as addressing their performance and storage issues, provided of course that they comply with the minimum retention periods agreed and can support Extra Settlement Determinations where directed by the TDC.</i></p>

No	Question	Response	
Q3	<p>Do you agree that Parties and Party Agents should be obliged to retain 28 months of Settlement data such that they can support a Dispute Final Settlement Run up to 28 months after the Settlement Day to which such Run relates (i.e. in the live operational environment)?</p> <p>(If not please specify an alternative approach)</p>	<p>Response Yes/No Yes</p>	<p>Rationale:</p> <p><i>We accept that holding the data for 28 months on-line is one solution, however, we believe that it is sensible that obligations on Parties should be aligned across all industry documentation. We would favour an approach to hold data online for a minimum of 24 months within a maximum retention period of 28 months (where no Trading Disputes are outstanding). This will assist Parties to plan and implement a standard archival and deletion policy for their relevant systems that will meet their obligations as well as addressing their performance and storage issues, provided of course that they comply with the minimum retention periods agreed.</i></p> <p><i>In this regard, Circular CPC00104 which introduced an archival process for ISRA/SVAA is relevant. The ISRA/SVAA Archive facility is designed to archive data relating to a Settlement Date which is at least two years old and has had a Final Reconciliation run successfully performed. If the Final Reconciliation is completed by 28 months, this will keep data for between 24 and 28 months. One option for consideration may be the MRA method of implementation, which allows for "... no less than 28 months to be held the most recent 24 months being held on-line" (which fits in with their 24 month refresh). This may help to reconcile the ISRA/SVAA and also bring consistency with the MRA as well by giving the option of holding 4 months "off-line" with a recoverable option to allow for maintaining 28 months.</i></p> <p><i>If there has been no dispute up to 24 months, why keep data on-line for the remaining 4 months, provided that there is a recoverable option available?</i></p>

No	Question	Response	
Q4	<p>Do you agree that after 28 months, Parties and Party Agents should be obliged to retain Settlement data such that it can be used in the resolution of Trading Disputes via an Extra Settlement Determination? (Where it has been necessary to maintain Settlement data in the live operational environment in support of Settlement Runs for the previous 28 months it will be possible to either move this data to archive or use the live operational environment for a further 12 months)</p> <p>(If not please specify an alternative approach)</p>	<p>Response Yes/No Yes</p>	<p>Rationale:</p> <p><i>We believe that only relevant and specific Settlement data such that can be used in the resolution of Trading Disputes via an Extra Settlement Determination should be retained after 28 months where the TDC have determined that a Trading Dispute will not be resolved within the 28 month timescale.</i></p> <p><i>Due to the nature of a Trading Dispute, the period for data to be kept cannot be a fixed period, but will be determined and communicated by the TDC, pursuant to a resolution of the Trading Dispute via an Extra Settlement Determination.</i></p>
Q5	<p>Do you agree that, where data is to be retained in support of an Extra Settlement Determination (i.e beyond 28 months after the Settlement Day) via archive, this Settlement data should be a complete copy of the live operational environment data, or should the archived data be a sub-set of the live operational environment data items required to support Extra Settlement Determinations?</p>	<p>Response Complete Copy / Subset</p>	<p>Rationale:</p> <p><i>We believe that only a sub-set of the live operational environment data items that are relevant and specific to support Extra Settlement Determinations should require to be retained (as specified by the TDC). This will reduce the data retention requirements and reduce the cost burden, which will reduce the "discouraging" factor to any new entrants.</i></p>
	<ul style="list-style-type: none"> – If you believe archived data should be a sub-set of the Settlement data stored in the live operational environment, should this sub-set be prescribed or left under the control of Parties/Party Agents? 	<p>Response Prescribe d / Subset</p>	<p><i>We agree that the type of data should be under the control of Parties/Party Agents to assist Parties to plan and implement a standard archival and deletion policy for their relevant systems that will meet their obligations as well as addressing their performance and storage issues, provided of course that they comply with the minimum retention periods agreed and can support Extra Settlement Determinations where directed by the TDC.</i></p>

No	Question	Response	
	<ul style="list-style-type: none"> - If you believe that the type of data to be archived should be a prescribed sub-set of the data from the live operational environment, please specify the type of data that should be retained? 	--	<p><i>We believe that by prescribing the data, this may not be compatible with Parties and Party Agents standard archival and deletion policy for their relevant systems and may introduce a costly overhead of additional archiving that would prove to be a discouraging factor to new entrants. However, we accept that the TDC will require to specify the minimum set of data required to support an Extra Settlement Determination.</i></p>
Q6	<p>If you have previously been involved in a Trading Dispute that was not resolved during the Settlement timetable (by 14 months after the Settlement Day), what kinds of data have you provided to the TDC?</p>	--	<p><i>Other than under P37, we have not had the requirement to provide data to the TDC.</i></p>
Q7	<p>Do you agree that the costs associated with specifying a minimum archiving frequency outweigh the benefits of a potential increase in the accuracy of Settlement data entering the Trading Disputes process and that therefore it is not necessary to specify the frequency of archiving? (If you believe it is necessary to specify the frequency of archiving, please specify the preferred frequency e.g. monthly, weekly, daily)</p>	<p>Response Yes/No No</p>	<p>Rationale:</p> <p><i>We do not believe this question is relevant as the original intent of this Proposal relates to data retention, not archiving policy. However, in the context of this consultation, we do not agree that the frequency should be specified, rather that the frequency is determined by the individual Party. This will assist Parties to plan and implement a standard archival and deletion policy for their relevant systems that will meet their obligations as well as addressing their performance and storage issues, provided of course that they comply with the minimum retention periods agreed and can support Extra Settlement Determinations where directed by the TDC.</i></p>

No	Question	Response	
Q8	Do you agree that the transfer of data (MOAs and DCs) should relate to live operational data only (I.e. the latest 28 months Settlement Data) or should this also include the additional 12 months Settlement data used to support Extra Settlement Determination?	Response 28 months only /All 40 months	Rationale: <i>We disagree with both options provided, and instead fully support the increase from 3 to 14 month option which was canvassed by CP873: "Changes to the Half Hourly Data Estimation Requirements within the Code SUBSIDIARY documents". The results of this Detail Level Impact Assessment indicated that the majority of respondents agreed with an increase from 3 to 14 months, a small minority requested the Status Quo of 3 months and no respondent favoured the option of "another value should be used". Therefore we view with surprise and concern that only a 28 and 40 month option has been given in this instance.</i>
Q9	Do you agree that if P107 is approved, Parties should be given a three month period to raise any Trading Queries / Trading Disputes that relate to Settlement Days between 20 and 36 months prior to the Implementation Date (i.e. the same amnesty period given at NETA Go-Live)?	Response Yes/No Yes	Rationale: <i>It would seem sensible for Parties to be given a reasonable time to identify Settlement errors and raise Trading Queries.</i>

No	Question	Response
Q10	Do you have any other comments or issues?	<p>Comments:</p> <p><i>For this particular consultation, the imposed timescales have been insufficient to give Parties a proper opportunity to fully consider an appropriate response.</i></p> <p><i>We would agree with the Mod Group that the intention behind P107 is to set down general requirements for data retention in the BSC. These will not cover specific situations where longer data retention timescales are required as a matter of necessity, such as the need to hold data relating to the process for notification error claims established pursuant to P37 until the final determination of the validity of such claims.</i></p> <p><i>We believe that the addition of “an additional 12 months” of data i.e. 28 plus 12, significantly alters the original intention of P107 such that we are unable to support this modification as drafted and would suggest that it now fits the criteria of an “Alternative Modification Proposal”.</i></p> <p><i>However, it is our belief that with minor changes, this proposal could be brought back into line with the original intention of P107 which was to reduce the data retention requirements and thereby better facilitate the Applicable objective of “Promoting effective competition “. Therefore with the following qualifications we would be able to support this proposal.</i></p> <p><i>We agree with the proposal “Up to 28 months”. However, due to the nature of Trading Dispute resolutions, we accept that in certain circumstances, the period for data to be retained cannot be a fixed period, therefore we believe that data should only be retained for specific Settlement periods for Parties where the TDC have indicated that a dispute is unlikely to be resolved within the normal 28 month timescale and that the data should only be held for the purpose of an “Extra Settlement Determination” – as determined and communicated by the TDC to industry. We also accept that the TDC will require to prescribe a minimum set of data that will be required to fulfil their obligation under an Extra Settlement Determination.</i></p>

No	Question	Response
		<p><i>Proposed changes (refer to P107as Section 4 Summary of requirements):</i></p> <p><i>7) BSCCo on behalf of the TDC to notify the industry of those Trading Disputes which are unlikely to be resolved within 28 months of the Settlement Day to which they relate.</i></p> <p><i>8, 9, 10) Replace 40 with 28.</i></p> <p><i>12) Each BSC Party and Party Agent will be required to retain further Settlement data either using the live operational environment or a data archiving mechanism for the purpose of an "Extra Settlement Determination" as indicated by BSCCo on behalf of the TDC.</i></p> <p><i>17) Replace 40 with 28.</i></p> <p><i>19) BSC Agents (CDCA, CRA, ECVAA, SVAA, SAA and FAA) to retain further Settlement data using a data archiving mechanism agreed with BSCCo for the purpose of an "Extra Settlement Determination" as indicated by BSCCo on behalf of the TDC.</i></p>

P107_ASS2_007 – LE Group

Respondent:	Tony Diccico
Responding on Behalf of	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)
Role of Respondent	BSC Party

No	Question	Response	
		Response Yes/No	Rationale
Q1	Do you consider that the refined solution for P107 better facilitates the Applicable BSC Objectives:		
	'(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'?	Not applicable	We do not believe that this objective is applicable to the proposed modification.
	'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'?	Yes	This modification clearly increases efficiency as it reduces the time period for the Raising of Trading Queries / Disputes and defines exact requirements for data retention.

No	Question	Response	
Q2	<p>Do you agree that there should be a cut off for Settlement Runs such that no Settlement Run can be performed more than 28 months after the Settlement Day to which it relates (including removal of the Panel's power to authorise Settlement Runs beyond the normal cut-off)?</p> <p>(If not please specify an alternative approach)</p>	<p>Response</p> <p>Yes</p>	<p>Rationale:</p> <p>28 months after the Settlement Day (14 months after the Final settlement Run) provides ample time for resolving most Trading Disputes which should be triggered by information arising from the Final Settlement Run. Extra Settlement Determinations provide a pragmatic and robust mechanism for resolving Disputes beyond the 28 month window.</p>
Q3	<p>Do you agree that Parties and Party Agents should be obliged to retain 28 months of Settlement data such that they can support a Dispute Final Settlement Run up to 28 months after the Settlement Day to which such Run relates (i.e. in the live operational environment)?</p> <p>(If not please specify an alternative approach)</p>	<p>Response</p> <p>Yes</p>	<p>Rationale:</p> <p>To support Dispute Final Settlement Runs up to 28 months.</p>
Q4	<p>Do you agree that after 28 months, Parties and Party Agents should be obliged to retain Settlement data such that it can be used in the resolution of Trading Disputes via an Extra Settlement Determination? (Where it has been necessary to maintain Settlement data in the live operational environment in support of Settlement Runs for the previous 28 months it will be possible to either move this data to archive or use the live operational environment for a further 12 months)</p> <p>(If not please specify an alternative approach)</p>	<p>Response</p> <p>Yes</p>	<p>Rationale:</p> <p>To support Extra Settlement Determinations beyond 28 months.</p>

No	Question	Response	
Q5	Do you agree that, where data is to be retained in support of an Extra Settlement Determination (i.e beyond 28 months after the Settlement Day) via archive, this Settlement data should be a complete copy of the live operational environment data, or should the archived data be a sub-set of the live operational environment data items required to support Extra Settlement Determinations?	Response Complete Copy	Rationale: Retaining a complete copy of the live operational environment will prevent the introduction of ambiguity into the data retention requirements.
	<ul style="list-style-type: none"> - If you believe archived data should be a sub-set of the Settlement data stored in the live operational environment, should this sub-set be prescribed or left under the control of Parties/Party Agents? 	Response Prescribed / Subset	
	<ul style="list-style-type: none"> - If you believe that the type of data to be archived should be a prescribed sub-set of the data from the live operational environment, please specify the type of data that should be retained? 	--	
Q6	If you have previously been involved in a Trading Dispute that was not resolved during the Settlement timetable (by 14 months after the Settlement Day), what kinds of data have you provided to the TDC?	Not applicable	

No	Question	Response	
Q7	Do you agree that the costs associated with specifying a minimum archiving frequency outweigh the benefits of a potential increase in the accuracy of Settlement data entering the Trading Disputes process and that therefore it is not necessary to specify the frequency of archiving? (If you believe it is necessary to specify the frequency of archiving, please specify the preferred frequency e.g. monthly, weekly, daily)	Response Yes	Rationale: Detailed specification of archiving frequency will only marginally improve the quality of data entering the settlements process. We do not believe that it is necessary to specify the frequency of archiving.
Q8	Do you agree that the transfer of data (MOAs and DCs) should relate to live operational data only (I.e. the latest 28 months Settlement Data) or should this also include the additional 12 months Settlement data used to support Extra Settlement Determination?	Response 28 months only	Rationale: The cost of manually transferring archived data is unlikely to outweigh the benefits of capturing this data for the Trading Disputes process.
Q9	Do you agree that if P107 is approved, Parties should be given a three month period to raise any Trading Queries / Trading Disputes that relate to Settlement Days between 20 and 36 months prior to the Implementation Date (i.e. the same amnesty period given at NETA Go-Live)?	Response Yes	Rationale: Providing sufficient notice is given regarding the implementation date of P107 we do not believe that there is any requirement for an "amnesty period" to cover the transition from the old to the new arrangements.
Q10	Do you have any other comments or issues?	Comments:	