

## ANNEX 1 – REPRESENTATIONS

### Responses from P22 Modification Report Consultation

Representations were received from the following parties:

No	Company	File Number
1.	London Electricity	P22_MR_001
2.	SSE Energy Supply Ltd	P22_MR_002
3.	Dynegy	P22_MR_003
4.	SEEBOARD	P22_MR_004
5.	British Gas Trading	P22_MR_005
6.	Scottish Power UK Plc	P22_MR_006
7.	TXU Europe Energy Trading Ltd	P22_MR_007
8.	Innogy	P22_MR_008
9.	British Energy plc	P22_MR_009
10.	NGC	P22_MR_010
11.	Powergen	P22_MR_011

**P22\_MR\_001 – London Electricity**

Thanks for the chance to comment on P22. We would like to re-iterate our support for Mod 22 in its original intent, namely the release of the MW output usable by zone - without further identifying the zones - to all BSC Parties.

The information should not be at the BM unit level. Just aggregated by zone.

Regards

Paul Mott for London Electricity, South Western Electricity, Jade Power, Lenco and Sutton Bridge Power

## **P22\_MR\_002 – SSE Energy Supply Ltd**

Response on behalf of SSE Generation Limited, SSE Energy Supply Ltd, Keadby Generation Ltd and Keadby Developments Ltd.

As stated in our response to the previous round of consultation, we support in principle any modification that will equalise access to information for participants. However we remain unconvinced that there is a material issue at stake in this case. We have particular concerns regarding any plan to publish generator specific outage plans on the basis that we believe this would give rise to a significant reduction in the quality of planning data received by NGC.

On this basis our preference is for the alternative modification proposal, with information being provided by NGC, rather than being duplicated by generators.

Our preference would be to have information provided by BMRS zones on the basis that this would clearly avoid issues of commercial sensitivity. However we note the suggestion that NGC could amend NGC zones. We believe that in the interest of the applicable BSC objectives, this should be a fundamental requirement of the alternative proposal. It is important that zones don't give explicit information about particular generating stations. Although a matter for NGC and the Grid Code we believe this must be addressed as part of this modification proposal. It is also essential that new zone definitions are published.

For consistency our initial preference would be for information to be published on the BMRS. It is disappointing to note that once again, following impact assessment, it has been found that this is not practical. I am not aware that the Elexon website was originally intended for this purpose and the fact that information will be split over two sites creates inefficiencies. Ideally this should only be considered as an interim solution but on the otherhand we are keen to ensure that this modification is implemented at minimal cost.

I hope you find these comments useful.

Regards  
Beverley Grubb  
Market Development  
SSE Energy Supply Ltd

## P22\_MR\_003 – Dynegy

### **Modification Proposal P22: The provision of generator planned outage information to all BSC signatories.**

Dynegy are fully aware of the modification group's recommendation to the Authority, that the alternative modification should be implemented, which involves the publication of output usable data only.

The original proposal addressed two element of asymmetry, first the asymmetry between generators and non-generators, and secondly an asymmetry between NGC and all other BSC signatories.

Dynegy do not believe that the alternative modification proposed by the majority of the modification group better fulfils the relevant BSC objectives in comparison to the original modification. The implementation of the original proposal has a significant advantage in that it creates a level playing field in both areas of concern.

Firstly, we still believe that generators are able to work out the site specific information from the data release now being proposed. In time, with experience the same should be true for other players, but at the present time the alternative gives incumbents an advantage.

Secondly, it is vital to ensure that all information available to NGC is also provided to all market participants, in order to promote effective competition in the generation and supply of electricity, and thus promoting such competition in the sale and purchase of electricity. NGC as System Operator (SO) is active in the forward market and therefore has the ability to distort the forward market and the balancing mechanism by not making information available to all players. The unfair advantage NGC obtains by being the sole party to have access to such data results in a less efficient market being developed than may otherwise be achieved.

Finally, Dynegy do not believe that a majority view within a modification group necessary constitutes the correct recommendation for the Authority. We believe it is not acceptable to recommend a modification on the basis that a group of market participants have been capable to gather collectively and voice their similar opinions, influencing the recommendation. The recommended modification should better fulfil the relevant BSC objectives which the original proposal achieves in comparison to the alternative.

Dynegy would therefore recommend to the Authority that when this modification report is send to it for acceptance, that Ofgem should reject the alternative and accept the original proposal.

Yours sincerely,  
Rekha Patel  
Power Regulatory Analyst

**P22\_MR\_004 – SEEBOARD**

We have no further comments on this proposal.

Sue Fraser  
for DAVE MORTON  
0190 328 3465

P22\_MR\_005 – British Gas Trading

Thank you for the opportunity for commenting on this Modification Proposal. British Gas Trading (BGT) support implementation of the suggested alternative modification proposal as recommended by the Modification Group and the BSC Panel.

We believe the Alternative modification will further the Applicable BSC Objectives particularly by promoting effective competition in generation and supply of electricity. The provision of Output Usable data to all Parties will create a more equitable environment between generators and supplies.

Yours faithfully

Danielle Lane

Transportation Analyst

P22\_MR\_006 – Scottish Power UK Plc

A.1.1

After further consideration of the above proposal and the Draft Modification Report, I refer you to our previous comments at the assessment stage. We supported the Panel's recommendation then and while the latest proposal has not contained fully our own preference, we have no substantive view on the issues raised in the Report.

I trust you find these comments helpful, and please do not hesitate to contact me should you wish to discuss any points further.

Yours sincerely,

Man Kwong Liu  
Scottish Power UK Plc, Manweb Plc and Emerald Power Generation Ltd

**P22\_MR\_007 – TXU Europe Energy Trading Ltd**

TXU Europe Energy Trading Ltd (on behalf of 14 TXU companies) support the proposal to implement the alternative modification for the reasons given in our responses to the earlier consultations in relation to this proposal.

Regards

Nicola Lea  
Market Development Analyst  
TXU Europe Energy Trading Ltd

**P22\_MR\_008 – Innogy**

The Innogy Group of Companies ie

Innogy plc, Innogy Cogen Ltd, Innogy Cogeneration Trading Ltd, npower Ltd, npower direct Ltd, npower northern Ltd, and npower Yorkshire Ltd support the P22 Alternative Modification as outlined in the Draft Modification Report dated 26/09/01.

Terry Ballard  
01905-340507  
07989-493038

## P22\_MR\_009 – British Energy plc

### BSC Modification Proposal P22 - Provision of Generator Planned Outage Information to All BSC Signatories

British Energy does not support the original modification or the alternative, and does not consider that they assist in achieving the applicable BSC objectives:

1. Release of outage information could discriminate against base-load and non-portfolio generators by potentially revealing the future commercial position of such companies in a manner which is not revealed for other participants, nor for companies in other industries. Future availability for marginal or portfolio generators reveals relatively little about planned expected physical operation, and individual suppliers and other participants are not required to provide equivalent information.
2. Release of such information could weaken the incentives on generators to provide accurate information to NGC for planning purposes, which would act against the interests of participants in general and consumers in particular.
3. Indicative information may be misinterpreted as firm data.
4. The BSC is not the appropriate governance to consider Grid Code data and its availability.

We believe that a more effective way of pursuing equality of information provision would be for output usable data not to be available at all, except to NGC.

Referring to the detail of the modification report, we have the following comments:

4. The alternative modification proposal to publish "anonymised" zonal data is preferable to the original modification, in that it retains an element of commercial confidentiality of company plans. The Grid Code Review Panel should be empowered to consider the Grid Code zonal definitions to ensure anonymity of individual company plans.
5. The proposed legal drafting should avoid duplication. The table of Grid Code data proposed to be published should be stated once only, in Section V, and referred to only by reference in Section Q.
6. The legal drafting should refer to "Grid Code generator planning data" rather than simply "generation data".
7. Data may only be available under the Grid Code on business days. The tables specifying the data to be published should specify when the data is intended to be published - the date not just the time.
8. Grid Code OC2 data is continually updated. Should the drafting indicate that at any given time the data published will be the latest available? What if new data becomes available to NGC / BSCCo before the previous data has been published?

Martin Mate  
For  
British Energy Power & Energy Trading Ltd

British Energy Generation Ltd  
Eggborough Power Ltd

P22\_MR\_010 – NGC

## Modification Proposal P22: The Provision of Generator Planned Outage Information to all BSC Signatories: National Grid Response to Modification Report Consultation

In line with information we have provided during the progress of the Modification we believe that the Alternative Modification better meets the BSC Objectives than the Original Modification. The BSC drafting which implements this modification interacts with the Grid Code OC2 process. The comments below on the proposed BSC drafting are designed to improve consistency with the current OC2 process. In addition we suggest that the BSC drafting should be as flexible as possible to ensure that it does not unduly interfere with governance of the OC2 process under the Grid Code.

1. It is intended that the Grid Code will be modified to use the term “System Zone” rather than “Transmission Zone”. This proposed terminology should be reflected in the BSC text.
2. The definition of “Zonal Output Usable” and “Total Output Usable” in proposed paragraph Q6.4c should be extended to include the capability of any appropriate Interconnectors.
3. In paragraph 6.4 c the “Total Output Usable” may not be the sum of “Zonal Output Usables” for all the zones. This is because the zones may overlap each other causing duplication, or a Genset may not be included in any System Zone. Hence the section should end with the word “Gensets;” and the words “in all Transmission Zones of Output Usable” should be deleted.
4. Section 6.4.2 defines data, frequency and target times defined in the Grid Code, and these could be subject to review in the future. The effect of including this timetable in the BSC will be to make it more difficult to undertake a review of the OC2 process, as any changes to the Grid Code OC2 process will require a subsequent BSC modification. We would recommend that the data, frequency and target times should all be “as defined in the Grid Code”. If this is not possible and the BSC drafting needs to specify the data and the target times separately from the Grid Code it will be important to all allow flexibility in the frequency column. We would suggest the frequency column could read “to match the publication frequency under the Grid Code up to a maximum of (daily/weekly/twice yearly *depending on the data item*)”.
5. One particular issue with reference to the issues mentioned in paragraph 4 is that the current OC2 process only requires “2-49 day ahead daily Zonal Output Usable for each Transmission Zone (OU) and Daily Total Output Usable – daily peak half hour values” to be sent out under certain circumstances. We do not regularly calculate this data and we do not want to be obliged to produce this data for the BSC when it is not required under the Grid Code.
6. Daily data will only be sent on business days, with weekends and bank holidays submitted on the last business day prior to the day in question. Weekly data will be submitted by 17:00 on Friday of the week in question. No time should be specified against the 1-2 year ahead weekly data and the 3-5 year ahead weekly data in the table in 6.4.2. The Grid Code requirement is to send out this data by the end of the appropriate week. The weeks are not exactly six months apart so it may be better to indicate that the frequency is twice per year.
7. Similar comments to the table in Q6.4.2 are applicable to Table 8 in Annex V-1.

Nigel Brooks

9 October 2001

## P22\_MR\_011 – Powergen

Powergen UK Plc has supplied the following comments on behalf of itself and the following BSC Parties: Powergen Energy plc, Diamond Power Generation Limited and Cottam Development Centre Limited.

I would like the group to know that Powergen support the Alternative Modification Proposal. Powergen would also have preferred the resultant data to have been published on the BMRS as we believe that the BMRS should be the preferred place for market information. However, we acknowledge that the somewhat large differences in cost preclude the use of the BMRS and publishing such data on the Elexon website is the only viable option.

regards  
chris price