

ANNEX 1 – REPRESENTATIONS

Responses from P17 Modification Report Consultation

Representations were received from the following parties:

No	Company	File Number
1.	TXU Europe Energy Trading Ltd	P17_MR_001
2.	London Electricity	P17_MR_002
3.	Powergen UK plc	P17_MR_003
4.	SEEBOARD	P17_MR_004
5.	British Energy plc	P17_MR_005
6.	Scottish Power UK plc	P17_MR_006
7.	Scottish and Southern Energy	P17_MR_007
8.	British Gas Trading	P17_MR_008

P17_MR_001 – TXU Europe Energy Trading Ltd

Thank you for the opportunity to respond to the above modification proposal.

TXU Europe Energy Trading Ltd (responding on behalf of all TXU Europe companies) supports the recommendation that the alternative modification proposal be implemented.

Regards

Nicola Lea
Market Development Analyst

P17_MR_002 – London Electricity

Please find below P17 comments from London Electricity

In our response to the Assessment consultation for Modification P17 – ECVNAs to Receive 7-day Report, London Electricity supported the principle of this modification. However, we also expressed our concern over the cost of this modification and its allocation. There has been still been no indication of the cost of implementation or maintenance of this change. We believe that for changes that benefit the market as a whole, in this case by increasing confidence in third-party ECVNAs, the implementation cost should be included in BSC Agent charges. We also think that third-party ECVNAs should contribute towards the report's running costs should they wish to receive it.

The issue of modification costs has a wider application than just this specific modification. It is difficult to fully assess a modification proposal if there is no indication of the cost associated with it. A cost assessment and how that cost will be recovered should be an integral part of the assessment procedure.

Liz Anderson

(London Electricity, South Western Electricity, Jade Power and Sutton Bridge Power)

P17_MR_003 – Powergen UK plc**Proposed Variation to BSC – Modification Proposal No: 17 – Ecnas To Receive 7 Day Report.**

Powergen UK plc ('Powergen') welcomes the opportunity to comment on the modification report issued for P17 on the 30th July. 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 :-

- Powergen endorses the recommendations contained in the draft modification report to recommend that the alternative modification be approved & implemented.
- Powergen support the introduction under the alternative modification, outlined in section 5 of the report, of a new interface for the enhanced reporting that will be an optional functionality for parties & that the current 'Forward Contract Report' will remain unchanged.

Yours Sincerely
James Hawkins
Strategy & Regulation
Energy Trading
Powergen
02476 42 4737.
1.1

P17_MR_004 – SEEBOARD

We agree with the recommendation from the modification report. However, given we do not have an actual implementation date, we assume that Elexon will keep all participants informed via its change procedures.

Sue Fraser
for DAVE MORTON
0190 328 3465

P17_MR_005 – British Energy plc

British Energy supports the Modification to permit ECVNAs and MVRNAs to receive an appropriate version of the 7 day report. This is reasonable to assist them in the identification and rectification of errors and/or omissions in their notification submissions.

Regards

Rachel Ace

For

British Energy Power and Energy Trading

British Energy Generation

Eggborough Power Ltd

P17_MR_006 – Scottish Power UK plc

Modification Proposal P17 - ECVNAs to Receive 7 Day Report

Having reviewed the Draft Modification Report for this proposal, we concur with the findings that the Alternative Modification would better achieve the aims and objectives of the BSC. We, therefore, support the Panel's recommendation that the Alternative Modification, as set out in Section 7, be implemented as part of the ELEXON BSC Systems Release 2 Project.

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.

P17_MR_007 – 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 the original Modification is rejected and that the Alternative Modification is approved and implemented. We are pleased that our previous comments have been incorporated in the Alternative Modification. We look forward to clarification of the implementation date. We have no further comments on the Draft Report.

Regards
Robert Hackland

P17_MR_008 – British Gas Trading

Modification Proposal 17: ECVNAs to Receive 7-Day Report

Thank you for the opportunity of responding to this modification. British Gas Trading supports the Alternative Modification developed by the Modification Group that will provide an optional variant of the Forward Contract (7-Day) Report to the Energy Contract Volume Notification agent and the Metered Volume reallocation Agent, containing the trades notified by the recipient Notification Agent.

We support the implementation of this Alternative Modification as part of the ELEXON BSC Systems Release 2 Project.

Yours faithfully,
Sarah Grimes
Commercial Manager