

Responses from P92 Draft Report Consultation

Consultation issued 25 July 2002

Representations were received from the following parties:

No	Company	File Number	No. Parties Represented
1.	TXU Europe	P92_MR_001	21
2.	Powergen	P92_MR_002	1
3.	National Grid	P92_MR_003	1
4.	British Gas Trading	P92_MR_004	1
5.	SEEBOARD	P92_MR_005	1
6.	Scottish Power	P92_MR_006	5
7.	British Energy	P92_MR_007	3
8.	Scottish and Southern	P92_MR_008	4
9.	YEDL/NEDL	P92_MR_009	2
10.	LE Group	P92_MR_010	1
11.	Aquila Networks	P92_MR_011	1

P92_MR_001 – TXU Europe

Thank you for the opportunity to comment on the above proposal. The following response is on behalf of all TXU Europe companies.

TXU supports the changes outlined in the P92 draft modification report as they represent a sensible clarification of BSC drafting to reflect current practise.

Yours faithfully

Nicola Roberts
Market Development Analyst
TXU Europe Energy Trading Ltd

P92_MR_002 – Powergen

Powergen Comments on Modification Proposal 92 - Replacement Energy Contract Volume Notifications (ECVNs) and Metered Volume Reallocation Notifications (MVRNs)

Powergen UK plc ('Powergen') welcomes the opportunity to comment on the above consultation document published on 6th March 2002. Powergen provides this response on behalf of itself and the following Parties: Powergen Retail Ltd, Diamond Power Generation Limited and Cottam Development Centre Limited.

Powergen supports the Proposal as we believe that it reflects the original intention and the way that parties are currently working, and that the existing phrasing describes an unworkable arrangement.

Yours Sincerely,

Tim Johnson
Energy Trading
Powergen

P92_MR_003 – National Grid

Response from National Grid

We agree with the proposed changes outlined in the Modification Report P92 - Replacement Energy Contract Volume Notifications (ECVNs) and Metered Volume Reallocation Notifications (MVRNs).

Clare Talbot
National Grid

P92_MR_004 – British Gas Trading

Modification Proposal 92: Replacement Energy Contract Volume Notifications (ECVNAs) and Meter Volume Reallocation Notifications (MVRNAs)

Thank you for the opportunity of responding to this consultation. British Gas Trading Ltd (BGT) support this proposed change to the BSC as better facilitating Applicable BSC Objective d: *promoting efficiency in the implementation and administration of the balancing and settlement arrangements*. The proposal will add clarity to the current drafting and bring it into line with the working interpretation used by industry participants and the ECVAA systems.

Yours faithfully

Danielle Lane
Transportation Analyst

P92_MR_005 – SEEBOARD

With regard to draft modification report dated 25th July on P92 (Replacement Energy Contract Volume Notifications (ECVNs) And Metered Volume Reallocation Notifications (MVRNs)). We agree with recommendations in section 1.1 of this report as it removes possible confusion within BSC.

Dave Morton
SEEBOARD Energy Limited

P92_MR_006 – Scottish Power

P92 Draft Modification Report Comments

With reference to the above, we offer our support to P92: Replacement Energy Contract Volume Notifications (ECVNs) and Metered Volume Reallocation Notifications (MVRNs).

We agree that P92 reflects the actual working practice and removes ambiguity, which has led to a number of queries being raised; thereby better facilitating achievement of the Applicable BSC Objective (d).

We have considered the legal drafting provided and agree that it is appropriate.

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.; Scottish Power Energy Trading Ltd.; Scottish Power Generation Ltd.; Scottish Power Energy Retail Ltd.; SP Transmission Ltd.*

P92_MR_007 – British Energy

British Energy supports this modification proposed by Elexon which is intended to clarify the BSC provision within Section P regarding how changes/corrections to previously notified Energy Contract Volume Notifications (ECVN's) and Metered Volume Reallocation Notifications (MVRN's) can be made. It better achieves the BSC Objectives by reducing the scope for misunderstanding of the BSC, thus promoting efficiency. In our view this clarification simply confirms the position that most parties already take for granted. We feel there may be some benefit in adding to the legal text a comment "for the avoidance of doubt" that those parts of a first notification which are after the end date of an over-writing second notification are effectively "lost".

Rachel Ace

On behalf of

British Energy Power and Energy Trading
British Energy Generation Ltd
Eggborough Power Ltd

P92_MR_008 – Scottish and Southern Energy

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

Further to your note of 25th July 2002, and the associated Modification Report for P92, we agree with the proposed BSC Panel recommendation to the Authority that this Modification Proposal P92 should be made.

If the Modification Proposal P92 is approved, we agree with the proposed BSC Panel recommendation on the timing for the Implementation Date, as outlined in Section 1.1 of the Modification Report.

Regards

Garth Graham
Scottish & Southern Energy plc

P92_MR_009 – YEDL/NEDL

Please note that there is 'No Comment' regarding P92 for both NEDL and YEDL

Sue Calvert
Distribution Change
System Investment

P92_MR_010 – LE Group

P92

LE Group support the recommendation to implement this modification. The clarification of ECVN and MVRN replacement fulfils BSC applicable objective (d) by eliminating the ambiguity that currently exists in BSC section P.

P92_MR_011 – Aquila Networks

Please find that Aquila Networks Plc response to P92 Consultation on draft Modification Report is 'No Comment'.

regards
Rachael Gardener

Deregulation Control Group &
Distribution Support Office
AQUILA NETWORKS