

Responses from P213 draft Report Consultation

Consultation Issued on 16 August 2007

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	The Micropower Council	P213_dMR_01	0	
2.	SmartestEnergy	P213_dMR_02	1	0
3.	UDMS	P213_dMR_03	0	3
4.	Scottish & Southern Energy	P213_dMR_04	6	1
5.	British Energy Direct Ltd	P213_dMR_05	5	0
6.	CE Electric	P213_dMR_06	2	0
7.	Siemens Energy Services	P213_dMR_07	0	6
8.	EDF Energy	P213_dMR_08	9	0
9.	Npower Limited	P213_dMR_09	10	0
10.	E.ON UK Energy Services Limited	P213_dMR_10	0	1
11.	Scottish Power	P213_dMR_11	4	2
12.	United Utilities Electricity Plc	P213_dMR_12	1	0
13.	E.ON UK	P213_dMR_13	4	0

P213 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.

Respondent:	<i>Name: Jonah Anthony</i>
Company Name:	<i>The Micropower Council</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>See below</i>
Non Parties represented	<i>The Micropower Council's membership is drawn from across the whole spectrum of stakeholders operating in the Micropower sector. This includes electricity and gas companies, manufacturers, trade associations, professional institutions, not-for-profit companies, non-government organisations, charities and private individuals, all of whom have a strong interest and expertise in the development of the micropower sector. A list of our members is available at http://www.micropower.co.uk/council/members.html</i>
Role of Respondent	<i>The Micropower Council provides the micropower industry's (including all low carbon micro heat and electricity technologies) main focal point for Government, regulators, Parliament and opinion formers on regulation and public policy issues affecting the production by consumers of their own sustainable heat and power.</i> <i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributors / other – please state ¹)</i>
Does this response contain confidential information?	<i>NO</i>

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

P213 REPORT PHASE CONSULTATION

Q	Question	Response ¹	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P213 should not be made? Please give rationale.	Yes / No	
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P213 should not be made? Please give rationale.	No	The Micropower Council is disappointed that no real alternative has been proposed and suggest that the decision to propose rejecting P213 Alternative, without having first demonstrated that there is a real and effective alternative approach (whether based on enhancing P81 or some other route), is premature. We also believe that, for the vast majority of installations likely to be covered by P213, that P213 ALt will PROMOTE competition by making it more attractive for suppliers to wish to purchase export and so compete to provide this service. Removing the flexibility to have separate contracts with different suppliers for the export and import is unlikely to have any material impact competition at the smaller end of the market because there is little realistic prospect that suppliers would find it cost effective to offer separate import export tariffs that are more attractive than a combined import/export tariff - so it is effectively a redundant option. In practice, removing an option that is unlikely to be used does not reduce flexibility or competition.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date (of 06 November 2008) for P213? Please give rationale.	Yes / No	
4.	The Panel noted relatively high costs for a number of Parties to implement P213. Please provide further detail regarding the origin of the costs arising from the impact of P213 on your organisation.		We believe it is essential to distinguish between the costs that truly result from the proposed change as opposed to the set up costs that might be incurred if a supplier decides to use P231 or its alternative (and which may be similar to the set up costs suppliers could incur should they decide to use P81).

P213 REPORT PHASE CONSULTATION

Q	Question	Response ¹	Rationale
5.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes / No	No comment.
6.	Are there any further comments on P213 that you wish to make?	Yes	The Micropower Council is disappointed that no real alternative has been proposed and suggest that the decision to propose rejecting P213 Alternative, without having first demonstrated that there is a real and effective alternative approach (whether based on enhancing P81 or some other route), is premature.

Please send your responses by **5pm on Wednesday 29 August 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 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 Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 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.

Respondent:	<i>Colin Prestwich</i>
Company Name:	<i>SmartestEnergy</i>
No. of BSC Parties Represented	<i>1</i>
Parties Represented	<i>SmartestEnergy</i>
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	
Role of Respondent	<i>Supplier/Trader / Consolidator</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response ¹	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P213 should not be made? Please give rationale.	Yes	This appears to be an expensive and elaborate modification when the current arrangements work and are consistent with the HH market.
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P213 should not be made? Please give rationale.	Yes	We are concerned about the implications for competition and commercial innovation under this proposal.

P213 REPORT PHASE CONSULTATION

Q	Question	Response ¹	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date (of 06 November 2008) for P213? Please give rationale.		These changes would require fundamental changes to certain participants systems. It is difficult to know at this stage whether the timescales suggested by some participants are motivated by a desire to obstruct the change. It will be interesting to see whether there are any participants in favour of change who also believe the timescale is too short.
4.	The Panel noted relatively high costs for a number of Parties to implement P213. Please provide further detail regarding the origin of the costs arising from the impact of P213 on your organisation.		
5.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.		
6.	Are there any further comments on P213 that you wish to make?	No	

Please send your responses by **5pm on Wednesday 29 August 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 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 Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 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.

Respondent:	<i>Alex Pourcelot</i>
Company Name:	UDMS
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	3
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>NHHDA, HHDA, HHDC</i>
Does this response contain confidential information?	<i>No.</i>

P213 REPORT PHASE CONSULTATION

Q	Question	Response ¹	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P213 should not be made? Please give rationale.	Yes	Not implementing the proposal will save costs and keep processing simpler, by having a single methodology for both HH and NHH markets. Elexon have estimated their costs as being ~£350K. Similar (order of scale) costs are likely to be incurred by Suppliers and Supplier Agents, impacting most participants and making overall costs to the industry considerable. Not implementing the proposal also maintains valuable flexibility for the industry and future proofs providing opportunities for innovative trading - in the future microgeneration scenarios may require the ability to trade import and export MPANs separately, the proposal would have been a constraint to that and reduced flexibility. NHH may be less expensive for parties and it seems right that NHH should enjoy the same flexibility as HH and that parties should not be forced, potentially, to adopt the HH Measurement Class in order to get the flexibility that is already available and that this proposal would remove
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P213 should not be made? Please give rationale.	Yes	Not implementing the proposal will save costs and keep processing simpler, by having a single methodology for both HH and NHH markets. Elexon have estimated their costs as being ~£350K. Similar (order of scale) costs are likely to be incurred by Suppliers and Supplier Agents, impacting most participants and making overall costs to the industry considerable. Not implementing the proposal also maintains valuable flexibility for the industry and future proofs providing opportunities for innovative trading - in the future microgeneration scenarios may require the ability to trade import and export MPANs separately, the proposal would have been a constraint to that and reduced flexibility. NHH may be less expensive for parties and it seems right that NHH should enjoy the same flexibility as HH and that parties should not be forced, potentially, to adopt the HH Measurement Class in order to get the flexibility that is already available and that this proposal would remove
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date (of 06 November 2008) for P213? Please give rationale.	Yes	

P213 REPORT PHASE CONSULTATION

Q	Question	Response ¹	Rationale
4.	The Panel noted relatively high costs for a number of Parties to implement P213. Please provide further detail regarding the origin of the costs arising from the impact of P213 on your organisation.		It is far less expensive and far simpler for operations to have a single methodology for dealing with NHH and HH Import Export scenarios, as in having a separate MPAN for Import and Export - the arrangement that has been in place for several years for HH. Maintaining the same operational routines for both NHH and HH is going to be make systems simpler to operate and maintain; and make change control less expensive (than having to maintain and change separate methodologies, which P213 would introduce.)
5.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes	
6.	Are there any further comments on P213 that you wish to make?	No	

Please send your responses by **5pm on Wednesday 29 August 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 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 Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 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.

Respondent:	<i>Cher Harris</i>
Company Name:	Scottish & Southern Energy
No. of BSC Parties Represented	6
Parties Represented	<i>SSE Energy Supply Ltd, SSE Generation Ltd, Keadby Generation Ltd, Medway Power Ltd, Southern Electric Power Distribution plc, Scottish Hydro-Electric Power Distribution Ltd</i>
No. of Non BSC Parties Represented	1
Non Parties represented	<i>SSE Power Distribution Ltd</i>
Role of Respondent	<i>Supplier/Generator/ Party Agent / Distributor</i>
Does this response contain confidential information?	<i>(If yes, please clearly mark which information within your response is confidential).</i>

Q	Question	Response ¹	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P213 should not be made? Please give rationale.	Yes No	Existing process is fit for purpose and cost justified. Whilst we understand the reasoning behind the proposal, we do not think it should replace the existing process. We are not convinced that the solution proposed under P213 is 'better' than the existing P81 process. There is no evidence to suggest that the uptake of P213 will be any higher than P81. Implementing 2 different processes to deal with microgen sites will be ineffective and uneconomic. It would add additional complexity and cost to amend both the central systems and Parties' systems and procedures. It could also have an adverse impact on competition.

P213 REPORT PHASE CONSULTATION

Q	Question	Response ¹	Rationale
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P213 should not be made? Please give rationale.	Yes No	There is no evidence to suggest that the uptake of P213 will be any higher than P81. In fact, if P213 were made the only option for Settling microgeneration, it could potentially dissuade Parties who have already invested in the P81 solution from settling any microgen sites. We do not believe that there is necessarily a tangible benefit to the customer if the new P213 process is implemented. Indeed the high cost of implementation in the short term could possibly have a negative impact on export reward.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date (of 06 November 2008) for P213? Please give rationale.	Yes No	
4.	The Panel noted relatively high costs for a number of Parties to implement P213. Please provide further detail regarding the origin of the costs arising from the impact of P213 on your organisation.		P213 would be much more expensive to support than the multiple MPAN solution. The system data model supports the multiple MPAN solution. To support this proposal would require several fundamental data model changes and associated functionality changes.
5.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes No	
6.	Are there any further comments on P213 that you wish to make?	Yes No	

Please send your responses by **5pm on Wednesday 29 August 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 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 Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 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.

Respondent:	Deborah Bird
Company Name:	British Energy Direct Ltd
No. of BSC Parties Represented	5
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	-
Non Parties represented	-
Role of Respondent	Supplier/Generator
Does this response contain confidential information?	No

Q	Question	Response ¹	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P213 should not be made? Please give rationale.	Yes	Having Import and Export on the same MPAN would distort Settlements and the proposed arrangements for calculating profiled flow would introduce unnecessary complexity and potential for error. We are in agreement with the Panel that P213 presents a risk to data quality. Introducing a partial single MPAN solution is still anti-competitive and could cause issues around Change of Supplier. Also a dual-process solution is inefficient and would over-complicate the situation causing greater risk to settlement.

P213 REPORT PHASE CONSULTATION

Q	Question	Response ¹	Rationale
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P213 should not be made? Please give rationale.	Yes	In addition to the Settlement risk of the single MPAN solution outlined in the response to Question 1, mandating Single MPAN usage for both import and export raises even more competition issues than proposed modification P213. P213 would reduce competition in the sale to and purchase from customers of electricity by suppliers. Currently, a customer can choose to register the Import and Export MPANs separately with different Suppliers. Implementing P213 would reduce this choice of Supplier. We agree with the panel that the P213 alternative would remove the ability for customers to have a different Supplier for Import and Export and therefore reduce competition.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date (of 06 November 2008) for P213? Please give rationale.	No	An implementation date of 06 November 2008 would not allow us adequate time to complete the necessary system and processes changes. As previously indicated, the implementation period would need to be greater than 18 months <u>from the Authority's decision</u> to allow appropriate system and process changes to take place, depending on which (if any) solution is chosen.
4.	The Panel noted relatively high costs for a number of Parties to implement P213. Please provide further detail regarding the origin of the costs arising from the impact of P213 on your organisation.		P213 would have a significant impact on our current processes and would require major system changes as a result of the changes to the DTC and flows. We attribute the high costs to the following; a) completing a full investigation into the impact of the proposed change to our existing business processes and customers b) significant changes to the database structure (and business rules) of multiple systems involving Non Half Hourly pricing, registration and billing, currently designed to operate on existing MPAN definitions. c) planning resource requirements for development, testing and implementation phases i.e. Aligning this proposed change with other significant project commitments d) managing the development, testing and implementation of changes to internal and external systems e) redesign of our existing business processes f) training users in affected business areas in new business process
5.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes / No	No comment.

P213 REPORT PHASE CONSULTATION

Q	Question	Response ¹	Rationale
6.	Are there any further comments on P213 that you wish to make?	Yes	As previously stated, British Energy are not in favour of P213. We are concerned that the new P213 process discourages competition and is not in the best interest of the customer. Implementing P213 would remove consumer choice. Having Import and Export on the same MPAN would distort Settlements and, to maintain the accuracy of Settlement, Import and Export should be recorded as separate MPANS. We support the Panel in their decision to look at the current arrangements to see if improvements can be made. It would seem more beneficial to use the current arrangements (introduced by P081) to register Export MPANs in Settlement and work towards making it compulsory for all Suppliers to follow. This would appear to be a more cost effective approach as we can see no cost benefit to implementing P213. We also agree with the Panel that the stated high costs associated with the use of the existing P081 solution have not been proven.

Please send your responses by **5pm on Wednesday 29 August 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 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 Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 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.

Respondent:	<i>Pat Wormald</i>
Company Name:	CE Electric
No. of BSC Parties Represented	2
Parties Represented	<i>Yorkshire Electricity Distribution plc (YEDL) & Northern Electric Distribution Ltd (NEDL)</i>
No. of Non BSC Parties Represented	
Non Parties represented	
Role of Respondent	<i>Distributor</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response ¹	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P213 should not be made? Please give rationale.	Yes	More impact analysis would need to be carried out to establish how DNOs would manage single MPANs with potentially two LLFCS assigned to them and we would need to understand how the proposed new SSCs would work in the settlement and billing processes. The financial impact on changes to MPRS and billing systems would need to be quantified.
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P213 should not be made? Please give rationale.	Yes	More impact analysis would need to be carried out to establish how DNOs would manage single MPANs with potentially two LLFCS assigned to them and we would need to understand how the proposed new SSCs would work in the settlement and billing processes. The financial impact on changes to MPRS and billing systems would need to be quantified.

P213 REPORT PHASE CONSULTATION

Q	Question	Response ¹	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date (of 06 November 2008) for P213? Please give rationale.	No	We believe that until more detailed analysis is carried out an implementation date cannot be agreed
4.	The Panel noted relatively high costs for a number of Parties to implement P213. Please provide further detail regarding the origin of the costs arising from the impact of P213 on your organisation.		The financial impact on changes to MPRS and billing systems would need to be quantified. If the proposal is agreed then more detailed analysis of the changes would need to be established.
5.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.		Not reviewed
6.	Are there any further comments on P213 that you wish to make?	Yes	It would seem that there is not overwhelming support for this change and the perceived problems with the existing process P081 seem to centre around the problem with DNOs creating export MPANs and the additional administration costs, little mention is made of the financial impact on parties to change systems and the complexity of creating a greater number of SSC etc to facilitate settlement. Whereas the existing process facilitates customer choice of supplier, makes it clear who owns the metering and reduces the risk of meter registration errors.

Please send your responses by **5pm on Wednesday 29 August 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 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 Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 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.

Respondent:	<i>Jenn Jones</i>
Company Name:	<i>Siemens Energy Services</i>
No. of BSC Parties Represented	<i>0</i>
Parties Represented	<i>N/a</i>
No. of Non BSC Parties Represented	<i>6</i>
Non Parties represented	<i>NHHDA, NHHDC, MO, MA, HHDC, HHDA</i>
Role of Respondent	<i>Party Agent</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response ¹	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P213 should not be made? Please give rationale.	Yes	We agree with the panel's recommendation that the proposed modification P213 should not be made. An optional solution would add an extra level of complexity to the arrangements, resulting in a less coherent approach.
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P213 should not be made? Please give rationale.	Yes	We agree with the panel's recommendation that the alternative modification P213 should not be made. As previously stated, we do not believe that the benefit of this change outweighs the significant cost to the industry.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date (of 06 November 2008) for P213? Please give rationale.	Yes	

P213 REPORT PHASE CONSULTATION

Q	Question	Response ¹	Rationale
4.	The Panel noted relatively high costs for a number of Parties to implement P213. Please provide further detail regarding the origin of the costs arising from the impact of P213 on your organisation.		Significant systems changes would be required for us to facilitate the implementation of P213. In light of this our costs relate to design, development and testing of the new solution.
5.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes	
6.	Are there any further comments on P213 that you wish to make?	No	

Please send your responses by **5pm on Wednesday 29 August 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 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 Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 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.

Respondent:	<i>Dave Morton</i>
Company Name:	EDF Energy
No. of BSC Parties Represented	9
Parties Represented	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; Seeboard Energy Limited
No. of Non BSC Parties Represented	0
Non Parties represented	N/A
Role of Respondent	Supplier/Generator/Trader/Distributor
Does this response contain confidential information?	<i>(If yes, please clearly mark which information within your response is confidential).</i>

Q	Question	Response ¹	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P213 should not be made? Please give rationale.	Yes	We agree with BSC Panel that proposed modification should not be made as if implemented P213 would increase the risk of settlement error due to the complex nature of this solution.
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P213 should not be made? Please give rationale.	Yes	We agree with BSC Panel that alternative modification should not be made as if implemented it would reduce competition by preventing customers having different suppliers for import and export.

P213 REPORT PHASE CONSULTATION

Q	Question	Response ¹	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date (of 06 November 2008) for P213? Please give rationale.	No	A November 2009 implementation date would be more realistic.
4.	The Panel noted relatively high costs for a number of Parties to implement P213. Please provide further detail regarding the origin of the costs arising from the impact of P213 on your organisation.		Significant system changes would be required to support P213, the registration, set up, billing and settlement functions would all be affected by this modification.
5.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes	
6.	Are there any further comments on P213 that you wish to make?	No	

Please send your responses by **5pm on Wednesday 29 August 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 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 Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 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.

Respondent:	<i>Roslyn Bucknall</i>
Company Name:	<i>Npower Limited</i>
No. of BSC Parties Represented	<i>10</i>
Parties Represented	<i>RWE Trading GmbH; RWE Npower Ltd; Npower Commercial Gas 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	<i>None</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 agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P213 should not be made? Please give rationale.	Yes	We agree with the Panel's recommendation that Proposed Modification P213 should not be made. We do not believe that P213 offers a robust solution to facilitate Microgeneration as the increased complexity of the new processes that would be introduced could compromise the accuracy of Settlement; therefore with this increased risk in mind, we cannot see that P213 will improve the efficiency of the existing arrangements.
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P213 should not be made? Please give rationale.	Yes	We agree with the Panel's recommendation that Alternative Modification P213 should not be made. The Alternative Modification will restrict competition by removing the option of registering the Import and Export MPANs separately with different Suppliers. We also believe that the cost to implement P213 will be higher than the costs incurred to implement P81 due to process impacts and the

P213 REPORT PHASE CONSULTATION

			number of system changes involved.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date (of 06 November 2008) for P213? Please give rationale.	No	In the absence of an updated, accurate and agreed Business Requirement Specification, we would require a minimum lead time of 12 months upon the publication of the red-lined Code Subsidiary Documents, therefore we do not believe that an implementation date of 6 November 2008 is feasible.
4.	The Panel noted relatively high costs for a number of Parties to implement P213. Please provide further detail regarding the origin of the costs arising from the impact of P213 on your organisation.		As previously advised in CPC00606, our assessment suggests that there would have to be changes to numerous internal systems, which would have to be supported by process changes and further detail on these is outlined below. Changes to a significant number of systems that load MDD dataflows will be required, and these include the following: • Settlements • Registration • Billing • Job Booking - changes to ensure the correct job type is raised and validated, should a new job booking type be required. • MOA - system changes would be needed to load exclusive Export SSC and combined Import / Export SSC, which will need new deprogramming logic to allow the appropriate register data to be captured and uploaded into MOA with the correct register IDs, Measurement Quantity ID and TPR combinations. Reading validation scripts and associated procedures may also need altering. Additional validation relating to dual Import/Export measurements within one MPAN would also have to be considered. Changes to support import and export with different load curves, for forecasts based upon standard load curves, on the same MPAN in the same half hour, would be required. Revised Register Conventions will also need to be considered for both combined Import and Export registered meters and WP140 would have to be updated to reflect this. The above mentioned high level assessment shows the degree of the extensive changes required to implement P213, and we estimate that these

P213 REPORT PHASE CONSULTATION

			would cost in the region of a 7 figure sum, although this is not an exhaustive list.
5.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	No	We don't think it was the intention to exclude cases which already have switched load metering, however this wording does. 6.7A – suggest there should be an 'and' between the 'where' clauses rather than a full stop. Annex S2, - 8.1.4 (a) and Annex X-2: the use of an apostrophe in the subscripts is unusual, a dash would be preferable. Confirmation required that any subsequent changes to the table will be dealt with through the appropriate change process. Section L2.2.1 (c) we don't believe it was the intention to require micro generators that only have export to use HH metering.
6.	Are there any further comments on P213 that you wish to make?	Yes	In line with our previous response, we would welcome a full review of the existing Microgeneration arrangements to further understand the reasons as to why there is a low take up of P81. Moving to a single MPAN solution removes a customer's choice of having separate Suppliers for their Import and Export, which could be viewed as anti-competitive. In our opinion, we believe that this proposal would have benefited by having been raised as an Issue where discussions could have taken place at an Industry Expert Group, to help better understand the implications of the proposed solutions prior to a Modification being drafted.

Please send your responses by **5pm on Wednesday 29 August 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 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 Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 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.

Respondent:	<i>Alastair Barnsley</i>
Company Name:	E.ON UK Energy Services Limited
No. of BSC Parties Represented	0
Parties Represented	
No. of Non BSC Parties Represented	1
Non Parties represented	E.ON UK Energy Services Limited
Role of Respondent	<i>Party Agent</i>
Does this response contain confidential information?	<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 P213 should not be made? Please give rationale.	Yes	The use of two parallel systems would have the potential to introduce confusion.
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P213 should not be made? Please give rationale.	No	The use of a Single MPAN associated with a single supplier would simplify our processes when addressing Import & Export sites.

P213 REPORT PHASE CONSULTATION

Q	Question	Response	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date (of 06 November 2008) for P213? Please give rationale.	Yes	
4.	The Panel noted relatively high costs for a number of Parties to implement P213. Please provide further detail regarding the origin of the costs arising from the impact of P213 on your organisation.		We are unable to define costs at this time
5.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes	
6.	Are there any further comments on P213 that you wish to make?	No	

Please send your responses by **5pm on Monday 27 August 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 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 Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 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.

Respondent:	James Nixon
Company Name:	
No. of BSC Parties Represented	4
Parties Represented	Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant). Scottish Power UK Ltd, ScottishPower Energy Management Ltd, ScottishPower Generation Ltd, ScottishPower Energy Retail Ltd
No. of Non BSC Parties Represented	2
Non Parties represented	Please list all non Parties responding on behalf of (including the respondent company if relevant). SP Dataserve UK Ltd
Role of Respondent	(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributor / other – please state ¹) Supplier/Generator/ Trader / Party Agent
Does this response contain confidential information?	(If yes, please clearly mark which information within your response is confidential). No

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 P213 should not be made? Please give rationale.	Yes	ScottishPower supports the Panel's provisional view, as expressed in the P213 Draft Modification Report. In particular, ScottishPower agrees that no evidence has been introduced to demonstrate that the BSC is defective in this area, or that the implementation of P213 would address such a defect if it did exist.

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

P213 REPORT PHASE CONSULTATION

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 P213 should not be made? Please give rationale.	Yes	ScottishPower agrees with the Panel's provisional view, as expressed in the P213 Draft Modification Report, that P213 Alternative would inhibit competition. In addition, it would discourage Suppliers from registering Small Scale Third Party Generating Plant until these new arrangements were in place; effectively resulting in a moratorium on such registrations for two years.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date (of 06 November 2008) for P213? Please give rationale.	No	Although ScottishPower broadly agrees that the pace of industry change can at times be frustratingly pedestrian, P213 offers such a degree of complexity that implementation by November 2008 is unrealistic. Both the proposed and alternative modifications touch a wide range of systems and processes requiring a considered and detailed approach to ensure there is no adverse customer impact. It seems unlikely that an Elexon-drafted Business Requirements Solution will be available until early 2008, leaving little time to design and implement an internal solution.
4.	The Panel noted relatively high costs for a number of Parties to implement P213. Please provide further detail regarding the origin of the costs arising from the impact of P213 on your organisation.		Changes would be required to systems managing every part of the process from new connections, change of supply, meter operations, settlements and billing. This presents a significant challenge to co-ordinate and would put a considerable strain on IT resource.
5.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	No	Minor amendment: - 6.7A Should read SVA Metering System measures both Import and Export
6.	Are there any further comments on P213 that you wish to make?	No	

Please send your responses by **5pm on Wednesday 29 August 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 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 Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 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.

Respondent:	<i>Vara Tadi</i>
Company Name:	United Utilities Electricity Plc
No. of BSC Parties Represented	One
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	
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	Distributor
Does this response contain confidential information?	<i>No</i>

Q	Question	Response ¹	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P213 should not be made? Please give rationale.	Yes	We do not want to implement Modification or Alternative Proposal of P213.
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P213 should not be made? Please give rationale.	Yes	We do not want to implement Modification or Alternative Proposal of P213.

P213 REPORT PHASE CONSULTATION

Q	Question	Response ¹	Rationale
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date (of 06 November 2008) for P213? Please give rationale.	No	We do not want to implement Modification or Alternative Proposal of P213. Also the original proposal stated November 2009
4.	The Panel noted relatively high costs for a number of Parties to implement P213. Please provide further detail regarding the origin of the costs arising from the impact of P213 on your organisation.		P213 would require changes to; MPAS System UUE Distribution System Introduction of new PC/MTC/LLF combinations Possible DTC changes SCDuoS
5.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes / No	
6.	Are there any further comments on P213 that you wish to make?	Yes	On previous consultation

Please send your responses by **5pm on Wednesday 29 August 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 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 Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 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.

Respondent:	<i>Name</i> Colette Baldwin
Company Name:	E.ON UK
No. of BSC Parties Represented	E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power
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	
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributor / other – please state ¹)</i> Supplier
Does this response contain confidential information?	<i>(If yes, please clearly mark which information within your response is confidential).</i> No

Q	Question	Response ¹	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P213 should not be made? Please give rationale.	Yes	Two systems would introduce more complexity to the process and lead to greater problems on change of supplier and tenancy

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

P213 REPORT PHASE CONSULTATION

Q	Question	Response ¹	Rationale
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P213 should not be made? Please give rationale.	No	This is our preferred solution
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date (of 06 November 2008) for P213? Please give rationale.	Yes	Yes – the proposed timescales for 2009 were unreasonable
4.	The Panel noted relatively high costs for a number of Parties to implement P213. Please provide further detail regarding the origin of the costs arising from the impact of P213 on your organisation.		
5.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes	
6.	Are there any further comments on P213 that you wish to make?	Yes	We do not believe the current P81 solution is the right solution for this growing market and that since there are still relatively small numbers that would be affected by changing the process this would seem to be the right time to make significant changes and future proof the solution.

Please send your responses by **5pm on Wednesday 29 August 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 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 Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.