

Responses from P53 Draft Modification Report Consultation

Consultation issued 21 February 2002

Representations were received from the following parties:

No	Company	File Number	No. Parties Represented
1.	Innogy Group	P53_MR_001	9
2.	TXU	P53_MR_002	1
3.	SEEBOARD	P53_MR_003	2
4.	GPU Power UK	P53_MR_004	1
5.	ScottishPower UK plc	P53_MR_005	5
6.	Scottish & Southern Energy plc	P53_MR_006	4
7.	British Energy	P53_MR_007	3
8.	British Gas Trading	P53_MR_008	1

P53_MR_001 – Innogy Group

This is the response on behalf of Innogy, Innogy Cogen Ltd, NP Cogen Trading Ltd, Npower Ltd, Npower Direct Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd, Npower Northern Ltd, and Npower Northern Supply Ltd.

The Innogy Group agree with the P53 Modification Report as drafted, and have no further comments to make.

Ben Willis
Senior Commercial Analyst
Npower Ltd.

P53_MR_002 – TXU

We support the conclusions and recommendations as drafted.

P53_MR_003 – SEEBOARD

With respect of the above mentioned proposal we agree with recommendations within section 1.1 of draft modification report dated 21st February.

Dave Morton
SEEBOARD Energy Limited
SEEBOARD Power Networks plc

P53_MR_004 – GPU Power UK

Please find that GPU Power UK response to P53 - Changes to DC, GC and CALF and the Effect on Energy Indebtedness is 'No Comment'.

Rachael Gardener
Deregulation Control Group &
Distribution Support Office
GPU POWER.NETWORKS (UK) plc

P53_MR_005 – ScottishPower UK plc

With reference to the above, I would refer you to our previous comments on the proposal.

In this consultation response, we wish to reiterate the view, which we have previously provided in support of Mod P53: Changes to DC, GC and CALF and the Effect on Energy Indebtedness.

The legal drafting appears to be satisfactory.

I trust that you will find these comments helpful. Nonetheless, should you require further clarification of any of the above, please do not hesitate to contact me.

Yours Sincerely,
Man Kwong Liu
Calanais Ltd.

For and on behalf of: - Scottish Power UK Plc.; ScottishPower Energy Trading Ltd.; Scottish Power Generation Ltd.; Scottish Power Energy Retail Ltd.; SP Transmission Ltd.

P53_MR_006 – Scottish & Southern Energy plc

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

In relation to the Modification Report for Proposed Modification P53 contained in your note of 21st February 2002; we agree with the suggested BSC Panel recommendation to the Authority that this Modification proposal P53 be approved, and implemented 30 business days after the Authority's approval.

Garth Graham
Scottish & Southern Energy plc

P53_MR_007 – British Energy

British Energy supports the above modification and we refer you to the comments made on 4th February.

Rachel Ace
on behalf of
British Energy Generation
British Energy Power and Energy Trading
Eggborough Power Ltd

P53_MR_008 – British Gas Trading

Thank you for the opportunity of responding to this modification proposal. This response is on behalf of British Gas Trading Ltd (BGT).

BGT agree that P53 enables more reliance on the reporting of Energy Indebtedness figures from the ECVA. We believe that in this case the cost of amending the BSC systems outweighs the benefits that would be gained particularly after the implementation of P2. As such we support this modification as better facilitating the applicable BSC Objectives, particularly c and d.

Danielle Lane, Transportation Analyst