

ANNEX 1 – REPRESENTATIONS

Responses from P30 Modification Report Consultation

Representations were received from the following parties:

No	Company	File Number
1.	Scottish and Southern Energy	P30_MR_001
2.	SEEBOARD	P30_MR_002
3.	London Electricity	P30_MR_003
4.	ScottishPower	P30_MR_004
5.	TXU Europe	P30_MR_005
6.	Powergen UK plc	P30_MR_006
7.	British Energy Power & Energy Trading Ltd	P30_MR_007

P30_MR_001 – Scottish and Southern Energy

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

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

P30_MR_002 – SEEBOARD

Seeboard agrees that we should proceed with the alternative modification and it should be implemented as soon as possible to enable the process to be in place for the LLF class updates.

Sue Fraser
for DAVE MORTON
0190 328 3465

P30_MR_003 – London Electricity

London Electricity is happy with the Alternative Proposal for P30. We are pleased to see that the Modifications Group has proposed that non-BSC Parties should make a payment towards the cost of provision of the data that they have requested.

Paul Chesterman 08 November 2001
for Liz Anderson,
General Manager, Energy Strategy & Regulation
London Electricity

P30_MR_004 – ScottishPower

Apologies!! Further to my response below, please note that the comments raised have been dealt with in the updated version of the consultation. This is an oversight on our part.

Regards

Man Kwong

Design Authority, Deregulation Services
Calanais Ltd.

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ScottishPower, Manweb and Emerald Power Ltd. support the Alternative Modification as recommended. We however have the following comments on the legal drafting:-

- Section V, Annex V-1, Table 7: Profile Coefficient Data – according to the narrative in the Report, this is to be distributed to any person on an annual basis, but the Table indicates distribution on a monthly basis (although this bit of the drafting is in square brackets).
- The clean version of the drafting only goes so far, i.e. missing out the changes to Sec. V, Annex V-1, Table 7.

I hope you find these comments helpful. If you have any questions on this response, please do not hesitate to contact me.

Regards

Man Kwong Liu
Design Authority, Deregulation Services
Calanais Ltd. for ScottishPower, Manweb and Emerald Power Ltd

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P30_MR_005 – TXU Europe

P30 Draft Modification Report

This response is on behalf of the 12 TXU Europe Companies.

We support the recommendations in the paper of recommending rejection of the Proposal and approval of the Alternative. We note the intention to consider mechanisms for the distribution of BM Unit Aggregation Report separately.

It appears that there are 3 plausible options for this;

- a) Elexon do this as they already have the data in their market monitoring system
- b) The ability to send the current reports is included in Release 2 (or later)
- c) Resolve the SO version of the SAA-I014 issue and the confidentiality issues and let a commercial reporting service evolve.

Our first thoughts on the matter would be that b) or c) would be a more appropriate route to pursue as Elexon's system is already being used for.

Phil Russell
Market Development Manager
TXU Europe Energy Trading Ltd.

P30_MR_006 – Powergen UK plc

MODIFICATION P30 – PROVISION OF BSC DATA TO BSC AND NON-BSC PARTIES

I am responding to the consultation on the draft Modification Report for P30. This response is made on behalf of Powergen UK plc, Powergen Retail Limited, Diamond Power Generation Limited, and Cottam Development Centre Limited.

We agree that P30 should be rejected and replaced with the alternative modification proposal which does not include the BMU Aggregation Report. We also support the principle that non-BSC Parties should pay a fee which includes a contribution towards the implementation costs of the modification.

Yours sincerely,
Paul Jones
Strategy and Regulation

P30_MR_007 – BRITISH ENERGY POWER & ENERGY TRADING LTD

To: Modifications Secretary, BSCCo

British Energy will not be commenting in response to the latest consultation on Modification Proposal P30.

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