

Responses from P182 Draft Report Consultation

Consultation Issued 20 July 2005

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	Utility Link Ltd	P182_dMR_001	1	0
2.	Good Energy Ltd	P182_dMR_002	1	0
3.	EDF Energy plc	P182_dMR_003	9	0
4.	Metering Services	P182_dMR_004	0	1
5.	Gaz de France Marketing Ltd	P182_dMR_005	0	1
6.	Imserv Europe Ltd	P182_dMR_006	2	0
7.	Scottish & Southern Energy	P182_dMR_007	5	0
8.	Scottish Power	P182_dMR_008	6	0
9.	E.ON UK	P182_dMR_009	15	0
10.	Total Gas and Power Ltd	P182_dMR_010	1	0
11.	RWE npower	P182_dMR_011	10	0
12.	United Utilities Electricity	P182_dMR_012	1	0
13.	British Energy	P182_dMR_013	5	0
14.	British Gas	P182_dMR_014	1	0
15.	CE Electric UK	P182_dMR_015	2	0

## P182 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.

<b>Respondent:</b>	<i>Chris Welby</i>
<b>No. of Parties Represented</b>	1
<b>Parties Represented</b>	Utility Link Ltd
<b>No. of Non Parties Represented</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Supplier</i>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Proposed Modification should not be made?	No	The incremental cost of achieving 97% as opposed to 95.5% are high and diverting limited resources away from meeting Customer requirements for accurate/lower bills etc. The Panel is taking a narrow settlements view and not an industry view or the impact on customers.
2.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Alternative Modification should not be made?	No	As above
3.	Do you agree with the Panel's view that Alternative Modification P182 better facilitates the Applicable BSC Objectives when compared with Proposed Modification P182? Please note this indicates Panel support for a Calendar Day implementation of P182.	Yes / No	Neutral on this issue
4.	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?	Yes / No	No comment
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P182?	Yes / No	No comment

Q	Question	Response	Rationale
6.	Are there any further comments on P182 that you wish to make?	Yes	<p>New/ small Supplier without an inherited 'inert' customer base find achieving 97% a significant drain on resources, as any company in growth mode inherits problems from previous Suppliers, and they are often more difficult to fix because there has been a change of Supplier.</p> <p>The cost of fixing a complex problem can be several man days, this cost will eventually be borne by the end consumer. Who would rather money was spent on billing issues etc.</p> <p>The Panel should recognise that the industry is primarily about providing Customer service, not about equability of settlements to the 'n th' degree.</p>

Please send your responses by **12:00 on Wednesday 3 August 2005** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P182 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 Dena Harris on 020 7380 4364, email address [dena.harris@elexon.co.uk](mailto:dena.harris@elexon.co.uk).

## P182 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.

<b>Respondent:</b>	<i>Alice Waltham, Good Energy Ltd</i>
<b>No. of Parties Represented</b>	1
<b>Parties Represented</b>	<i>Good Energy Ltd</i>
<b>No. of Non Parties Represented</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Supplier</i>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Proposed Modification should not be made?	No	The incremental cost in achieving 97% rather than 95.5% is high. This is particularly true for small suppliers who have less negotiating power with agents, and who have less resource available. We feel this resource would be better spent meeting customer demands for lower and more timely and accurate bills.
2.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Alternative Modification should not be made?	No	As above
3.	Do you agree with the Panel's view that Alternative Modification P182 better facilitates the Applicable BSC Objectives when compared with Proposed Modification P182? Please note this indicates Panel support for a Calendar Day implementation of P182.	Yes / No	No comment
4.	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?	Yes / No	No comment
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P182?	Yes / No	No comment

Q	Question	Response	Rationale
6.	Are there any further comments on P182 that you wish to make?	Yes	Small and rapidly growing suppliers have a much higher proportionate cost meeting the current 97% Standard. Small suppliers have a higher percentage of customers who have been through a change of Supplier process in the last two years. Problems inherited from previous Suppliers become more difficult to fix after a change of Supplier and resolving complex problems can be very resource intensive and take several man days to fix. We feel that this resource is better spent on resolving billing issues and providing better service to the consumer.

Please send your responses by **12:00 on Wednesday 3 August 2005** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P182 **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 Dena Harris on 020 7380 4364, email address [dena.harris@elexon.co.uk](mailto:dena.harris@elexon.co.uk).

## P182 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.

<b>Respondent:</b>	EDF Energy plc
<b>No. of Parties Represented</b>	9
<b>Parties Represented</b>	EDF Energy Networks (EPN) plc; EDF Energy Networks (LPN) plc EDF Energy Networks (SPN) plc; EDF Energy (Sutton Bridge Power) Jade Power Generation Ltd; EDF Energy (West Burton Power) Ltd; EDF Energy plc; London Energy plc; Seeboard Energy Limited
<b>No. of Non Parties Represented</b>	0
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	Supplier / Generator / Trader

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Proposed Modification should not be made?	Yes	Evidence does not support changing current methodology. Potential reductions in data quality and their long-term effects have not been fully considered. It is possible, for example, that such problems could lead to problems in customer transfers.
2.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Alternative Modification should not be made?	Yes	Evidence does not support changing current methodology. Potential reductions in data quality and their long-term effects have not been fully considered. It is possible, for example, that such problems could lead to problems in customer transfers.
3.	Do you agree with the Panel's view that Alternative Modification P182 better facilitates the Applicable BSC Objectives when compared with Proposed Modification P182? Please note this indicates Panel support for a Calendar Day implementation of P182.	Yes	However, neither of these would seem to better facilitate BSC objectives than current approach.
4.	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?	Yes	
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P182?	Yes	
6.	Are there any further comments on P182 that you wish to make?	No	

Please send your responses by **12:00 on Wednesday 3 August 2005** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P182 **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 Dena Harris on 020 7380 4364, email address [dena.harris@elexon.co.uk](mailto:dena.harris@elexon.co.uk).

## P182 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.

<b>Respondent:</b>	<i>Rob Smith Regulatory Compliance Manager- Metering Services</i>
<b>No. of Parties Represented</b>	
<b>Parties Represented</b>	
<b>No. of Non Parties Represented</b>	
<b>Non Parties represented</b>	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
<b>Role of Respondent</b>	<i>Party Agent</i>

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Proposed Modification should not be made?	No	The proposal met the requirements that it set out to achieve. Improvements in data quality were not part of the scope of the proposal. Since RF performance is only one indicator of data quality, it should not override the intention of equitability on defined and understood rationale.
2.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Alternative Modification should not be made?	No	See comments to 1 above.
3.	Do you agree with the Panel's view that Alternative Modification P182 better facilitates the Applicable BSC Objectives when compared with Proposed Modification P182? Please note this indicates Panel support for a Calendar Day implementation of P182.	Yes	Visibility of performance would be enhanced by this approach, which would be an incentive its improvement because it would be identifiable earlier than the current settlement day calendar allows.
4.	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?	Yes	
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P182?	Yes	
6.	Are there any further comments on P182 that you wish to make?	No	

Please send your responses by **12:00 on Wednesday 3 August 2005** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P182 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 Dena Harris on 020 7380 4364, email address [dena.harris@elexon.co.uk](mailto:dena.harris@elexon.co.uk).

## P182 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.

<b>Respondent:</b>	<i>Gaz de France Marketing Ltd</i>
<b>No. of Parties Represented</b>	
<b>Parties Represented</b>	
<b>No. of Non Parties Represented</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Supplier/Generator</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Proposed Modification should not be made?	Yes	The 97% target has been reached by many Suppliers at various times and should be retained in order to ensure improved data quality entering Settlement in order to improve our chances of attaining an unqualified audit opinion in future
2.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Alternative Modification should not be made?	Yes	See answer to question 1 above
3.	Do you agree with the Panel's view that Alternative Modification P182 better facilitates the Applicable BSC Objectives when compared with Proposed Modification P182? Please note this indicates Panel support for a Calendar Day implementation of P182.	No	I believe the case has not been proven for change at this time
4.	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?	Yes	See answer to question 3 above
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P182?	Yes	See answer to question 3 above
6.	Are there any further comments on P182 that you wish to make?	Yes	This modification proposal and its alternative do not improve upon the current BSC objectives

Please send your responses by **12:00 on Wednesday 3 August 2005** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P182 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 Dena Harris on 020 7380 4364, email address [dena.harris@elexon.co.uk](mailto:dena.harris@elexon.co.uk).

## P182 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.

<b>Respondent:</b>	<i>Stephen Johnson, Imserv Europe Ltd</i>
<b>No. of Parties Represented</b>	2
<b>Parties Represented</b>	<b>NHHDC NHHDA (SEEB &amp; UKDC MPIDs)</b>
<b>No. of Non Parties Represented</b>	0
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Party Agent</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Proposed Modification should not be made?	Yes	
2.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Alternative Modification should not be made?	No	Previous comments made in support of the Alternative Modification still stand
3.	Do you agree with the Panel's view that Alternative Modification P182 better facilitates the Applicable BSC Objectives when compared with Proposed Modification P182? Please note this indicates Panel support for a Calendar Day implementation of P182.	Yes	
4.	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?	Yes	
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P182?	Yes	
6.	Are there any further comments on P182 that you wish to make?	No	

Please send your responses by **12:00 on Wednesday 3 August 2005** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P182 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 Dena Harris on 020 7380 4364, email address [dena.harris@elexon.co.uk](mailto:dena.harris@elexon.co.uk).

## P182 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.

<b>Respondent:</b>	<i>John Sykes - Scottish and Southern Energy</i>
<b>No. of Parties Represented</b>	5
<b>Parties Represented</b>	<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>
<b>No. of Non Parties Represented</b>	<i>None</i>
<b>Non Parties represented</b>	<i>None</i>
<b>Role of Respondent</b>	<i>Supplier/Generator/ Trader / Party Agent / LDSO</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Proposed Modification should not be made?	Yes	
2.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Alternative Modification should not be made?	Yes	
3.	Do you agree with the Panel's view that Alternative Modification P182 better facilitates the Applicable BSC Objectives when compared with Proposed Modification P182? Please note this indicates Panel support for a Calendar Day implementation of P182.	Yes	There is adequate lead in time with Calendar Day implementation. Settlement Day implementation would mean an unnecessarily long lead which would lose its impact.
4.	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?	Yes	As far as can be ascertained.
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P182?	Yes	
6.	Are there any further comments on P182 that you wish to make?	Yes	There are three points that have emerged from this Modification:- <ul style="list-style-type: none"> <li>• A sound and acceptable way of increasing focus (i.e. splitting the measure by Profile Class group) had to be rejected (rightly) on the grounds of</li> </ul>

Q	Question	Response Error! Bookmark not defined.	Rationale
			<p>uneconomic cost of changes to the PARMS system. This must pose questions about the suitability of the PARMS software.</p> <ul style="list-style-type: none"> <li>• The 97% standard is NOT about the equitability of settlements, and that a figure down to 94% appears to be acceptable in this respect.</li> <li>• It is a pity that a more modest reduction was not chosen, say to 96.5%. The proposed 1.5% drop in the standard represents a significant decrease, in fact, it increases the EAC energy allowable by 50%. This is unacceptable for data quality purposes in the current industry climate. However, the industry is starting to perform better and become more aware of its responsibilities. A more modest decrease of 0.5% to 96.5% would have had the dual effect of breaking the "97% myth", yet committing the industry to a still challenging data quality objective. A great opportunity has been missed.</li> </ul>

Please send your responses by **12:00 on Wednesday 3 August 2005** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P182 **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 Dena Harris on 020 7380 4364, email address [dena.harris@elexon.co.uk](mailto:dena.harris@elexon.co.uk).

## P182 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.

<b>Respondent:</b>	<i>Timothy Roberts (Scottish Power)</i>
<b>No. of Parties Represented</b>	6
<b>Parties Represented</b>	Scottish Power UK PLC; Scottish Power Energy Management Ltd; Scottish Power Generation Ltd; Scottish Power Energy Retail Ltd; SP Transmission Ltd; SP Manweb PLC.
<b>No. of Non Parties Represented</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent /</i>

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Proposed Modification should not be made?	Yes	Scottish Power agrees with the Panel in rejecting the proposed modification only as far as this proposal includes implementation by Settlement Date. This would mean a delay in what we see as a perceived benefit to the Industry by at least 14 months following the Authority's decision.

Q	Question	Response	Rationale
2.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Alternative Modification should not be made?	No	<p>The Panel has stated that this Alt Modification should be rejected mainly for reasons of data quality; no perceived benefit in reducing the target &amp; the fact that some Suppliers can reach and want to reach 97%. However, we believe that this does not reflect the conclusions that can be reached from reviewing the considerable amount of data (from over 4.5 million MPANs) produced by the Mod Group. From these results it can be seen that:</p> <ul style="list-style-type: none"> <li>• Suppliers are happy with the equitability of Settlements data.</li> <li>• The movement between EACs and AAs from the current Industry average of 94.5% to 97% is minimal.</li> <li>• There is no issue with the Age of EACs within the Settlement window of 14 mths.</li> <li>• The target of 97% was in part based on OS7, which was based on % of customer reads rather than as a % of volume as currently.</li> </ul> <p>Some parties have indicated that by simply reducing the target, standards will fall, this argument seems illogical when considering the proposed standard is HIGHER than the current Industry average.</p> <p>Concerns over data quality do not appear to be supported by the data provided. In addition, issues over data quality are already being addressed on a number of fronts e.g. Customer Transfer Programme; Issue 14; etc As regards benefits we believe this Mod would save Suppliers &amp; ELEXON the costs associated with trying to achieve and being monitored against a standard that has no foundation. From our own analysis (performed by a 3<sup>rd</sup> Party) provided to ELEXON, we are convinced that these costs ARE significant, and we remain disappointed that few Suppliers have undertaken this exercise. Any reduction in costs has to be good for consumers. Moreover, we believe by having a more realistic target the PAB will have more authority, as currently ALL Suppliers are failing to achieve the current target in the majority of GSP Groups – thus surely hindering PABs ability to take action/ apply pressure to individual Suppliers.</p> <p>The current target has a credibility issue in that it has no scientific basis and after 7 years ALL Suppliers are still failing to achieve it as stated above. The revised target is based on extensive data analysis and is an improvement on what the Industry currently achieves. We remain convinced that this Modification is good for all Suppliers (large and small) for Customers and the Industry as a whole.</p>

Q	Question	Response	Rationale
3.	Do you agree with the Panel's view that Alternative Modification P182 better facilitates the Applicable BSC Objectives when compared with Proposed Modification P182? Please note this indicates Panel support for a Calendar Day implementation of P182.	Yes	Because both the revised target and calendar day implementation have benefits to Suppliers when compared to a Settlement date implementation some 14 months later, thus aiding BSC Objective C (by reducing costs, and as the current target may be seen a deterrent to entry) and Objective D (which by having a more realistic target gives PAB more authority)
4.	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?	Yes	Legal text seems fine, providing it covers both Proposed and Alternative Modifications.
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P182?	Yes	We agree entirely with the recommendation concerning an implementation based on a calendar day basis of the first day of the first calendar month that commences at least 20 working days after the Authority decision. The earlier the implementation the greater the benefit to Suppliers and to PAB to enforce a more realistic target.
6.	Are there any further comments on P182 that you wish to make?	Yes	A disappointing aspect of the Modification process was the costs associated with changes to PARMS. Given that we for one believed that the new PARMS system would be more flexible to change, the costs for splitting the standard between Profile Classes 1-4 and 5-8 seem extremely expensive at around £550K + implementation costs of £100K. As a result the option to split the targets was seen as cost prohibitive, particularly as one of the major aims of the Mod is to reduce costs.  It also raises concerns over changes to the PARMS system going forward which we believe need to be addressed by ELEXON with Logica when consideration is given to future modifications.

Please send your responses by **12:00 on Wednesday 3 August 2005** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P182 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 Dena Harris on 020 7380 4364, email address [dena.harris@elexon.co.uk](mailto:dena.harris@elexon.co.uk).

## P182 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.

<b>Respondent:</b>	Afroze Miah
<b>No. of Parties Represented</b>	15
<b>Parties Represented</b>	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.
<b>Role of Respondent</b>	Supplier / Generator
<b>Respondent:</b>	Afroze Miah
<b>No. of Parties Represented</b>	15

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Proposed Modification should not be made?	Yes	A calendar day implementation is preferable as the lead time would be much shorter.

Q	Question	Response Error! Bookmark not defined.	Rationale
2.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Alternative Modification should not be made?	No	<p>We note that a number of reasons were given by the BSC Panel. Our comments on these are as follows:</p> <p><b>The case for change has not been made. It is not certain that P182 will improve matters in the industry.</b></p> <p>Disagree. The case has been made. Suppliers are spending increasing amounts of money to achieve a target that has been proven to be unachievable by the vast majority of them. This expenditure is therefore being wasted and it is customers, especially those from whom we can obtain a meter read, that are ending up paying for these activities and paying for those for whom we cannot obtain a meter read.</p> <p>We are also not sure what is meant by 'it is not certain that P182 will improve matters in the industry'. If what they mean by industry is the BSC then we disagree as the analysis undertaken by Elexon has been very robust and has indicated very little if any degradation in settlements. If by industry the BSC Panel means issues outside of the BSC then we believe that consideration of such issues is outside the remit of the Panel. We would like to remind them that they only need to consider the Relevant Applicable BSC Objectives when deciding on modifications.</p> <p><b>From consultation responses and Group opinions, it appears that enough Suppliers are content with the status quo</b></p> <p>This may be the case but the majority view was to support the alternative modification and discussions at the BSC Panel should have been framed with this in mind. After all, what is the point of a majority view if it is ignored in favour of a minority? We might as well not bother having a recommendation if that is the position that the BSC Panel plans to take.</p> <p><b>Some Suppliers achieve 97%</b></p> <p>This is the exception to the rule. There are always exceptions to any problem or issue in life and just because some suppliers are achieving the 97% does not mean all suppliers can. Looking at peer comparison data for May 2005 only 1 in 10 suppliers hit the 97% target on average across all GSP groups. What are the specific characteristics of these suppliers? Are these different from other suppliers that would explain their better performance? Can any information be provided which would explain how these suppliers can attain this level?</p>

Q	Question	Response Error! Bookmark not defined.	Rationale
2			<p><b>The exclusion of the Profile Class split for cost reasons is understandable, however it does remove one of the main benefits of P182</b></p> <p>This should not be a reason for rejecting the Alternative modification. Costs must always be considered when deciding whether a solution is desirable. If prohibitive costs mean a different or lesser solution (that still does the job required) then that is the most sensible approach to take. The BSC Panel should be more concerned about the nature of PARMs if this is the level of costs to be expected when changes are made to it.</p> <p><b>Reducing the RF NHH SP08a target would not benefit the audit issues and other problems in Settlement</b></p> <p>There is no evidence for this assertion. The Audit threshold has been increased five-fold to 0.5% and this should result in a reduction of the materiality issues previously raised. Other issues such as high AAs / EACs and D095s are not related to P182.</p> <p><b>Reducing the RF target would be detrimental to consumers and this is especially relevant when the Ofgem response (reference 11) to the energywatch super complaint (reference 10) is considered</b></p> <p>We would like to remind the BSC Panel that such issues are outside the remit of the Panel. What the impact on consumers or the relevance of P182 is to the energywatch super complaint are matters that reside outside of the Panel. The BSC Panel need only focus on the Relevant Applicable BSC Objectives when deciding on this modification and we are extremely disappointed that they have strayed away from this principle.</p> <p><b>Reducing the RF target may save costs but would also reduce data quality – the cost versus quality argument has not been proven</b></p> <p>This is incorrect. Elexon's analysis has indicated that there are very little if any data quality issues surrounding the reduction of the performance measure from 97% to 95.5%. Furthermore, if there are any minor data quality issues the VASMG agreed that this was not important as long as settlements was <u>equitable</u> to suppliers. This was further confirmed in Elexon's report on the BSC Review last year.</p>

Q	Question	Response Error! Bookmark not defined.	Rationale
2			<p><b>The setting of this target cannot be scientific so this new target can not necessarily be more robust than the old</b></p> <p>Incorrect. This measure is more scientific than the old method. Substantial analysis was carried out by Elexon on this and the VASMG believed that the new performance measures were more robust than what was there previously. Furthermore the new measure is much more strongly linked to the new BSC Audit threshold level of 0.5% recently agreed by the BSC Panel. E.ON UK had actually supported a direct link to the 0.5% threshold but there was no consensus on the VASMG and it was then agreed to have a compromise based on 0.55% (this compromise was also supported by those who voted against P182!).</p> <p><b>The costs may decrease for Suppliers as a result of P182 but will not necessarily reduce for other parties (e.g. Customers / LDSOs)</b></p> <p>There is no evidence for this. Where are these costs on customers and LDSOs? None have been provided therefore the BSC Panel are speculating again. There is evidence of increased costs on suppliers to achieve the current targets which must mean increased pass through costs to customers. So if there is a cost on customers then it is because of the currently untenable level of 97%!</p> <p><b>Lowering the target sends the wrong message out to industry, at this stage.</b></p> <p>Again the BSC Panel is straying into territory that is not relevant to their decision-making process. We would like to remind the BSC Panel that such issues are outside the remit of the Panel. What messages are sent to industry by lowering the target is not for the consideration of the BSC Panel. The BSC Panel need only focus on the Relevant Applicable BSC Objectives when deciding on this modification and we are extremely disappointed that they have strayed away from this principle.</p> <p><b>One Panel member calculated that if a 0.4% uncertainty was inserted into the methodology, the result would be a 97% target.</b></p> <p>We preferred 0.5% as it would have linked to the recently agreed BSC Audit threshold. That seems to be preferable than 0.4% or 0.55%. If the Panel believes 0.5% is a sensible figure then they cannot but agree to a new performance measure based on this. If this is not the case then it brings 0.5% into disrepute. In fact, even 0.55% is closer to the new Audit threshold than 0.4%.</p>

Q	Question	Response Error! Bookmark not defined.	Rationale
3.	Do you agree with the Panel's view that Alternative Modification P182 better facilitates the Applicable BSC Objectives when compared with Proposed Modification P182? Please note this indicates Panel support for a Calendar Day implementation of P182.	Yes	A calendar day implementation is preferable as the lead time would be much shorter.
4.	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?	Yes	
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P182?	Yes	
6.	Are there any further comments on P182 that you wish to make?	Yes	<p>We are concerned that the BSC Panel has used poor arguments to reject this modification and have basically ignored all the hard work and analyses carried out by Elexon which have been supported by the majority of the VASMG (including many who subsequently rejected the modification!). This does not seem to be right and is very worrying.</p> <p>We also note that the BSC Panel have been unnecessarily influenced by outside concerns and perceptions of what the industry or certain external organisations may think of this modification if it is approved. This would seem to be in contradiction of any terms of reference of the BSC Panel. Our understanding is that the Panel should only refer to the Relevant Applicable BSC Objectives when deciding on BSC modifications. If that is the case we would like to know why the BSC Panel is looking at issues outside of the BSC. If that is not the case we would also be grateful if Elexon and the BSC Panel can spell out to us exactly what guidance they follow when determining modifications to the BSC.</p>

Please send your responses by **12:00 on Wednesday 3 August 2005** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email **P182 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 Dena Harris on 020 7380 4364, email address [dena.harris@elexon.co.uk](mailto:dena.harris@elexon.co.uk).

## P182 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.

<b>Respondent:</b>	<i>Gareth Evans – Total Gas and Power Ltd</i>
<b>No. of Parties Represented</b>	1
<b>Parties Represented</b>	<i>Total Gas and Power Ltd</i>
<b>No. of Non Parties Represented</b>	0
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>(Supplier/ Trader / Party Agent)</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Proposed Modification should not be made?	<b>No</b>	Both modifications represent an attempt to realign the RF percentage targets with a realistic level of performance by Suppliers. The revised target is above the current industry average, so it will ensure that suppliers continue to input the same level of resource to maintain current standards. It prevents Suppliers from being unduly penalised for the actions of its customers however. It is customers who ultimately determine the right of access, and so the success rate of meter readings.
2.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Alternative Modification should not be made?	<b>No</b>	Regarding benefits to performance, this revised target removes the situation where all suppliers are failing to hit targets and enables PAB to concentrate on true offenders. Given this benefit, and the efficiency savings from reduced supplier charges, we believe both modifications facilitate objective (c).

Q	Question	Response Error! Bookmark not defined.	Rationale
3.	Do you agree with the Panel's view that Alternative Modification P182 better facilitates the Applicable BSC Objectives when compared with Proposed Modification P182? Please note this indicates Panel support for a Calendar Day implementation of P182.	<b>Yes</b>	As the proposed implementation of this modification would be Nov 05 at the earliest, that would seem sufficient lead time to enable Suppliers to adjust their performance to reflect the new targets if a calendar date implementation period is chosen. A settlement date would effectively mean a 14 month timelag (after the implementation of the modification) before the new standards take effect. This would effectively mean an implementation date of Jan 2007, which will remove any benefits this modification may have.
4.	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?	<b>Yes</b>	
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P182?	<b>Yes</b>	The lack of any system development lends itself to an early deployment.
6.	Are there any further comments on P182 that you wish to make?	<b>No</b>	

Please send your responses by **12:00 on Wednesday 3 August 2005** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P182 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 Dena Harris on 020 7380 4364, email address [dena.harris@elexon.co.uk](mailto:dena.harris@elexon.co.uk).

## P182 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.

<b>Respondent:</b>	<i>Louisa Stuart Smith, RWE npower</i>
<b>No. of Parties Represented</b>	10
<b>Parties Represented</b>	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
<b>No. of Non Parties Represented</b>	0
<b>Non Parties represented</b>	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
<b>Role of Respondent</b>	<i>(Supplier/Generator/ Trader<sup>1</sup>)</i>

Q	Question	Response <sup>1</sup>	Rationale
1.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Proposed Modification should not be made?	Yes	<p>Several suppliers already achieve the standard in some GSP groups. There is evidence that the present standard improves the accuracy of settlement data and benefits to suppliers and customers in terms of better data quality and more accuracy in settlements.</p> <p>The Proposed Modification reduces the performance standard, but does not put in place alternative measures to maintain and improve data quality.</p> <p>The costs of the proposal outweigh any benefits the Modification Group has identified.</p>
2.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Alternative Modification should not be made?	Yes	See the rationale to question 1

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

Q	Question	Response <sup>1</sup>	Rationale
3.	Do you agree with the Panel's view that Alternative Modification P182 better facilitates the Applicable BSC Objectives when compared with Proposed Modification P182? Please note this indicates Panel support for a Calendar Day implementation of P182.	No	Although the electricity supply industry would realise any benefits of the Modification earlier with a Calendar Day implementation it could have a distorting effect on suppliers' resources. A Settlement Day implementation would be preferable as suppliers and their agents would have more time to amend their systems accordingly.
4.	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?	Yes	Regardless of the fact that we do not support the Proposed Modification or the Alternative the proposed text meets the requirement of the Proposed Modification.
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P182?	No	See the answer to question 3
6.	Are there any further comments on P182 that you wish to make?	No	

Please send your responses by **12:00 on Wednesday 3 August 2005** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P182 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 Dena Harris on 020 7380 4364, email address [dena.harris@elexon.co.uk](mailto:dena.harris@elexon.co.uk).

## P182 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.

<b>Respondent:</b>	<i>Frank Welsh: - United Utilities Electricity</i>
<b>No. of Parties Represented</b>	One
<b>Parties Represented</b>	<i>United Utilities Electricity</i>
<b>No. of Non Parties Represented</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Distribution System Operator</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Proposed Modification should not be made?	Yes	Neither the proposed modification nor alternative modification, as detailed under P182 Consultation, better facilitate relevant applicable BSC objectives.
2.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Alternative Modification should not be made?	Yes	As detailed above.
3.	Do you agree with the Panel's view that Alternative Modification P182 better facilitates the Applicable BSC Objectives when compared with Proposed Modification P182? Please note this indicates Panel support for a Calendar Day implementation of P182.	No	United Utilities Electricity supports neither modification proposal nor any views contained within them.
4.	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?	No	United Utilities Electricity prefers to continue with the legislation as currently presented within BSC documentation.
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P182?	No	United Utilities Electricity doesn't support any modifications to existing procedures and practices.

Q	Question	Response Error! Bookmark not defined.	Rationale
6.	Are there any further comments on P182 that you wish to make?	Yes	<ul style="list-style-type: none"> <li>▪ United Utilities Electricity feels it is appropriate to continue with 97% target for Final Reconciliation's as not all Suppliers are achieving this currently through Settlements as a whole;</li> <li>▪ United Utilities Electricity feels that Suppliers should be requested to achieve 97% through the RF route, as from an individual perspective, our GSPG shows that the Supplier community as a whole is currently failing to achieve this target.</li> </ul>

Please send your responses by **12:00 on Wednesday 3 August 2005** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P182 **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 Dena Harris on 020 7380 4364, email address [dena.harris@elexon.co.uk](mailto:dena.harris@elexon.co.uk).

## P182 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.

<b>Respondent:</b>	<i>Martin Mate</i>
<b>No. of Parties Represented</b>	5
<b>Parties Represented</b>	<i>British Energy Power &amp; Energy Trading Ltd, British Energy Generation Ltd, Eggborough Power Ltd, British Energy Generation (UK) Ltd, British Energy Direct Ltd</i>
<b>No. of Non Parties Represented</b>	-
<b>Non Parties represented</b>	-
<b>Role of Respondent</b>	<i>Supplier/Generator/Trader/Consolidator/Exemptable Generator/Party Agent</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Proposed Modification should not be made?	Yes	We agree with the Panel's recommendation that proposed modification P182 should not be made. In particular: <ul style="list-style-type: none"> <li>The exclusion of Profile Class split removes one of the main benefits of P182;</li> <li>Lowering the target sends the wrong message to industry, at this stage.</li> </ul>
2.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Alternative Modification should not be made?	Yes	We agree with the Panel's recommendation that the alternative modification P182 should not be made, for the reasons given above.
3.	Do you agree with the Panel's view that Alternative Modification P182 better facilitates the Applicable BSC Objectives when compared with Proposed Modification P182? Please note this indicates Panel support for a Calendar Day implementation of P182.	Yes	Calendar day implementation would be the simpler and more efficient option. However, calendar day implementation is effectively retrospective, and due to the significant fiscal impact of the change, more notice should be provided.
4.	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?	Yes / No	The existing legal text is at best unclear about exactly which runs are used in the measurement of performance and determination of charges and their reallocation. The proposed legal text does not make this situation any worse, and is satisfactory in the context solely of the specific modification proposed.

Q	Question	Response <small>Error! Bookmark not defined.</small>	Rationale
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P182?	Yes / No	Yes for settlement day implementation. We consider that the alternative proposal should have a longer notice period, given that calendar day implementation effectively makes the change retrospective in respect of individual settlement days.
6.	Are there any further comments on P182 that you wish to make?	Yes / No	<p>P182 has raised some significant issues in relation to EAC/AA volatility within individual profile class groupings. Small suppliers operating in the 03-08 groups will encounter greater volatility than 01-02. By rejecting the proposed separation, large domestic suppliers will still be able to absorb the volatility of the non-domestic market.</p> <p>This element was removed from P182 on the grounds of costs to implement (PARMS changes required). It is surprising/concerning that the costs of this change were so high. Follow up should be made with the PARMS service provider to better understand these costs and work towards a situation where changes can be made without major financial impact on the industry.</p> <p>Although the P182 modification group excluded age of EAC from the scope of the modification, further analysis in this area could identify a significant in NHH Data Quality. Specific work on the age of last valid actual reading is recommended.</p>

Please send your responses by **12:00 on Wednesday 3 August 2005** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P182 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 Dena Harris on 020 7380 4364, email address [dena.harris@elexon.co.uk](mailto:dena.harris@elexon.co.uk).

## P182 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.

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

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Proposed Modification should not be made?	Yes	
2.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Alternative Modification should not be made?	No	We firmly believe that the data analysis undertaken within the P182 Modification process enabled a mathematical approach to be adopted to identify an equitable and tolerably accurate target for RF AA performance. The analysis also provided the Industry with comfort that the accuracy of the residual EAC's at RF and the ensuing deduction that overall the combined EAC & AA portfolio is relatively accurate. We are disappointed that in isolation this standard continues to be targeted as the root cause of audit, data quality and Customer billing issues and believe that subject to a new and agreed RF AA target, the focus on the material errors negatively affecting Settlement would be re-prioritised. We continue in our support of the Alternative P182 Modification.
3.	Do you agree with the Panel's view that Alternative Modification P182 better facilitates the Applicable BSC Objectives when compared with Proposed Modification P182? Please note this indicates Panel support for a Calendar Day implementation of P182.	Yes	

Q	Question	Response Error! Bookmark not defined.	Rationale
4.	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?	Yes	
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P182?	Yes	
6.	Are there any further comments on P182 that you wish to make?	No	

Please send your responses by **12:00 on Wednesday 3 August 2005** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P182 **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 Dena Harris on 020 7380 4364, email address [dena.harris@elexon.co.uk](mailto:dena.harris@elexon.co.uk).

## P182 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.

<b>Respondent:</b>	<i>Joseph Hart, CE Electric UK</i>
<b>No. of Parties Represented</b>	2
<b>Parties Represented</b>	<i>YEDL and NEDL</i>
<b>No. of Non Parties Represented</b>	
<b>Non Parties represented</b>	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
<b>Role of Respondent</b>	<i>LDSO</i>

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Proposed Modification should not be made?	Yes	Consideration of the effects on LDSO revenues had not been factored into the decision making process
2.	Do you agree with the Panel's views on P182 and the provisional recommendation to the Authority contained in the draft Modification Report that P182 Alternative Modification should not be made?	Yes	Consideration of the effects on LDSO revenues had not been factored into the decision making process
3.	Do you agree with the Panel's view that Alternative Modification P182 better facilitates the Applicable BSC Objectives when compared with Proposed Modification P182? Please note this indicates Panel support for a Calendar Day implementation of P182.	No	No modification should be made
4.	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?	No	No comment
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P182?	Yes	
6.	Are there any further comments on P182 that you wish to make?	Yes	Suppliers should be mandated to comply with their existing obligations, with respect to data quality, under the terms of the BSC.

Please send your responses by **12:00 on Wednesday 3 August 2005** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P182 **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 Dena Harris on 020 7380 4364, email address [dena.harris@elexon.co.uk](mailto:dena.harris@elexon.co.uk).