

Responses from P39 Draft Modification Report Consultation

Consultation issued 25 February 2002

Representations were received from the following parties:

No	Company	File Number	No. Parties Represented
1.	Invensys	P39_MR_001	N/a
2.	Innogy Group	P39_MR_002	9
3.	Powergen UK plc	P39_MR_003	3
4.	TXU	P39_MR_004	1
5.	SEEBOARD	P39_MR_005	2
6.	GPU Power UK	P39_MR_006	1
7.	ScottishPower UK plc	P39_MR_007	5
8.	EdF Trading	P39_MR_008	1
9.	Scottish & Southern Energy plc	P39_MR_009	4
10.	British Energy	P39_MR_010	3
11.	British Gas Trading	P39_MR_011	1

P39_MR_001 – Invensys

Subject: P39 Report Comments

NO IMPACT

P39_MR_002 – Innogy Group

This is the response on behalf of Innogy, Innogy Cogen Ltd, NP Cogen Trading Ltd, Npower Ltd, Npower Direct Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd, Npower Northern Ltd, and Npower Northern Supply Ltd.

The Innogy Group agree with the P39 Modification Report as drafted, and have no further comments to make.

Ben Willis
Senior Commercial Analyst
Npower Ltd.

P39_MR_003 – Powergen UK plc

Powergen UK plc welcomes the opportunity to comment on the modification proposal and provides this response on behalf of itself and the following BSC Parties: Powergen Retail Limited, Diamond Power Generation Limited, and Cottam Development Centre Limited.

Modification to the timescales relating to transfer of funds. Powergen acknowledges that, due to the timings of transfers between banks, the FAA is presently unable to confirm full receipt of all amounts due by 13:00. Powergen therefore supports the proposed amendment to the Code.

Immediate calling of Letters of Credit if a Party is in payment default. Powergen again supports the proposed modification to the BSC.

Should you want any further information, or wish to discuss any of the issues raised further, please do not hesitate to contact me.

Yours sincerely,
Geoff Allen
Head of Balancing Mechanism Settlement
Powergen UK plc.

P39_MR_004 – TXU

We support the conclusions and recommendations as drafted.

P39_MR_005 – SEEBOARD

With regard to this proposal we agree with recommendations within section 1.1 of draft modification report dated 25th February.

Dave Morton
SEEBOARD Energy Limited
SEEBOARD Power Networks plc

P39_MR_006 – GPU Power UK

Please find that GPU Power UK response to P39 - Improvements to the Payment Default Process - is 'No Comment'.

Rachael Gardener
Deregulation Control Group &
Disribution Support Office
GPU POWER.NETWORKS (UK) plc

P39_MR_007 – ScottishPower UK Plc

With reference to the above, I would refer you to our previous comments on the proposal.

In this consultation response, we wish to reiterate the view, which we have previously provided in support of Mod P39: Improvements to the Payment Default Process.

The legal drafting appears to be satisfactory.

I trust that you will find these comments helpful. Nonetheless, should you require further clarification of any of the above, please do not hesitate to contact me.

Yours Sincerely,
Man Kwong Liu
Calanais Ltd.

For and on behalf of: - Scottish Power UK Plc.; ScottishPower Energy Trading Ltd.; Scottish Power Generation Ltd.; Scottish Power Energy Retail Ltd.; SP Transmission Ltd.

P39_MR_008 – EdF Trading

Can you please note that EDF Trading Ltd and EdF (Generation) agree with the findings as expressed in the consultative Modification Proposal report P39.

The report gives appropriate and understandable justifications for the recommendations to which EDFT and EdF concur.

Steve Drummond, EdF Energy Merchants Ltd

P39_MR_009 – Scottish & Southern Energy plc

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

In relation to the Modification Report for Proposed Modification P39 contained in your note of 25th February 2002; we agree with the suggested BSC Panel recommendation to the Authority that this Modification proposal P39 be approved, and implemented on 12th August 2002.

Regards
Garth Graham
Scottish & Southern Energy plc

P39_MR_010 – British Energy

P39 - Improvements to the Payment Default Process - Consultation on Draft Modification Report

The draft Modification Report describes pragmatic changes to the BSC to reflect achievable payment and default processes. We believe the changes described will assist in achieving the BSC Objective of promoting efficiency in the implementation and administration of the balancing and settlement arrangements.

Martin Mate
for
British Energy Power & Energy Trading Ltd
British Energy Generation Ltd
Eggborough Power Ltd

P39_MR_011 – British Gas Trading

Thank you for the opportunity of responding to this modification proposal. This response is on behalf of British Gas Trading Ltd (BGT).

BGT support this modification as better facilitating applicable BSC objective d: *'promoting efficiency in the implementation and administration of the balancing settlement arrangements'* by improving the efficiency with which the FAA will be able to administer the payment process under the Code.

Danielle Lane, Transportation Analyst