



## Responses from P214 Assessment Report Consultation

Consultation Issued on 2 October 2007

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	E.ON UK Energy Services Limited	P214_AR_01	0	1
2.	GRANGEMOUTH CHP LIMITED	P214_AR_02	1	0
3.	E.ON UK plc	P214_AR_03	7	0
4.	SMARTESTENERGY LTD	P214_AR_04	0	0
5.	SAIC Ltd. (for and on behalf of ScottishPower)	P214_AR_05	7	0
6.	EDF Energy	P214_AR_06	9	0
7.	British Energy	P214_AR_07	5	0
8.	Thames Power Services for Barking Power Limited (BPL)	P214_AR_08	1	0
9.	Scottish and Southern Energy	P214_AR_09	5	0
10.	Npower Limited	P214_AR_10	10	0
11.	Gaz De France Marketing Ltd	P214_AR_11	1	0

## P214 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties (“Parties”) and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	<i>Alastair Barnsley</i>
<b>Company Name:</b>	<i>E.ON UK Energy Services Limited</i>
<b>No. of BSC Parties Represented</b>	<i>0</i>
<b>Parties Represented</b>	
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>1</i>
<b>Non Parties represented</b>	<i>E.ON UK Energy Services Limited</i>
<b>Role of Respondent</b>	<i>Party Agent</i>
<b>Does this response contain confidential information?</b>	<i>no</i>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you believe Proposed Modification <b>P214</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes / No	We should like to return a neutral response as this modification will have no direct impact on our activities
2.	Do you support the Modification Group's view that the Implementation Date of P214 should be within a scheduled Release? Please give rationale	Yes / No	We should like to return a neutral response as this modification will have no direct impact on our activities
3.	Do you support the proposed monetary threshold of £500? Please give rationale.	Yes / No	We should like to return a neutral response as this modification will have no direct impact on our activities
4.	Do you support the proposed time threshold of 3 months aligned to the tax year? Please give rationale.	Yes / No	We should like to return a neutral response as this modification will have no direct impact on our activities

Q	Question	Response	Rationale
5.	Would you opt out of receiving posted Advice Notes, Confirmation Notices and backing sheets under P214, such that you only received them by email? Please give rationale.	Yes / No	We should like to return a neutral response as this modification will have no direct impact on our activities
6.	Would P214 result in long-term cost/efficiency savings for your organisation? If yes, please provide details of the savings (including, if possible, their monetary value to your organisation).	Yes / No	We should like to return a neutral response as this modification will have no direct impact on our activities
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale.	Yes / No	We should like to return a neutral response as this modification will have no direct impact on our activities
8.	Does P214 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	Yes / No	We should like to return a neutral response as this modification will have no direct impact on our activities
9.	Are there any further comments on P214 that you wish to make?	No	

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 on Monday 15 October 2007** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email '**P214 Assessment Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Andrew Wright on 020 7380 4217, email address [andrew.wright@elexon.co.uk](mailto:andrew.wright@elexon.co.uk).

## P214 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	HELEN HILL
<b>Company Name:</b>	GRANGEMOUTH CHP LIMITED
<b>No. of BSC Parties Represented</b>	1
<b>Parties Represented</b>	GRANGEMOUTH CHP LIMITED
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	N/A
<b>Non Parties represented</b>	N/A
<b>Role of Respondent</b>	GENERATOR
<b>Does this response contain confidential information?</b>	NO

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification <b>P214</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	COST BENEFITS AND IMPROVED EFFICIENCY
2.	Do you support the Modification Group's view that the Implementation Date of P214 should be within a scheduled Release? Please give rationale	Yes	
3.	Do you support the proposed monetary threshold of £500? Please give rationale.	Yes	HIGH ENOUGH LEVEL TO COVER SMALLER AMOUNTS WITHOUT RISKING BUILD UP OF MONIES OWED
4.	Do you support the proposed time threshold of 3 months aligned to the tax year? Please give rationale.	Yes	TIES IN WITH COMPANY ACCOUNTING TIMETABLE

Q	Question	Response	Rationale
5.	Would you opt out of receiving posted Advice Notes, Confirmation Notices and backing sheets under P214, such that you only received them by email? Please give rationale.	Yes	REDUCES PAPERWORK AND STORAGE REQUIREMENTS
6.	Would P214 result in long-term cost/efficiency savings for your organisation? If yes, please provide details of the savings (including, if possible, their monetary value to your organisation).	Yes	IMPROVED EFFICIENCY IN PROCESSING PAYMENTS
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale.	No	
8.	Does P214 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
9.	Are there any further comments on P214 that you wish to make?	No	

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<b>Respondent:</b>	Alexandra Campbell
<b>Company Name:</b>	E.ON UK plc
<b>No. of BSC Parties Represented</b>	7
<b>Parties Represented</b>	Citigen London Ltd, E.ON UK plc, Economy Power, Enfield Energy Centre Ltd, Powergen Retail Ltd, TXU Europe (AHGD) Ltd, TXU Europe (AHST) Ltd
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	0
<b>Non Parties represented</b>	-
<b>Role of Respondent</b>	Supplier, Generator, Trader, Consolidator, Exemptable Generator
<b>Does this response contain confidential information?</b>	No

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification <b>P214</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	The move to electronic delivery and processing of transactions may reduce Party processing costs. This is likely to lower barriers to entry and as a result, better facilitates Applicable Objective (c) – competition.  With a potential annual central cost saving of approximately £63.5k Applicable Objective (d) – efficiency, is also likely to be met. Updating the Code and aligning it with modern banking practices represents a further efficiency improvement.
2.	Do you support the Modification Group’s view that the Implementation Date of P214 should be within a scheduled Release? Please give rationale	Yes	The Modification introduces time thresholds aligned to the financial year. With this in mind, it seems reasonable for implementation of P214 to follow the usual release strategy.

Q	Question	Response	Rationale
3.	Do you support the proposed monetary threshold of £500? Please give rationale.	Yes	Having studied the BSCCo and FAA analysis, setting the initial monetary threshold to £500 with the option for the Panel to make changes seems appropriate. It is consistent with the aim of the Modification to increase efficiency by reducing the volume of small value transactions processed.
4.	Do you support the proposed time threshold of 3 months aligned to the tax year? Please give rationale.	Yes	Aligning advice notes to the quarterly VAT return dates of March, June, September and December seems sensible.
5.	Would you opt out of receiving posted Advice Notes, Confirmation Notices and backing sheets under P214, such that you only received them by email? Please give rationale.	Yes	A move to emailing Advice / Confirmation Notices offers Parties a more efficient process that is more reliable and has the potential to reduce costs. Assuming no information is lost and there are no tax implications, we would opt out of post.
6.	Would P214 result in long-term cost/efficiency savings for your organisation? If yes, please provide details of the savings (including, if possible, their monetary value to your organisation).	Yes	We would expect that by only printing out the Advice Notes and supporting documentation that is required, long run efficiency savings could be made.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale.	No	
8.	Does P214 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
9.	Are there any further comments on P214 that you wish to make?	No	

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<b>Respondent:</b>	<i>PHILIP SAX</i>
<b>Company Name:</b>	<i>SMARTESTENERGY LTD</i>
<b>No. of BSC Parties Represented</b>	
<b>Parties Represented</b>	
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Trader / Consolidator</i>
<b>Does this response contain confidential information?</b>	<i>NO</i>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you believe Proposed Modification <b>P214</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	Greater automation. Reduction in overhead used to deal with small value transactions
2.	Do you support the Modification Group's view that the Implementation Date of P214 should be within a scheduled Release? Please give rationale	Yes	
3.	Do you support the proposed monetary threshold of £500? Please give rationale.	Yes	Reduction in overhead used to deal with small value transactions
4.	Do you support the proposed time threshold of 3 months aligned to the tax year? Please give rationale.	Yes	The tax year matches our financial year

Q	Question	Response	Rationale
5.	Would you opt out of receiving posted Advice Notes, Confirmation Notices and backing sheets under P214, such that you only received them by email? Please give rationale.	Yes	E Mail is more efficient assuming the Advice Notes are in PDF format
6.	Would P214 result in long-term cost/efficiency savings for your organisation? If yes, please provide details of the savings (including, if possible, their monetary value to your organisation).	Yes	Certainly efficiency savings – but no material cost savings
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale.	No	
8.	Does P214 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
9.	Are there any further comments on P214 that you wish to make?	No	

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<b>Respondent:</b>	Gary Henderson
<b>Company Name:</b>	SAIC Ltd. (for and on behalf of ScottishPower)
<b>No. of BSC Parties Represented</b>	7
<b>Parties Represented</b>	ScottishPower Energy Management Ltd, ScottishPower Generation Ltd, ScottishPower Energy Retail Ltd, SP Transmission Ltd, SP Manweb plc, SP Distribution Ltd, CRE Energy Limited
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	0
<b>Non Parties represented</b>	N/A
<b>Role of Respondent</b>	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
<b>Does this response contain confidential information?</b>	No

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification <b>P214</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	Proposed Modification P214 better facilitates achievement of Objective (c) and Objective (d). Reduced Party costs, derived from a reduction in the volume and value of transactions, will drive increased competition, as will the efficiency savings arising from the introduction of the near instant delivery of Advice and Confirmation Notes (and supporting data) through the use of email. Efficiencies realised by the FAA, through the removal of an aging fax solution, and the reduction in defaults will be reflected to Parties, enabling further savings to be made. Bringing the Code in line with current practice will aid the administration activities currently undertaken by ELEXON and their Agents.

Q	Question	Response	Rationale
2.	Do you support the Modification Group's view that the Implementation Date of P214 should be within a scheduled Release? Please give rationale	Yes	We believe that the normal industry release schedule should be adhered to for this Modification. The solution does not require implementation on a tax year quarter, and even if implementation were just prior to one, efficiency benefits will still be realised.
3.	Do you support the proposed monetary threshold of £500? Please give rationale.	Yes	£500 will provide an adequate roll-up of small value invoices, while minimising market exposure to default loss. It provides a suitable compromise between suitable values for large and small Parties.
4.	Do you support the proposed time threshold of 3 months aligned to the tax year? Please give rationale.	Yes	The backup quarterly threshold is required to ensure that all Parties receive regular invoices, enabling them to track their position and ensuring that funds are paid / received periodically. It also ensured that Parties have a finalised tax year-end position.
5.	Would you opt out of receiving posted Advice Notes, Confirmation Notices and backing sheets under P214, such that you only received them by email? Please give rationale.	Yes	Receiving information via email will allow timely processing of Advice and Confirmation notes. Electronic delivery will allow for more efficient and environmentally friendly record retention. Data can then be analysed in a more efficient manner.
6.	Would P214 result in long-term cost/efficiency savings for your organisation? If yes, please provide details of the savings (including, if possible, their monetary value to your organisation).	Yes	ScottishPower expect to see savings in the volumes of transactions which we will need to process. The time required to process each transaction is also expected to decrease, as well as the associated record keeping processes.

Q	Question	Response	Rationale
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale.	No	
8.	Does P214 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
9.	Are there any further comments on P214 that you wish to make?	No	

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<b>Respondent:</b>	<i>Jerry Morris</i>
<b>Company Name:</b>	<i>EDF Energy</i>
<b>No. of BSC Parties Represented</b>	<i>9</i>
<b>Parties Represented</b>	EDF Energy Networks (EPN) plc; EDF Energy Networks (LPN) plc; EDF Energy Networks (SPN) plc; EDF Energy (Sutton Bridge Power); EDF Energy (Cottam Power) Ltd; EDF Energy (West Burton Power) Ltd; EDF Energy plc; EDF Energy Customers Plc; Seaboard Energy Limited
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>0</i>
<b>Non Parties represented</b>	<i>N/A</i>
<b>Role of Respondent</b>	Supplier/Generator/Trader/Distributo
<b>Does this response contain confidential information?</b>	<i>No</i>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you believe Proposed Modification <b>P214</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	Please do be aware that in reality, it is likely that only small Parties or Parties with minimal or no trading charges will see real benefits. EDF Energy will not see benefits (instead, seeing a small net disbenefit, see our reply to question 6), but is keen to see the wholesale market environment made as attractive as it can be for smaller parties.
2.	Do you support the Modification Group’s view that the Implementation Date of P214 should be within a scheduled Release? Please give rationale	Yes	Yes
3.	Do you support the proposed monetary threshold of £500? Please give rationale.	Yes	Yes – somewhere between £100 and £1000; the research by Elexon on payments indicates that this amount is appropriate and reasonable.

Q	Question	Response	Rationale
4.	Do you support the proposed time threshold of 3 months aligned to the tax year? Please give rationale.	Yes	(however, please be aware that we have not been able within the time available to receive definite confirmation if this is acceptable from our VAT experts)
5.	Would you opt out of receiving posted Advice Notes, Confirmation Notices and backing sheets under P214, such that you only received them by email?	Yes	Yes
6.	Would P214 result in long-term cost/efficiency savings for your organisation? If yes, please provide details of the savings (including, if possible, their monetary value to your organisation).	No	No – the IT infrastructure and system development costs for EDF Energy will slightly outweigh the advantages of this modification
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale.	Yes	Yes. The option to make official, the pre-payment option that could have been made available to parties, appears not to have been as thoroughly explored as it could have been. We believe it would have been a beneficial solution. It could have been limited, to avoid large (6 figure sums) being paid for purposes of pre-payments; the impact on users from this solution would have been very minimal, with only a very small impact on FAA process.
8.	Does P214 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	No, although we would like to see a more thorough exploration of the VAT implications of this modification.
9.	Are there any further comments on P214 that you wish to make?	Yes	Yes – we note the option for receivable and payable thresholds has been removed. This will make the mod more palatable for Parties, but it is not clear what the rationale was for originally including it (perhaps this was because of Elexon's initial legal advice ?)

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<b>Respondent:</b>	<i>Martin Mate</i>
<b>Company Name:</b>	<i>British Energy</i>
<b>No. of BSC Parties Represented</b>	<i>5</i>
<b>Parties Represented</b>	<i>British Energy Power &amp; Energy Trading Ltd, British Energy Generation Ltd, British Energy Direct Ltd, Eggborough Power Ltd, British Energy Generation (UK) Ltd</i>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>-</i>
<b>Non Parties represented</b>	<i>-</i>
<b>Role of Respondent</b>	<i>Supplier/Generator/Trader/Consolidator/Exemptable Generator/Party Agent</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you believe Proposed Modification <b>P214</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes / No	Savings in future payment processing costs for the FAA and for industry parties, particularly smaller participants, should outweigh the costs of implementing the change. However, the modification group should take into consideration participant implementation costs indicated in responses to the parallel impact assessment before coming to a final recommendation based on cost-benefit.
2.	Do you support the Modification Group's view that the Implementation Date of P214 should be within a scheduled Release? Please give rationale	Yes / No	Unconcerned provided at least 3 months notice of firm specification is provided.
3.	Do you support the proposed monetary threshold of £500? Please give rationale.	Yes / No	<a href="#">We do not expect this level of threshold to have significant impact on British Energy's payments.</a>

Q	Question	Response	Rationale
4.	Do you support the proposed time threshold of 3 months aligned to the tax year? Please give rationale.	Yes / No	Unlikely to be an issue for British Energy.
5.	Would you opt out of receiving posted Advice Notes, Confirmation Notices and backing sheets under P214, such that you only received them by email? Please give rationale.	Yes	Yes, subject to a robust contingency plan for email failure, and with the indicated opt-in should our requirements change.
6.	Would P214 result in long-term cost/efficiency savings for your organisation? If yes, please provide details of the savings (including, if possible, their monetary value to your organisation).	Yes / No	Possible small benefits, but unlikely to materially impact cost or efficiency.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale.	No	None identified
8.	Does P214 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
9.	Are there any further comments on P214 that you wish to make?	No	

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<b>Respondent:</b>	Simon Amos, Senior Commercial Analyst Tel: 0208 984 5226
<b>Company Name:</b>	Thames Power Services for Barking Power Limited (BPL)
<b>No. of BSC Parties Represented</b>	1
<b>Parties Represented</b>	Barking Power Limited
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	
<b>Non Parties represented</b>	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
<b>Role of Respondent</b>	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC-Agent/ Party Agent / Distributors / other – please state<sup>1</sup>)</i>
<b>Does this response contain confidential information?</b>	No

Q	Question	Response <sup>1</sup>	Rationale
1.	Do you believe Proposed Modification <b>P214</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes / <del>No</del>	Faxing documents is fast becoming an outdated way of exchanging information. Electronic delivery, streamlining of the process to eliminate large volumes of low value transactions and updating the code to reflect current banking practice seems a sensible approach and sits within Applicable BSC Objective (d), the promotion of efficiency in the implementation and administration of the BSC
2.	Do you support the Modification Group's view that the Implementation Date of P214 should be within a scheduled Release? Please give rationale	Yes / <del>No</del>	While BPL supports the modification, and acknowledges it may be some time before the modification is implemented if approved, it does not warrant implementation outside of the normal scheduled timetable that Parties regularly work towards.

<sup>1</sup> Delete as appropriate – please do not use strikeout, this is to make it easier to analyse the responses

Q	Question	Response <sup>1</sup>	Rationale
3.	Do you support the proposed monetary threshold of £500? Please give rationale.	Yes / <del>No</del>	This seems a reasonable starting point. BPL notes that the Panel would have the ability to redetermine the threshold if required and suggests that this is closely monitored for effectiveness.
4.	Do you support the proposed time threshold of 3 months aligned to the tax year? Please give rationale.	Yes / <del>No</del>	This is likely to fit in with the majority of financial reporting requirements.
5.	Would you opt out of receiving posted Advice Notes, Confirmation Notices and backing sheets under P214, such that you only received them by email? Please give rationale.	Yes / <del>No</del>	Once the email system has proved reliable and robust, BPL would opt out of receiving the same information by post.
6.	Would P214 result in long-term cost/efficiency savings for your organisation? If yes, please provide details of the savings (including, if possible, their monetary value to your organisation).	Yes / <del>No</del>	There would be some initial establishment costs but BPL believes these would be fairly small and would be offset by savings in efficiency, processing and the physical storage of documents. Any cost and efficiency savings made by central services and Elexon would also eventually pass through to BPL via BSC charges.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale.	Yes / <del>No</del>	Is it possible to consider whether 2 monetary thresholds could be introduced to differentiate between different sizes of BSC party.
8.	Does P214 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	<del>Yes</del> / No	
9.	Are there any further comments on P214 that you wish to make?	<del>Yes</del> / No	

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 on Monday 15 October 2007** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email '**P214 Assessment Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Andrew Wright on 020 7380 4217, email address [andrew.wright@elexon.co.uk](mailto:andrew.wright@elexon.co.uk).

## P214 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties (“Parties”) and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	<i>Garth Graham</i>
<b>Company Name:</b>	<i>Scottish and Southern Energy</i>
<b>No. of BSC Parties Represented</b>	
<b>Parties Represented</b>	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	
<b>Non Parties represented</b>	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
<b>Role of Respondent</b>	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributors / other – please state <sup>1</sup>)</i>
<b>Does this response contain confidential information?</b>	

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you believe Proposed Modification <b>P214</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes / No	Yes. We note that this Modification has been developed from Issue 27. We are also mindful of the ongoing postal strike and the impact this is having on communications. The solution proposed with P214; of permitting electronic communication of documentation plus the opt in/out option for receiving postal versions; we believe is a pragmatic solution and we hope for a successful outcome from the discussions with HMRC as noted in section 3.1 of the Consultation Document.
2.	Do you support the Modification Group's view that the Implementation Date of P214 should be within a scheduled Release? Please give rationale	Yes / No	Yes. It avoid unnecessary expense to combine with a scheduled release.

<sup>1</sup> Delete as appropriate – please do not use strikeout, this is to make it easier to analyse the responses

Q	Question	Response	Rationale
3.	Do you support the proposed monetary threshold of £500? Please give rationale.	Yes / No	Yes. As we noted previously, whilst we would have preferred a £100 figure to prevent adverse exposure to the industry from a defaulting party, we accept £500 is a pragmatic figure in the circumstances.
4.	Do you support the proposed time threshold of 3 months aligned to the tax year? Please give rationale.	Yes / No	Yes. We are mindful of the comments in section 2.53 of the Consultation Document and believe the proposed time threshold is appropriate.
5.	Would you opt out of receiving posted Advice Notes, Confirmation Notices and backing sheets under P214, such that you only received them by email? Please give rationale.	Yes / No	We could see this option being attractive.
6.	Would P214 result in long-term cost/efficiency savings for your organisation? If yes, please provide details of the savings (including, if possible, their monetary value to your organisation).	Yes / No	Saving in paper as well as cost could be envisaged with P214.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale.	Yes / No	No.
8.	Does P214 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	Yes / No	No.
9.	Are there any further comments on P214 that you wish to make?	Yes / No	Nothing further at this time.

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## P214 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties (“Parties”) and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	<i>Louisa Stuart-Smith</i>
<b>Company Name:</b>	<i>Npower Limited</i>
<b>No. of BSC Parties Represented</b>	<i>10</i>
<b>Parties Represented</b>	<i>RWE Trading GmbH; RWE Npower Ltd; Npower Commercial Gas Ltd; Npower Cogen Trading Ltd; Npower Direct Ltd; Npower Ltd; Npower Northern Ltd; Npower Northern Supply Ltd; Npower Yorkshire Ltd; Npower Yorkshire Supply Ltd</i>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>None</i>
<b>Non Parties represented</b>	<i>N/A</i>
<b>Role of Respondent</b>	<i>Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you believe Proposed Modification <b>P214</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	The changes being proposed by this Modification aim to reduce the costs currently incurred by Parties in processing invoices and bring about efficiencies in the Funds Administration process. The improvements being proposed meet Applicable BSC Objective (d) as they should improve the efficiency in implementing and administering the BSC. The reduction in the costs of processing invoices that would be brought about by this Modification may also facilitate Applicable BSC Objective (c) by reducing the costs of the Funds Administration process for smaller Parties.
2.	Do you support the Modification Group's view that the Implementation Date of P214 should be within a scheduled Release? Please give rationale	Yes	If this Modification could be released earlier outside a scheduled Release at no additional cost then there could be benefits to Parties. However, if additional costs would be incurred then we would prefer it to be included within a scheduled Release.

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
3.	Do you support the proposed monetary threshold of £500? Please give rationale.	Yes	We are happy with the proposed monetary threshold of £500 and believe this should ensure that less time is spent processing small value transactions.
4.	Do you support the proposed time threshold of 3 months aligned to the tax year? Please give rationale.	Yes	We are happy with the proposed time threshold of 3 months aligned to the tax year.
5.	Would you opt out of receiving posted Advice Notes, Confirmation Notices and backing sheets under P214, such that you only received them by email? Please give rationale.	Yes	We would opt out of receiving posted Advice Notes, Confirmation Notices and backing sheets in preference to receiving them by email.
6.	Would P214 result in long-term cost/efficiency savings for your organisation? If yes, please provide details of the savings (including, if possible, their monetary value to your organisation).	Yes	The implementation of the changes being proposed by P214 would bring about long term cost and efficiency savings for our organisation.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale.	No	
8.	Does P214 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
9.	Are there any further comments on P214 that you wish to make?	No	

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## P214 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties (“Parties”) and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	<i>Chris Wood</i>
<b>Company Name:</b>	<i>Gaz De France Marketing Ltd</i>
<b>No. of BSC Parties Represented</b>	<i>1</i>
<b>Parties Represented</b>	
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Supplier</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you believe Proposed Modification <b>P214</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	Objectives C & D. Reduce cost to better facilitate competition and e-mail/reduced frequency of payments will improve efficiencies.
2.	Do you support the Modification Group's view that the Implementation Date of P214 should be within a scheduled Release? Please give rationale	Yes	The change is not essential and therefore a standard scheduled release seems reasonable.
3.	Do you support the proposed monetary threshold of £500? Please give rationale.	Yes	The analysis carried out by Elexon and the FAA suggests £500 is an acceptable threshold. This will prevent the need for the numerous small default payments.
4.	Do you support the proposed time threshold of 3 months aligned to the tax year? Please give rationale.	Yes	It seems reasonable to tie this in to tax quarters.

Q	Question	Response	Rationale
5.	Would you opt out of receiving posted Advice Notes, Confirmation Notices and backing sheets under P214, such that you only received them by email? Please give rationale.	Yes	Avoid the need for paper based Advice Notes, Confirmation Notices and backing sheets which come in the post – often later than when the payment is made.
6.	Would P214 result in long-term cost/efficiency savings for your organisation? If yes, please provide details of the savings (including, if possible, their monetary value to your organisation).	Yes	Avoid the need to create uploads for default notices. Potentially reduce the number of payments that are made and need to be allocated. Avoid the need for someone to spend time matching hard copy invoices via post/fax with payments made.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale.	No	This seems the most sensible option from discussions with the group.
8.	Does P214 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
9.	Are there any further comments on P214 that you wish to make?	No	

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