

Responses from P218 Report Phase Consultation

Consultation Issued on 18 March 2008

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	SAIC on behalf of ScottishPower	P218_dMR_01	6	0
2.	CE Electric UK	P218_dMR_02		
3.	Scottish and Southern Energy (as a whole)	P218_dMR_03	6	1
4.	Good Energy Ltd	P218_dMR_04	1	0
5.	Western Power Distribution	P218_dMR_05	2	0
6.	Siemens Energy Services	P218_dMR_06	0	6
7.	TMA	P218_dMR_07	0	4
8.	British Energy	P218_dMR_08	5	0
9.	Electricity North West Ltd	P218_dMR_09	1	0
10.	RWE Npower	P218_dMR_10	10	0

P218 Report Phase Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	Bryan Donnelly
Company Name:	SAIC on behalf of ScottishPower
No. of BSC Parties Represented	6
Parties Represented	Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant). ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd
No. of Non BSC Parties Represented (e.g. Agents)	0
Non Parties represented	Please list all non Parties responding on behalf of (including the respondent company if relevant).
Role of Respondent	(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributors / other – please state) Supplier / BSC Agent / Party Agent / Distributors
Does this response contain confidential information?	No

Q	Question	Response	Rationale
1	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P218	Yes	Yes, ScottishPower supports the Panel's recommendation for the following reasons: <ul style="list-style-type: none"> BSC Objective c would not be achieved as the BSC is not the main

P218 Draft Modification Report Form

Q	Question	Response	Rationale
	<p>should not be made?</p> <p>Please give rationale.</p>		<p>obstacle to greater take up of micro generation and no case has yet been made to suggest otherwise. The modification is also costly and brings little benefit</p> <ul style="list-style-type: none"> BSC Objective d would not be achieved as the modification will ultimately introduce error into Settlement despite the best endeavours of industry to minimise these. We should not be supporting changes to the BSC which will result in further error in the Settlement process. The modification would not produce better facilitation than currently exists within the BSC.
2	<p>Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 should not be made?</p> <p>Please give rationale.</p>	Yes	<p>Yes, ScottishPower supports the Panel's recommendation for the same reasons as given in Q1.</p>
3	<p>Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 is better than the Proposed Modification?</p> <p>Please give rationale.</p>	Yes	<p>Yes, ScottishPower supports the Panel's recommendation.</p> <ul style="list-style-type: none"> The alternative modification would be preferable to the proposed modification due to its increased simplicity and avoidance of impacting NHHDA systems. However we feel we should re-affirm our belief that at its core it is still flawed and not an appropriate way forward for the Settlement of microgeneration.
4	<p>Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P218?</p> <p>Please give rationale.</p>	Yes	<p>Yes, ScottishPower supports the Panel's recommendation.</p> <ul style="list-style-type: none"> The implementation approach seems to be a sensible way forward. We would agree with the timelines described and the acceptance that the implementation should be contained within a standard industry release

P218 Draft Modification Report Form

Q	Question	Response	Rationale
5	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes	Yes, ScottishPower supports the Panel's view. <ul style="list-style-type: none">The legal text as drafted delivers the solution agreed by the Modification Group
6	Are there any further comments on P218 that you wish to make?	No	

Please send your responses by **12:00 (noon)** on **Wednesday 2 April 2008** to modification.consultations@elexon.co.uk and please entitle your email '**P218 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the BSC Panel.

Any queries on the content of the consultation pro-forma should be addressed to Ysanne Hills on 0207 380 4162, email address ysanne.hills@elexon.co.uk.



P218 Report Phase Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	Name EMMA WARD
Company Name:	CE Electric UK
No. of BSC Parties Represented	
Parties Represented	Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	
Role of Respondent	LDSO
Does this response contain confidential information?	NO

Q	Question	Response	Rationale
1	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P218 should not be made? Please give rationale.	Yes	
2	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 should not be made? Please give rationale.	Yes	

P218 Draft Modification Report Form

Q	Question	Response	Rationale
3	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 is better than the Proposed Modification? Please give rationale.	Yes	
4	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P218? Please give rationale.	Yes	
5	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes	
6	Are there any further comments on P218 that you wish to make?	No	

Please send your responses by **12:00 (noon)** on **Wednesday 2 April 2008** to modification.consultations@elexon.co.uk and please entitle your email '**P218 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the BSC Panel.

Any queries on the content of the consultation pro-forma should be addressed to Ysanne Hills on 0207 380 4162, email address ysanne.hills@elexon.co.uk.



218 Report Phase Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	Martyn Edwards on behalf of Scottish and Southern Energy PLC
Company Name:	Scottish and Southern Energy (as a whole)
No. of BSC Parties Represented	As registered
Parties Represented	As registered
No. of Non BSC Parties Represented (e.g. Agents)	As registered
Non Parties represented	As registered
Role of Respondent	Supplier/Generator/ Trader / Party Agent / Distributors
Does this response contain confidential information?	No

Q	Question	Response	Rationale
1	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P218 should not be made? Please give rationale.	Yes	We support the Panel's provisional recommendation, since we believe P218 is not the most appropriate mechanism to facilitate the applicable BSC objectives. We do, however, support the principles and purpose of microgeneration.
2	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 should not be made? Please give rationale.	Yes	We support the Panel's provisional recommendation since we feel the alternative modification P218 is preferable to the proposed, but is not an improvement on the current baseline.

P218 Draft Modification Report Form

Q	Question	Response	Rationale
3	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 is better than the Proposed Modification? Please give rationale.	Yes	See answer (2) above.
4	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P218? Please give rationale.	Yes	We agree with the rationale as stated in Draft Modification Report version 0.2, section 3.1 entitled Implementation Approach.
5	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes	We agree with the Panel's rationale as stated in Draft Modification Report version 0.2, section 6.1.5 entitled Legal Text.
6	Are there any further comments on P218 that you wish to make?	No	

Please send your responses by **12:00 (noon)** on **Wednesday 2 April 2008** to modification.consultations@elexon.co.uk and please entitle your email '**P218 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the BSC Panel.

Any queries on the content of the consultation pro-forma should be addressed to Ysanne Hills on 0207 380 4162, email address ysanne.hills@elexon.co.uk.



P218 Report Phase Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	Chris Welby
Company Name:	Good Energy Ltd
No. of BSC Parties Represented	1
Parties Represented	Good Energy Ltd
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	Please list all non Parties responding on behalf of (including the respondent company if relevant).
Role of Respondent	Supplier
Does this response contain confidential information?	No

Q	Question	Response	Rationale
1	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P218 should not be made? Please give rationale.	Yes	Alternative is a better solution
2	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 should not be made? Please give rationale.	No	Believe it does facilitate the objectives as previously set out

P218 Draft Modification Report Form

Q	Question	Response	Rationale
3	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 is better than the Proposed Modification? Please give rationale.	Yes	More cost efficient and simpler
4	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P218? Please give rationale.	Yes	
5	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes	
6	Are there any further comments on P218 that you wish to make?	No	

Please send your responses by **12:00 (noon)** on **Wednesday 2 April 2008** to modification.consultations@elexon.co.uk and please entitle your email '**P218 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the BSC Panel.

Any queries on the content of the consultation pro-forma should be addressed to Ysanne Hills on 0207 380 4162, email address ysanne.hills@elexon.co.uk.



P218 Report Phase Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	Graham Smith
Company Name:	Western Power Distribution
No. of BSC Parties Represented	2
Parties Represented	Western Power Distribution (South West)plc & Western Power Distribution (South Wales)plc
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	Please list all non Parties responding on behalf of (including the respondent company if relevant).
Role of Respondent	Distributors
Does this response contain confidential information?	Please clearly state which information is confidential.

Q	Question	Response	Rationale
1	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P218 should not be made? Please give rationale.	Yes	The assessment of this modification clearly revealed that it would not better facilitate the BSC objectives and would involve high costs for Parties with little or no benefit.
2	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 should not be made? Please give rationale.	Yes	As above

P218 Draft Modification Report Form

Q	Question	Response	Rationale
3	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 is better than the Proposed Modification? Please give rationale.	Yes	It is the more efficient of the two options
4	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P218? Please give rationale.	Yes	
5	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes	
6	Are there any further comments on P218 that you wish to make?	No	

Please send your responses by **12:00 (noon)** on **Wednesday 2 April 2008** to modification.consultations@elexon.co.uk and please entitle your email '**P218 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the BSC Panel.

Any queries on the content of the consultation pro-forma should be addressed to Ysanne Hills on 0207 380 4162, email address ysanne.hills@elexon.co.uk.



P218 Report Phase Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	Lisa Smith
Company Name:	Siemens Energy Services
No. of BSC Parties Represented	0
Parties Represented	0
No. of Non BSC Parties Represented (e.g. Agents)	6
Non Parties represented	NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO
Role of Respondent	Party Agent
Does this response contain confidential information?	No

Q	Question	Response	Rationale
1	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P218 should not be made? Please give rationale.	Yes	As per our previous responses we do not support P218, and do not believe that it would better facilitate Applicable BSC objectives (c) and (d).
2	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 should not be made? Please give rationale.	Yes	As above.

P218 Draft Modification Report Form

Q	Question	Response	Rationale
3	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 is better than the Proposed Modification? Please give rationale.	Yes	Although we do not support either solution, the Alternative Proposal is a less complex solution to P218, requiring fewer system and process changes (across the industry), and as such would have reduced implementation costs.
4	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P218? Please give rationale.	Yes	Although we do not support P218, the proposed implementation date would not pose a problem for SES.
5	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes/No	
6	Are there any further comments on P218 that you wish to make?	Yes/No	

Please send your responses by **12:00 (noon)** on **Wednesday 2 April 2008** to modification.consultations@elexon.co.uk and please entitle your email '**P218 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the BSC Panel.

Any queries on the content of the consultation pro-forma should be addressed to Ysanne Hills on 0207 380 4162, email address ysanne.hills@elexon.co.uk.



P218 Report Phase Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	Alex Pourcelot
Company Name:	TMA
No. of BSC Parties Represented	0
Parties Represented	Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).
No. of Non BSC Parties Represented (e.g. Agents)	4
Non Parties represented	UDMS HHDC, HHDA, NHHDA; LBSL NHHDA.
Role of Respondent	HHDC, HHDA, NHHDA
Does this response contain confidential information?	No.

Q	Question	Response	Rationale
1	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P218 should not be made? Please give rationale.	Yes	
2	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 should not be made? Please give rationale.	Yes	

P218 Draft Modification Report Form

Q	Question	Response	Rationale
3	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 is better than the Proposed Modification? Please give rationale.	Yes	As the proposed alternative modification requires fewer changes to the current processes, it would be easier to implement.
4	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P218? Please give rationale.	Yes	
5	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes	
6	Are there any further comments on P218 that you wish to make?	Yes	The rejection of the modification and its proposal only makes sense in the context of an increase in metered micro-generation sites making the proposal to only be an interim solution.

Please send your responses by **12:00 (noon)** on **Wednesday 2 April 2008** to modification.consultations@elexon.co.uk and please entitle your email '**P218 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the BSC Panel.

Any queries on the content of the consultation pro-forma should be addressed to Ysanne Hills on 0207 380 4162, email address ysanne.hills@elexon.co.uk.

P218 Report Phase Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	Martin Mate
Company Name:	British Energy
No. of BSC Parties Represented	5
Parties Represented	British Energy Direct Ltd, British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, Eggborough Power Ltd, British Energy Generation (UK) Ltd
No. of Non BSC Parties Represented (e.g. Agents)	-
Non Parties represented	-
Role of Respondent	Supplier/Generator/Trader/Consolidator/Exemptable Generator/Party Agent
Does this response contain confidential information?	No

Q	Question	Response	Rationale
1	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P218 should not be made? Please give rationale.	Yes	The proposed P218 process would not better promote BSC objective (c) relating to competition, compared to the existing baseline, as it would result in significant cross-subsidy between suppliers and between individual customers. Smearing microgeneration volume estimates between registrants of microgeneration sites would represent a retrograde step in data quality. Effective competition can only be achieved if volumes can be accurately attributed to individual suppliers. As well as not accurately attributing volumes to suppliers, the approach would lead to potentially significant cross-subsidies between customers with different usage levels or patterns. Customers with lower use of installed capacity would benefit from the higher usage of others. This would not send the right signals for efficient use of generation facilities.

P218 Draft Modification Report Form

Q	Question	Response	Rationale
			P218 would not better facilitate the achievement of BSC objective (d) relating to BSC administrative efficiency. It is a costly and complex solution. We believe the difficulty and cost of providing and using suitable metering under the existing baseline (as set by P081) have been exaggerated and we have not seen any evidence to suggest otherwise.
2	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 should not be made? Please give rationale.	Yes	<p>The same objections as given above in response to Q1 for the proposal apply to the alternative proposal.</p> <p>In addition, the Alternative Modification P218 would, by the removal of any requirement for MPANs or "pseudo" agents, and by creating new processes instead of using existing standardised processes:</p> <ul style="list-style-type: none"> • reduce transparency and increase complexity for industry as a whole (by adding special/parallel processes to be understood and administered), • increase the complexity of performance assurance and auditing of BSC processes, • increase the requirement for special central and party processes to handle microgeneration, <p>and consequently increase the risk of registration/transfer and data errors.</p> <p>We do not consider this would better facilitate BSC objectives (c) or (d).</p>
3	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 is better than the Proposed Modification? Please give rationale.	No	The Alternative Modification P218 may be a simpler and cheaper process to implement initially, but as per our response to Question 2, there would be a lack of visibility and additional complexity in principle, leading to longer term costs.
4	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P218? Please give rationale.	Yes/No	<p>P218 would have a significant impact on our current processes and would require major system changes as a result of the changes suggested (dependent on the approach chosen). Costs depend on implementation timescale and are subject to detailed analysis, but expectation is that they would be high (>£100k). Our preferred implementation period would be at least 18 months (rather than proposed 15 months) from a decision to implement. We attribute this to the following:</p> <p>a) Completing a full investigation into the impact of the proposed change(s)</p>

P218 Draft Modification Report Form

Q	Question	Response	Rationale
			<p>to our existing business processes and customers</p> <p>b) Significant changes to our database structure (and business rules) of multiple systems involving Non Half Hourly pricing, registration and billing</p> <p>c) Planning resource requirements for development, testing and implementation phases i.e. Aligning this proposed change with other significant project commitments</p> <p>d) Managing the development, testing and implementation of changes to internal and external systems</p> <p>e) Redesign of our existing business processes</p> <p>f) Training users in affected business areas in new business process</p>
5	<p>Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group?</p> <p>Please give rationale.</p>	Yes/No	Not checked.
6	Are there any further comments on P218 that you wish to make?	Yes	<p>The cost of export metering is very small compared with the cost of a microgeneration installation. If metering costs are considered an obstacle to microgeneration, then explicit subsidy for this small incremental cost should be considered. Note that the central implementation costs for this proposal would cover the costs of many thousands of export meters.</p>

Please send your responses by **12:00 (noon)** on **Wednesday 2 April 2008** to modification.consultations@elexon.co.uk and please entitle your email '**P218 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the BSC Panel.

Any queries on the content of the consultation pro-forma should be addressed to Ysanne Hills on 0207 380 4162, email address ysanne.hills@elexon.co.uk.



P218 Report Phase Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	Vara Tadi
Company Name:	Electricity North West Ltd
No. of BSC Parties Represented	one
Parties Represented	norwebd
No. of Non BSC Parties Represented (e.g. Agents)	none
Non Parties represented	
Role of Respondent	LDSO
Does this response contain confidential information?	none

Q	Question	Response	Rationale
1	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P218 should not be made? Please give rationale.	Yes	As stated in our previous response We believe that the proposed modification would not better facilitate BSC Objectives (c) and (d)
2	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 should not be made? Please give rationale.	Yes	As stated in our previous response We are of the view that the alternate modification would not better facilitate BSC Objectives (c) and (d)

P218 Draft Modification Report Form

Q	Question	Response	Rationale
3	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 is better than the Proposed Modification? Please give rationale.	No	We are still of the view that neither the proposed or alternative modification would better facilitate BSc objectives (c) and (d)
4	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P218? Please give rationale.	No	We feel that such a major change would require at least 18 months to two years to implement from the date of the authority decision
5	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.		no additional comments
6	Are there any further comments on P218 that you wish to make?	Yes	As stated in our previous response we feel that the only way we can ensure that accurate data is entering settlements would be for it to be recorded by a certifiable export meter. The cost of installing meters in the long run would probably be more cost effective than the cumbersome arrangements set out in both of the P218 proposals

Please send your responses by **12:00 (noon)** on **Wednesday 2 April 2008** to modification.consultations@elexon.co.uk and please entitle your email '**P218 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the BSC Panel.

Any queries on the content of the consultation pro-forma should be addressed to Ysanne Hills on 0207 380 4162, email address ysanne.hills@elexon.co.uk.



P218 Report Phase Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

Respondent:	Louisa Stuart-Smith
Company Name:	RWE Npower
No. of BSC Parties Represented	10
Parties Represented	RWE Trading GmbH, RWE Npower plc, Great Yarmouth Power Ltd, Npower Cogen Trading Ltd, Npower Direct Ltd, Npower Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	Please list all non Parties responding on behalf of (including the respondent company if relevant).
Role of Respondent	Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent
Does this response contain confidential information?	No

Q	Question	Response	Rationale
1	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P218 should not be made? Please give rationale.	Yes	As outlined in our response to the Assessment Consultation we believe that neither the Proposed or Alternative P218 Modifications provide an improvement to the existing solutions for dealing with microgeneration export.
2	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 should not be made? Please give rationale.	Yes	

P218 Draft Modification Report Form

Q	Question	Response	Rationale
3	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Alternative Modification P218 is better than the Proposed Modification? Please give rationale.	Yes	
4	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P218? Please give rationale.	Yes	
5	Do you agree with the Panel's view that the legal text provided in the draft Modification Report delivers the solution agreed by the Modification Group? Please give rationale.	Yes	
6	Are there any further comments on P218 that you wish to make?	No	

Please send your responses by **12:00 (noon)** on **Wednesday 2 April 2008** to modification.consultations@elexon.co.uk and please entitle your email '**P218 Report Phase Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the BSC Panel.

Any queries on the content of the consultation pro-forma should be addressed to Ysanne Hills on 0207 380 4162, email address ysanne.hills@elexon.co.uk.