



82/009

THIRD INTERIM REPORT for Modification Proposal P157 Replacement of current Supplier Charges rules

Prepared by: VASMG

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This document has been distributed in accordance with Section F2.1.10¹ of the Balancing and Settlement Code.

RECOMMENDATIONS

The VASMG invites the Panel to;

- **NOTE** the contents of this third Interim Report;
- **NOTE** the Proposed and Alternative Modifications developed by the Group;
- **NOTE** the additional work that will be undertaken in the one month Assessment Procedure;
- **NOTE** that the Assessment Report will be presented to the Panel at its meeting on 14th October 2004.

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¹ The current version of the Balancing and Settlement Code (the 'Code') can be found at <http://www.elexon.co.uk/bscrelateddocs/BSC/default.aspx>

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SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

As far as the VASMG has been able to assess, the following Parties/documents have been identified as being potentially impacted by Modification Proposal P157.

Parties	Sections of the BSC	Code Subsidiary Documents
Suppliers <input checked="" type="checkbox"/>	A <input type="checkbox"/>	BSC Procedures <input checked="" type="checkbox"/>
Generators <input checked="" type="checkbox"/>	B <input type="checkbox"/>	Codes of Practice <input type="checkbox"/>
Licence Exemptable Generators <input checked="" type="checkbox"/>	C <input type="checkbox"/>	BSC Service Descriptions <input type="checkbox"/>
Transmission Company <input type="checkbox"/>	D <input type="checkbox"/>	Service Lines <input type="checkbox"/>
Interconnector Users <input checked="" type="checkbox"/>	E <input type="checkbox"/>	Data Catalogues <input type="checkbox"/>
Distribution System Operators <input type="checkbox"/>	F <input type="checkbox"/>	Communication Requirements Documents <input type="checkbox"/>
Party Agents		
Data Acquirers <input type="checkbox"/>	G <input type="checkbox"/>	Reporting Catalogue <input type="checkbox"/>
Data Collectors <input type="checkbox"/>	H <input type="checkbox"/>	MIDS <input type="checkbox"/>
Meter Operator Agents <input type="checkbox"/>	J <input type="checkbox"/>	Core Industry Documents
ECVNA <input type="checkbox"/>	K <input type="checkbox"/>	Grid Code <input type="checkbox"/>
MVRNA <input type="checkbox"/>	L <input type="checkbox"/>	Supplemental Agreements <input type="checkbox"/>
BSC Agents		
SAA <input type="checkbox"/>	M <input type="checkbox"/>	Ancillary Services Agreements <input type="checkbox"/>
FAA <input type="checkbox"/>	N <input type="checkbox"/>	Master Registration Agreement <input type="checkbox"/>
BMRA <input type="checkbox"/>	O <input type="checkbox"/>	Data Transfer Services Agreement <input type="checkbox"/>
ECVAA <input type="checkbox"/>	P <input type="checkbox"/>	British Grid Systems Agreement <input type="checkbox"/>
CDCA <input type="checkbox"/>	Q <input type="checkbox"/>	Use of Interconnector Agreement <input type="checkbox"/>
TAA <input type="checkbox"/>	R <input type="checkbox"/>	Settlement Agreement for Scotland <input type="checkbox"/>
CRA <input type="checkbox"/>	S <input checked="" type="checkbox"/>	Distribution Codes <input type="checkbox"/>
Teleswitch Agent <input type="checkbox"/>	T <input type="checkbox"/>	Distribution Use of System Agreements <input type="checkbox"/>
SVAA <input type="checkbox"/>	U <input type="checkbox"/>	Distribution Connection Agreements <input type="checkbox"/>
BSC Auditor <input type="checkbox"/>	V <input type="checkbox"/>	BSCCo
Profile Administrator <input type="checkbox"/>	W <input type="checkbox"/>	Internal Working Procedures ² <input checked="" type="checkbox"/>
Certification Agent <input type="checkbox"/>	X <input checked="" type="checkbox"/>	Other Documents
MIDP <input type="checkbox"/>		Transmission Licence <input type="checkbox"/>
TLFA <input type="checkbox"/>		
Other Agents		
SMRA <input type="checkbox"/>		
Data Transmission Provider <input type="checkbox"/>		

X = Identified in Report for last Procedure

N = Newly identified in this Report

² the PARMs system is a BSCCo run system and is impacted by P157.

1 DESCRIPTION OF PROPOSED MODIFICATION

1.1 Modification Proposal

Modification Proposal P157 'Replacement of current Supplier Charges rules', (P157, Reference 1), was raised on 5 January 2004 by EDF Energy. P157 proposes to replace the current Supplier Charges rules in Annex S-1 of the Code with a robust set of rules that adhere to the proposed criteria for a corrective technique suggested by the Volume Allocation Standing Modification Group (VASMGM) in its report to the Balancing and Settlement Code Panel (the 'Panel') on Issue 6 'Appropriateness of the Current Supplier Charging Mechanism' (Reference 2).

The Proposer believes that a clear and readily understood set of rules would assist with the drive to improve the quality of data entering Settlement. The latest BSC Audit was qualified and it is the Proposer's view that a major contributory factor to this was the level of poor data quality in Supplier Volume Allocation portion of the market, especially within the Non Half Hourly (NHH) sector. Supplier Charges are intended to be a corrective technique for this issue, but the recent work of the VASMGM on Issue 6 has raised serious concerns over the appropriateness of the current rules and their effectiveness as a corrective technique.

The Proposer considers that P157 would better facilitate the achievement of Applicable BSC Objectives (c) and (d). The achievement of Applicable BSC Objective (d) - promoting efficiency in the implementation and administration of the balancing and settlement arrangements, would be achieved by P157 since the quality of data entering Settlement will be improved through the introduction of a Supplier Charges mechanism that is easily understood and that provides incentives on Parties. The Proposer further argues that any mechanism that is effective in improving data quality should also better facilitate the achievement of Applicable BSC Objective (c) – promoting effective competition in the generation and supply of electricity, and promoting such competition in the sale and purchase of electricity.

The P157 Initial Written Assessment (IWA, Reference 3) was presented to the Panel at its meeting on the 15 January 2004. In raising P157, the Proposer did not propose a specific solution. Instead, the aim was that the detailed work required to consider and design a replacement to the current Supplier Charges rules should be undertaken as part of the Modification Procedure. For this reason, the Panel submitted P157 to a two-month Definition Procedure.

The Definition Report (Reference 4) was presented to the Panel at its meeting on 11 March 2004. The Panel decided to submit P157 to a three-month Assessment Procedure, with an Assessment Report scheduled to be presented to the Panel at its June 2004 meeting.

During the initial stage of the Assessment Procedure, the Group issued a consultation document (Reference 5) to the Industry detailing its initial conclusions regarding the Proposed Modification and a number of potential alternative solutions.

At its meeting on 13 May 2004, the Panel requested that the Group present an Interim Report at the next Panel meeting to enable the Panel to seek provisional thinking from the Authority. An Interim Report was presented (Reference 6) and the request for provisional thinking was made. The Authority delivered its provisional thinking on 25 June 2004 such that it could be considered at the July 2004 Panel meeting. At this meeting, the Panel also considered a second Interim Report (Reference 7) submitted to it by the Group, which contained the Group's views on the Authority's provisional thinking. The Panel instructed the Group to provide a Modification to it at the September Panel meeting and that it should include the following aspects:

- A suitable calculation for in-house Supplier costs to correct bad data for Serial SP08a;

- Not Bond Rebate - A method that is linked to the target Standard and hence supports its attainment (continuous and monotonic); and
- No cap on a "basket" of Serials (this direction was clarified at the August Panel meeting).

The Group issued a second assessment consultation document (Reference 8) to industry and having considered the views presented, finalised the composition of the Proposed and Alternative Modification and agreed its provisional recommendation to the Panel.

The Group has issued this Interim Report to record the details of the Proposed and Alternative Modifications it had developed and to specify the additional work it required to complete the Assessment Procedure. The Panel at its meeting on 2nd September 2004 granted a one month extension to the P157 Assessment Procedure to perform this further analysis and noted that the extra month would allow for new Scottish participants to consider P157 and inform its progress.

1.2 Proposed Modification

There will be Supplier Charges on Serials SP01, SP02, SP04, SP08a, b and c (see Annex 2 for description of the Serials). The charges are a genuine pre-estimate of loss and for SP08a this charge includes the in house costs for a Supplier to correct imperfect data. SP01 and SP02 will be charged on a national £ per day basis only i.e. not charged per GSP Group, SP04 will be charged on a £ per day basis as it is currently and SP08a, b and c on a £ per MWh basis. The charges for SP08 a, b and c will be capped overall such that no Supplier shall pay more than 1% of its Supplier Take*Credit Assessment Price in any GSP Group - SP01, SP02 and SP04 charges will not be capped. SP01 and SP02 will cease to be applied after 12 months has passed. The funds collected will be used in the following manner. 10% will be circulated to all Trading Parties based on their Main Funding Shares. The remaining 90% will be redistributed on a GSP Group basis according to NHH market share – this is the current method of redistribution.

The level of the charges will be reviewed at the Panel's request at least once every two years. Revised charges will be calculated using the methodology contained in the Code.

1.3 Alternative Modification

The Alternative Modification is the same as the Proposed Modification in all aspects except the redistribution. In the Alternative Modification, the funds collected will be used in the following manner. 10% will be circulated to all Trading Parties based on their Main Funding Shares. The remaining 90% will be redistributed on a GSP Group basis to NHH Suppliers who have either achieved the performance Standard (97%) or have performed above average on SP08a for the GSP Group. The amount each Supplier will receive will be dependent on how far above the average it is and whether it has achieved the Standard.

The Modification Group believes that the Alternative Modification fulfils the directions of the Panel to the Group.

1.4 Summary Table

Aspect of P157	Proposed Modification	Alternative Modification
Serials	SP01, 2, 4, 8a, 8b, 8c	As per Proposed
Genuine pre-estimate	SP01 and SP02 – administration charges	As per Proposed

of loss (GPOL)	SP04 – error in profiles SP08a – value of volume of energy that is uncertain, central incremental costs and in house costs to correct bad data SP08b and c - value of volume of energy that is uncertain, central incremental costs	
Redistribution	Leave as currently	Average performance with amount received being relative to amount above average and an additional (2x share) if above Standard on a GSP Group basis
Caps	Amended cap on SP08a, b and c only 1%*Supplier Take*CAP	As per Proposed
Implementation Date	Calendar Day July 2005 (provisional)	Calendar Day November 2005 (provisional)

2 COSTS

The Impact Assessment details are being amended.

The costs of the different aspects of P157 and the overall costs of amending PARMS for the Proposed and Alternative Modifications are:

		Cost	Tolerance
1	Cutover Control	£8k	10%
2	Redistribution Based on Average Performance on SP08a	£112k	20%
3	Charging	£26k	15%
4	Reporting without Average performance	£42k	15%
5	Reporting with Average performance	£42k	15%

Proposed Modification (1,3,4)	£76k
Alternative Modification (1,2,3,5)	£188k

Note: this does not include ELEXON implementation costs which will be included in the final Assessment Report.

3 ISSUES RAISED

3.1 Assessment against the Applicable BSC Objectives

The Group considered the question of whether P157 better facilitated the achievement of the Applicable BSC Objectives.

The Group considered the achievement of Applicable BSC Objectives (c) and (d) as being most suitable for P157:

Applicable BSC Objective c) - promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity;

Applicable BSC Objective d) - promoting efficiency in the implementation and administration of the balancing and Settlement arrangements.

3.1.1 Proposed Modification

A minority of the Group considered that overall the Proposed Modification better facilitated the achievement of the Applicable BSC Objectives. The Group and consultation respondents' comments that are relevant to the current Proposed Modification are:

- Revision of GPoL will make the process more cost reflective since the charges are more accurate;
- The existing cap calculation was not considered justifiable and has been removed. An amended cap has been introduced (see section on caps below) – having no cap was seen as being a barrier to entry to Parties and a cap that is inappropriate and is invoked frequently is detrimental to competition since Parties will not be incentivised to improve data as their maximum liability is not significant;
- Supplier Charges are supposed to be compensatory and the current redistribution does that.

A majority did not believe that the Proposed Modification better facilitated the achievement of the Applicable BSC Objectives:

- The reason the current mechanism does not provide an incentive is because of the redistribution – it is possible for a Party to receive back via the current redistribution much of the monies it paid out;
- The level of monies that will be circulated under P157 will be of a magnitude less than the level of monies that are currently circulated;
- The proposal makes gross assumptions in order to derive and apply average charge rates for poor performance against Serials, particularly SP08a, b, c. The proposed charges disregard individual Supplier data accuracy performance, and assume an average accuracy of estimated data based on a limited sample of doubtful validity. This will give charges which are overgenerous for some parties and penal for others, and for HH Suppliers this discrimination will be greater than under the current arrangements due to the higher proposed rates.

3.1.2 Alternative Modification

A majority of the Group considered that overall the Alternative Modification better facilitated the achievement of the Applicable BSC Objectives as compared to both the baseline and the Proposed Modification. The Group and consultation respondents' comments relevant to the Alternative Modification are:

- Revision of GPOL will make the process more cost reflective since the charges are more accurate;
- The existing cap calculation was not considered justifiable and has been removed. An amended cap has been introduced (see section on caps below) – having no cap was seen as being a barrier to entry to Parties and a cap that is inappropriate and invoked frequently is anticompetitive since Parties will not be incentivised to improve data as their maximum liability is not significant;
- It should act as an incentive on Parties to address poor data quality issues – mainly as a result of the amended redistribution;
- The disincentive for a new Party to enter the market is reduced since there is less uncertainty in the market;
- P157 should improve performance (since amended redistribution will provide an incentive) and this should therefore reduce uncertainty within the market and less time and money should be spent on improving poor performance and consequently reduce costs;
- The efficiency of BSCCo should increase as less time should be required to be spent on improving poor performance and dealing with data quality issues;
- The level of monies that will be circulated under P157 will be of a magnitude less than the level of monies that are currently circulated. However, this may still better meet the applicable BSC objectives if the monies are circulated amongst the right Parties.

However a minority considered that the Alternative Modification did not better facilitate the achievement of the Applicable BSC Objectives:

- P157 does not create a clear, transparent and predictable incentive which was the defect identified by the Modification Proposal;
- The Alternative Modification redistribution could be discriminatory by nature, and thus would not meet the Applicable BSC Objectives;
- The Alternative represents a shift away from charges being related to the Genuine Pre Estimate of Loss and the use of Liquidated Damages to a system of fines and incentives;
- The proposal is more complicated;
- The industry has yet to see the benefits from P99 so it is difficult to calculate if P157 is better than the current mechanism in place;
- The proposal makes gross assumptions in order to derive and apply average charge rates for poor performance against Serials, particularly SP08a, b, c. The proposed charges disregard individual Supplier data accuracy performance, and assume an average accuracy of estimated data based on a limited sample of doubtful validity. This will give charges which are overgenerous for some parties and penal for others, and for HH Suppliers this discrimination will be greater than under the current arrangements due to the higher proposed rates.

3.1.3 CAPS

The Group discussed the cap (1%*Supplier Take*Credit Assessment Price) and whether it was appropriate to maintain a cap and apply it to all Suppliers.

The Group were keen to retain the cap for the reasons it had previously stated:

- Caps stop significant liability in exceptional circumstances rather than limiting liability under normal circumstances;

- Small Parties (small both in energy and number of MPAN terms) will, in the opinion of the Group and consultation respondents, be put off entering the market if there was no cap and hence significant liability under Supplier Charges;
- Charges without caps may become penal in nature;
- The perceived lack of competition amongst Agents would make it very difficult for Suppliers to transfer the risk of Supplier Charges hence lack of caps would increase the cost to the market since no Agent would take on the risk of such significant liability from the Supplier.;
- Small Suppliers (small both in energy and number of MPAN terms) have problems negotiating contracts with Agents;
- Parties are willing to forgo the compensation due to them in order to have the security of a cap in place in the market;
- The new cap calculation takes Supplier size into account and hence is considered proportional and more appropriate than the current cap. In addition it is simpler to work out and reflects the fact that there is approximately 1% margin in the Supply business and the cap is set right at that margin.

The Group had considered Ofgem's concerns regarding caps and reiterated that it had rejected the old capping mechanism as inappropriate and had introduced a new cap that was different in nature and was appropriate for the business environment (and indeed was standard business practice). The Group had also considered Ofgem's concerns, in particular that of applying a cap to a basket of Serials, and had thus applied the cap (1% of its Supplier Take*Credit Assessment Price) only to Serials SP08a, b and c and not to have the cap being applied to charges on SP01, SP02 and SP04.

Further to the discussion on caps the Group considered that it wanted more analysis done to confirm its view that the new cap was indeed a lot higher than the current cap and would rarely be invoked. The performance of all Suppliers in one month would be taken from the PARMS system. The new charges and cap would be applied to this data and the Group would consider the results. To perform this analysis the Group requested an extra month of Assessment.

3.1.4 Review of Supplier Charges

The Group considered whether and how the genuine pre-estimate of loss value should be reviewed. The Group considered the current increase in the value according to RPI that is currently contained in Annex S-1 of the Code and after looking at the response to the last consultation document, the Group decided that the value of the genuine pre-estimate of loss should be reviewed every 2 years.

Details of the review and the reasoning behind each aspect are given below:

- The Panel would have charge of the review but is likely to delegate this to ELEXON to perform. This is the same as several other reviews that are undertaken under the Code;
- The review would rerun the methodology that was confirmed under P157 (see section 2.1.2 above) using more up to date data where possible;
- The results of the review would not go out for industry consultation since the methodology used would have been agreed by the industry as part of P157 and the Code would make participants aware that the value of the genuine pre-estimate of loss could either reduce or increase;
- The Panel would approve the review; and
- A circular would be issued warning Parties of the review and also of the change, if any, in the values. The values will also appear on the BSC Website.

The methodology confirmed as being used to calculate the genuine pre-estimate of loss under P157 was consulted on as being outlined in one of the relevant BSCPs. Any change in the methodology used to calculate the genuine pre-estimate of loss could only have occurred via a Change Proposal and would therefore undergo full industry consultation as provided for under BSCP40. However the Group have reconsidered this and believe it is important to have the methodology contained within the Code such that any amendment would go via the Modification Process. This was since the Group felt it should be considered against the Applicable BSC Objectives and go to Ofgem for decision via the Panel as well as undergoing industry consultation (as it would under BSCP40).

To record the methodology and incorporate it into the Code would take additional time and the Group felt it was important to have the legal text included within for the Assessment Report and hence reiterated its request for a further month to assess P157.

3.1.5 Implementation Date

The Group considered the previously suggested Implementation Date of July 2005 and decided to reassess this date since the Assessment Procedure had been extended several times. The Group noted that a Calendar Day implementation would have a retrospective effect, but felt that it was justified as a date set in the future would ensure that Parties had enough time to improve performance before the new charges took effect.

The Implementation Date recommended by the Group for the Proposed Modification is a Calendar Day, July 2005 Implementation Date since there will only be changes to the charges and the cap. For the Alternative Modification a Calendar Day, November 2005 Implementation Date is suggested as more complex changes are required and there is a major change to the redistribution mechanism in addition to the cap and the charges. This means that longer is required for the system changes to be implemented as well as for Parties to be aware of the new rules and amend their systems and processes. These Implementation Dates are provisional.

The advantages of a Calendar Day Implementation Date are as follows:

- Calendar Day implementation means that the old rules are stopped and the new ones started. There are thus no problems deciding how to combine the new rules with the old especially regarding caps and redistribution which are calculated on a Parties overall position for any given month;
- Calendar Day implementation set for a future date means that Parties will know the rules in advance of the implementation. In this way the problem of lack of knowledge of obligations that would be associated with an earlier Calendar Day implementation (e.g. November 2004), is ameliorated;
- A July 2005 or post July 2005 Implementation Date allows pre P99 rules to be fully run off before P157 is introduced hence data used in P157 will be solely post P99 data; and
- Development can take place in the scheduled June 2005/November 2005 Release, which will allow system and process changes to be made in the most efficient manner.

4 DOCUMENT CONTROL

4.1 Authorities

Version	Date	Author	Reviewer
0.1	29/08/04	Dena Harris	ELEXON
0.2	01/09/04	Dena Harris	P157 Modification Group - VASMG
0.3	01/09/04	Dena Harris	ELEXON
0.3	03/09/04	Dena Harris	Panel

4.2 References

Ref	Document	Owner	Issue date	Version	Document Link
1	P157 Modification Proposal	N/a	05/01/04	1.0	http://www.elexon.co.uk/documents/modifications/157/P157.pdf
2	Issue 6: Report from the VASMG	VASMG	07/11/03	Final	http://www.elexon.co.uk/documents/BSC_Panel_and_Panel_Committees/BSC_Panel_Meetings_2003_-_069_-_Papers/69_020.pdf
3	P157 Initial Written Assessment	ELEXON	09/01/04	1.0	http://www.elexon.co.uk/documents/modifications/157/71_012a.pdf
4	P157 Definition Report	ELEXON	05/03/04	1.0	http://www.elexon.co.uk/documents/modifications/157/74_012a_P157DR.pdf
5	P157 Assessment Consultation	ELEXON	10/05/04	1.0	http://www.elexon.co.uk/documents/modifications/157/P157AC10.doc
6	P157 Interim Report	ELEXON	04/06/04	1.0	http://www.elexon.co.uk/documents/modifications/157/78_009a_P157_IR.pdf
7	P157 Second Interim Report	ELEXON	02/07/04	1.0	http://www.elexon.co.uk/documents/modifications/157/79_005a_P157_IR.pdf
8	P157 Second Assessment Consultation	ELEXON	20/07/04	1.0	http://www.elexon.co.uk/documents/modifications/157/P157_Assessment_Consultation_(2)_Document.pdf

ANNEX 1 MODIFICATION GROUP DETAILS

Member	Organisation	Email	15/03 /04	23/03 /04	02/04 /04	28/04 /04	28/05 /04	18/06 /04	28/06 /04	12/07 /04	13/08 /04	27/08 /04
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Martin Mate	British Energy	martin.mate@british-energy.com	N	Y	N	N	N	N	N	N	Y	Y

Attendee	Organisation	Email	15/03 /04	23/03 /04	02/04 /04	28/04 /04	28/05 /04	18/06 /04	28/06 /04	12/07 /04	13/08 /04	27/08 /04
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ANNEX 2 SERIALS

SP01 and SP02

There is currently a charge associated with these Serials which look at the timeliness of Performance Assurance Reporting and Monitoring System (PARMS) data provision. The Group considered that it was important to incentivise Suppliers to provide data in a timely manner; therefore they agreed that these Serials should have Supplier Charges attached.

SP04

This Serial is concerned with the timely installation of mandatory Half Hourly (HH) metering. The Group felt that it was important that Suppliers install HH metering for all sites/Premises³ over 100KW, therefore this Serial was also deemed by the Group to be appropriate for Supplier Charges.

SP08a, b and c

This Serial is concerned with the provision of accurate data based on AAs/Actuals into Settlements. Under SP08a, the Group felt that Suppliers ought to be charged if they fail to provide Annualised Advances (AAs) for 97% of Non Half Hourly (NHH) meters at Final Reconciliation (RF). SP08b is a charge applied to Suppliers who fail to provide actuals for 99% of HH meters above 100kW at the First Reconciliation Run (R1) – this Serial is for compulsory HH metering (MIST⁴). Finally SP08c is a charge applied to Suppliers who fail to provide actuals for 99% of HH meters below 100kW at RF – this Serial is for non compulsory HH metering (MOST⁵). The Group considered SP08a, b and c and deemed them appropriate to have Supplier Charges attached under P157.

Please note: Charges should continue to be applied to importing meters only on the basis that estimations of export are either zero or profiled using strict techniques.

ANNEX 3 SUMMARY OF LOSS AND COMPARISON WITH CURRENT SUPPLIER CHARGES

Note: SP08b and c the same data is used.

(For SP08a there used to be a charge at R3 and RF. P157 removes the R3 charge. For SP08b there used to be a charge at SF and R1. P157 removes the SF charge. – See table below)

£/MWh	SP08a	SP08b	SP08c
Value of volume of energy assumed to be uncertain 1)	£0.11	£3.21	£3.21
Incremental Central Costs	£0.002	£0.001	£0.001
In house Supplier costs to correct bad data	£0.09		
Total P157 Supplier Charges	£0.202 RF	£3.211 RF	£3.211 RF
Current Supplier Charges	£0.14R3	£0.14SF	
Current Supplier Charges	£1.57RF	£1.57R1	£1.57RF

£ per day	SP04
Difference between profile and actual P157 Supplier Charge	£1.66
Current Supplier Charges	£2.95

³ This will change if P124 is approved by the Authority but will not affect the Supplier Charges under P157.

⁴ MIST = Metering Inside Settlement Timescales

⁵ MOST = Metering Outside Settlement Timescales

£ per day	SP01	SP02	
Administration Costs P157 Supplier Charge	£20	£20	Per day only
Current Supplier Charges	£28.03	£28.03	Per GSP Group per day