

Responses from Urgent Consultation - Red-line changes to BSCP71

Consultation Issued 21 February 2007

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non- Parties Represented
1.	Centrica	BSCP71_01	9	0
2.	Lehman Brothers Commodity Services Europe	BSCP71_02	1	0
3.	E.ON UK Energy Services Ltd	BSCP71_03	0	1
4.	EDF Energy	BSCP71_04	9	0
5.	SAIC Ltd. (for and on behalf of ScottishPower)	BSCP71_05	6	0
6.	British Energy (*)	BSCP71_06	5	0

(*) Late response

P210 URGENT CONSULTATION - RED-LINE CHANGES TO BSCP71 'ECVNA AND MVRNA REGISTRATION, AUTHORISATION AND TERMINATION' QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or 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:	<i>Dave Wilkerson</i>
Company Name:	<i>Centrica</i>
No. of BSC Parties Represented	<i>9</i>
Parties Represented	<i>Accord Energy Ltd; British Gas Trading Ltd; Centrica Barry Ltd; Centrica Brigg Ltd; Centrica KL Ltd; Centrica KPS Ltd; Centrica PB Ltd; Centrica RPS Ltd; Centrica SHB Ltd</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>0</i>
Non Parties represented	
Role of Respondent	<i>(Supplier/Generator/ Trader)</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response <small>Error! Bookmark not defined.</small>	Rationale
1.	Do you agree with the changes to BSCP71? Please give rationale.	Yes	The changes introduce greater clarity on the process for submitting ECVNs/MVRNs
2.	Do you believe the changes reflect the requirements of the modification as detailed in the P210 Urgent Consultation document?	Yes	
3.	Do you have any review comments? If so please provide comments in the Electronic Document Review and Control Form (Attachment B) provided with this consultation.	No	

Q	Question	Response <small>Error! Bookmark not defined.</small>	Rationale
4.	Do you support this BSCP being implemented concurrently with Proposed Modification P210 as preferred by the Modification Group? Please give rationale.	Yes	We see the BSCP71 changes as an integral part of P210
5.	Are there any further comments on BSCP71 that you wish to make?	No	

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 on Wednesday 28 February 2007** to modifications@elexon.co.uk and please entitle your email 'P210 Urgent Modification Consultation'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

P210 URGENT CONSULTATION - RED-LINE CHANGES TO BSCP71 'ECVNA AND MVRNA REGISTRATION, AUTHORISATION AND TERMINATION' QUESTIONS

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Respondent:	<i>Kevin Brown</i>
Company Name:	<i>Lehman Brothers Commodity Services Europe</i>
No. of BSC Parties Represented	<i>1</i>
Parties Represented	<i>Lehman Brothers Commodity Services Europe</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>0</i>
Non Parties represented	
Role of Respondent	<i>Trader</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you agree with the changes to BSCP71? Please give rationale.	Yes	Supplying a higher level of clearer, more detailed information regarding ECVA processes can only benefit the industry as a whole.
2.	Do you believe the changes reflect the requirements of the modification as detailed in the P210 Urgent Consultation document?	Yes	See above.
3.	Do you have any review comments? If so please provide comments in the Electronic Document Review and Control Form (Attachment B) provided with this consultation.	No	
4.	Do you support this BSCP being implemented concurrently with Proposed Modification P210 as preferred by the Modification Group? Please give rationale.	Yes	See above

Q	Question	Response	Rationale
5.	Are there any further comments on BSCP71 that you wish to make?	No	

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Respondent:	<i>Alastair Barnsley</i>
Company Name:	<i>E.ON UK Energy Services Ltd</i>
No. of BSC Parties Represented	<i>0</i>
Parties Represented	
No. of Non BSC Parties Represented (e.g. Agents)	<i>1</i>
Non Parties represented	<i>E.ON UK Energy Services Ltd</i>
Role of Respondent	<i>Party Agent</i>
Does this response contain confidential information?	

Q	Question	Response	Rationale
1.	Do you agree with the changes to BSCP71? Please give rationale.	Yes / No	We should like to return a neutral response as the changes to BSCP71 will have no direct impact on our activities.
2.	Do you believe the changes reflect the requirements of the modification as detailed in the P210 Urgent Consultation document?	Yes / No	Please see response to question 1
3.	Do you have any review comments? If so please provide comments in the Electronic Document Review and Control Form (Attachment B) provided with this consultation.	Yes / No	Please see response to question 1
4.	Do you support this BSCP being implemented concurrently with Proposed Modification P210 as preferred by the Modification Group? Please give rationale.	Yes / No	Please see response to question 1

Q	Question	Response	Rationale
5.	Are there any further comments on BSCP71 that you wish to make?	No	

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Respondent:	Dave Morton
Company Name:	EDF Energy
No. of BSC Parties Represented	9
Parties Represented	EDF Energy Networks (EPN) plc; EDF Energy Networks (LPN) plc; EDF Energy Networks (SPN) plc; EDF Energy (Sutton Bridge Power); EDF Energy (Cottam Power) Ltd; EDF Energy (West Burton Power) Ltd; EDF Energy plc; EDF Energy Customers Plc; Seeboard Energy Limited
No. of Non BSC Parties Represented (e.g. Agents)	0
Non Parties represented	N/A
Role of Respondent	Supplier/Generator/Trader/Distributor
Does this response contain confidential information?	No

Q	Question	Response	Rationale
1.	Do you agree with the changes to BSCP71? Please give rationale.	Yes	The changes are sensible to increase transparency and understanding in relation to contract notification.
2.	Do you believe the changes reflect the requirements of the modification as detailed in the P210 Urgent Consultation document?	Yes	
3.	Do you have any review comments? If so please provide comments in the Electronic Document Review and Control Form (Attachment B) provided with this consultation.	No	

Q	Question	Response	Rationale
4.	Do you support this BSCP being implemented concurrently with Proposed Modification P210 as preferred by the Modification Group? Please give rationale.	Yes	It is assumed that if the Alternative Modification is approved then the BSCP will also have retrospective implementation.
5.	Are there any further comments on BSCP71 that you wish to make?	Yes	The changes are important to ensure that current industry understanding and practice is reflected in code subsidiary documents as well as the code itself.

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Respondent:	Gary Henderson
Company Name:	SAIC Ltd. (for and on behalf of ScottishPower)
No. of BSC Parties Represented	6
Parties Represented	ScottishPower Energy Management Ltd, ScottishPower Generation Ltd, ScottishPower Energy Retail Ltd, SP Transmission Ltd, SP Manweb plc, SP Distribution Ltd
No. of Non BSC Parties Represented (e.g. Agents)	0
Non Parties represented	N/A
Role of Respondent	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
Does this response contain confidential information?	No

Q	Question	Response	Rationale
1.	Do you agree with the changes to BSCP71? Please give rationale.	Yes	ScottishPower agree that the changes as specified provide the correct level of clarification to BSCP71. They will, in conjunction with the Mod P210 changes, amend the governance to accurately reflect the existing current best practice process used by the market.
2.	Do you believe the changes reflect the requirements of the modification as detailed in the P210 Urgent Consultation document?	Yes	ScottishPower agree that the proposed changes to BSCP71 are appropriate to support the changes in proposed modification P210.
3.	Do you have any review comments? If so please provide comments in the Electronic Document Review and Control Form (Attachment B)	No	

Q	Question	Response	Rationale
	provided with this consultation.		
4.	Do you support this BSCP being implemented concurrently with Proposed Modification P210 as preferred by the Modification Group? Please give rationale.	Yes	ScottishPower are of the firm belief that both the changes to this BSCP and the Code changes in proposed modification P210 should be implemented concurrently. The purpose of the mod is to update the governance to reflect current practice. It makes no sense to have (for however small a period) a further disconnect between the main governance document (the Code) and the operational procedures documentation (the BSCP). To not implement them together would be to introduce a further set of unnecessary complications
5.	Are there any further comments on BSCP71 that you wish to make?	No	

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

Q	Question	Response	Rationale
1.	Do you agree with the changes to BSCP71? Please give rationale.	Yes / No	We would prefer a separate BSCP for the notification process, distinct from the process for notification authorisation. However, if the cost of a separate BSCP would be significant we accept a combined BSCP. It would be preferable if the title of a combined BSCP reflected the general content eg. 'ECVNA and MVRNA Registration, Authorisation and Termination and ECVN and MVRN submission' rather than solely the submission process. Will the change of title require consequential change to other BSCPs?
2.	Do you believe the changes reflect the requirements of the modification as detailed in the P210 Urgent Consultation document?	Yes / No	In principle yes, though we have suggestions for improvement.

Q	Question	Response	Rationale
3.	Do you have any review comments? If so please provide comments in the Electronic Document Review and Control Form (Attachment B) provided with this consultation.	Yes	See proforma
4.	Do you support this BSCP being implemented concurrently with Proposed Modification P210 as preferred by the Modification Group? Please give rationale.	Yes / No	Yes, if possible, but not at any cost.
5.	Are there any further comments on BSCP71 that you wish to make?	No	

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Electronic Document Review and Control Form

Document title: BSCP71 – Submission of ECVNs and MVRNs			Document reference: N/A	Version no: 8.2
Originator: ELEXON			Reviewer: Martin Mate/John Henbest	
Review criteria (please indicate): Technical Accuracy, Level of Detail, Consistency with Source Document.				
Date issued for review: 21 February 2007		Date comments required by: 28 February 2007		Issue for use (target date): Concurrently with P210
Point no.	Location in document (page and paragraph no.)	SC	Comments by reviewer	Action (to be completed by originator)
1	Page 6, 4 th Para		After first sentence, add to effect 'It describes the process for revising or nullifying ("over-writing") previously submitted notifications. Then paragraph break before describing completely separate process of refusal or rejection etc.	
2	Page 6, 4 th para		Suggest for clarity: "It also provides details of the rules for: Refusal or rejection of an otherwise valid notification because of credit default, Termination of ECVNA and MVRNA authorisations, Procedures to allow Contract Trading Parties to nullify..."	
3	Page 8, 2.1		Add EWS to acronyms.	
4	Page 38, 3.15.3, Action		Acceptance Feedback Report only if period submitted is within 72 periods (36 hours). (For later periods reliance has to be on 7 day report).	

5	Page 39, 3.15.5, When		<p>The Notification Report is issued at the end of each day or more commonly early the following day, regardless of whether any submissions have been made. Not clear why Settlement Day is specified rather than just day.</p> <p>Note that following rectification of any errors (eg. ECVAA failure), a party may request transmission of corrected Notification Reports in relation to a day from ECVAA by request to [Logica Helpdesk?]</p>	
6	Page 39, 3.15.6, When		<p>The Forward Contract Report (if requested) is issued at intervals during each day regardless of whether any submissions have been made. Again not clear why Settlement Day is specified rather than just "day".</p>	
7	Page 61, section 4.16		<p>Should there be an opening sentence explaining that notifications must be made by electronic means in accordance with [the Communications Requirements Document / Interface Definition Document / ECVAA Web Service?] or, in the case of correction following an ECVAA failure, by a method agreed with BSCCo ?</p>	
8	Page 61, For ECVNs		<p>Could be useful for new entrants to specify "ECVN Identifier (consisting of ECVNAA Identifier and a reference code provided by ECVNA)</p>	
9	Page 61, 6 th bullet.		<p>Reference is made to 'Settlement Periods' when what it meant is the Settlement Period number between 1 and 46/48/50.</p>	
10	Page 61, MVRNs		<p>Missing reference to Settlement Period to which it relates, which as for ECVN should be referred to in terms of settlement period reference number as in the software.</p>	

11	Page 61, MVRNs		Metered Volume Reallocation expressed as a fixed reallocation and a percentage reallocation. There is not a choice for one or the other.	
12	Page 62, 4.16.2		Should be "... a previously-submitted notification with the same ECVNA Identifier and ECVNAA Identifier will be treated as separate and additional to...." ?	
13	Page 62, 4.16.3 1 st sentence.		Should be "... an existing notification with the same ECVNA Identifier and ECVNAA Identifier, for any..."	
14	Page 62, 4.16.3, 1 st para and/or 1 st bullet		Should specify 'for periods for which gate closure has not passed'. Bring last bullet to top?	
15	Page 62, 4.16.3		References are made to 'Settlement Period' where what is really meant is 'settlement period reference number' between 1 and 46/48/50.	
16	Page 62, 4.16.3 last paragraph.		Clarification of exactly what is practically required to achieve overwrite of an existing ECVN by another Authorisation would be useful. An example?	
17	Page 63, 4.17.2		Does the software check regardless of whether the conditions for requiring a check are met? Efficient software would check only if required.	
18	Page 63, 4.17.2		Refusal and rejection are related to refusal period and rejection period, not directly to CCP>90%. (there is a few periods offset). 2 nd para is clear on this for refusals, 3 rd para is not as clear, only referring to rejection period at end.	
Date:		Reviewer requests a subsequent review Yes/No*		

Severity Codes (SC):

H (high): Prejudices document's conclusions, recommendations or fitness for purpose.

M (medium): Matter of substance but not *high*.

L (low): Minor error but document's intention is clear.