

## Responses from P106 Draft Report Consultation

Consultation issued 20 February 2003

Representations were received from the following parties:

No	Company	File Number	No. BSC Parties Represented	No. Non-Parties Represented
1.	SEEBOARD	P106_DR_001	1	
2.	Scottish and Southern	P106_DR_002	4	
3.	YEDL & NEDL	P106_DR_003	2	
4.	Powergen	P106_DR_004	15	
5.	LE Group	P106_DR_005	9	
6.	British Energy	P106_DR_006	3	
7.	Innogy	P106_DR_007	9	
8.	Aquila Networks	P106_DR_008	1	
9.	NGC	P106_DR_009	1	
10.	Scottish Power	P106_DR_010	6	
11.	British Gas Trading (late response)	P106_DR_011	1	

P106\_DR\_001 – SEEBOARD

<b>Respondent:</b>	Dave Morton
<b>No. of BSC Parties Represented</b>	1
<b>BSC Parties Represented</b>	SEEBOARD Energy Limited
<b>No. of Non BSC Parties Represented</b>	0
<b>Non BSC Parties represented</b>	
<b>Role of Respondent and Parties Represented</b>	Supplier

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1	Do you agree with the Panel's views on P106 and the provisional recommendation to the Authority contained in the draft Modification Report that it should be made? Please give rationale.	Yes	Change gives required level of clarity to BSC with regard to Supplier Ids. This can be considered to better facilitate administration of BSC and, therefore, relevant objective.
2	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	We do, however, have two issues:  Section S paragraph 1.4.3 (b) (iii) indicates that all metering systems have to be identified as part of notice. This could be construed as either a note that just states how many MPANs are impacted up to requiring a full list of each single MPAN. Further clarification on scope of this requirement would be useful. We would think a note of numbers of systems impacted is sufficient rather than a full list of MPANs.  Section X changes have "ID Transfer Date" defined twice and both refer to wrong paragraph of section S. Definition is in paragraph 1.4.5.
3	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P106? Please give rationale.	Yes	
4	Are there any further comments on P106 that you wish to make?	No	

## P106\_DR\_002 – Scottish and Southern

Dear Sirs,

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 four questions listed in the Consultation Paper, contained within your note of 20th February 2003 concerning Modification Proposals P106, we have the following comments to make:-

Q1 Do you agree with the Panel's views on P106 and the provisional recommendation to the Authority contained in the draft Modification Report that it should be made? Please give rationale.

Yes. This is based, for the avoidance of doubt, on the statement in Section 3.1 of the Assessment Consultation that "[the scenario (b)] restriction will not be applied retrospectively i.e. the small number of Parties who already have multiple Supplier Ids will be permitted to keep them, regardless of how they were acquired". With this in mind we agree with the VASMG's assessment that multiple Supplier Ids under scenario (a) should be possible.

Q2 Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.

Yes. This is based, for the avoidance of doubt, on the statement in Section 3.1 of the Assessment Consultation that "[the scenario (b)] restriction will not be applied retrospectively i.e. the small number of Parties who already have multiple Supplier Ids will be permitted to keep them, regardless of how they were acquired". With this in mind we agree with the VASMG's assessment that multiple Supplier Ids under scenario (a) should be possible.

Q3 Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P106? Please give rationale.

If Modification Proposal P106 is approved, we agree with the proposed BSC Panel recommendation on the timing for the Implementation Date, as outlined in Section 1.1 of the Modification Report.

Q4 Are there any further comments on P106 that you wish to make?

We have no further comments to make.

Regards

Garth Graham  
Scottish and Southern Energy plc

P106\_DR\_003 – YEDL & NEDL

NEDL and YEDL have no comments to make on the Modification Proposal of P106

Thanks

Sue

Sue Calvert  
Distribution Change

P106\_DR\_004 – Powergen

<b>Respondent:</b>	Afroze Miah
<b>No. of BSC Parties Represented</b>	15
<b>BSC Parties Represented</b>	Powergen UK plc, Powergen Retail Limited, Diamond Power Generation Limited, Cottam Development Centre Limited, TXU Europe Drakelow Limited, TXU Europe Ironbridge Limited, TXU Europe High Marnham Limited, Midlands Gas Limited, Western Gas Limited, TXU Europe (AHG) Limited, TXU Europe (AH Online) Limited, Citigen (London) Limited, Severn Trent Energy Limited (known as TXU Europe (AHST) Limited), TXU Europe (AHGD) Limited and Ownlabel Energy Limited
<b>Role of Respondent and Parties Represented</b>	Supplier

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
	Do you agree with the Panel's views on P106 and the provisional recommendation to the Authority contained in the draft Modification Report that it should be made? Please give rationale.	Yes	Although we would prefer there being no limit to the number of additional Supplier IDs under scenario (b), to ensure consensus with the proposed solution, we are prepared to support a limit of two additional Supplier IDs.
	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	
	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P106? Please give rationale.	Yes	The date seems to allow for an adequate period of notification for BSC Parties.
	Are there any further comments on P106 that you wish to make?	Yes	

P106\_DR\_005 – LE Group

<b>Respondent:</b>	<i>Name</i> <b>H MISTRY</b>
<b>No. of BSC Parties Represented</b>	<b>9</b>
<b>BSC Parties Represented</b>	<i>Please list all BSC Parties responding on behalf of (including the respondent company if relevant).</i> <b>LE Group plc, London Electricity plc, Jade Power Generation Ltd, Sutton Bridge Power Ltd, West Burton Power, London Power Networks plc, EPN Distribution Ltd, Seeboard Power Networks plc, Seeboard Energy Ltd</b>
<b>No. of Non BSC Parties Represented</b>	<b>NONE</b>
<b>Non BSC Parties represented</b>	<i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i>
<b>Role of Respondent and Parties Represented</b>	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state)</i> <b>Supplier / Generator / Party Agent / Distribution Business</b>

<b>Q</b>	<b>Question</b>	<b>Response</b> <small>Error! Bookmark not defined.</small>	<b>Rationale</b>
1	Do you agree with the Panel's views on P106 and the provisional recommendation to the Authority contained in the draft Modification Report that it should be made? Please give rationale.	Yes	BETTER FACILITATS BSC OBJECTIVES
2	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	
3	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P106? Please give rationale.	Yes	
4	Are there any further comments on P106 that you wish to make?	NO	

**P106\_DR\_006 – British Energy**

To: Modifications Secretary, BSCCo

P106: Amendment to the BSC to allow Multiple Supplier Ids

We support the proposal as described in the draft Modification Report, noting that:

- \* Avoidance of changes to central agent systems will reduce the implementation cost and increase the effectiveness of the modification in meeting BSC efficiency related Objectives.
- \* Inclusion of an explicit BSC charge on the set of Base BM Units comprised within each Supplier ID treats suppliers with multiple Supplier IDs on an equal basis with other suppliers, and thus reduces cross-subsidy and promotes fair competition.
- \* Use of multiple Supplier IDs appears to be a cost-effective way of accommodating mergers and trade sales, thus facilitating BSC competition and efficiency objectives.

Martin Mate

for

British Energy Power & Energy Trading Ltd

British Energy Generation Ltd

Eggborough Power Ltd

P106\_DR\_007 – Innogy

<b>Respondent:</b>	<i>Richard Harrison, Npower Limited</i>
<b>No. of BSC Parties Represented</b>	9
<b>BSC Parties Represented</b>	Innogy plc, Innogy Cogen Limited, Innogy Cogen Trading Limited, Npower Limited, Npower Direct Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited and Npower Yorkshire Supply Limited
<b>No. of Non BSC Parties Represented</b>	
<b>Non BSC Parties represented</b>	<i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i>
<b>Role of Respondent and Parties Represented</b>	<i>Supplier / Generator/ Trader / Consolidator / Exemptable Generator / Party Agent</i>

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1	Do you agree with the Panel's views on P106 and the provisional recommendation to the Authority contained in the draft Modification Report that it should be made? Please give rationale.	Yes	It supports and makes the existing position more robust.
2	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Qualified Yes	I did suggest some minor amendments to the drafting which might have made this even clearer and avoided the possible need for a further Modification in future, but accept that there is no single perfect answer. If the Panel is satisfied that this text can be interpreted in the way Elexon's response suggested, I am happy. I also raised a query about the effect on the status of existing approved Supplier Entry Processes (hubs), which was not satisfactorily clarified.
3	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P106? Please give rationale.	(No)	Since there do not seem to be any significant 'essential' changes to BSC Systems, we are not convinced by the single (long) 'fall-back' implementation date and believe that a timescale of (say) 2 months after approval by the Authority would be a better way of avoiding unnecessary delay in the event that the first date was not met.



Q	Question	Response Error! Bookmark not defined.	Rationale
4	Are there any further comments on P106 that you wish to make?	Yes	1) It is important that the changes also facilitate the 'closing down' of redundant Supplier Ids (we understand that they do). 2) Assuming that the Modification will be approved and that there will be impacts on Code Subsidiary Documents (e.g. BSCP15), some early consideration needs to be given to the latter.

P106\_DR\_008 – Aquila Networks

<b>Respondent:</b>	<i>Name</i>
<b>No. of BSC Parties Represented</b>	Andy Simpson
<b>BSC Parties Represented</b>	<i>Aquila Networks Plc NHHMO Metering Services Ltd</i>
<b>No. of Non BSC Parties Represented</b>	
<b>Non BSC Parties represented</b>	
<b>Role of Respondent and Parties Represented</b>	<i>BSC Agent - MOA</i>

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1	Do you agree with the Panel's views on P106 and the provisional recommendation to the Authority contained in the draft Modification Report that it should be made? Please give rationale.	Yes	
2	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	
3	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P106? Please give rationale.	Yes	
4	Are there any further comments on P106 that you wish to make?	No	

P106\_DR\_009 – NGC

<b>Respondent:</b>	<i>Name</i> <b>National Grid</b>
<b>No. of BSC Parties Represented</b>	<b>One</b>
<b>BSC Parties Represented</b>	<i>Please list all BSC Parties responding on behalf of (including the respondent company if relevant).</i> <b>National Grid</b>
<b>No. of Non BSC Parties Represented</b>	<b>N/A</b>
<b>Non BSC Parties represented</b>	<i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i> <b>N/A</b>
<b>Role of Respondent and Parties Represented</b>	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state)</i> <b>BSC Party</b>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1	Do you agree with the Panel's views on P106 and the provisional recommendation to the Authority contained in the draft Modification Report that it should be made? Please give rationale.	Yes	We agree with the Panel that this modification will better facilitate BSC objectives c) and d) by removing any potential barriers to the transfer of supply business assets from one BSC party to another and in clarifying the position on the use of Supplier Ids.
2	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	We agree that the legal text addresses the defect identified by clarifying the position in the Code on the use of Supplier Ids.
3	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P106? Please give rationale.	Yes	The implementation date is consistent with the standard release strategy for non-urgent modifications.
4	Are there any further comments on P106 that you wish to make?	No	

P106\_DR\_010 – Scottish Power

<b>Respondent:</b>	Name John W Russell (SAIC Ltd)
<b>No. of BSC Parties Represented</b>	6
<b>BSC Parties Represented</b>	Please list all BSC Parties responding on behalf of (including the respondent company if relevant). Scottish Power UK plc; ScottishPower Energy Trading Ltd.; Scottish Power Generation plc; ScottishPower Energy Retail Ltd.; SP Transmission plc; SP Manweb plc.
<b>No. of Non BSC Parties Represented</b>	
<b>Non BSC Parties represented</b>	Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).
<b>Role of Respondent and Parties represented</b>	(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state) Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent

Q	Question	Response	Rationale
1	Do you agree with the Panel's views on P106 and the provisional recommendation to the Authority contained in the draft Modification Report that it should be made? Please give rationale.	Yes	<i>We agree with the view of the Panel that the transfer of supply assets by, for instance, trade sale is best facilitated by the use of additional Supplier IDs which ensures integrity and accuracy to Settlements. As instances have already occurred where trade sales have taken place, it is appropriate to bring the BSC into line with that reality. The provision of additional Supplier IDs will promote competition and efficiency in the trading arrangements for the reasons outlined in the Modification Report.</i>

Q	Question	Response	Rationale
3	<p>Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.</p>	<p><b>Yes</b></p>	<p><i>Broadly, the legal text is appropriate. However, we note the following (minor) errors which require to be corrected -</i></p> <p><i>Sec. S 1.4.1(a), 2nd line - "..pursuant to and in accordance..."</i></p> <p><i>Sec. S 1.4.3(c) - "be signed by or on behalf of...", add in highlighted word.</i></p> <p><i>Sec. S 1.4.5 - full stop required at the end of sub-para.</i></p> <p><i>Sec. S 1.4.8, 2nd line - "...those provisions shall not affect or limit...". The use of "effect" will give the sub-para a different meaning.</i></p> <p><i>Sec. X definitions - "ID Transfer Date" has the meaning given in Sec. S 1.4.6 and 1.4.7.</i></p>
4	<p>Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P106? Please give rationale.</p>	<p><b>Yes</b></p>	<p><i>There appears to be very little impact on the current systems and processes arising from P106, other than the updating of documentation. Therefore, the implementation dates approved by the Panel appear appropriate</i></p>
5	<p>Are there any further comments on P106 that you wish to make?</p>	<p><b>Yes</b></p>	<p><i>Our previous response indicated that a cost effective solution should be employed in relation to the provision of additional Supplier IDs. We would reiterate this view and see no current requirement for changes to systems intended to make them more robust. Demand for additional Supplier IDs is manageable within the current systems.</i></p>

**P106\_DR\_011 – British Gas Trading (late response)**

**Re: Draft Modification Report P106 Amendment to the BSC to allow multiple Supplier Ids**

Thank you for the opportunity of responding to this draft modification report considering Modification Proposal P106. British Gas Trading (BGT) supports the Modification Proposal and believes this would better facilitate Applicable BSC Objectives (c) as it seeks to provide further clarification on the use and number of multiple Supplier Id's.

The Draft Report documentation also refers to BSC objective (d) for improving efficiency. With regard to this point British Gas believe that although two additional Supplier ID's per Party would be considered sufficient in the current market conditions as highlighted by VASMG, we are mindful that the market place is an evolving industry. The BSCCo have a responsibility to ensure that there agents including SVAA can constantly respond to changing market requirements and where necessary provide more Supplier ID's in the future at no extra cost to the industry.

BGT support the BSC Panel's provisional recommendation and concur with the proposed implementation dates. BGT also agrees that the draft legal text address the defect and is fit for purpose.

If you would like to discuss this matter further please do not hesitate to contact me directly.

Yours faithfully

Andrew Latham  
Senior Account Manager (BSC)