

**Responses from P219 Assessment Report Consultation**

**Consultation Issued on 27 November 2007**

**Representations were received from the following parties**

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	energywatch	P219_AR_01	0	1
2.	Centrica	P219_AR_02	9	0
3.	RWE Trading	P219_AR_03	11	0
4.	SAIC Ltd. (for and on behalf of ScottishPower)	P219_AR_04	9	0
5.	British Energy	P219_AR_05	5	0
6.	National Grid	P219_AR_06	1	0
7.	EDF Energy	P219_AR_07	9	0

## P219 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.

<b>Respondent:</b>	<i>Carole Pitkeathley</i>
<b>Company Name:</b>	<i>energywatch</i>
<b>No. of BSC Parties Represented</b>	<i>n/a</i>
<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 (e.g. Agents)</b>	<i>1</i>
<b>Non Parties represented</b>	<i>Electricity consumers</i>
<b>Role of Respondent</b>	<i>Other – statutory consumer watchdog</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you believe Proposed Modification <b>P219</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	We believe that greater transparency, consistency and accessibility of market data will ensure that more players will be encouraged to enter the electricity market and take part in the trading arrangements, facilitating competition in generation and supply (objective c). We also believe that by improving the consistency of data and definitions with other industry codes, the efficiency of the trading arrangements will improve (objective d). These benefits should flow to consumers, as the ultimate bearers of costs of the trading arrangements, as efficiency savings in due course.
2.	Do you support the implementation approach described in the consultation document? Please give rationale	Yes	Both P220 and P219 are intended to increase the transparency and accessibility of market data to all market players, current and future. It would be far preferable to maximise the benefits by implementing the changes at the same time.

Q	Question	Response Error! Bookmark not defined.	Rationale
3.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
4.	Would you use the data (2 sets of Demand forecast and 2 sets of Demand Out-turn) to benefit your business? Please give rationale0	No	As the consumer watchdog, we have no direct role to play in the market but believe that improved transparency of market data assists market participants to lower their operating costs.
5.	Does P219 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
6.	Would there be any confidentiality issues regarding the two sets of data published on the BMRS?	No	We do not believe that confidentiality issues arise from publication of the data and are outweighed by the need for greater transparency.
7.	Are there any further comments on P219 that you wish to make?	Yes	Consumers benefit when markets function effectively and efficiently. A hallmark of efficient and effective markets is improved market data transparency and accessibility. We believe that P219 is a helpful development and also commend National Grid and Elexon on their recent work on developing a summary page for electricity market data.

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 **17:00 on Monday 10 December 2007** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P219 **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 Sherwin Cotta on 020 7380 4361, email address [Sherwin.Cotta@elexon.co.uk](mailto:Sherwin.Cotta@elexon.co.uk).

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<b>Respondent:</b>	<i>Laura Jeffs</i>
<b>Company Name:</b>	<i>Centrica</i>
<b>No. of BSC Parties Represented</b>	<i>9</i>
<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 (e.g. Agents)</b>	<i>0</i>
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>(Supplier/Generator/ Trader )</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

<b>Q</b>	<b>Question</b>	<b>Response</b> <small>Error! Bookmark not defined.</small>	<b>Rationale</b>
1.	Do you believe Proposed Modification <b>P219</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	Centrica believe that introducing consistency between forecast and outturn demand data will better facilitate BSC objectives (c) and (d) as P219 will seek to reduce the time taken by National Grid and Elexon to formulate responses to industry queries relating to such data. P219 will also add improved usability of BMRS data which will help parties to forecast and therefore balance more effectively. The results of the Impact Assessment will establish the likely costs associated with the implementation of P219 and will therefore determine if the proposed modification will better facilitate BSC objective (b). Therefore, at this point in time, Centrica are unable to comment on whether or not objective (b) will be better facilitated by the implementation of P219.

Q	Question	Response Error! Bookmark not defined.	Rationale
2.	Do you support the implementation approach described in the consultation document? Please give rationale	Yes	<p>Centrica agree that the BMRS high-grade website is the best location for the P219 data, with inclusion in the Tibco messaging service as a contingent measure to cover the proposed removal of the high-grade website.</p> <p>Should the Impact Assessment reveal high implementation costs, it may be necessary to consider an alternative option for the implementation of P219 via the low-grade service, however, measure must be put in place to guarantee that access must be made available to BSC Parties in the event of a high volume of public non-BSC Party users.</p> <p>In accordance with minimising the cost implications on BSC Parties as much as possible, Centrica feel that it would be sensible to implement P219 in conjunction with P220.</p> <p>It is important to maintain clarity in the implementation of P219, particularly to ensure that new market entrants are made aware of the difference between the two demand datasets.</p> <p>Centrica is amenable to the provision of both datasets in both graphical and tabular form, with an option to de-select specific line items if required.</p>
3.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	<p>Centrica believe that, of the three options that were presented to the working group (to modify the outturn data; remove elements of the forecast; or to publish both datasets), the decision not to remove any pre-existing data is the correct option.</p> <p>There are no further alternatives that Centrica wish to present to the Modification Group.</p>
4.	Would you use the data (2 sets of Demand forecast and 2 sets of Demand Out-turn) to benefit your business? Please give rationale0	Yes	<p>Centrica will use the additional demand data to be provided through the implementation of P219 as a comparable dataset to signal any errors in Centrica demand data, thereby reducing imbalance costs.</p>
5.	Does P219 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	

Q	Question	Response <small>Error! Bookmark not defined.</small>	Rationale
6.	Would there be any confidentiality issues regarding the two sets of data published on the BMRS?	No	
7.	Are there any further comments on P219 that you wish to make?	No	

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## P219 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

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<b>Respondent:</b>	<i>Bill Reed</i>
<b>Company Name:</b>	<b>RWE Trading</b>
<b>No. of BSC Parties Represented</b>	<b>11</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>RWE Trading GmbH, RWE Npower plc, Great Yarmouth Power Ltd, Npower Cogen Trading Ltd, Npower Commercial Gas Ltd, Npower Direct Ltd, Npower Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd</b>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<b>None</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 / Distributors / other – please state)</i> <b>Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent</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 believe Proposed Modification <b>P219</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	The proposal would ensure consistency in demand forecast information published in the BMRA and as a consequence will better meet BSC Objective C and Objective D.
2.	Do you support the implementation approach described in the consultation document? Please give rationale	Yes	

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

## P219 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response <sup>1</sup>	Rationale
3.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
4.	Would you use the data (2 sets of Demand forecast and 2 sets of Demand Out-turn) to benefit your business? Please give rationale0	Yes	To review the quality of the forecast data.
5.	Does P219 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
6.	Would there be any confidentiality issues regarding the two sets of data published on the BMRS?	No	
7.	Are there any further comments on P219 that you wish to make?	No	

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<b>Respondent:</b>	Gary Henderson
<b>Company Name:</b>	SAIC Ltd. (for and on behalf of ScottishPower)
<b>No. of BSC Parties Represented</b>	7
<b>Parties Represented</b>	ScottishPower Energy Management Ltd, ScottishPower Generation Ltd, ScottishPower Energy Retail Ltd, SP Transmission Ltd, SP Manweb plc, SP Distribution Ltd, CRE Energy Limited
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	0
<b>Non Parties represented</b>	N/A
<b>Role of Respondent</b>	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
<b>Does this response contain confidential information?</b>	No

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification <b>P219</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	<b>Objective (c)</b> More and accurate data, freely available to the entire market will assist smaller Parties to compete against the larger Parties, thus promoting competition.
2.	Do you support the implementation approach described in the consultation document? Please give rationale	Yes	ScottishPower agree that the Modification should be implemented in concert with P220 (if it is also approved). The change should be implemented in as cost effective a manner as possible.
3.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	

## P219 ASSESSMENT PROCEDURE CONSULTATION

Q	Question	Response	Rationale
4.	Would you use the data (2 sets of Demand forecast and 2 sets of Demand Out-turn) to benefit your business? Please give rationale0	Yes	ScottishPower believe that all available data should be utilised to assist operational business decisions.
5.	Does P219 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
6.	Would there be any confidentiality issues regarding the two sets of data published on the BMRS?	No	
7.	Are there any further comments on P219 that you wish to make?	No	

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<b>Respondent:</b>	<i>Martin Mate</i>
<b>Company Name:</b>	<i>British Energy</i>
<b>No. of BSC Parties Represented</b>	<i>5</i>
<b>Parties Represented</b>	<i>British Energy Power &amp; Energy Trading Ltd, British Energy Generation Ltd, British Energy Direct Ltd, Eggborough Power Ltd, British Energy Generation (UK) Ltd</i>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>-</i>
<b>Non Parties represented</b>	<i>-</i>
<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 believe Proposed Modification <b>P219</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	Clarity will assist efficient balancing by parties, giving benefits under BSC objectives (b) and (c) provided implementation costs are reasonable.
2.	Do you support the implementation approach described in the consultation document? Please give rationale	Yes	Yes, provided adequate notice is given of the precise format and frequency of changed and new data provision.
3.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	This is a pragmatic approach to improving data provision.
4.	Would you use the data (2 sets of Demand forecast and 2 sets of Demand Out-turn) to benefit your business? Please give rationale0	Yes	We would use this data to assist our trading, balancing and demand triad forecasting activities.

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Q	Question	Response	Rationale
5.	Does P219 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	Yes	The modification group may wish to consider the impact on participants of introducing changes to demand forecasting and reporting data during the triad season. Implementation before the next triad season might be preferable to implementation during a season.
6.	Would there be any confidentiality issues regarding the two sets of data published on the BMRS?	No	
7.	Are there any further comments on P219 that you wish to make?	No	

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<b>Respondent:</b>	<i>Shafqat Ali</i>
<b>Company Name:</b>	
<b>No. of BSC Parties Represented</b>	<i>1</i>
<b>Parties Represented</b>	<i>National Grid</i>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>-</i>
<b>Non Parties represented</b>	<i>-</i>
<b>Role of Respondent</b>	<i>Transmission Company</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you believe Proposed Modification <b>P219</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	<p>Provision of more consistent and transparent information should improve self-balancing by the market participants which should, in turn, improve the efficient, economic and co-ordinated operation of the GB transmission system (Applicable BSC Objective (b)).</p> <p>Increase in information transparency and availability of improved market information to all participants should promote effective competition in the generation and supply of electricity (Applicable BSC Objective (c)).</p> <p>Improvements to the definitions of demand terms could remove ambiguity in the BSC thereby reducing the number of queries to Elexon and promoting efficiency in the implementation and administration of the balancing and settlement arrangements (Applicable BSC Objective (d)).</p>

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Q	Question	Response	Rationale
2.	Do you support the implementation approach described in the consultation document? Please give rationale	Yes	-
3.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	-
4.	Would you use the data (2 sets of Demand forecast and 2 sets of Demand Out-turn) to benefit your business? Please give rationale	Yes	As the proposer of the Modification and GB SO we already have and use the data we are proposing to provide.
5.	Does P219 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	-
6.	Would there be any confidentiality issues regarding the two sets of data published on the BMRS?	No	As the proposer, Transmission Company has considered the confidentiality issues and, in order to manage any perceived confidentiality issues, has proposed use of Transmission System Demand rather the use of individual components that are added to the National Demand to make up the Transmission System Demand. Consequently, the demand taken by pumped storage, interconnectors and station transformers will not be shown separately.
7.	Are there any further comments on P219 that you wish to make?	No	-

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<b>Respondent:</b>	Stephen Carter
<b>Company Name:</b>	EDF Energy
<b>No. of BSC Parties Represented</b>	9
<b>Parties Represented</b>	EDF Energy Networks (EPN) plc; EDF Energy Networks (LPN) plc; EDF Energy Networks (SPN) plc; EDF Energy (Sutton Bridge Power); EDF Energy (Cottam Power) Ltd; EDF Energy (West Burton Power) Ltd; EDF Energy plc; EDF Energy Customers Plc; Seaboard Energy Limited
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	0
<b>Non Parties represented</b>	Please list all non Parties responding on behalf of (including the respondent company if relevant).
<b>Role of Respondent</b>	(Supplier/Generator/ Trader /Distributor <sup>1</sup> )
<b>Does this response contain confidential information?</b>	No

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification <b>P219</b> would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	The proposed modification should alleviate the current inconsistencies and confusion surrounding NDFD and Out-turn data. This would be achieved by having two separate information streams, National Demand (not including pumped storage, I/C etc) and Transmission System Demand (includes pumped storage and I/Cs etc), each with their own forecast and out-turn data.
2.	Do you support the implementation approach described in the consultation document? Please give rationale	Yes	National Grid have indicated that the most cost effective way of implementing P219 is where they make several changes while they have the 'hood up' on their systems.

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Q	Question	Response	Rationale
3.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
4.	How would you use the data (2 sets of Demand forecast and 2 sets of Demand Out-turn) to benefit your business? Please give rationale	Yes	While the main benefits of the modification will probably fall on the smaller players, improved information transparency should be beneficial to all agents in a competitive market.
5.	Does P219 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
6.	Would there be any confidentiality issues regarding the two sets of data published on the BMRS?	No	
7.	Are there any further comments on P219 that you wish to make?	Yes	<p>The value of information to the market must not be underestimated. Often it is difficult to value information until both the information is made available and is understood by the relevant market participant. A demand reporting system more harmonised with gas is likely to be a positive.</p> <p>The main beneficiaries could well be small HH customers on day-ahead contracts who are close to markets, but have limited ability to move them. There should therefore be no confidentiality or competition concerns.</p>

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