

Responses from P187 Draft Report Consultation

Consultation Issued 15 June 2005

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	E.ON UK plc	P187_dMR_001	15	0
2.	EDF Energy plc	P187_dMR_002	9	0
3.	Scottish and Southern plc	P187_dMR_003	5	0
4.	British Energy plc	P187_dMR_004	5	0
5.	Scottish Power	P187_dMR_005	6	0
6.	British Gas	P187_dMR_006	1	0
7.	National Grid Company	P187_dMR_007	1	0

P187 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:	E.ON UK plc
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	-
Non Parties represented	-
Role of Respondent	Supplier, Generator, Trader, Consolidator & Exemptable Generator

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views regarding P187 and the provisional recommendation to the Authority contained in the draft Modification Report that P187 should be made? Please give rationale.	Yes	
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 P187? Please give rationale.	Yes	We agree with the Panel that this is the most cost-efficient implementation approach.
4.	Are there any further comments on P187 that you wish to make?	No	

Please send your responses by **12:00 (noon) on Wednesday 22 June 2005** to modification.consultations@exxon.co.uk and please entitle your email '**P187 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@exxon.co.uk.

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Respondent:	Stephen Moore (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 regarding P187 and the provisional recommendation to the Authority contained in the draft Modification Report that P187 should be made? Please give rationale.	Yes	P187 would increase the efficiency of the modification process by ensuring that all requests for urgency were considered by the Authority.
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 P187? Please give rationale.	Yes	As this is solely a code change implementing it 10 days after a decision will impose no further costs on the industry; therefore there is no reason to delay implementation.
4.	Are there any further comments on P187 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., and SSE Energy Supply Ltd.

In relation to the four questions contained within your note of 15th June 2005, and the associated Consultation for P187, we have the following comments to make: -

Q1 Do you agree with the Panel's views regarding P187 and the provisional recommendation to the Authority contained in the draft Modification Report that P187 should be made? Please give rationale.

Yes, we agree with the proposed BSC Panel recommendation to the Authority that Modification Proposal P187 should be made for the reasons outlined in the Modification Report.

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.

It appears to.

Q3 Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P187? Please give rationale.

If the Modification Proposal P187 is approved, we agree with the proposed BSC Panel recommendation regarding the timing for the Implementation Date, as outlined in the Modification Report.

Q4 Are there any further comments on P187 that you wish to make?

Nothing further at this time.

Regards

Garth Graham
Scottish and Southern plc

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Respondent:	<i>Steven Eyre</i>
No. of Parties Represented	5
Parties Represented	<i>British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, Eggborough Power Ltd, British Energy Generation (UK) Ltd, British Energy Direct Ltd</i>
No. of Non Parties Represented	-
Non Parties represented	-
Role of Respondent	<i>Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree with the Panel's views regarding P187 and the provisional recommendation to the Authority contained in the draft Modification Report that P187 should be made? Please give rationale.	Yes	The adoption of P187 should make the modification process more efficient by firstly allowing parties to request urgent status in a transparent manner and secondly that all such requests receive consistent and equitable treatment. Consequently, P187 is, as a minimum, likely to better facilitate Applicable BSC Objective (d).
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 legal text proposed by the Modification Group correctly addresses the defect identified by the modification proposal.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P187? Please give rationale.	Yes	On the grounds of cost-efficiency we support the provisional recommendation on implementation i.e. 10 working days.
4.	Are there any further comments on P187 that you wish to make?	No	

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Respondent:	<i>Name James Kelly (SAIC Ltd)</i>
No. of Parties Represented	6
Parties Represented	<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.
No. of Non Parties Represented	0
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state ¹)</i> Supplier / Generator / Trader / Consolidator / Exemptable Generator

Q	Question	Response ¹	Rationale
1.	Do you agree with the Panel's views regarding P187 and the provisional recommendation to the Authority contained in the draft Modification Report that P187 should be made? Please give rationale.	Yes	ScottishPower believe that this Modification will result in an improved attainment of BSC objectives by encouraging a more efficient operation of settlements and increasing the likelihood of 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	ScottishPower agrees that the legal text in the Modification report addresses the current defect and provides a fairer mechanism to allow Parties to request that Modifications be treated as urgent.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P187? Please give rationale.	Yes	The Implementation Date and strategy for P187 balances a cost effective solution with an implementation date which will ensure that the solution becomes effective for Parties within a realistic timescale.
4.	Are there any further comments on P187 that you wish to make?	No	

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¹ Delete as appropriate – please do not use strikeout, this is to make it easier to analyse the responses.



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Our Ref.
Your Ref.
22 June 2005

Dear Sirs,

Re: Modification Proposal P187 – Introducing the ability for a Party to request urgent status and for it to be considered by the Authority

Thank you for the opportunity of responding to this draft modification report considering Modification Proposal P185. British Gas Trading (BGT) agrees with the Panel's provisional recommendation that the Modification Proposal should be approved.

BGT believe the modification will better facilitate Applicable BSC Objective (d) and to a lesser extent Objective (c). The proposal will improve the current process for considering requests for urgency by ensuring that all requests are treated in a consistent manner. Ensuring the Authority consider all requests for urgency will improve the efficiency of the process. BGT believe that formalising the ability of a Party to request urgency will have a positive secondary effect on competition and thereby better facilitate Objective (c).

BGT agrees with the proposed implementation date and legal text.

If you have any questions regarding this response please contact me 01753 431137.

Yours faithfully

Mark Manley
Contract Manager

A *centrica* business

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Respondent:	<i>Name Shafqat Ali</i>
No. of Parties Represented	One
Parties Represented	<i>Please list all Parties responding on behalf of (including the respondent company if relevant). National Grid Company</i>
No. of Non Parties Represented	None
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state¹) System Operator</i>

Q	Question	Response¹	Rationale
1.	Do you agree with the Panel's views regarding P187 and the provisional recommendation to the Authority contained in the draft Modification Report that P187 should be made? Please give rationale.	Yes	The transparency introduced by P187 will enhance industry's understanding of the BSC governance process with regard to requesting urgency status for a Modification Proposal. Improved process transparency will promote efficiency in the implementation and administration of the Balancing and Settlement arrangements (Applicable BSC Objective (d)), and improved market understanding will promote effective competition in the generation and supply of electricity (Applicable BSC Objective (c)).
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 P187? Please give rationale.	Yes	
4.	Are there any further comments on P187 that you wish to make?	No	

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