

Meeting name BSC Panel

Date of meeting 10 November 2005

Paper Title ISSUE 19 - 'PARMS - THE WAY FORWARD'

Purpose of Paper For Information

Synopsis Issue 19 PARMS - The Way Forward' was raised by Centrica on 22 September

2005. This paper documents the discussions and conclusions of the Issue 19

Group (the 'Group'), and seeks to inform the Panel of its recommendations.

1. INTRODUCTION

1.1 Standing Issue 19 (the 'Issue') was raised by Centrica (the 'Proposer') on 22 September 2005.

- 1.2 The Issue was raised during the industry consultation on the proposed way forward for the P99¹ Project and PARMS Implementation. Having seen the consultation document, the Proposer requested that a meeting be held so that participants could review and debate the options available to progress the PARMS implementation collectively and to ensure that there is an agreed way forward with industry.
- 1.3 The Group has met twice since Issue 19 was raised. The meetings were held either side of a presentation given to the Panel² (see section 5) detailing the proposed way forward for Approved Modification P99 and PARMS Implementation.
- 1.4 Section 2 of this report provides the background to the P99 Project leading up to the industry consultation, section 4 presents analysis of the materiality of errors in the PARMS system, section 5 details the Panel's views on the way forward for PARMS, and sections 3 and 6 detail the Group's discussions.

2. BACKGROUND

- 2.1.1 Approved Modification P99 was implemented within the Balancing and Settlement Code (the Code) on 1 May 2004. At this time the PARMS system was available for participants to report the new Performance Serials to allow Performance Monitoring and Peer Comparison to commence. In addition, revised Entry Processes, Accreditation and Certification came into effect. The system was not available to calculate Supplier Charges at this time, however the charges against P99 Serials started accruing from 1 May 2004.
- 2.1.2 Approved Modification P99 included changes to the PARMS Serials which precipitated the need to replace the ageing and fragile PARMS system that supported the receipt of data relating to Serials, calculation of Supplier Charges, Peer Comparison and performance reporting. This work has been undertaken by the P99 PARMS Project (the 'Project').

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¹ P99 'Changes to Accreditation and the PARMS Serials and Standards, resulting from the Performance Assurance Framework (PAF) Review (Phase 1)'.

² Panel 97 held on 13 October 2005.

2.1.3 A new and substantially reduced set of Serials were established, of which the following were subject to Supplier Charges:

- SP01 & SP02 Completeness of Reporting by Suppliers

- SP04 Installation of Half Hourly Metering

- SP08 Energy and Metering Systems on Annual Advances and

Actual Readings at each Volume Allocation Run

2.1.4 The new PARMS system, being developed under the Project, receives metering and data collection performance data from both Suppliers and their Agents (including submissions made via e-mail), and processes this in combination with data from the central systems. Monthly reporting periods are used, where charges are applied, caps imposed and the monies thus levied are redistributed.

2.2 PARMS Implementation Approach

- 2.2.1 The changes to PARMS are being delivered in 4 distinct phases, which may be summarised as:
 - 1. Completeness checking;
 - 2. Automated data load & validation;
 - 3. Supplier Charges; and
 - 4. Extreme events.
- 2.2.2 An initial delay in delivering P99 PARMS resulted from the realisation that the new software could not be delivered in time for the P99 Implementation Date (1 May 2004). Nevertheless, each phase was scheduled to be implemented in time to enable the start up of P99 Supplier Charges to intercept with the completion of the run off of the pre P99 Supplier Charges³ (in March 2005). There would thus have been no gap in processing, since completion of the run off of the pre P99 charges is a prerequisite for starting the P99 charges.
- 2.2.3 This approach meant that when P99 PARMS was implemented a catch up process would be used to calculate Supplier Charges, in 3 month blocks, and to issue the associated reports and invoices for all reporting periods dating back to the P99 Implementation Date.

2.3 Completeness Defect

2.3.1 Phases 1 and 2 were implemented on 1 May 2004 and 16 August 2004 respectively. Following deployment of Phase 2, it became apparent that the completeness checking process was introducing intermittent errors. Furthermore the very process of resolving these errors has at times introduced further issues.

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³ A number of the Serials reported under pre P99 relate to Settlement Date performance. As a result, pre P99 Serials need to be run off until the appropriate Settlement Runs have been conducted.

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- 2.3.2 The consequence of these issues was to produce occasional incorrect completeness reports and to partially corrupt the stored data. These data problems would, if left uncorrected, result in some incorrect charges being calculated for Serial SP01 (Delivery of Routine Performance Reports) on implementing Phase 3 (Supplier Charges).
- 2.3.3 Following discussions with the developer, substantive project work was suspended and a design review was undertaken to ascertain the underlying issues. This review confirmed that there are serious issues with the design and implementation of completeness checking.
- 2.3.4 The exact overall materiality of these completeness checking issues is unknown. Illustrative of the issue is that there are 24 different possible sequence combinations by which Suppliers and Agents can submit data into PARMS. The more popular, standard methods of submission appeared to be operating correctly, however the more obscure combinations have been found to introduce errors and further corrupt data relating to completeness already in the database.
- 2.3.5 The design review concluded that the complexity of the design was partially driven by the business rules in BSCP 533 'PARMS Data Provision' being open to interpretation.
- 2.3.6 Testing on Phase 3 of PARMS has continued, and from the reports generated, it appears that the Supplier Charge functionality is operating correctly. However this cannot be fully verified until testing on Phase 3 has been completed.
- 2.3.7 To provide an indication of the materiality of SP01 charges, PARMS reports including and excluding SP01 charges have been generated from the May 2004 to March 2005 Reporting Periods.

2.4 Consultation Document - Proposed Way Forward

- 2.4.1 Following the design review it became apparent there was no easy or quick solution to resolving the defects surrounding completion checking.
- 2.4.2 The P99 Project Board assessed all the options available and proposed a way forward for the P99 Project Team. The considerations, concerns and the approach taken by the Project Board were captured in the consultation document 'Resolving the Design Issue A Way Forward'. 4
- 2.4.3 The consultation document made a number of recommendations and conclusions which are summarised here:
 - ELEXON recommended that indicative Supplier Charges be published from the PARMS test database to provide participants with an indication of the charges (or receipts) they are likely to accrue. This data would have a number of caveats applied, but mainly it should be recognised that the data contains known defects and therefore Parties should not assume the reports contain their final charge (or receipts);
 - The business rules within BSCP 533 to do with completion checking should be reviewed outside of the project;

⁴ A copy of the consultation document and responses can be found on the BSC Website at: http://www.elexon.co.uk/consultations/closed/default.aspx?start_date=01/01/2005

- Under the BSC as currently drafted, the Panel and its committees do not have the right to make retrospective simplification to BSCP 533;
- Only a single set of business rules should be applied to PARMS;
- An operational workaround delivering completion checking would not be desirable; and
- Completeness checking should be resolved prior to Phase 3 PARMS being implemented. This
 means the Supplier Charges are unlikely to recommence until August 2006 and that catch
 up would be achieved by July 2007. (This approach has subsequently been entitled 'Resolve
 and Restart').
- 2.4.4 Under this recommended approach, the proposed timetable of events would be:

Event	Key Dates
Issue Indicative Supplier Charge Reports (1 May 2004 – April 2005)	October 2005 ⁵
Implement PARMS and begin Supplier Charge Catch-Up	August 2006
Complete Supplier Charge Catch-Up	July 2007

2.4.5 The consultation document sought to gain industry opinion on ELEXON's proposed way forward for the Project. The document was sent to industry on 15 September 2005 with responses due on 29 September 2005.

3. ISSUE 19 GROUP MEETING 1

- 3.1 The Issue 19 Group ('Group') met for the first time on 27 September 2005.
- 3.2 The Proposer explained that the Issue had been raised as a result of concerns the Proposer had about the proposed direction of the Project, the escalating costs and further delay to the catch up of Supplier Charges. The Proposer wanted an open forum to discuss the issues raised in the consultation so that there would be an increased transparency to industry, and so there could be a collective understanding of the proposed approach.
- 3.3 The Proposer recommended that discussions were not only confined to the proposed way forward in the consultation document, but that all avenues were considered. The Proposer did not wish to go over previously held discussions and Proposed Modifications relating to P99. For this reason the Proposer wished to exclude references to Rejected Modification Proposal P143⁶.
- 3.4 ELEXON briefed the Group on the project background, the current project status and the events leading up to the consultation.

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⁵ Data to be issued following the October 2005 PAB meeting.

⁶ P143 "Revision of P99 to Halt the Progression of the Performance Assurance Monitoring System (PARMS) Serials, Standards and Supplier Charge Elements".

- 3.5 The Group noted that the design review revealed serious flaws in the PARMS design, and that this stemmed from:
 - The business rules with respect to completion checking in BSCP 533 not being sufficiently detailed, leading to additional complexity being introduced when translating the rules into the system design. In addition to this, the receipt of data from multiple sources has led to PARMS currently supporting 24 different sequence combinations in which data can be submitted and processed for completion, some of which are very complex and have been identified to contain defects.
 - The complex system design has resulted in a lack of robustness and furthermore it has led to more defects occurring when attempting to fix known defects.
- 3.6 The Group noted that the PARMS system operator has identified on average one new defect a month since PARMS Phase 2 had gone live. There is therefore a severe lack of confidence in the current design of the completeness processing, hence the approach taken to simplify the design initially before resolving any defects.
- 3.7 The Group discussed a number of points:
 - The Group asked in what way the system was not robust. ELEXON explained that the defects manifest themselves two ways:
 - Changing of completion status in the completion log of Suppliers from month to month, which if charged upon would lead to some Suppliers being incorrectly charged for SP01 late days; and
 - Completion log not being correctly populated in the first instance.

These manifestations contribute to the database being corrupted and the original completion status being irretrievable; this can only be corrected, by determining what the status should be, and either correcting through a back end manual process, or resubmitting all the data.

In addition, it results in spurious completion reports being sent to Suppliers stating they are complete, where they are really incomplete. This could potentially lead to Suppliers accruing late days because they think they have submitted all their data.

The Group asked why changes could not be made retrospectively.

The legal advice provided to ELEXON states that the Panel and Panel Committees do not have the right or capacity to make any changes retrospectively, unless authorised to do so through the Code i.e. a Modification would be required as there is no such authorisation anywhere in the Code.

For purely prospective Modifications, P99 would need to be delivered as it currently stands. The P99 baseline would need to be enforced for the time between the P99 Implementation Date and the Implementation Date of any prospective Modification.

 The Group asked how the business rules could be simplified in BSCP 533, as the rules are already very broad.

It was explained to the Group that because the rules were very broad, the system was designed to permit data to be submitted in multiple sequence combinations, and therefore meets a wide variety of requirements. The business rules could be simplified by making the completion rules in BSCP 533 more prescriptive, and therefore would specify exactly what is and is not allowed.

The Group noted that if the design review recommendations are implemented, such a solution could be implemented more simply.

• The Group asked for details of the potential materiality of SP01 charges and the proportion of the SP01 charges that are corrupted by defects.

The Group noted that SP08 charges made up the highest proportion of charges, and SP01 makes up approximately 10% of Supplier Charges across the industry. Because of the nature of the defects it is difficult to fully ascertain which SP01 charges are correct and which SP01 charges are incorrect.

ELEXON agreed to provide the Group with an indicative report of the potential materiality of the error caused by the SP01 charges across all Suppliers (see section 4), for the known errors.

ELEXON also explained that Suppliers could assess their own SP01 exposure (albeit caps and redistributions will impact their final net position) by reviewing the information in their completeness reports against their Third Party reports and Data Provider Information and that this should enable any discrepancies to be identified.

ELEXON agreed to reissue all completeness reports to Parties so they can identify if they believe they are complete or not for any reporting periods.

• The Group asked if there is a disputes process in place, which would allow Parties to dispute any SP01 charges if Supplier Charges were to begin with the defects still in place.

It was confirmed that there is a query process for resolving incorrect Supplier Charges, where Parties can provide evidence to the Performance Assurance Board (PAB) if they feel they have been incorrectly charged. This process only applies after the Supplier Charges have been approved and formally issued by the PAB⁷. The Group noted that through taking an approach of implementing the Supplier Charges now and applying fixes later, there was a chance that new defects are introduced into the system through the fixing process.

• The Group asked how the system design could be simplified under the current baseline as the consultation document proposed:

The database design would be simplified by curtailing complexity which was introduced into the initial design as a result of ambiguity over the handling of certain serial types.

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⁷ The Code allows a 10 Working Day window for appeals following receipt of reports.

The system process design would be simplified by separating out the file loading and population of completeness table into 2 separate processes. This functionality is currently a single automated process which is the source of a number of defects.

- 3.8 Following the discussion on the points above, the Group identified 3 possible options:
 - 1) Implementing the recommendations of the design review, and using these to resolve all the issues in the PARMS system in a final build of the software. This build would include design review fixes to completion checking, and delivery of Phases 3 and 4. Supplier Charges would restart in August 2006 with catch up to be completed by July 2007. ('Resolve Restart')
 - (ELEXON would issue Parties' indicative Supplier Charge figures with appropriate caveats applied, to provide Parties with an indication of what their charges are likely to be.)
 - 2) Implement the Phase 3 system, with the knowledge that the SP01 charges contain defects. In parallel work would continue fixing the SP01 defects as specified in option 1. Once a final build is implemented a rerun of Supplier Charges from May 2004 would begin, and any difference in charges would be subject to a reconciliation process. ('Restart Resolve Reconcile')
 - 3) Implement Phase 3 software, with SP01 charges waived. Apply simplified prospective business rules for completion checking and apply charges going forward. ('Remove Restart')
- 3.9 The Group noted that option 1 was ELEXON's preferred option, as it is the only option where accurate SP01 charges would be levied on Suppliers and which is consistent with the Code and the Code Subsidiary Documents.
- 3.10 The Group noted that option 2 would mean running Supplier Charges twice, with the second run being a reconciliation run. This could potentially lead to multiple queries being raised by Parties relating to the first set of reports produced. The approach was considered to be inefficient, but could be appropriate if the materiality of the error was low. Final reconciliation of Supplier Charges would not be completed until July 07, which is the same as proposed in option 1.
- 3.11 The Group noted that option 3 would only be possible through a Modification being raised by a Party and approved by the Authority and would be a retrospective change. It was noted that it would be possible to postpone processing of SP01 charges under the current baseline but not waive them completely. Any postponement of SP01 charges would however mean re-running the entire suite of Supplier Charge Serials again, as the current PARMS functionality does not allow running of individual Serials separately.
- 3.12 The Group agreed that option 1 seemed to be the most viable solution but felt the situation and time it would take to restart Supplier Charges and complete catch up was unpalatable to industry.
- 3.13 The Group asked how confident ELEXON was with the dates provided in the consultation document. ELEXON confirmed that the estimate was based upon Service Provider estimates of expected delivery time for software. ELEXON would confirm timescales based on detailed planning.

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- 3.14 The Group considered another option, to submit blank Data Provider Information (DPI) into PARMS. It was speculated that this could result in the SP01 charges not being calculated because of insufficient data being provided, and hence provide the PAB with authority to waive SP01 charges. ELEXON agreed to look into this option but noted that the DPI file is used to ensure a full suite of data had been provided and helps fulfils this obligation. Without accurate DPI files a Supplier could avoid paying other Supplier Charges as the DPI would not contain data for other Serials that may be expected.
- 3.15 A suggestion was made to consider granting a derogation against Supplier Charges. It was questioned whether it would be also possible that the derogation be applied to retrospective Settlement Dates.⁸
- 3.16 The Group agreed to await the responses to the industry consultation and subsequent discussion held by the Panel before meeting again.

4. ANALYSIS OF MATERIALITY

- 4.1 At the first meeting, the Group asked whether data relating to the 'materiality' of the charges associated with the PARMS completeness processing, and subsequent generation of values for SP01, could be made available to the Group.
- 4.2 Following the meeting ELEXON issued some analysis of the indicative Supplier Charges (including SP01) for the Reporting Periods May 2004 to March 2005 from the PARMS test database (see attachment 1). The data was provided in an un-attributable form but covered all 47 Suppliers in PARMS.
- 4.3 There are a number of known errors in completeness checking that affect these figures. The fixes for some of these errors are sufficiently far advanced for it to be possible to identify the SP01 charges they impact. Such charges were highlighted in the analysis.
- 4.4 The analysis has identified that potentially 8 Suppliers have their Supplier Charges affected by a known error in completion checking, materialising in the SP01 charge. The total charges incurred by these Suppliers between May 2004 and March 2005 were approximately £2,200. However, all but 1 of the Suppliers impacted by these errors has either left the market or has no Metering Systems. Thus for 7 of the 8 Suppliers, there is no material impact.
- 4.5 The charges for the remaining Supplier were expected to be negligible.
- 4.6 It should be noted that the analysis was based on the known errors which had been analysed. There are further known defects and potentially erroneous scenarios which were not covered by this analysis. The materiality of these has not yet been assessed.

⁸ This would have similar effect similar issues to a Modification, but without the Transparency of a Modification.

5. CONSULTATION RESPONSES AND PANEL

- 5.1 The responses received to the consultation document indicated majority dissatisfaction with the delay in delivering PARMS, but there was support for PARMS to be delivered reporting accurate charges, and not containing any known errors in the system.
- 5.2 The consultation responses and options for the way forward were presented to the Panel meeting on 13 October 2005.
- 5.3 The discussions held by the Panel are fully detailed in the Panel minutes. In summary, the Panel view was that, in order to restart charges and submit invoices for SP01 containing known errors, the Panel must be satisfied that it is legal to do so (either through its own vires, obtaining the consent of affected Parties, or a Modification to the Code). This would ensure that any challenge would not be successful.
- 5.4 Ofgem suggested there were options available to Parties, the Panel and ELEXON including the raising of a Modification. Ofgem did not believe delaying the restart until August 2006 (under Resolve and Restart) was acceptable and that it was ELEXON's responsibility to implement the Code in an efficient and effective manner.
- 5.5 ELEXON cautioned against removing SP01 lest this should compromise other Serials that are dependent on complete Supplier data being provided. Thus the issues around completeness would still need to be evaluated and remedies applied.

6. ISSUE 19 GROUP MEETING 2

- 6.1 The Group met for a second time on 1 November 2005. The Group noted that the Proposer wished for Issue 19 to be closed, but that it was incumbent on the whole Group to decide when an Issue should be closed.
- 6.2 The Group noted the discussions held by the Panel and the developments since the last meeting. ELEXON explained that in response to the views expressed by industry, the Panel and Ofgem, ELEXON had been investigating further options for expediting the delivery of PARMS.
- 6.3 In addition to the three options discussed at the first Issue 19 meeting, ELEXON presented a fourth option to the Group, which could deliver PARMS before August 2006, provide correct results without any reconciliation process, and which would not necessitate any Modifications or Change Proposals. ('Workaround Restart Resolve')
 - This solution involves a workaround process which would be deployed at the same time as PARMS is implemented. The workaround would be used to identify any occurrences of potential errors in the database. It is based around running a series of 'health check' scripts that have been produced following the design review.
 - Each potential occurrence of a defect would then be investigated to confirm if there is an actual error. The database would be manually corrected where errors have occurred.
 - The workaround would remain in place for the period of time until the defects in PARMS are resolved in accordance with the design review recommendations.

- This solution is still contingent on ELEXON agreeing on the database scripts which identify the potential errors. Furthermore in order to assure the integrity of the solution, the process and supporting utilities would need to be demonstrable.
- 6.4 The Group agreed that of the 4 solutions presented to the Group, this option is the most efficient solution in terms of times and cost for delivering correct charges to Industry, and completing the catch up exercise. It was noted that this solution would be more expensive than 'resolve and restart' as it would require a manual workaround. However it was believed that these costs would be minimal as the workaround would be carried out using normal operating resource.
- 6.5 The Group supported ELEXON pursuing this option. The Group also felt that with this option there would be no need to raise a Modification or Change Proposal.
- 6.6 The Group also noted that adopting a reconciliation approach (as required under the 'Restart Resolve Reconcile' approach) may require a Modification to the Code to allow ELEXON to knowingly produce incorrect invoices with the knowledge that these would be corrected during a reconciliation process. The Group therefore felt that the workaround option provides distinct advantages over any reconciliation approach.
- 6.7 One member stated that it was important that catch-up is completed by the end of 2006, to ensure that Party's finances do not contain uncertainties for another year⁹. ELEXON confirmed, that this could be achieved (assuming no further issues arise) under 'Workaround Restart Resolve'.
- 6.8 ELEXON confirmed that the details behind the workaround solution would be presented to the Panel meeting on 10 November 2005, and that ELEXON is working towards delivering this option.

7. CONCLUSIONS

- 7.1 The Group supports the solution to deliver PARMS with a workaround in place until defects in the System are resolved.
- 7.2 The Group has agreed that no Modifications or Change Proposals are necessary.

List of appendices

Appendix 1 – Issue 19 Attendance List

List of attachments

Attachment A – Analysis of SP01 materiality

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⁹ Some companies have a financial year end of December.

APPENDIX 1 - ISSUE 19 ATTENDANCE LIST

Member	Organisation	Email	27/09	1/11
Sarah Jones	ELEXON (Chairman)	Sarah.jones@elexon.co.uk	✓	✓
Sakib Azam	ELEXON (Lead Analyst)	Sakib.Azam@elexon.co.uk	✓	✓
Claire Walsh	Centrica(Proposer)	Claire.Walsh@centrica.co.uk	✓	Х
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Rosie McGlynn	Powergen	rosie.mcglynn@powergen.co.uk	✓	✓

Attendee	Organisation	Email	27/09	1/11
Ian Anthony	Ofgem	ian.anthony@ofgem.gov.uk	✓	Χ
Richard Hall	Ofgem	richard.hall@ofgem.gov.uk	✓	Χ
Martin Mate	British Energy	martin.mate@british-energy.com	✓	X ¹⁰
Chris Rowell	ELEXON	Chris.Rowell@elexon.co.uk	✓	✓
Alex Grieve	ELEXON (P99 Project)	Alex.Grieve@elexon.co.uk	✓	Χ
David Jones	ELEXON (PARMS Business User)	David.Jones@elexon.co.uk	✓	Х
Richard Cullen	ELEXON (PARMS Operational User)	Richard.Cullen@elexon.co.uk	√	√

 $^{^{\}rm 10}$ Written comments submitted were discussed by the Group.

Issue 19 'PARMS - The Way Forward' Indicative SP01 Analysis from the PARMS Test Database 29th September 2005

- 1. At the Issue 19 meeting on 27 September 2005 the Issue 19 Group ('the Group') asked whether data relating to the 'materiality' of the charges associated with the PARMS completeness processing, and subsequent generation of values for SP01, could be made available to the Group.
- 2. Issue 19 arose from the ELEXON consultation 'PARMS The Way Forward' issued on 15 September 2005. A link to the consultation is enclosed: http://www.elexon.co.uk/consultations/default.aspx
- 3. ELEXON has indicative Supplier Charges (including SP01) information available for the Reporting Periods May 2004 to March 2005 from the PARMS test database. This data provides indicative Supplier Charges (including SP01 values).
- 4. There are a number of known errors in completeness checking that affect these figures. The fixes for some of these errors are sufficiently far advanced for it to be possible to identify the SP01 charges they impact. Such charges have been highlighted when this is the case. There are other known errors that typically only occur in less common business scenarios, where it is not possible at this stage to identify the charges affected. In addition, it is possible that there are other errors that have not yet been detected.
- 5. Below are four graphs for use by the Group:
 - Graph 1 The sum of estimated Supplier Charges for each Supplier ID for the period May 2004 to March 2005, including SP01 values.
 - Graph 2 As Graph 1 but for those Supplier IDs for which there is an error known to affect the SP01 charges (see 4 above). The impact of these errors is limited through the application of Supplier Caps, all of which are relatively small.
 - Graph 3 The sum of estimated SP01 charges for each Supplier ID for the period May 2004 to March 2005, prior to the application of Caps. Supplier Caps are applied to the sum of charges for all Serials and not to individual charges.
 - Graph 4 The estimated difference in charges (either as a loss (–ive) from Graph 1 or a gain (+ive) from Graph 1) for each Supplier ID for the period May 2004 to March 2005, as a result of excluding all SP01 values.

6. Notes:

- The graphs represent data for all Supplier IDs and are coded randomly. The number for each Supplier ID remains the same on all four graphs.
- The data used to derive these graphs is taken from the live PARMS system but also uses software and data still under development to derive SP01 and Supplier Charges executed in a test environment.
- Certain Supplier ID columns in Graph 2 are red. This indicates that ELEXON is aware that some of the SP01 values (though not necessarily all) are incorrect,

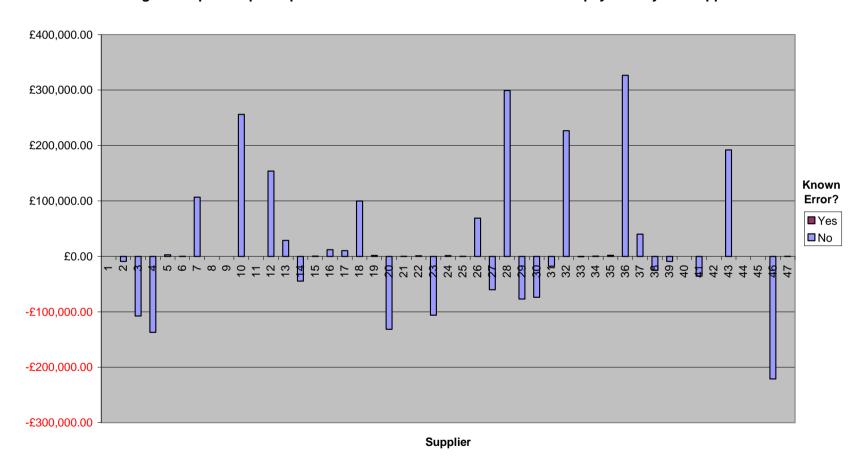
- based on defects identified in the PARMS completeness checking process (see 4 above).
- In accordance with the BSC, SP01 charges are not applicable for the reporting months May-June 2004.
- ELEXON has proposed, within its consultation, to provide individual Supplier IDs with indicative amounts for each Reporting Period from May 2004 to March 2005.
 This will be after the next Performance Assurance Board on 19 October 2005.

Disclaimer:

The data disclosed herein are indicative values only. No reliance shall be placed on the data by BSC Parties, their advisors or agents. BSCCo and the Performance Assurance Board (PAB) accept no responsibility for and exclude all liability whatsoever and howsoever caused in connection with the data and any reliance placed upon such data including but not limited to any liability for errors, inaccuracies, omissions or reliability of the data provided and in respect of which no warranty is given expressly or impliedly by BSCCo or PAB.

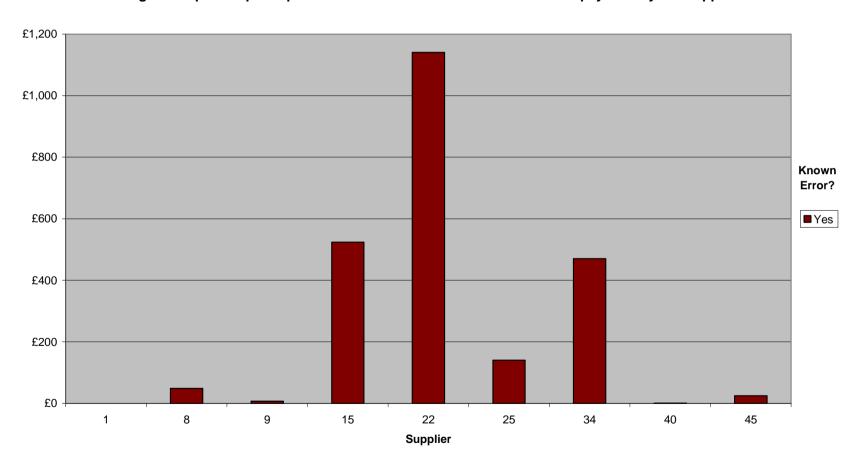
Graph 1

Estimate (based on P99 test data) of Supplier Charges including potentially erroneous SP01 charges. All post Cap and post redistribution. +'ve number indicates a payment by the Supplier.



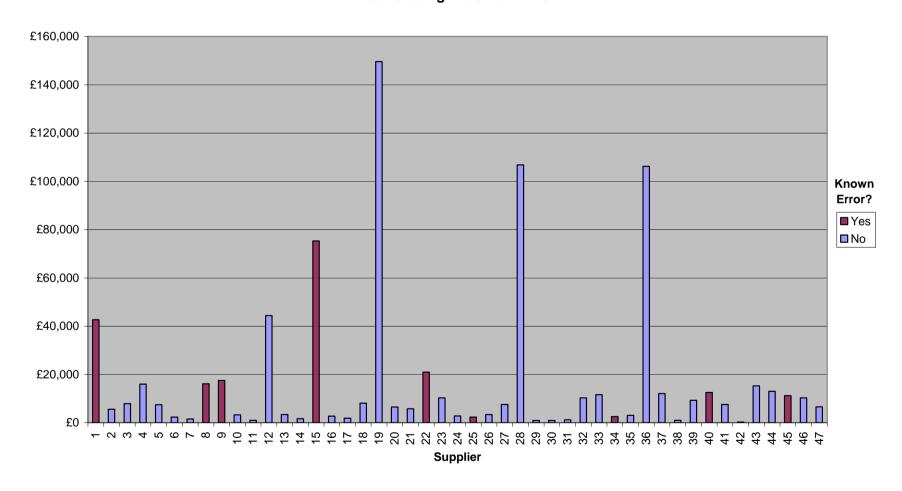
Graph 2

Estimate (based on P99 test data) of Supplier Charges including potentially erroneous SP01 charges. All post Cap and post redistribution. +'ve number indicates a payment by the Supplier.



Graph 3

Estimate (based on P99 test data) of potentially erroneous SP01 charges pre application of the Cap and excluding redistributions



Graph 4

Estimate (based on P99 test data) of the difference in Supplier Charges if SP01 is excluded. +'ve values indicates the Supplier pays less (or receives more) because of the exclusion.

