

## P288 'Aligning Supplier Charge SP08a calculation with current practice'

Consultation issued on 12 November 2012

We received responses from the following Parties

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
RWE npower	10/0	Supplier/Generator/Trader/ Consolidator/ Exemptable Generator/Part Agent
TMA Data Management Ltd	0/1	NHHDC, NHHDA, HHDC and HHDA
ScottishPower	1/0	Supplier
SSE	2/1	Supplier, Generator, Party Agent
British Gas	1/0	Supplier

What stage is this document in the process?

- 01 Initial Written Assessment
- 02 Definition Procedure
- 03 Assessment Procedure
- 04 Report Phase

Question 1: Do you agree that the draft legal, in Attachment A, delivers the intention of P288?

**Summary**

Yes	No	Neutral/Other
5	0	0

**Responses**

Respondent	Response	Rationale
RWE npower	Yes	The legal text aligns the BSC to the calculation being used by PARMS for the calculation of serial SP08a.
TMA Data Management Ltd	Yes	-
ScottishPower	Yes	-
SSE	Yes	Nothing further to add
British Gas	Yes	-

Question 2: Do you agree with the Panel's suggested Implementation Date?

**Summary**

Yes	No	Neutral/Other
4	1	0

**Responses**

Respondent	Response	Rationale
RWE npower	No	<p>The implementation date of 8th January 2013 could potentially still allow Parties to dispute the PARMS SP08a calculation for settlement days prior to this.</p> <p>We believe this Modification is similar to Modification P235, which was raised to correct an inconsistency between the BSC and FAA systems. Following Modification Group meetings a P235 Alternative Modification was put forward with a retrospective implementation date of 27th March 2001 (NETA Go-Live). The Authority subsequently approved P235 Alternative Modification.</p> <p>It seems more appropriate that the implementation date for P288 should retrospectively align the Code with PARMS from 27th March 2001 (NETA Go-Live).</p>

Respondent	Response	Rationale
		This will provide greater certainty for Parties.
TMA Data Management Ltd	Yes	-
ScottishPower	Yes	-
SSE	Yes	Nothing further to add
British Gas	Yes	-

Question 3: Do you agree with the Panel's view that P288 should be progressed as a Self-Governance Modification Proposal?

#### Summary

Yes	No	Neutral/Other
5	0	0

#### Responses

Respondent	Response	Rationale
RWE npower	Yes	There is no impact on BSC Parties or Agents and the Modification meets the Self-Governance criteria
TMA Data Management Ltd	Yes	P288 aims to fix a known inconsistency in the BSC arrangements, the benefits and impacts of P288 relate to efficiency of the BSC arrangements rather than competition, it does not discriminate against any Party, making it a Self-Governance Modification Proposal.
ScottishPower	Yes	-
SSE	Yes	Nothing further to add
British Gas	Yes	-

Question 4: Do you agree with the Panel's views that the Proposed Modification should be approved?

#### Summary

Yes	No	Neutral/Other
5	0	0

## Responses

Respondent	Response	Rationale
RWE npower	Yes	<p>We agree with the Panel's view that P288 better facilitates the achievement of Applicable BSC Objective (d). There is no impact on BSC Parties or Agents and the Modification will remove a potentially confusing inconsistency in the BSC.</p> <p>However, as per our response to question 2, we believe a retrospective implementation date of 27th March 2001 (NETA Go- Live) would be more appropriate. This would provide BSC Parties with greater certainty and is an additional justification against Applicable BSC Objective (d).</p>
TMA Data Management Ltd	Yes	-
ScottishPower	Yes	-
SSE	Yes	For reason of alignment of the calculation of PARMs serial SP08a against the ruleset within the BSC
British Gas	Yes	-

## Question 5: Do you have any further comments on P288?

### Summary

Yes	No	Neutral/Other
0	5	0

## Responses

Respondent	Response	Rationale
RWE npower	No	-
TMA Data Management Ltd	No	-
ScottishPower	No	-
SSE	No	-
British Gas	No	-