

## Responses from P48 Assessment Consultation

Consultation issued 11 January 2002

Representations were received from the following parties:

| <b>No</b> | <b>Company</b>                | <b>File Number</b> | <b>No. Parties Represented</b> |
|-----------|-------------------------------|--------------------|--------------------------------|
| 1.        | SEEBOARD                      | P48_ASS_001        | 2                              |
| 2.        | LE Group                      | P48_ASS_002        | 5                              |
| 3.        | NGC                           | P48_ASS_003        | 1                              |
| 4.        | TXU Europe Energy Trading Ltd | P48_ASS_004        | 13                             |
| 5.        | Dynegy                        | P48_ASS_005        | 1                              |
| 6.        | Powergen Plc                  | P48_ASS_006        | 4                              |
| 7.        | Innogy plc                    | P48_ASS_007        | 6                              |
| 8.        | Calanais Ltd                  | P48_ASS_008        | 5                              |
| 9.        | Scottish & Southern Energy    | P48_ASS_009        | 4                              |
| 10.       | British Gas Trading           | P48_ASS_010        | 4                              |
| 11.       | British Energy                | P48_ASS_011        | 3                              |

**P48\_ASS\_001 – SEEBOARD**

**Name:** Dave Morton

**Organisation:** SEEBOARD

**Response provided on behalf of the following Parties (Please list all Parties):**  
**SEEBOARD Energy Limited and SEEBOARD Power Networks plc**

| <b>Question</b>                                                                                                                                               | <b>Yes/No (with rationale)</b>                                                                                                                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Q1</b> Do you believe that Modification Proposal P48 better facilitates the Applicable BSC Objectives?                                                     | Yes, P48 would provide participants with a prompt view of accurate BSAD data and accurate cash out prices. Without it cash out prices published on the BMRA can only be indicative. It can be argued that this better facilitates Applicable BSC Objectives. |
| <b>Q2</b> Do you believe that the BSC should be changed to incorporate Modification P48?                                                                      | Yes, subject to the cost of doing so being reasonable.                                                                                                                                                                                                       |
| <b>Q3</b> Do you agree with the Modification Group's recommendation for implementation option 3, as detailed in Section 5.1 of the Requirement Specification? | Yes.                                                                                                                                                                                                                                                         |
| <b>Q4</b> Do you wish to make additional comments?                                                                                                            | No further comments.                                                                                                                                                                                                                                         |

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**P48\_ASS\_002 – LE Group**

**Name:** Liz Anderson

**Organisation:** LE Group

**Response provided on behalf of the following Parties (Please list all Parties):**  
**London Electricity, South Western Electricity, Jade Power, Sutton Bridge Power and TXU Europe West Burton Ltd**

| <b>Question</b>                                                                                                                                               | <b>Yes/No (with rationale)</b>                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| <b>Q1</b> Do you believe that Modification Proposal P48 better facilitates the Applicable BSC Objectives?                                                     | Yes, as it will allow more accurate pricing information to be available to participants  |
| <b>Q2</b> Do you believe that the BSC should be changed to incorporate Modification P48?                                                                      | Yes, although we would like to see an assessment of costs                                |
| <b>Q3</b> Do you agree with the Modification Group's recommendation for implementation option 3, as detailed in Section 5.1 of the Requirement Specification? | Yes, as this allows early calculation of cashout prices to include this BSAD information |
| <b>Q4</b> Do you wish to make additional comments?                                                                                                            | No                                                                                       |

P48 Impact Assessment

The implementation of Modification Proposal P48 will / will not impact on our systems and processes.

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**P48\_ASS\_003 - NGC**

**Name:** Phil Lawton

**Organisation:** National Grid

| Question                                                                                                                                                      | Yes/No (with rationale)                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|
| <b>Q1</b> Do you believe that Modification Proposal P48 better facilitates the Applicable BSC Objectives?                                                     | Yes (rationale as outlined in the original Modification Proposal) |
| <b>Q2</b> Do you believe that the BSC should be changed to incorporate Modification P48?                                                                      | Yes                                                               |
| <b>Q3</b> Do you agree with the Modification Group's recommendation for implementation option 3, as detailed in Section 5.1 of the Requirement Specification? | Yes                                                               |
| <b>Q4</b> Do you wish to make additional comments?                                                                                                            | (see comments below)                                              |

**P48 IMPACT ASSESSMENT**

The implementation of Modification Proposal P48 will impact on our systems and processes. National Grid is currently working on the necessary changes to our systems associated with this modification. We have made a commitment under the Procurement Guidelines (as established under Special Condition AA4 of the National Grid Company Transmission Licence) to provide Balancing Services Adjustment Data on a half-hourly basis from 1 April 2002. Our working assumption is that necessary changes will be in place for this date.

**Date:** 09/01/02

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**P48\_ASS\_004 – TXU Europe Energy Trading Ltd**

**Name:** Philip Russell

**Organisation:** TXU Europe Energy Trading Ltd

**Response provided on behalf of the following Parties (Please list all Parties):**

13 TXU Companies

| Question                                                                                                  | Yes/No (with rationale)                  |
|-----------------------------------------------------------------------------------------------------------|------------------------------------------|
| <b>Q1</b> Do you believe that Modification Proposal P48 better facilitates the Applicable BSC Objectives? | Yes – improves administrative efficiency |
| <b>Q2</b> Do you believe that the BSC should be changed to incorporate Modification P48?                  | Yes                                      |
| <b>Q3</b> Do you agree with the Modification Group's                                                      | Yes                                      |

| Question                                                                                                 | Yes/No (with rationale) |
|----------------------------------------------------------------------------------------------------------|-------------------------|
| recommendation for implementation option 3, as detailed in Section 5.1 of the Requirement Specification? |                         |
| <b>Q4</b> Do you wish to make additional comments?                                                       | No                      |

P48 Impact Assessment

The Implementation of P48 will not impact on our systems and processes.

Name: Philip Russell

Organisation: TXU Europe Companies (13)

Date: 15<sup>th</sup> January 2002

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#### **P48\_ASS\_005 – Dynegy**

**Name: Rekha Patel**

**Organisation: Dynegy**

**Response provided on behalf of the following Parties (Please list all Parties):**

| Question                                                                                                                                                      | Yes/No (with rationale)                                                                                                                                      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Q1</b> Do you believe that Modification Proposal P48 better facilitates the Applicable BSC Objectives?                                                     | P48 better fulfils the applicable BSC objectives c and d, by improving the accurately of the BMAD data flow through half-hourly updates.                     |
| <b>Q2</b> Do you believe that the BSC should be changed to incorporate Modification P48?                                                                      | The BSC should be reflective/consistent with any changes that arise through approved modifications.                                                          |
| <b>Q3</b> Do you agree with the Modification Group's recommendation for implementation option 3, as detailed in Section 5.1 of the Requirement Specification? | Dynegy supports the modification group's recommendation for the implementation of Option 3.                                                                  |
| <b>Q4</b> Do you wish to make additional comments?                                                                                                            | The implementation of modification proposal P48 will impact on our systems and processes. We would require 7 days notice to implement the necessary changes. |

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#### **P48\_ASS\_006 – Powergen Plc**

**Name: C A Price**

**Organisation: Powergen Plc**

**Response provided on behalf of the following Parties (Please list all Parties):**

Powergen makes this response on behalf of itself and the following BSC Parties, Powergen Retail Limited, Diamond Power Generation Limited, and Cottam Development Centre Limited.

| Question                                                                                                                                                      | Yes/No (with rationale) |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| <b>Q1</b> Do you believe that Modification Proposal P48 better facilitates the Applicable BSC Objectives?                                                     | Yes                     |
| <b>Q2</b> Do you believe that the BSC should be changed to incorporate Modification P48?                                                                      | Yes                     |
| <b>Q3</b> Do you agree with the Modification Group's recommendation for implementation option 3, as detailed in Section 5.1 of the Requirement Specification? | Yes                     |
| <b>Q4</b> Do you wish to make additional comments?                                                                                                            | No                      |

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**P48\_ASS\_007 – Innogy plc**

**Name:** Shona Watt

**Organisation:** Innogy plc

**Response provided on behalf of the following Parties (Please list all Parties):**

Innogy plc, npower Limited, Innogy Cogen Trading Limited, npower Direct Limited, npower Northern Limited, npower Yorkshire Limited.

| Question                                                                                                                                                      | Yes/No (with rationale)                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Q1</b> Do you believe that Modification Proposal P48 better facilitates the Applicable BSC Objectives?                                                     | Yes, as it increases transparency of the impact of NGC's trading and procurement of balancing services on imbalance prices. It therefore promotes both the efficient, economic and co-ordinated operation by the Licensee of the Licensee's Transmission System <i>and</i> effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity. |
| <b>Q2</b> Do you believe that the BSC should be changed to incorporate Modification P48?                                                                      | Yes, as the benefit described above can be achieved with no further software changes to those implemented through BSC Release 2.                                                                                                                                                                                                                                                                                                                       |
| <b>Q3</b> Do you agree with the Modification Group's recommendation for implementation option 3, as detailed in Section 5.1 of the Requirement Specification? | Yes, as this is the most efficient option. It would enable the accurate calculation and prompt reporting of indicative system prices from April 2002 and the publication of the most up to date BSAD data on BMRS from September 2002 without the need for an Interim Solution.                                                                                                                                                                        |

| Question                                    | Yes/No (with rationale) |
|---------------------------------------------|-------------------------|
| Q4 Do you wish to make additional comments? | N/A                     |

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**P48\_ASS\_008 – Calanais Ltd**

**Name:** Man Kwong Liu

**Organisation:** Calanais Ltd

**Response provided on behalf of the following Parties (Please list all Parties):**

ScottishPower UK Plc.  
 SP Energy Trading Ltd.  
 SP Generation Ltd.  
 Scottish Power Energy Retail Ltd.  
 Emerald Power Generation Ltd.

**Date:** 18/1/02

| Question                                                                                                                                               | Yes/No (with rationale)                                                                                                                                                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Q1 Do you believe that Modification Proposal P48 better facilitates the Applicable BSC Objectives?                                                     | <b>Yes</b> <i>promoting competition and efficiency (presumably earlier reporting of indicative system prices day ahead helps to inform the market and potentially to increase liquidity).</i> |
| Q2 Do you believe that the BSC should be changed to incorporate Modification P48?                                                                      | <b>Yes</b>                                                                                                                                                                                    |
| Q3 Do you agree with the Modification Group's recommendation for implementation option 3, as detailed in Section 5.1 of the Requirement Specification? | <b>Yes</b>                                                                                                                                                                                    |
| Q4 Do you wish to make additional comments?                                                                                                            | our support is subject to the appropriate legal drafting being produced and the comments below.                                                                                               |

**P48\_ASS\_009 – Scottish & Southern Energy**

This response is sent on behalf of Scottish and Southern Energy plc, Southern Electric, Keadby Generation Ltd. and SSE Energy Supply Ltd.

In regard to the 17th December 2001 Elexon Modification Specification to Support Modification P48 and the four questions raised in Attachment 1, we have nothing specific to say at this time about this Modification. However, we would like to remind you of the need to send a formal change request once this Modification is formally adopted.

Regards  
 Garth Graham  
 Scottish & Southern Energy plc

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**P48\_ASS\_010 – British Gas Trading**

**Name:** Danielle Lane

**Organisation:** BGT

**Response provided on behalf of the following Parties (Please list all Parties):**  
**British Gas Trading, Accord Energy, Centrica King’s Lynn, Centrica Peterborough**

| <b>Question</b>                                                                                                                                               | <b>Yes/No (with rationale)</b>                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Q1</b> Do you believe that Modification Proposal P48 better facilitates the Applicable BSC Objectives?                                                     | Yes, implementation of P48 will better facilitate the Applicable BSC Objectives. Centralising the publication of BSAD data will reduce the number of places participants must go to obtain relevant information. This will save time and money for participants. |
| <b>Q2</b> Do you believe that the BSC should be changed to incorporate Modification P48?                                                                      | As the modification better facilitates the applicable objectives it would seem appropriate to change the code to incorporate P48.                                                                                                                                |
| <b>Q3</b> Do you agree with the Modification Group's recommendation for implementation option 3, as detailed in Section 5.1 of the Requirement Specification? | Yes. Option 3 is the most efficient approach. Option 2 would introduce unnecessary development costs for an interim solution to publish data that is currently available on the NGC website.                                                                     |
| <b>Q4</b> Do you wish to make additional comments?                                                                                                            |                                                                                                                                                                                                                                                                  |

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**P48\_ASS\_011 – British Energy**

**MODIFICATION PROPOSAL P48 CONSULTATION QUESTIONS**

**Name:** Martin Mate

**Organisation:** British Energy

**Response provided on behalf of the following Parties (Please list all Parties):**

**British Energy Power and Energy Trading Ltd**

**British Energy Generation Ltd**

**Eggborough Power Ltd**

| <b>Question</b>                                                                                                                                               | <b>Yes/No (with rationale)</b>                                                                                                                                                                                                                                                                                        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Q1</b> Do you believe that Modification Proposal P48 better facilitates the Applicable BSC Objectives?                                                     | Yes, by providing timely publication of market information (imbalance prices and BSAD data itself in due course) to assist efficient competition.                                                                                                                                                                     |
| <b>Q2</b> Do you believe that the BSC should be changed to incorporate Modification P48?                                                                      | Yes                                                                                                                                                                                                                                                                                                                   |
| <b>Q3</b> Do you agree with the Modification Group's recommendation for implementation option 3, as detailed in Section 5.1 of the Requirement Specification? | Yes, ideally the data would be published on BMRS at the same time as it becomes available from NGC, but using the BSAD data for prompt price reporting in advance of making the BSAD data itself available quickly is acceptable as a lower cost solution.                                                            |
| <b>Q4</b> Do you wish to make additional comments?                                                                                                            | Notice of the detailed impact on participant systems should be provided well in advance of implementation. Will post event BSAD data updates appear on the BMRS?<br><br>Section 2.1 of the requirements specification saying "...implemented within the BSC since 25 September 2002." should refer to 2001, not 2002. |