

February 2003

**ASSESSMENT REPORT**  
**MODIFICATION PROPOSAL P107–**  
Data Retention Requirements for Post-Final  
Trading Disputes

Prepared by the GSMG on behalf of the Balancing  
and Settlement Code Panel

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## I DOCUMENT CONTROL

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### b Distribution

Name	Organisation
GSMG	
BSC Panel	

### c Related Documents

Reference 1	Modification Proposal P107 'Data Retention Requirements for Post-Final Trading Disputes' (30 October 2002)
Reference 2	Initial Written Assessment of Modification Proposal P107 'Initial Assessment Of Modification Proposal P107 - Data Retention Requirements for Post-Final Trading Disputes (P107IR V1.0, 8 November 2002)
Reference 3	Panel 52/017 'Initial Written Assessment Modification Proposal P107: Data Retention Requirements For Post-Final Trading Disputes', 14 November 2002
Reference 4	Version 1.0, Requirements Specification Initial Assessment of Modification Proposal P107 - Data Retention Requirements for Post-Final Trading Dispute' (P107AS), 13 December 2002
Reference 5	Consultation Papers (consisting of consultation request and questionnaire and Requirements Specification), 13 December 2002
Reference 6	Software Technical Advisory Group Minutes 32, 28 November 2002
Reference 7	Consultation Papers (consisting of consultation request and questionnaire and Requirements Specification), 28 January 2003
Reference 8	MC00037: Detailed Level Impact Assessment of P107 'Data Retention Requirements for Post Final Trading Disputes
Reference 9	Version 2.0, Requirements Specification Initial Assessment of Modification Proposal P107 - Data Retention Requirements for Post-Final Trading Dispute' (P107AS), 28 January 2003
Reference 10	Modification Report, Modification Proposal P61 – Ad Hoc Adjustments to Settlement involving material errors without resorting to Ad Hoc Settlement Runs (MR 44/004 V2.0, 17 May 2002)
Reference 11	Modification Report, Modification Proposal P63 - Modification Proposal P63 – Change of Contract Management of MPAN's for Data Collector, Data Aggregator And Meter Operator

Reference 12	BSCP11 'Volume Allocation and Settlement Run Queries'
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## 1 SUMMARY AND RECOMMENDATIONS

### 1.1 Recommendations

On the basis of the analysis, consultation and assessment undertaken in respect of this Modification Proposal during the Assessment Procedure, and the resultant findings of this Assessment Report, the Modification Group recommends that the Balancing and Settlement Code Panel ('the Panel') should:

- **AGREE that the Proposed Modification P107 should be made;**
- **AGREE a provisional Implementation Date for the Proposed Modification P107 of 26 November 2003 subject to an Authority determination by 1 August 2003. Alternatively should an Authority determination be received after this date, but prior to 26 November 2003 then the Implementation Date should be 24 February 2004;**
- **AGREE that if approved P102 should be implemented on a calendar day basis, such that if approved Settlement Runs and Volume Allocation Runs carried out after the Implementation Date of such Approval Notification, in respect of Settlement Days prior to that date, should be carried out taking account of P107; and**
- **AGREE that the draft Modification Report be issued for consultation and submitted to the Panel Meeting on 13 March 2003.**

### 1.2 Background

Modification Proposal P107 'Data Retention Requirements for Post-Final Trading Disputes', (Reference 1), was submitted on 30 October 2002 by SSE Energy Supply Limited, in accordance with Section F, 2.1.1 of the Balancing and Settlement Code ('the Code').

P107 seeks to refine the existing cut-off points defined within the Code, associated with raising and resolving a Trading Dispute post the Final Settlement Run. P107 also seeks to include within the Code appropriate data retention obligations on Parties, Party Agent and relevant BSC Agents. In addition P107 seeks to implement appropriate data transfer arrangements. To achieve this, the GSMG have agreed that:

- The cut-off point for raising a Trading Query should be 20 months after the Settlement Day.
- The cut-off point for a Post-Final Settlement Run should be 28 months after the Settlement Day.
- The existing ability of the Panel to authorise Settlement Runs beyond the normal cut-off (28 months under P107), as detailed in Section U2.2.4 of the Code, should be removed effective for all Settlement Runs carried out following implementation of P107 (ie. a calendar day implementation).
- No cut-off point will be specified for undertaking an Extra-Settlement Determination. However under normal circumstances these will be undertaken by 40 months after the Settlement Day.
- Parties, Party Agents and the relevant BSC Agents will be required to retain a minimum of 40 months of Settlement data (with 28 months being retained in the live operational environment

and the further 12 months being retained either in the live operational environment or using an appropriate archiving mechanism).

- The above requirements should not compromise the Past Notification Error (P6) or the large Annualised Advance (AA) / Estimate Annual Consumption (EAC) issue.

Following agreement by the Panel on 14 November 2002 (Panel 52/017) (Reference 3), P107 was submitted to a three month Assessment Procedure. The Governance Standing Modification Group (GSMG) (supported by the Settlement Standing Modification Group, the Volume Allocation Standing Modification Group and the Trading Disputes Committee (TDC)) has progressed P107 through the Assessment Procedure.

### **1.3 Rationale for Recommendations**

The GSMG's rationale for recommending approval of P107 is that the current protracted nature of the process outlined in the Code for raising Post-Final Trading Queries / Trading Disputes implies onerous and expensive data retention requirements for Parties, Party Agents and BSC Agents and is inconsistent with industry working practices (both in terms of when Post-Final Trading Queries / Trading Disputes are raised and resolved and also in terms of how much data is retained by the industry).

It was the view of the GSMG that implementing P107 would introduce certainty into the Trading Disputes process and bring the Code closer to existing industry practice, thereby better facilitating achievement of the Applicable BSC Objective (d):

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

It was noted by the GSMG that a minority of consultation responses indicated that P107 could also better facilitate Applicable BSC Objective (c):

*(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'*

on the basis that P107 will result in reduced data retention costs for BSC Agents, thus better facilitating the achievement of Applicable BSC Objective. However it was the view of the GSMG that P107 would not have an effect on Applicable BSC Objective (c).

In conclusion the GSMG agreed that, P107 would better facilitate the Applicable BSC Objective (d) and should be made.

It is intended that, if P107 be approved, Settlement Runs and Volume Allocation Runs carried out after the Implementation Date of such Approval Notification, in respect of Settlement Days prior to that date, should be carried out taking account of P107. Therefore the GSMG agreed that P107, if approved, should be implemented on a calendar day basis. The GSMG believed that this approach was necessary to address the defect identified by P107. The GSMG agreed that this rule change would not affect the behaviour of industry participants in a way that would distort the market in their favour, nor would it affect the expected material outcome of the rectification process.

## **2 INTRODUCTION**

This Report has been prepared by ELEXON Ltd. on behalf of the Panel in accordance with the terms of the Code. The Code is the legal document containing the rules of the balancing mechanism and

imbalance settlement process and related governance provisions. ELEXON is the company that performs the role and functions of the BSCCo, as defined in the Code.

An electronic copy of this document can be found on the BSC Website, at [www.elexon.co.uk](http://www.elexon.co.uk).

### 3 MODIFICATION GROUP DETAILS

This Assessment Report has been prepared by the GSMG. The Membership of the GSMG was as follows:

<b>Member</b>	<b>Organisation</b>
Gareth Forrester	ELEXON (Chairman)
Ceri Hughes	ELEXON (Lead Analyst)
Thomas Bowcutt	ELEXON
Christina Kennedy	ELEXON
John Sykes	SSE Energy Supply Limited (Proposer)
Abid Sheikh	Scottish Power
Terry Ballard	NPower
Mark Manley	British Gas Trading
Claire Maxim	Powergen
Liz Anderson	London Electricity
Steve Phillips	British Energy
Sanjukta Round	Cornwall Consulting
Clare Talbot	NGC
Mark Thomas	Npower
Paul Robinson	NGC

<b>Other Attendees</b>	<b>Organisation</b>
Jerome Williams	Ofgem
Heather Galvin	Imserv
Sandra Wybrow	ELEXON – legal department
David Ahmad	ELEXON - legal department
Brian Nichol	Northern Electric
Katie-Ann Key	ELEXON
Pat Mc Lafferty	St. Clements Services
Man Kwong Lieu	Scottish Power
Richard Clarke	ELEXON



## **4 DESCRIPTION AND ASSESSMENT AGAINST THE APPLICABLE BSC OBJECTIVES**

### **4.1 The Proposed Modification**

The Modification Proposal suggested that:

- The cut-off point for raising a Trading Dispute should be [20] months after the Settlement Day.
- The cut-off point for a Post-Final Settlement Run should be [28] months after the Settlement Day.
- The cut-off point for an Extra-Settlement Determination should be [28] months after the Settlement Day.
- The data retention obligations should be defined in order to support the resolution of errors and to ensure that the Settlement timetable and the Settlement related taxation (including VAT) requirements are not compromised.

The precise cut-off points were included within square brackets, in recognition of the fact that they were open to discussion and debate by the appointed Modification Group. The Modification Proposal stated that the cut-off points suggested “strike an appropriate balance between preserving the right of Parties to dispute errors in Settlement, and avoiding burdening the industry with wholly disproportionate data retention costs”. In addition, the Modification Proposal noted that these cut-off points were consistent with a number of existing Code Subsidiary Documents.

The Modification Proposal stated that the existing protracted timetable for raising and resolving Trading Disputes within the Code (whereby a Trading Disputes can be raised up to 36 months after the relevant Settlement Day) imposes very significant data retention costs on Parties, Party Agents and BSC Agents and that this brings little or no benefit in return. The Modification Proposal indicated that there is no reason why Parties should need to raise Trading Disputes more than six months after Final Settlement Run, and there is no reason why the TDC should require more than eight months to resolve them.

The justification given for raising P107 is to bring the Code closer to existing industry practice by reflecting the low number of Trading Queries or Trading Disputes that are raised by Parties after the Final Settlement Run.

#### **4.1.1 Governance Standing Modification Group - Meeting 1**

The first GSMG meeting was held on 22 November 2002. The GSMG were advised of the timescale prescribed for the assessment of P107.

The Proposer outlined the background to P107 including defining its objectives, these being that:

- The cut-off point for raising a Trading Dispute should be set at 20 months after the Settlement Day.
- The cut-off point for a Post-Final Settlement Run and Extra-Settlement Determination should be set at 28 months after the Settlement Day.
- The data retention obligations should be defined within the Code to align with the industry working practices in this area.

The GSMG noted the Proposers' suggested requirements, reviewed the Terms of Reference (Annex 8) and the Initial Written Assessment of P107 (Reference 2). The GSMG also agreed a timetable, the next step being the preparation and issuing of the consultation paperwork to Parties.

The GSMG reviewed the issues raised in the Initial Written Assessment (Reference 2). The GSMG noted that any requirement to shorten the timescale for raising Trading Queries would encourage Parties to monitor their Settlement reports more promptly and carefully and that this was desirable from a trading arrangement perspective.

The GSMG noted that in practice, Trading Queries were generally raised prior to the Final Settlement Run (ie. 14 months after the Settlement Day). It was also noted that only a minority of Trading Queries are raised between 14 and 20 months after the Settlement Day to which they relate (as catered for by BSCP11 'Volume Allocation and Settlement Run Queries') (Reference 12). The GSMG believed therefore that shortening the timescale for raising Trading Queries from 36 months to 20 months would be acceptable and would be consistent with industry working practice.

The GSMG suggested that there should be a cut-off timescale for the resolution of Trading Disputes in order to enable the industry to identify the impact on data retention and clarify their obligation to support Trading Disputes. The GSMG believed that this cut-off would be desirable, as it would introduce certainty into the resolution of Trading Disputes. However the GSMG noted the legal advice given which suggested that it was not possible or desirable to force time-scales on the decision-making process of a governing body such as the TDC and / or the Panel.

The potential impact of P107 on the Past Notification Error (P6) claims and the large AA / EAC was highlighted. The GSMG agreed that any changes made under P107 should not prejudice these correction mechanisms.

ELEXON confirmed that for those industry members that were compliant with the 28 month data retention obligation as contained in the relevant Code Subsidiary Document, the 28 month cut-off point for NETA Go-Live would be reached in July 2003. It was therefore noted that Parties would need to re-negotiate contracts to avoid breaching the existing provisions of the Code (which implied that a minimum of 36 months of data is required (W1.2.5 of the Code)).

Modification Proposal P63 'Change of Contract Management of MPANs for Data Collector, Data Aggregator and Meter Operators' (P63) (Reference 11) was discussed. The GSMG noted that should P63 be approved, this would require Parties to retain up to 48 months of relevant data. The GSMG believed that the requirement to retain 48 months of data within the live operational environment would prove too onerous. The GSMG did however note that the rationale behind the P63 recommendation was to ensure consistency with the current Trading Query / Trading Dispute obligations and that if both P63 and P107 were approved that the P107 data retention obligations would supersede the P63 data retention obligations.

The GSMG agreed that the timescale for data retention should, if possible, be developed from the agreements reached on the Trading Disputes process timescales and that a single set of data retention obligations should be introduced to ensure a market wide implementation of P107. However it was agreed that, under P107, it was only necessary to specify data retention requirements for those BSC Agents that support the Trading Disputes process.

BMRA data is not normally used in the resolution of Trading Disputes. Therefore it was agreed that no additional obligations should be placed on the BMRA. However it was noted that resolution of Past Notification Error (P6) issues may require retention of BMRA data and that P107 should not prejudice this.

The initial conclusions of the GSMG, subject to the consultation responses were:

1. The cut-off timescale for raising Trading Queries should be shortened from 36 to 20 months after the Settlement Day.
2. Parties and Party Agents would be required to retain 28 months of data in the live operational environment. Thereafter there would be a requirement to retain this data in an appropriate manner (ie. live operational environment or an archiving mechanism) for a further 20 months in a format that could be used in the resolution of Trading Disputes.
3. It was not possible to set a cut-off timescale on the resolution of Post-Final Trading Disputes.
4. BSC Agents, specifically the Central Data Collection Agent (CDCA), Supplier Volume Allocation Agent (SVAA), Energy Contract Volume Aggregation Agent (ECVAA), Funds Administration Agent (FAA), Settlement Administration Agent (SAA) and the Central Registration Agent (CRA) would be obliged to retain 28 months of data after the Settlement Day in the live operational environment. Thereafter there would be a requirement to retain the data for a further 20 months in a format that could be used in the resolution of Trading Disputes. No additional obligations should be imposed on the remaining BSC Agents under P107.
5. The requirement for the BMRA to retain data for 12 months would be unchanged (Section V2.2.4 of the Code).
6. BSCCo would advise the industry where a Trading Dispute was unlikely to be resolved by 28 months after the Settlement Day.
7. Any data retention requirements placed upon market participants would not replace any statutory obligations. For example financial information would still need to be retained for seven years for tax purposes.
8. P107 should not prejudice the Past Notification Error (P6) claims and the large EAC / AA issue.
9. P107 should be implemented on a Settlement Day rather than calendar day basis.

#### **4.1.2 Assessment by Software Technical Advisory Group**

On 28 November 2002, the Software Technical Advisory Group (STAG) was presented with P107 for consideration. The notes from the meeting (Reference 6) highlight that the STAG was "concerned that the modification group do not believe it is necessary to specify the data to be retained and highlighted the need for data retained to be clearly specified to aid them in meeting their obligations under the Code". ELEXON agreed that the concerns of the STAG would be presented to the next GSMG meeting on 14 January 2003 and that the STAG would continue to be updated with the progress of P107 through the Assessment Procedure.

#### **4.1.3 Consultation Request**

Following the first meeting of the GSMG, version 1.0 of the Requirements Specification (Reference 4) was prepared by ELEXON and issued to the GSMG for review. Following incorporation of comments, version 1.0 of the Requirements Specification (Reference 4) was issued to Parties on 13 December 2002 for consultation together with a consultation request (Reference 5), with responses due by 10 January 2003.

#### 4.1.4 Other Requests

In addition to the consultation request, Gemserv were requested to issue the consultation paperwork to MRA Contract Managers for consideration and comment in the same timescales. ELEXON also distributed the consultation paperwork to the STAG and also the Supplier Agent Forum (SAF) for consideration and comment.

#### 4.1.5 Governance Standing Modification Group - Meeting 2

The GSMG reviewed the 12 responses to the initial consultation request (Reference 5) at their second meeting on 14 January 2003. The responses are summarised in Section 11 and are included in Annex 2.

In response to the 12 questions that had been raised, the following was noted:

##### **Question 1 - Do you agree that P107 better facilitates the relevant BSC Objectives (c) and (d)?**

Of the responses received on this question, 3 responses (one of which was caveated) stated that P107 would better facilitate BSC Objectives (c) and (d), 4 responses (one of which was caveated) stated that only BSC Objective (d) would be better facilitated by P107, 1 provided a no comment response, 3 rejected P107 in its current form. 1 general comment was received on the entire scope of P107, relating to data retention only.

The GSMG reviewed the rationale provided in the responses and noted:

- Of those that rejected P107, the basis for this was that P107, as proposed in the consultation, was more onerous than those suggested in the Modification Proposal as originally submitted. The GSMG noted that had the consultation been undertaken in respect of the requirements as worded in the original Modification Proposal, it was unlikely that three respondents would have rejected P107.
- Of those that were in support of P107, the responses provided indicated that implementing P107 would encourage Parties to check their Settlement output more promptly which would therefore introduce efficiency into the trading arrangements. P107 would then align the Code with industry working practices.

The GSMG concluded that it was not possible to determine at this stage whether or not P107 better facilitated the relevant BSC Objective(s) until the precise timescales for administering Trading Queries / Trading Disputes had been agreed.

##### **Question 2 - 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)?**

The majority of respondents (8) agreed that the cut-off point for raising Trading Queries / Trading Disputes should be set at 20 months after the Settlement Day, 1 response rejected P107 in its current form, 1 provided a no comment response and 1 general comment was received, relating to data retention only.

The GSMG reviewed the rationale provided and noted:

- That setting the cut-off point at 20 months after the Settlement Day gave Parties sufficient time to review their final Settlement output (which is provided at 14 months after the Settlement Day)

and then subsequently raise any Trading Query. Setting such a timescale would also align the Code with the industry practice and the process outlined in BSCP11 (Reference 12).

- Setting such a cut-off should not prevent 'special cases' arising where Trading Queries could be raised after the cut-off period.

The GSMG concluded that it was desirable to reduce the cut-off period from the current 36 months to 20 months. It was the view of the GSMG that six months after the Final Settlement Run was more than sufficient for a Party to review their Settlement output and raise a Trading Query. This 20 month cut-off is consistent with industry practice (as documented in BSCP11) (Reference 12).

**Question 3 - 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?**

The majority of respondents (5) agreed that it was not possible to define a cut-off timescale for resolving Trading Queries / Trading Disputes post the Final Settlement Run, 4 responses believed that it would be possible to introduce such a cut-off, 1 response rejected P107 in its current form, 1 provided a no comment response. Another general comment was received, relating to data retention only.

The GSMG reviewed the rationale provided in the responses and noted that although it may not be possible to introduce a cut-off for resolving Trading Disputes it may be possible to introduce a deadline for submitting data relating to a particular Trading Dispute.

The GSMG concluded that it was not desirable to define a cut-off timescale for resolving Trading Disputes post the Final Settlement Run. However it should be possible to reduce the cut-off on performing Settlement Runs and remove the power of the Panel to authorise Settlement Runs beyond this cut-off.

Currently the Code (Section U2.2.4) states that:

*"No Settlement Run or Volume Allocation Run shall be carried out on any date which is more than 36 months after the Settlement Day to which such runs relate, save only that (on the recommendation of the Trading Disputes Committee and with the approval of the Panel in accordance with Section W) a Post-Final Settlement Run and Post-Final Volume Allocation Runs may be carried out after that date, upon resolution after that date of a Trading Dispute which was raised not later than 36 months after the Settlement Day in question."*

The GSMG agreed that this cut-off should be shortened from 36 to 28 months, such that no Settlement Run or Volume Allocation Run shall be carried out on any date which is more than 28 months after the Settlement Day to which such runs relate. It was also agreed that the power of the Panel to authorise Settlement or Volume Allocation Runs beyond the 28 month cut-off should be removed. The GSMG recognised that there would be a potential risk associated with the removal of the Panel's power in this area. However the GSMG believed that this risk would be outweighed by the certainty introduced into the Trading Disputes process. Removing the power of the Panel to authorise Settlement Runs indefinitely would allow Parties and Party Agents to design efficient systems and processes around a definite timescale rather than supporting Settlement Runs indefinitely and bearing the associated costs. The GSMG's view was that the Extra-Settlement Determination process provided a sufficiently robust method for resolving the minority of Trading Disputes that exceed the 28 month cut-off for utilising Post Final Settlement Runs.

Therefore the GSMG concluded that where the TDC is unable to resolve the Trading Dispute within 28 months of the Settlement Day to which it relates, the Extra-Settlement Determination process will be

used to correct the Trading Dispute. It should be noted that this would not affect the current ability of the TDC to perform an Extra-Settlement Determination to resolve a Trading Dispute within 28 months of the Settlement Day to which it relates. In recognition of the perceived risk involved with the removal of the Panel's power to authorise Settlement Runs beyond the normal cut-off, the GSMG agreed that the industry view should be obtained via a further consultation.

**Question 4 - 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)**

The majority of respondents (8) agreed 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, 1 response rejected P107 in its current form, 1 provided a no comment response. Another general comment was received, relating to data retention only.

The GSMG reviewed the rationale provided in the responses and noted that beyond 28 months, it would be possible for all Trading Disputes to be resolved via an Extra-Settlement Determination. Thereby it would not be necessary to introduce special processes for Trading Disputes that are not resolved within 28 months of the Settlement Day to which they relate.

The GSMG concluded that it should be normal practice that, beyond 28 months, all Trading Disputes would be resolved via an Extra-Settlement Determination. The minimum data retention timescale proposed under P107 would support Extra-Settlement Determinations for up to 40 months. Therefore it would only be necessary to inform industry of those Trading Disputes which would not be resolved within 40 months of the Settlement Day to which they relate. Therefore the GSMG agreed that the industry should be notified of any Trading Dispute which was unlikely to be resolved within 40 months of the Settlement Day to which it relates.

**Question 5 - 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?**

The majority of respondents (6) agreed 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 could be used in the resolution of Trading Disputes, 4 responses disagreed, 1 response rejected P107 in its current form, 1 provided a no comment response. Another general comment was received, relating to data retention only.

The GSMG reviewed the rationale provided by respondents and noted that there was concern that the requirement to retain data for 20 months (either archived or within the live operational environment) beyond the 28 months was too onerous and that this additional 20 month requirement could not be justified.

The GSMG discussed the potential timescale that would apply for any Trading Query submitted close to the 20 month cut-off period and the timescales for progressing this through to resolution and subsequent appeal and arbitration. Annex 9 provides the timeline for progression of such a Trading Query / Trading Dispute. The key steps and associated timescales are summarised below:

- Trading Query converted into a Trading Dispute at 20 months after the Settlement Day. There is a dependency on the Party for this activity to occur within a short timescale;
- The TDC assesses and determines upon the Trading Dispute by 28 months after the Settlement Day;

- A Party who is dissatisfied with the TDC determination could appeal the TDC decision to the Panel by 29 months after the Settlement Day;
- The Panel would consider any appeal and notify the appellant of their decision by 32 months after the Settlement Day;
- The Party if dissatisfied with the Panel decision could refer the Trading Dispute to arbitration by 33 months after the Settlement Day; and
- After 33 months and if the arbitration was upheld, the industry would need to be advised that the Extra-Settlement Determination route would be used to correct the Trading Dispute and the associated timescales by when this was likely to be performed, which in normal circumstances would occur prior to 40 months after the Settlement Day. However should the Trading Dispute not be resolved by 40 months after the Settlement Day then the industry would be notified accordingly.

In view of the above typical timetable that could potentially arise, the GSMG concluded that retention of data for only 28 months after the Settlement Day would not be sufficient to support the complete Trading Disputes process. The GSMG also concluded that it was appropriate to set a data retention period cut-off at 40 months as this would address the majority of Trading Dispute resolutions.

The GSMG agreed that the first 28 months of data should be held in the live operational environment and the remaining 12 months could be maintained in the live operational environment or alternatively in an archive form if desired. The GSMG concluded that it was a matter for the Parties and Party Agents to decide on the appropriate mechanism and that BSCCo would instigate appropriate data retention mechanisms with the relevant BSC Agents.

**Question 6 - If you do not agree with the timescales proposed in Q5, please specify the appropriate timescale for the live operational environment and the archive data retention period?**

The GSMG reviewed the proposed timescales provided by respondents and considered these when refining the P107 requirements.

**Question 7 - What is your organisation's current data retention practice (Please specify both time-scale and method)?**

The GSMG reviewed the responses provided and noted:

- The majority of respondents' current data retention practices would meet the requirements specified under P107.
- Impact assessment responses would highlight the extent of changes to Party and Party Agents required in support of the data retention requirements proposed under P107.

**Question 8 - 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?**

The majority of respondents (5) agreed that the relevant BSC Agents should be obliged to retain 28 months of data in the live operational environment and a further 20 months in a format that could be used in the resolution of Trading Disputes, 2 responses disagreed (preferring 28 months as included in the P107 Proposal), 1 response rejected P107 in its current form, 3 provided a no comment response. Another general comment was received, relating to data retention only.

The GSMG reviewed the responses provided and noted:

- The requirements on the relevant BSC Agents should be consistent with the timetable for resolving Trading Disputes proposed under P107.
- That it was not necessary to define any additional data retention on any other BSC Agent on the basis that BSCCo held this data.
- The existing provisions within the Code on BMRA data retention obligations would be unchanged by P107.

The GSMG agreed that the Code should specify minimum data retention requirements on relevant BSC Agents to support the Trading Disputes process proposed under P107. However it was noted that in practice BSCCo's contractual arrangements with BSC Agents might exceed these minimum requirements. For example if longer data retention timescales were required for purposes outside the Trading Disputes process. Therefore GSMG agreed that there would be no requirement to change actual contractual arrangements with BSC Agents, unless current data retention practices were less stringent than those proposed under P107.

**Question 9 - Do you agree that the type of data to be retained should be prescribed for each market participant role type or defined in broad terms ie. 'relevant Settlement data'?**

8 of the respondents stated that they believed that the type of data to be retained should be specified in broad terms and 1 respondent disagreed with this. 7 respondents stated that the type of data to be retained should be dependent on the role of market participant whereas 3 disagreed with this.

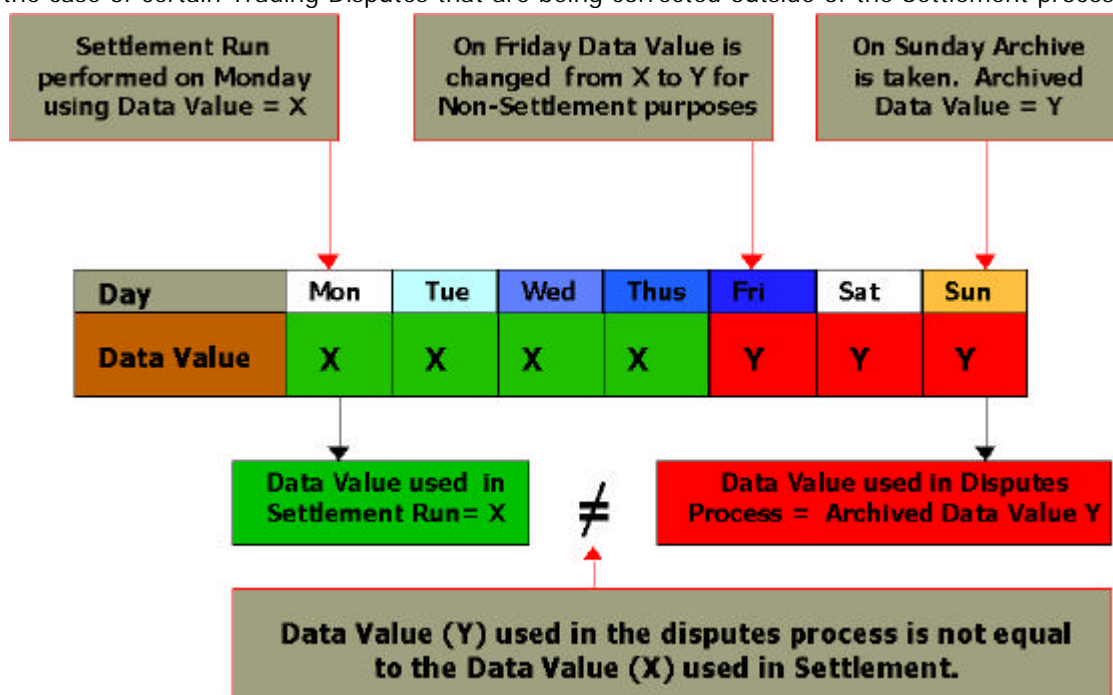
The GSMG reviewed the responses provided and noted that defining the type of data to be retained in broad terms was much more desirable than prescription.

The GSMG agreed that the Code should specify in broad terms the type of data to be retained and that it was for market participants to comply with this.

**Question 10 - Do you agree that where an archiving mechanism is used that the frequency of archiving should be defined? (e.g. daily, monthly etc.)**

The majority of responses indicated that the frequency of archiving should not be specified. However the GSMG noted that not specifying a minimum frequency of archiving presents an issue relating to the accuracy of data entering the Trading Disputes process. The GSMG discussed this issue further as follows.

In the case of certain Trading Disputes that are being corrected outside of the Settlement process (ie.





via Extra-Settlement Determinations) in an ideal situation data settled at the latest Settlement Run would be used as a baseline against which to calculate monetary correction. However, unless data is copied to archive directly after the latest Settlement Run (either the Final Settlement Run or the Disputes Final Run), there is potential for the data to change prior to an archive copy being taken. This situation is most likely to occur with Metered Data, which can be constantly updated for reasons outside of Settlement thereby consequently affecting Settlement data. An example scenario, based on a weekly archiving process, is given in Fig 1.

Fig:1 Archiving Frequency Issue Overview

It would be possible to avoid the situation occurring if an archive copy of data is taken directly after each Settlement Run. However the GSMG concluded that the cost of employing such an extensive archiving process cannot be justified considering the relatively minor improvement in the accuracy of data entering the Trading Disputes process and taking into account the small number of Trading Disputes that would utilise the archived data. It was the view of the GSMG that it would be more practical for archiving to take place on either a daily, weekly or monthly basis. However the optimum archiving frequency is dependent on the type of data involved. Where the data is not changing outside of Settlement the frequency of archiving is not an issue and archiving need only occur infrequently. However, where data is regularly updated outside of Settlement, the costs of a daily or weekly archiving process may be outweighed by the improvement in the quality of data entering the Trading Disputes process. It was recognised by the GSMG that the optimum frequency of archiving is dependent on the Party or Party Agent involved and the initial view of the GSMG was that the method and frequency of archiving should be left under the control of Parties and Party Agents. However it was agreed that an industry view, as to whether the potential detrimental effect on the accuracy of data entering the Trading Disputes process was outweighed by the increased costs associated with specifying a minimum archive frequency, should be obtained via a further consultation.

**Question 11 - Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?**

The majority of respondents (9) felt that if approved, P107 should be implemented on a Settlement Day basis, 1 response rejected P107 in its current form, 1 provided a no comment response and Another comment was received relating to data retention only.

The GSMG reviewed the responses provided and noted:

- Depending on the method of implementation there was the potential to loose data from NETA Go-Live.
- On implementation Parties would loose the right to raise Trading Queries between 20 and 36 months old.

The GSMG concluded that the TDC / Panel should use it's ability to accept late Trading Queries under exceptional circumstances relating to Settlement Days between 20 and 36 months prior to implementation, for 3 months after implementation. This three-month timescale was chosen, as it was consistent with that used at NETA Go-Live.

**Question 12 - Do you have any other comments or issues?**

No significant issues, not covered previously were raised.

Following discussion of the consultation responses, the GSMG agreed the refined requirements for P107 as follows:

1. Cut-off timescale for raising Trading Queries should be shortened from 36 to 20 months after the Settlement Day.
2. Cut-off for all Settlement Runs to be reduced from 36 to 28 months. Beyond 28 months Trading Disputes to be resolved via Extra-Settlement Determinations.
3. The Panel's ability to authorise Settlement Runs beyond the 28 month cut-off should be removed, such that beyond 28 months all Trading Disputes would be resolved via Extra-Settlement Determinations.
4. Parties and Party Agents will be required to retain 28 months of data such that they are capable of supporting a Settlement Run up to 28 months after the Settlement Day to which it relate ie. it would be necessary to maintain data for 28 months in the live operational environment.
5. Thereafter there will be a requirement to retain this data in an appropriate manner (ie. live operational environment or an archiving mechanism) for a further 12 months in a format that can be used in the resolution of Trading Disputes via an Extra-Settlement Determination. Where archiving is to be employed all data maintained for the previous 28 months would be required.
6. BSC Agents – CDCA, SVAA, ECVAA, FAA, SAA and the CRA will be obliged to support Settlement Runs for at least 28 months after the Settlement Day to which it relates. Thereafter there will be a requirement to store the data for at least a further 12 months in a format that can be used in the resolution of Trading Disputes via Extra-Settlement Determinations.
7. The requirement for the BMRA to retain data for 12 months will be unchanged (Section V2.2.4 of the Code). It should be noted that BMRA data might be required in the resolution of Past Notification Error (P6) claims.
8. BSCCo will advise the industry where a Trading Dispute is unlikely to be resolved within 40 months of the Settlement Day to which it relates. This should enable industry members to determine whether additional data retention may be required to support the resolution of a Trading Dispute.
9. Resolution of Past Notification Errors (P6) will not be prejudiced by P107.
10. Resolution of the EAC / AA issue will not be prejudiced by P107.
11. Any requirements placed on market participants will not replace any statutory obligations. For example financial information may still need to be retained for seven years for tax purposes.
12. P107 to be implemented on a Settlement Day rather than calendar day basis.
13. On implementation Parties will be given a three month period to raise any Trading Queries / Trading Disputes that relate to Settlement Days between 20 and 36 months old. Thereafter this moratorium will end.

It was agreed that these refined requirements should be issued for joint consultation and DLIA and that these requirements did not constitute an Alternative Modification.

#### **4.1.6 Assessment by the Supplier Agent Forum**

On 15 January 2003 the SAF were presented with the GSMG's updated requirements following the GSMG meeting on 14 January 2003. The SAF were requested to formally raise any issues via the second consultation / DLIA.

#### **4.1.7 Assessment by Software Technical Advisory Group**

On 16 January 2003 the STAG were presented with the GSMG's updated requirements following the GSMG meeting on 14 January 2003. The STAG were requested to formally raise any issues via the second consultation / DLIA.

#### **4.1.8 Consultation & Detailed Level Impact Assessment Request**

Following the second meeting of the GSMG on 14 January 2003, version 2.0 of the Requirements Specification (Reference 9), the second consultation and DLIA request was prepared by ELEXON and issued to the GSMG for review. The GSMG agreed that a second consultation should be conducted in light of refinements to the requirements and recognised the short timescale that may involved in completing the consultation and DLIA.

Following incorporation of comments, the second consultation request (Reference 7) was issued to Parties on 28 January 2003. In addition, the DLIA request was issued to Parties, Party Agents and Supplier Meter Registration Service Agents (SMRAs) on 28 January 2003 via MC00037 (Reference 8), with responses due on 3 February 2003.

In addition to the consultation request, Gemserv were requested to issue the consultation paperwork to MRA Contract Managers for consideration and comment in the same timescales. ELEXON also distributed the consultation paperwork to the STAG and also the SAF for consideration and comment.

In addition, DLIA requests were issued to the relevant BSC Agents with responses due on 5 February 2003.

#### **4.1.9 Second Consultation Responses**

The responses to the second consultation are summarised in Section 11 and are included in Annex 3.

#### **4.1.10 Detailed Level Impact Assessment Request Responses**

The responses to the DLIA request are summarised in Section 11 and are included in Annex 4.

#### **4.1.11 Governance Standing Modification Group - Meeting 3**

The GSMG reviewed the responses to the parallel consultation and DLIA request at their third meeting, on 4 February 2003.

##### **Consultation Responses**

The GSMG noted that 7 responses had been received to the consultation. In response to the 10 questions that had been raised, the following was noted:

##### **Question 1 - Do you consider that the refined solution for P107 better facilitates the Applicable BSC Objectives (c) / (d)?**

The GSMG noted that 2 respondents rejected P107 in its entirety but that in relation to specific BSC Objectives, the following responses had been received:

BSC Objective (c) – 1 respondent believed that P107 better facilitated this BSC Objective, 5 respondents did not believe that P107 better facilitated this BSC Objective and the remaining 2 respondents did not provide any comment on this BSC Objective.

BSC Objective (d) - 5 respondents believed that P107 better facilitated this BSC Objective and 2 respondents did not believe that P107 better facilitated this BSC Objective.

The GSMG reviewed the responses provided and noted the majority of the respondents were in favour of the Proposed Modification and that without significantly modifying the P107 requirements there would not be unanimous support for the implementation of P107. The GSMG debated at length the Proposed Modification and concluded that the refined P107 requirements did in fact better facilitate the relevant BSC Objective on the basis that the Code and the BSC community would be clearer on its obligations and had an approach which addressed the majority of Trading Dispute issues.

**Question 2 - 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)?**

The GSMG noted that there was unanimous support from respondents that no Post-Final Settlement Run should occur beyond 28 months after the Settlement Day. The GSMG therefore concluded that this was an appropriate timescale.

**Question 3 - 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)?**

The GSMG noted that the majority (6) of the respondents stated that it was appropriate that 28 months of data should be retained in the live operational environment. The GSMG reaffirmed their view that this was an appropriate cut-off timescale based on the responses received and having taken into consideration their conclusions at the previous GSMG meeting (refer to Question 5 of section 4.1.5).

**Question 4 - 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)?**

The GSMG noted that the majority (6) of the respondents had stated that a further 12 months of data should be retained. The GSMG concluded that this was an appropriate cut-off timescale based on the responses received and having taken into consideration their conclusions at the previous GSMG meeting (refer to Question 5 of section 4.1.5).

**Question 5 – 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?**

The GSMG noted that there was a mixed response as to whether the remaining 12 months of data should be kept either as a complete copy of the live operational environment or a sub-set of the live operational environment. 4 respondents had stated that they prefer that a complete set of data was retained, 1 respondent had stated that this data should be a sub-set of the live operational data and 2 respondents stated that it was a matter for the participant to decide upon the appropriate process as long as the requirement was specified generically within the Code. The GSMG concluded that it was not appropriate that the Code specify a data archiving policy. Rather it was for the Code to specify the data retention timescales and for each market participant to determine how best to meet this obligation.

**Question 6 - 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?**

The GSMG noted that 2 respondents had indicated the type of data that had been provided for a Trading Dispute that they had been involved in. The GSMG concluded that it was not possible to establish a definitive set of data retention requirements within the Code on the basis that there could always be an exception.

**Question 7 - 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)**

The GSMG noted that all the respondents believed that it was not necessary to specify a data archiving policy on the basis that the costs of implementing an industry wide archiving policy would outweigh the benefits that would be gained. The GSMG concluded that P107 should not recommend introduction of such a policy on the basis that it was for market participants to determine the best practice and the appropriate frequency of archiving.

**Question 8 - 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?**

In relation to how much data should be transferred between the relevant Party Agents (ie. Data Collectors and Meter Operator Agents), the GSMG noted that there was a mixed response as to the amount of data should be transferred. 3 respondents had preferred that only live operational data was transferred, 2 had preferred that all 40 months of data be transferred, 1 'no comment' was received and the final respondent referred to CP873 (which proposed a timescale of 14 months of data relating to Half Hourly Data Collectors only). Following legal advice, the GSMG concluded that it was appropriate that the P63 data transfer obligations should remain and that these should not be compromised by P107; the key change being the timescale only.

**Question 9 - 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)?**

The GSMG noted that all responses supported the proposed interim process relating to Trading Disputes that were older than 20 months. The GSMG therefore concluded that it was an appropriate process particularly as such a principle had been allowed following implementation of NETA.

The GSMG noted that as P107 would be implemented on a calendar day basis, transitional arrangements would be required to enable Parties to raise all outstanding Trading Queries / Trading Disputes for Settlement Days earlier than 20 months prior to the P107 Implementation Date.

#### **Question 10 – General Comments?**

The GSMG spent considerable time debating the specific comments provided. The GSMG noted that one respondent had rejected P107 in its entirety on the basis that it was not believed that P107 delivered any benefits. Another respondent who also rejected P107 in its entirety had done so because they wanted prescription on the type of data that should be retained after the 28 month cut-off period ie. they did not have an issue relating to the 40 month cut-off period only what data should be retained. The GSMG concluded that these comments did not change their views in respect of the Proposed Modification on the basis that such amendments would not deliver a robust solution for processing Trading Disputes.

#### **Detailed Level Impact Assessment Responses**

The GSMG noted that 12 responses had been received to the DLIA.

In response to the 4 questions that had been raised, the following was noted:

#### **Question 1 - What impact, if any, will the Proposed Modification have on your organisation?**

The GSMG noted that of those who had responded to this question that the impact ranged from minor to additional hardware / tape storage being required. One particular respondent included a cost of £10,000 for additional tape storage. The GSMG concluded that the affect of P107 was therefore minimal based on the responses received to the DLIA.

#### **Question 2 - What implementation timescale, if applicable, would your organisation require to implement the changes associated with the Proposed Modification?**

The GSMG noted that timescales provided ranged from zero through to six months (from three respondents). The GSMG concluded that the appropriate lead timescale for P107 should be based on a reasonable lead timescale for implementation of P107 rather than the maximum suggested by three respondents.

#### **Question 3 - If this Modification Proposal is not applicable to your organisation, please indicate why (e.g. proposed changes do not apply to Party Agents).**

The GSMG noted that no response received to this question had indicated that P107 was not applicable to participant organisations. The GSMG therefore concluded that of those who responded that P107 appeared to be of interest to the BSC community.

#### **Question 4 - Any other comments:**

Of those who provided particular comments, the GSMG noted that one respondent preferred that the frequency of archiving was formalised within the BSC and that another respondent rejected P107 relating to the additional 12 months of data that would need to be retained. The grounds for this rejection being that the respondent preferred that specific data items be retained rather than a

complete set of the live operational environment in archive form. The GSMG concluded that no new arguments had been raised in the DLIA, which had not already being discussed.

### **BSC Agent Impact Assessment Responses**

The BSC Agent impact assessments are contained in Annex 5.

The GSMG noted that BSCCo were in discussions with the SVAA BSC Agent to establish the appropriate mechanism for the remaining 12 months of data and that the Implementation Date should take into account any such development.

The GSMG also noted that the single quotation provided by the CDCA, ECVAA, SAA, and the CRA BSC Agents did not include any costs on the basis that they had not budgeted any costs for documentation updates. The GSMG were advised that BSCCo believed for consistency purposes, that it was necessary to amend a number of Code Subsidiary Documents and therefore that further discussions would need to be had with the CDCA, ECVAA, SAA and CRA to agree such changes.

Section 5 outlines the proposed changes to the BSC Agent related documentation that are proposed by P107.

The GSMG noted that an update on the BSC Agent quotations would be provided to the Panel on 13 February 2003.

### **GSMG Conclusions**

Following analysis of the consultation and DLIA responses, the GSMG agreed that the Proposed Modification P107 would consist of the following:

- The cut-off point for raising a Trading Query should be 20 months after the Settlement Day.
- The cut-off point for a Post-Final Settlement Run should be 28 months after the Settlement Day.
- The existing ability of the Panel to authorise Settlement Runs beyond the normal cut-off (28 months under P107), as detailed in Section U2.2.4 of the Code, should be removed effective for all Settlement Runs carried out following implementation of P107 (ie. a calendar day implementation).
- No cut-off point will be specified for undertaking an Extra-Settlement Determination. However under normal circumstances these will be undertaken by 40 months after the Settlement Day.
- Parties, Party Agents and the relevant BSC Agents will be required to retain a minimum of 40 months of Settlement data (with 28 months being retained in the live operational environment and the further 12 months being retained either in the live operational environment or using an appropriate archiving mechanism).
- The above requirements should not compromise the Past Notification Error (P6) or the large AA / EAC issue.

The GSMG concluded that the above requirements did not constitute an Alternative Modification although a respondent to the consultation / DLIA had suggested this on the basis that the Modification Proposal as submitted had included all timescales in brackets and had also stated that it was for the relevant Modification Group to determine these timescales.

The GSMG reviewed the draft legal text which had been provided and requested a number of minor amendments to remove any potential opportunity for ambiguity. The GSMG concluded that the legal text, subject to minor changes, adequately supported the P107 requirements. The GSMG however did request that during the Report Phase, that industry members be requested to comment specifically on the timescale that had been included in the legal text relating to the notification period that industry members would have to provide relevant data for use in an Extra-Settlement Determination (Section U1.6.3 (b) of the Code). Following review of the legal text the GSMG concluded that it was appropriate that P107 should be implemented on a calendar basis.

The GSMG concluded that all the Terms of Reference included in Annex 8 had been addressed via the Proposed Modification P107.

The GSMG concluded that the refined P107 requirement better facilitated BSC Objective (d) and that the refined requirements did not constitute an Alternative Modification. The rationale for this is that P107 reflects the industry working practices and also additionally provides a more robust Trading Dispute resolution process that uses the Settlement systems to correct Trading Dispute errors up to a reasonable cut-off period; thereafter the Extra-Settlement Determination process would be utilised thereby minimising potential impact on the whole of the industry. The GSMG concluded that P107 did not better facilitate achievement of BSC Objective (c) on the basis that P107 would not promote effective competition.

## 4.2 Alternative Modification

No Alternative Modification has been developed.

## 5 IMPACT ON THE CODE AND BSCCO DOCUMENTATION

### 5.1 Code

Amendments will be required to the following Sections of the Code:

Section F 'Modification Procedures'

Section S 'Supplier Volume Allocation'

Section U 'Provisions Relating To Settlement'

Section W 'Trading Queries And Trading Disputes'

Annex X-1 'General Glossary'

The proposed legal text is attached in Annex 1.

### 5.2 Code Subsidiary Documents

Amendments will be required to the following Code Subsidiary Documents:

Code Subsidiary Document	Proposed Amendment
BSCP01 'Overview of Trading Arrangements'	<ol style="list-style-type: none"> <li>Section 1 to specify that Post-Final Settlement Runs and Extra-Settlement Determinations exist.</li> <li>Section 1 to specify that data retention obligations exist.</li> </ol>



Code Subsidiary Document	Proposed Amendment
BSCP11 'Volume Allocation and Settlement Run Queries	<ol style="list-style-type: none"> <li>1. Amend the timescale by when a Trading Query and / or Trading Dispute can be raised (these are two distinct entities) up to 20 months after the Settlement Day.</li> <li>2. Clarify that Trading Queries / Trading Disputes will only be considered if all Settlement Days within the claim are within the 20 month period.</li> <li>3. Amend the timescale by when a Post-Final Settlement Run will be completed, which is up to 28 months after the Settlement Day.</li> <li>4. Identify that Extra-Settlement Determinations will be completed, either within the existing Settlement Run timetable, prior to the Post-Final Settlement Run and / or after the Post-Final Settlement Run.</li> <li>5. Include a cut off date by when the Panel will determine when the Post-Final Settlement Run will take place.</li> <li>6. Include a cut off date by when a Party must convert a Trading Query into a Trading Dispute if such Trading Dispute is to be considered by the TDC.</li> </ol>
BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'	Clarify the data transfer requirements.
BSCP508 'Supplier Volume Allocation Agent'	<p><u>3.4 'Annual Profile Data'</u>: The timescale currently allows for annual profile data to be requested from SVAA 'At any time'. Following implementation of P107, this data will only be available up to 40 months after the Settlement Day. The timescale references in this process will need modification to restrict a Party's ability to indefinitely request this data.</p>
PSL110 'SVA Meter Operation'	<p>Clarification of:</p> <ol style="list-style-type: none"> <li>1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months.</li> <li>2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.</li> <li>3. if applicable, any existing data transfer requirements.</li> </ol>
PSL120 'Non-Half Hourly Data Collection'	<p>Clarification of:</p> <ol style="list-style-type: none"> <li>1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months.</li> <li>2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.</li> <li>3. if applicable, any existing data transfer requirements.</li> </ol>
PSL130 'Half Hourly Data Collection'	<p>Clarification of:</p> <ol style="list-style-type: none"> <li>1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months.</li> <li>2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.</li> <li>3. if applicable, any existing data transfer requirements.</li> </ol>

Code Subsidiary Document	Proposed Amendment
PSL140 'Non-Half Hourly Data Aggregation'	<p>Clarification of:</p> <ol style="list-style-type: none"> <li>1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months.</li> <li>2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.</li> <li>3. if applicable, any existing data transfer requirements.</li> </ol>
PSL150 'Half Hourly Data Aggregation'	<p>Clarification of:</p> <ol style="list-style-type: none"> <li>1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months.</li> <li>2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.</li> <li>3. if applicable, any existing data transfer requirements.</li> </ol>
PSL160 'Supplier Meter Registration Agent'	<p>Clarification of:</p> <ol style="list-style-type: none"> <li>1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months.</li> <li>2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.</li> <li>3. if applicable, any existing data transfer requirements.</li> </ol>
PSL170 'Meter Administration'	<p>Clarification of:</p> <ol style="list-style-type: none"> <li>1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months.</li> <li>2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.</li> <li>3. if applicable, any existing data transfer requirements.</li> </ol>
PSL180 'CVA Meter Operation'	<p>Clarification of:</p> <ol style="list-style-type: none"> <li>1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months.</li> <li>2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.</li> <li>3. if applicable, any existing data transfer requirements.</li> </ol>
SSL320 'Disaster Recovery Service'	Cross-refer to SSL370 for the data retention obligations
SSL330 'National Support Services'	Cross-refer to SSL370 for the data retention obligations

Code Subsidiary Document	Proposed Amendment
SSL370 'Miscellaneous Services'	Clarification of: <ol style="list-style-type: none"> <li>1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months.</li> <li>2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.</li> </ol>
BMRA Service Description	Embody the current Code obligations (V2.2.4) into the Service Description. Note: P107 does not seek to revise the Code obligations.
CRA Service Description	Inclusion of: <ol style="list-style-type: none"> <li>1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the archive mechanism will be used for a further 12 months.</li> <li>2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.</li> </ol>
FAA Service Description	Inclusion of: <ol style="list-style-type: none"> <li>1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the archive mechanism will be used for a further 12 months.</li> <li>2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.</li> <li>3. ensure that the Past Notification Error (P6) process data retention requirements are not compromised by the P107 data retention requirements</li> </ol>
CDCA Service Description	Inclusion of: <ol style="list-style-type: none"> <li>1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the archive mechanism will be used for a further 12 months.</li> <li>2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.</li> </ol>
ECVAA Service Description	Inclusion of: <ol style="list-style-type: none"> <li>1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the archive mechanism will be used for a further 12 months.</li> <li>2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.</li> <li>3. ensure that the Past Notification Error (P6) process data retention requirements are not compromised by the P107 data retention requirements</li> </ol>
SAA Service Description	Inclusion of: <ol style="list-style-type: none"> <li>1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the archive mechanism will be used for a further 12 months.</li> <li>2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.</li> <li>3. ensure that the Past Notification Error (P6) process data retention requirements are not compromised by the P107 data retention requirements</li> </ol>

### 5.3 Amendments to Other Configurable Items

Amendments may be required to a number of other configurable items, these being:

Configurable Item	Proposed Amendment
BMRA User Requirement Specification	Consistency changes with Service Description changes
CRA User Requirement Specification	Consistency changes with Service Description changes
CDCA User Requirement Specification	Consistency changes with Service Description changes
ECVAA User Requirement Specification	Consistency changes with Service Description changes
SAA User Requirement Specification	Consistency changes with Service Description changes
FAA User Requirement Specification	Consistency changes with Service Description changes
NHHDA User Requirement Specification	Consistency changes with Service Line changes
EAC/AA User Requirement Specification	Consistency changes with Service Line changes
SVAA User Requirement Specification	Consistency changes with Service Line changes

### 5.4 BSCCo Memorandum and Articles of Association

No changes are required to the BSCCo Memorandum and Articles of Association.

## 6 IMPACT ON BSC SYSTEMS

The relevant BSC Agent DLIA's are included in Annex 5. The comments of the GSMG in respect thereof are included in Section 4.

## 7 IMPACT ON CORE INDUSTRY DOCUMENTS AND SUPPORTING ARRANGEMENTS

### 7.1 Grid Code

The Transmission Licence requires 6 years of data to be retained, which is beyond the P107 requirements. There is no intention to modify the Transmission Licence on the basis that it is acceptable for different additional data retention obligations to apply.

### 7.2 Master Registration Agreement

The MRA has two paragraphs which are affected by P107, these being:

- 30.1 which states that "Each Service Provider shall ensure that it securely maintains a historical record of all data items that have been held in respect of a Metering Point on its MPAS Registration System and that such records are fully auditable, so that a full historical record is maintained for a period of no less than 28 months following initial settlement date in relation to any particular data item, the most recent 24 months being held on-line." This paragraph would need changing to ensure consistency with the P107 requirements.
- 34.11 which states that "Where a party ceases to be a party pursuant to the terms of Clause 34.8 or Clause 34.10, Clauses 32, 33, 34, 35, 36 and 38 to 46 (inclusive) shall

remain in full force and effect as regards that party.” This paragraph would need changing to include a hook into paragraph 30.1.

## **8 IMPACT ON ELEXON**

BSCCo is already involved in the Trading Disputes process and also retains certain data received from a number of BSC Agents. These responsibilities will continue to apply should P107 be implemented. In particular BSCCo will retain the results of:

- Certification including the Self-Assessment Certification Returns (SACR)<sup>1</sup> and any other documentation that are provided by the Certification Agent;
- Technical Assurance Visits;
- Entry Processes; and
- Teleswitch Agent, BSC Audit and Profile Administrator recommendations.

In addition, BSCCo will continue to support the resolution of the large EAC / AA corrections process and the which will continue for the foreseeable future as well as the Past Notification Error (P6) process.

To support the implementation of P107 BSCCo will be required to:

- Support the Trading Dispute timescales and processes.
- As necessary notify industry on behalf of the TDC of any Trading Disputes unlikely to be resolved within 40 months of the Settlement Day to which they relate.

It is not anticipated that this increases the BSCCo overheads on the basis that P107 is reflecting within the Code and other documentation the precise processes to be followed for administering Post-Final Trading Disputes.

## **9 IMPACT ON PARTIES AND PARTY AGENTS**

### **9.1 Parties**

A Party can use the Settlement process to correct errors that are identified within the Settlement timetable (up to 14 months after the Settlement Day). Following implementation of P61 Ad Hoc Adjustments to Settlement involving material errors without resorting to Ad Hoc Settlement Runs' (Reference 10) within the Code on 10 December 2002, resolution of errors can also be processed additionally using the Extra-Settlement Determination and the Post-Final Settlement Run mechanisms.

If P107 is approved:

- i) each Party would have a three month period after implementation of P107 to raise Trading Query's / Trading Disputes for any Settlement Days between 20 months and 36 months.
- ii) each Party would have six months after the Final Settlement Run to raise a Trading Query with the TDC.

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<sup>1</sup> P99 'Changes to Accreditation and the PARMS Serials and Standards, resulting from the Performance Assurance Framework (PAF) Review (Phase 1)' proposes replacing the SACR with a Certification Check List. P99 was recommended by the Panel for approval on 15 January 2003.

- iii) each Party would need to ensure that when submitting a claim that all Settlement Days within the Trading Query would be less than 20 months old (once the moratorium had ended – refer to i)).
- iv) each Party will be required to retain 40 months of Settlement data (28 months in the live operational environment with a further 12 months in archive form (in a format which is easily retrievable)).
- v) relevant Parties may be required to support Extra-Settlement Determinations beyond the 40 month cut-off period.

Parties may therefore be affected to a greater or lesser degree; this will be confirmed by DLIA.

The conclusions of the GSMG on the responses provided by Parties is included in Section 4.

## **9.2 Party Agents**

If P107 is approved:

- i) each Party Agent will be required to retain 40 months of Settlement data (28 months operational and 12 months in archive form (in a format which is easily retrievable)).
- ii) relevant Party Agents may be required to support Extra-Settlement Determinations beyond the 40 month cut-off period.
- iii) In support of P63 (Reference 11), Supplier Agents (specifically Half Hourly and Non-Half Hourly Meter Operator Agents and Non-Half Hourly Data Collectors) will be required to transfer up to 40 months of Settlement data to the incoming Supplier Agent following de-appointment of the incumbent Supplier Agent.

The conclusions of the GSMG on the responses provided by Party Agents is included in Section 4.

## **10 LEGAL ISSUES**

No legal issues remain.

## 11 SUMMARY OF REPRESENTATIONS

### 11.1 First Consultation Representations

Below is a summary of the representations made by Parties and interested third parties during the first consultation undertaken in respect of P107 (13 December 2002 – 10 January 2003).

The views and comments of the GSMG in respect thereof are contained in Section 4.

A copy of the consultation representations is included in Annex 2.

<b>No</b>	<b>Company</b>	<b>File Number</b>	<b>No. BSC Parties Represented</b>	<b>No. Non-Parties Represented</b>
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





Company	Questions & Responses											
	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12
	BSC Objective	Raising dispute cut-off point @ 20 months	Not possible to define dispute cut-off point	Proposed process agreeable	28 months on-line and 20 months off-line	Other timescale preferences	Current retention practice	BSC Agent obligations as for Parties	Prescription / Non-prescription	Prescribe frequency of archiving	Settlement Day implementation	Other comments
TXU Europe	Yes	Yes	Yes	Yes	Yes	--	Live -28 months Archive - 7 years	Yes	Role - Yes Broad Terms - Yes	Weekly	Yes	--
Aquila Networks	Reject											
Logica CMG	No comment											
British Gas Trading	(d)	Yes	Yes	No	Yes	--	Live - 26 months	Yes	Role - No Broad Terms - Yes	No	Yes	Yes
Scottish & Southern	(c), (d)	Yes	Yes, but	Yes	No, 28 months only	Live - N/A Archive - Nil	Live - 36 months	No (should be as P107)	Role - No Broad Terms - Yes	No	Yes, provided 27 March 2001	Yes
LE Group	(d)	Yes	No	Yes	Yes	--	Live - Settlement & ECVNA/MV RNA details	Yes	Role - No Broad Terms - Yes	Monthly for tape	Yes	--
Siemens	(c), (d)	Yes	No / Yes	Yes	Yes & No	Live - 48 months HH - 17, live & 31 archive, 53, tape - months	Live - Settlement, indefinitely  Ad-hoc - 27 months HH - indefinitely	Yes	Role - No Broad Terms - Yes	No	Yes	Yes

Company	Questions & Responses											
	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12
	BSC Objective	Raising dispute cut-off point @ 20 months	Not possible to define dispute cut-off point	Proposed process agreeable	28 months on-line and 20 months off-line	Other timescale preferences	Current retention practice	BSC Agent obligations as for Parties	Prescription / Non-prescription	Prescribe frequency of archiving	Settlement Day implementation	Other comments
Innogy	(d)	Yes	Yes	Yes	Yes	--	Live – 48 months	Yes	Role – Yes Broad Terms - Yes	No	Yes	--
STAG & Accuread	Data to be retained should be prescribed											
Scottish Power	No	Yes	No	Yes	No	Live – 24 months Archive – 4 months	On-line as / current requirements	No	Role – No Broad Terms - Yes	No	Yes	Yes
NGC	(d)	Yes	Yes	Yes	Yes	--	Live – 8 years Paper – 8 years	No view	Role – Yes	No	Yes	Yes
IMServ Europe	No		No	Yes	No	Live – 24 months Archive – 48 months	Live – 24 months Archive	--	Role – No Broad Terms - Yes	No	Yes	--

## 11.2 Second Consultation Representations

Below is a summary of the representations made by Parties and interested third parties during the second consultation undertaken in respect of P107 (28 January 2003 – 4 February 2003).

The views and comments of the GSMG in respect thereof are contained in Section 4.

A copy of the consultation representations is included in Annex 3.

<b>No</b>	<b>Company</b>	<b>File Number</b>	<b>No. BSC Parties Represented</b>	<b>No. Non-Parties Represented</b>
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	

Company	Questions & Responses									
	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
	BSC Objectives	Settlement Run cut-off point @ 28 months	28 months online	12 months	Archive, Complete copy or subset	What data have you provided for Disputes beyond 14 months	Agree no need to specify Minimum Archive frequency	Transfer online data only?	3 month amnesty on raising Disputes	Other comments
IMServ	No - timescales are too long	Y	Too long	No, the documentation does not justify the benefits of this approach	Left under control of Party/Party Agent	Half Hourly data for metering point	Y	Y	Y	Does this actually address the current issue?
British Gas Trading	c - No d - Yes	Y	Y	Y	Complete	N/A	Y	All 40 months	Y	
Innogy	C - N D - Y	Y	Y	Y	Complete	See response	Y	Original Agent should be required to hold all 40 months	Y	
NGC	d-Y	Y	Y	Y	Complete	N/A	Y	No Comment	Y	
Scottish and Southern	c - Y d - Y	Y	Y	Y	Left under control of Part/Party Agent as long as requirement is specified	No Comment	Y	Only online, other data is impractical.	Y	
Scottish Power	c - N d - N	Y	Y	Y	Sub-set	N/A	Y (although they actually stated N)	No – Refer to CP873	Y	See response

Company	Questions & Responses									
	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
LE Group	c-N d-Y	Y	Y	Y	Complete	N/A	Y	Y	Y- Although provided sufficient notice of implementation is given then you don't need the amnesty anyway	



### 11.3 Detailed Level Impact Assessment Representations

Below is a summary of the representations made by Parties and interested third parties during the DLIA undertaken in respect of P107.

The views and comments of the GSMG in respect thereof are contained in Section 4.

A copy of the DLIA representations is included in Annex 4.

<b>Company</b>	<b>What Impact?</b>	<b>What Implementation Timescale?</b>	<b>Is P107 not applicable to your organisation?</b>	<b>Any Other Comments?</b>
Scottish & Southern	Minor	1 Month		None
United Utilities Electricity Plc				Keep data for more than proposed by P107
Aquila Networks	No Comment	No Comment	No Comment	No Comment
British Energy	No change to system but change to hardware sizing required	3 Months		None
Npower Ltd, Npower Direct Ltd, Npower Yorkshire Ltd, Npower Northern Ltd, Npower Yorkshire Supply Ltd, Npower Northern Supply Ltd	None	N/A	Already store all data and have procedures for archiving	
YEDL/NEDL	No objections	No objections	No objections	No objections
NGC	Limited impact on National Grid	None		
IMServ	Yes will require more data to be retained – 15-20% increase on hardware requirements	6 Months		
Scottish Power	Increase cost burden	At least 6 Months		See response
LE Group	Not significant	None	N/A	
AccuRead	Estimated £10K costs for additional tape storage	6 Months	N/A	Prefer specification of data archiving frequency

<b>Company</b>	<b>What Impact?</b>	<b>What Implementation Timescale?</b>	<b>Is P107 not applicable to your organisation?</b>	<b>Any Other Comments?</b>
United Utilities Electricity (provided via Gemserv contact)	Do not oppose.	Do not oppose.	Do not oppose.	Do not oppose.



## 12 SUMMARY OF TRANSMISSION COMPANY ANALYSIS

The Transmission Company analysis is included in Annex 7.

In summary, the Transmission Company stated that P107 did not directly effect the ability of the Transmission Company to discharge its obligations efficiently. They also stated that they believed that P107 would better facilitate BSC Objective (d) as it provides for the reduction of timescales for the retention of archived data and addresses the associated costs. In addition they confirmed that there was no direct impact on their systems and processes and therefore no specific lead-time was required for them to implement P107.

## 13 PROJECT BRIEF

The detailed costs and timescales in this Assessment Report are based on the costs and timescales received from the BSC Agents, specifically the CDCA, ECVAA, SAA, CRA, SVAA and the FAA.

Should the Authority approve P107 a Project will be required for implementation of the changes required to:

- develop the changes to the BSC related documentation; and
- develop and implement any necessary changes to the SVAA software.

The BSC Agents have provided costs and timescales for the development of the changes for P107. These quotations are currently being assessed by BSCCo on behalf of the GSMG.

### CDCA, ECVAA, SAA and CRA Costs

No costs have been provided by the CDCA, ECVAA, SAA and CRA on the basis that these BSC Agents had not anticipated that changes would be required to documentation. BSCCo believe for consistency purposes, that it is necessary to amend a number of Code Subsidiary Documents and an approximate cost of **£6000.00** has therefore been budgeted for any development / review activity by the CDCA, ECVAA, SAA and CRA.

There would not be any annual operation and maintenance cost.

### SVAA Costs

An initial cost of **£5452** has been provided by the SVAA for their development work with an ongoing monthly operation and maintenance cost of **£298**. However BSCCo has been made aware that further data retention mechanisms will need to be put in place to support P107, therefore this cost may increase and the implementation timescale has taken this into account. BSCCo therefore estimates a budget in the region of £10,000 (this is to be confirmed).

#### FAA Costs

The FAA has provided a cost of **£1845** to implement P107.

There would be no annual operation and maintenance cost.

ELEXON will be responsible for managing implementation of the Proposed Modification and will require an additional 6 weeks development time over any BSC Agent estimated timescale. ELEXON estimate a total of 122 man days to deliver the Project.

### **ANNEX 1 – LEGAL TEXT**

Refer to separate Addendum.

## ANNEX 2 – RESPONSES TO FIRST CONSULTATION

Below are the responses received to the consultation (13 December 2002 – 10 January 2003).

### 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	
		Response	Rationale
Q1	<b>Do you agree that P107 better facilitates the relevant BSC Objectives:</b>	<b>Response</b> <b>Yes</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'?		
	'(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> <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?	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.	-	
Q7	What is your organisation's current data retention practice (Please specify both time-scale and method)?	<b>Details:</b> Live operational environment data retention period = 28 Months Archived Data = 7 Years.	
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	Rationale:

No	Question	Response	
Q9	<b>Do you agree that the type data to be retained should:</b>	<b>Response Yes/No</b>	<b>Rationale:</b>
	1) Prescribed for each market participant role type?	Y	
	2) Defined in broad terms ie. 'relevant Settlement data'?	Y	
Q10	<b>Do you agree that where an archiving mechanism is used that the frequency of archiving should be defined? (e.g. daily, monthly etc.)</b>	<b>Response Yes (Weekly)</b>	<b>Rationale:</b>
Q11	<b>Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?</b>	<b>Response Yes</b>	<b>Rationale:</b>
Q12	<b>Do you have any other comments or issues?</b>	<b>Comments:</b>	

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#### **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

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**P107\_ASS\_003 – Logica CMG**

No comments from SWAE NHHDA/NHHDC

Peter Boak  
> LogicaCMG, Outsourcing Services, Data Services Unit

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**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	<p><b>Do you agree that P107 better facilitates the relevant BSC Objectives:</b></p> <p>'(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'?</p>	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	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 Code by placing obligations on BSC Parties, BSC Agents (Agents) and Party Agents (PA) in relation to the requirements to hold 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>	<b>Response Yes</b>	<b>Rationale:</b> 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&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.

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> Yes</p>	<p><b>Rationale:</b> 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 live operational environment 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.
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</b>	<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</b> <b>(Months)</b>	<b>Rationale:</b>
	3) Live operational environment data retention period.	N/A	
	4) Archive data retention period.	N/A	
Q7	What is your organisation's current data retention practice (Please specify both time-scale and method)?	<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?	Response Yes	<b>Rationale:</b> 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.
Q9	Do you agree that the type data to be retained should:	Response Yes/No	<b>Rationale:</b>
	2) 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.
	3) 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.)	<p><b>Response</b></p> <p><b>No</b></p>	<p><b>Rationale:</b></p> <p>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.</p>
Q11	Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?	<p><b>Response</b></p> <p><b>Yes</b></p>	<p><b>Rationale:</b></p> <p>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.</p>

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>

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#### **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 except 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 needs 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

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**P107\_ASS\_006 – LE Group**

<b>Respondent:</b>	Tony Diccio
<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	
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'?	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	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	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.
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	
Q9	<b>Do you agree that the type data to be retained should:</b>	<b>Response Yes/No</b>	<b>Rationale:</b>
	1) Prescribed for each market participant role type?	No	
	2) 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	<b>Do you agree that where an archiving mechanism is used that the frequency of archiving should be defined? (e.g. daily, monthly etc.)</b>	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.
Q11	<b>Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?</b>	Yes	
Q12	<b>Do you have any other comments or issues?</b>	<b>Comments:</b>	

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

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'?	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)
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> Yes Yes	<b>Rationale:</b> (see below)

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> 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</b> <b>Yes/No</b> Yes Yes	<b>Rationale:</b>
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> 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	<b>If you do not agree with the timescales proposed in Q5, please specify the appropriate timescale:</b>	<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
Q7	What is your organisation's current data retention practice (Please specify both time-scale and method)?	<b>Details:</b> Relevant settlement data retained indefinitely in the live NHHDA database tables and flat files. 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. HH - Indefinitely on live environment.	

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?	<b>Response</b> <b>Yes/No</b> Yes Yes	<b>Rationale:</b> 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.

No	Question	Response	
Q9	<b>Do you agree that the type data to be retained should:</b>	<b>Response Yes/No</b>	<b>Rationale:</b>
	1) Prescribed for each market participant role type?	No	No, see 2) below.
	2) Defined in broad terms ie. 'relevant Settlement data'?	Yes	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.
Q10	<b>Do you agree that where an archiving mechanism is used that the frequency of archiving should be defined? (e.g. daily, monthly etc.)</b>	<b>Response Yes/No</b>  Yes  yes	<b>Rationale:</b>  If to tape then monthly archive.
Q11	<b>Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?</b>	<b>Response Yes/No</b>  Yes	<b>Rationale:</b>  Yes as disputes are identified by Settlement Day and archiving should following the same schema.
Q12	<b>Do you have any other comments or issues?</b>	<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.	

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**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 Yes</b>	<b>Rationale:</b>
Q3	<b>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>	<b>Response Yes/No Yes</b>	<b>Rationale:</b> Some Trading Disputes are very complex and often involve a number of Parties.

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)	Response Yes/No Yes	<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?	Response Yes/No Yes	<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:	Time period (Months)	<b>Rationale:</b>
	9) Live operational environment data retention period.		
	10) Archive data retention period.		
Q7	What is your organisation's current data retention practice (Please specify both time-scale and method)?	<b>Details:</b> Live operational environment in data warehouse. In excess of 48 months to be kept live operational environment.	
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 Yes	<b>Rationale:</b>
Q9	Do you agree that the type data to be retained should:	Response Yes/No	<b>Rationale:</b>
	1) Prescribed for each market participant role type?	Yes	
	2) Defined in broad terms ie. 'relevant Settlement data'?	Yes	

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.)	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:
Q12	Do you have any other comments or issues?	Comments:	

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**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)

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**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;</b>



	<b>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	Rationale
Q1	<b>Do you agree that P107 better facilitates the relevant BSC Objectives:</b>	<b>Response Yes/No</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>	<i>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. 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.</i>
	'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'?	<b>No</b>	<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. 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 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>
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 YES</b>	<b>Rationale:</b> <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>

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 <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. 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)	Response Yes/No <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>
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 <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:	Time period (Months)	<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 live operational environment 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>
<b>Q7</b>	<b>What is your organisation's current data retention practice (Please specify both time-scale and method)?</b>	<p><b>Details:</b> <i>Core data is held on-line which is in line with current requirements.</i></p>	
<b>Q8</b>	<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>	<p><b>Response</b> <b>Yes/No</b> <b>NO</b></p>	<p><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.</i></p> <p><i>If the cut off points are in place, there should not be a requirement for longer retention except for the limited "Special Cases".</i></p>

No	Question	Response	
Q9	<b>Do you agree that the type of data to be retained should:</b>	<b>Response Yes/No</b>	<b>Rationale:</b>
	4) 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>
	5) 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>
Q10	<b>Do you agree that where an archiving mechanism is used that the frequency of archiving should be defined? (e.g. daily, monthly etc.)</b>	<b>Response Yes/No 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	<b>Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?</b>	<b>Response Yes/No 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>

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**P107\_ASS\_011 – NGC**

<b>Respondent:</b>	Name Paul Robinson
<b>Responding</b>	Please list all Parties / non-Parties / Party Agent responding on behalf of (including the respondent company if relevant).

<b>on Behalf of</b>	National Grid
<b>Role of Respondent</b>	<i>(BSC Party / non-Parties / Part Agent Other (Please specify))</i> Transmission Company

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'?		
	'(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>	<b>Response Yes</b>	<b>Rationale:</b> Disputes typically raised/resolved within this timescale
Q3	<b>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>	<b>Response Yes</b>	<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	<b>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>	<b>Response Yes</b>	<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	<b>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>	<b>Response Yes</b>	<b>Rationale:</b> For disputes to be processed in an efficient manner, having data available in a 'live' environment would promote efficient resolution.

No	Question	Response	
Q6	<b>If you do not agree with the timescales proposed in Q5, please specify the appropriate timescale:</b>	<b>Time period (Months)</b>	<b>Rationale:</b>
	13) Live operational environment data retention period.		
	14) Archive data retention period.		
Q7	<b>What is your organisation's current data retention practice (Please specify both time-scale and method)?</b>	<b>Details:</b>  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.	
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>	<b>Response Yes/No</b>	<b>Rationale:</b> No specific view
Q9	<b>Do you agree that the type data to be retained should:</b>	<b>Response Yes/No</b>	<b>Rationale:</b>
	1) Prescribed for each market participant role type?	<b>Yes</b>	To ensure participants are aware of their obligations
	2) Defined in broad terms ie. 'relevant Settlement data'?		
Q10	<b>Do you agree that where an archiving mechanism is used that the frequency of archiving should be defined? (e.g. daily, monthly etc.)</b>	<b>Response No</b>	<b>Rationale:</b> It should be the responsibility of the participants
Q11	<b>Do you agree that, if approved, P107 should be implemented on a Settlement Day basis?</b>	<b>Response Yes</b>	<b>Rationale:</b>

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

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**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	
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'?	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>	<b>Response Yes/No</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?	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:
	1) Live operational environment data retention period.	24	
	2) Archive data retention period.	48	
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:
Q9	Do you agree that the type data to be retained should:	Response Yes/No	Rationale:
	1) Prescribed for each market participant role type?	No	
	2) Defined in broad terms ie. 'relevant Settlement data'?	Yes	

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>  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?	<b>Response</b> <b>Yes/No</b>  <b>Yes</b>	<b>Rationale:</b>
Q12	Do you have any other comments or issues?	<b>Comments:</b>	

### ANNEX 3 – RESPONSES TO SECOND CONSULTATION

Below are the responses received to the second consultation (28 January 2003 – 4 February 2003).

#### P107\_ASS2\_001 – 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 consider that the refined solution for P107 better facilitates the Applicable 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'?	<b>No</b>	<b>Cannot see any link between competition and data retention period.</b>
	'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'?	<b>No</b>	<b>Does the opposite. Encourages issues to fester rather than being resolved quickly.</b>
Q2	<b>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)? (If not please specify an alternative approach)</b>	Response Yes/No  Yes	Rationale: Will encourage the disputes to be raised earlier

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)? (If not please specify an alternative approach)</p>	<p>Response Yes/No No</p>	<p>Rationale: 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) (If not please specify an alternative approach)</p>	<p>Response Yes/No</p>	<p>Rationale: 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>
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>– 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>Subset</p>	<p>Should be left to the control of the parties/ party agents.</p>
	<p>– 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>	<p>--</p>	<p>Settlement data relevant to the party/parties agent. This is specific to the agent.</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>--</p>	<p>Half hourly data for the metering point.</p>

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: 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 28 months only</p>	<p>Rationale: 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 Yes</p>	<p>Rationale:</p>
Q10	Do you have any other comments or issues?	<p>Comments: Evidence that this change will deliver benefits. 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>	

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**P107\_ASS2\_002 – British Gas Trading**

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

<b>No</b>	<b>Question</b>	<b>Response</b>	
<b>Q1</b>	<b>Do you consider that the refined solution for P107 better facilitates the Applicable 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>	BGT do not believe that this Modification Proposal will better facilitate this particular BSC Objective.
	'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'?	<b>Yes</b>	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.

No	Question	Response	
Q2	<p><b>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)?</b> <b>(If not please specify an alternative approach)</b></p>	<p><b>Response</b> <b>Yes</b></p>	<p><b>Rationale:</b> 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>
Q3	<p><b>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)?</b> <b>(If not please specify an alternative approach)</b></p>	<p><b>Response</b> <b>Yes</b></p>	<p><b>Rationale:</b> 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><b>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)</b> <b>(If not please specify an alternative approach)</b></p>	<p><b>Response</b> <b>Yes</b></p>	<p><b>Rationale:</b> 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><b>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?</b></p>	<p><b>Response</b> <b>Complete Copy</b></p>	<p><b>Rationale:</b> 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><b>Response</b> <b>N/A</b></p>	
	<p>– 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>	<p><b>N/A</b></p>	
Q6	<p><b>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?</b></p>	<p><b>N/A</b></p>	



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)	<b>Response</b> <b>Yes</b>	<b>Rationale:</b> 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.
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?	<b>Response</b> <b>All 40 months</b>	<b>Rationale:</b> 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)?	<b>Response</b> <b>Yes</b>	<b>Rationale:</b> 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.
Q10	Do you have any other comments or issues?	<b>Comments:</b>	

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**P107\_ASS2\_003 – Innogy**

<b>Respondent:</b>	Mark Thomas
<b>Responding on Behalf of</b>	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)
<b>Role of Respondent</b>	BSC Party

No	Question	Response	
Q1	<b>Do you consider that the refined solution for P107 better facilitates the Applicable 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>	<b>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.</b>
	'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'?	<b>Yes</b>	
Q2	<b>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)? (If not please specify an alternative approach)</b>	<b>Response  Yes</b>	<b>Rationale:</b>

No	Question	Response	
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)? (If not please specify an alternative approach)	Response  Yes	Rationale:
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) (If not please specify an alternative approach)	Response  Yes	Rationale:
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.
	– 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	
	– 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)	Response  No	Rationale: Frequency of archiving should be up to the individual BSC Party / Agent as long as they meet the overall requirements.
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: Original agent should be under obligation to hold a full 40 months.
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:
Q10	Do you have any other comments or issues?	Comments: None	

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P107\_ASS2\_004 – NGC

<b>Respondent:</b>	<i>Name National Grid</i>
<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>  <i>National Grid</i>
<b>Role of Respondent</b>	<i>(BSC Party / non-Parties / Part Agent Other (Please specify))</i>  BSC Party

No	Question	Response	
Q1	<b>Do you consider that the refined solution for P107 better facilitates the Applicable 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'?		
	'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'?	<b>Yes</b>	<b>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.</b>
Q2	<b>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)? (If not please specify an alternative approach)</b>	<b>Response Yes</b>	<b>Rationale: We support the views of the GSMG that this is an appropriate cut-off timescale as most Trading Disputes are resolved within 28 months.</b>
Q3	<b>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)? (If not please specify an alternative approach)</b>	<b>Response Yes</b>	<b>Rationale: For disputes to be processed in an efficient manner, the data needs to be readily available as in a "live" environment.</b>
Q4	<b>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) (If not please specify an alternative approach)</b>	<b>Response Yes</b>	<b>Rationale: 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.</b>

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.
	– 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.
	– 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
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.

No	Question	Response	
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	

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#### 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

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**P107\_ASS2\_006 – 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 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'?	<b>No</b>	<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. 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>

No	Question	Response	
	'(d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'?	<b>No</b>	<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>
Q2	<p><b>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)?</b></p> <p><b>(If not please specify an alternative approach)</b></p>	<p><b>Response</b> <b>Yes/No</b> <b>Yes</b></p>	<p><b>Rationale:</b></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 28<sup>th</sup> 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><b>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)? (If not please specify an alternative approach)</b></p>	<p><b>Response</b> <b>Yes/No</b> <b>Yes</b></p>	<p><b>Rationale:</b>  <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>  <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>  <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><b>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)</b> <b>(If not please specify an alternative approach)</b></p>	<p><b>Response</b> <b>Yes/No</b> <b>Yes</b></p>	<p><b>Rationale:</b> <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> <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><b>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?</b></p>	<p><b>Response</b> <b>Complete</b> <b>Copy /</b> <b>Subset</b></p>	<p><b>Rationale:</b> <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>
	<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><b>Response</b> <b>Prescribed</b> <b>/ Subset</b></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>
	<p>– 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>	<p>--</p>	<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>

No	Question	Response	
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?	--	<i>Other than under P37, we have not had the requirement to provide data to the TDC.</i>
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/No No	<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 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>
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	<b>Rationale:</b> <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	<b>Rationale:</b> <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><b>Comments:</b></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>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.</p> <p>8, 9, 10) Replace 40 with 28.</p> <p>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.</p> <p>17) Replace 40 with 28.</p> <p>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.</p>

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**P107\_ASS2\_007 – LE Group**

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

No	Question	Response	Rationale
Q1	Do you consider that the refined solution for P107 better facilitates the Applicable BSC Objectives:	Response Yes/No	

No	Question	Response	
	'(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.
<b>Q2</b>	<b>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)? (If not please specify an alternative approach)</b>	<b>Response Yes</b>	<b>Rationale:</b> 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.
<b>Q3</b>	<b>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)? (If not please specify an alternative approach)</b>	<b>Response Yes</b>	<b>Rationale:</b> To support Dispute Final Settlement Runs up to 28 months.
<b>Q4</b>	<b>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) (If not please specify an alternative approach)</b>	<b>Response Yes</b>	<b>Rationale:</b> To support Extra Settlement Determinations beyond 28 months.



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?	<b>Response Complete Copy</b>	<b>Rationale:</b> Retaining a complete copy of the live operational environment will prevent the introduction of ambiguity into the data retention requirements.
	– 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?	<b>Response Prescribed / Subset</b>	
	– 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?	<b>Not applicable</b>	
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)	<b>Response Yes</b>	<b>Rationale:</b> 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?	<b>Response 28 months only</b>	<b>Rationale:</b> The cost of manually transferring archived data is unlikely to outweigh the benefits of capturing this data for the Trading Disputes process.

No	Question	Response	
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)?	<b>Response</b> Yes	<b>Rationale:</b> 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?	<b>Comments:</b>	

## ANNEX 4 – DETAILED LEVEL IMPACT ASSESSMENT RESPONSES

Below are the responses received to the DLIA.

Organisation	Comments
<b>Sue Macklin</b> Scottish and Southern	<p>What impact, if any, will the Proposed Modification have on your organisation? <b>Minor</b></p> <p>What implementation timescale, if applicable, would your organisation require to implement the changes associated with the Proposed Modification? One month</p> <p>If this Modification Proposal is not applicable to your organisation, please indicate why (e.g. proposed changes do not apply to Party Agents).</p> <p>Any other comments: <b>None</b></p>
<b>Tony Savka</b> United Utilities Electricity Plc	<p>Apparently we already keep the data for a longer period than is being proposed and subsequently the change would have no impact.</p>
<b>Rachael Gardener</b> Aquila Networks	<p>No comment.</p>
<b>Rachel Lockley</b> British Energy	<p>What impact, if any, will the Proposed Modification have on your organisation? <b>No change to system code required, however some time required to ensure hardware sizing and appropriate archive strategy put in place.</b></p> <p>What implementation timescale, if applicable, would your organisation require to implement the changes associated with the Proposed Modification? <b>3 months</b></p> <p>If this Modification Proposal is not applicable to your organisation, please indicate why (e.g. proposed changes do not apply to Party Agents).</p>
<b>Ben Willis</b> Npower Ltd, Npower Direct Ltd, Npower Yorkshire Ltd, Npower Northern Ltd, Npower Yorkshire Supply Ltd, Npower Northern Supply Ltd	<p>What impact, if any, will the Proposed Modification have on your organisation? <b>None</b></p> <p>What implementation timescale, if applicable, would your organisation require to implement the changes associated with the Proposed Modification? <b>N/A</b></p> <p>If this Modification Proposal is not applicable to your organisation, please indicate why (e.g. proposed changes do not apply to Party Agents)? <b>We already store all data and have procedures for archiving.</b></p>
<b>Sue Calvert</b> YEDL/NEDL	<p>YEDL and NEDL have no objections to this change.</p>
<b>Clare Talbot</b> NGC	<p>What impact, if any, will the Proposed Modification have on your organisation? <b>Limited impact identified on National Grid.</b></p> <p>What implementation timescale, if applicable, would your organisation require to implement the changes associated with the Proposed Modification? <b>There are no implementation issues for National Grid.</b></p> <p>If this Modification Proposal is not applicable to your organisation, please indicate why (e.g. proposed changes do not apply to Party Agents).</p> <p>Any other comments:</p>

Organisation	Comments
<b>Carmen Page</b> IMServ	<p>What impact, if any, will the Proposed Modification have on your organisation? <b>This change will affect the current archiving process and result in more data being stored on line that is currently held.</b> <b>This increase will mean a re-configuring of the current archiving processes to ensure the additional data is left in the live systems. There is also an additional hardware requirement, to effectively increase the size of the live database by 15-20%.</b></p> <p>What implementation timescale, if applicable, would your organisation require to implement the changes associated with the Proposed Modification? <b>We would expect 6 months from approval of the changes to ensure the necessary hardware was available and in use, and to amend the existing archiving processes.</b></p> <p>If this Modification Proposal is not applicable to your organisation, please indicate why (e.g. proposed changes do not apply to Party Agents). Any other comments:</p>

Organisation	Comments
<p><b>James Russell</b> Scottish Power</p>	<p>We disagree with the proposed changes.</p> <p>What impact, if any, will the Proposed Modification have on your organisation? We believe that by introducing a longer data retention period (overall 40 months) compared with that originally proposed (28 months) will increase the cost burden, by requiring a different archiving and data retention policy to be put in place for the BSC rather than allowing Parties to plan and implement a standard archival and deletion policy for their systems that will meet their obligations to industry as well as addressing their performance and storage issues.</p> <p>What implementation timescale, if applicable, would your organisation require to implement the changes associated with the Proposed Modification? At least 6 months notification would be required. If this Modification Proposal is not applicable to your organisation, please indicate why (e.g. proposed changes do not apply to Party Agents).</p> <p>Any other comments: For this particular consultation, the imposed timescales have been insufficient to give Parties a proper opportunity to fully consider an appropriate response and we view with concern the removal of the “normal” first Assessment question “Do you Agree/Disagree with the proposed changes”. 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.” 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”. 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. 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 duration 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. Proposed changes (refer to P107as Section 4 Summary of requirements): 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. 8, 9, 10) Replace 40 with 28. 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. 17) Replace 40 with 28. 19) BSC Agents (CDCA, CRA, ECVA, 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.</p>

Organisation	Comments
<p>Tony Diccio LE Group</p>	<p>What impact, if any, will the Proposed Modification have on your organisation? No significant impact</p> <p>What implementation timescale, if applicable, would your organisation require to implement the changes associated with the Proposed Modification? <b>No implementation timescale is required to prepare for the changes associated with the Proposed Modification</b></p> <p>If this Modification Proposal is not applicable to your organisation, please indicate why (e.g. proposed changes do not apply to Party Agents). N/a Any other comments:</p>
<p><b>Julia Cabras</b> AccuRead</p>	<p>What impact, if any, will the Proposed Modification have on your organisation? <b>AccuRead would have to spend an estimated £10k on additional storage space and tapes to accommodate the changes proposed in P107. We would have to seek to recover these charges through our Suppliers.</b></p> <p>What implementation timescale, if applicable, would your organisation require to implement the changes associated with the Proposed Modification? <b>The minimum lead time to implement this at present would be a month. However in consideration, we may schedule other work prior to the planned implementation date of P107 and we would ask for a minimum of 6 months notice.</b></p> <p>If this Modification Proposal is not applicable to your organisation, please indicate why (e.g. proposed changes do not apply to Party Agents). <b>N.A</b> Any other comments: <b>As per discussions at STAG and taking into account the small number of Trading Disputes that would utilise archived data, we recommend that the frequency of archiving should be on a monthly basis for periods D+28 and D+40. We appreciate that smaller agents may not be of this opinion but any solution that is devised should take account of best practice for larger agents.</b></p>
<p><b>Derek Livesey</b> United Utilities Electricity</p>	<p>After taking advice from within our company, we do not consider P107 would have any impact on United Utilities Electricity and we are not, therefore, opposed to it.</p>

## ANNEX 5 - BSC AGENT IMPACT ASSESSMENTS

Below are the responses received from the following BSC Agents to the DLIA:

- Assessment 1 in respect of BSC Agents - CDCA, ECVA, SAA, and the CRA
- Assessment 2 in respect of BSC Agent - SVAA
- Assessment 3 in respect of BSC Agent - FAA

### Assessment 1 in respect of BSC Agents - CDCA, ECVA, SAA, and the CRA

NETA Change Form		ELEXON Reference
		P107
Title		Version No.
Data Retention Requirements for Post-Final Trading Disputes		0.1
		Logica Reference
		ICR474
Type of Assessment	Date CP Received	Date IA Issued
DLIA	29/1/03	5/1/03
Brief Summary of Change		
<p><i>This modification is to specify the data retention obligations of NETA CS for use in resolving trading disputes. The requirements that are relevant to NETA CS are as follows:</i></p> <p>Settlement data must be retained for a minimum of 28 months to support Post Final Settlement Runs.</p> <p>Settlement data must be retained for a minimum of 40 months to support Extra Settlement Determinations.</p>		
Logica's Proposed Solution		
<p>The current agreement between Logica and ELEXON is that Settlement data will be maintained for a minimum of 30 months on the live system, thereafter data is archived and can be restored for interrogation purposes. The data must be retained online for a settlement run to be performed against it. ELEXON have stated that for the purposes of Extra Settlement Determinations there is no requirement to perform any settlement run calculation on data beyond 28 months and that the data must merely be made available for use by ELEXON.</p> <p>Based on this understanding, ELEXON's current contractual arrangements with LogicaCMG meet these requirements and therefore the data retention requirements of P107 do not require any system changes.</p> <p>Note: the current agreement does not provide for any variation of these data retention periods in order to support P6.</p>		
Deviation from ELEXON's Solution / Requirements		
None.		

Operational Solution and Impact							
None.							
Testing Strategy							
Unit		Change Specific		End to End			
Module		Operational Acceptance		Participant Testing			
System		Performance		Parallel Running			
Regression		Volume		Deployment/ Backout			
Other:							
Validated Assumptions							
<p><i>There is no requirement to perform settlement calculations against data beyond 28 months from the settlement date.</i></p> <p><i>The requirements in P107 are adequately covered in the contractual arrangements between ELEXON and LogicaCMG and there is no need to amend any documents.</i></p>							
Outstanding Issues							
None.							
Changes to Service							
Services Impacted [ <i>Tick boxes to show impacted systems and associated documentation</i> ]							
	BMRA	CDCA	CRA	ECVAA	SAA	TAA	Other
Software							
IDD Part 1 (Docs)							
IDD Part 1 (S'Sheet)							
IDD Part 2 (Docs)							
IDD Part 2 (S'Sheet)							
URS							
SS							
DS							
MSS							
OSM							
LWIs							
RTP	None						
Comms	None						
Other	None						
Nature of Documentation Changes							



None.		
Nature / Size of System Changes		
N/A		
Type of Release Costed:	N/A	
Deployment Issues, eg Outage Requirements:	N/A	
Impact on Service Levels:	None	
Impact on System Performance:	None	
Responsibilities of ELEXON		
N/A		
Acceptance Criteria		
N/A		
Any Other Information		
None		
Attachments		
P107		
PRICING		
Price Breakdown		
<i>Item description</i>	<i>Remarks</i>	<i>Price (ex VAT)</i>
<i>Change Specific Cost</i>		£0
<i>Project Overhead</i>		£0
Total Price		£0
Project Duration		N/A
Operational Price (per annum)		£0
Rationale		
None.		
Annual Maintenance Price		£0
Rationale		
None.		

Validity Constraints	
No allowance is included in the price for Service Descriptions being different from the CP. No allowance has been included for supporting PwC activities.	
The validity period for this quote is 30 days.	
Authorised Signature	Date Signed

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Assessment 2 in respect of BSC Agent - SVAA

<b>MP No.</b>	<b>107</b>	<b>Title</b>	<b><u>Data Retention Requirements for Post-Final Trading Dispute - Detailed Level Impact Assessment</u></b>
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<b>BCA Name</b>	<b>Clive Mallinson</b>	<b>Assessor</b>	<b>SVA Agent</b>	<b>Date</b>	<b>05/02/03</b>
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<p>Costs</p> <p><u>Initial Costs</u></p> <p>Initial costs for the following</p> <p>To develop and test a script to extract the input files used by DF and RF Settlement runs in a given calendar month.</p> <p>To restore RF and DF input data relating to NETA Settlement dates that has already been deleted from the live environment.</p> <p>To produce monthly CDs for the relevant period up to the date P107 is implemented. (The RF run for the first post-NETA Settlement Date, i.e. 27<sup>th</sup> March 2001, was processed on 17<sup>th</sup> May 2002. The 'catch up' period would therefore need to cover the months from May 2002).</p> <p>£5452</p> <p><u>Ongoing costs</u></p> <p>Ongoing costs to produce a monthly CD containing input files for all RF and DF runs processed during each calendar month</p> <p>£298</p> <p>See comments below.</p>
<p>Timescale implications</p> <p>An elapsed time of one month would be required to complete the initial actions.</p> <p>The backup tape containing the RF input data for Settlement Date 27<sup>th</sup> March 2001 will be recycled on 24<sup>th</sup> May 2003. Therefore the latest date that an order could be placed to ensure the capture of all relevant data from the NETA Start date is 24<sup>th</sup> April 2003.</p>
<p>Risks</p> <p>The requirement to hold an additional four months data online will result in increased backup and recovery times (see comments below). It will therefore increase the risks associated with day to day operations and the disaster recovery service, although this should be acceptable.</p>

Comments

Following recent discussions with ELEXON representatives, the SVA Agent understands the essential requirements arising from Modification Proposal P107 to be as follows:

Providing a capability to undertake Post-Final Settlement Runs (DF runs) for Settlement Dates up to 28 months old, which in practice means that at least 28 months of Settlement data needs to be retained in the live operational environment.

Providing a capability to supply, on request, data relating to Settlement Dates up to 40 months old for use in a manual "Extra Settlement Determination" process to be performed by ELEXON.

The SVA data retention requirements are defined in the agreed SVA Archiving Plan dated 21 March 2002, formal acceptance of which is documented in the letter Cglet101 dated 14 May 2002. The key points in this relevant to P107 are as follows:

It should be ensured that no data remains on the system relating to Settlement Dates older than 28 months once the catch-up archive process has been completed. If there is data present, it should be removed.

All data that meets the following archive criteria can be removed: the data must relate to a Settlement Date that is more than 24 months old; a Final Reconciliation (RF) Run must have been completed for that Settlement Date.

On-going archives shall be scheduled to run on a monthly basis.

All data to be archived must have been previously backed up in accordance with SSL320. These backups will be retained for a period of 4 months.

The Data Retention Period (DRP) will be set to the agreed contractual data retention period, which is currently 28 months.

The SVA Agent shall maintain 8 months worth of input files and output reports on the Live SVA system. Any files that are older than this shall be deleted on an ongoing basis.

Amending the above agreement such that data relating to Settlement Dates up to 28 months old (rather than 24 months) is retained in the live operational environment in case it is required for DF processing should not present a major problem. Indeed, for operational reasons the SVAA is currently holding 28 months of data online, although this is only a temporary arrangement pending further work to enhance backup and recovery times. The main effect of holding an extra four months data online will be to increase the duration of weekly backup runs and disaster recovery restore times by approximately four hours. This will reduce the time available to carry out work on the live system over a weekend, which would need to be taken into account when planning future projects. Also, particularly bearing in mind that data volumes are still growing, it could impact the SVAA's ability to meet the Disaster Recovery target times specified in SSL320. However, the SVAA would be willing to implement P107 on the understanding that SSL320 target times would be reviewed at the time if this should prove necessary.

Following discussions with Tom Bowcutt and James Shuker of ELEXON on 5<sup>th</sup> February 2003, it is understood that the Extra Settlement Process will require data as contained in the files input to the last Settlement run for the Settlement Date concerned (i.e. the relevant RF or DF run). The solution proposed assumes that this is the case.

The required input files are understood to be:

Half Hourly Data Aggregations - D0040 and D0298

Supplier Purchase Matrix - D0041

GSP Group Take Data - P0012

**Comments** (continued)

The additional data retention of the above file types could be achieved by developing a script to extract input files used in every RF and DF run processed in a calendar month, then download these in zipped format to CD(s). This would be run in the first week of the following month. The CD's could then be delivered to the ELEXON Disputes team for storage and use if and when required.

To produce this data for all NETA Settlement Dates some preliminary work will be required to restore data that has already been deleted and then download it to CD as above.

Code Subsidiary Document Changes

BSCP508 section 3.4 Annual Profile Data – The 'When' column refers to request timescales not the period of data covered. The text in the third column defines the amount of data allowable, this being the last full years worth of data (i.e. no more than 23 months old).

**Recommendation**

Not applicable at this stage.

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Assessment 3 in respect of BSC Agent - FAA

NETA Change Form		<b>ELEXON Reference</b>
		MP107
<b>Title</b>		<b>Version No.</b>
Data retention requirements for post-final trading disputes		1.0
		<i>EPFAL Reference</i>
		MP107
<b>Type of Assessment</b>	<b>Date CP Received</b>	<b>Date IA Issued</b>
DLIA	29/01/03	05/02/03
<b>Brief Summary of Change</b>		
<i>Modification P107 – Data Retention Requirements for Post-Final Trading Dispute</i>		
<b>Logica EPFAL's Proposed Solution</b>		
Data retention requirements are satisfied with no impact to current FAA system. All data is stored in the operational environment up to D+40 months.		
<b>Deviation from ELEXON's Solution / Requirements</b>		

None.					
<b>Operational Solution and Impact</b>					
No additional impact (other than already stated in MP61).					
<b>Testing Strategy</b>					
Unit		Change Specific		End to End	
Module		Operational Acceptance		Participant Testing	
System		Performance		Parallel Running	
Regression		Volume		Deployment/ Backout	
Other:					
No testing required.					
<b>Validated Assumptions</b>					
<p>As for MP61, i.e.</p> <p>The frequency of Extra Settlement Determinations (ESDs) is expected to be very low (Elexon estimate 1 every 20 months).</p> <p>Elexon will provide the FAA with 10 days notice to process the payments for an ESD.</p> <p>The FAA will issue advice notes and confirmation notes for the ESD for each bilateral transaction between each party.</p> <p>The "initial" ESD will be processed with the crediting party receiving multiple advice notes and confirmation notes (one for each debiting party) where the sum total will be the amount to be credited.</p> <p>The "unwind" ESD will be processed with the debiting party receiving multiple advice notes and confirmation notes (one for each crediting party) where the sum total will be the amount to be debited.</p> <p>A payment calendar for the scheduling of post final settlement runs ("DF") will be defined by the FAA and communicated to the SAA for approval.</p> <p>Post final settlement run data will be received from the SAA in the same format as all other settlement runs, but will be identified as run type "DF".</p>					
<b>Outstanding Issues</b>					
No feedback received from Elexon on MP61 assumptions.					
<b>Changes to Service</b>					
<b>Services Impacted</b> [Tick boxes to show impacted systems and associated documentation]					
	Funds Transfer System	Other 1		Other 2	
Software	None				

IDD Part 1	None		
IDD Part 2	None		
URS	None		
SS	None		
DS	None		
OSM	None		
RTP	None		
Comms	None		
Other	None		
<b>Nature of Documentation Changes</b>			
None.			
<b>Nature / Size of System Changes</b>			
None.			
<b>Type of Release Costed:</b>	N/A		
<b>Deployment Issues, eg Outage Requirements:</b>	None.		
<b>Impact on Service Levels:</b>	None.		
<b>Impact on System Performance:</b>	None.		
<b>Responsibilities of ELEXON</b>			
Validate stated assumptions for MP106/MP61.			
<b>Acceptance Criteria</b>			
N/A			
<b>Any Other Information</b>			
None.			
<b>Attachments</b>			
DLIA for MP61.			
<b>PRICING</b>			
<b>Price Breakdown</b>			
<b>Item description</b>	<b>Remarks</b>	<b>Price (ex VAT)</b>	
Change Specific Cost		1 day Designer = £1640 0.5 days Project Office Manager = £205  <b>Total = £1,845</b>	

<i>Project Overhead</i>		£0
Total Price		£1,845
Project Duration		N/A
Operational Price (eg per annum or event)		N/A
<b>Rationale</b>		
N/A		
Annual Maintenance Price		£0
<b>Rationale</b>		
N/A		
<b>Validity Constraints</b>		
N/A		
<b>Authorised Signature</b>		<b>Date Signed</b>

## **ANNEX 6 – CORE INDUSTRY DOCUMENT IMPACT ASSESSMENTS**

None received.



## ANNEX 7 – TRANSMISSION COMPANY ANALYSIS

Below is the response received from the Transmission Company:

Q	Question	Response
1	Please outline any impact of the Proposed Modification on the ability of the Transmission Company to discharge its obligations efficiently under the Transmission Licence and on its ability to operate an efficient, economical and co-ordinated transmission system.	We do not believe that the implementation of P107 directly effects the ability of the Transmission Company to discharge its obligations efficiently.
2	Please outline the views and rationale of the Transmission Company as to whether the Proposed Modification would better facilitate achievement of the Applicable BSC Objectives.	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.
3	Please outline the impact of the Proposed Modification on the computer systems and processes of the Transmission Company, including details of any changes to such systems and processes that would be required as a result of the implementation of the Proposed Modification.	There is no direct impact on our systems and processes. We do not believe that there is a specific lead time required for us to be able to implement P107.
4	Please provide an estimate of the development, capital and operating costs (broken down in reasonable detail) which the Transmission Company anticipates that it would incur in, and as a result of, implementing the Proposed Modification.	None identified.
5	Please provide details of any consequential changes to Core Industry Documents that would be required as a result of the implementation of the Proposed Modification.	None identified.
6	Any other comments on the Proposed Modification.	None.

## **ANNEX 8 – TERMS OF REFERENCE AND REPORT**

The following Terms of Reference were utilised by the GSMG:

Modification Proposal P107 will be considered by the Governance Standing Modification Group (GSMG) (with appropriate expertise being provided by the Settlement Standing Modification Group, the Volume Allocation Standing Modification Group and the Trading Disputes Committee) in accordance with the GSMG Terms of Reference.

### **P107 – Data Retention Requirements for Post-Final Trading Disputes**

#### **1. Assessment Procedure**

- 1.1 The Modification Group will carry out an Assessment Procedure in respect of Modification Proposal P107 pursuant to section F2.6 of the BSC.
- 1.2 The Modification Group will produce an Assessment Report for consideration at the BSC Panel Meeting on 13 February 2003.
- 1.3 The Modification Group shall consider and/or include in the Assessment Report as appropriate:
  - Desirable Trading Dispute cut-off timescales and data retention requirements taking into account industry work practices in this area;
  - Any statutory obligations in relation to data retention timescales;
  - The findings of various forums such as the Software Technical Advisory Group (STAG) on audit/data retention issues;
  - The impact of the Modification Proposal upon the BSC Section P6 requirements to correct Past Notification Errors;
  - If the proposed timetable for processing Trading Disputes is reduced, whether this compromises the ability to correct the AA / EAC errors;
  - Whether Parties, Party Agents and BSC Agents should have the same data retention obligations;
  - The interaction of the Modification Proposal with Modification Proposals P63, P78 and P103; and
  - The interaction of this Modification Proposal with Change Proposals CP842 and CP873.

Each of the above Terms of Reference has been considered by the GSMG. The conclusion of the GSMG on the above Terms of Reference are included in Section 4.

### ANNEX 9 – POTENTIAL TRADING QUERY / TRADING DISPUTE TIMELINE

