

Responses from P193 Assessment Consultation

Consultation Issued 29 September 2005

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	E.ON UK	P193_AR_001	15	0
2.	EDF Trading Ltd	P193_AR_002	2	0
3.	British Gas Trading	P193_AR_003	1	0
4.	National Grid Electricity Transmission plc	P193_AR_004	1	0
5.	EDF Energy	P193_AR_005	9	0
6.	Scottish and Southern	P193_AR_006	5	0
7.	Scottish Power	P193_AR_007	6	0
8.	RWE Npower	P193_AR_008 *	10	0

* Late response

P193 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

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

Respondent:	<i>E.ON UK</i>
Company Name:	
No. of BSC Parties Represented	<i>15</i>
Parties Represented	E.ON UK plc, Powergen Retail Limited, Cottam Development Centre Limited, Enizade Ltd, E.ON UK Drakelow Limited, E.ON UK Ironbridge Limited, E.ON UK High Marnham Limited, Midlands Gas Limited, Western Gas Limited, TXU Europe (AHG) Limited, TXU Europe (AH Online) Limited, Citigen (London) Limited, Severn Trent Energy Limited (known as TXU Europe (AHST) Limited), TXU Europe (AHGD) Limited and Ownlabel Energy.
No. of Non BSC Parties Represented (e.g. Agents)	<i>N/A</i>
Non Parties represented	<i>N/A</i>
Role of Respondent	Supplier, Generator, Trader, Consolidator & Exemptable Generator

Q	Question	Response	Rationale
1.	Do you believe that the Proposed Modification P193 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	E.ON UK believe that this modification will increase the efficiency of the current arrangements.
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
3.	Does P193 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	
4.	Are there any further comments on P193 that you wish to make?	No	

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

Please send your responses by **12:00 noon on Tuesday 11 October 2005** to modification.consultations@elexon.co.uk and please entitle your email '**P193 Assessment Procedure 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 Kathryn Coffin on 020 7380 4030, email address kathryn.coffin@elexon.co.uk.

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Respondent:	<i>Steve Drummond</i>		
Company Name:	<i>EDF Trading Ltd</i>		
No. of BSC Parties Represented	<i>2</i>		
Parties Represented	<i>EDF Trading Ltd and EDF (Generation)</i>		
No. of Non BSC Parties Represented (e.g. Agents)	<i>None</i>		
Non Parties represented	<i>N/A</i>		
Role of Respondent	<i>Trader/Generator</i>		
Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you believe that the Proposed Modification P193 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	The proposed Modification would give the potential to reduce the process time for Panel raised mods by a month without any loss of transparency or accuracy of assessment. This is clearly more efficient and, as such, would better facilitate the achievement of Applicable BSC Objective (d), when compared to the current Code baseline.
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered?	No	
3.	Does P193 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure?	No	
4.	Are there any further comments on P193 that you wish to make?	No	

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Respondent:	<i>Mark Manley</i>
Company Name:	
No. of BSC Parties Represented	
Parties Represented	British Gas Trading (BGT)
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	
Role of Respondent	

Q	Question	Response	Rationale
1.	Do you believe that the Proposed Modification P193 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	BGT believe the modification proposal better facilitates Applicable BSC Objective (d). Combining the request to raise a modification with the presentation of the IWA will improve the efficiency of the process by removing the month time lag. The proposed solution does not diminish the transparency as the request and the IWA will be included on the Panel agenda. Therefore P193 will improve the efficiency of the modification process and thereby improve efficiency in the administration of the BSC.
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
3.	Does P193 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	
4.	Are there any further comments on P193 that you wish to make?	No	

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Respondent:	Richard Dunn
Company Name:	National Grid Electricity Transmission plc
No. of BSC Parties Represented	1
Parties Represented	National Grid Electricity Transmission plc
No. of Non BSC Parties Represented (e.g. Agents)	0
Non Parties represented	N/A
Role of Respondent	Transmission System Operator

Q	Question	Response	Rationale
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Q	Question	Response	Rationale
1.	<p>Do you believe that the Proposed Modification P193 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)</p>	Yes	<p>National Grid believes that P193 will better facilitate Applicable BSC Objective (d) – promoting efficiency in the implementation and administration of the balancing and settlement arrangements.</p> <p>The main reasons why P193 will better facilitate Applicable Objective (d) are;</p> <ol style="list-style-type: none"> 1. P193 will enable the BSC Panel to raise a modification proposal and submit it to the Definition Procedure, Assessment Procedure or Report Phase at the same meeting whereas at present this process is spread over two meetings; 2. P193 will also enable the Initial Written Assessment (IWA) to be presented at the same meeting that the Panel raises a Modification Proposal along with BSSCCo's or the TDC's recommendation; 3. P193 retains the current flexibility available to the BSC Panel of the option to defer the IWA or postpone raising a Modification Proposal to the next Panel meeting if the Panel believes that it still has insufficient information about the implications of that Modification Proposal; 4. P193 will potentially reduce the current timescale for processing a Panel raised Modification Proposal by one month; 5. P193 can be readily applied to "housekeeping" type Modification Proposals saving time and effort on straightforward Modification Proposals. <p>In addition P193 will assist the Panel in discharging its responsibilities under Section F1.2.2 of the BSC - operating the Modification Procedures in an efficient, economical and expeditious manner and facilitating achievement of the Applicable BSC Objectives.</p>

Q	Question	Response	Rationale
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
3.	Does P193 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	Rationale
4.	Are there any further comments on P193 that you wish to make?	Yes	<p>National Grid notes that the Modification Group (and previously the Issue 9 group) considered two potential alternative solutions to P193. One alternative would allow BSCCo and the TDC to recommend and/or the Panel to agree to the raising of a proposal outside of regular Panel meetings. The second alternative would allow BSCCo to raise Modification Proposals in its own right. National Grid agrees with the Modification Group's (and the earlier Issue 9 group's) recommendation that these alternatives are a significant departure from the current governance arrangements and therefore unsuitable for the reasons set out in the P193 Assessment Consultation document. National Grid believes that neither of these alternatives would better facilitate Applicable BSC Objective (d) as compared with P193 which builds on the current governance arrangements.</p> <p>In its approval decision letter for CAP085 Consultation Alternative Amendment dated 4th August 2005, the Authority commented that "Ofgem considers that it is appropriate to deal with the type of amendments which have come to be defined by established working practice as "housekeeping" changes in a more efficient manner than is currently provided for by current interpretation of the provisions of the CUSC" As noted in response to question 1 above P193 embraces a more efficient process for dealing with "housekeeping" changes in the BSC. Although P193 is not equivalent to CAP085 Consultation Alternative Amendment, in National Grid's view P193 produces similar process efficiencies for "housekeeping" changes in the BSC as are now contained in the CUSC.</p>

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Respondent:	David Lewis
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; London Energy plc; Seaboard Energy Limited
No. of Non BSC Parties Represented (e.g. Agents)	0
Non Parties represented	0
Role of Respondent	(Supplier/Generator/ Trader)

Q	Question	Response	Rationale
1.	Do you believe that the Proposed Modification P193 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	In allowing the Panel to raise and submit a Modification Proposal directly to the Definition, Assessment or Report Phase at the same meeting, this modification will reduce the timescale for progression by 1 month. By accelerating the overall process, this modification will promote efficiency in the implementation and administration of the balancing and settlement arrangements (Objective d).
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
3.	Does P193 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	Rationale
4.	Are there any further comments on P193 that you wish to make?	No	

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Respondent:	<i>John Sykes</i>
Company Name:	<i>Scottish and Southern Energy</i>
No. of BSC Parties Represented	<i>5</i>
Parties Represented	<i>This response is sent on behalf of Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd.</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>None</i>
Non Parties represented	
Role of Respondent	<i>Supplier/ Generator/ TraderConsolidator/ Party Agent / Distributor</i>

Q	Question	Response	Rationale
1.	Do you believe that the Proposed Modification P193 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	Time and resource saving. However, the facility to have a distinct Assessment Phase if it is deemed necessary should be retained (as proposed).
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
3.	Does P193 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	
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Respondent:	<i>James Kelly</i>
Company Name:	<i>SAIC Ltd for ScottishPower</i>
No. of BSC Parties Represented	<i>6</i>
Parties Represented	<i>Scottish Power UK plc; ScottishPower Energy Management Ltd.; ScottishPower Generation Ltd; ScottishPower Energy Retail Ltd.; SP Transmission Ltd; SP Manweb plc.</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>0</i>
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</i>

Q	Question	Response	Rationale
1.	Do you believe that the Proposed Modification P193 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	<p>ScottishPower supports Modification P193 believing that it will better facilitate Applicable Objective (d) ‘Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.’</p> <p>ScottishPower supports the view that the changes proposed in P193 would lead to Modifications being progressed in a more efficient and timely manner.</p> <p>ScottishPower is reassured that the Panel would still have the provision to defer consideration of the Modification if it considered that further information was required.</p>
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	

Q	Question	Response	Rationale
3.	Does P193 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	
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Respondent:	<i>Terry Ballard</i>
Company Name:	<i>RWEpower</i>
No. of BSC Parties Represented	<i>10</i>
Parties Represented	<i>RWE Trading GmbH, RWEpower, Npower Cogen Trading Ltd; Ltd, Npower Commercial Gas Ltd, Npower Direct Ltd, Npower Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd</i>
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	<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 / Distributors / other – please state ¹)</i>

Q	Question	Response ¹	Rationale
1.	Do you believe that the Proposed Modification P193 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	It will better facilitate the achievement of objective (d).
2.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
3.	Does P193 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	

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

Q	Question	Response ¹	Rationale
4.	Are there any further comments on P193 that you wish to make?	No	

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