

Responses from P119 Draft Report Consultation

Consultation issued 19 March 2003

Representations were received from the following parties:

No	Company	File Number	No. BSC Parties Represented	No. Non-Parties Represented
1.	NGC	P119_DR_001	1	0
2.	Powergen	P119_DR_002	15	0
3.	Scottish and Southern	P119_DR_003	4	0
4.	British Gas Trading	P119_DR_004	1	0
5.	Scottish Power Group	P119_DR_005	6	0

P119_DR_001 – NGC

Respondent:	<i>National Grid</i>
No. of BSC Parties Represented	One
BSC Parties Represented	<i>Please list all BSC Parties responding on behalf of (including the respondent company if relevant). National Grid</i>
No. of Non BSC Parties Represented	None
Non BSC Parties represented	<i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent and Parties represented	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state) BSC Party</i>

Q	Question	Response	Rationale
1	Do you agree with the Panel's views on P119 and the provisional recommendation to the Authority contained in the draft Modification Report that P119 be made? Please give rationale.	Yes	We agree with the rationale of the Panel that this modification will increase the efficiency of the upheld Trading Disputes relating to Credit Default reporting process.
2	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	The change is minor and clearly addresses the defect.
3	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P119? Please give rationale.	Yes	The implementation 15 business days after an Authority decision is appropriate as no BSC Systems are being updated.
4	Do you believe that there are any impacts that have not been highlighted? If yes please give details.	No	
5	Are there any further comments on P119 that you wish to make?	No	

P119_DR_002 – Powergen

Respondent:	<i>Name</i> Christiane Sykes
No. of BSC Parties Represented	15
BSC Parties Represented	Powergen UK plc, Powergen Retail Limited, Diamond Power Generation Limited, Cottam Development Centre Limited, TXU Europe Drakelow Limited, TXU Europe Ironbridge Limited, TXU Europe 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 Limited
No. of Non BSC Parties Represented	
Non BSC Parties represented	<i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent and Parties represented	<i>Supplier and generator</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1	Do you agree with the Panel's views on P119 and the provisional recommendation to the Authority contained in the draft Modification Report that P119 be made? Please give rationale.	Yes / No	We agree with the proposal in principle, however, it is of course, difficult to fully agree with a recommendation to implement the modification without having access to an analysis of the costs involved in the functionality to publish on the BMRS. It might have been more efficient to wait for the implementation costs of CP917 to be published before we responded to P119. We accept that regardless of the outcome of CP917, the changes proposed in P119 will still be necessary, however, recommending a proposal without all the information at hand might, perhaps, be considered somewhat imprudent.
2	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal? Please give rationale.	Yes	The amendment to the legal text in section M3.5.1 seems to provide the most simplistic way of addressing the defect. We concur that the option to publish notices on both the BMRS and/or the BSC website provides cover for any system failure.
3	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P119? Please give rationale.	Yes	The dates given are sensible in bringing about the timely implementation of the proposal, should the Authority wish to implement it.

Q	Question	Response Error! Bookmark not defined.	Rationale
4	Do you believe that there are any impacts that have not been highlighted? If yes please give details.	Yes	Details of potential costs, in the event that CP917 is not implemented. Although this proposal is not contingent on the implementation CP917, it is reasonable that the industry is made aware of the costs involved in P119, were CP917 not to go ahead, before responding to the draft modification report.
5	Are there any further comments on P119 that you wish to make?	No	

P119_DR_003 – Scottish and Southern

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

Further to your note of 19th March 2003, and the associated draft Modification Report for P119, we agree with the proposed BSC Panel recommendation to the Authority that this Modification Proposal P119 should be made.

If the Modification Proposal P119 is approved, we agree with the proposed BSC Panel recommendation on the timing for the Implementation Date, as outlined in Section 1.1 of the Modification Report.

Regards

Garth Graham
Scottish & Southern Energy plc

P119_DR_003- British Gas Trading

Re: Modification Proposal P119 – Increased Flexibility in the Reporting of Upheld Trading Disputes Relating to Credit Default

Thank you for the opportunity of responding to this draft modification report considering Modification Proposal P119. British Gas Trading (BGT) supports the Modification Proposal as removing the requirement to duplicate publication of upheld Trading Disputes in relation to Credit Default can be seen to improve the efficiency of the process and can be seen to better facilitate Applicable BSC Objective (d).

BGT agree the legal text allows for the flexibility to report the incident on either the BMRS or ELEXON website and concur with the proposed implementation date.

BGT assume that ELEXON Circulars will continue to be sent following Trading Dispute Committee meetings to provide added visibility of this information to BSC Parties.

Yours faithfully

Mark Manley
Contract Manager

P119_DR_005- Scottish Power Group

Respondent:	Name John W Russell (SAIC Ltd)
No. of BSC Parties Represented	6
BSC Parties Represented	<i>Please list all BSC Parties responding on behalf of (including the respondent company if relevant).</i> Scottish Power UK plc; ScottishPower Energy Trading Ltd.; ScottishPower Generation Ltd; ScottishPower Energy Retail Ltd.; SP Transmission Ltd; SP Manweb plc.
No. of Non BSC Parties Represented	
Non BSC Parties represented	<i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent and Parties represented	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state)</i> Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent

Q	Question	Response	Rationale
1	Do you agree with the Panel's views on P119 and the provisional recommendation to the Authority contained in the draft Modification Report that P119 be made? Please give rationale.	Yes	<i>We agree that the implementation of P119 will provide a more flexible and cost effective vehicle for the publication of data, thereby allowing BSCCo to meet their obligations under the BSC code.</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	<i>We agree that the legal text appears to be appropriate.</i>
3	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P119? Please give rationale.	Yes	<i>We agree that the implementation date appears to be appropriate.</i>
4	Do you believe that there are any impacts that have not been highlighted? If yes please give details.	No	
5	Are there any further comments on P119 that you wish to make?	No	