

## Responses from P107 Assessment Consultation

Consultation issued 13 December 2002

Representations were received from the following parties:

No	Company	File Number	No. BSC Parties Represented	No. Non-Parties Represented
1.	TXU Europe	P107_ASS_001	1	
2.	Aquila Networks	P107_ASS_002	1	
3.	Logica CMG	P107_ASS_003		1
4.	British Gas Trading	P107_ASS_004	5	
5.	Scottish and Southern	P107_ASS_005	4	
6.	LE Group	P107_ASS_006	7	
7.	Siemens Energy Services	P107_ASS_007		1
8.	Innogy	P107_ASS_008	7	
9.	STAG & AccuRead	P107_ASS_009		2
10.	Scottish Power	P107_ASS_010	6	
11.	NGC	P107_ASS_011	1	
12.	IMServ Europe	P107_ASS_012	1	

P107\_ASS\_001 – TXU Europe

<b>Respondent:</b>	<i>Sadiq Adam</i>
<b>Responding on Behalf of</b>	<i>TXU-Europe</i>
<b>Role of Respondent</b>	<i>(BSC Party / non-Parties / Part Agent Other (Please specify))</i>

No	Question	Response	
Q1	<b>Do you agree that P107 better facilitates the relevant BSC Objectives:</b>	<b>Response</b>	<b>Rationale</b>
	'(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'?	Yes	
	'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'?		
Q2	<b>Do you agree that the cut-off point for raising Trading Queries/ Trading Disputes should be set at 20 months after the Settlement Day? (If not please specify an alternative time-scale)</b>	<b>Response</b> Yes	<b>Rationale:</b>

No	Question	Response	
Q3	Do you agree that it is not possible to define a cut-off timescale for resolving Trading Queries / Trading Disputes post the Final Settlement Run?	Response Yes	Rationale:
Q4	Do you agree with the proposed process of administering those Trading Queries / Trading Disputes which are unlikely to be resolved within 28 months of the Settlement Day to which they relate? (If not please specify an alternative approach)	Response Yes	Rationale:
Q5	Do you agree that Parties and Party Agents should be obliged to retain 28 months of data in the 'live operational environment' and a further 20 months in a format that can be used in the resolution of Trading Disputes?	Response Yes	Rationale:
Q6	If you do not agree with the timescales proposed in Q5, please specify the appropriate timescale:	Time period (Months)	Rationale:
	1) Live operational environment data retention period.	-	
	2) Archive data retention period.	-	

No	Question	Response	
Q7	<p>What is your organisation's current data retention practice (Please specify both time-scale and method)?</p>	<p><b>Details:</b></p> <p>Live operational environment data retention period = 28 Months</p> <p>Archived Data = 7 Years.</p>	
Q8	<p>Do you agree that CRA, CDCA, SVAA, SAA, FAA and ECVAA should be obliged to retain 28 months of data in the 'live operational environment' followed by a further 20 months in a format that can be used in the resolution of Trading Disputes?</p>	<p><b>Response</b></p> <p>Yes</p>	<p><b>Rationale:</b></p>

No	Question	Response	
Q9	Do you agree that the type data to be retained should:	Response Yes/No	Rationale:
	1) Prescribed for each market participant role type?	Y	
	2) Defined in broad terms ie. 'relevant Settlement data'?	Y	
Q10	Do you agree that where an archiving mechanism is used that the frequency of archiving should be defined? (e.g. daily, monthly etc.)	Response Yes (Weekly)	Rationale:
Q11	Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?	Response Yes	Rationale:

No	Question	Response
Q12	Do you have any other comments or issues?	Comments:

## P107\_ASS\_002 – Aquila Networks

Please find that Aquila Networks Plc response to P107 Assessment Consultation is 'Reject'. Aquila Networks Plc would like to reject this proposal on behalf of metering NHHDC/DA & MO. Aquila is not able to justify the associated costs for this change when the existing data retention rules within the BSCP are clearly defined. We also have concerns over the transfer of data on change of agent, these concerns have already been raised via Jon Spence and the change of agent work group.

regards

Rachael Gardener

Deregulation Control Group &  
Distribution Support Office  
AQUILA NETWORKS

P107\_ASS\_003 – Logica CMG

No comments from SWAE NHHDA/NHHDC

Peter Boak

> LogicaCMG

Outsourcing Services, Data Services Unit



**P107\_ASS\_004 – British Gas Trading**

<b>Respondent:</b>	Mark Manley
<b>Responding on Behalf of</b>	British Gas Trading Ltd, Centrica KL Ltd, Centrica PB Ltd, Regional Power Generators Ltd, Accord Energy Ltd
<b>Role of Respondent</b>	BSC Party/Supplier/Generator/Trader

No	Question	Response	
		Response Yes/No	Rationale
Q1	<b>Do you agree that P107 better facilitates the relevant BSC Objectives:</b>		
	'(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	We do not believe this Modification Proposal will better facilitate this particular BSC Objective.

No	Question	Response	
	'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'?	Yes	<p>We 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 and the consistency of data retention requirements under the BSC by placing obligations on BSC Parties, BSC Agents (Agents) and Party Agents (PA) in relation to the requirements to hold data.</p>

No	Question	Response	
Q2	Do you agree that the cut-off point for raising Trading Queries/ Trading Disputes should be set at 20 months after the Settlement Day? (If not please specify an alternative time-scale)	<p><b>Response</b></p> <p>Yes</p>	<p><b>Rationale:</b></p> <p>This proposal will make the BSC consistent with the BSC Procedure that specifies a requirement to raise Post Final Trading Queries no later than 20 months after the Settlement Day to which the error relates. This would provide a more sensible timescale than that currently specified in the BSC (36 months). This will also be consistent with the timescales that were in place under the P&amp;SA, which had a timescale of 20 months for raising a Post Final Trading Query. To date no Post Final Trading Query has been raised outside of the 20-month window under NETA. Therefore it would appear sensible to maintain the cut off point of 20 months in BSCP11 and amend the timescale in the BSC in line with time frame.</p>

No	Question	Response	
Q3	Do you agree that it is not possible to define a cut-off timescale for resolving Trading Queries / Trading Disputes post the Final Settlement Run?	<p><b>Response</b></p> <p>Yes</p>	<p><b>Rationale:</b></p> <p>We believe it is preferable to define a timescale for the resolution of Disputes this will then remove any issues of inconsistency, as all BSC Parties, Agents and PA will hold data for a definitive period. However after hearing the legal advice at the meeting which stated that it would not be possible to introduce a cut-off point, we agree that it is not possible to define a cut-off. As a consequence of this date could be implicit rather than explicit. This could be achieved by holding 48 months worth of data as a combination of 28 months online and 20 months offline this should be sufficient to process any dispute. The dispute process can then be managed by ELEXON to ensure that any Post Final Dispute is resolved be that rejected or endorsed within the allotted timescale of 48 months.</p>

No	Question	Response	
Q4	Do you agree with the proposed process of administering those Trading Queries / Trading Disputes which are unlikely to be resolved within 28 months of the Settlement Day to which they relate? (If not please specify an alternative approach)	<b>Response</b> <b>Yes/No</b>  <b>No</b>	<b>Rationale:</b>  There does not need to be a special process for disputes that are not processed within a 28-month window of the settlement date in question. As in instances where this occurs the additional period of data that is held offline can be utilised to process the dispute via an Extra Settlement Determination. It is not cost effective to ask BSC Parties, Agents and PA to have a system that in certain circumstances can maintain data on line in excess of the prescribed timescale. Therefore we suggest that a minimum data retention period of 28 months be kept on line irrespective of the circumstances and the remaining 20 months offline. How the BSC Party, Agent or PA chooses to keep the data offline is their decision. The only caveat being that if data is maintained offline that it is retrievable within a prescribed timeframe and usable in supporting the dispute process.

No	Question	Response	
Q5	Do you agree that Parties and Party Agents should be obliged to retain 28 months of data in the 'live operational environment' and a further 20 months in a format that can be used in the resolution of Trading Disputes?	<b>Response</b>  Yes	<b>Rationale:</b>  Please see the answer above. This requirement should be extended to include Agents.
Q6	If you do not agree with the timescales proposed in Q5, please specify the appropriate timescale:	<b>Time period (Months)</b>	<b>Rationale:</b>
	3) Live operational environment data retention period.	N/A	
	4) Archive data retention period.	N/A	

No	Question	Response
Q7	<b>What is your organisation's current data retention practice (Please specify both time-scale and method)?</b>	<b>Details:</b> We currently retain data for a period of 26 months, the settlement output is loaded into the system and maintained on line for the aforementioned period.

No	Question	Response	
Q8	Do you agree that CRA, CDCA, SVAA, SAA, FAA and ECVAA should be obliged to retain 28 months of data in the 'live operational environment' followed by a further 20 months in a format that can be used in the resolution of Trading Disputes?	<p><b>Response</b></p> <p>Yes</p>	<p><b>Rationale:</b></p> <p>The data held by Agents is an integral part of processing a dispute be that via a Post Final Settlement Run or an Extra Settlement Determination. With regard to the timescales of raising a Post Final Trading Query and this being processed by the TDC 4 years worth of data would in the majority of circumstances allow for the processing of a dispute. This would also be true in the majority of instances where a TDC decision was appealed to the BSC Panel. We believe it will be beneficial to clarify the obligations being placed on Agents in terms of the data retention requirements.</p>



No	Question	Response	
Q9	Do you agree that the type data to be retained should:	Response Yes/No	Rationale:
	3) Prescribed for each market participant role type?	No	The nature of disputes can be very wide ranging and to be prescriptive of what data is to be held by each market participant role type would be very difficult if not impossible to ascertain. With regard to Agents to assist with dispute resolution they should be asked to keep all the data that they receive and utilise in a Reconciliation Settlement Run. With regard to PA it is much more difficult to detail what data would be required to support a dispute.
	4) Defined in broad terms ie. 'relevant Settlement data'?	Yes	We favour the generic approach and the requirement should be more broadly defined with the requirement placed on BSC Parties and therefore on PA to hold relevant Settlement data to support the processing of a dispute via a Post Final Settlement Run and or an Extra Settlement Determination.

No	Question	Response	
Q10	Do you agree that where an archiving mechanism is used that the frequency of archiving should be defined? (e.g. daily, monthly etc.)	<b>Response</b>  <b>No</b>	<b>Rationale:</b>  We do not believe that the frequency of archiving should be defined for a number of reasons. Agents, BSC Parties and PA may choose not to archive data and maintain data on line for the full period of 48 months. Secondly, as long as for any Settlement day in question data can be retrieved for a period of 48 months then it is up to the data holder the frequency with which they choose to delete data.
Q11	Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?	<b>Response</b>  <b>Yes</b>	<b>Rationale:</b>  Implementation should be on a Settlement Day basis. If it was implemented on a Calendar Day basis then dependent upon current practices certain BSC Parties, Agents and PA may not be able to comply with the requirements of P107. Consideration will also need to be given if the Modification Proposal was endorsed. The proposed solution will probably place obligations on Agents, BSC Parties and PA to extend their data retention requirements beyond their current working practice. This is a consideration that will need to be undertaken by the Modification Group.

No	Question	Response
Q12	Do you have any other comments or issues?	<p><b>Comments:</b></p> <p>Within Section 2.2 of the Requirements Specification I do not agree with the GSMG Requirement Summary. It is quite possible that a dispute could have some Settlement Days that will be outside of the 20-month window. It is possible to get disputes that last longer than a period of 20 months. The BSC and BSCP11 place obligations on BSC Parties to attempt to resolve the issue with the raising of the Trading Query being as a consequence of the failure of the attempted resolution. Therefore the 20-month window should relate to the last Settlement Day of the disputed period, this in turns illustrates the reasons why 48 months worth of data is required.</p>

## P107\_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 twelve questions listed in the Initial Assessment Consultation Paper, contained within your note of 13th December 2002 concerning Modification Proposals P107, we have the following comments to make:-

Q1 Do you agree that P107 better facilitates the relevant 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??

Yes, for the reasons outlined in the justification for the Modification Proposal but No as P107 is interpreted in the Assessment Document. The Modification does not propose keeping a further 20 months of 'archive data' and did not intend that this should be implied. The only exception for data retention beyond 28 months was for Past Notification Errors. The intention of P107 was to align the BSC with the SVA Agent Service Lines (SLs) but within the context of a suitable disputes framework for all aspects of the BSC. Extending the overall data retention to 48 months will increase costs on BSC Parties and therefore present a barrier to competition especially for small players. Whereas standardising on 28 months would remove the inconsistency between SLs and the BSC and avoid the system and process changes that would be needed for Suppliers (and/or their agents) to ensure that they complied with the current BSC obligations. P63 should not be used to justify 48 months as in determining a period for P63 the Mods Group took the existing 36 months under the BSC and added an arbitrary 12 months. The Mods Group recognised at the time that there were inconsistencies in this area under the BSC but it was deemed to be outside of the scope of P63 to change this. Thus P107 should determine the requirements and, if P63 is approved, the legal text should be changed to be brought in line with P107.

(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements??

Yes, for the reasons outlined in the justification for the Modification Proposal but No as P107 is interpreted in the Assessment Document. See comments on objective (c) above. Increased costs for BSC Agents do not promote efficiency as there is no case that increasing the general timescales will allow any additional resolution of disputes except in very exceptional circumstances.

Q2 Do you agree that the cut-off point for raising Trading Queries/ Trading Disputes should be set at 20 months after the Settlement Day? (If not please specify an alternative time-scale)

Yes, we agree that the cut-off point be set at 20 months after the Settlement Day.

Q3 Do you agree that it is not possible to define a cut-off timescale for resolving Trading Queries / Trading Disputes post the Final Settlement Run?

Our answer is a "Yes, but...". Our rationale is that whilst the dispute may not be resolved there is no reason why there should not be a cut off for submission of evidence and data associated with the dispute.

Q4 Do you agree with the proposed process of administering those Trading Queries / Trading Disputes which are unlikely to be resolved within 28 months of the Settlement Day to which they relate? (If not please specify an alternative approach)

Affected parties should be notified to make special arrangements in these circumstances. It is not appropriate for everyone to retain all data just in case this occurs.

Q5 Do you agree that Parties and Party Agents should be obliged to retain 28 months of data in the live operational environment and a further 20 months in a format that can be used in the resolution of Trading Disputes?

No, 28 months only as per the Modification Proposal. We refer you to our comments above, in Q1, in respect of P63.

Q6 If you do not agree with the timescales proposed in Q5, please specify the appropriate timescale:

1) Live operational environment data retention period.

N/A.

2) Archive data retention period.

Nil. For the avoidance of doubt we believe there is no need for an archive data retention period. In addition it should be noted that restoration from archive is a notoriously flaky process. Applications have often moved on and been modified, which makes restoration to "working Order" expensive and error prone.

Q7 What is your organisation's current data retention practice (Please specify both time-scale and method)?

As a general rule we keep current year plus two years history on live systems, resulting in us meeting the 28 month readings retention period. Although it is technically possible and ideally we would like to keep all old records, we have to periodically purge the database of records older than the period mentioned. There is a rolling programme in place to do this.

For the trading systems, housekeeping follows a similar route but old records are only deleted when it is absolutely necessary for operational purposes.

For statutory financial purposes we do need to keep a much longer record.

Our systems are centered around a relational database so simply 'archiving' tables - without the linkages would be of little value. Rather than keeping a full archive - we keep an electronic facsimile copy of most bills created by our system in an application called 'On Demand'. This means we can recreate the customer record should the need arise on a 'one by one' basis. All information presented on the bill is of course retained.

Therefore we can provide data for settlement dispute purposes - although it might not be restored in exactly the same way as it was originally presented.

Q8 Do you agree that CRA, CDCA, SVAA, SAA, FAA and ECVAA should be obliged to retain 28 months of data in the live operational environment? followed by a further 20 months in a format that can be used in the resolution of Trading Disputes?

NO - but only on the basis we disagree with the 20 months. Whatever the period, all agents and parties should keep the same as the requirements should be consistent with Parties and Party Agents (see comments above).

Q9 Do you agree that the type data to be retained should:

1) Prescribed for each market participant role type?

No. We do not believe this is appropriate because it would become unnecessarily prescriptive. What should be prescribed is the overall requirement only.

2) Defined in broad terms ie. relevant Settlement data?

Yes. It should be defined in broad terms.

Q10 Do you agree that where an archiving mechanism is used that the frequency of archiving should be defined? (e.g. daily, monthly etc.)

No. The archiving routines should be left to participants - this should be of no great consequence, provided the data is available.

Q11 Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?

Yes provided the Settlement Date is 27 March 2001. Any later date would leave the current inconsistency in place for those earlier Settlement Dates. Providing a determination is made and implemented before 27 July 2003 from Settlement Date 27 March 2001 the current inconsistency will have no practical effect.

Q12 Do you have any other comments or issues?

The answers to Questions 9 and 10 are given to be helpful they should not be interpreted as being in conflict with our rejection of the 'global 20 month archiving' requirement as stated in our answers to Question 1 and Question 5/6.

The introduction of the general archiving requirement is inconsistent with the original Modification that states that the aim is to clarify that no data is needed to be retained after 28 months except in exceptional circumstances. The introduction of this substantial additional requirement undermines the original rationale for raising the Mod as it removes the benefits of reduced costs that would support BSC Objectives (c) and (d).

Regards

Garth Graham  
Scottish & Southern Energy plc

**P107\_ASS\_006 – 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

No	Question	Response	
		Response Yes/No	Rationale
Q1	<b>Do you agree that P107 better facilitates the relevant BSC Objectives:</b>		
	'(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.
Q2	<b>Do you agree that the cut-off point for raising Trading Queries/ Trading Disputes should be set at 20 months after the Settlement Day? (If not please specify an alternative time-scale)</b>	Yes	20 months after the Settlement Day (6 months after the Final settlement Run) provides ample time for raising a Trading Query / Dispute which should be triggered by information arising from the Final Settlement Run.



No	Question	Response	
Q3	Do you agree that it is not possible to define a cut-off timescale for resolving Trading Queries / Trading Disputes post the Final Settlement Run?	No	Providing there is a provision for special cases where agreement cannot be reached in the cut-off timescale there is no reason why a cut-off timescale consistent with the duration of the majority of Trading Query / Trading Dispute resolutions can not be introduced to specify standard data retention requirements
Q4	Do you agree with the proposed process of administering those Trading Queries / Trading Disputes which are unlikely to be resolved within 28 months of the Settlement Day to which they relate? (If not please specify an alternative approach)	Yes	Introducing a notification procedure through Elexon on behalf of the TDC to notify the industry of those Queries / Disputes that are unlikely to be resolved in the 28 month timescale is similar in approach to notifications provided to relevant Parties relating to PNE claims and seems appropriate
Q5	Do you agree that Parties and Party Agents should be obliged to retain 28 months of data in the 'live operational environment' and a further 20 months in a format that can be used in the resolution of Trading Disputes?	Yes	There appears to be no good reason why parties should not retain data for either 48 months in a live operational environment or 28 months in a live operational environment and 20 months in an archive
Q6	If you do not agree with the timescales proposed in Q5, please specify the appropriate timescale:	Not applicable	Not applicable
	5) Live operational environment data retention period.		

No	Question	Response	
	6) Archive data retention period.		
Q7	<b>What is your organisation's current data retention practice (Please specify both time-scale and method)?</b>	Settlement Data – all data stored in a live operational environment ECVNA / MVRNA – all data stored in live operational system	
Q8	<b>Do you agree that CRA, CDCA, SVAA, SAA, FAA and ECVAA should be obliged to retain 28 months of data in the 'live operational environment' followed by a further 20 months in a format that can be used in the resolution of Trading Disputes?</b>	Yes	

No	Question	Response	
Q9	Do you agree that the type data to be retained should:	Response Yes/No	Rationale:
	5) Prescribed for each market participant role type?	No	
	6) Defined in broad terms ie. 'relevant Settlement data'?	Yes	It would seem more efficient to retain a broad "relevant settlement data" obligation for data retention rather than be prescriptive. This would avoid unnecessary system changes.
Q10	Do you agree that where an archiving mechanism is used that the frequency of archiving should be defined? (e.g. daily, monthly etc.)	No	Providing Parties, Party Agents and / or BSC Agents can supply relevant data to the Trading Dispute / Trading Query process in a timely fashion there seems no reason to define the frequency of the archiving mechanism. In some cases it may be more effective to retain the data for 48 months in live operational systems rather than build separate archiving capability.

No	Question	Response	
Q11	Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?	Yes	
Q12	Do you have any other comments or issues?	Comments:	

**P107\_ASS\_007 – Siemens Energy Services Ltd**

The attached document contains responses from Non Half Hourly (in blue) and Half Hourly (in red) business areas. These are largely the same but do diverge in a few cases.

<b>Respondent:</b>	<i>Name</i> Paul McClennan
<b>Responding on Behalf of</b>	<i>Please list all Parties / non-Parties / Party Agent responding on behalf of (including the respondent company if relevant).</i> Siemens Energy Services Limited (as EELC and EMEB)
<b>Role of Respondent</b>	<i>(BSC Party / non-Parties / Part Agent Other (Please specify))</i> Party Agent: NHHDA

No	Question	Response	
		Response Yes/No	Rationale
Q1	<b>Do you agree that P107 better facilitates the relevant BSC Objectives:</b>		
	'(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'?	Yes Yes	Providing all parties (Suppliers, Agents, Distributors etc) take responsibility for their data and understand the same. It should not be the onus of an Agent to explain misunderstandings.
	'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'?	Yes Yes	(see above)

No	Question	Response	
Q2	Do you agree that the cut-off point for raising Trading Queries/ Trading Disputes should be set at 20 months after the Settlement Day? (If not please specify an alternative time-scale)	<b>Response Yes/No</b>  Yes  Yes	<b>Rationale:</b>  (see below)
Q3	Do you agree that it is not possible to define a cut-off timescale for resolving Trading Queries / Trading Disputes post the Final Settlement Run?	<b>Response Yes/No</b>  No  Yes	<b>Rationale:</b>  20 months post Settlement Day is adequate. From a Business perspective, you should be aware of your assets and financial commitments. If a Trading Query or Dispute had an indefinite timescale applied neither could be lucrative.
Q4	Do you agree with the proposed process of administering those Trading Queries / Trading Disputes which are unlikely to be resolved within 28 months of the Settlement Day to which they relate? (If not please specify an alternative approach)	<b>Response Yes/No</b>  Yes  Yes	<b>Rationale:</b>

No	Question	Response	
Q5	Do you agree that Parties and Party Agents should be obliged to retain 28 months of data in the 'live operational environment' and a further 20 months in a format that can be used in the resolution of Trading Disputes?	<b>Response Yes/No</b>  Yes  No	<b>Rationale:</b>  Yes to both questions provided this is possible using the data in the live environment. Retention of data offline i.e. on tape for 48 months would be prohibitively expensive  No, for HH metering retain 17 months live environment, followed by 31 months archive environment. Remove from archive environment to tape and retain for further 53 months (audit requirement).
Q6	If you do not agree with the timescales proposed in Q5, please specify the appropriate timescale:	<b>Time period (Months)</b>	<b>Rationale:</b>
	7) Live operational environment data retention period.		See above
	8) Archive data retention period.		See answer to Q5 above  See above

No	Question	Response	
Q7	What is your organisation's current data retention practice (Please specify both time-scale and method)?	<p><b>Details:</b></p> <p>Relevant settlement data retained indefinitely in the live NHHDA database tables and flat files.</p> <p>All database backups are kept for a period of 1 month. All file system backups are kept for 1 week. Adhoc 27month backup of NHHDA flat files when required.</p> <p>HH - Indefinitely on live environment.</p>	
Q8	Do you agree that CRA, CDCA, SVAA, SAA, FAA and ECVAA should be obliged to retain 28 months of data in the 'live operational environment' followed by a further 20 months in a format that can be used in the resolution of Trading Disputes?	<p><b>Response</b></p> <p><b>Yes/No</b></p> <p>Yes</p> <p>Yes</p>	<p><b>Rationale:</b></p> <p>Yes, for immediate analysis of data queries, prior to contacting the `role type`. There may be instances where one of the parties shown in Q8 can resolve a dispute and clarify their resolution with the relevant `role type` from data sets held in their `live environment` or from archived data. This leaves the `role type` to undertake their daily responsibilities without any impact.</p>



No	Question	Response	
Q9	<p>Do you agree that the type data to be retained should:</p> <p>7) Prescribed for each market participant role type?</p> <p>8) Defined in broad terms ie. 'relevant Settlement data'?</p>	<p>Response Yes/No</p> <p>No</p> <p>Yes</p>	<p>Rationale:</p> <p>No, see 2) below.</p> <p>Yes, as `relevant Settlement data` may include data from both DC and DA Agent Roles, if both parties are appointed. Queries for a Settlement day where both parties are involved can be analysed as a whole data set rather than two data sets, pertinent to `role type` DC and `role type` DA.</p>
Q10	<p>Do you agree that where an archiving mechanism is used that the frequency of archiving should be defined? (e.g. daily, monthly etc.)</p>	<p>Response Yes/No</p> <p>Yes</p> <p>yes</p>	<p>Rationale:</p> <p>If to tape then monthly archive.</p>

No	Question	Response	
Q11	Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?	<p><b>Response</b> Yes/No</p> <p>Yes</p>	<p><b>Rationale:</b></p> <p>Yes as disputes are identified by Settlement Day and archiving should following the same schema.</p>
Q12	Do you have any other comments or issues?	<p><b>Comments:</b> From data sets held in those systems identified by Parties in Q8, these parties could be more proactive in their approach to both Agents and Suppliers in resolving a dispute.</p>	

**P107\_ASS\_008 – Innogy**

<b>Respondent:</b>	<i>Name</i>
<b>Responding on Behalf of</b>	Innogy plc, npower Limited, Innogy Cogen Trading Limited, Innogy Cogen Limited, npower Direct Limited, npower Northern Limited, npower Yorkshire Limited
<b>Role of Respondent</b>	<i>(BSC Party / non-Parties / Part Agent Other (Please specify))</i>

No	Question	Response	
Q1	<b>Do you agree that P107 better facilitates the relevant BSC Objectives:</b>	<b>Response Yes/No</b>	<b>Rationale</b>
	'(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>No</b>	Retention of data does not promote competition in generation and supply of electricity. It can also be argued that the timescales for raising disputes do not necessary promote competition in the generation and supply of electricity.
	'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'?	<b>Yes</b>	Due to the increased efficiency of raising trading queries and trading disputes.
Q2	<b>Do you agree that the cut-off point for raising Trading Queries/ Trading Disputes should be set at 20 months after the Settlement Day? (If not please specify an alternative time-scale)</b>	<b>Response Yes/No</b>  <b>Yes</b>	<b>Rationale:</b>

No	Question	Response	
Q3	Do you agree that it is not possible to define a cut-off timescale for resolving Trading Queries / Trading Disputes post the Final Settlement Run?	<b>Response</b> <b>Yes/No</b>  <b>Yes</b>	<b>Rationale:</b>  Some Trading Disputes are very complex and often involve a number of Parties.
Q4	Do you agree with the proposed process of administering those Trading Queries / Trading Disputes which are unlikely to be resolved within 28 months of the Settlement Day to which they relate? (If not please specify an alternative approach)	<b>Response</b> <b>Yes/No</b>  <b>Yes</b>	<b>Rationale:</b>  As long as it is just notification and Extra-Settlement Determination is not invoked just because the dispute has reached the 28 month mark.
Q5	Do you agree that Parties and Party Agents should be obliged to retain 28 months of data in the 'live operational environment' and a further 20 months in a format that can be used in the resolution of Trading Disputes?	<b>Response</b> <b>Yes/No</b>  <b>Yes</b>	<b>Rationale:</b>  Although often disputes arise over missing data so it would not matter the duration of the retention period.
Q6	If you do not agree with the timescales proposed in Q5, please specify the appropriate timescale:	<b>Time period (Months)</b>	<b>Rationale:</b>
	9) Live operational environment data retention period.		
	10) Archive data retention period.		

No	Question	Response	
Q7	What is your organisation's current data retention practice (Please specify both time-scale and method)?	<p><b>Details:</b></p> <p>Online in data warehouse.</p> <p>In excess of 48 months to be kept online.</p>	
Q8	Do you agree that CRA, CDCA, SVAA, SAA, FAA and ECVAA should be obliged to retain 28 months of data in the 'live operational environment' followed by a further 20 months in a format that can be used in the resolution of Trading Disputes?	<p><b>Response</b></p> <p>Yes/No</p> <p>Yes</p>	<p><b>Rationale:</b></p>

No	Question	Response	
Q9	Do you agree that the type data to be retained should:	Response Yes/No	Rationale:
	9) Prescribed for each market participant role type?	Yes	
	10) Defined in broad terms ie. 'relevant Settlement data'?	Yes	
Q10	Do you agree that where an archiving mechanism is used that the frequency of archiving should be defined? (e.g. daily, monthly etc.)	Response Yes/No  No	Rationale:  It should be done to the individual party as long as they meet the overall requirements.
Q11	Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?	Response Yes/No  Yes	Rationale:

No	Question	Response
Q12	Do you have any other comments or issues?	Comments:

**P107\_ASS\_009 – STAG & Accuread**

On behalf of STAG and AccuRead, the only point I would like to make at this stage is that we feel the type of data to be retained 'should' be prescribed, as opposed to a generic definition of the relevant Settlement date. This will help remove any element of ambiguity and assist us in meeting our obligations.

Many thanks,  
Julia

Julia Cabras  
Electricity Co-ordinator (DA)



P107\_ASS\_010 – Scottish Power

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

No	Question	Response	
Q1	Do you agree that P107 better facilitates the relevant 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'?	<b>No</b>	<p>We do not believe that <u>this</u> version of P107, i.e. as drafted in this consultation, better facilitates the Applicable Objective of " Promoting effective competition...." as by introducing a longer data retention period compared with that currently in place, increases the cost burden on market participants and, therefore, is a discouraging factor to any new entrants.</p> <p>However, we believe the original intent of P107, to impose a maximum data retention period of 28 months, in line with other industry requirements, would reduce the cost burden, encourage new entrants and better the facilitation of this BSC Objective.</p>

No	Question	Response	
	<p>'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements?'</p>	<p><b>No</b></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 archiving and retrieval requirements, the costs to market participants could be increased significantly through the need to enhance the archiving routines in their operational systems</i></p> <p><i>However, we believe the original P107 which requires a maximum data retention of 28 months, with specific cut off points for different processes and in line with other industry requirements, would make the process much more efficient.</i></p>
<p><b>Q2</b></p>	<p><b>Do you agree that the cut-off point for raising Trading Queries/ Trading Disputes should be set at 20 months after the Settlement Day? (If not please specify an alternative time-scale)</b></p>	<p><b>Response Yes/No  YES</b></p>	<p><b>Rationale:</b></p> <p><i>We believe it is appropriate to have a degree of finality in respect of the resolution of Trading Disputes. The proposed timescales in P107, which would provide Parties with the opportunity to raise disputes up to a maximum of 20 months after the relevant Settlement Date effects to 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>

No	Question	Response	
Q3	Do you agree that it is not possible to define a cut-off timescale for resolving Trading Queries / Trading Disputes post the Final Settlement Run?	<b>Response</b> <b>Yes/No</b>  <b>NO</b>	<b>Rationale:</b> <i>We believe that the proposed 28 month 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> <i>However, We agree with the GSMG that there may be limited instances whereby a Trading Dispute is not resolved within these timescales and therefore we concur with their proposal that these should be treated as "Special Cases" and resolved using a similar approach to the "Past Notification Error Claims".</i>
Q4	Do you agree with the proposed process of administering those Trading Queries / Trading Disputes which are unlikely to be resolved within 28 months of the Settlement Day to which they relate? (If not please specify an alternative approach)	<b>Response</b> <b>Yes/No</b>  <b>YES</b>	<b>Rationale:</b> <i>We agree with the GSMG that there may be limited instances whereby a Trading Dispute is not resolved within these timescales. We therefore concur with their proposal that they should be treated as "Special Cases" and resolved using a similar approach to the " Past Notification Error Claims".</i>

No	Question	Response	
Q5	Do you agree that Parties and Party Agents should be obliged to retain 28 months of data in the 'live operational environment' and a further 20 months in a format that can be used in the resolution of Trading Disputes?	<b>Response</b> <b>Yes/No</b>  <b>NO</b>	<b>Rationale:</b> <i>We disagree with the addition of "a further 20 months" to this proposal, as we believe that this is against the principle that this proposal was raised to address i.e. to increase dispute resolution efficiency; to reduce the requirement to retain data and to be consistent with other industry documentation. We support the P107 proposer's assertion that significant data retention costs are an unfortunate side effect of the inefficiency of the disputes process and that the original proposed 28 months should remain, together with the "Special Cases" to cover the limited instances of greater than 28 months. If the cut off points are in place, there should not be a requirement for longer retention except for the limited "Special Cases".</i>
Q6	If you do not agree with the timescales proposed in Q5, please specify the appropriate timescale:	<b>Time</b> <b>period</b> <b>(Months)</b>	<b>Rationale:</b>

No	Question	Response	
	11) Live operational environment data retention period.	<b>24 Months</b>	<p><i>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. 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>
	12) Archive data retention period.	<b>4 Months</b>	<i>This is covered within our answer to part 1 above.</i>
Q7	<b>What is your organisation's current data retention practice (Please specify both time-scale and method)?</b>	<b>Details:</b> <i>Core data is held on-line which is in line with current requirements.</i>	

No	Question	Response	
Q8	Do you agree that CRA, CDCA, SVAA, SAA, FAA and ECVAA should be obliged to retain 28 months of data in the 'live operational environment' followed by a further 20 months in a format that can be used in the resolution of Trading Disputes?	Response Yes/No  <b>NO</b>	<b>Rationale:</b> <i>We disagree with the addition of "a further 20 months" to this proposal, as we believe that this is against the principle that this proposal was raised to address i.e. to increase dispute resolution efficiency; to reduce the requirement to retain data and to be consistent with other industry documentation. We support the P107 proposer's assertion that significant data retention costs are an unfortunate side effect of the inefficiency of the disputes process and that the original proposed 28 months should remain, together with the "Special Cases" to cover the limited instances of greater than 28 months. If the cut off points are in place, there should not be a requirement for longer retention except for the limited "Special Cases".</i>

No	Question	Response	
Q9	Do you agree that the type of data to be retained should:	Response Yes/No	<b>Rationale:</b>
	11) Prescribed for each market participant role type?	<b>NO</b>	<i>We do not agree, as we believe that the data will be too complex and difficult to define, which would result in ambiguity.</i>
	12) Defined in broad terms ie. 'relevant Settlement data'?	<b>YES</b>	<i>Refer to our comments above. Also, we agree that the type of data should be defined in broad terms 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.</i>

No	Question	Response	
Q10	Do you agree that where an archiving mechanism is used that the frequency of archiving should be defined? (e.g. daily, monthly etc.)	<b>Response</b> <b>Yes/No</b>  <b>NO</b>	<b>Rationale:</b> <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 derived 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.</i>
Q11	Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?	<b>Response</b> <b>Yes/No</b>  <b>Yes</b>	<b>Rationale:</b> <i>We believe that P107 should have a prospective implementation date (Settlement Day) rather than a possible retrospective impact (Calendar Day implementation). The impact of Calendar Day implementation will be to have used up 14 months of the projected 20 months available in which to raise a dispute, e.g. if P107 was implemented on 30 April 2003, a Settlement error relating to the Settlement Day exactly 14 months previously would have to be picked up within the following six months. Under current timescales, there would be a further 22 months in which to pick up that error and raise a dispute. This is as much to do with providing BSC Parties with certainty about how long they need to hold data for particular Settlement Days. A clear cut-off point would allow Parties to plan their data retention requirements more adequately.</i>

No	Question	Response
Q12	Do you have any other comments or issues?	<p><b>Comments:</b></p> <p><i>We believe that the addition of "a further 20 months" significantly alters the original intention of P107 such that the proposal as now drafted should be treated as an alternative modification. This should be progressed in parallel with the original drafting of modification P107 which itself should be extended to include "Special Cases" as defined by GSMG.</i></p> <p><i>Also it is our understanding that when assessing P63, the VAMG sought only to achieve consistency between the various data transfer requirements at Change of Agent. VAMG originally agreed to "up to 48 months" (i.e. if you happen to have that much data) because it was a compromise between "all data" and "the last 2 meter readings". CP842 was raised to implement the consistency desired by the VAMG but was rejected by SVG because the 48 months had become a firm requirement and was seen to be excessive, and P107 was raised to establish a more reasonable level. The VAMG intention was that CP842/P107 should drive the retention period but now it seems that P107 is being driven by P63. It seems that P63 has not implemented the underlying VAMG intention and there has been no logical argument as to why 48 months is better than, say, 36 or even 28. In fact, section 2.4.2 of the Requirements Specification is quite clear in sub paragraphs (a) and (b) that historical data is only required for 28 months for transferring to a new agent. This is what the data transfer requirements in P63 were all about and it seems from this that 48 months is not needed for that purpose - so why the increase to 48? If P63 has been implemented in a flawed manner, it would be better not to compound that flaw but rather we should correct the problem through P107 (using 28 months, not 48).</i></p> <p><i>We further believe that the imposition of a further 20 months would have a significant impact on Market Domain Data (MDD), which defines valid Settlement Dates. We believe it would be necessary to extend this definition to include "the previous 48 months", were this proposal to succeed in its current form. The result would be a need to transfer much greater volumes of data through the Data Transfer Network.</i></p>



P107\_ASS\_011 – NGC

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

No	Question	Response	
		Response Yes/No	Rationale
Q1	<b>Do you agree that P107 better facilitates the relevant BSC Objectives:</b>		
	'(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	Reduction of timescales for archived data.
Q2	<b>Do you agree that the cut-off point for raising Trading Queries/ Trading Disputes should be set at 20 months after the Settlement Day? (If not please specify an alternative time-scale)</b>	Response Yes	Rationale: Disputes typically raised/resolved within this timescale

No	Question	Response	
Q3	Do you agree that it is not possible to define a cut-off timescale for resolving Trading Queries / Trading Disputes post the Final Settlement Run?	<b>Response</b> Yes	<b>Rationale:</b> Agree most Trading Disputes would be resolved within 28 months of the Settlement Day to which they relate and therefore those which would not be resolved within 28 months of the Settlement Day could be treated as 'special cases'.
Q4	Do you agree with the proposed process of administering those Trading Queries / Trading Disputes which are unlikely to be resolved within 28 months of the Settlement Day to which they relate? (If not please specify an alternative approach)	<b>Response</b> Yes	<b>Rationale:</b> If disputes have been raised and will not be resolved within 29months appropriate arrangements can be made to retain Settlement data
Q5	Do you agree that Parties and Party Agents should be obliged to retain 28 months of data in the 'live operational environment' and a further 20 months in a format that can be used in the resolution of Trading Disputes?	<b>Response</b> Yes	<b>Rationale:</b> For disputes to be processed in an efficient manner, having data available in a 'live' environment would promote efficient resolution.
Q6	If you do not agree with the timescales proposed in Q5, please specify the appropriate timescale:	<b>Time period</b> <b>(Months)</b>	<b>Rationale:</b>
	13) Live operational environment data retention period.		
	14) Archive data retention period.		

No	Question	Response	
Q7	<p>What is your organisation's current data retention practice (Please specify both time-scale and method)?</p>	<p><b>Details:</b></p> <p>Settlement Data retention in electronic format is maintained for 8 years. Data can be retrieved into Operational Systems from tape. In addition supporting information may be in hard copy form also maintained for 8 years.</p>	
Q8	<p>Do you agree that CRA, CDCA, SVAA, SAA, FAA and ECVAA should be obliged to retain 28 months of data in the 'live operational environment' followed by a further 20 months in a format that can be used in the resolution of Trading Disputes?</p>	<p><b>Response</b> Yes/No</p>	<p><b>Rationale:</b> No specific view</p>

No	Question	Response	
Q9	Do you agree that the type data to be retained should:	Response Yes/No	Rationale:
	13) Prescribed for each market participant role type?	Yes	To ensure participants are aware of their obligations
	14) Defined in broad terms ie. 'relevant Settlement data'?		
Q10	Do you agree that where an archiving mechanism is used that the frequency of archiving should be defined? (e.g. daily, monthly etc.)	Response No	Rationale: It should be the responsibility of the participants
Q11	Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?	Response Yes	Rationale:

No	Question	Response
Q12	Do you have any other comments or issues?	Comments:  The Transmission Company data retention requirements are not referenced.

P107\_ASS\_012 – IMServ

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

No	Question	Response	
		Response Yes/No	Rationale
Q1	<b>Do you agree that P107 better facilitates the relevant BSC Objectives:</b>		
	'(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.
Q2	<b>Do you agree that the cut-off point for raising Trading Queries/ Trading Disputes should be set at 20 months after the Settlement Day? (If not please specify an alternative time-scale)</b>	Response Yes/No	Rationale:

No	Question	Response	
Q3	Do you agree that it is not possible to define a cut-off timescale for resolving Trading Queries / Trading Disputes post the Final Settlement Run?	Response Yes/No  No	Rationale:  There should be a time limit set.
Q4	Do you agree with the proposed process of administering those Trading Queries / Trading Disputes which are unlikely to be resolved within 28 months of the Settlement Day to which they relate? (If not please specify an alternative approach)	Response Yes/No  Yes	Rationale:
Q5	Do you agree that Parties and Party Agents should be obliged to retain 28 months of data in the 'live operational environment' and a further 20 months in a format that can be used in the resolution of Trading Disputes?	Response Yes/No  No	Rationale:  Level of queries on data over 24 months old does not justify expense of keeping on-line
Q6	If you do not agree with the timescales proposed in Q5, please specify the appropriate timescale:	Time period (Months)	Rationale:
	15) Live operational environment data retention period.	24	
	16) Archive data retention period.	48	

No	Question	Response	
Q7	What is your organisation's current data retention practice (Please specify both time-scale and method)?	Details: Data kept on the live system for a minimum of 24 months, then archived in an independent, retrievable format and placed in a secure location.	
Q8	Do you agree that CRA, CDCA, SVAA, SAA, FAA and ECVAA should be obliged to retain 28 months of data in the 'live operational environment' followed by a further 20 months in a format that can be used in the resolution of Trading Disputes?	Response Yes/No	Rationale:



No	Question	Response	
Q9	Do you agree that the type data to be retained should:	Response Yes/No	Rationale:
	15) Prescribed for each market participant role type?	No	
	16) Defined in broad terms ie. 'relevant Settlement data'?	Yes	
Q10	Do you agree that where an archiving mechanism is used that the frequency of archiving should be defined? (e.g. daily, monthly etc.)	Response Yes/No  No	Rationale:  Time limits should be set but implementation of the archiving process left to the participant to define.
Q11	Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?	Response Yes/No  Yes	Rationale:

No	Question	Response
Q12	Do you have any other comments or issues?	Comments: