

## P222 Report Phase Consultation Responses

Consultation Issued on 15 may 2008

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	Total Gas & Power Limited	P222_dMR_01	1	0
2.	Centrica	P222_dMR_02	9	0
3.	CE Electric	P222_dMR_03	2	0
4.	Central Networks	P222_dMR_04	2	2
5.	The Electricity Network Company	P222_dMR_05	1	0
6.	TMA	P222_dMR_06	0	4
7.	Scottish and Southern Energy plc	P222_dMR_07	9	0
8.	Siemens Energy Services	P222_dMR_08	0	6
9.	Western Power Distribution	P222_dMR_09	2	0
10.	Scottish Power	P222_dMR_10	6	0
11.	Electricity North West Ltd	P222_dMR_11	1	0
12.	AccuRead Ltd	P222_dMR_12	0	1
13.	British Energy	P222_dMR_13	5	0
14.	RWE npower	P222_dMR_14	10	0
15.	E.ON UK	P222_dMR_15	4	0
16.	IMServ Europe	P222_dMR_16	0	1



## P222 REPORT PHASE 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.

<b>Respondent:</b>	<i>Name: Laura Ayling</i>
<b>Company Name:</b>	Total Gas & Power Limited
<b>No. of BSC Parties Represented</b>	1
<b>Parties Represented</b>	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
<b>No. of Non BSC Parties Represented</b>	0
<b>Non Parties represented</b>	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
<b>Role of Respondent</b>	<i>Supplier</i>
<b>Does this response contain confidential information?</b>	<i>N/A</i>

<b>Q</b>	<b>Question</b>	<b>Response <sup>1</sup></b>	<b>Rationale</b>
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	Yes / No	N/A
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made? Please give rationale.	Yes / No	N/A

Q	Question	Response <sup>1</sup>	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Dates for P222? Please give rationale.	Yes	No change for supplier
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group? Please give rationale.	Yes / No	N/A
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?	Yes / No	N/A
6.	Are there any further comments on P222 that you wish to make?	Yes / No	What is the impact / benefit to the customer through implementing this change – has a benefits quantification exercise taken place to support the change? Will the cost for the exception management be passed onto the Supplier? The consumer has already experienced increased energy charges so how will this be justified by passing through to the customer? Overall what is the benefit to Industry participants for this change?

Please send your responses by **17:00 on Friday 30 May 2008** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email '**P222 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Panel.

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](mailto:chris.stewart@elexon.co.uk).

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<b>Respondent:</b>	<i>Mitch Donnelly</i>
<b>Company Name:</b>	Centrica
<b>No. of BSC Parties Represented</b>	9
<b>Parties Represented</b>	<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>
<b>No. of Non BSC Parties Represented</b>	0
<b>Non Parties represented</b>	<i>n/a</i>
<b>Role of Respondent</b>	<i>Supplier/Generator/ Trader</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

Q	Question	Response <sup>1</sup>	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	Yes	We agree that this modification proposal in no way facilitates the BSC objectives, that the perceived benefits to LDSOs have been eroded as it has become apparent that not all LDSOs would use the data if it were available to them and we support the view that by increasing contractual obligations and so risk to BSC signatories this modification is detrimental to the BSC objectives.
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made? Please give rationale.	No	This modification does not facilitate the BSC objectives any more than does the original proposal, therefore we do not support the panel's recommendation.

Q	Question	Response <sup>1</sup>	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Dates for P222? Please give rationale.	n/a	
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group? Please give rationale.	n/a	
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?	No	<p>A very small percentage of the total EAC data generated each day is required by a small number of LDSOs, who are able to derive the data for themselves, but do not wish to incur the costs of doing so.</p> <p>The effect of either of these proposals would be to oblige the whole market to make system changes to accommodate this and to socialise the costs associated with these changes. Resulting in deterioration in the accuracy of cost targeting across the market and an increased level of contractual risk.</p> <p>There are no benefits to the BSC or any cost savings that would occur as a result of implementation of either proposal.</p>

Q	Question	Response <sup>1</sup>	Rationale
6.	Are there any further comments on P222 that you wish to make?	Yes	<p>In the Draft Modification Report the panel appear to have rejected the original proposal as it does not support relevant objectives, however they then go on to state in support of the alternate that increased LDSO competition leads to increased supply and generation competition. The outcome of both of these modification proposals, in terms of LDSO competition, would be the same and so we do not agree that this argument can be made for the alternate and not the original proposal.</p> <p>Furthermore, we do not agree with the assertion that increased LDSO competition facilitates Supply and Generation competition. We agree that these proposals may improve the accuracy of DUoS charging, and that increased LDSO competition may act to reduce overall distribution costs, this in no way impacts on competition between Suppliers or Generators as we are in effect moving from one 'level playing field' to another 'level playing field'. As such, neither of these proposals better facilitate the relevant BSC objectives.</p> <p>Finally, we do not believe that sufficient regard has been given to alternative solutions available to the LDSOs that do require this data. Under the current arrangements LDSOs have access to data which would allow them to calculate the EAC value themselves without the requirement for a BSC change. This would ensure that the costs are accurately targeted to those who will receive the benefit.</p>

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## P222 REPORT PHASE CONSULTATION QUESTIONS

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

Q	Question	Response <sup>1</sup>	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	Yes	When comparing the Proposed Modification against the Alternative Modification the Alternative is less costly, results in minimal impact and would assist with our network load monitoring processes.
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made? Please give rationale.	Yes	When comparing the Proposed Modification against the Alternative Modification the Alternative is less costly, results in minimal impact and would assist with our network load monitoring processes.



Q	Question	Response <sup>1</sup>	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Dates for P222? Please give rationale.	Yes	Implementation of nine to twelve months is acceptable.
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group? Please give rationale.	Yes	The legal text should ensure that LDSO requests are dealt with by suppliers, the only observation is that there is no timescales to adhere to. We therefore suggest that timescales for provision are included in the legal text. Additionally it does not make it clear whether one request would result in this data being provided every quarter or if the data has to be requested on every occasion.

Q	Question	Response <sup>1</sup>	Rationale
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?	Yes	<p>The proposal is beneficial by assisting us discharging our statutory obligations by allowing proactive network load assessment.</p> <p>Distributors have a legal duty to develop and maintain an efficient, coordinated and economical system of electricity transmission. To enable distributors to discharge this duty it is vital that they have information on where and how much load is being taken from the distribution network.</p> <p>For LV underground circuits most distributors have load monitoring equipment at the source substations that provides information on the load being supplied from the circuit. However, it does not provide information on where on the circuit this load is being taken.</p> <p>The vast majority of customers connected to such circuits are non-half-hourly (nhh) metered customers and metering information from these customers provides the bulk of the site specific information available. This information, coupled with distributors' connectivity models, provides the picture of where and how much load is being taken from individual LV circuits. This then enables distributors to calculate voltage conditions on the circuit (to ensure ESQCR voltage limits are being met) and loading (to ensure circuits remain "fit for purpose"). Without such monitoring distributors can only operate with a reactive response to poor voltage and reliability issues caused by excessive loading, i.e. wait until customers are experiencing poor service and complain about it before doing anything.</p> <p>Currently the "raw" meter readings from nhh customers are available to distributors through the D10 data flows. However, these have proved to be extremely unreliable as a means of calculating AAs or EACs due to the usual problems of incorrect readings and, on multiple register metering installations, transposed readings. Settlements class AAs or EACs should provide a much more accurate and stable source of site specific loading than the D10s.</p> <p>At present we are unable to quantify these.</p>
6.	Are there any further comments on P222 that you wish to make?	No	

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<b>Respondent:</b>	<i>Jane Griffith</i>
<b>Company Name:</b>	Central Networks
<b>No. of BSC Parties Represented</b>	2
<b>Parties Represented</b>	<i>EMEB and MIDE distributors</i>
<b>No. of Non BSC Parties Represented</b>	2
<b>Non Parties represented</b>	0
<b>Role of Respondent</b>	<i>Distributor</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

Q	Question	Response <sup>1</sup>	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	Yes	This proposal did not allow DNOs to opt out if they were not interested in receiving the data, enforcing costs on suppliers via the DTN and distributors to change their systems for no perceived gain.
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made? Please give rationale.	Yes	The information contained in the report will allow distributors access to the most complete and recent actual and estimated consumptions on an individual customer level as used by suppliers for billing purposes, a data set that the D0010 / D0149 / D0150 flows currently available fail to provide. This will have many uses for our planning engineers, revenue protection, and for future DG tariff structures involving locational signals.

Q	Question	Response <sup>1</sup>	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Dates for P222? Please give rationale.	Yes	
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group? Please give rationale.	Yes	
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?	Yes	<p>We would use the details from the D0019 flow to check the units that have been put into settlement against the estimated unrecorded usage data provided from Revenue Protection services to suppliers via the D0239.</p> <p>We would also find the information useful in the registration investigation team as this flow is used towards the end of the registration process and will be a good indicator of registration success.</p>
6.	Are there any further comments on P222 that you wish to make?	Yes	<p>It is difficult to name and quantify all of the benefits of this data as DNOs to date have not had access to it. We feel that this data will improve the accuracy of settlements and that it will enable many positive actions in terms of localised LV charging structures at a time when DCPR5 is looking to encourage innovative networks and active network management over the typical reinforcement plans.</p>

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<b>Respondent:</b>	<b>Glenda Simons</b>
<b>Company Name:</b>	<b>The Electricity Network Company</b>
<b>No. of BSC Parties Represented</b>	<b>1</b>
<b>Parties Represented</b>	<b>The Electricity Network Company</b>
<b>No. of Non BSC Parties Represented</b>	
<b>Non Parties represented</b>	<b>Not Relevant</b>
<b>Role of Respondent</b>	<b>Distributor</b>
<b>Does this response contain confidential information?</b>	<b>NO</b>

<b>Q</b>	<b>Question</b>	<b>Response <sup>1</sup></b>	<b>Rationale</b>
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	<b>Yes</b>	The purpose of the Proposed Modification is to establish an efficient and economic mechanism for the provision of consumption data to LDSOs. Whilst The Proposed solution does this we believe the Alternative Modification P222 is a more economic option in respect of implementation costs and in the ongoing operation.
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made? Please give rationale.	<b>Yes</b>	LDSOs need to understand the consumption taken by customers connected to their distribution networks. This information plays an important part in understanding the usage and loading of the distribution system and therefore assists in the economic and efficient operation of the distribution system.  We believe that Alternative Modification P222 is more economic and efficient than Proposed Modification P222 in that it requires fewer system changes by individual parties yet still provides data in a relevant form for LDSOs.
3.	Do you agree with the Panel's provisional	<b>Yes</b>	Whilst the timescales are longer than we would like we recognise that

Q	Question	Response <sup>1</sup>	Rationale
	recommendation concerning the Implementation Dates for P222? Please give rationale.		development work, testing and implementation is required. Therefore we believe 9 months is not unreasonable.
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group? Please give rationale.	<b>Yes</b>	No comment.
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?	<b>Yes</b>	<p>In managing our distribution systems we need already to identify where MPANs connect to our network. This is required for regulatory reporting of customer minutes lost for example. Consumption data can be maintained in a field(s) associated with MPAN entity. This would be required even if P222 was not implemented. However, if P222 was not implemented we would need to develop a separate system to process meter reading data. Whilst we have not prepared detailed specifications for this or gone out to formal tender, indications are that the application software would cost c.£100,000 to develop.</p> <p>Additionally, a separate resource would be required to validate or process data that was believed to be erroneous (either as a consequence of incorrect or missing meter readings or as a consequence of incorrect meter technical details being held. As a fledgling LDSO these resource costs would be low due to the low number of metering points. However, if we assume that for 100,000 metering points there are metering reading queries with 2% of these. This would result in 2,000 queries having to be raised. Over a year this would equate to 10 queries a day (assuming 200 working days per year). This would have resource implications for the LDSO and for the relevant agent.</p>
6.	Are there any further comments on P222 that you wish to make?	<b>Yes</b>	We recognise the importance of undertaking cost benefit analysis. However, for proposals such as this it is relatively straight forward to identify costs of implementing solutions since these essentially relate to system changes and are relatively tangible. However, it is much more difficult to identify the benefits that will result from consumption data for premises being much more easily available to distributors. We believe that having information will, at least in part, contribute to facilitating competition in distributed generation. Consumption

Q	Question	Response <sup>1</sup>	Rationale
			<p>(demand) data will be more readily aggregated by network zone. This will assist in identifying areas where small sized generation can offset upstream reinforcement. At present such concepts are still new, but if the carbon agenda is to be met in the future, a much greater reliance on this type of network management will be required with generators sharing in benefits from deferred reinforcement.</p> <p>Under current arrangements, in order to determine consumption data, LDSOs must have systems that can process D0010 meter reading data and the relevant meter technical details for a metering point in order to determine consumption data. In essence the LDSO is required to replicate the functionality of the NHHDC system and duplicate the processing of this data.</p> <p>We cannot understand any logic that purports that duplicating the systems and processing of meter reading data (once by suppliers and once by distributors) is a more efficient solution than processing the data once and sharing the relevant outputs with distributors.</p> <p>The Alternative Modification P222 means that LDSOs will, if they choose, receive consumption data (EACs) 4 times a year. This level of granularity provides LDSOs with sufficient information to enable them to plan and operate their distribution system. Proposed Modification P222 provides a level of accuracy and detail not required for managing and operating the distribution system.</p> <p>We acknowledge that some LDSOs have indicated that they would not use this information. This is because they identify that they already have systems in place. We recognise that this is because some LDSOs bill for use of system on a site specific basis. In addition, LDSOs that are part of a larger corporate group (with supplier and NHHDC affiliates) may be in a position to benefit from software applications developed at the corporate level for affiliates processing this type of information. Therefore the cost arguments for such LDSOs may not be the same as it is for those LDSOs who do not have any affiliate supply or agency businesses, or if they do, do not develop systems at a corporate level.</p>

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<b>Respondent:</b>	<i>Alex Pourcelot</i>
<b>Company Name:</b>	TMA
<b>No. of BSC Parties Represented</b>	0
<b>Parties Represented</b>	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
<b>No. of Non BSC Parties Represented</b>	4
<b>Non Parties represented</b>	<i>UDMS HHDC, UDMS HHDA, UDMS NHHDA and LBSL NHHDA</i>
<b>Role of Respondent</b>	Party Agent
<b>Does this response contain confidential information?</b>	<i>No</i>

Q	Question	Response <sup>1</sup>	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	Yes	As previously stated 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 agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made? Please give rationale.	No	There is still no clear benefit provided by the Alternative Modification to the Applicable BSC objectives as listed in P222AC10.pdf and the cost of this change is high, therefore from a cost/benefit stand point, there is no justification for going ahead with the Alternative proposal. Also, the support from LDSO and IDNO for the Modification or its proposal is low, when they are the very parties that would most benefit from it, adding further justification for not pursuing this alternative proposal.



Q	Question	Response <sup>1</sup>	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Dates for P222? Please give rationale.	No	Lead-time of 12 months between an Authority's decision and the implementation date would be required.
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group? Please give rationale.	Yes	
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?	No	
6.	Are there any further comments on P222 that you wish to make?	Yes	The existing arrangements provide the information necessary for LDSO to be able to monitor their network performance and plan future activity, however if some LDSO and IDNO, based on a commercial decision, would like to receive the information contained in the D0019 flow, they are free to seek bilateral agreements with Suppliers or party agents to receive the information.

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<b>Respondent:</b>	Vasu Mistry
<b>Company Name:</b>	Scottish and Southern Energy plc
<b>No. of BSC Parties Represented</b>	9
<b>Parties Represented</b>	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;
<b>No. of Non BSC Parties Represented</b>	0
<b>Non Parties represented</b>	N/A
<b>Role of Respondent</b>	Supplier/Generator/ Trader / Party Agent / Distributor
<b>Does this response contain confidential information?</b>	No

Q	Question	Response <sup>1</sup>	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	Yes	We do not believe that this solution would achieve the Applicable BSC Objectives. We agree that a case has not been made how the proposed modification would facilitate the promotion of effective competition in the generation and supply of electricity. Furthermore, we do not believe it promotes efficiency in the implementation and administration of the balancing and settlement arrangements.
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made? Please give rationale.	No	Although the Alternative solution appears to be relatively more cost effective, we do not believe that this alternative modification would achieve the Applicable BSC Objectives for the same reasons given in response to Question 1. We are not convinced that there is a strong business case justification for the implementation of P222. We believe existing processes are adequate for the LDSOs.

Q	Question	Response <sup>1</sup>	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Dates for P222? Please give rationale.	Yes	Yes for the Alternative Modification, however, for the Proposed Modification we would prefer the November 2009 release.
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group? Please give rationale.	Yes	But noting our response to Q2.
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?	No	We do not see any benefits or cost savings.
6.	Are there any further comments on P222 that you wish to make?	Yes / No	We are disappointed that the industry views were not taken into account on rejecting P222 altogether.

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<b>Respondent:</b>	<i>Lisa Smith</i>
<b>Company Name:</b>	Siemens Energy Services
<b>No. of BSC Parties Represented</b>	0
<b>Parties Represented</b>	
<b>No. of Non BSC Parties Represented</b>	6
<b>Non Parties represented</b>	NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO
<b>Role of Respondent</b>	<i>Party Agent</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

<b>Q</b>	<b>Question</b>	<b>Response <sup>1</sup></b>	<b>Rationale</b>
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	Yes	We do not support P222 and do not see how it would better facilitate any of the Applicable BSC Objectives. Only some of the LDSOs who have responded to this Proposal have indicated that they would use this information, therefore it would be difficult to justify the high costs for making this change when few parties are going to benefit.

Q	Question	Response <sup>1</sup>	Rationale
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made? Please give rationale.	No	<p>Although we recognise that the overall costs of this Alternative Modification are lower than for the Proposed Modification, Siemens Energy Services still oppose this Alternative Modification for the same reasons as P222. Also, we do not understand why the recommendation is that the Alternative MP SHOULD be made, when only 1 member of the Modification Group supported it against the baseline.</p> <p>We do not support use of a password protected CD to provide this data as we do not believe this is an improvement on sending the flow over the DTN, given the increased admin for staff involved in burning CDs and sending them out by post.</p> <p>As a general principle, if a data extract is going to be provided on a regular basis, then we should be looking at some form of automated delivery. We would prefer that if this Alternative Proposal is progressed, then the method of delivery should not be mandated, and that the option of delivery over the DTN is retained. Also, an alternative option would be to provide the files via an FTP site.</p>
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Dates for P222? Please give rationale.	Yes	No objections to proposed dates
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group? Please give rationale.	Yes	Yes, but there will need to be additional changes to BSCP 504 or BSCP 505. Would this be picked up via a separate CP(s)?
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?	No	We have not identified any additional BSC benefits or cost savings, this Modification will only add extra cost to us.
6.	Are there any further comments on P222 that you wish to make?	No	

## P222 REPORT PHASE 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.

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

<b>Q</b>	<b>Question</b>	<b>Response <sup>1</sup></b>	<b>Rationale</b>
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	Yes	Copies of the D0019s would be a useful addition to the data received by LDSO but the volume of flows and the cost of providing them in the manner proposed would be excessive, given that a cheaper and more accurate alternate modification is available.

Q	Question	Response <sup>1</sup>	Rationale
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made? Please give rationale.	Yes	This proposal will greatly improve the LDSO's visibility of consumption at meter point level. Under the current BSC process, although this data can be derived from other flows received the processing cost is excessive and the results can be unreliable. The improved quality of information will enable the LDSO to make better informed decisions when assessing the need for network reinforcement and, in particular, will provide greater granularity when assessing the benefit that would be gained by the connection of small embedded generators. In turn, this will increase the likelihood that we will be able to offer incentives to encourage embedded generation, thus meeting applicable objective (c) "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"
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Dates for P222? Please give rationale.	Yes	
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group? Please give rationale.	Yes	

Q	Question	Response <sup>1</sup>	Rationale
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?	No	<p>Unfortunately it is not possible for us to state categorically that by having better visibility of the consumption at MSID level we will be able to avoid £X of investment in the network. We are also unable to claim with absolute certainty that it will encourage a defined number of embedded generators to connect. However it is more likely that these benefits will be realised than it will be if we do not have this data.</p> <p>As stated at the modification group and during the assessment process, we currently attempt to calculate an equivalent to the EAC by processing meter readings against meter technical details. This process is crude in comparison to the processes undertaken by data collectors, in part due to the fact that we have no process to deal with discrepancies in the data we receive or to take follow up action in cases where data is not received at all. Were we to introduce such processes in order to improve the data quality, we estimate the additional cost to us, Suppliers and Agents dealing with queries could exceed £100,000. It is likely that this query process would often simply duplicate the processes already undertaken by Suppliers and Agents when they correct errors so that data is suitable for Customer billing and for Settlements.</p> <p>We consider that the Alternative Modification P222 provides a good opportunity for the industry to benefit, by increasing the likelihood that embedded generation will connect and potentially reducing unnecessary network strengthening , at a relatively low cost.</p>
6.	Are there any further comments on P222 that you wish to make?	No	

Please send your responses by **17:00 on Friday 30 May 2008** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email '**P222 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Panel.

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](mailto:chris.stewart@elexon.co.uk).



## P222 REPORT PHASE 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.

<b>Respondent:</b>	<i>Name</i>
<b>Company Name:</b>	Scottish Power
<b>No. of BSC Parties Represented</b>	6
<b>Parties Represented</b>	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
<b>No. of Non BSC Parties Represented</b>	
<b>Non Parties represented</b>	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
<b>Role of Respondent</b>	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributor / other – please state <sup>1</sup>)</i>
<b>Does this response contain confidential information?</b>	

Q	Question	Response <sup>1</sup>	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	Yes	<p>In line with the unanimous view of the Modification Group, ScottishPower does not believe that Proposed Modification P222 would better facilitate the applicable BSC Objectives.</p> <p>It was clear from the responses during the Assessment Consultation that the costs to implement P222 would be prohibitively high in the face of very limited anticipated benefit.</p>

<sup>1</sup> Delete as appropriate – please do not use strikethrough, this is to make it easier to analyse the responses

Q	Question	Response <sup>1</sup>	Rationale
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made? Please give rationale.	<b>No</b>	<p>In line with the near unanimous view of the Modification Group, ScottishPower does not believe that the Alternative P222 would better facilitate the applicable BSC Objectives as it appears from the consultation responses that the costs of P222 Alternative far outweigh the anticipated benefits.</p> <p>Although ScottishPower does, to some extent, accept the argument that competition in generation could be facilitated by wider availability of this demand information, it also accepts that it could equally be argued that the resultant additional cost to Suppliers could act as a barrier to entry.</p> <p>Therefore, ScottishPower would prefer that the Panel revise its decision in line with VASMG advice, before making its recommendation to the Authority in respect of P222 Alternative.</p>
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Dates for P222? Please give rationale.	<b>Yes</b>	ScottishPower is of the view that the implementation dates proposed should offer a reasonable window for Distributors and NHHDA's to make the necessary arrangements and to rollout system changes.
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group? Please give rationale.	<b>Yes</b>	The legal text appears to deliver the agreed solutions.
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?	<b>No</b>	ScottishPower is not aware of any further BSC benefits that would arise from these proposals. Moreover, given that the VASMG was unable to uncover sufficient benefits, in its view, to warrant implementation, ScottishPower would urge the Panel to revise its provisional recommendation and to instead recommend that the Authority reject both Proposed and Alternative Modifications.

Q	Question	Response <sup>1</sup>	Rationale
6.	Are there any further comments on P222 that you wish to make?	Yes	<p>The role of the Standing Modification Group is clear; a group of independent experts, they provide analysis of the pros and cons of Modification Proposals. Where applicable, the Group may develop Alternative Modification Proposals, usually to address perceived deficiencies in the original proposals with which they have been presented. This expert analysis takes shape over a number of meetings over several months, before the group forms its recommendations.</p> <p>Sometimes, perhaps when the costs and benefits are more ambiguous, the Modification Group will be split as to whether to recommend implementation or rejection. In this case, however, the costs were not ambiguous and the Modification Group was not split; in fact it was unanimous in its rejection of P222 and almost unanimous in its rejection of the P222 Alternative.</p> <p>ScottishPower is, therefore, very disappointed to find that the Draft Modification Report comes with anything other than a provisional recommendation to reject the proposals.</p>

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## P222 REPORT PHASE 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.

<b>Respondent:</b>	<i>Vara Tadi</i>
<b>Company Name:</b>	Electricity North West Ltd
<b>No. of BSC Parties Represented</b>	One
<b>Parties Represented</b>	<i>norwebd</i>
<b>No. of Non BSC Parties Represented</b>	none
<b>Non Parties represented</b>	N/A
<b>Role of Respondent</b>	<i>Distributor</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

Q	Question	Response <sup>1</sup>	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	Yes	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 agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made? Please give rationale.	Yes	

Q	Question	Response <sup>1</sup>	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Dates for P222? Please give rationale.	Yes	
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group? Please give rationale.	Yes	We would have found it useful to be able to review the changes to the Code subsidiary documents at the same time
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?	No	
6.	Are there any further comments on P222 that you wish to make?	No	

Please send your responses by **17:00 on Friday 30 May 2008** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email '**P222 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Panel.

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## P222 REPORT PHASE 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.

<b>Respondent:</b>	<i>Seth Chapman</i>
<b>Company Name:</b>	AccuRead Ltd
<b>No. of BSC Parties Represented</b>	
<b>Parties Represented</b>	
<b>No. of Non BSC Parties Represented</b>	1
<b>Non Parties represented</b>	<i>AccuRead</i>
<b>Role of Respondent</b>	<i>Party Agent (NHHDC/NHHDA/NHHMO)</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

<b>Q</b>	<b>Question</b>	<b>Response <sup>1</sup></b>	<b>Rationale</b>
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	Yes	
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made? Please give rationale.	Yes	If this information is required by Distributors this would be an efficient way of providing it.

Q	Question	Response <sup>1</sup>	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Dates for P222? Please give rationale.		The recommended implementations are acceptable to AccuRead as an NHHDA as long as the Alternative Modification is approved and is implemented as a change to the Elexon supported NHHDA software.
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group? Please give rationale.		
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?		
6.	Are there any further comments on P222 that you wish to make?	Yes	AccuRead believed that it is inappropriate to specify in the Alternate Modification that the new data flow be sent on a CD. Although we agree that it is not necessary to send this flow over the DTN other secure means could be used to transfer these data flow eg secure FTP or encrypted email, the option to use these alternate methods of communication should be allowed.

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## P222 REPORT PHASE 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.

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

Q	Question	Response	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	Yes	<p>We agree that the Proposed Modification P222 should not be made, because it does not better facilitate the BSC objectives. Referring to Objectives:</p> <p>(a) no effect on ability of Transmission Licensees to fulfil their licence objectives.</p> <p>(b) no effect on efficient, economic and co-ordinated operation by the Transmission Company of the Transmission System.</p> <p>(c) since it does not improve the accuracy or efficiency of allocation of electricity costs or benefits between trading parties, there are no obvious benefits for competition in generation and supply and the purchase and sale of electricity.</p> <p>(d) Since there would be central costs in implementing and operating the proposal with no corresponding savings, it cannot better meet objective (d).</p>



Q	Question	Response	Rationale
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made? Please give rationale.	No	We are concerned that the Panel disregarded the advice of the Modification Working Group and disagree that the Alternative Proposed Modification P222 should be made, because it does not better facilitate the BSC objectives for the same reasons as given above for the proposal itself.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Dates for P222?	Yes / No	We are of the opinion that P222 should not be implemented.
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group?	Yes	
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?	Yes / No	As previously stated, there are no BSC benefits to either the Proposed or Alternative Modification. Given concerns about cost benefit and cost allocation, and the fact that the estimated central costs for the Alternative Modification are higher than the Proposed Modification, the alternative is worse than the proposal in relation to meeting BSC Objective D.
6.	Are there any further comments on P222 that you wish to make?	Yes	<p>Throughout the modification process, the benefits of this change have consistently failed to be shown.</p> <p>The Alternative Modification proposes the sending of a new flow which will not be sent across the DTN but via a password protected CD. This is unreliable and, as previously noted from the LDSO Impact Assessment responses, it is unlikely that this data will be used.</p> <p>P222 should not be drawing parallels with P216. P216 will provide rigour and visibility to a process used to determine a fundamental input to the settlement process. For P222, distribution companies already receive the raw input information via the D0010 flow but choose not to use it.</p>

Please send your responses by **17:00 on Friday 30 May 2008** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email '**P222 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Panel.

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## P222 REPORT PHASE 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.

<b>Respondent:</b>	<i>Andrew Manning</i>
<b>Company Name:</b>	
<b>No. of BSC Parties Represented</b>	
<b>Parties Represented</b>	<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>
<b>No. of Non BSC Parties Represented</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party</i>
<b>Does this response contain confidential information?</b>	

<b>Q</b>	<b>Question</b>	<b>Response <sup>1</sup></b>	<b>Rationale</b>
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	Yes	We do not believe the Proposed Modification is consistent with any of the BSC objectives.

Q	Question	Response <sup>1</sup>	Rationale
2.	<p>Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made?</p> <p>Please give rationale.</p>	No	<p>We do not believe the Alternative Modification is consistent with any of the BSC objectives and wish to highlight the following points:</p> <ul style="list-style-type: none"> <li>• The Modification Group considered whether the Alternative Modification facilitated competition in Generation and could find no tangible evidence to support this.</li> <li>• Based on the assessment consultation responses the majority did not agree that the Alternative would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline.</li> <li>• The data is already available to LDSOs through the D0010 'Meter Readings' data flow. The Modification Group were unable to establish that the new data set would be superior to the D0010 data. So, even if any benefits to the BSC could be proven, the contribution to these benefits by the new data set would be marginal and could be realised without this change.</li> <li>• In the main, only IDNOs would make use of the new data set. It is highly unlikely that significant volumes of Distributed Generation will connect to IDNO networks, so any perceived benefits will be significantly diluted.</li> <li>• We believe that the rationale for the Panel recommending rejection of P043 is also applicable to Alternative Modification P222, "In particular, the Panel agreed with the views of the Modification Group that the Modification Proposal could possibly lead to reduced distribution costs but there was no strong evidence to support this. The Panel also agreed that even if there were reduced distribution costs they would not necessarily lead to lower Distribution Use of System charges and that it was unclear as to whether the Modification Proposal would better facilitate achievement of the Applicable BSC Objectives."</li> </ul>

Q	Question	Response <sup>1</sup>	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Dates for P222? Please give rationale.	Yes	Changes to HHDA systems and processes will be achievable within the Implementation dates, however this will divert resource from other projects.
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group? Please give rationale.	Yes	
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?	Yes	We do not believe any tangible evidence of benefits or cost savings against the Applicable BSC Objectives have been provided by the Modification Group or the Panel. This is not because the Modification Group overlooked any benefits or cost savings, but because no benefits or cost savings exist.
6.	Are there any further comments on P222 that you wish to make?	No	

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## P222 REPORT PHASE 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.

<b>Respondent:</b>	<i>Name Glenn Sheern</i>
<b>Company Name:</b>	E.ON UK
<b>No. of BSC Parties Represented</b>	
<b>Parties Represented</b>	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
<b>No. of Non BSC Parties Represented</b>	
<b>Non Parties represented</b>	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
<b>Role of Respondent</b>	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributor / other – please state<sup>1</sup>)</i> Supplier
<b>Does this response contain confidential information?</b>	<i>No</i>

Q	Question	Response <sup>1</sup>	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	Yes	This modification clearly does not better facilitate any of the BSC objectives.

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

Q	Question	Response <sup>1</sup>	Rationale
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made? Please give rationale.	No	<p>This modification clearly does not better facilitate any of the BSC objectives. We are surprised that the panel should recommend a modification be made in which no members of the modification group, bar the proposer, could find any benefits to the BSC and did not better facilitate its objectives. At no point in the modification process was any evidence that there were any benefits to BSC given.</p> <p>We find it hard to believe that a Distribution planning engineer can gain any benefit from having an estimated annual consumption from a site in preference to an actual consumption when designing a network. If an estimate is adequate then why is a class average estimate of annual consumption not sufficient? This data as, well as actual consumption, is already available and used at present by Distribution businesses and involves no extra cost to the customer. The provision of an estimated annual consumption as prescribed in this modification involves the manipulation of data that is given to suppliers into a format that can be delivered to Distributors for the benefit of very few who would claim to use the data for network management.</p> <p>It is our belief that the only benefit of this modification may be the avoidance of boundary metering between DNO and IDNO sites and that consequently this modification is a very costly way of avoiding metering that would ultimately give far more accurate data. It also needs to be considered if the subsequent subsidisation of customers connected to IDNO sites should be borne by other customers by the provision of this data.</p>
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Dates for P222? Please give rationale.	Yes	Although we do not believe this modification be made.
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group? Please give rationale.	Yes	

Q	Question	Response <sup>1</sup>	Rationale
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?	No	We believe there are no cost savings indeed if there were distribution businesses should be able to reduce their level of Duos charge to customers as they already have an allowed revenue for network planning and design some of the cost of which will be passed on to suppliers. Without a subsequent adjustment in Duos charge customer are in danger of paying twice for this activity and we would expect Ofgem to consider this under the next price control should the modification be made.
6.	Are there any further comments on P222 that you wish to make?	/ No	

Please send your responses by **17:00 on Friday 30 May 2008** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email '**P222 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Panel.

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](mailto:chris.stewart@elexon.co.uk).

## P222 REPORT PHASE 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.

<b>Respondent:</b>	<i>Stuart Scott</i>
<b>Company Name:</b>	IMServ Europe
<b>No. of BSC Parties Represented</b>	
<b>Parties Represented</b>	
<b>No. of Non BSC Parties Represented</b>	1
<b>Non Parties represented</b>	<i>IMserv Europe Ltd</i>
<b>Role of Respondent</b>	<i>NHHMO/DC and DA</i> <i>HHMO/DC and DA</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

<b>Q</b>	<b>Question</b>	<b>Response <sup>1</sup></b>	<b>Rationale</b>
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P222 <b>should not</b> be made? Please give rationale.	Yes	See below
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P222 <b>should</b> be made? Please give rationale.	Yes	I agree that the alternative Modification is a better solution than the proposed modification and support the panels recommendation



Q	Question	Response <sup>1</sup>	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Dates for P222? Please give rationale.	No	An implementation date of November 2009 would suit us best as we would need to implement a new version of NHHDA with this new functionality. Given there is a code freeze until Feb. 09 on NHHDA software, this gives us six months to implement and test the changes.
4.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solutions agreed by the Modification Group? Please give rationale.	Yes	
5.	Some Panel member's views are finely balanced. Can you provide any additional BSC benefits or cost savings that would occur as a result of P222? Can you quantify these?	No	
6.	Are there any further comments on P222 that you wish to make?	Yes	We cannot tell how big these changes will be at this stage as LogicaCMG would need to change the code and therefore we cannot assess the scale of change at this point in time. We cannot see any costs from Logica in the modification report to indicate the changes. We are slightly surprised by this as would have expected to see Logica high level costs in here for the NHHDA changes.

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