

Responses from P168 Draft Report Consultation

Consultation Issued 21 October 2004

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	E.ON UK	P168_DR_001	15	0
2.	RWE NPower	P168_DR_002	10	0
3.	EDF Energy	P168_DR_003	9	0
4.	BGT	P168_DR_004	1	0

P168 REPORT PHASE CONSULTATION QUESTIONS

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

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

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views on P168 and the provisional recommendation to the Authority contained in the draft Modification Report that P168 should be made? Please give rationale.	Yes	P168 will result in an improved level of transparency. We therefore believe that this modification will better facilitate effective 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	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P168? Please give rationale.	Yes	
4.	Are there any further comments on P168 that you wish to make?	No	

Please send your responses by **17:00** on **Thursday 28 October 2004** to modification.consultations@elexon.co.uk and please entitle your email '**P168 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Panel.

Any queries on the content of the consultation pro-forma should be addressed to Kathryn Coffin on 020 7380 4030, email address kathryn.coffin@elexon.co.uk.

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

Q	Question	Response <small>Error! Bookmark not defined.</small>	Rationale
1.	Do you agree with the Panel's views on P168 and the provisional recommendation to the Authority contained in the draft Modification Report that P168 should be made? Please give rationale.	Yes	We agree with the Panel's views on P168 and the provisional recommendations.
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?	Yes	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P168?	Yes	
4.	Are there any further comments on P168 that you wish to make?	Yes	We note that although the Proposed Modification is desirable it is not as preferable as Modification P169 (Alternate).

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Respondent:	Jim Beynon (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) EDF Energy (Cottam Power) 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	Rationale
1.	Do you agree with the Panel's views on P168 and the provisional recommendation to the Authority contained in the draft Modification Report that P168 should be made? Please give rationale.	Yes	EDF Energy believe that P168 would better facilitate Applicable BSC Objective (c), since publication of GC and DC values would promote the transparency of the market and thereby facilitate 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	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P168? Please give rationale.	Yes	
4.	Are there any further comments on P168 that you wish to make?	No	

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ELEXON Limited
4th Floor
350 Euston Road
London
NW1 3AW

25 October 2004

Dear Sirs,

Re: Modification Proposal P168 – Publication of BMU GC and DC values on the ELEXON website

Thank you for the opportunity of responding to this draft modification report considering Modification Proposal P168. British Gas Trading (BGT) agrees with the Panel's provisional recommendation that the Modification should be made.

BGT agrees with the proposed implementation date of 10 Working Days following an Authority decision.

If you have any questions regarding this response please contact me

Yours faithfully

Mark Manley
Contract Manager

A *centrica* business

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