

Responses from P151 Draft Report Consultation

Consultation issued on 18 December 2003.

Representations were received from the following parties:

No	Company	File Number	No. BSC Parties Represented	No. Non-Parties Represented
1.	National Grid	P151_DR_001	1	0
2.	British Gas Trading	P151_DR_002	1	0
3.	EDF Energy Trading Networks	P151_DR_003	9	0
4.	Scottish Power UK Plc	P151_DR_004	6	0
5.	Aquila Networks Plc	P151_DR_005	1	0
6.	British Energy Power & Energy Trading Ltd	P151_DR_006	3	0
7.	Scottish and Southern Energy	P151_DR_007	5	0

P151_DR_001 – National Grid

Respondent:	
No. of BSC Parties Represented	One
BSC Parties Represented	National Grid
No. of Non BSC Parties Represented	None
Non BSC Parties represented	None
Role of Respondent	BSC Party

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P151 and the provisional recommendation to the Authority contained in the draft Modification Report that P151 should be made? Please give rationale.	Yes	We support the Panel's provisional recommendation to the Authority that the modification should be made.
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 P151? Please give rationale.	Yes	As there are no systems impacts resulting from this changes we believe that an implementation date of 10 working days post decision is appropriate.
4.	Are there any further comments on P151 that you wish to make?	No	

P151_DR_002 – British Gas Trading

Dear Sirs,

Re: Modification Proposal P151 – Housekeeping Modification (BSC Panel)

Thank you for the opportunity of responding to this draft modification report considering Modification Proposal P151. British Gas Trading (BGT) agrees with the Panel's provisional recommendation that the Modification Proposal will better facilitate Applicable BSC Objective (d).

BGT concur with the proposed implementation date.

If you have any questions regarding this response please contact me 01753 758137.

Yours faithfully

British Gas Trading

P151_DR_003 EDF Energy Networks plc

Respondent:	
No. of BSC Parties Represented	9
BSC 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 BSC Parties Represented	
Non BSC Parties represented	
Role of Respondent	Supplier / Generator / Party Agent / Distribution Business

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P151 and the provisional recommendation to the Authority contained in the draft Modification Report that P151 should be made? Please give rationale.	Yes	Although these are only minor problems ensuring BSC is unambiguous reduces possible problems for existing and new parties.
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.		We are prepared to accept Elexon's guidance over this matter.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P151? Please give rationale.	Yes	Amendments should be introduced to BSC as soon as practicable.
4.	Are there any further comments on P151 that you wish to make?	No	

P151_DR_004 Scottish Power UK Plc

Respondent:	SAIC Ltd
No. of BSC Parties Represented	6
BSC Parties Represented	Scottish Power UK plc; ScottishPower Energy Management Ltd.; ScottishPower Generation Ltd; ScottishPower Energy Retail Ltd.; SP Transmission Ltd; SP Manweb plc.
No. of Non BSC Parties Represented	0
Non BSC Parties represented	
Role of Respondent	Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P151 and the provisional recommendation to the Authority contained in the draft Modification Report that P151 should be made? Please give rationale.	Yes	<i>We agree that the proposed changes to address a number of minor inconsistencies, typographical errors and omissions within the BSC should be made.</i>
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	We agree that the legal text would appear to be appropriate to address the defects identified in this proposal.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P151? Please give rationale.	Yes	We agree that due to the minor nature of these changes, with no systems impact, that 10wd is sufficient notification following an Authority decision.
4.	Are there any further comments on P151 that you wish to make?	No	

P151_DR_005 Aquila Networks Plc

Aquila Networks PLC would like to return a response of 'No Comment' to P151 Consultation on Draft Modification Report.

P151_DR_006 British Energy Power & Energy Trading Ltd

Respondent:	
No. of BSC Parties Represented	3
BSC Parties Represented	<i>British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, Eggborough Power Ltd</i>
No. of Non BSC Parties Represented	-
Non BSC Parties represented	-.
Role of Respondent	<i>Supplier/Generator/Trader/Consolidator/Exemptable Generator/Party Agent)</i>

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P151 and the provisional recommendation to the Authority contained in the draft Modification Report that P151 should / should not be made?	Yes	Mostly minor typographical and consistency errors which should be corrected at minimum cost. Note comments below in respect of items 10, 12, 16 and 17 of modification proposal appendix 1.
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 P151?	Yes	
4.	Are there any further comments on P151 that you wish to make?	Yes	See below.

Item 10 of the Modification Proposal appendix and legal text refer to Section W3.3.1 & 3.6.1. W3.6.1(a) also requires typo correction of 'respect if' to 'respect of'.

Item 12 Section L: refers to consequential changes arising from implementation of CP854 revised BSCP514. The Code currently states that certain SVA Meter Operator Agent processes should be carried out in accordance with Party Service Line 110. The modification proposes that a requirement for adherence to BSCP514 should be added. Unless the requirements of BSCP514 are the same as those in Party Service Line 110, this does not appear to meet Elexon's usual strict criteria for classification as a Housekeeping modification, since it could have a commercial impact on the operation of the BSC.

Item 13 Section U1.6.2: Addition of TLFA to list of BSC Agents. For consistency, the legal text should say '..the FAA and the TLFA'. Again, a desirable change but not clear to me that this meets Elexon's usual strict criteria for classification as a Housekeeping modification.

Item 16 refers to formatting changes in section T. T4.5.1(a) reference to QBS also has an obsolete historic markup highlight still showing, following a previous change from QBO to QBS.

Item 17: Section T3.6. The notation k-1 is preferable, indicating the notification notified before the one being considered, being the notation used in the equations themselves, being less able to be "lost" or confused in printing, and being consistent with the SAA Service

Description. The SAA URS uses the k- notation, and should be brought into consistency at an opportune time.

P151_DR_007 Scottish and Southern Energy

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

In relation to the four questions contained within your note of 17th December 2003, and the associated Modification Report for P151, we have the following comments to make:-

Q1 Do you agree with the Panel's views on P151 and the provisional recommendation to the Authority contained in the draft Modification Report that P151 should be made? Please give rationale.

Subject to our comments on the legal text, Yes, we agree with the proposed BSC Panel recommendation to the Authority that Modification Proposal P151 should be made for the reasons outlined in the Modification Report. We believe that P151 will better facilitate the achievement of the Applicable BSC Objectives and it should therefore be approved.

Q2 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.

We believe there are four amendments needed to the proposed legal text, as follows:-

(i) In respect of the change to Section W paragraph 3.6.1, should the opening line read:-

"Subject to paragraph 3.6.2, a Party may refer a matter that is the subject of a Trading Dispute to arbitration".

(ii) In respect of the change to Section W paragraph 3.6.1, should the change read "or" rather than "and" between the "(a)" and "(b)" sub-paragraphs? If the matter is not referred to the Panel (as indicated in the second sub-paragraph of 3.6.1) then the Panel cannot make a decision (as indicated in the first sub-paragraph of 3.6.1) and therefore the matter cannot be referred to arbitration. This does not appear (by virtue of there being a second sub-paragraph) to be the intention of the text in this paragraph.

(iii) Could it please be clarified where the letter "(b)" shown (in this P151 legal text) in Section W paragraph 3.6.1 appears in the Code? According to Version 5 of Section W this shows paragraph 3.6.1 as having two sub-paragraphs "(a)". Should this therefore be formally shown in the legal text as a change from "(a)" to "(b)" for this P151 Modification Proposal?

(iv) In respect of Section W paragraph 3.5.3 should there be an "or" between the "(a)" and "(b) sub-paragraphs"?

Q3 Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P151? Please give rationale.

If the Modification Proposal P151 is approved, we agree with the proposed BSC Panel recommendation on the timing for the Implementation Date, as outlined in the Modification Report.

Q4 Are there any further comments on P151 that you wish to make?

Nothing further at this time.

Regards

Scottish and Southern plc