

20 July 2001

**ASSESSMENT REPORT**  
**MODIFICATION PROPOSAL P017 –**  
**ECVNAs to Receive 7 Day Report**

Prepared by the Contract Notification Modification  
Group on behalf of the Balancing and Settlement  
Code Panel

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### b Distribution

Name	Organisation
BSC Panel	

### c References

Reference	Document
Reference 1	Modification Proposal P017 'ECVNAs to Receive 7-Day Report'
Reference 2	'Initial Assessment of Modification Proposal P017 'ECVNAs to Receive 7-Day Report'' IWA017
Reference 3	'P017 Requirements Specification for Receipt by Notification Agent of the Forward Contract Report' 017AAR V1.0
Reference 4	'Modification Proposal P017 Project Brief' O11AMB V1.0
Reference 5	MP4 Requirements for Enhanced ECVA Reporting 015AAR V2.0

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## 1 SUMMARY AND RECOMMENDATIONS

### 1.1 Recommendations

On the basis of the analysis, consultation and assessment undertaken in respect of this Modification and the Alternative Modification during the Assessment Procedure, and the resultant findings of this report, the Modification Group recommends that the BSC Panel should:

- **Proceed to the Report Phase;**
- **Recommend to the Authority that the Alternative Modification be approved and hence reject the original Modification;**
- **Approve the Alternative Modification, which is based on the provision of the Forward Contract Report to both the Energy Contract Volume Notification Agents and Metered Volume Reallocation Notification Agents;**
- **Recommend that the implementation of the Alternative Modification be included in the scope of the ELEXON BSC Systems Release 2 Project;**
- **Recommend that the proposed implementation date for the Alternative Modification be consistent with that of the ELEXON BSC Systems Release 2 Project, currently estimated as February 2002; and**
- **Note the indicative implementation cost of £265,000, comprising £185,000 for BSC Agent System development and £80,000 for ELEXON development and implementation within the ELEXON BSC Systems Release 2 Project.**

### 1.2 Background

Modification Proposal P017 (Reference 1), raised on the 23<sup>rd</sup> May 2001, proposed allowing the Energy Volume Contract Notification Agent to receive an appropriate version of the Forward Contract Report (or '7 Day Report'). The purpose of such amendment would be to place the Energy Contract Volume Notification Agents on a level footing with BSC Parties with regards to the reports received from ECVAAs and to therefore enable an Energy Contract Volume Notification Agent to ensure / confirm that there are no errors or omissions in the notifications submitted by that Energy Contract Volume Notification Agent.

The Initial Written Assessment for the Modification P017 (Reference 2) was submitted to the BSC Panel Meeting of the 28 June 2001 recommending that:

- The Modification be submitted to the Assessment Procedure under the Contract Notification Modification Group (CNMG),
- The Assessment Report for the Modification P017 be submitted to the BSC Panel Meeting of the 26<sup>th</sup> July 2001.

The BSC Panel endorsed such recommendations and this Modification proceeded to the Assessment Procedure.

The Contract Notification Modification Group (CNMG) met on Wednesday 20<sup>th</sup> June 2001 to define the requirements for the implementation of the P017 Modification and subsequently the P017 Requirements

Specification 'P017 Requirements Specification for Receipt by Notification Agent of the Forward Contract Report' 017AAR (Reference 3) was drafted and approved by the CNMG. It should be noted that the approved Requirements Specification included an extension to the scope of the Modification to include the requirements to cover receipt of an appropriate version of the Forward Contract Report by the Metered Volume Reallocation Notification Agent, with a view to determining the impact and costs of such extension of scope, with such extension to scope considered as an Alternative Modification.

The Requirements Specification was issued for Industry wide Impact Assessment on 29 June 2001 and it is the responses from that Impact Assessment and the subsequent agreement of the CNMG, at their meeting of the 18<sup>th</sup> July 2001, that form the basis of this Assessment Report.

### **1.3 Rationale for Recommendations**

The CNMG considered and assessed the Modification and the Alternative Modification and took into consideration the responses from the Initial Consultation. Therefore the following represents the progression of the CNMG with regards to the decisions taken by the Group and the subsequent recommendations made.

The CNMG agreed that both the Modification and the Alternative Modification better met the objectives of the Balancing and Settlement Code than the current arrangements, as both the Modification and the Alternative Modification better achieve the Transmission Licence Condition 7A 3(c) 'promoting effective competition in the generation and supply of electricity and (so far as is consistent therewith) promoting such competition in the sale and purchase of electricity', by:

- Redressing an inequality in the provision of reports from ECVAAs, by providing the Forward Contract Report to Notification Agents.
- Enabling Notification Agents to determine errors and omissions in the notifications submitted by them to ECVAAs and therefore enabling them to rectify such errors. This should increase BSC Party confidence in the quality of data with regards to contract notifications and may have an associated affect of increasing liquidity in notifications by increased confidence in utilisation of third party Notification Agents.

The CNMG also noted that both the Modification and the Alternative Modification also better achieve the Transmission Licence Condition 7A 3(d) 'promoting efficiency in the implementation and administration of the balancing and settlement arrangements', by potentially reducing the number of Trading Queries and Trading Disputes raised with BSCCo, as a result of the Notification Agent being able to identify and rectify such errors and omissions before they necessitate such a dispute.

The CNMG considered whether alternative solutions could better meet the objectives of the Balancing and Settlement Code and the Modification. However, the CNMG determined that the P017 Modification was the most efficient mechanism for meeting the objectives of the Modification and the Balancing and Settlement Code, and the Modification was adopted as drafted. However, it should be noted that the scope of the requirements was extended to include Metered Volume Reallocation Notification Agents to determine whether there was a requirement for them to receive such Forward Contract Report and to determine the impact of extending the scope of such provision, and as this differed from the original Modification, this was considered to be an Alternative Modification.

The CNMG also considered the interaction of the Modification and Alternative Modification with other Modifications, namely the 'Enhanced ECVAAs Reporting' (Reference 5) stream of Modification P004 'Dual Contract Notification' and the CNMG agreed that there is significant overlap. However, the CNMG agreed that both Modifications for P017 provide significant benefit to third party Notification Agents and

represent a much smaller change to functionality (with respect to both Party Agent and Central Services functionality), with potentially shorter implementation timeframes than Modification P004.

The CNMG also recognised that the enhanced reporting proposals within Modification P004 intend that the enhanced reporting be provided to both BSC Parties and to Notification Agents, therefore the CNMG agreed that both the Modifications under P017 are a necessary precursor to get Notification Agents to the point where they obtain full benefit from the proposal made under P004.

The CNMG reviewed the Initial Consultation responses with specific regards to those concerning the implementation costs of such a change to the Central Services. The CNMG noted the comments made from BSC Parties stating that they did not wish to incur the costs, via the BSCCo cost recovery mechanisms under the provision of the Code, of implementing a new interface that they would not need to utilise. However, the CNMG agreed that as both Modifications under P017 are endeavouring to redress an error / inequality in the application of the Trading Arrangements, the implementation costs for correction of such error / inequality should be borne by all BSC Parties according to the current financial arrangements. It was also noted by the CNMG that amending allocation of the costs associated with implementing either the Modification or the Alternative Modification under P017 would require an additional Modification to be raised and this was therefore considered not to lie within the scope of the original proposal.

The CNMG also noted, with reference to concerns arising regarding individual implementation costs, that both the Modification and Alternative Modification under P017 had been specifically designed to ensure that the solution only impacted those individual parties / Party Agents who wished to receive the new 'Notification Agent Forward Contract Report'. Those Parties / Party Agents not wishing to receive such new interface would not be required to implement functionality to support it, and were therefore not impacted in anyway.

Based upon the Impact Assessment and Consultation responses, the CNMG determined to progress the Alternative Modification, which includes provision of the Forward Contract Report to the Metered Volume Reallocation Notification Agent, as well as covering the original Modification's requirement to provide such report to the Energy Contract Volume Notification Agent. This determination was a result of the ECVAAs BSC Agent impact assessment indicating that the extension of scope to include Metered Volume Reallocations and Metered Volume Reallocation Agents would increase the cost by 12% and extend the implementation timeframes by 1 week (from 15 weeks to 16). This increase to both costs and timescales was considered to be worthwhile considering the additional benefit this would achieve.

The CNMG therefore reviewed the implementation options and potential implementation date for the Alternative Modification and determined that implementation within the ELEXON BSC System Release 2 Project presented the most efficient and cost effective mechanism, potentially reducing the NETA Central Service Agents costs and timescales, as well as reducing ELEXON Project costs for the development and implementation of the Alternative Modification. Therefore the CNMG determined that they would make a strong recommendation that the Alternative Modification be included in the ELEXON BSC System Release 2 Project and noted that the associated implementation date for the Alternative Modification would be consistent with the BSC System Release 2 implementation date, currently planned to be February 2002.

In reaching these conclusions the CNMG has taken due account of the views of the:

- Proposer;
- All representations from interested Parties; and
- The Contract Notification Modification Group itself.

## **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](http://www.elexon.co.uk)

### 3 PURPOSE AND SCOPE OF THE REPORT

BSC Section F 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).

The Panel may decide to submit a Modification Proposal to an 'Assessment Procedure'<sup>1</sup>. Under this procedure, a Modification Group is tasked with undertaking a detailed assessment of the proposal to evaluate whether it better facilitates achievement of the Applicable BSC Objectives<sup>2</sup>. The group may also develop an alternative proposal if it believes that the alternative would better facilitate achievement of the objectives.

The Modification Group must prepare a report for the Panel, setting out the results of the assessment of the modification proposal and any alternative. The following matter should be included (to the extent applicable to the proposal in question)<sup>3</sup>:

- (a) an analysis of and the views and rationale of the Modification Group as to whether (and, if so, to what extent) the Proposed Modification would better facilitate achievement of the Applicable BSC Objective(s);
- (b) a description and analysis of any Alternative Modification developed by the Modification Group which, as compared with the Proposed Modification, would better facilitate achievement of the Applicable BSC Objective(s) and the views and rationale of the Group in respect thereof;
- (c) an assessment or estimate (as the case may be) of:
  - (i) the impact of the Proposed Modification and any Alternative Modification on BSC Systems;
  - (ii) any changes and/or developments which would be required to BSC Systems in order to give effect to the Proposed Modification and any Alternative Modification;
  - (iii) the total development and capital costs of making the changes and/or delivering the developments referred to in paragraph (ii);
  - (iv) the time period required for the design, build and delivery of the changes and/or developments referred to in paragraph (ii);
  - (v) the increase or decrease in the payments due under the BSC Agent Contracts in consequence of the Proposed Modification and any Alternative Modification;
  - (vi) the additional payments (if different from those referred to in paragraph (v)) due in connection with the operation and maintenance of the changes and/or developments to BSC Systems as a result of the Proposed Modification and any Alternative Modification;

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<sup>1</sup> See BSC F2.6

<sup>2</sup> As defined in the Transmission Licence

<sup>3</sup> See BSC F2.6.4 and Annex F-1

- (vii) any other costs or liabilities associated with BSC Systems attributable to the Proposed Modification and any Alternative Modification;
- (d) an assessment of:
- (i) the impact of the Proposed Modification and any Alternative Modification on the Core Industry Documents;
  - (ii) the changes which would be required to the Core Industry Documents in order to give effect to the Proposed Modification and any Alternative Modification;
  - (iii) the mechanism and likely timescale for the making of the changes referred to in paragraph (ii);
  - (iv) the changes and/or developments which would be required to central computer systems and processes used in connection with the operation of arrangements established under the Core Industry Documents;
  - (v) the mechanism and likely timescale for the making of the changes referred to in paragraph (iv);
  - (vi) an estimate of the costs associated with making and delivering the changes referred to in paragraphs (ii) and (iv),
- together with a summary of representations in relation to such matters;
- (e) an assessment of:
- (i) the likely increase or decrease in BSC Costs (to the extent not already taken into account in paragraph (c) above) in consequence of the Proposed Modification and any Alternative Modification;
  - (ii) the changes required to Systems and processes of BSCCo in order to give effect to the Proposed Modification and any Alternative Modification; and
  - (iii) the BSC Costs which are expected to be attributable to the implementation of the Proposed Modification and any Alternative Modification, to the extent not taken into account under any other provision above;
- (f) to the extent such information is available to the Modification Group, an assessment of the impact of the Proposed Modification and any Alternative Modification on Parties in general (or classes of Parties in general) and Party Agents in general, including the changes which are likely to be required to their internal systems and processes and an estimate of the development, capital and operating costs associated with implementing the changes to the Code and to Core Industry Documents;
- (g) an assessment of the Proposed Modification and any Alternative Modification in the context of the statutory, regulatory and contractual framework within which the Code sits (taking account of relevant utilities, competition and financial services legislation);
- (h) a summary of the representations made by Parties and interested third parties during the consultation undertaken in respect of the Proposed Modification and any Alternative Modification and the views and comments of the Modification Group in respect thereof;
- (i) a summary of the analysis and impact assessment prepared by the Transmission Company and the views and comments of the Modification Group in respect thereof;

- (j) a summary of the impact assessment prepared by relevant BSC Agents and the views and comments of the Modification Group in respect thereof;
- (k) a summary of any impact assessment prepared by Core Industry Document Owners and the views and comments of the Modification Group in respect thereof;
- (l) a copy of the terms of reference and any report or analysis of external consultants or advisers engaged in respect thereof;
- (m) a list of the key assumptions which the Modification Group has made in formulating its views;
- (n) any other matters required by the terms of reference of such Modification Group;
- (o) any other matters which the Modification Group consider should properly be brought to the attention of the Panel to assist the Panel in forming a view as to whether the Proposed Modification and any Alternative Modification would better facilitate achievement of the Applicable BSC Objective(s);
- (p) subject to paragraph 2.6.8 and 2.6.9 of Section F of the BSC, the proposed text to modify the Code in order to give effect to the Proposed Modification and any Alternative Modification, together with a commentary setting out the nature and effect of such text and of other areas of the Code which would be affected by the changes;
- (q) the Modification Group's proposed Implementation Date(s) for implementation (subject to the consent of the Authority) of the Proposed Modification and any Alternative Modification;
- (r) an executive summary of the project brief prepared by BSCCo;
- (s) a recommendation (where applicable) as to whether, if the Proposed Modification or Alternative Modification is approved, Settlement Runs and Volume Allocation Runs carried out after the Implementation Date of such Approved Modification in respect of Settlement Days prior to that date should be carried out taking account of such Approved Modification or not;
- (t) the proposed text (if any) to modify the Memorandum and Articles of Association of BSCCo and/or the BSC Clearer in order to give effect to the Proposed Modification and any Alternative Modification, together with a commentary setting out the nature and effect of such text and of other areas of the Memorandum and Articles of Association and/or the Code which would be affected by the changes; and
- (u) a summary of any changes which would be required to Code Subsidiary Documents as a consequence of such Proposed Modification or Alternative Modification.

This Assessment Report therefore addresses all of the above items to the extent relevant to the Modification Proposal in question.

#### 4 MODIFICATION GROUP DETAILS

This Assessment Report has been prepared by the Contract Notification Modification Group. The Membership of the Modification Group was as follows:

<b>Member</b>	<b>Organisation</b>
Justin Andrews	Chairman ELEXON
Mandi Francis	Analyst ELEXON
Derek Myers	Proposer - PowerEx Limited
Tim Johnson	PowerGen
Simon Hadlington	British Gas Trading
Ben Willis	Yorkshire Electricity
Sharif Islam	TotalFinaElf
Dave Lenton	St Clements Services
Roy Dinsmore	Innogy
Chris Teverson	The European Power Source Company (UK) Ltd
Nicola Lea	TXU Europe Energy Trading
Paul Mott	London Electricity
Mike Edgar	Transmission Company
Mark Simons	BP Gas Marketing
Nick Simpson	Ofgem
Sonia Brown	Ofgem

## **5 DESCRIPTION AND ASSESSMENT AGAINST THE APPLICABLE BSC OBJECTIVES**

### **5.1 Assessment of the Modification and the Alternative Modification against the Applicable BSC Objectives**

As part of the assessment of the Modification, the CNMG reviewed the objectives of the Modification against the Objectives of the BSC, as defined in the Transmission Licence Condition 7A, paragraph (3).

The CNMG agreed that both the Modification and the Alternative Modification better met the objectives of the Balancing and Settlement Code than the current arrangements, as both the Modification and the Alternative Modification better achieve the Transmission Licence Condition 7A 3(c) 'promoting effective competition in the generation and supply of electricity and (so far as is consistent therewith) promoting such competition in the sale and purchase of electricity', by:

- Redressing an inequality in the provision of reports from ECVAA, by providing the Forward Contract Report to Notification Agents.
- Enabling Notification Agents to determine errors and omissions in the notifications submitted by them to ECVAA and therefore enabling them to rectify such errors. This should increase BSC Party confidence in the quality of data with regards to contract notifications and may have an associated affect of increasing liquidity in notifications by increased confidence in utilisation of third party Notification Agents.

The CNMG also noted that both the Modification and the Alternative Modification also better achieve the Transmission Licence Condition 7A 3(d) 'promoting efficiency in the implementation and administration of the balancing and settlement arrangements', by potentially reducing the number of Trading Queries and Trading Disputes raised with BSCCo, as a result of the Notification Agent being able to identify and rectify such errors and omissions before they necessitate such a dispute.

The CNMG noted that the Alternative Modification better facilitated the Applicable Objectives of the BSC than the original Modification, by the extension of scope to include provision of the 'Notification Agent Forward Contract Report' to Metered Volume Reallocation Notification Agents. Such extension further redresses the inequality in the provision of reports by including both types of Notification Agent, and extends the ability to identify and rectify errors and omissions in submitted notifications to the Metered Volume Reallocation Notification Agent, rather than limiting such capability to the Energy Contract Volume Notification Agent. This therefore reduces the potential for Trading Queries and Trading Disputes to be raised on Metered Volume Reallocations, and therefore better facilitates Condition 7A (3) (d) than the original Modification.

### **5.2 The Proposed Modification**

The following is a direct extract from the Requirements Specification for Modification Proposal P017, 017AAR (Reference 3). It should be noted that this Requirements Specification does not include specific reference to the Alternative Modification, but refers to it as an extension to scope of the original Modification. This is due the CNMG wishing to determine the implications of extending the scope of the original Modification Proposal P017, before making the decision as to whether to create the Alternative Modification.

### **5.2.1 Modification Requirements Specification Overview**

The Requirements Specification provides the definition of the changes required to support the implementation of the solution to Modification Proposal P017 (Reference 3). This section is an extract from the Requirements Specification.

The Respondents to the Initial Consultation of the Modification placed a number of conditions on the development of any solution to the Modification, these were:

- The Notification Agent Forward Contract Report should contain only those 'trades' that the Notification Agent has notified, therefore ensuring data confidentiality for BSC Parties
- Receipt of the Report should be optional.
- There should be no possibility of confusing the Notification Agent Forward Contract Report with that for BSC Parties
- There should be no change to the format of the E0221 to BSC Parties

These requirements are met in entirety by this solution.

The P017 Modification Proposal specified the requirement for the Forward Contract Report to Energy Contract Volume Notification Agents only. The CNMG discussed potentially extending this to include Metered Volume Reallocation Notification Agents. The CNMG determined that this may, or may not, be an insignificant extension to the scope of the report, in terms of implementation timescales and costs, and the CNMG therefore agreed to include requirements for the option of the Notification Agent Forward Contract Report being provided to MVRNAs, to get an indication of the potential impact on costs and timescales, and to obtain an assessment from Notification Agents as to whether this addition would provide requisite benefit to MVRNAs.

### **5.2.2 Implementation and Maintenance of the Notification Agent Forward Contract Report**

Once the Notification Agent Forward contract Report interface has been implemented, the new report should be treated as a variant of the Forward contract Report for BSC Parties, i.e. the Notification Agent Forward Contract Report and the existing BSC Party Forward Contract Report (ECVAA-I022 / E0221) should be kept in step. Therefore at the time of implementing this new interface into ECVAA, the implementation should reflect the state of the E0221 at the time of implementation and any subsequent amendments to the E0221 (for example, those required under Modification Proposal P004) should be applied to both the BSC Party Forward Contract Report and the Notification Agent Forward Contract Report, if appropriate. This therefore ensures that the data provided to both BSC Parties and Notification Agents is kept consistent.

This requirement also extends to report provision schedules and associated Service Levels, i.e. if the service levels surrounding provision of this report change for the existing Forward Contract Report (E0221), then the same service levels should be applied to the Notification Agent Forward Contract Report. The same applies if the schedule for provision of the existing Forward Contract Report changes, then the same schedule should apply to the provision of the Notification Agent Forward Contract Report.

### **5.2.3 Forward Contract Report Interface Requirements**

The structure and content of the Forward Contract Report for Notification Agents is based upon that of the existing E0221 (ECVAA-I022) to BSC Parties. However, as a consequence of the E0221 data being

provided only to the BSC Party, the E0221 indicates only the 'flow' of volumes to the other Counterparty to the notification. This format is therefore not suitable for provision 'as is' to the Notification Agent. Therefore a new interface is required. Thus the E0221 will be retained as is for BSC Parties.

The new interface should be based upon the E0221, but with the following amendments:

- New interface reference and name
- Removal of the EAC Group 'Energy Account Data', as it is not relevant to the Notification Agent (ECVNA or MVRNA)
- The OED 'Originator ECVNAA Data' Group does not need the data items 'ECVNAA BSC Party Sequence', 'Other BSC Party Id' or 'Other BSC Party P/C Flag', and these should therefore be replaced with data items equivalent to the 'Counterparty 1 Id', 'Counterparty 1 P/C Flag', 'Counterparty 2 Id' and 'Counterparty 2 P/C Flag'
- The OMD 'Originator MVRNAA Data' Group does not need the 'Lead or Subsidiary Indicator', 'Other BSC Party Id' or 'Other BSC Party P/C Flag', and these should therefore be replaced with data items equivalent to the 'Lead Party Id', 'Lead Party P/C Flag', 'Subsidiary Party Id' and 'Subsidiary Party P/C Flag'.

The report provided to the Notification Agent from ECVAA should contain confirmation of only those notifications that the Notification Agent has submitted to ECVAA. However, under the circumstances where a notification submitted by a new ECVNA/MVRNA has been overwritten by a notification submitted by a 'successor' Notification Agent (i.e. ECVN ECVNAA Id / MVRN MVRNAA Id the same as that of a previous Notification Agent), these overwrite Notifications should be present in the report of the 'original' Notification Agent.

There are three options for the development of this interface, and an assessment of the implementation costs and timescales are required for each of the three options:

- Energy Contract Volume Notification Agent Forward Contract Report containing notified ECVNs only.
- Metered Volume Reallocation Notification Agent Forward Contract Report containing notified MVRNs only.
- Notification Agent Forward Contract Report containing both ECVNs and MVRNs.

#### **5.2.4 Provision of the Notification Agent Forward Contract Report**

The Notification Agent Forward Contract Report should be provided on the same schedule as the E0221 Forward Contract Report to BSC Parties.

#### **5.2.5 Requirement for Optionality of the Notification Agent Forward Contract Report**

Receipt of the Notification Agent Forward Contract Report should be optional. It is envisaged that this optionality will be controlled by the process defined in BSCP 41 'Report Requests and Authorisation', utilising the form BSCP 41/1 'Changes to Individual Reporting Requirements' whereby the Party Agent can 'switch off' (and switch on at a later date, if required) the interface if they have no requirement to receive it.

It should be noted that the functionality for 'switching' reports on and off is at the 'Party Agent' level, therefore unless the ECVNA and MVRNA roles have discrete identities, switching a report off (or on) for

one, will necessary mean that it is switched off (or on) for the other. One solution to this is the separate interface for MVRNs, where this can be switched on and off discretely if the Notification Agent does not require both interfaces.

It should be noted that no change to BSCP 41 is needed as a result of the inclusion of a new interface.

#### **5.2.6 Potential Changes to External Systems**

The introduction of a new interface from ECVAA to Notification Agents has an impact on Notification Agent systems and functionality. Therefore Notification Agents wishing to receive this report will have to build functionality into their systems to receive it.

However, due to the optionality of receipt of this interface, Notification Agents not wishing to receive this new interface can 'switch it off' by request under an existing manual process and therefore do not have to develop systems / functionality to receive such an interface. This effectively means that there is no impact on Notification Agents who do not require this interface.

#### **5.2.7 Potential Changes to Central Services**

The implementation of a new interface from ECVAA to Notification Agents will impact the systems and functionality of the ECVAA, as well as associated documentation (User Requirements Specification, System Specification, Interface Design Definition).

The implementation of the requisite optionality of the new interface may impact the Central Registration Agent (CRA).

#### **5.2.8 Potential Changes to Industry Documentation**

The following lists the documentation (other than the documentation specific to the Central Services and therefore 'owned' by the Central Services, such as the URSs) that requires amendment as a result of the introduction of the new reporting interface, with a brief summary of the potential change. The documentation listed is believed to represent the full set of impacted documents.

##### **5.2.8.1 *Balancing and Settlement Code***

Section V: Reporting - requires amendment to ANNEX V-1: TABLE 3 to add the new Notification Agent Forward Contract Report into the schedule of ECVAA reporting.

##### **5.2.8.2 *Balancing and Settlement Code Subsidiary Documents - The Reporting Catalogue***

The Reporting Catalogue requires amendment to reflect the new Notification Agent Forward Contract Report.

##### **5.2.8.3 *Service Description for Energy Contract Volume Aggregation***

Schedule 1 - BSC Operating Services, Part E - Service Description for Energy Contract Volume Aggregation requires amendment to Appendix A 'ECVAA Outputs' to reflect the new Notification Agent Forward Contract Report.

##### **5.2.8.4 *NETA Data File Catalogue***

The NETA Data File Catalogue requires amendment to include the new Notification Agent Forward Contract Report as an output from ECVAA.

### **5.3 Alternative Modification**

Not applicable, as the Requirements Specification for Modification proposal P017 017AAR (Reference 3) does not include specific reference to the Alternative Modification, but refers to it as an extension to scope of the original Modification.

## 6 IMPACT ON BSC AND BSCCO DOCUMENTATION

The impact detailed here is the same for the Modification and the Alternative Modification, therefore the detail of the impact is not defined separately for each of the Modification and Alternative Modification.

### 6.1 BSC

#### 6.1.1 Section V: Reporting

Section V ANNEX V-1 Table 3 requires amendment to include the new interface to Notification Agent(s).

The Legal Text to support this change is represented in ANNEX 1 of this Assessment Report.

### 6.2 Code Subsidiary Documents

#### 6.2.1 The Reporting Catalogue

The Reporting Catalogue requires amendment to reflect the new Notification Agent Forward Contract Report.

**Section 4 'Report from ECVA'** requires the addition of a new **section '4.6 Notification Agent Forward Contract Report'** detailing the information in the new interface.

#### 6.2.2 Service Description for Energy Contract Volume Aggregation

Schedule 1 - BSC Operating Services, Part E - Service Description for Energy Contract Volume Aggregation requires amendment to Appendix A 'ECVAA Outputs' to reflect the new Notification Agent Forward Contract Report.

**Appendix A ECVAA Outputs** requires the addition of a new entry at the end of the table as follows:

Output Flow Description	Flow Sent To
Notification Agent Forward Contract Report	Party Agent (Notification Agent)

#### 6.2.3 NETA Data File Catalogue

The NETA Data File Catalogue requires amendment to include the new Notification Agent Forward Contract Report as an output from ECVAA.

### 6.3 BSCCo Memorandum and Articles of Association

Not Applicable

## **7 IMPACT ON BSC SYSTEMS**

The detail of the impact assessment(s) from the Central Service Provider are provided in ANNEX 2 of this Assessment Report. Therefore this information provided here is a summary of such impact assessment. It should be noted that the NETA Central Service Agent provided only a High Level Impact Assessment (HLIA) for this Modification, as a result of constraints for such provision within NETA Central Service Agent. Therefore it should be noted that such impact assessment is indicative only.

It should be noted that, as a result of the structure of the Requirements Specification for Modification Proposal P017, 017AAR (Reference 3) for the original Modification, the impact assessment for the Alternative Modification was not provided separately. This is due the CNMG wishing to determine the implications of extending the scope of the original Modification Proposal P017, prior to creating the Alternative Modification.

### **7.1 Registration**

No Impact

### **7.2 Contract Notification**

No Impact

### **7.3 Credit Checking Systems**

No Impact

### **7.4 Balancing Mechanism Activities**

No Impact

### **7.5 Collection and Aggregation of Metered Data**

No Impact

### **7.6 Supplier Volume Allocation**

No Impact

### **7.7 Settlement**

No Impact

### **7.8 Clearing, Invoicing and Payment**

No Impact. The Funds Administration Agent (EPFAL) provided confirmation that there was no impact on their system functionality or processing from the implementation of the Modification and / or the Alternative Modification.

### **7.9 Reporting**

The following summarises the indicative High Level Impact Assessment provided (the full HLIA is provided in ANNEX 2 of this Assessment Report):

The HLIA indicates that the changes required to the Central Services system functionality and processing are in accordance with the P017 Requirements Specification (Reference 3).

The HLIA provides three cost and timescales options, as requested in the Requirements Specification and these can be summarised as follows:

- **Option 1:** ECVNA Reporting only (i.e. to ECVNAs only, containing only ECVNs)
 

Implementation Costs:	<b><u>£108,700 to £163,050</u></b>
Implementation Timeframe	<b><u>15 weeks</u></b>
Operational Cost (per month)	<b><u>£1,900 to £2,850</u></b>
- **Option 2:** MVRNA Reporting only (i.e. to MVRNAs only, containing only MVRNs)
 

Implementation Costs:	<b><u>£90,600 to £135,900</u></b>
Implementation Timeframe	<b><u>14 weeks</u></b>
Operational Cost (per month)	<b><u>£1,600 to £2,400</u></b>
- **Option 3:** ECVNA and MVRNA Reporting (i.e. to both ECVNAs and MVRNAs, containing both ECVNs and MVRNs)
 

Implementation Costs:	<b><u>£123,200 to £184,800</u></b>
Implementation Timeframe	<b><u>16 weeks</u></b>
Operational Cost (per month)	<b><u>£2,100 to £3,150</u></b>

These costs are exclusive of VAT, indicative only, and are valid for 30 days (however, it should be noted that this is under discussion with the NETA Central Service Agent, as it is recognised that the decision point for proceeding with the Modification will exceed the 30 days validity period).

The operational costs are under discussion with the NETA Central Service Agent outside of the Modifications procedure.

These costs and timescales also assume that the requisite ECVA performance enhancements have been undertaken as part of Modification P04, but no other interaction with Modification P04, specifically enhancements to the Forward Contract Report (E0221), has been taken into consideration.

These costs and timescales do not include any external market testing. For a change of this nature, there is a requirement for a degree of market testing and therefore this will impact such costs and timescales (Section 14 – Project Brief Executive Summary).

The CNMG considered these costs and timescales at their meeting of the 18<sup>th</sup> July 2001, and noted that the impact assessments were high level and therefore were indicative only. As a result of the relatively minor increase to costs and timescales required to include the extension to scope of the original Modification to provide a version of the Forwards Contract Report to the Metered Volume Reallocation Agent, as well as the Energy Contract Volume Notification Agent, the CNMG agreed that Option 3 be progressed as an Alternative Modification, in preference to the original Modification.

## **8 IMPACT ON CORE INDUSTRY DOCUMENTS AND SUPPORTING ARRANGEMENTS**

### **8.1 Grid Code**

No Impact from either the Modification or the Alternative Modification.

### **8.2 Master Connection and Use of System Agreement (MCUSA)**

No Impact from either the Modification or the Alternative Modification.

### **8.3 Supplemental Agreements**

No Impact from either the Modification or the Alternative Modification.

### **8.4 Ancillary Services Agreements (ASAs)**

No Impact from either the Modification or the Alternative Modification.

### **8.5 Master Registration Agreement (MRA)**

No Impact from either the Modification or the Alternative Modification.

### **8.6 Data Transfer Services Agreement (DTSA)**

No Impact from either the Modification or the Alternative Modification.

### **8.7 British Grid Systems Agreement (BGSA)**

No Impact from either the Modification or the Alternative Modification.

### **8.8 Use of Interconnector Agreement**

No Impact from either the Modification or the Alternative Modification.

### **8.9 Pooling and Settlement Agreement (PSA)**

No Impact from either the Modification or the Alternative Modification.

### **8.10 Settlement Agreement for Scotland (SAS)**

No Impact from either the Modification or the Alternative Modification.

### **8.11 Distribution Codes**

No Impact from either the Modification or the Alternative Modification.

### **8.12 Distribution Use of System Agreements (DUoSAs)**

No Impact from either the Modification or the Alternative Modification.

### **8.13 Distribution Connection Agreements**

No Impact from either the Modification or the Alternative Modification.

## **9 IMPACT ON ELEXON**

It is believed that neither the Modification nor the Alternative Modification has a direct impact on ELEXON other than the obligation to amend the Balancing and Settlement Code and Code Subsidiary documentation. However, both Modifications may have a beneficial impact in reducing costs by reducing the number and materiality of Trading Disputes and Trading Queries.

## **10 IMPACT ON PARTIES AND PARTY AGENTS**

The following represents an assessment of the impact on BSC Parties and Party Agents based upon the Consultation and Impact Assessment responses received. It should be noted that the Impact on Party Agents is relatively similar for both the Modification and the Alternative Modification, in that both require the implementation of a new report if the Party Agent chooses to receive such report.

### **10.1 Parties**

There will be no impact on BSC Parties, as the report will be an entirely new interface and there will be no change to the existing Forward Contract Report.

### **10.2 Party Agents**

There should be no impact on those Party Agents opting not to receive the new Notification Agent Forward Contract Report, as it will only be sent to those Party Agents which specifically request the new report.

There is potentially a material impact on Notification Agents who opt to receive such report, by the provision of functionality within systems and processes for receipt of the new report.

However, there was only one response during the Assessment Procedure that indicated that such impact will be minimal cost with associated implementation timescales of less than one week.

## **11 LEGAL ISSUES**

No Impact from either the Modification or the Alternative Modification.

## 12 SUMMARY OF REPRESENTATIONS

### 12.1 Initial Consultation Responses

The Initial Consultation request received nine responses. These responses are provided for information in ANNEX 5 of this Assessment Report. However, these responses can be summarised as follows (it should be noted that a number of responses were made on behalf of more than one BSC Party):

- Six Approvals
- Four conditional Approvals
- Three Rejections

One response was to reject the Modification on behalf of three BSC Parties. The grounds for the rejection was that the BSC Parties did not require the new interface, as they received it as BSC Parties and therefore they were not willing to incur the costs of implementing a change they did not need. This response also included a request that if the Modification were to be progressed, then the recipient Notification Agent should receive notification of only those trades they have notified to avoid data confidentiality issues.

Four responses provided conditional approvals. The conditions were as follows:

- The report should contain only those trades that the Notification Agent has notified
- There should be no possibility of confusing this new report with the existing Forward Contract Report
- The receipt of such report should be optional
- The costs of implementation should not be incurred by BSC Parties not wishing to receive such report.

The CNMG noted these responses and all have been addressed in the solution provided to this Modification.

### 12.2 Second Consultation and Impact Assessment Responses

The Second Consultation and Impact Assessment request resulted in the receipt of thirteen responses. These responses are provided in ANNEX 6 of this Assessment Report. These responses can be summarised as follows:

- One response indicated a rejection of the Modification in entirety;
- Two responses indicated 'No Comment';
- Ten responses provided agreement with the required changes, as drafted in the Requirements Specification (Reference 3) to support the Modification (without qualification); and
- Two responses indicated agreement, subject to costs and timescales, for the extension of scope to include Metered Volume Reallocations in the report, with the associated requirement to provide the report to the Metered Volume Reallocation Agent.

The CNMG discussed these responses at their meeting of the 18<sup>th</sup> July 2001 and noted one rejection. The rejection gave no accompanying reasons and the CNMG recognised that the proposed solution would not impact a BSC Parties / Party Agent not wishing to receive the report.

The CNMG noted that a number of responses agreed to the required changes, but did not indicate any preference for choice of implementation of either the Modification or the extended scope of the Alternative Modification. However, those responses which included reference to the scope extension, agreed that Alternative Modification be progressed subject to reasonable costs and timescales.

### **13 SUMMARY OF TRANSMISSION COMPANY ANALYSIS**

No representation was received from the Transmission Company, therefore a 'No Impact' response has been assumed.

## 14 PROJECT BRIEF – EXECUTIVE SUMMARY

The detailed costs and timescales provided here are based on the costs and timescales received from the NETA Central Service Agent and on those development and implementation costs and timescales projected by ELEXON

A Project Brief - 011AMB 'Modification Proposal P017 Project Brief' (Reference 4), has been prepared which sets out, in high level terms, a proposed project for implementation of the Alternative Modification changes required to support the following:

- The implementation of a new report 'Notification Agent Forward Contract Report' from ECVAA to Party Agents, with the associated flexible reporting capability; and
- The implementation of the amendments required to the Balancing and Settlement Code and Code Subsidiary documentation.

The cost of developing the necessary changes for the implementation of the new report within NETA Central Services is in the region of £185,000 and the requisite changes would be completed within 16 weeks. These costs and timescales do not include any allowance for external testing, nor do they include ELEXON project costs.

ELEXON will be responsible for managing implementation of the Alternative Modification. The CNMG have reviewed the implementation options and have strongly recommended that the Alternative Modification be implemented as part of the ELEXON BSC Systems Release 2 Project. This provides the most efficient and cost effective option for implementation of the Alternative Modification.

Therefore, in addition to the NETA Central Service Agent's development costs of £185,000 (indicative), there will be ELEXON project costs of a maximum of £80,000 which include those for changes to the Code and Code Subsidiary Documents as well as for the relevant degree of Market Participant testing. It should be noted that these ELEXON costs do not include any project management or audit costs.

Therefore, in summary:

- |   |                             |
|---|-----------------------------|
| • <b>NETA Central Service Agent Costs (indicative)</b>            | <b><u>£185,000</u></b>      |
| • <b>ELEXON Development and Implementation Costs (indicative)</b> | <b><u>£80,000</u></b>       |
| • <b>Planned implementation date</b>                              | <b><u>February 2002</u></b> |

## ANNEX 1 – PROPOSED TEXT TO MODIFY THE BSC

The amendments to the BSC are the same for the Modification and the Alternative Modification, therefore they are not referenced separately in this section.

**Section V: Reporting, ANNEX V-1** requires amendment as defined below:

**TABLE 3 – ECVAA Reporting**

Name of Report	Frequency	Recipient	General Description
Notification Report	End of Each Settlement Day	Relevant Party	For each Contract Trading Party, a summary relating to that Contract Trading Party of Energy Contract Volumes and Metered Volume Reallocations in respect of accepted notifications for the given Settlement Day and indebtedness data once these notifications are taken into account.
ECVAA Performance Report	Each month	BSCCo	A summary of ECVAA performance in respect of processing contract notification data received
Report of any rejections of ECVN	Promptly after a rejection	Relevant Party	A report relating to a Contract Trading Party of ECVNs rejected or refused or treated as rejected or refused
Report of any rejections of MVRN	Promptly after a rejection	Relevant Party	A report relating to a Contract Trading Party of MVRNs rejected or refused or treated as rejected or refused
Forward Notification Summary	Daily	Relevant Party	For each Contract Trading Party, a summary relating to that Contract Trading Party of notifications received, for a given number of Settlement Days following the Settlement Day on which the report is provided.
<b><u>Notification Forward Notification Summary</u></b>	<b><u>Daily</u></b>	<b><u>Relevant Party Agent</u></b>	<b><u>For each Notification Agent, a summary relating to that Notification Agent of notifications submitted and accepted, for a given number of Settlement Days following the Settlement Day on which the report is provided.</u></b>

## ANNEX 2 – BSC AGENT IMPACT ASSESSMENTS

Included below are the impact assessments received from the following BSC Agents:

1. BMRA, CDCA, CRA, ECVAA, SAA and TAA Services impact assessment (NETA Central Service Agent)
2. FAA Service impact assessment (EPFAL)

### 1. Impact Assessment from BMRA, CRA, CDCA, ECVAA, SAA and TAA

#### NETA Change Form

To be completed by the Originator						
Change Request ID (to be provided by the Customer) P17 Logica reference: ICR117			Service affected BMRA/SAA/TAA/CRA/CDCA/ECVAA			
Change Request Name:			ECVNAs to Receive 7-Day Report			
Agreement by the customer to proceed to the next stage						
	High Level Assessment	Detailed Level Assessment	Change Quotation	Implement Change	Emergency Fix Report	Change Request under Clause 14.2 (delay)
Tick which stage is being requested	✓					
Signed by Customer Baseline Manager						
Signed by Customer Contract Manager						
Date of agreement to proceed to next stage					n/a	n/a
Date this stage to be completed by	13/07/01					
Configuration of Service(s) (baseline affected)						
Assumed Changes (over baseline)						
Priority	High/Medium/Low					
Identified by : Sandy Blows			Date Submitted: 29/06/01			
Description of Change See attached original P17						
Reason for Change (benefits) See attached original P17						
Implications of not making the change See attached original P17						
Attachments/references			P17			
Competition Item Yes/No/n/a	Reasons for Competition					

If Change Request made under Clause 14.2 (delay)	Required supporting information attached			
<b>To be completed by the Service Provider</b>				
	High Level Assessment	Detailed Level Assessment	Change Quotation	
Tick which stage is being completed	✓			
Signed by Service Provider Contract Manager				
Date	13/07/01			
Validity period of costs/prices	Change Quotation			
	Change		30 days	
Does the change involve any changes to the System or Services			Yes	
Would the undertaking of a Detailed Level Assessment or Change Quotation delay the Trigger Milestone or the Planned Go-Live Date before Go Live or any Release Date after Go Live			N/a	
If Yes – specify which Milestones/Release Dates would be affected	N/a			
Impact on any Milestones of incorporation of change	N/a			
Indicative impact on resources for change incorporation	Phase of the work			
	Design	Build	Test & Trial	Operate
	Labour			
Materials/3rd Party				
Impact on Service Levels	None			
Impact on IDD	Yes			
Price for Detailed Level Assessment				Indicative/firm
Price for Change Quotation				Indicative/firm
Price for Change	<p>Solution 1 ECVN Only Between £108,700 and £163,050 (ex VAT) – to implement this change. Between £1,900 and £2,850 (ex VAT) per month to Operate and Maintain</p> <p>Solution 2 MVRN Only Between £90,600 and £135,900 (ex VAT) – to implement this change. Between £1,600 and £2,400 (ex VAT) per month to Operate and Maintain</p> <p>Solution 3 ECVN and MVRN Between £123,200 and £184,800 (ex VAT) – to implement this change. Between £2,100 and £3,150 (ex VAT) per month to Operate and Maintain</p>			<p>Indicative</p> <p>Indicative</p> <p>Indicative</p> <p>Indicative</p> <p>Indicative</p>

Assumptions for the above Price:	
<ul style="list-style-type: none"> <li>No account has been taken of the interaction with the additional forward contract report functionality that is part of P4.</li> <li>Performance implications will impose additional load on servers and other equipment. No allowance has been made for any performance implications, as this should be part of a performance study, as proposed for P4.</li> <li>Logica will invoice 30% on receipt of CN or authorised start of work, 50% on completion of acceptance tests, 20% on deployment or one month after completion of testing, whichever is sooner.</li> <li>Price does not include provision for indexation of daily fee rates with effect from 1<sup>st</sup> April 2002. It is assumed all work within this quote will be completed by that date in accordance with the attached plan.</li> <li>The Service Description will have been updated by ELEXON and agreed with Logica prior to deployment.</li> <li>Only document updates will be submitted for review by ELEXON during the development of this change and a maximum of one working day has been allowed for ELEXON to review and comment on the updates. No allowance is included for addressing comments from ELEXON and only one iteration of all reviewed documents has been included in this price.</li> <li>Within reasonable levels, Elexon will make available appropriate staff to assist Logica during the development of this change</li> <li>As requested no allowance has been made for Elexon to witness testing.</li> <li>Regression testing will only be performed on our own system, with external interfaces being simulated as necessary. No allowance has been made for testing with external systems.</li> <li>The cost and durations provided in this HLIA assume that only the CP to which the estimate relates is being implemented. No account has been taken of any possible effects of implementing other changes.</li> <li>This HLIA assumes that there will be no new Service Levels.</li> <li>It is anticipated that if ELEXON require a DLIA, this will be carried out for a set of changes, and at that stage the timescale impact of implementing several changes can be included in the assessment.</li> </ul>	

If the change is to be incorporated after Go Live, is this change proposed to be a patch or release	patch
If patch, expected time of incorporation	<p>The estimated time to complete the development of the different options are:</p> <ul style="list-style-type: none"> <li>15 weeks for Solution 1 (ECVN Only)</li> <li>14 weeks for Solution 2 (MVRN Only)</li> <li>16 weeks for Solution 3 (ECVN and MVRN)</li> </ul>

If release - what release number		Release number	
Date		Release Date	
For High Level Assessment only – is it a Detailed Level Assessment Yes/No		If No, estimate of time and resources required to complete	
Resources Required to undertake		Detailed Level Assessment	Change Quotation
Labour			
Materials			
Consequential amendments to base line:			
Proposed method of Change/ Work statement		Update IMServ LWI's and retrain staff in revised procedures.	
Proposed Plan for Change			
Has the customer has indicated this is a competitive change			No
Service Provider Plan for competition			
Risks/Constraints of competition			
Service Provider plan for incorporation of change including testing			
Documentation to be produced by Service Provider to enable competition according to plan above			
Indicative costs of Service Provider role in competition			
<b>For Change Notice only – to be completed by the Customer</b>			
<b>Basis for payment</b>			
<b>Agreed Customer Caused Delay: Yes/No</b>			
<b>If Yes, amount of delay</b>			
<b>Date Change to become effective.</b>		<b>Is this to be a Release Date? Yes/No</b>	
<b>Other items as required under the Change Management Procedures</b>			

## 2. Impact Assessment from FAA (EPFAL)

### CPC025: Detailed Level Impact Assessment (DLIA) for Modification Proposal P17: ECVNAs To Receive 7 Day Report.

I agree/disagree\* with the proposed changes.

How much notification do you require? \_\_\_\_\_ No. Of days.

Do the changes stated impact your organisation? **No**

Comments:

Name: \_\_\_\_\_ SARAH HOOLEY \_\_\_\_\_

BCA/PACA\* \_\_\_\_\_ BCA \_\_\_\_\_

Organisation: \_\_\_\_\_ LOGICA EPFAL \_\_\_\_\_

Date: \_\_\_\_\_ 13/07/01 \_\_\_\_\_

### **ANNEX 3 – CORE INDUSTRY DOCUMENT IMPACT ASSESSMENTS**

No Impact Assessments have been received which indicate that there is an impact on Core Industry Documentation.

## **ANNEX 4 – TRANSMISSION COMPANY ANALYSIS**

No representations were received from the Transmission Company, therefore a 'No Impact' response is assumed.

## **ANNEX 5 – INITIAL CONSULTATION RESPONSES**

### **Responses from P17 Assessment Consultation**

Representations were received from the following parties:

<b>No</b>	<b>Company</b>	<b>File Number</b>
1.	Scottish & Southern	P17_ASS_001
2.	Dynegy	P17_ASS_002
3.	Seeboard	P17_ASS_003
4.	Powergen	P17_ASS_004
5.	TXU Europe	P17_ASS_005
6.	London Electricity	P17_ASS_006
7.	Northern Electric	P17_ASS_007
8.	ScottishPower	P17_ASS_008

**P17\_ASS\_001 - Scottish & Southern**

Modification Proposal 17 - ECVNAs to Receive 7 Day Report

Response provided on behalf of Scottish and Southern Energy, Southern Electric, Keadby Generation Limited and SSE Energy Supply Limited.

Background

This modification suggests ECVNAs should receive an appropriate version of the 7 Day Report confirming notified volumes received by the ECVAAs to allow them to manage their own errors and increase confidence in the notification process.

Conclusions

SSE supports the principle behind this modification. It seems sensible that ECVNAs should have access to such a report. We agree that this would help improve confidence and reduce the number of errors generally. However we believe it is a little ambitious to believe that this modification proposal would in itself improve short term trading and market liquidity.

We agree the proposal should proceed to the Assessment Procedure and recommend further consideration should be given to the impact on systems, processes, timescales and costs.

Beverley Grubb

Market Development

Scottish and Southern Energy plc

**P17\_ASS\_002 - Dynegy**

Mr G Forrester  
Elexon  
Third Floor  
1 Triton Square  
London  
NW1 3DX

14 June 2001

Dear Gareth,

Modification Proposal P017: ECVNAs to receive 7 day report.

Dynegy is sympathetic towards third party agents who currently do not receive the 7 day report. Energy Contract Volume Notification Agents (ECVNAs) are exposed to risks as a consequence of not being able to track the notifications that they have submitted and this risk is exacerbated by the poor Energy Contract Volume Authorisation Agent (ECVAA) service. However, Dynegy only supports the proposal on the condition that the ECVNA would only receive a report containing the details of those trades that it has notified. Under no circumstances must any ECVNA be allowed to receive the net position of all parties that the ECVNA notified on the behalf of. This would be a significant breach of commercial confidentiality and would ultimately result in parties being unwilling to use third party ECVNA.

Yours sincerely,

Rekha Patel.

Power Regulatory Analyst.

**P17\_ASS\_003 – Seeboard**

From: Morton, David[SMTP:DMorton@seeboard.com]  
Sent: 15 June 2001 11:07  
To: 'Elexon Modifications'  
Subject: P17 Assessment Comments

With respect to the above mentioned modifications proposal we have the following comments.

In our view this modification, if accepted, would make it possible for some ECVNAs to provide their customers with a more reliable service. This would be of benefit to the entire market. It is an oversight that ECVNAs were not made recipients of this report at market opening.

There is another modification that touches on this area. It looks likely that the first deliverable from P4 Modification group will be improved reporting of the notification process. P17 specifically requests new versions of "7 Day report", however a better solution may well emerge from P4 proposals. The needs of Power Exchanges and similar ECVNAs should be embraced by P4 group and their proposals amended appropriately. A single package of changes should then emerge.

We would discard an ECVNA "7 Day Report" since we do not offer a third party ECVNA service. As such its contents would be a subset of the existing report we receive as a Supplier. Notwithstanding our own need we do understand and support improvement of reporting for ECVNAs.

Dave Morton  
SEEBOARD  
0190 328 3465

**P17\_ASS\_004 - Powergen**

14th June 2001

Dear Gareth

Proposed Variation to BSC - Modification Proposal No: P17

Powergen welcomes this opportunity to make initial comments on the modification proposed.

Powergen supports the provision to ECVNAs of the information about the notifications that they have made for the next seven days, but would like make the following points in relation to this proposal:-

\* There must be no possibility of BSC Parties confusing the new flow with the existing E0221 file. There have already been instances of counterparties disputing schedule 3b notifications at 19:00 on the basis of the 12:00 or 15:00 edition of their ECVAA 7 day report. A report that doesn't show a BSC Party the notifications made by its counterparties has the potential to cause more erroneous disputes.

\* The report must be a separate flow and not cause any changes to be made to the E0221 flow. It will not be possible to treat the report recipient as the selling party and both parties will need to be identified.

\* The ECVAA URS will need to be amended as at present ECVNAs are excluded from receiving the E0221 flow.

Yours Sincerely  
James Hawkins.

Strategy & Regulation  
Energy Trading  
Powergen.

3

**P17\_ASS\_005 – TXU Europe**

From: nikki.lea@txu-europe.com[SMTP:nikki.lea@txu-europe.com]  
Sent: 15 June 2001 16:18  
To: modifications@elexon.co.uk  
Cc: phil.russell@txu-europe.com  
Subject: Initial Comments on P17

TXU Europe Energy Trading Ltd (on behalf of all TXU Europe companies) would like to make the following comments on Modification proposal P17 - ECVNAs to Receive 7-Day Report.

TXU agree that ECVNAs should receive the 7-Day Report as it applies to notifications they have made. However this must be an optional service as trading parties who act as their own ECVNA may not wish to receive the 7-Day Report twice.

Regards

Nikki Lea  
Market Development Analyst

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~~~~~

**P17\_ASS\_006 – London Electricity**

From: Walker Rachel[SMTP:Rachel\_Walker@londonelec.co.uk]  
Sent: 15 June 2001 15:40  
To: 'modifications@elexon.co.uk'  
Subject: P17 Assessment Comments

Please find London Electricity's comments on modification P17 below

London Electricity generally supports this modification to allow third party ECVNAs to receive the Forward Contract or 7-day Report. This will affect a small number in the market as most ECVNAs are also Trading Parties. However, it will allow those who are not also trading parties to better assess their notifications. This will facilitate increased efficiency in the market, thus better fulfilling the BSC objective under Condition 7A(3)(c) of the transmission licence.

One reservation about the modification is that not all of those receiving this report will have contributed to its cost. We would therefore like to see an appropriate charge to be levied on those receiving the report who are not BSC signatories. Also we are concerned that ECVNAs that are also Trading Parties may receive two copies of the report. This may cause system difficulties and so it may be optimal that ECVNAs already receiving this information do not receive a duplicate. We suggest that ECVNAs should be able to choose whether to receive this report in addition to their existing report. This will ensure that parties' existing systems are not disrupted by a duplicate report.

Regards

Rachel Walker

**P17\_ASS\_007 - Northern Electric**

.15th June 2001

Modification Department  
ELEXON  
10th Floor  
338 Euston Road  
London  
NW1 3BP

Dear Sir

Modification Proposal P17: ECVNAs to receive 7 Day Report.

Northern Electric and Gas welcomes the opportunity to comment on modifications P17 'ECVNAs to receive 7 Day Report'.

Having considered the options outlined in the 'Initial Assessment of Modification Proposal P17', Northern Electric supports Modification Proposal P17. We believe that the proposal of this modification are justified, as all 3rd party ECVNA's should receive these confirmations to allow them to manage their own errors and omissions risk

Within the industry all participants should be given equal opportunity to manage their own risks, and this modification will enable this, as it will lead to more short term liquidity and less exposure to the balancing mechanism for 3rd party ECVNA's.

We hope that these comments are helpful,

Yours faithfully

Lesley Mulley  
Industry Communications Manager  
Northern Electric and Gas

Northern Electric

C:\windows\TEMP\TW015 - P17 Assessment Comments.doc

**P17\_ASS\_008 - ScottishPower**

Cathcart Business Park, Spean Street  
Cathcart, Glasgow, G44 4BE  
Telephone (0141) 568 2313  
FAX (0141) 568 2366  
15th June 2001

Mr Gareth Forrester  
Modifications Manager

P17 Assessment Comments from ScottishPower

Dear Mr Forrester,

ScottishPower is pleased to provide our comments on Modification Proposal P17: ECVNAs to Receive 7-Day Report. Please note that these comments are provided on behalf of ScottishPower plc, Manweb plc and Manweb Services Ltd. Please also be aware that ScottishPower has not undertaken a full review of this proposal at this stage, and that the points raised below may be superseded by subsequent analysis as the proposal progresses to Report Phase.

ScottishPower receives the 7-Day Report as a Trading Party and does not (and has no intention to) contract with any third party Notification Agents. Consequently, we do not need to receive the report as a Notification Agent and we would not support Modification Proposal P17 as it would incur unnecessary additional costs to develop systems to generate and receive the report as well as on-going operational costs. If the proposal is nevertheless progressed we assume that Notification Agents will only receive information in the report for trades they had responsibility for notifying.

I hope you find these comments helpful, and that they can be considered by the Modification Group during the further assessment of P17. If you have any questions on this response, please do not hesitate to contact me.

Yours sincerely,

Steve Field

ScottishPower Cathcart Business Park Spean Street Glasgow G44 4BE  
Telephone 0141 568 2000

## ANNEX 6 – SECOND CONSULTATION AND IMPACT ASSESSMENT RESPONSES

### Responses from P17 Assessment Second Consultation and Impact Assessment

Representations were received from the following parties:

No	Company	File Number	For	Against
1.	Seeboard	P17_IA_001	✓	
2.	Scottish and Southern	P17_IA_002	✓	
3.	London Electricity	P17_IA_003	✓	
4.	Yorkshire Electricity	P17_IA_004	✓	
5.	Npower and Npower Direct Ltd (NDL)	P17_IA_005	✓	
6.	GPU Power Distribution	P17_IA_006	-	-
7.	ScottishPower	P17_IA_007		✓
8.	TXU Europe	P17_IA_008	✓	
9.	Siemens Metering DataCare	P17_IA_009	-	-
10.	Siemens	P17_IA_010	✓	
11.	AEP Energy Services Limited	P17_IA_011	✓	
12.	British Energy plc	P17_IA_012	✓	
13.	Bridge of Cally Energy	P17_IA_013	✓	

**P17\_IA\_001 Seeboard**

**From:** Fraser, Sue[SMTP:SFraser@seeboard.com]  
**Sent:** 13 July 2001 12:50  
**To:** 'modifications@elexon.co.uk'  
**Subject:** P17 Consultation/Assessment - SEEBOARD Response

Our response to the Modification Proposal 17 is as follows:-

Seeboard fully supports Modification P17. As a Notification Agent and Electricity Supplier we have no need for this report since it would only contain a subset of the data we already receive in flow ECVAA-I022. We do however understand how other ECVNA's, offering a third party service, would find this very helpful and this would better facilitate achievement of BSC Objectives.

Seeboard welcomes the approach which makes the receipt of the proposed new flow fully optional since this removes the need for any immediate work on our trading systems or infrastructure. We would update our message routing software at some point so that it understands the structure and default routing for the proposed flow should one be sent to us in error. We would require no notice of the change.

Seeboard supports the option to extend the scope of the modification to MVRNA's, however this support is conditional on the costs being reasonable.

Sue Fraser  
for Dave Morton 0190 328 3465

[CPC025: Detailed Level Impact Assessment \(DLIA\) for Modification Proposal P17: ECVNAs To Receive 7 Day Report.](#)

I agree with the proposed changes.

How much notification do you require?  0 No. Of days.

Do the changes stated impact your organisation? No\*

**Comments:**

No impact on Seeboard as this new flow will be fully optional.

Seeboard supports the option to extend the scope of the modification to MVRNA's, however this support is conditional on the costs being reasonable.

Name: Dave Morton  
BCA/PACA\*  
Organisation: SEEBOARD  
Date: 13<sup>TH</sup> July 2001

**P17\_IA\_002 Scottish and Southern**

**From:** Beverley Grubb[SMTP:Beverley.Grubb@scottish-southern.co.uk]  
**Sent:** 13 July 2001 13:33  
**To:** modifications@elexon.co.uk  
**Subject:** P17 Consultation / Assessment

Please find attached our response in relation to the above modification proposal.

Regards

Beverley Grubb  
Market Development  
Scottish and Southern Energy

Attached file: p17.doc:

**P017 - Requirements Specification for Receipt by Notification Agent  
Of Forward Contract Report**

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

**Background**

This modification suggests ECVNAs should receive an appropriate version of the 7 Day Report confirming notified volumes received by the ECVAAs to allow ECVNA's to manage their own errors. This would help increase confidence in the notification process.

SSE supports the principle behind this modification. It seems sensible that ECVNAs should have access to such reports. We agree that it should improve confidence and help reduce the number of notification errors. It would also place ECVNA's on a level footing with BSC Parties.

SSE agrees that P017 should be progressed as a standalone Modification Proposal but P004 should be taken into consideration where relevant.

**Comments on Requirements Specification Overview**

We believe that:

- to protect confidentiality any report should only contain those trades that the Notification Agent has notified
- receipt of the report should be optional
- it is appropriate that the report is based on the format of E0221 but there should be no change to E0221.
- if a notification is overwritten by another agent, this information should be shown in the new report in order that the agent has the most accurate and up to date information to allow him to identify all errors or inconsistencies associated with those trades that he has notified.
- the report should contain information on ECVNs and MVRNs.

**Implementation Costs and Time scales**

SSE anticipate they could implement this change within a timescale of less than 1 week and the costs would be minimal.

We look forward to receiving feedback from the Logical Consortium on the likely cost and timescales for implementing such changes. Any final decision should be made in light of such information.

**P17\_IA\_003 London Electricity**

**From:** Walker Rachel[SMTP:Rachel\_Walker@londonelec.co.uk]  
**Sent:** 13 July 2001 15:19  
**To:** 'Modifications@elexon.co.uk'  
**Subject:** P17 Consultation/Assessment

Please find below London Electricity's response to the above modification.

Regards

Rachel Walker

London Electricity supports this modification to allow third party ECVNAs to receive the 7 day report subject to the clarification of cost allocation.

Any ECVNA that receives the report should contribute towards the cost of its production. We would hope to see cost information in the next stage of the modification process.

We are pleased that receipt of the ECVNA report is optional as this will prevent duplication to BSC parties who already receive the 7 day report. It is also correct that the ECVNA report only contains details of those trades which it has notified to ensure confidentiality.

**P17\_IA\_004 Yorkshire Electricity**

From: Emma.Coates@yeg.co.uk

Sent: 13 July 2001 11:26

To: ccc@elexon.co.uk

Subject: CPC025 - DLIA on P17: ECVNAs to Receive 7-Day Report

Dear CCC,

Yorkshire Electricity agree to the above change proposal.

If you have any queries, please let me know.

Cheers,

Emma Coates

Business Analyst, Supply Design Authority

Information Systems Services

Yorkshire Electricity

[www.yeg.co.uk](http://www.yeg.co.uk)

**P17\_IA\_005 Npower and Npower Direct Ltd (NDL)**

**From:** Lees, Helen

**Sent:** 13 July 2001 11:31

**To:** 'ccc@elexon.co.uk'

**Subject:** Elexon CPC25

All

Please find attached below Npower and Npower Direct Ltd's response to Elexon CPC25.

If you have any questions about this CPC response please do not hesitate to contact me.

Regards

Helen Lees

Design Authority

npower

<<NDL response CPC025.doc>>

[CPC025: Detailed Level Impact Assessment \(DLIA\) for Modification Proposal P17: ECVNAs To Receive 7 Day Report.](#)

I agree/~~disagree~~\* with the proposed changes.

How much notification do you require? \_\_\_\_\_ No. Of days.

Do the changes stated impact your organisation? ~~Yes~~/No\*.

Comments:

Name: Helen Lees

BCA/PACA\* \_\_\_\_\_

Organisation: Npower Direct Ltd

Date: 13 July 2001

<<Npower response CPC025.doc>

CPC025: Detailed Level Impact Assessment (DLIA) for Modification Proposal P17: ECVNAs To Receive 7 Day Report.

I agree/~~disagree~~\* with the proposed changes.

How much notification do you require? \_\_\_\_\_ No. Of days.

Do the changes stated impact your organisation? ~~Yes~~/No\*.

Comments:

Name: Helen Lees

BCA/~~PACA~~\* \_\_\_\_\_

Organisation: Npower

Date: 13 July 2001

**P17\_IA\_006 GPU Power Distribution**

From: Deregulation Control Group

Sent: 13 July 2001 16:03

To: 'Sahra Abdillahi'

Subject: GPU Power UK's Response to CPC025 - DLIA on P17: ECVNAs to Receive 7-Day Report

Sahra,

Please find that GPU Power UK's response to CPC025 - DLIA on P17: ECVNAs to Receive 7-Day Report, is 'No Comment.'

Regards,

Jason

Jason J Guest

Deregulation Control Group & Distribution Support Office

GPU Power Distribution

**P17\_IA\_007 ScottishPower**

From: NETA\_SPOC  
Sent: 13 July 2001 16:39  
To: 'ccc@elexon.co.uk'  
Subject: ScottishPower Response to CPCs 24 and 25

Please find attached ScottishPower's comments on Change Proposal Circulars 24 and 25. If you have any problems with this email or its attachments, please do not hesitate to contact me.

Steve Field

Calanais for ScottishPower

Design Authority, Deregulated Services

CPC025: Detailed Level Impact Assessment (DLIA) for Modification Proposal P17: ECVNAs To Receive 7 Day Report.

I ~~agree~~/disagree\* with the proposed changes.

How much notification do you require? \_\_\_\_30\_\_\_\_ No. Of days.

Do the changes stated impact your organisation? Yes/~~No~~\*.

Comments:

Name: \_\_\_\_\_David Nawrath\_\_\_\_\_

BCA/PACA\* \_\_\_\_\_

Organisation: \_\_\_\_ScottishPower / Manweb\_\_\_\_\_

Date: \_\_\_\_13th July 2001\_\_\_\_\_

**P17\_IA\_008 TXU Europe**

From: edward.coleman@txu-europe.com

Sent: 13 July 2001 16:18

To: ccc@elexon.co.uk

Subject: CPCs

(See attached file: P17 CPC025r.doc)(See attached file: CPC024r.doc)

CPC025: Detailed Level Impact Assessment (DLIA) for Modification Proposal P17: ECVNAs To Receive 7 Day Report.

I agree with the proposed changes.

How much notification do you require? \_\_30\_\_\_\_\_ No. Of days.

Do the changes stated impact your organisation? Yes.

**Comments:**

The number of days notice is dependant upon the final solution chosen: Option 1, Option 1 and Option 2 combined or Option 3. Option 3 attracts the least impact.

Name: \_\_\_\_Edward Coleman\_\_\_\_\_

BCA/PACA\* \_\_\_\_BCA\_\_\_\_\_

Organisation: \_\_\_\_TXU\_\_\_\_\_

Date: \_\_\_\_13/07/2001\_\_\_\_\_

**P17\_IA\_009 Siemens Metering DataCare**

From: Riley, Victoria  
Sent: 02 July 2001 15:30  
To: 'Sahra Abdillahi'  
Cc: Handley, Sarah  
Subject: RE: CPC025 - DLIA on P17: ECVNAs to Receive 7-Day Report

Sahra,

Please find attached Siemens Metering DataCare response to CPC025.

Kind Regards

Vicki

[CPC025: Detailed Level Impact Assessment \(DLIA\) for Modification Proposal P17: ECVNAs To Receive 7 Day Report.](#)

I neither agree nor disagree with the proposed changes.

How much notification do you require? \_\_\_\_0\_\_\_\_ No. Of days.

Do the changes stated impact your organisation? No.

Comments:

Name: \_\_\_Victoria Riley\_\_\_\_\_

BCA/PACA\* \_PACA\_\_\_\_\_

Organisation: \_\_\_On behalf of Siemens Metering DataCare\_\_\_\_\_

Date: \_\_\_2 July 2001\_\_\_\_\_

**P17\_IA\_010 Siemens**

From: roger.grew@siemens.co.uk  
Sent: 02 July 2001 16:52  
To: Sahra Abdillahi  
Subject: Re: CPC025 - DLIA on P17: ECVNAs to Receive 7-Day Report

No impact.

(See attached file: CPC025.doc)

CPC025: Detailed Level Impact Assessment (DLIA) for Modification Proposal P17: ECVNAs To Receive 7 Day Report.

I agree with the proposed changes.

How much notification do you require? None.

Do the changes stated impact your organisation? No

Comments:

Name: Roger Grew

BCA/PACA\*

Organisation: Siemens Metering (Nottingham)

Date: 2nd July 2001.

**P17\_IA\_011 AEP Energy Services Limited**

From: rcossec@aep.com  
Sent: 05 July 2001 15:01  
To: ccc@elexon.co.uk  
Subject: CPC025

Please find herewith AEP change Management Circular.  
(See attached file: Impact assessment P17 CPC025.doc)

CPC025: Detailed Level Impact Assessment (DLIA) for Modification Proposal P17: ECVNAs To Receive 7 Day Report.

I agree with the proposed changes.  
How much notification do you require? 5 working days.  
Do the changes stated impact your organisation? No.

Comments:

Name: \_\_\_\_\_Rozenn Cossec\_\_\_\_\_

BCA/PACA\* \_\_\_\_\_

Organisation: \_\_\_AEP Energy Services Ltd\_\_\_\_\_

Date: \_\_\_\_\_05/07/01\_\_\_\_\_

**P17\_IA\_012 British Energy plc**

From: Ace Rachel  
Sent: 12 July 2001 10:57  
To: 'ccc@elexon.co.uk'  
Subject: CPC025

Please find attached the modified proforma for the above CPC.

Regards

Rachel Ace

This message has been sent from the British Energy Group.

British Energy plc

[CPC025: Detailed Level Impact Assessment \(DLIA\) for Modification Proposal P17: ECVNAs To Receive 7 Day Report.](#)

I agree with the proposed changes.

How much notification do you require? \_\_\_None\_\_\_\_\_ No. Of days.

Do the changes stated impact your organisation? Yes/No\*.

Comments:

Name: \_Rachel Ace\_\_\_\_\_

BCA/PACA\* \_BCA\_\_\_\_\_

Organisation: British Energy Power and Energy Trading, British Energy Generation, Eggborough Power Ltd\_\_\_\_\_

Date: 12<sup>th</sup> July 2001\_\_\_\_\_

**P17\_IA\_013 Bridge of Cally Energy**

Written response from Stephen Mooney:

Agree. No Impact