

Responses from P222 Assessment Report Consultation

Consultation Issued on 3 April 2005

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	CE Electric	P222_AR_01	2	0
2.	GTC on behalf of The Electricity Network Company Ltd	P222_AR_02	1	0
3.	TMA	P222_AR_03	0	4
4.	Western Power Distribution	P222_AR_04	2	0
5.	RWE Npower	P222_AR_05	10	0
6.	Central Networks	P222_AR_06	2	0
7.	SAIC Ltd (for and on behalf of ScottishPower)	P222_AR_07	6	0
8.	Scottish and Southern Energy plc	P222_AR_08	9	0
9.	IMSERV	P222_AR_09	0	2
10.	ESP Electricity Limited	P222_AR_10	1	0
11.	Electricity North West Ltd	P222_AR_11	1	0
12.	E.ON UK Energy Services Limited	P222_AR_12	0	1
13.	E.ON	P222_AR_13	4	0
14.	British Energy	P222_AR_14	5	0
15.	Energetics Electricity Ltd	P222_AR_15	1	0
16.	Centrica *	P222_AR_16	9	0

* Late response

P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	<i>Emma Ward</i>
Company Name:	<i>CE Electric</i>
No. of BSC Parties Represented	<i>2</i>
Parties Represented	<i>NEEB YELG</i>
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>Distributors</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	We do not believe the proposed modification would better facilitate the Applicable BSC Objectives; however we do believe it would result in assisting us discharging our statutory obligations.
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	No	We do not believe the alternative modification would better facilitate the Applicable BSC Objectives; however we do believe it would result in assisting us discharging our statutory obligations.
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	No	We do not believe the alternative modification would better facilitate the Applicable BSC Objectives; however we do believe it would result in assisting us discharging our statutory obligations.

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)? Please give rationale	Yes	Yes we support the approach specifically if the alternative proposal is amended to not require DTN activity and the data is provided by a compact disk.
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	We have no further solutions to offer at this time.
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	Yes	Yes, this is our preferred method as cost implications would be reduced.
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	No	We have no further benefits to offer at this time.
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	Either	We would use whichever flow we were provided but we would prefer to use the validated 'new' flow provided on a compact disk.
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	We currently use generic standard profiles and generic consumption data for network analysis. Therefore, more accurate data would allow us more accurately to assess network loads and hence the need for reinforcement. This would assist us in discharging our duty under section 9 of the Electricity Act 1989 (as amended) to develop and maintain an efficient, coordinated and economical system of electricity distribution. We currently use D0030 and D0275 data for DUoS billing.
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	No	We have no further comments or issues to offer at this time.

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 on Thursday 17 April 2008** to modification.consultations@elexon.co.uk and please entitle your email '**P222 Assessment Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	<i>Glenda Simons</i>
Company Name:	<i>GTC on behalf of The Electricity Network Company Ltd</i>
No. of BSC Parties Represented	<i>1</i>
Parties Represented	<i>The Electricity Network Company Ltd</i>
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>Distributor (IDNO)</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	<p>We believe that P222 better facilitate objective (c) <i>Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity;</i></p> <p>We support the minority rationale that it:</p> <ul style="list-style-type: none"> Provides for increased ability for new distributed generation to enter the market, and for small scale generation to compete with larger scale generation. The D0019 information would allow LDSOs to determine the quantities that a generator delivers locally to be netted off against local demand (e.g. in as a regional power zone). This would allow for more cost reflective Distribution Use of System charges which would provide the correct incentives on generators, therefore enhancing competition; and Improved granularity of information that LDSOs have access to will improve the data that ultimately enters Settlement as LDSOs may be able to highlight issues causing erroneous data. Improving the accuracy of data in Settlement benefits all Parties by creating fairer arrangements which, in turn, promote competition. We also believe that the cost and complexity of processing D0010's means that we would effectively duplicate the DC system. This is not efficient or cost effective.
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	Yes	As Question 1.
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	Yes	<p>We believe that BSC objectives (c) and (d) are better facilitated with the Alternative modification.</p> <p>We agree with the report that this is due to the lower overall industry costs of the Alternative Modification improving the efficiency in the implementation and administration of the BSC.</p>

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)? Please give rationale	Yes	
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	Yes	This provision on CD avoids development costs of DTC and DNO systems. The password gives added security if lost in transportation, although it is questionable if any data protection issues exist with the proposed data.
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	Yes	Accurate identification where consumption is used could potentially facilitate improved loss adjustment factors. A significant number of network operators do not use D0010s because of the complexity of processing.
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	Yes	We would use the D0019 information in conjunction with the property type to improve system planning
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	As a new IDNO we currently use ADMD calculations linked to property types to design the networks. The D0019a data will enable us to validate these calculations against actual data to better plan and manage the load requirements. For DUoS billing we use D0030 aggregated data for NHH and D0036 data.
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	Yes	The emergence of IDNO's has been a huge change to industry. Efficient and effective solutions are required to identify energy flows across boundaries. The high costs of boundary metering will ultimately be borne by suppliers/customers and could act as a barrier to competition. The changes to the industry impacts on the industry codes which may not be suitably reflected in relevant code objectives but nevertheless are relevant.

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

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Any queries on the content of the consultation pro-forma should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	<i>Alex Pourcelot</i>
Company Name:	<i>TMA</i>
No. of BSC Parties Represented	
Parties Represented	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>4</i>
Non Parties represented	<i>UDMS NHHDA, LBSL NHHDA, UDMS HHDC and UDMS HHDA</i>
Role of Respondent	<i>NHHDA, HHDA and HHDC</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	There is no clear benefit provided by the Modification to the Applicable BSC objectives as listed in P222AC10.pdf, from the Collated impact assessment responses, most LDSO would not use the D0019 data
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	No	There is no clear benefit provided by the Alternative Modification to the Applicable BSC objectives as listed in P222AC10.pdf
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	No	Please see above.

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)? Please give rationale	Yes	
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	No	This manual process only makes sense if very few LDSO decide to receive this data, that in turn puts the relevance of this modification into question.
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	No	
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	Yes / No	
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	Yes	The burden of responsibility would be moved to the NHHDC or NHHDA agents for the provision of the data with no means for recovery when the benefits to the BSC have not been demonstrated.

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P222 ASSESSMENT PROCEDURE CONSULTATION

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P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	<i>Graham Smith</i>
Company Name:	<i>Western Power Distribution</i>
No. of BSC Parties Represented	<i>2</i>
Parties Represented	<i>Western Power Distribution (South Wales) plc & Western Power Distribution (South West) plc</i>
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>Distributor</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	Objectives C and D. LDSOs need accurate consumption data to manage the network in the most efficient manner. This includes identifying parts of the network where incentives can be offered to embedded generators to defer investment in strengthening the network by encouraging generation. It would be more efficient for us to receive an EAC that has already been calculated than for us to attempt to calculate it ourselves.
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	Yes	As above
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	Yes	The overall lower industry costs means the alternate is our preferred solution.

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)? Please give rationale	Yes	
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	Yes	
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	No	
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	Yes	We would use the consumption data provided instead of the EAC we currently attempt to calculate.
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	Network – a mix of data from Data Collectors, MOPs and Settlements together with our own metering at various parts of the network. DUoS – a mix of data from HHDCs and Settlements.
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	No	

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P222 ASSESSMENT PROCEDURE CONSULTATION

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P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	<i>Andrew Manning</i>
Company Name:	
No. of BSC Parties Represented	
Parties Represented	<i>RWE Trading GmbH, RWE Npower plc, Great Yarmouth Power Ltd, Npower Cogen Trading Ltd, Npower Direct Ltd, Npower Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd</i>
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	
Role of Respondent	<i>Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent</i>
Does this response contain confidential information?	

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	We do not believe any quantifiable benefits have been identified. Any benefits that have been suggested for the Proposed Modification are not relevant to the Applicable BSC Objectives and the limited number of LDSOs that would use this data would erode these.
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	No	We do not believe any quantifiable benefits have been identified. Any benefits that have been suggested for the Alternative Modification are not relevant to the Applicable BSC Objectives and the limited number of LDSOs that would use this data would erode these.
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	No	We do not deem any quantifiable arguments have been identified against the Applicable BSC Objectives for either the Proposed or Alternative Modifications. However, we concur with the view that the Alternative is better than the Proposed as the Alternative contained data that had been subject to validation.

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)? Please give rationale	Yes	Either implementation date would allow sufficient timescale for the necessary changes to NHHDC or NHHDA systems/processes to be made for both the Proposed and Alternative Modifications. However, it should be noted that there is no room for error in the 9 months quoted by our NHHDA to implement the Alternative Modification especially given the possible interaction with DCP0029.
5.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	We do not believe there are any alternative solutions over those already discussed by the Modification Group. The lack of quantifiable arguments against the Applicable BSC Objectives suggests that any solution would be best placed outside of the BSC.
6.	For the Alternative Modification, do you support the data being supplied on a compact disk?	Yes	Providing the data on a password protected CD each quarter would be a lower cost alternative to providing data across the DTN.
7.	Can you identify any BSC related benefits that have not been identified by the Modification Group?	No	
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	Yes / No	
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	Yes	We consider that a process for LDSOs to obtain this data already exists outside of the BSC. Suppliers recovering a reasonable administrative cost from the LDSO to provide bespoke data requirements would ensure the request was a commercial decision.

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Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

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P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	<i>Jane Griffith</i>
Company Name:	<i>Central Networks</i>
No. of BSC Parties Represented	<i>2</i>
Parties Represented	<i>Central Networks East and Central Networks West</i>
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>Distributor</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	This would promote effective competition in the sale of electricity by allowing the DNOs access to more complete information on local area demands and facilitate offering negative UoS tariffs to small scale generation where it can be proved that it has delayed re-inforcement.
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	Yes	This would promote effective competition in the sale of electricity by allowing the DNOs access to more complete information on local area demands and facilitate offering negative UoS tariffs to small scale generation where it can be proved that it has delayed re-inforcement.
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	Yes	This appears to be the more cost effective of the two options.

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)? Please give rationale	Yes	These seem appropriate.
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	Yes	This seems appropriate given the cost saving.
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	No	
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	Yes	This would be used by the tariff team for generation tariffs and by network planners when examining new connections and reinforcement requirements
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	1) D0010 2) D0030 and D0275
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	No	

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P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	Jacqueline McGuire
Company Name:	SAIC Ltd (for and on behalf of ScottishPower)
No. of BSC Parties Represented	6
Parties Represented	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i> ScottishPower Energy Management Ltd, ScottishPower Generation Ltd, ScottishPower Energy Retail Ltd, SP Transmission Ltd, SP Manweb plc, SP Distribution Ltd
No. of Non BSC Parties Represented (e.g. Agents)	0
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i> N/A
Role of Respondent	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributors / other – please state ¹)</i> Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
Does this response contain confidential information?	No

¹ Delete as appropriate – please do not use strikeout, this is to make it easier to analyse the responses

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	<p>Although ScottishPower believes the links that have been made between improved system management, more cost reflective charging and improved competition in distributed generation are very tenuous, it does not entirely reject the idea that these links exist.</p> <p>However, the impact assessment clearly demonstrated that the costs of implementation would greatly outweigh the benefits.</p> <p>Moreover, as this increased cost would be borne by Suppliers, it is more likely that the Proposed Modification would actually serve to inhibit competition in the Supply of electricity.</p>
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	Yes	<p>As with Q1, above, ScottishPower considers the links that have been made between improved system management, more cost reflective charging and improved competition in distributed generation are very tenuous, it does not entirely reject the idea that these links do exist.</p> <p>However, as indicated by the Modification Group, the Alternative Modification is expected to be able to provide the desired benefits at a much lower cost to the industry as a whole. Therefore, ScottishPower believes that the Alternative Modification may be said to better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline.</p>
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	Yes	<p>ScottishPower agrees that the industry as a whole can expect to incur lower overall costs from the implementation of the Alternative Modification than are likely from the Proposed Modification. In particular, the comparative cost impact on Suppliers is likely to be reduced, so not having so detrimental an effect on Supply competition.</p>

Q	Question	Response	Rationale
4.	<p>Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)?</p> <p>Please give rationale</p>	Yes	<p>ScottishPower supports the implementation dates as detailed in Section 3.8 in respect of the Proposed and Alternative Modifications.</p> <p>Although ScottishPower Energy Networks has no plans to utilise the D0019's, were the Proposed Modification to be implemented, their receipt would need to be accommodated. This would necessitate the creation of a new DTN interface and the extension of existing storage capabilities. ScottishPower Energy Networks would require a 9 month lead time to complete the development work prior to the implementation date.</p> <p>If a non-DTC solution were to be implemented, ScottishPower Energy Networks would only require 10 Days notice, <u>provided that it is not obliged to receive the data</u>. However, if a DTC based solution is to be implemented, then this requirement will increase to 9 months.</p> <p>ScottishPower Energy Retail also supports the implementation dates as detailed in Section 3.8 in respect of the Proposed and Alternative Modifications. It will also require a minimum of 9 months to implement the Proposed Modification, but the Alternative Modification could be accommodated in a scheduled release of NHHDA.</p> <p>However, even the Alternative Modification will require business process and documentation changes, so some preparation time, perhaps extending to 1 month, will be needed.</p>

Q	Question	Response	Rationale
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	Yes	<p>In light of recent events in other sectors it makes sense to password protect the disc and also for it to be encrypted.</p> <p>By providing the information on a CD, rather than across the DTN, the overall costs will be reduced. However, given the relatively few LDSOs that have indicated a need for this data, it would seem inappropriate to introduce this in blanket fashion. The process for the NHHDA will involve some manual intervention, so provision of the CD should be limited to only those LDSOs that actually want the data.</p> <p>ScottishPower, therefore, strongly believes that the NHHDA should not be obliged to provide the CD to any LDSO that specifically requests not to receive one. This 'opting out' should remain in place until such time as the LDSO instructs the NHHDA otherwise.</p>
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	No	
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	No	Currently ScottishPower Energy Networks has no plans to utilise the EAC data.

Q	Question	Response	Rationale
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	<p>ScottishPower Energy Networks has its own internal mechanism through which it obtains the data required for planning and managing its networks.</p> <p>For DUoS billing purposes, ScottishPower Energy Networks relies on the D0036 (HH) and D0030 (NHH) data flows that it receives from the HHDC and the SVAA respectively.</p>
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	Yes	<p>ScottishPower has some sympathy with the LDSOs that are seeking access to this data; however, it believes the benefits to be marginal at best, while the costs to the wider industry are unjustified.</p> <p>As highlighted during the P43 discussions, the facility has always existed for the LDSO to engage in a commercial arrangement with the Supplier for this data. Yet, in the wake of the failure of P43, it would appear that no such arrangements were put in place by any Party. Although the proposer asserts that things have changed since then, ScottishPower disagrees; business separation was already in place by 2001, some time before P43 was raised.</p> <p>The assertion that the availability of EAC data will somehow lead to an increase in the uptake of micro-generation is stretching credulity. With around 30 micro-generation sites actually registered in settlements (out of several thousand operating in the UK), it is a weak argument that suggests that the LDSO will be in a position to identify such sites through the EAC and, so, be able to offer more cost reflective DUoS. Of course, it could be argued that the ball is in the Suppliers' court in this case, but it is likely that commercial considerations have prevented wider use of the settlement provision for these sites.</p> <p>Even if such an uptake was to result from the implementation of</p>

Q	Question	Response	Rationale
			<p>one of these solutions - presumably following wide scale use of the P81 provisions - the LDSO would almost certainly then need to engage in system development to manage this more cost reflective charging policy, thus further increasing the costs of these proposals.</p> <p>Given the above, ScottishPower supports neither the Proposed nor Alternative Modification. However, if it were to choose between them, it would prefer the Alternative Modification, which appears to offer a more pragmatic and cost effective approach, provided that the receipt of the data remains optional.</p>

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 on Thursday 17 April 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Assessment Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	Vasu Mistry
Company Name:	Scottish and Southern Energy plc
No. of BSC Parties Represented	9
Parties Represented	SSE Energy Supply Ltd., SSE Generation Ltd., Keadby Generation Ltd., Medway Power Ltd., SSE (Ireland) Ltd., Slough Energy Supplies Ltd., Southern Electric Power Distribution plc., Scottish Hydro Electric Power Distribution plc., SSE Metering Ltd;
No. of Non BSC Parties Represented (e.g. Agents)	0
Non Parties represented	N/A
Role of Respondent	Supplier/Generator/ Trader / Party Agent / Distributor
Does this response contain confidential information?	No

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	We do not believe that this solution would achieve the Applicable BSC Objectives. It is difficult to see how it would facilitate the promotion of effective competition in the generation and supply of electricity, nor does it promote efficiency in the implementation and administration of the balancing and settlement arrangements.
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	No	Although the Alternative solution appears to be a more cost effective, we do not believe that this solution would achieve the Applicable BSC Objectives for the same reasons given in response to Question 1. We believe it could in fact introduce greater risk to Settlements because of the changes required to DA systems.

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	No	No, see response to Question 2.
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)? Please give rationale	Yes	
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	No	Concerns about issues of lost or corrupt disks.
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	No	
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	No	Current plan is not to use D0019 or the new flow as existing processes are fit for purpose.
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	For planning and management of network we use a variety of sources including engineering and power systems tools (e.g., ENMAC) to collect live load data from the distribution network. For DUoS billing we use meter readings and settlement data dependent on the profile class.

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	No	We are not convinced that there is a strong business case justification for the implementation of P222. We believe existing processes are adequate.

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 on Thursday 17 April 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Assessment Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	<i>Stuart Scott</i>
Company Name:	<i>IMSERV</i>
No. of BSC Parties Represented	
Parties Represented	<i>Party Agent – NHHDC/DA</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>2</i>
Non Parties represented	<i>1</i>
Role of Respondent	<i>Party Agent – NHHDC/DA</i>
Does this response contain confidential information?	<i>NO</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	<p>We do not believe that the issue within the market of LDSO not receiving the D0019 information is significant enough to justify the costs and impacts of this change. WE question whether a cost benefit analysis has been completed on this proposal? There only appears to be 50/50 LDSO' support for using this therefore we are assuming that no such analysis has been performed.</p> <p>As a BSC NHHDC/DA agent we are obliged to implement all changes however there is no major benefit to our organisation of this change. In addition we have never received a query from an LDSO requesting EAC/AA information therefore we question the scale of this issue and te need for this change..</p>

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	No	As above
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	No	LDSOs are the only ones to gain from this. Has a cost benefit analysis been completed on this proposal? The costs would be high compared to the gains made in our opinion.
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)? Please give rationale	Yes / No	Neutral
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes	Suppliers pass on D0019 information to LDSOs on a specific request basis.
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	Yes	
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	No	
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	Yes / No	
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	Yes / No	

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 on Thursday 17 April 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Assessment Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	<i>Donna Townsend</i>
Company Name:	<i>ESP Electricity Limited</i>
No. of BSC Parties Represented	<i>One</i>
Parties Represented	<i>ESP Electricity Limited – LAING</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>None</i>
Non Parties represented	<i>n/a</i>
Role of Respondent	<i>Distributor</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	The receipt of D0019s would allow for effective and efficient planning and monitoring of networks in the absence of boundary meter data. This would better facilitate the BSC objective of Condition 3, para 3(c) of ' <i>promoting effective competition in the generation and supply of electricity</i> '. However ESP are aware that the cost impacts for this solution are much greater than the Alternative Modification.
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	Yes	D0010s are not currently processed by ESP as they are considered to hold out of date information. Effective use of D0010s would involve replicating the work of the Data Collector. Therefore, the receipt of non-aggregated EACs (in a new flow) would allow for effective and efficient planning and monitoring of networks. This would better facilitate the BSC objective of Condition 3, para 3(c) of ' <i>promoting effective competition in the generation and supply of electricity</i> '.

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	Yes	Receiving the new flow on a less frequent i.e. quarterly not daily basis, and with only the information that is required, would be ESP's preferred option due to the reduced costs to all involved and would therefore better facilitate the BSC objective of Condition 3, para 3(c) of <i>'promoting effective competition in the generation and supply of electricity'</i> .
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)? Please give rationale	Yes	
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	Yes	We would have no issue with receiving the correctly formatted data on a compact disk.
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	No	
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	-	ESP would prefer to use the new data flow information provided under the Alternative Modification. Please also refer to answer given for question 3 above.
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	ESP currently uses data obtained from boundary meters on each of their networks to plan and manage sites accordingly. For DUoS billing purposes, ESP utilise the incoming D0030 and D0036 data flows (with any associated transactional charges administered under the terms of the DCUSA and relevant SLC4a Charging Statement).

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	No	

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 on Thursday 17 April 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Assessment Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

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P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	<i>Vara Tadi</i>
Company Name:	<i>Electricity North West Ltd</i>
No. of BSC Parties Represented	<i>one</i>
Parties Represented	<i>as above</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>none</i>
Non Parties represented	<i>n/a</i>
Role of Respondent	<i>Distributor</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	Proposed Modification P222 does not meet the applicable BSC objectives as implementation of LDSO's receiving the D0019 will not impact the BSC Objectives.
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	No	As above.
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	No	Neither will achieve the BSC Objectives.

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)? Please give rationale	No	Based on our best understanding of the proposal we believe that the implementation date should be at least 12 months after the Authority decisions have been received.
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes	We see no benefit from changing and advocate continuing with current industry processes of receiving D0010's and D0149/D0150's.
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	No	If the alternate was supported we would prefer an electronic dataflow.
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	No	
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	No	We would not use the D0019, as we currently process the D0010, D0149 and D0150. We intend to continue to use these data flows as they provide us with all the data we need for our customer service functions.
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	For DOUS billing we use D0010's, D0149's and D0150's for the non half hourly market. For the half hourly market we use D275 and D268. To plan and manage our networks we use a combination of metered data measured on the network and data from the various data flows.

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	No	We currently use the D0010 for site specific billing (PC5-8). The data contained within the D0010 flow, including maximum demand and reactive power metered data, enables ENW to deliver accurate and cost reflective distribution Use of System charges to our suppliers' customers which provide clear price signals to use ENW's network efficiently.
		Yes	We actively manage the receipt of D0010 data flows to ensure that the billing of Use of System Charges is based on actual metered data and not estimated data. If P222 is accepted it should not impact any of the current industry data flows and processes. We would not look to process the D0019 flow, as stated previously, as we already receive the data we require and we do not feel that any additional cost is justifiable. For information only, there would be no business benefit in changing our current processes to handle such a flow, the costs of which are considered to be very significant.

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 on Thursday 17 April 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Assessment Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	<i>Alastair Barnsley</i>
Company Name:	<i>E.ON UK ENERGY SERVICES LIMITED</i>
No. of BSC Parties Represented	<i>0</i>
Parties Represented	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>1</i>
Non Parties represented	<i>E.ON UK ENERGY SERVICES LIMITED</i>
Role of Respondent	<i>Party Agent</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	We do not believe that the Speculation about potential benefits has been sufficiently validated
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	No	We do not believe that the Speculation about potential benefits has been sufficiently validated
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	No	We do not believe that the Speculation about potential benefits has been sufficiently validated

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)? Please give rationale	No	We do not believe that this modification should be made
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	Yes	If the alternative solution was approved this would be an appropriate approach
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	No	
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	Yes / No	
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	No	

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

P222 ASSESSMENT PROCEDURE CONSULTATION

Please send your responses by **12:00 on Tuesday 15 April 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Assessment Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	<i>Kate Potts – contact within E.ON Glenn Sheern</i>
Company Name:	<i>E.ON</i>
No. of BSC Parties Represented	<i>4</i>
Parties Represented	<i>Citigen (London) Ltd, Economy Power Ltd, E.ON UK Plc, E.ON Energy Ltd</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>n/a</i>
Non Parties represented	<i>n/a</i>
Role of Respondent	<i>Supplier</i>
Does this response contain confidential information?	<i>no</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	We do not believe that this CP has demonstrated that any of the BSC objectives are better facilitated.
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	No	As above
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	No	Neither the proposed nor the alternate better facilitate the BSC objectives.

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)? Please give rationale	No	We do not believe that this CP should be implemented.
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	We do not believe that this modification should have been raised under the BSC at all.
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	No	We do not support the modification. If however it was approved then a password protected CD would be needed.
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	No	No we do not believe there are any meaningful benefits under the BSC
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	Yes / No	
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	Yes	We believe that the provision of this data just adds cost to the industry that are not justified for the number of LDSOs that would use the information. LDSOs have licence obligations that require them to plan and manage their Networks and they have allowed revenue under the price control review to enable them to do so. This solution merely moves part of this expense of these obligations to the supplier and ultimately the customer with no anticipated reduction in DUoS charges to offset them. It would be more appropriate for those LDSOs that believe this data would be useful for Network planning, or the avoidance of boundary metering between networks, should enter bilateral agreements with suppliers for the provision of this data and the cost is borne by the LDSO.

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 on Thursday 17 April 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Assessment Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS - PROVISION OF EAC AND AA DATA TO DISTRIBUTORS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	<i>Deborah Bird / Martin Mate</i>
Company Name:	<i>British Energy</i>
No. of BSC Parties Represented	<i>5</i>
Parties Represented	British Energy Direct Ltd, British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, Eggborough Power Ltd, British Energy Generation (UK) Ltd
No. of Non BSC Parties Represented (e.g. Agents)	-
Non Parties represented	-
Role of Respondent	<i>Supplier/Generator/Trader/Consolidator/Exemptable Generator/Party Agent</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	<p>With regard to the Applicable BSC Objectives, our response is as follows; A and B – neutral C – We agree with the majority view of the modification group that the proposed modification would not better facilitate objective C. We have seen no evidence to support the minority opinion of the Modification Group.</p> <ul style="list-style-type: none"> The Proposed and Alternative Modifications state that there would be no additional obligations placed on Suppliers to raise data queries. However, there is a possibility that queries by distribution companies could create additional work for Supplier's and Agents. Existing and additional costs would be borne by Suppliers, DCs and/or DAs, while the benefits would fall to distribution companies. There is no obvious benefit to competition between suppliers or their agents. <p>D – No benefit: An increase in the administrative costs of operating the BSC is more likely than a reduction, especially if implementation costs are included.</p>

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	No	Creating a new data flow will not eliminate the concerns expressed in response to question 1
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	No	We are not convinced that the total cost of the alternative would be lower than that of the proposal, and therefore given concerns about cost benefit and cost allocation we do not believe the alternative is better than the proposal or the BSC baseline.
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)? Please give rationale	No	We note the described implementation approach and question how the costs can be justified.
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	The provision of settlement data to distribution companies is not an issue which directly affects settlement or BSC objectives, therefore it is hard to justify proposals under BSC governance.
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	No	Transfer of data by CD is not a particularly secure method. We would expect a suitable level of password protected data encryption to be used.
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	No	Please see our response to question 5.
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	Yes / No	British Energy notes that, from the LDSOs Impact Assessment responses, it is unlikely that this data will be used.

P222 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	Yes	We think it would be better to progress this proposal by alternative routes where cost recovery can be more easily and appropriately targeted. For example, the DCUSA contains provisions for the recovery of costs incurred by suppliers and agents in providing information to DNOs.

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 on Thursday 17 April 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Assessment Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	<i>Morven McPhee</i>
Company Name:	<i>Energetics Electricity Ltd</i>
No. of BSC Parties Represented	
Parties Represented	<i>Energetics Electricity Ltd</i>
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	
Role of Respondent	<i>Distributor (IDNO)</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	By gaining sight of EAC / AA data via the D0019 flow, LDSO's will be able to monitor network activity, plan future developments accordingly, which in turn will lead to more effective use of the systems hence 'promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity'.
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	Yes	See above.
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	Yes	As industry costs are a major factor in any proposed changes, Energetics believe that the Alternative Modification (although it has potentially higher BSCCo costs) better facilitates the applicable BSC objectives than the Proposed Modification.

Q	Question	Response	Rationale
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)? Please give rationale	Yes	
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	Yes	In issuing a CD on a quarterly basis, costs would be significantly reduced, therefore, Energetics supports the data being supplied in this manner.
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	Yes / No	
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	Yes	The use of D0019 flow information would enable us to build up a more accurate picture of how our networks are performing, and would be a useful tool when developing future networks.
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	Energetics uses property types and an associated ADMD to design networks. We use the D0030 flow for NHH DUoS Billing, and the D0036 flow for HH sites.
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	Yes / No	The use of metering at the boundaries between DNOs and IDNOs is seen by Energetics as anti-competitive, as in the long term the cost will be at the expense of end customers. By providing LDSO's with the relevant information, and hence allowing accurate planning of networks, an alternative method of establishing what energy is being used across the boundaries may be considered, as there would be adequate data to support consumption at the boundary.

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P222 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	<i>Mitch Donnelly</i>
Company Name:	<i>Centrica</i>
No. of BSC Parties Represented	<i>9</i>
Parties Represented	<i>Accord Energy Ltd; British Gas Trading Ltd; Centrica Barry Ltd; Centrica Brigg Ltd; Centrica KL Ltd; Centrica KPS Ltd; Centrica PB Ltd; Centrica RPS Ltd; Centrica SHB Ltd</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>0</i>
Non Parties represented	<i>n/a</i>
Role of Respondent	<i>Supplier/Generator/ Trader</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	<p>The BSC does not and should not concern itself with the network planning requirements of DSOs therefore this modification does not relate in any way to the BSC objectives.</p> <p>In fact this modification runs contrary to the objectives as it increases the administrative burden associated with the balancing and settlement arrangements. Furthermore, by placing additional obligations upon BSC Parties and their agents this modification increases their contractual risk position and so could be regarded as inhibiting competition in the supply and sale of electricity.</p>

Q	Question	Response	Rationale
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	No	For the reasons stated above
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	No	<p>This proposal is preferable to the original in that it results in reduced system impacts and if the costs of development are targeted at the DSOs that require the information then Parties are protected from some exposure to costs.</p> <p>However, for the reasons stated in Q1, this modification in now way can be related to the BSC objectives and does not facilitate their achievement in any way.</p>
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)? Please give rationale	Yes	Although we do not support the implementation of either modification, we are happy that the proposed time scales would meet Party and Party Agents requirements were this proposal to be implemented.
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes	As all DSOs currently receive D0010 data from the DC, D0149/D0150 from the MOP and SSC/MTC/PC/LLFC are held on their MPAS systems, we believe that for the DSOs who may have a requirement for EAC data they would be able to derive this themselves, certainly to a degree of accuracy that would more than adequately meet their planning requirements, thus ensuring that only DSOs that require the data receive it and that costs are not unnecessarily imposed on any party.
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	Yes with Qualifications	We have no concerns with reagrds to Data Protection Issues as under either proposal the data would not contain personal customer information, however costs of this would need to be met by the DSO requiring the data.

Q	Question	Response	Rationale
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	No	We are not aware of any BSC related benefits either identified in this proposal or otherwise.
8.	LDSOs Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative? Please give rationale	Yes / No	
9.	LDSOs What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make?? Please give rationale	No	No

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 on Thursday 17 April 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Assessment Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

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