

June 2001

**INITIAL ASSESSMENT OF
MODIFICATION PROPOSAL P20 -
Revision of Obligations of Parties in
Relation to BM Unit Registrations**

Prepared by ELEXON Limited

Document Reference	IWA 020
Version no.	VersionNumber 1.0
Issue	Issue 1
Date of Issue	21 June 2001
Reason for Issue	Panel Consideration
Author	ELEXON Limited

I DOCUMENT CONTROL

a Authorities

Version	Date	Author	Signature	Change Reference
1.0	21/06/01	Ceri Hughes		Final Version for Panel

Version	Date	Reviewer	Signature	Responsibility
		Richard Haigh		
		Neil Cohen		
1.0	21/06/01	Cathy Woods		Legal
		Gareth Forrester		Modifications

b Distribution

Name	Organisation
Each BSC Party	Various
Each BSC Agent	Various
The Gas and Electricity Markets Authority	Ofgem
Each BSC Panel Member	Various
energystatus	Energystatus
Core Industry Document Owners	Various

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II CONTENTS TABLE

I	Document Control.....	2
a	Authorities.....	2
b	Distribution.....	2
c	Intellectual Property Rights and Copyright.....	2
II	Contents Table	3
1	Summary	4
2	Introduction.....	5
3	Purpose and Scope of the Report	6
4	Description of the Modification Proposal.....	7
5	Impact on BSC Systems and Processes.....	8
6	Impact on Other Systems and Processes Used by Parties.....	9
7	Impact on Documentation	10
7.1	Impact on Balancing and Settlement Code	10
7.2	Impact on Code Subsidiary Documents	13
7.3	Impact on Core Industry Documents.....	14
8	Impact on Other Configurable Items	15
9	Impact on ELEXON.....	16
10	Impact on Financial Arrangements and Budget	17
11	Impact on BSC Agent Contractual Arrangements	18
12	Process and Timetable for Progressing the Proposal.....	19
	Annex 1 – Modification Proposal.....	21

1 SUMMARY

The Proposer, London Electricity plc, has identified the following impacts on the Balancing & Settlement Code as a result of P20:

- a) Section K, 1.2
- b) Section K, 2.2

ELEXON has undertaken an initial assessment of the impact of the Modification on the Code, the Core Industry Documents, the Code Subsidiary Documents and other Configurable items. An initial assessment of Modification Proposal P20 has identified the following potential areas of impact and issues to be considered:

- the main area of impact will be on Sections K, P and M of the Balancing & Settlement Code.
- there is also a potential impact on the Grid Code, the MRA, BSCP15 and BSCP71, and the CRA Service Description, CRA User Requirement Specification, and CRA Operating Procedures.

It is recommended that the Modification Proposal is progressed as follows:

- through the Assessment Procedure (as defined in the BSC, section F2.6); and
- the Assessment Report be submitted to the Panel Meeting on 26 July 2001;

To support the assessment procedure the proposal should be considered by the appropriate Modifications Group (in accordance with Section F2.4) based on the nominated expert lists.

2 INTRODUCTION

This Report has been prepared by ELEXON Ltd. on behalf of the Balancing and Settlement Code Panel ('the Panel'), in accordance with the terms of the Balancing and Settlement Code ('BSC'). The BSC is the legal document containing the rules of the balancing mechanism and imbalance settlement process and related governance provisions. ELEXON is the company that performs the role and functions of the BSCCo, as defined in the BSC.

An electronic copy of this document can be found on the BSC website, at www.elexon.co.uk

3 PURPOSE AND SCOPE OF THE REPORT

Section F of the BSC sets out the procedures for progressing proposals to amend the BSC (known as 'Modification Proposals'. These include procedures for proposing, consulting on, developing, evaluating and reporting to the Authority on potential modifications.

The BSC Panel is charged with supervising and implementing the modification procedures. ELEXON provides the secretariat and other advice, support and resource required by the Panel for this purpose. In addition, if a modification to the Code is approved or directed by the Authority, ELEXON is responsible for overseeing the implementation of that amendment (including any consequential changes to systems, procedures and documentation).

When a new proposal to modify the BSC is made, it is the responsibility of the Panel to determine how it should be progressed. Options include submitting the proposal to a Definition Procedure¹, submitting it to an Assessment Procedure², amalgamating the proposal with another proposal³, or proceeding directly to the Report Phase⁴. With a view to assisting the Panel in taking this decision, ELEXON prepares this initial written assessment of the implications of the Modification Proposal as soon as reasonably practicable after the proposal is made⁵. ELEXON endeavours to complete this initial assessment such that it can be reviewed by the Panel at the Panel meeting at which the relevant Modification Proposal is first to be considered.

This initial assessment provides a preliminary view on the following:

- the potential impact of the proposed modification on BSC systems and processes;
- the potential impact of the proposed modification on other systems and processes used by Parties;
- the potential impact of the proposed modification on the BSC, Code Subsidiary Documents and Core Industry Documents;
- the potential impact of the proposed modification on ELEXON;
- the potential impact of the proposed modification on BSC financial arrangements and budget;
- the potential impact of the proposed modification on BSC Agent contractual arrangements;
- The process and timetable that should be adopted for the progression of the Modification Proposal, in light of its complexity, importance and urgency; and
- Issues that will need to be considered and addressed in progressing the Modification Proposal (including the potential need for impact assessments, consultation and analyses).

It should be noted that, as this document only represents a preliminary assessment of the Modification Proposal, the information contained herein will, in most cases, be superseded by the subsequent analysis and reports produced by the Modification Group to which the Panel assigns the proposal for consideration.

¹ see BSC F2.5

² see BSC F2.6

³ see BSC F2.3

⁴ see BSC F2.7

⁵ see BSC F2.1.8

4 DESCRIPTION OF THE MODIFICATION PROPOSAL

London Electricity plc proposes that BM Units and Metering Systems should also be able to be registered in the name of a BSC Party that is an Affiliate of the BSC Party responsible (pursuant to paragraph K1.2.2 of the Balancing & Settlement Code) for the exports or imports of electricity at the relevant Boundary Point.

A copy of the Modification Proposal, as submitted by its proposer, can be found at Annex 1 to this report.

5 IMPACT ON BSC SYSTEMS AND PROCESSES

BSC System / Process	Potential Impact of Proposed Modification
Registration	Changes would be required to allow for an Affiliate to register BM Units and Metering Systems
Contract Notification	No impact.
Credit Checking	Potential impact on the level of Credit Cover required and therefore Credit Checking processes
Balancing Mechanism Activities	No impact
Collection and Aggregation of Metered Data	Potential impact
Supplier Volume Allocation	No impact.
Settlement	No impact.
Clearing, Invoicing and Payment	No impact.
Reporting	No impact.
Contingencies	No impact.
Dispute Resolution	No impact.

6 IMPACT ON OTHER SYSTEMS AND PROCESSES USED BY PARTIES

System / Process	Potential Impact of Proposed Modification
All	No impact.

7 IMPACT ON DOCUMENTATION

7.1 Impact on Balancing and Settlement Code

BSC Section	Potential Impact of Proposed Modification
A: Parties and Participation	No impact.
B: The Panel	No impact.
C: BSCCo and its Subsidiaries	No impact.
D: BSC Cost Recovery and Participation Charges	No impact.
E: BSC Agents	No impact.
F: Modification Procedures	No impact.
G: Contingencies	No impact.
H: General	Potentially changes may be required to place additional obligations on the Affiliate to ensure that its status did not undermine the general intent of the BSC with regard to default procedures, audit etc. For example, if the Affiliate was the Lead Party, it would also have to have the authority from the Party who actually owned the Metering Systems and BM Units to allow access to the Auditor under paragraph H5, or to authorise de-energisation if ordered to do so by the Panel under paragraph H3.2.2(d) following a finding of material default under paragraph H3.
I: Not Used	No impact.
J: Party Agents	No impact.

BSC Section	Potential Impact of Proposed Modification
K: Classification and Registration of Metering Systems and BM Units	<p>Changes would be required to allow an Affiliate of a Party responsible for exports or imports of electricity at a Boundary Point to register the relevant BM Units and Metering Systems. Clauses impacted/potentially impacted are:</p> <ul style="list-style-type: none"> • 1 – Introduction; • 1.2 - Obligations of Parties; • 2.2 - Registration Requirements (CMRS); • 2.4 – Registration in SMRS; • 3 - Configuration and Registration of BM Units; and • 7 – Failing Supplier Process.
L: Metering	Paragraph 1.4 relating to third party generating plant may need to be extended to oblige a third party to obtain the necessary rights relating to access.
M: Credit Cover and Credit Default	<p>The Modification states (item 3 of description of issue) that the 'level of Credit Cover required to operate via one registration is necessarily less than the infrastructure required for two or more separate organisations'. This could result in potentially reduced Credit Cover being required or alternatively the Lead Party providing a group Credit Cover. If this is the case then potentially the Credit Cover rules in this Section may need to be revised. However do not believe that the net result should be different ie. the aggregate level of Credit Cover will be the same, which is not what's being implied in the Modification.</p> <p>Clauses impacted / potentially impacted are:</p> <ul style="list-style-type: none"> • 1.2 – Energy Indebtedness; • 1.3 – Authority of Steps under Section M and P; • 1.6 – Import and Export Capabilities; • 2 – Provision of Credit Cover; • 3 – Credit Default Status; and • 4 – Credit Cover Errors and Compensation
N: Clearing, Invoicing and Payment	No impact.
O: Communications	No impact.

BSC Section	Potential Impact of Proposed Modification
P: Energy Contract Volumes and Metered Volume Reallocations	MVRNs are authorised by the Lead Party for the BM Unit to which it relates. If the Affiliate is also able to register the BM Unit, the question arises whether it is also able to authorise MVRNs. If it can, then this Section would need to be modified to allow for an Affiliate to be responsible for the Import and Export MS instead of the Lead Party, including any appropriate authorisation of that MVRN.
Q: Balancing Mechanism Activities	No impact.
R: Collection and Aggregation of Metered Data from CVA Metering Systems	No impact.
S: Supplier Volume Allocation	No impact.
S: ANNEX S-1 Performance Levels and Supplier Charges	No impact.
S: ANNEX S-2 Supplier Volume Allocation Rules	No impact.
T: Settlement and Trading Charges	No impact.
U: Provisions Relating to Settlement	No impact.
V: Reporting	No impact.
W: Trading Queries and Trading Disputes	No impact.
X: Definitions and Interpretation	There may be the need for additional definitions.
X: ANNEX X-1 General Glossary	No impact.
X: ANNEX X-2 Technical Glossary	No impact.

7.2 Impact on Code Subsidiary Documents

Code Subsidiary Document	Potential Impact of Proposed Modification
BSC Procedures	<p>a) BSCP15 BM Unit Registration</p> <p>This BSCP documents the processes associated with the registration and de-registration of BM Units (both at CVA and SVA). The role of the Affiliate in relation to the BM Unit would need clarification.</p> <p>b) BSCP71 ECVNA and MVRNA Registration, Authorisation and Termination.</p> <p>This BSCP documents the processes associated with the registration and de-registration of ECVNs and MVRNs. If the Affiliate is to submit MVRNs then a new process would be required to authorise and then track the appointment / de-appointment of the Affiliate</p>
Codes of Practice	No impact.
BSC Service Descriptions	No impact.
Party Service Lines	No impact.
Data Catalogues	No impact.
Communication Requirements Documents	No impact.
Reporting Catalogue	No impact.

7.3 Impact on Core Industry Documents

Core Industry Document	Potential Impact of Proposed Modification
Grid Code	The Grid Code currently assumes that the Lead Party is capable of operating / controlling the BM Unit, this may not be the case if an Affiliate is appointed. The assumptions / responsibilities would need to be changed to allow for the introduction of an Affiliate
MCUSA	Changes may be required to bring it line with any changes implemented in the Code.
Supplemental Agreements	No impact.
Ancillary Services Agreements	No impact.
Master Registration Agreement	No impact.
Data Transfer Services Agreement	No impact.
British Grid Systems Agreement	No impact.
Use of Interconnector Agreement	No impact.
Pooling and Settlement Agreement	No impact.
Settlement Agreement for Scotland	No impact.
Distribution Codes	No impact.
Distribution Use of System Agreements	No impact.
Distribution Connection Agreements	No impact.

8 IMPACT ON OTHER CONFIGURABLE ITEMS

Item	Potential Impact of Proposed Modification
CRA Service Description	Footnote 1, relating to clause 4.1.2 bracketed allows for a BM Unit to be split between participants and hence between Energy Accounts for the same participant. This is ambiguous and would need clarification. The Service Description would need to be modified to include the ability to register an Affiliate to the Import and Exports.
CRA User Requirement Specification	The CRA URS does not require the CRA to know or record the details / change details of the Affiliate Party. Changes would be required to clarify the role of the Affiliate
CRA Operating Procedures / Operating Services Manual and other Logica documentation	Changes would be required to these documents to clarify the role of the Affiliate.

9 IMPACT ON ELEXON

Area of Business	Potential Impact of Proposed Modification
ELEXON Systems	No impact.
ELEXON Procedures	No impact.
ELEXON Contracts (Excluding BSC Agent Contracts)	No impact.
Other (e.g. costs, staffing, etc.)	No impact.

10 IMPACT ON FINANCIAL ARRANGEMENTS AND BUDGET

No impact.

11 IMPACT ON BSC AGENT CONTRACTUAL ARRANGEMENTS

BSC Agent Contract	Potential Impact of Proposed Modification
Logica (BMRA, CRA, CDCA, SAA, ECVAA, TAA(CVA))	No impact.
EPPAL (FAA)	No impact.
ESIS (TAA(SVA))	No impact.
Cap Gemini (SVAA)	No impact.
PwC (BSC Auditor, Certification Agent)	No impact.
EASL (Teleswitch Agent, Profile Administrator)	No impact.

12 PROCESS AND TIMETABLE FOR PROGRESSING THE PROPOSAL

ELEXON recommends that this Modification Proposal proceed to the Assessment Phase and be submitted to the [Modification Group]. The Modification Group should be actioned to provide its report to the Panel by 26 July 2001.

13. ISSUES

There are a number of issues and questions that will need to be considered and addressed by the Modifications Group in progressing the Modification Proposal:

- Although not indicated in the proposal, this Modification requires fundamental principle changes to the Code which would allow the Exports or Imports connected with the BM Unit to be registered to the Affiliate's name and not the existing Lead Party. This is likely to be inconsistent with the Grid Code, and the licence regime. It is not within the Panel's remit to comment on the issue of the licence conditions, or to take a view on it. This is a regulatory issue for Ofgem. However, as it is likely to be commented on during the consultation process, the Panel should be aware of it.
- There is also some confusion over whether the Affiliate would become the Lead Party, or simply become responsible for the imports and exports. If the Affiliate doesn't become the Lead Party, the Code will need to differentiate between those responsibilities allocated to the Lead Party, and those allocated to the person responsible for the imports and exports.
- If the Affiliate does become the Lead Party, it is not clear how the Affiliate can have the responsibility to submit Physical Notifications (in accordance with the Grid Code) because the Affiliate does not any requirement to do so under the Grid Code. If the Affiliate is to become the Lead Party, the Grid Code must be changed as well. This could be difficult. However, the Affiliate could submit Physical Notifications in accordance with the Grid Code even though it's not bound by the Grid Code - i.e. the BSC requires Grid Code compliance. This is what happens for those Parties who are not bound by the Grid Code, but who choose to participate in the Balancing Mechanism. The problem is, that under the Grid Code, the original BSC Party will still be responsible for submitting Physical Notifications as well - i.e. the Affiliate will have to submit them in accordance with the BSC, and the original party in accordance with the Grid Code. This could be very confusing.
- The Modification appears to be inconsistent with the covering letter submitted by the Proposer. The covering letter appears to describe an Affiliate of a Party responsible for Imports and Exports at a BM Unit being the Lead Party for that BM Unit. The proposed change in the Modification, however, seems only to apply this principle to the registration of Metering Systems. The assumption has therefore been made that the Modification covers all aspects of registration responsibilities i.e. Metering Systems and BM Units, Trading Units etc.
- The issue of whether the Code discriminates on the basis of corporate structure has been raised by the Proposer and the Modifications Group should look at this claim.
- What are the costs of implementation?
- Are there any potential efficiencies in the implementation and administration of the BSC to be gained as purported in the Proposal?

- Is there a risk of mismatch with the Grid Code or the MRA given that that main focus of these documents is plant operators (Grid Code) or Suppliers (MRA)? Who is responsible for the BM Unit as far the Grid Code is concerned?
- Who is responsible for notifying the appointment / de-appointment of the Affiliate?
- What happens if the Affiliate goes into liquidation?
- What are the Credit Cover requirements where an Affiliate is registered rather than the Lead Party?
- Who can authorise Affiliate MVRNs?
- Should the status of the Affiliate be monitored?

ANNEX 1 – MODIFICATION PROPOSAL

Modification Proposal – F76/01	MP Number:20 <i>(mandatory by BSCCo)</i>
Title of Modification Proposal (<i>mandatory by originator</i>): Revision of Obligations of Parties in Relation to BM Unit Registrations	
Submission Date (<i>mandatory by originator</i>): 18 May 2001	
Date Logged (<i>mandatory by BSCCo</i>):	
Description of Proposed Modification (<i>mandatory by originator</i>): London Electricity ('London') proposes to clarify the position in relation to the registration of BM Units in the name of a BSC Party that is an affiliate of the company responsible for the exports or imports connected with that BM Unit.	
Description of Issue or Defect that the Modification Proposal Seeks to Address (<i>mandatory by originator</i>): There is currently some dispute within the industry regarding the complex area of which BSC Party a BM Unit should be registered to. Even Elexon has the need to carefully consider internally what position in response to this question it should take. Clarification of this issue would therefore be very useful for all parties involved. London believes that BSC parties should be able to register BM Units in the name of affiliated companies that are themselves a Party to the BSC, with the capacity of a Trading Party. This should have the following advantages for all such BSC parties: 1. it would place groups of companies that hold generation assets and supply businesses in separate companies in the same position as BSC parties that hold generation assets and supply businesses in the same company; 2. the risk management involved in the administration of one BM Unit is necessarily less than the risk management involved in managing two BM Units; 3. the information technology infrastructure and level of credit cover required to operate via one registration is necessarily less than the infrastructure required for two or more separate registrations; 4. the risk of information technology system failures is less if only one account is operated, rather than two or more separate accounts being operated.	

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Modification Proposal – F76/01	MP Number: <i>(mandatory by BSCCo)</i>
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Impact on Code (<i>optional by originator</i>):	
Section K1.2 will need to be redrafted to read as follows:	
1.2 Obligations of Parties in Relation to Exports and Imports	
1.2.1 Subject to the further provisions of this Section K, the Party responsible (in accordance with paragraph 1.2.2 below) for any Exports or Imports of electricity at a Boundary Point shall:	
(a) install, maintain and operate or secure that there is installed, maintained and operated, subject to and in accordance with Section L, Metering Equipment by which (over periods and otherwise in accordance with the further requirements of the Code) the quantities of such Exports and Imports separately can be measured, but subject to the provisions of Section S8 as to Unmetered Supplies;	
(b) register or procure the registration of the Metering System(s) which result or will result from installation of such Metering Equipment either in the name of the Party responsible (in accordance with paragraph 1.2.2 below) for any Exports or Imports of electricity, or in the name of a Party that is an affiliate of the Party responsible for any Exports or Imports of electricity (in accordance with paragraph 1.2.2 below);	
(c) establish and register BM Unit(s) comprising the relevant Plant and Apparatus in accordance with paragraph 3;	
(d) assign each BM Unit to a Trading Unit established and registered in accordance with paragraph 4.	
Section K2.2 will also need to be amended as follows:	
2.2 Registration requirements	
2.2.1 A Party may apply to register a Metering System in CMRS by submitting a registration application to the CRA specifying:	
(a) the identity of the Party to be registered as the Registrant;	
(b) the Metering System;	
(c) the Meter Operator Agent appointed or to be appointed in accordance with Section J6.1; and	
(d) the date with effect from which the applicant wishes the registration to be effective.	

Impact on Core Industry Documents (optional by originator):

London does not consider that any other Core Industry Documents would require amendment.

Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties (optional by originator):

London does not believe that the BSC systems would need to be adapted, since the BSC systems currently process information in this way.

Impact on Other Configurable Items (optional by originator):

London does not believe any other configurable items would be affected.

Modification Proposal – F76/01

MP Number:
(mandatory by
BSCCo)

Justification for Proposed Modification with Reference to Applicable BSC Objectives (mandatory by originator):

The Proposed Modification is consistent with the BSC objectives for the following reasons:

1. The Proposed Modification promotes effective competition in the generation and supply of electricity in that companies that hold generating and supply business assets in separate companies are placed in the same position as companies holding generating assets and supply businesses in one corporate vehicle in respect of the following factors:
 - the risk management of an equal number of balancing mechanism units;
 - the costs of its mission technology infrastructure;
 - the risk of IT system failure.
2. The Proposed Modification will provide efficiency in the implementation and administration of the BSC by reducing risk and costs involved in the implementation and administration of BSC processes for BSC parties.
3. In addition, the Proposed Modification complies with the objective of the BSC Panel to give effect to the Code without undue discrimination between parties or classes of Party. As mentioned above, the purpose of the Proposed Modification is to ensure a level playing field between corporate structures.

Details of Proposer:

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Details of Representative's Alternate:

Name **N/A**.....

Organisation

Telephone

e-mail address

Attachments: Yes (delete as appropriate) (mandatory by originator):

If Yes, Title and Number of Pages of Each Attachment:

Letter dated 18 May 2001 addressed to BSC Panel Chairman and headed REGISTRATION OF BM UNITS TO TRADING PARTIES AFFILIATED TO BSC PARTIES (three pages)

Mr Nicholas Durlacher
Chairman, BSC Panel
c/o Elexon Limited
Third Floor

RB/MVB

25 May 2001

1 Triton Square
London NW1 3BX

Dear Mr Durlacher

REGISTRATION OF BM UNITS TO TRADING PARTIES AFFILIATED TO BSC PARTIES

As some Panel Members may be aware, London Electricity plc ('London') has been in correspondence with Elexon regarding the registration of balancing mechanism units in the name of London rather than in the name of the wholly owned subsidiaries of London that hold the electricity generation licences in respect of the relevant generating stations.

The purpose of this letter is to ask the BSC Panel to exercise its discretion under Section K1.2.2(a)(iv) of the Balancing and Settlement Code (BSC) so as to clarify the above position. While the facts of this case are specific to London, it should be noted that we are not the only company group that holds generating assets and supply businesses in separate corporate vehicles.

As the Panel Members will be aware, the public electricity supply licence held by London prohibits London from conducting any business or carrying on any activity other than the supply business, the second tier supply business, and the distribution business (Condition 72.1). The effect of this is that London, by virtue of that requirement, is prevented both from carrying on any generation business and from transferring any generation assets to itself.

For ease of reference, Condition 72.2(a) addresses the position of subsidiaries in which the generation assets of the London Group are held.

While London is not questioning the licensing position, we do believe that the BSC should allow London (and, of course, any other company in the same position as London) to register an affiliated company as the party responsible for a balancing mechanism unit. Our view is that, in principle, a BSC Party should be entitled to register balancing mechanism units in the name of an affiliate who as a Trading Party is also a BSC Party.

We also think that this is consistent with BSC requirements. Section K2.2 sets out the registration process. A BSC Party may apply to the Central Registration Agent (CRA) to register a metering system in the Central Meter Registration Service, specifying, inter alia, the name of the applicant party. We maintain that if the only name that can be submitted under these procedures is that of the company making the application, then the requirements would not need to specify that the name of the applicant is required, as the CRA would already have this information.

Although this is a complex issue, Elexon initially concurred with this approach. Having reconsidered the matter, Elexon has now concluded that the BSC does not currently permit this position. London disagrees with this conclusion, and believes that its preferred approach gives the following advantages:

1. It places companies that hold generation assets and supply businesses in separate corporate vehicles in the same position as companies holding generation assets and supply businesses in the same corporate vehicle.
2. The enhanced IT infrastructure costs and sub-optimal credit cover costs involved in the separate registration of balancing mechanism units would be avoided.
3. The risk of IT system failure will be minimised by maintaining only one system, rather than several.
4. The management time and costs of supervising a single registration will necessarily be less than those of maintaining several.

London therefore believes that enabling BSC parties to operate in its preferred manner would meet the following BSC and Panel objectives:

1. It will help to promote effective competition in the generation and supply of electricity by ensuring that parties which have different corporate structures are placed in the same position.
2. It will promote efficiency in the implementation and administration of the Balancing and Settlement Code.
3. It will give effect to the BSC itself without undue discrimination between public electricity suppliers and other energy companies with different corporate structures.

London wishes to emphasise that interpreting the BSC in its preferred manner will not lead to a reduction in the fees paid, in aggregate, by companies within the London Group. Nor are we seeking to avoid or reduce any obligations (including regulatory obligations) borne by London or any affiliated company. The sole purpose of the exercise is to establish the most efficient method of operating the registration and notification procedures under the BSC.

We have received Elexon's notice dated 21 May (to which this submission is our response) that we are in breach of the BSC. Even if that view is correct, which we do not accept, we would not regard the breach of the Code as material within the requirements under Section C for Code enforcement, since it is difficult to see how there could be any material adverse effect on the operation of the BSC consistent with the Section B objectives.

It would be helpful, however, to have the matter resolved beyond any possible doubt. London, therefore, invites the BSC Panel to exercise its discretion under Section K1.2.2(a)(iv) to determine that London's position is not in fact the same as the case set out in Section K1.2.2(a)(i) and that it is in accordance with the objectives of the BSC that London can operate in this way.

As an alternative, we have drafted a modification proposal which would permit BSC parties to register balancing mechanism units in the name of an affiliate who is also a BSC Party. If the Panel is unwilling to exercise its discretion in the manner requested, London will propose the enclosed modification.

If you or other Panel Members have any questions in relation to the above, we would be happy to deal with them. We look forward to hearing from you.

Yours sincerely

Roger Barnard
Roger Barnard
Regulatory Law Manager, London Electricity Group
on behalf of London Electricity, Jade Power
Generation, and Sutton Bridge Power
