

**Responses from P214 Report Phase Consultation**

**Consultation Issued on 14 November 2007**

**Representations were received from the following parties**

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	SAIC Ltd. (for and on behalf of ScottishPower)	P214_dMR_01	7	0
2.	Npower Limited	P214_dMR_02	10	0
3.	E.ON UK Energy Services Limited	P214_dMR_03	0	1
4.	Drax Power Limited	P214_dMR_04	1	0
5.	Scottish and Southern Energy	P214_dMR_05	6	0

## P214 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>	Gary Henderson
<b>Company Name:</b>	SAIC Ltd. (for and on behalf of ScottishPower)
<b>No. of BSC Parties Represented</b>	7
<b>Parties Represented</b>	ScottishPower Energy Management Ltd, ScottishPower Generation Ltd, ScottishPower Energy Retail Ltd, SP Transmission Ltd, SP Manweb plc, SP Distribution Ltd, CRE Energy Limited
<b>No. of Non BSC Parties Represented</b>	0
<b>Non Parties represented</b>	N/A
<b>Role of Respondent</b>	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
<b>Does this response contain confidential information?</b>	No

Q	Question	Response <sup>1</sup>	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P214 <b>should</b> be made? Please give rationale.	Yes	ScottishPower agreed with the Panel's provisional recommendation. The Proposed Modification better facilitates achievement of Objective (c) and Objective (d), reducing Party costs and increasing overall efficiency. This Modification is a positive solution which will quickly benefit the entire (Trading) market upon implementation.
2.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P214? Please give rationale.	Yes	ScottishPower agree the recommended implementation timescales. November 2008 is the earliest available date. A move to June 2009 should only be considered in exceptional circumstances as this would delay the delivery of the stated benefits to Parties and central Agents.

## P214 REPORT PHASE CONSULTATION

Q	Question	Response <sup>1</sup>	Rationale
3.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes	The draft legal text will enable the proposed changes.
4.	Are there any further comments on P214 that you wish to make?	No	

Please send your responses by **12:00 noon on Wednesday 28 November 2007** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email '**P214 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 Andrew Wright on 020 7380 4217, email address [andrew.wright@elexon.co.uk](mailto:andrew.wright@elexon.co.uk) or Kathryn Coffin on 020 7380 4030, email address [kathryn.coffin@elexon.co.uk](mailto:kathryn.coffin@elexon.co.uk).

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<b>Respondent:</b>	<i>Louisa Stuart-Smith</i>
<b>Company Name:</b>	Npower Limited
<b>No. of BSC Parties Represented</b>	10
<b>Parties Represented</b>	<i>RWE Trading GmbH; RWE Npower Ltd; Great Yarmouth Power Ltd; Npower Cogen Trading Ltd; Npower Direct Ltd; Npower Ltd; Npower Northern Ltd; Npower Northern Supply Ltd; Npower Yorkshire Ltd; Npower Yorkshire Supply Ltd</i>
<b>No. of Non BSC Parties Represented</b>	<i>None</i>
<b>Non Parties represented</b>	<i>N/a</i>
<b>Role of Respondent</b>	<i>Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

<b>Q</b>	<b>Question</b>	<b>Response <sup>1</sup></b>	<b>Rationale</b>
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P214 <b>should</b> be made? Please give rationale.	Yes	Overall we are happy that P214 will improve the Funds Administration process.
2.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P214? Please give rationale.	Yes	

## P214 REPORT PHASE CONSULTATION

Q	Question	Response <sup>1</sup>	Rationale
3.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes	
4.	Are there any further comments on P214 that you wish to make?	No	

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<b>Respondent:</b>	<i>Alastair Barnsley</i>
<b>Company Name:</b>	E.ON UK Energy Services Limited
<b>No. of BSC Parties Represented</b>	0
<b>Parties Represented</b>	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
<b>No. of Non BSC Parties Represented</b>	1
<b>Non Parties represented</b>	E.ON UK Energy Services Limited
<b>Role of Respondent</b>	<i>Party Agent</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

Q	Question	Response <sup>1</sup>	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P214 <b>should</b> be made? Please give rationale.	Yes / No	We should like to maintain a neutral stance as this proposed modification will not have a direct impact on our activities
2.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P214? Please give rationale.	Yes / No	We should like to maintain a neutral stance as this proposed modification will not have a direct impact on our activities
3.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes / No	We should like to maintain a neutral stance as this proposed modification will not have a direct impact on our activities

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Q	Question	Response <sup>1</sup>	Rationale
4.	Are there any further comments on P214 that you wish to make?	No	

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<b>Respondent:</b>	Stuart Cotten
<b>Company Name:</b>	Drax Power Limited
<b>No. of BSC Parties Represented</b>	One
<b>Parties Represented</b>	Drax Power Limited
<b>No. of Non BSC Parties Represented</b>	None
<b>Non Parties represented</b>	None
<b>Role of Respondent</b>	Generator
<b>Does this response contain confidential information?</b>	No

Q	Question	Response <sup>1</sup>	Rationale
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P214 <b>should</b> be made? Please give rationale.	Yes	We agree with the Panel that P214 would better facilitate the BSC than the current baseline for the following reasons: <ul style="list-style-type: none"> <li>The reduction in processing and banking costs, for Parties benefitting from the new thresholds, will be positive for competition (Objective C);</li> <li>There will be a reduction in costs for the FAA by moving to a system that removes the need for faxed notices and encourages Parties to move towards a paperless system (Objective D);</li> <li>The removal of redundant clauses from the BSC will increase clarity, allowing the FAA and Parties to work together more efficiently (Objective D).</li> </ul>
2.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P214? Please give rationale.	Yes	The provisional Implementation Date appears to be reasonable.



Q	Question	Response <sup>1</sup>	Rationale
3.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes / No	
4.	Are there any further comments on P214 that you wish to make?	No	

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Dear Sirs,

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

In relation to the four questions contained within your note of 14th November 2007, and the associated Modification Consultation for P214, we have the following comments to make:-

**Q1 Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P214 should be made?**

Yes. The solution proposed with P214; of permitting electronic communication of documentation plus the opt in/out option for receiving postal versions; does, we believe, better achieve the applicable BSC Objectives

**Q2 Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P214?**

We agree with the proposed BSC Panel recommendation regarding the timing for the Implementation Date, as outlined in the Modification Report.

**Q3 Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group?**

It appears to.

**Q4 Are there any further comments on P214 that you wish to make?**

Nothing further at this time.

Kind Regards

Garth Graham  
Scottish and Southern Energy