ATTACHMENT 1 – REPRESENTATIONS

Responses from P20 Modification Report Consultation

Representations were received from the following parties:

No	Company	File Number
1.	TXU Europe Energy Trading Ltd	P20_MR_001
2.	SEEBOARD	P20_MR_002
3.	Powergen UK plc	P20_MR_003
4.	Scottish Power UK plc	P20_MR_004
5.	Scottish and Southern Energy	P20_MR_005
6.	British Energy plc	P20_MR_006
7.	British Gas Trading	P20_MR_007

P20_MR_001 – TXU Europe Energy Trading Ltd

Thank you for the opportunity to comment on the above modification proposal.

TXU Europe Energy Trading Ltd (responding on behalf of all TXU Europe companies)support the recommendation that both the modification proposal and the alternative modification proposal should be rejected.

Regards

Nicola Lea
Market Development Analyst

P20_MR_002 – SEEBOARD

We agree with the above mentioned report that this modification be rejected.

Dave Morton
SEEBOARD
0190 328 3465

P20_MR_003 – Powergen UK plc

Proposed Variation to BSC – Modification Proposal No: 20 – Revision of Obligations of Parties in Relation to BM Units Registrations.

Powergen UK plc ('Powergen') welcomes the opportunity to comment on the modification report issued for P20 on the 1st August. Powergen provides this response on behalf of itself and the following BSC Parties: Powergen Energy plc, Diamond Power Generation Limited, and Cottam Development Centre Limited.

In response to the modification report Powergen would raise the following points :-

- Further to Powergen's response of the 9th July regarding modification P20, I would reiterate the point raised, that Powergen believe that there are sufficient arrangements already in place to deal with the registration of BM units & thus do not feel that there are any changes necessary to the current arrangements
- Powergen therefore endorse the recommendation of the draft modification report to reject both the original and alternative modifications.

Yours Sincerely
James Hawkins
Strategy & Regulation
Energy Trading
Powergen
02476 42 4737.

P20_MR_004 – Scottish Power UK plc

Modification Proposal P20 –
Revision of Obligations on Parties in Relation to BM Unit Registration

Having reviewed the Draft Modification Report for Modification Proposal P20, we agree with the Panel's recommendation that both the Modification Proposal and the Alternative Proposal be rejected.

I hope that you find these comments to be helpful. If I may be of any further assistance, please do not hesitate to contact me.

Yours faithfully,
James Nixon
On behalf of:
Scottish Power UK plc, Manweb Plc and Manweb Services Ltd.

P20_MR_005 – 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 support the recommendation of the Panel that both the original Modification and the Alternative Modification are rejected. Notwithstanding our previous comments on the Modification, we have no further comments on the Draft Modification Report.

Regards
Robert Hackland

P20_MR_006 – British Energy plc

BSC Modification Proposal 20 - Revision of Obligations on Parties in Relation to BM Unit Registration (Proposal to allow a BSC Party to register BM Units belonging to affiliated parties)

British Energy support the Panel recommendation that this proposal, in its current form, be rejected.

British Energy has not supported this proposed modification, for reasons given in our previous comments to Elexon. However, we accept that in principle there may be benefits in formally allowing a BSC Party to act as an agent for another party in fulfilling that party's obligations under the BSC and/or other codes, agreements and licences. We consider that a wider review of obligations and ultimate responsibilities could be undertaken, including the BSC, Licence conditions, Grid Code, MCUSA/CUSC and associated agreements, Distribution Code and MRA. This review would establish the existing interactions and the full consequences of a change in this area. BSC Parties should always have a route by which appropriate action may be taken against parties breaching their obligations, and this route must ultimately lead to the person(s) physically owning and/or controlling the assets producing, transmitting or using electricity. We see no reason to restrict such a review only to affiliated companies.

Rachel Ace
For:
British Energy Power & Energy Trading Ltd
British Energy Generation Ltd
Eggborough Power Ltd

P20_MR_007 – British Gas Trading

Modification Proposal 20: Revision of Obligations on Parties in Relation to BM Unit Registration

Thank you for the opportunity of responding to this proposal.

British Gas Trading (BGT) do not support either Modification Proposal 20 or the alternative proposal raised. We believe there are methods under the BSC to carry out the functions this proposal seeks to address and hence these proposals do not further the Applicable BSC Objectives. BGT believe that the current MVRN arrangements are inflexible and could be improved. However this does not preclude their use as a solution to the perceived problem identified in this proposal.

BGT are also concerned that there would be a blurring of responsibility for licence obligations as a consequence of this modification.

Yours faithfully
Danielle Lane
Transportation Analyst