

Responses from P193 Draft Report Consultation

Consultation Issued 11 November 2005

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	RWEnpower	P193_dMR_001	10	0
2.	E.ON UK	P193_dMR_002	15	0
3.	National Grid	P193_dMR_003	1	0
4.	Scottish and Southern	P193_dMR_004	5	0
5.	Scottish Power	P193_dMR_005	6	0
6.	British Gas	P193_dMR_006	1	0
7.	EDF Energy	P193_dMR_007	9	0

P193 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>Terry Ballard</i>
Company Name:	RWEnpower
No. of BSC Parties Represented	10
Parties Represented	<i>RWE Trading Gmbh, RWE Npower plc, 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</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>

Q	Question	Response	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority, contained in the draft Modification Report, that the Proposed Modification should be made?	Yes	It better facilitates applicable BSC objective (d).
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the issue or defect identified in the Modification Proposal?	Yes	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P193?	Yes	

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

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

Please send your responses by **5pm** on **Friday 18 November 2005** to modification.consultations@elexon.co.uk and please entitle your email '**P193 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 Kathryn Coffin on 020 7380 4030, email address kathryn.coffin@elexon.co.uk.

P193 REPORT PHASE CONSULTATION QUESTIONS

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	<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 agree with the Panel's provisional recommendation to the Authority, contained in the draft Modification Report, that the Proposed Modification should be made?	Yes	The amendment proposal should reduce the time taken to consider Panel raised amendments thereby increasing the efficiency of the arrangements.
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the issue or defect identified in the Modification Proposal?	Yes	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P193?	Yes	
4.	Are there any further comments on P193 that you wish to make?	No	

P193 REPORT PHASE CONSULTATION QUESTIONS

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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	0
Non Parties represented	N/A
Role of Respondent	Transmission System Operator

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority, contained in the draft Modification Report, that the Proposed Modification should be made?	Yes	P193 will better facilitate Applicable BSC Objective (d) – promoting efficiency in the implementation and administration of the balancing and settlement arrangements.
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the issue or defect identified in the Modification Proposal?	Yes	The P193 Modification Group reviewed the legal text at its final meeting on 18 th October and were satisfied that it properly implemented P193 within the BSC.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P193?	Yes	The changes to the BSC are minor and should be introduced as soon as possible.
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 plc</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	<i>None</i>
Non Parties represented	
Role of Respondent	<i>Supplier/ Generator/ TraderConsolidator/ Party Agent / Distributor</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority, contained in the draft Modification Report, that the Proposed Modification should be made?	Yes	For the reasons set out in the Modification Report
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the issue or defect identified in the Modification Proposal?	Yes	To the best of our knowledge
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P193?	Yes	
4.	Are there any further comments on P193 that you wish to make?	No	

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Respondent:	<i>John W Russell</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	<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 agree with the Panel's provisional recommendation to the Authority, contained in the draft Modification Report, that the Proposed Modification should be made?	Yes	We agree with the Panel's provisional recommendation that P193 Modification should be made. We believe that P193 would better facilitate the achievement of Applicable BSC Objective (d) 'Promoting efficiency in the implementation and administration of the balancing and settlement arrangements', when compared to the current Code baseline, thus leading Modifications to be progressed in a more efficient and timely manner.
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the issue or defect identified in the Modification Proposal?	Yes	We agree that the legal text appears to be appropriate.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P193?	Yes	We agree with the Panel's provisional recommendation that this Mod should be implemented 5 working days following an Authority decision if approved.
4.	Are there any further comments on P193 that you wish to make?	No	We have no further comments.

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Our Ref.
Your Ref.
18 November 2005

Dear Sirs,

Re: Modification Proposal P193 – Improved arrangements for Modification Proposals raised by the BSC Panel

Thank you for the opportunity of responding to this draft modification report considering Modification Proposal P193. British Gas Trading (BGT) agrees with the Panel's provisional recommendation that the Modification Proposal should be approved.

BGT believes the modification proposal will improve the efficiency of the change process by removing the current 1-month time lag between the request for a modification to be raised and the actual raising of the proposal.

BGT believes the legal text is fit for purpose and supports the proposed implementation date of 5 working days following an Authority decision.

If you have any questions regarding this response please contact me 01753 431137.

Yours faithfully

Mark Manley
Contract Manager

A *centrica* business

British Gas Trading Limited Registered in England No.3078711. Registered Office: Millstream, Maidenhead Road, Windsor, Berkshire SL4 5GD
www.gas.co.uk

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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	0	
Non Parties represented	0	
Role of Respondent	(Supplier/Generator/ Trader)	

Q	Question	Response	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority, contained in the draft Modification Report, that the Proposed Modification should be made?	Yes	EDF Energy support the Panel's provisional recommendation to the Authority that the proposed Modification should be made. In reducing the overall timescales for Panel Raised Modifications by one month this change will increase the efficiency of the process and bring it more in line with the current methodology that is in place for Party Raised Modifications.
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the issue or defect identified in the Modification Proposal?	Yes	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P193?	Yes	This is a straightforward change with a minimal implementation cost that will provide immediate benefits to Panel Raised Modifications.

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

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