

P257 Consultation Responses: Removal of the Concept of Trading Queries

Consultation issued on 13 July 2010

We received responses from the following Parties

	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
TMA Data Management Ltd	0/1	HHDC, HHDA, NHHDC and NHHDA
Thames Power Services	1/0	Generator
Centrica	10/0	Supplier/Generator/Trader
National Grid	1/0	Transmission Company
Spark Energy	1/0	Supplier
Scottish Power PLC	4/2	Supplier/Generator/Trader/ Party Agent
npower Limited	8/1	Supplier / Party Agent
EDF Energy	13/0	Supplier/Generator/Trader/Co nsolidator/Exemptable Generator/Party Agent/Distributor
E.ON UK	6/0	-

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Question 1: Do you agree that the Panel's recommended legal text and CSD changes deliver the solution agreed by the Modification Group?

Summary

Yes	No	Neutral/Other
8	0	1

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	-
Thames Power Services	Yes	-
Centrica	Yes	-
National Grid	Yes	No further comments
Spark Energy	Yes	-
Scottish Power PLC	Yes	-
npower Limited	Yes	npower agrees that the CSD changes and legal text drafting adequately deliver the proposed solution as recommended by the Modification Panel
EDF Energy	-	We have not checked the detail of these documents.
E.ON UK	Yes	It appears appropriate.

Question 2: The Panel has initially recommended an implementation approach of:

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

Do you agree with the Panel's recommended implementation date?

Summary

Yes	No	Neutral/Other
9	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	-
Thames Power Services	Yes	It seems reasonable to implement this at the first available opportunity in tandem with a routine release.
Centrica	Yes	-
National Grid	Yes	No further comments
Spark Energy	Yes	-
Scottish Power PLC	Yes	With no system changes to be released the Modification should be included within the first available release after Authority approval is granted.
npower Limited	Yes	We would like to see this modification implemented ASAP.
EDF Energy	Yes	Implementation at the next available release, preferably with sufficient notice to amend internal procedures and minimise impact of existing queries, is a pragmatic approach.
E.ON UK	Yes	This should be implemented promptly.

Question 3: Do you agree with the Panel's initial recommendation that:

P257 will better facilitate the achievement of Applicable BSC Objective (d) when compared with the existing BSC Arrangement; and

P257 should therefore be approved?

Summary

Yes	No	Neutral/Other
9	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	
Thames Power Services	Yes	The recommendation to delete the Trading Queries option will remove any ambiguity with Trading Disputes, streamline the process and make the disputes process much clearer to BSC Parties.
Centrica	Yes	Centrica supports the unanimous view of the Panel
National Grid	Yes	National Grid agrees with the Panel's view that P257 will better facilitate applicable BSC Objective (d) and should be approved.
Spark Energy	Yes	-
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.
npower Limited	Yes	Streamlining the process will make it more efficient and by allowing Trading Queries to be removed will result in less administration and hence bring time/cost savings. Applicable to BSC Objective D.
EDF Energy	Yes	The original purpose of the query process was to allow a potential error, which might become a valid BSC Trading Dispute, to be raised and recorded, with further investigation by BSCCo, BSCCo Agents, Parties, Party Agents and the Transmission Company as appropriate. The outcome of the process is

Respondent	Response	Rationale
		resolution of the query, rejection of it, or escalation to a BSC Trading Dispute requiring a TDC decision. In practice, parties have not generally raised queries until after initial investigation, most queries have related to SVA metering, there have not been many queries, and consequently the distinction between queries and disputes has complicated the process without providing significant benefits. Therefore we support the Panel recommendation that removal of the concept of Trading Queries would better meet BSC Objective (d), promoting efficiency in administration of the BSC.
E.ON UK	Yes	As identified by the TDC and Group, by removing unnecessary steps to simplify the Trading Disputes process P257 will aid clarity and efficiency of BSC administration, minimising wasted time and costs for Parties and ELEXON thus furthering Applicable Objective D.

Question 4: Do you have any further comments on P257?

Responses

Respondent	Response
TMA Data Management Ltd	No
Thames Power Services	No
Centrica	No
National Grid	No further comments
Spark Energy	No
Scottish Power PLC	No
npower Limited	No
EDF Energy	<p>We note discussion on whether the term "dispute" could be misinterpreted by new and smaller parties. This modification relates specifically to a particular defined "Trading Dispute", usually concerning whether data is correct according to BSC rules, rather than a dispute in the general sense, and we are content with the current usage which has been in place for many years.</p> <p>We note that if the volume of Trading Disputes were to significantly increase, further changes to the BSC might be required to achieve overall efficiency.</p>
E.ON UK	No