

Responses from P183 Draft Report Consultation

Consultation Issued 11 March 2005

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	EDF Energy	P183_dMR_001	9	0
2.	Scottish Power	P183_dMR_002	6	0
3.	IMServ	P183_dMR_003	0	1
4.	RWE Npower	P183_dMR_004	10	0
5.	E.ON UK	P183_dMR_005	15	0
6.	British Gas Trading	P183_dMR_006	1	0
7.	Scottish and Southern Energy	P183_dMR_007	7	0

P183 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:	EDF Energy
No. of 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) Jade Power Generation Ltd; EDF Energy (West Burton Power) Ltd; EDF Energy plc; London Energy plc; Seeboard Energy Limited
No. of Non Parties Represented	0
Non Parties represented	N/A
Role of Respondent	Supplier / Generator / Trader

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P183 and the provisional recommendation to the Authority contained in the draft Modification Report that P183 should be made? Please give rationale.	Yes	Modification should improve parties' abilities to provide Change of Supplier reads within reasonable timeframes. This should, therefore, better facilitate objective (c).
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P183? Please give rationale.	No	We are concerned about the potential date of 2nd March 2006 if Authority decision is received between 1st June 2005 and 1st September 2005. This date does not match with potential changes required to MRA products to enable this modification. MRA changes are scheduled for 23rd February 2006 and as such we would prefer this modification to match that timeframe. Our understanding is that Elexon and Gemserv are using different views for implementation date. Elexon base this on the CVA release being the last Tuesday in February. This means SVA issues are released on following Thursday, which in this case is in March. However, Gemserv use last Thursday in February for their products. Given that product releases are

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			supposed to be synchronised we would request that Elexon base their schedule on the Thursday SVA release to tie into Gemserv release. The CVA release would then be on the Tuesday prior to this Thursday. This would then tie everything back to the same release dates for SVA and MRA products. It is possible that other modifications and CPs could be impacted but in order to minimise problems for parties we believe this change is necessary.
4.	Are there any further comments on P183 that you wish to make?	No	

Please send your responses by **12:00 on Tuesday 29 March 2005** to modification.consultations@elexon.co.uk and please entitle your email '**P183 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 Richard Hall on 020 7380 4033, email address richard.hall@elexon.co.uk.

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Respondent:	Man Kwong Liu (SAIC)
No. of Parties Represented	6
Parties Represented	<i>Please list all Parties responding on behalf of (including the respondent company if relevant).</i> Scottish Power UK plc; ScottishPower Energy Management Ltd.; ScottishPower Generation Ltd; ScottishPower Energy Retail Ltd.; SP Transmission Ltd; SP Manweb plc.
No. of Non Parties Represented	0
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 / other – please state¹)</i> Supplier / Generator / Trader / Consolidator / Exemptable Generator

Q	Question	Response ¹	Rationale
1.	Do you agree with the Panel's views on P183 and the provisional recommendation to the Authority contained in the draft Modification Report that P183 should be made? Please give rationale.	Yes	P183 affords Suppliers greater scope to improve the quality of meter readings and, therefore, the accuracy of Settlements. Recognising the Supplier Agreed Reads as Metered Data will serve to more closely align Supplier Billing with Settlements. Both dimensions contribute to better facilitate BSC Objective (c) – promoting competition.
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	The drafted legal text appears appropriate.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P183? Please give rationale.	Yes	ScottishPower will seek to implement the proposed modification at the earliest opportunity assuming all other dependent changes are in place.
4.	Are there any further comments on P183 that you wish to make?	No	

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

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Respondent:	<i>Name</i> Jenny Green
No. of Parties Represented	
Parties Represented	<i>Please list all Parties responding on behalf of (including the respondent company if relevant).</i> NHHDC NHHDA
No. of Non 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	Party Agent

Q	Question	Response <small>Error! Bookmark not defined.</small>	Rationale
1.	Do you agree with the Panel's views on P183 and the provisional recommendation to the Authority contained in the draft Modification Report that P183 should be made? Please give rationale.	No	As before
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	As before
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P183? Please give rationale.	N/A	As before
4.	Are there any further comments on P183 that you wish to make?	No	

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Respondent:	Louisa Stuart-Smith
No. of Parties Represented	10
Parties Represented	RWE Trading GmbH, RWE Npower plc, Npower Co-gen Ltd, Npower Co-gen Trading Ltd, Npower Direct Ltd, Npower Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd
No. of Non Parties Represented	0
Non Parties represented	N/A
Role of Respondent	Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P183 and the provisional recommendation to the Authority contained in the draft Modification Report that P183 should be made? Please give rationale.	Yes	This modification will enable other changes in the MRA to attempt to ensure that the CoS process works more effectively and efficiently than at present.
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Qualified Yes	Clarification is needed of what could constitute “reasonable grounds” in the proposed new paragraph 2.3.5 in section S – e.g. could this include inconsistency with a possibly erroneous estimate provided by the Old Supplier? It would seem much more appropriate to pass such customer own readings to the NHHDC so that they could be validated against previous data held by this Accredited Agent. Otherwise, this could result in accurate customer own readings being kept from the NHHDC and therefore excluded from Settlement, to the detriment of future Settlement data quality and customer billing accuracy.

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3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P183? Please give rationale.	Qualified Yes	<p>There appears to be no issue with the 3rd November 2005 implementation date should the Authority make a decision on or before 1st June 2005.</p> <p>Query over the 2nd suggested BSC implementation date of March 3rd 2006 as this could be 8 days after the associated MRA change should the MRA change be implemented on 23rd February 2006. This would result in the mechanisms being in place in the MRA before the change is officially in place in the BSC.</p> <p>We would like to see the implementation dates aligned to ensure consistency.</p>
4.	Are there any further comments on P183 that you wish to make?	Yes	<p>There are potential implications for the scope of BSC Audit and Performance Assurance monitoring requirements, to ensure that there is not inappropriate or excessive use of Supplier estimates, which need to be considered if this Modification is approved.</p>

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Respondent:	<i>Alexandra Crump</i>
No. of Parties Represented	15
Parties Represented	E.ON UK plc; Powergen Retail Ltd; Citigen (London) Ltd; Cottam Development Centre Ltd; Enizade Ltd; E.ON UK Drakelow Ltd; E.ON UK High Marnham Ltd; E.ON UK Ironbridge Ltd; Midlands Gas Ltd; Ownlabel Energy Ltd; Severn Trent Energy Ltd; TXU Europe (AHG) Ltd; TXU Europe (AHGD) Ltd; TXU Europe (AH Online) Ltd; Western Gas Ltd.
No. of Non Parties Represented	
Non Parties represented	
Role of Respondent	Supplier / Generator

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1.	Do you agree with the Panel's views on P183 and the provisional recommendation to the Authority contained in the draft Modification Report that P183 should be made? Please give rationale.	YES	P183 will enhance the overall robustness of the Change of Supplier mechanism and contribute to an improvement of the quality of data entering Settlement. It will also better facilitate Applicable BSC Objective c.
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	YES	The addition to Section S of 2.3.5 will remove the requirement on Suppliers to send reads which are manifestly inaccurate or erroneous thereby improving Settlement data quality. In addition the amendment made to Annex S-2 will permit Supplier Agreed Readings to be incorporated into the definition of Metered Data.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P183? Please give rationale.	YES	The proposed implementation dates are acceptable.
4.	Are there any further comments on P183 that you wish to make?	NO	

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Respondent:	<i>Claire Walsh</i>
No. of Parties Represented	
Parties Represented	<i>BGT</i>
No. of Non Parties Represented	
Non Parties represented	
Role of Respondent	<i>Supplier</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P183 and the provisional recommendation to the Authority contained in the draft Modification Report that P183 should be made? Please give rationale.	Yes	We fully support this modification as it will enable greater efficiency, accuracy and timeliness during the CoS process.
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P183? Please give rationale.	Yes	
4.	Are there any further comments on P183 that you wish to make?	Yes	Aligned with current CTP principles, this proposed facility is mandatory for the domestic market and subject to bilateral within the non-domestic market. This distinction should be referenced within (preferably) the legal text or alternatively within the Code Subsidiary documents. Notwithstanding that changes are being incorporated within the Master Registration Agreement we believe that this distinction should be made in both Governances.

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Respondent:	John Sykes – Scottish and Southern Energy
No. of Parties Represented	7
Parties Represented	<i>This response is sent on behalf of Scottish and Southern Energy, Southern Electric Power Distribution Ltd, Scottish Hydro Electric Power Distribution Ltd, SSE Generation Ltd, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd.</i>
No. of Non Parties Represented	0
Non Parties represented	
Role of Respondent	<i>Supplier/Generator/ Trader / LDSO</i>

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1.	Do you agree with the Panel's views on P183 and the provisional recommendation to the Authority contained in the draft Modification Report that P183 should be made? Please give rationale.	Yes	
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	To the best of our knowledge
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P183? Please give rationale.	Yes	
4.	Are there any further comments on P183 that you wish to make?	No	

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