

## Responses from P168 Assessment Consultation

Consultation Issued 27 August 2004

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	Iberdrola	P168_AR_001	1	0
2.	RWE Npower	P168_AR_002	10	0
3.	SmartestEnergy	P168_AR_003	1	0
4.	British Gas	P168_AR_004	1	0
5.	E.On UK	P168_AR_005	15	0
6.	Entergy-Koch Trading Europe Ltd	P168_AR_006	1	0
7.	Scottish and Southern	P168_AR_007	5	0
8.	Scottish Power	P168_AR_008	6	0
9.	EDF Trading and EDF Generation	P168_AR_009	2	0
10.	EDF Energy	P168_AR_010	9	0

## P168 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.

<b>Respondent:</b>	<i>Juan Luis Ríos</i>
<b>No. of Parties Represented</b>	<i>1</i>
<b>Parties Represented</b>	<i>Iberdrola Generación S.A.U.</i>
<b>No. of Non Parties Represented</b>	<i>0</i>
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Trader: BSC Agent – Party Agent –Notification Agent.</i>

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you believe that the Proposed Modification P168 would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	Yes	Competition will be more intense if we have information of what the others parties are doing. As a general rule, the more information, the more competitive the market would be.
2.	Do you support the Modification Group's approach to the format and frequency of publication of GC/DC values under the Proposed Modification P168? <i>Please give rationale</i>	Yes	Once approved P168, please inform new entries as Iberdrola where we will be able to obtain this information in Elexon website.
3.	Would your organisation use GC and DC values if this data was published on the BSC Website? <i>Please give rationale, including the activities in which such data would be used</i>	Yes	We would have more information for creating our own model of the UK Wholesale Market and specially, its interaction with continental wholesale markets through the Interconector.
4.	Do you believe that non-publication of GC and DC values represents a barrier to participation in the market? <i>Please give rationale</i>	Yes	This information was previously published and studied by the parties that operated in the UK before December 2003. Therefore, new entrants have barrier as this information currently is not being published.

Q	Question	Response Error! Bookmark not defined.	Rationale
5.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	No	
6.	Are there any further comments on P168 that you wish to make?	No	

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Please send your responses by **17:00 on Friday 27 August 2004** to [modification.consultations@exxon.co.uk](mailto:modification.consultations@exxon.co.uk) and please entitle your email '**P168 Assessment 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 (lead analyst) on 020 7380 4030, email address [kathryn.coffin@exxon.co.uk](mailto:kathryn.coffin@exxon.co.uk).

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<b>Respondent:</b>	<i>Carl Wilkes</i>
<b>No. of Parties Represented</b>	<i>10</i>
<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>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent</i>

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you believe that the Proposed Modification P168 would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	Yes	This proposal would better facilitate applicable BSC Objective C.
2.	Do you support the Modification Group's approach to the format and frequency of publication of GC/DC values under the Proposed Modification P168? <i>Please give rationale</i>	Yes	A weekly update would be acceptable.
3.	Would your organisation use GC and DC values if this data was published on the BSC Website? <i>Please give rationale, including the activities in which such data would be used</i>	Yes	This information would be useful in data validation checks & ad hoc data enquiries.
4.	Do you believe that non-publication of GC and DC values represents a barrier to participation in the market? <i>Please give rationale</i>	Yes	We believe there is some evidence from small suppliers that access to market information could effect potential new entrants.

Q	Question	Response Error! Bookmark not defined.	Rationale
5.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	No	
6.	Are there any further comments on P168 that you wish to make?	No	

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<b>Respondent:</b>	<i>Robert Owens</i>
<b>No. of Parties Represented</b>	<i>1</i>
<b>Parties Represented</b>	<i>SmartestEnergy Limited</i>
<b>No. of Non Parties Represented</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Consolidator</i>

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you believe that the Proposed Modification P168 would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	Yes	Availability, and equality of access to information are important requirements of a competitive market.  On this basis BSC Objective (c) would seem the most appropriate.
2.	Do you support the Modification Group's approach to the format and frequency of publication of GC/DC values under the Proposed Modification P168? <i>Please give rationale</i>	Yes	
3.	Would your organisation use GC and DC values if this data was published on the BSC Website? <i>Please give rationale, including the activities in which such data would be used</i>	Yes	The data is useful for modelling work.
4.	Do you believe that non-publication of GC and DC values represents a barrier to participation in the market? <i>Please give rationale</i>	Yes	"barrier to entry" is a bit strong as it is unlikely that participants are put off by the lack of this information – it is a potential barrier to competition, however, if this information is not available equally to all parties.

Q	Question	Response Error! Bookmark not defined.	Rationale
5.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	No	
6.	Are there any further comments on P168 that you wish to make?	No	

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<b>Respondent:</b>	Mark Manley
<b>No. of Parties Represented</b>	
<b>Parties Represented</b>	British Gas Trading (BGT)
<b>No. of Non Parties Represented</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you believe that the Proposed Modification P168 would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	Yes/No	BGT is supportive of the proposal however BGT is unsure how P168 better facilitates competition in the generation and supply of electricity. BGT understands the argument that publication of GC and DC values will increase the level of transparency in the market. However increased transparency alone does not necessarily facilitate competition.
2.	Do you support the Modification Group's approach to the format and frequency of publication of GC/DC values under the Proposed Modification P168? <i>Please give rationale</i>	Yes	BGT agrees with the Modification Group's approach to re-instate the format and frequency of the publication of these values. This is a pragmatic approach to the issue and is consistent with the previous approach taken by BSCCo prior to the data being withdrawn from the website.
3.	Would your organisation use GC and DC values if this data was published on the BSC Website? <i>Please give rationale, including the activities in which such data would be used</i>	No	BGT at this point would not utilise the values if the data were published on the BSC website.
4.	Do you believe that non-publication of GC and DC values represents a barrier to participation in the market? <i>Please give rationale</i>	No	BGT are not aware that the non-publication of GC and DC values being a barrier to entry.

Q	Question	Response Error! Bookmark not defined.	Rationale
5.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	No	BGT believes the proposed solution is the appropriate solution for delivering the intended aim
6.	Are there any further comments on P168 that you wish to make?	Yes	BGT are not opposed to this proposal, we are unsure how this better facilitates the Applicable BSC Objectives.

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<b>Respondent:</b>	E.ON UK plc
<b>No. of Parties Represented</b>	15
<b>Parties Represented</b>	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
<b>No. of Non Parties Represented</b>	0
<b>Non Parties represented</b>	N/A
<b>Role of Respondent</b>	Supplier, Generator, Trader, Consolidator, Exemptable Generator and Party Agent

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you believe that the Proposed Modification P168 would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	Yes	We believe that Modification P168 would provide an enhanced level of transparency. We therefore concur with the provisional thoughts of the Modification Group that P168 would better facilitate applicable objective (c)... 'Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity.
2.	Do you support the Modification Group's approach to the format and frequency of publication of GC/DC values under the Proposed Modification P168? <i>Please give rationale</i>	Yes	Weekly publication on the BSC website is consistent with the manner in which the information had previously been published. The Proposer has clarified that the intention of this modification is to provide the GC/DC values in the same format and at the same frequency as before.

Q	Question	Response Error! Bookmark not defined.	Rationale
3.	Would your organisation use GC and DC values if this data was published on the BSC Website? <i>Please give rationale, including the activities in which such data would be used</i>	Yes	We would use this information for market analysis and to validate our own submission.
4.	Do you believe that non-publication of GC and DC values represents a barrier to participation in the market? <i>Please give rationale</i>	No	Notwithstanding our support for the provision of GC/DC values on the BSC website, we would not consider the absence of this data to represent a barrier to participation in the market. We would categorise the publication of GC/DC values as being useful rather than essential.
5.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	No	
6.	Are there any further comments on P168 that you wish to make?	No	

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<b>Respondent:</b>	<i>Entergy-Koch Trading Ltd</i>
<b>No. of Parties Represented</b>	
<b>Parties Represented</b>	<i>Entergy-Koch Trading Ltd</i>
<b>No. of Non Parties Represented</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Trader</i>

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you believe that the Proposed Modification P168 would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	Yes	The modification will improve the amount of information available to market participants. This will better facilitate relevant objective (c) 'promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity' as parties will be better able to assess fundamental market information.
2.	Do you support the Modification Group's approach to the format and frequency of publication of GC/DC values under the Proposed Modification P168? <i>Please give rationale</i>	Yes	The proposed approach appears sufficient given the nature of the data.

Q	Question	Response Error! Bookmark not defined.	Rationale
3.	Would your organisation use GC and DC values if this data was published on the BSC Website? <i>Please give rationale, including the activities in which such data would be used</i>	Yes	The information would form part of a market assessment in some circumstances. EKT accepts that the information will have different value for different parties. It is difficult to assess the overall value of the information, but there should always be a presumption that information transparency is useful for market development. Further, when assessing the value of information it is important to consider that the industry structure is not static so the value of information will change over time.
4.	Do you believe that non-publication of GC and DC values represents a barrier to participation in the market? <i>Please give rationale</i>	Yes	If the information is not made available this could create a precedent for removing other useful information if some market participants seek to quantify the value within a narrow scope. As this information was previously made available without any market detriment or complaint about commercial confidentiality there should be no reason to oppose implementation.
5.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>		No.
6.	Are there any further comments on P168 that you wish to make?	No	No.

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Dear Sirs,

This response is sent on behalf of Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., SSE Energy Supply Ltd. and Medway Power Ltd.

In relation to the six questions listed in the Assessment Consultation document, contained within your note of 20th August 2004 concerning Modification Proposals P168, we have the following comments to make:-

Q1 Do you believe that the Proposed Modification P168 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)

Yes, we believe that Modification Proposal P168 will better facilitate the achievement of the applicable BSC Objectives for the reasons outlined in the first two substantive paragraphs of section 3 of the Assessment Consultation document.

Q2 Do you support the Modification Group's approach to the format and frequency of publication of GC/DC values under the Proposed Modification P168? Please give rationale

Yes, for the reasons outlined in section 2.1 of the Assessment Consultation document.

Q3 Would your organisation use GC and DC values if this data was published on the BSC website? Please give rationale, including the activities in which such data would be used

Yes, we believe we would use this data potentially for a variety of activities.

Q4 Do you believe that non-publication of GC and DC values represents a barrier to participation in the market? Please give rationale

No. We do not agree with the premise outlined in the third substantive paragraphs of section 3 of the Assessment Consultation document. Information, such as MIL/MEL, is publically available and can be subjected to analysis by parties (large and small), consultants, trade publications etc., etc. New entrants etc., in seeking to become a market participant can obtain advice from consultants etc., on what information they need to take cognisance of. We do not agree with the premise that new entrants should be provided with such analysis (that other parties, large and small, have had to pay to undertake) for free.

Q5 Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? Please give rationale

None at this time.

Q6 Are there any further comments on P168 that you wish to make?

None at this time.

Regards

Garth Graham  
Scottish and Southern Energy plc

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<b>Respondent:</b>	Don Sinclair (SAIC Ltd)
<b>No. of Parties Represented</b>	6
<b>Parties Represented</b>	<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.
<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 / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state<sup>1</sup>)</i> Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent

Q	Question	Response <sup>1</sup>	Rationale
1.	Do you believe that the Proposed Modification P168 would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	Yes	Publication of data will enable BSC Parties to ensure data submitted accurately reflected by Elexon. This would better facilitate the achievement of BSC Objective (c) – Competition.
2.	Do you support the Modification Group's approach to the format and frequency of publication of GC/DC values under the Proposed Modification P168? <i>Please give rationale</i>	Yes	It makes sense to utilise the same format and frequency as previously provided. This approach enables parties' could use the previous set up and ensure the least cost arrangement.
3.	Would your organisation use GC and DC values if this data was published on the BSC Website? <i>Please give rationale, including the activities in which such data would be used</i>	Yes	Data would be used for validation of published Credit Indebtedness figures.

<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
4.	Do you believe that non-publication of GC and DC values represents a barrier to participation in the market? <i>Please give rationale</i>	No	Parties have access to data on own BM Units.
5.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	No	Proposed solution easily implemented and relatively low cost.
6.	Are there any further comments on P168 that you wish to make?	No	

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<b>Respondent:</b>	<i>Steve Drummond</i>
<b>No. of Parties Represented</b>	<i>Two</i>
<b>Parties Represented</b>	<i>EdF Trading Ltd and EDF (Generation)</i>
<b>No. of Non Parties Represented</b>	<i>None</i>
<b>Non Parties represented</b>	<i>N/A</i>
<b>Role of Respondent</b>	<i>Trader/Generator</i>

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you believe that the Proposed Modification P168 would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	Yes	Through providing more information to the market, which would allow greater monitoring and understanding of trading activity, the proposal would better achieve the BC Objective (c).
2.	Do you support the Modification Group's approach to the format and frequency of publication of GC/DC values under the Proposed Modification P168? <i>Please give rationale</i>	Yes	Once a week is adequate, although if the cost is small enough it could perhaps be produced more frequently.
3.	Would your organisation use GC and DC values if this data was published on the BSC Website? <i>Please give rationale, including the activities in which such data would be used</i>	Yes	Probably.
4.	Do you believe that non-publication of GC and DC values represents a barrier to participation in the market? <i>Please give rationale</i>	No	It is possible to gather similar information by other means, but if the information is not commercially sensitive (which it doesn't appear to be) then it should be readily available to the market.

Q	Question	Response Error! Bookmark not defined.	Rationale
5.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	No	
6.	Are there any further comments on P168 that you wish to make?	No	

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<b>Respondent:</b>	Paul Mott (EDF Energy)
<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) EDF Energy (Cottam Power) 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>	N/A
<b>Role of Respondent</b>	Supplier/Generator/ Trader

Q	Question	Response	Rationale
1.	Do you believe that the Proposed Modification P168 would better facilitate the achievement of the Applicable BSC Objectives? <i>Please give rationale and state objective(s)</i>	Yes	The release of this information would better facilitate achievement of Applicable BSC Objective (c) as it would promote transparency of the market and facilitate competition.
2.	Do you support the Modification Group's approach to the format and frequency of publication of GC/DC values under the Proposed Modification P168? <i>Please give rationale</i>	Yes	EDF Energy believes that the solution described in the consultation report is the most efficient.
3.	Would your organisation use GC and DC values if this data was published on the BSC Website? <i>Please give rationale, including the activities in which such data would be used</i>	Yes	We would probably use the data in the same way we could look at historic MEL and MIL submissions.
4.	Do you believe that non-publication of GC and DC values represents a barrier to participation in the market? <i>Please give rationale</i>	No	It's more a nice to have than an essential requirement.

Q	Question	Response	Rationale
5.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered? <i>Please give rationale</i>	No	EDF Energy notes that if Alternative Modification P169 is approved that there is no requirement for Proposed Modification P168.
6.	Are there any further comments on P168 that you wish to make?	No	

Parties are encouraged to provide financial information with regards 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 **17:00 on Friday 27 August 2004** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email '**P168 Assessment 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 (lead analyst) on 020 7380 4030, email address [kathryn.coffin@elexon.co.uk](mailto:kathryn.coffin@elexon.co.uk).