

## P257 Consultation Responses

Consultation issued on 19 May 2010

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

We received responses from the following Parties

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
TMA Data Management Ltd	0/1	NHHDC, NHHDA, HHDC and HHDA
MRASCo Ltd	0/1	MRA
Western Power Distribution	2/1	Distributor, MOA
RWE Npower	8/0	Supplier / Party Agent
E.ON UK	6/0	Supplier / Generator / Trader / Consolidator / Exemptable Generator
Scottish Power PLC	4/2	Supplier/Generator/Trader/Party Agent
EDF Energy	13/0	Supplier/Generator/Trader/Consolidator/Exemptable Generator/Party Agent/Distributor

Question 1: Would the Proposed Modification P257 help to achieve the Applicable BSC Objectives?

### Summary

Yes	No	Neutral/Other
7	0	0

### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	By allowing Elexon to close invalid Disputes, the Proposed Modification allows the TDC to concentrate on valid Trading Disputes. It also removes the superfluous Query Process, helping to better achieve Applicable BSC Objective d.

P257 Assessment Consultation Responses

4 June 2010

Version 1.0

Page 1 of 7

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Respondent	Response	Rationale
MRASCo Ltd	Yes	By allowing ELEXON the ability to close Trading Disputes that do not meet the Disputes criteria, it meets applicable objective d- efficient administration.
Western Power Distribution	Yes	The proposed modification meets applicable objective D as it removes an unnecessary trading query process. It is more efficient than the current arrangements.
RWE Npower	Yes	Streamlining the process will make it more efficient and by allowing Trading Queries to be removed this will result in less administration, which will result in time/cost savings. Applicable to BSC Objective D.
E.ON UK	Yes	As identified by the TDC and Modification Group, by removing unnecessary steps to simplify the Trading Disputes process P257 will aid clarity and efficiency to administration of the BSC, furthering Applicable Objective D.
Scottish Power PLC	Yes	By removing the need for trading Queries, we are clearly reducing the potential for duplication in the dispute process, as well as reducing any confusion that arises when trying to understand the differences between what is a Trading Query and a Trading Dispute. In addition, the TDC process itself should be more efficient by allowing ELEXON to close invalid disputes- although the raising party should still have the right to appeal ELEXONs decision to TDC. In the majority of cases this should significantly streamline the process. For these reasons we believe that this Modification will better facilitate Applicable BSC Objective (D) i.e. Promoting efficiency in the implementation & administration of the BSC arrangements
EDF Energy	Yes	-

Question 2: Do you believe that there are any alternative solutions which the Modification Group has not identified, and which it should consider?

### Summary

Yes	No	Neutral/Other
0	7	0

### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	
MRASCo Ltd	No	It streamlines the process- applicable objective d
Western Power Distribution	No	-
RWE Npower	No	-
E.ON UK	No	-
Scottish Power PLC	No	-
EDF Energy	No	-

Question 3: The Group believes that the P257 changes to the BSC should be implemented either on:

- 04 November 2010 if an Authority decision is reached by 24 September 2010; or
- the Next Available Release if a decision is made after 24 September 2010.

Do you agree?

### Summary

Yes	No	Neutral/Other
7	0	0

### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	-
MRASCo Ltd	Yes	Changes can be implemented promptly, and Parties have a clear date for when processes apply- applicable objective (d)
Western Power Distribution	Yes	These changes should be implemented as part of a planned release and do not warrant the additional cost of a separate release. Modification P257 should be implemented at the same time as P256 and P258
RWE Npower	Yes	We would like to see this modification implemented ASAP.
E.ON UK	Yes	-
Scottish Power PLC	Yes	Given that no system changes will be required if this Modification is approved by the Authority – we believe that it should be implemented at the first available release - which in this case would mean the earliest date this would in fact be implemented is 4 <sup>th</sup> November 2010 providing the Authority reaches its decision by 24 <sup>th</sup> Sep 2010.
EDF Energy	Yes	-

- Question 4: The Groups initial views are that it believes that P257 will better facilitate the achievement of Applicable BSC Objective (d) when compare to the existing BSC requirements. Do you agree?

## Summary

Yes	No	Neutral/Other
7	0	0

## Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	As in response to question 1.
MRASCo Ltd	Yes	Quicker, shorter process and efficiency gains.
Western Power Distribution	Yes	The proposed process is more efficient.
RWE Npower	Yes	By removing the concept and handling of Trading Queries, which debate and analysis has shown can be effectively administered within the Trading Disputes process, the proposal will streamlining the overall error rectification process and hence promote and encourage the effective administration of the Balancing and Settlement systems and processes.
E.ON UK	Yes	P257 will indeed help support Objective D through streamlining existing procedures.
Scottish Power PLC	Yes	Clearly the changes proposed here will make the dispute process more efficient (by removing duplication) and easier to follow by removing the confusion around trading queries and disputes and as such will better facilitate the achievement of BSC Objective D when compared to the existing BSC arrangements.
EDF Energy	Yes	-

## Question 5: Can you envisage a Query process in addition to the dispute process that would add value?

### Summary

Yes	No	Neutral/Other
2	4	1

### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	The first stage of a potential Trading Dispute is the assessment by Elexon, this is the equivalent of a Query process and as such a Query process in addition to the dispute process would not add any value, on the contrary.
MRASCo Ltd	n/a	-
Western Power Distribution	No	As discussed by the modification group, the existing query process replicates many aspects of the trading disputes process. It is likely that any query process would involve at least some duplication and it would therefore not be a good use of resources. The proposed, amended trading dispute process gives the option of efficiently closing down a dispute if investigation reveals there is no error and this removes the need to have any additional query process.
RWE Npower	No	The BSCCo. already advise Parties on what constitutes a Trading Dispute, effectively giving Parties the opportunity to withdraw a Trading Query
E.ON UK	No	The current distinction between a Trading 'Query' and 'Dispute' clearly seems ineffective and adds unnecessary complication and worthless administration to the Disputes process. So long as any Query or Dispute is always going to go before the TDC there seems no value in continuing any such distinction.
Scottish Power PLC	Qualified yes	Only if the proposed Modification P256 is not implemented i.e. regarding the changes to the SVA HH deadlines. If this occurs then we believe further consideration would have to be given to retaining the precautionary query process which maybe required for raising post RF disputes. However, given that the BSCP11 review was all about improving the both the efficiency and understanding of the dispute process a query process would not actually add any value if P256 was approved.
EDF Energy	Yes	The query process was originally created to register queries which were still capable of resolution by mutual agreement of all concerned, but where further

Respondent	Response	Rationale
		investigation might be necessary to agree changes to be made. However, Parties currently appear generally comfortable with the resolution processes with agents outside the formal query process, and the current manually intensive query process adds limited value. If the number of actual or potential disputes were to increase significantly, for whatever reason, there might be benefit in some kind of query process to monitor and help manage efficiently the issues arising. In this event a further modification proposal would be appropriate.

## Question 6: Do you have any further comments on P257?

### Responses

Respondent	Response
TMA Data Management Ltd	No
MRASCo Ltd	No
Western Power Distribution	No
RWE Npower	RWE npower have no further comments to make, at this time.
E.ON UK	No
Scottish Power PLC	No
EDF Energy	No