

ASSESSMENT REPORT for Modification Proposal P141 Removal of Unintentional Effects of Approved Modification P106 on Supplier Charges

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 BSC Panel to;

- **AGREE that the Proposed P141 should be made;**
- **AGREE a provisional Implementation Date for the Proposed Modification P141 that is backdated to 24 June 2003;**
- **AGREE that Modification Proposal P141 be submitted to the Report Phase; and**
- **AGREE that the draft Modification Report be issued for consultation and submitted to the Panel Meeting of November 13 2003.**

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¹ The current version of the Balancing and Settlement Code (the 'Code') can be found at www.elexon.co.uk/ta/bsc/el_docs/bsc_code.html

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SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

As far as BSCCo has been able to assess the following parties/documents have been identified as being potentially impacted by Modification Proposal P141.

Parties	Sections of the BSC	Code Subsidiary Documents
Suppliers <input checked="" type="checkbox"/>	A <input type="checkbox"/>	BSC Procedures <input type="checkbox"/>
Generators <input checked="" type="checkbox"/>	B <input type="checkbox"/>	Codes of Practice <input type="checkbox"/>
Licence Exemptable Generators <input 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 <input 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 Aggregators <input checked="" type="checkbox"/>	G <input type="checkbox"/>	Reporting Catalogue <input type="checkbox"/>
Data Collectors <input checked="" type="checkbox"/>	H <input type="checkbox"/>	MIDS <input type="checkbox"/>
Meter Operator Agents <input checked="" 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 <input type="checkbox"/>
Certification Agent <input type="checkbox"/>	X <input type="checkbox"/>	Other Documents
MIDP <input type="checkbox"/>		Transmission Licence <input type="checkbox"/>
TFLA <input type="checkbox"/>		
Other Agents		
SMRA <input checked="" type="checkbox"/>		
Data Transmission Provider <input type="checkbox"/>		

X = Identified in Report for last Procedure
N = Newly identified in this Report

Estimated cost for progressing P141 through Modification Procedures	£ 0 + 32 ELEXON man days
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1 DESCRIPTION OF PROPOSED MODIFICATION AND ASSESSMENT AGAINST THE APPLICABLE BSC OBJECTIVES

1.1 Modification Proposal

Modification Proposal P141 "Removal of Unintentional Effects of Approved Modification P106 on Supplier Charges" (P141) was raised by EDF Energy on 28 August 2003. P141 seeks to ensure that the process by which Serials and Standards are reported and monitored, and Supplier Charges levied, remains on the basis of Supplier IDs rather than on a Supplier basis which is claimed to have been brought about by an unintentional side effect of the implementation of P106 "Amendment to the BSC to allow multiple Supplier IDs" (P106). In order to give full effect to P141, i.e. to remove completely the effect of P106 on how Serials and Supplier Charges are dealt with, it is necessary to backdate the implementation of the P141 to 24 June 2003. This will prevent systems having to be developed to cope with the P106 rules for a limited period. The Proposer believes that P141 will better facilitate the achievement of Applicable BSC Objective (d), efficiency in the implementation and administration of the balancing and settlement arrangements, by ensuring that provision and reporting of data is carried out in a consistent manner and hence avoid unintended changes and the associated costs.

The VASMG met to discuss P141 on 18 September 2003 and a consultation document was issued on the 19 September 2003 with responses requested by 26 September 2003. 7 responses were received. These were discussed at the VASMG meeting on 30 September 2003.

1.2 Proposed Modification

P141 proposes to amend the Code such that Serials and Supplier Charges continue to be dealt with at a Supplier ID level and not at a Supplier level which has been brought about by a side effect of the implementation of P106.

1.3 Issues raised by the Proposed Modification

An initial assessment of P141 identified the following potential areas of impact and issues which needed to be considered and addressed in progressing Modification Proposal P141:

- the need to consult Parties as to whether the change to Serials and Supplier Charges was an expected outcome of P106 and whether they have taken steps to implement this change;
- whether P141 should be backdated to 24 June 2003 or whether an Alternative Modification purely prospective in nature should be adopted.

In order to fully remove the effect of P106 on Serials and Supplier Charges, P141 implementation date would need to coincide with that for P106 i.e. be backdated to 24 June 2003. There is the potential for the development by the VASMG of an Alternative Modification which is purely prospective in nature. In this situation, there would be an issue as to how to cope with Serials and Supplier Charges for the period between the P106 and P141 Implementation Dates;

- consequences of P141 not being implemented. If P141 is rejected then the inadvertent effects of P106 will require full implementation, namely the change in the process by which Serials and Standards are reported and monitored, and Supplier Charges levied, from being on the basis of Supplier IDs to being on a Supplier basis;
 - the existing PARMs is not robust enough to support the requirements of P106, therefore a new PARMs will be required to deal with data from 24 June 2003. How this is developed and the associated cost depends on several circumstances:

- P99 also requires a new PARMS system be developed – this would require an increase in scope to include the Serials that existed pre-P99 for use between 24 June 2003 and 1 May 2004 (P99 implementation date). In the meantime the existing PARMS would be used for the period up to 24 June 2003;
- if P143 is approved, there will not be a new PARMS system for P99 Serials. A new system will still be required for P106. The cost of this is likely to be of the order of the proposed P99 system; and
- if the VASMG, subsequent to their consideration of Supplier Charges, decide to simplify them, and a Modification raised to effect this subsequently approved, a new system will still be required for P106 to calculate charges from 24 June 2003 until the Implementation Date of the Modification arising from the VASMG discussions.

In all of these situations it is possible that a subsequent Modification would still be required to fully define how to apply the Supplier Charges cap as the implementation of P106 was part way through a PARMS reporting month. In addition, until the new system to accommodate the P106 rules is developed, no monitoring of Serials or validation of submitted data can occur. This may result in Serial 10² charges being incurred by Parties. Additionally if a validation failure occurs Parties will not be aware of this for a considerable amount of time and may have to resubmit the correct data at a later date.

- Party Agents may not know the Party ID that corresponds to the particular Supplier ID and thus may be unable to comply with the new rules. Ways of dealing with this could be developed, however no change is currently planned.

1.4 Assessment of how the Proposed Modification will better facilitate the Applicable BSC Objectives

A majority of the VASMG, agreed that Proposed Modification P141 better facilitated Applicable BSC Objective (d) in that removal of an unintentional side effect would better facilitate the implementation and administration of the balancing and settlement arrangements. A minority view held by one member of the Group was that P141 did not better facilitate the achievement of the Applicable BSC Objectives. This is because the member believes that P141 leaves a major problem regarding the interpretation and application of Serials, Standards and Supplier Charges prior to the P106 Implementation Date. The same member also considered that P141 may detract from Applicable BSC Objective (c) since it would set Standards separately in relation to parts of certain Suppliers' demand in a GSP Group, which would act as an additional requirement / constraint on their performance / actions.

1.5 Modification Group's cost benefit analysis of Proposed Modification

In assessing the Proposed Modification P141, the Modification Group believed that the Proposed Modification P141 would decrease the costs to the industry by a considerable amount as if P141 is rejected, a new PARMS system will have to be developed to support the change in reporting to be on a Supplier rather than a Supplier ID basis as has been performed historically and / or changes to Supplier and Party Agent Systems. A majority of the VASMG considered that the benefits from P141 could only be achieved with an Implementation Date backdated to 24 June 2003.

² Serial 10 places an obligation on Suppliers to arrange the delivery of Routine Performance Monitoring Reports to the Performance Assurance Board, by not later than 20 Business Days after the end of each month. This obligation is replaced on 1 May 2003 by Serial SP01.

1.6 Governance and regulatory framework assessment

During the assessment of the Proposed Modification, the VASMG also considered the wider implications of P141 in the context of the statutory, regulatory and contractual framework within which the Code sits, as is required by the Code (Annex F-1, paragraph 1(g)). The VASMG was of the opinion that, were P141 to be implemented, there would be no such wider implications.

2 RATIONALE FOR MODIFICATION GROUP'S RECOMMENDATIONS TO THE PANEL

A majority of the VASMG recommended that the Panel should recommend approval of P141 since it better facilitates Applicable BSC Objective (d). This is because P141 aims to ensure that the process by which Serials and Standards are reported and monitored, and Supplier Charges levied, remains on the basis of Supplier IDs rather than on a Supplier basis (which has been brought about by an unintentional side effect of the implementation of P106).

A majority of the VASMG support an Implementation Date backdated to 24 June 2003. This in its opinion would be the only practicable Implementation Date with which the defect outlined in the Modification Proposal could be resolved, since the claimed unintended effects of P106 could only be fully removed by using the same Implementation Date for P141 as for P106.

They recommend that P141 progresses to Report Phase with the Modification Report being presented to the Panel at its meeting on 13 November 2003.

The VASMG considered whether there was a possible Alternative Modification P141 that better facilitated the Applicable BSC Objectives relative to the Proposed Modification. There was minority support for an Alternative Modification (see Section 5.2 below) but a majority of the VASMG decided not to progress it.

3 IMPACT ON BSC SYSTEMS AND PARTIES

An assessment has been undertaken in respect of BSC Systems and Parties and the following have been identified as potentially being impacted by the Proposed Modification.

3.1 BSCCo

An initial assessment was undertaken in respect of the potential impacts on BSCCo. Due to the fact that the impact on Supplier Charges was seen as an unintended outcome of P106, no changes to systems and processes have been made in support of P106. As stated previously, were P141 to be rejected there would be significant impact on BSCCo. The existing PARMS is fragile and cannot be amended therefore a new PARMS will be required to deal with data from 24 June 2003. How this is developed and the associated cost depends on several circumstances (see Section 1.3 above).

3.2 BSC Systems

An initial assessment was undertaken in respect of the potential impact on BSC Systems and processes. Due to the fact that it is believed that the impact on Serials, Standards and Supplier Charges was an unintended outcome of P106, no changes to systems and processes related to these were made in support of P106.

3.3 Parties and Party Agents

An initial assessment was undertaken in respect of the potential impact on systems and processes used by Parties and Party Agents. Since Parties have not changed any of their data provision or reporting

systems to align with the required changes to Code Subsidiary Documents as a consequence of the P106 legal text pertaining to Supplier Charges, there should be no impact. As stated previously, were P141 to be rejected there would be an impact on Supplier and Party Agent systems and processes since consequential changes to the BSCPs and other documents would be required to comply with P106 – hence Parties would have to report at a Supplier level rather than a Supplier ID level. In addition since PARMS processing is still some months prior to June 2003 no effort is being undone by retrospective implementation.

4 IMPACT ON CODE AND DOCUMENTATION

4.1 Balancing and Settlement Code

An initial assessment has been undertaken in respect of all Sections of the Code and the following Sections have been identified as potentially being impacted by the Modification Proposal.

Section	Potential Impact of Proposed Modification
S.1.3.4	Contains provisions that Supplier ID will apply to – Supplier Charges and Serials should be added to this list.

4.2 Code Subsidiary Documents

An initial assessment has been undertaken in respect of all the potential impacts on Code Subsidiary Documents. Due to the fact that the impact on Supplier Charges was not an identified outcome of P106, no changes to systems and processes have been made in support of P106. As stated previously, were P141 to be rejected there would be significant impact on Code Subsidiary Documents – if aggregation from Supplier ID level to Supplier level could not be carried out at the input stage - BSCP533 and BSCP536 would need to be altered to reflect the change in the data provision and reporting rules.

4.3 Impact on Core Industry Documents and supporting arrangements

An initial assessment has been undertaken in respect of Core Industry Documents and no impact has been identified.

5 SUMMARY OF CONSULTATIONS

Consultation question	Respondent agrees	Respondent disagrees	Opinion unexpressed
Do you believe Proposed Modification P141 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	5	1	1
When the P106 legal text was assessed by your organisation did you consider that the way in which you submitted data as regards Serials and Standards and Supplier Charges would be changed? Please give rationale	1	6	0
Have you taken any material action to implement reporting of serials on a Supplier rather than a Supplier ID basis?	0	7	0
Do you agree with an Implementation date for P141 that is backdated to 24 June 2003? Please give rationale	6	1	0

Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered to address the defect identified within P141? Please give rationale	2	5	0
Does P141 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	1	6	0
Are there any further comments on P141 that you wish to make?	1	6	0

5.1 Modification Group's summary of the consultation responses

A majority, five, respondents, believed that P141 better facilitated the Applicable BSC Objectives (d) since there was an unintentional effect arising from P106 which would have detrimental effects if left unchanged and one respondent made no comment. One respondent did not believe that P141 better facilitated the achievement of the Applicable BSC Objectives. This respondent felt that P141 is inconsistent with Applicable BSC Objective (d) because it creates uncertainty as to the correct interpretation of Serials and Supplier Charges prior to P106 Implementation Date and also because of its retrospective impact on the obligations of Suppliers with multiple Supplier IDs. In addition this respondent considered that it could be argued that P141 was inconsistent with Applicable BSC Objective (c) (and could be seen as discriminatory), because it would set Standards separately in relation to parts of certain Suppliers' demand in a GSP Group, which would act as an additional requirement / constraint on their performance/actions.

A majority, six, of respondents did not anticipate that they would change the data they should have submitted with regards to Serials, Standards and Supplier Charges upon P106 implementation, and none of the respondents had taken material action to implement any changes. A further respondent considered whether there was a change required and determined not to make any system changes. Additional comments were made by respondents regarding this issue. One response stated a preference for Supplier ID reporting as, although suppliers are owned by one company, operationally they are still run 'as separate entities'. Three respondents, two in support of P141, do not believe that P106 changes the basis on which Serials data should be submitted. Two respondents stated that this is because details about Serials and Standard reporting are contained within a Balancing and Settlement Code Procedure (BSCP) as referred to in Annex S-1 of the Code. They do however recognise that P106 changes the basis on which Supplier Charges are calculated centrally by ELEXON, and this should be addressed by P141.

A majority, six respondents, agreed that an Implementation Date, backdated to 24 June 2003 was appropriate. This was because it seemed that there was little point to P141 were it not backdated, a prospective solution would not resolve the issue and the claimed unintended effects of P106 would have to be implemented for the interim period. One of these respondents stated that usually it was reluctant to implement retrospective Modification Proposals. Another of these stated that although it did not agree with P141 this Implementation Date was the least bad date. One respondent did not agree with the Implementation Date as it did not support retrospective changes and there has been no impact to date of the perceived inconsistency.

A majority, five respondents, did not feel that an Alternative Modification existed. Two respondents did support an Alternative Modification being developed. One respondent wanted to apply Annex S-1 on a Supplier ID basis and disapply Supplier Charges for the period between Go-Live and the P106 Implementation Date. The other respondent believed that P141 could be implemented on a purely prospective basis since there has been no impact to date of the perceived inconsistency.

There were other issues and comments brought up by respondents in the consultation. These are as follows:

- a request for additional consideration of the retrospective vs. prospective issue as regards the Implementation Date;
- whether it was fair to say that it had been agreed that the effect of P106 on Standards, Serials and Supplier Charges was unintentional. [A key question is whether there was in fact an “effect” at all, if “Supplier” in Annex S-1 is interpreted in strict accordance with the Annex X-1 definition prior to implementation of P106, i.e. “a Party which holds a Supply Licence and is responsible for Exports and/or Imports for which such Party is required, by virtue of Section K, to register one or more SVA Metering Systems”. If there was no “effect”, then it is more a question of whether there was an “unintentional non-effect”.);
- the fact that ELEXON whilst identifying an effect on Annex S-1 and PARMs in the P106 Initial Written Assessment, did not highlight this to the P106 Modification Group, consultees and the Panel, who were therefore unable to form a view on the issues;
- raising concerns about ELEXON's role in the Modification process, which may need to be addressed by the Governance Standing Modification Group. It is claimed that there were a number of matters which are stated or implied as having been agreed by the Modification Group, on which there was in fact a differing minority opinion, which is not reported. It was stated that there are a number of statements within the consultation document which were not recognised as being from the discussion of the VASMG;
- Inaccuracy of the statement in the first paragraph under “Backdated Implementation Date” that “The VASMG decided that the Implementation Date for P141 should be backdated to the 24 June 2003 ...” – it is stated that the VASMG does not have the power to “decide” this.

5.2 Comments and views of the Modification Group

The VASMG discussed the issues raised in the Initial Written Assessment as well as those brought up in consultation responses in their meetings on the 18th and 30th September 2003.

Applicable BSC Objectives

A majority of the VASMG, after consideration of the consultation responses, agreed that P141 better facilitated Applicable BSC Objective (d) in that removal of an unintentional side effect would better facilitate the implementation and administration of the balancing and settlement arrangements. One member of the Group believed that P141 did not better facilitate the Applicable BSC Objectives. This is because the member believes that P141 leaves a major problem regarding the interpretation and application of Serials, Standards and Supplier Charges prior to the P106 Implementation Date. In addition the same member considered that P141 may detract from Applicable BSC Objective (c) since it would set Standards separately in relation to parts of certain Suppliers' demand in a GSP Group, which would act as an additional requirement / constraint on their performance / actions.

Backdated Implementation Date/Alternative Modifications

The VASMG agreed that the Implementation Date for P141 should be backdated to the 24 June 2003 as a pragmatic solution to fully undo the claimed unintended effects of P106 and require reporting and monitoring of Serials, Standards and the application of Supplier Charges to be performed at a Supplier ID level. This in its opinion would be the only practicable Implementation Date with which the defect outlined in the Modification Proposal could be resolved, since the claimed unintended effects of P106 could only be fully removed by using the same Implementation Date for P141 as for P106.

A majority of the VASMG did not think an Alternative Modification which was purely prospective should be developed since this would not better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification. In particular this solution would not completely resolve the issue of the claimed unintended effects of P106, as it would mean that reporting at a Supplier level would have to be implemented for the interim period.

A minority of the Group, however, considered that the defect outlined in the Modification Proposal could be solved by making P141 purely prospective. Furthermore if a purely prospective change was made to Supplier Charges for the period between P106 implementation and P141 implementation would need to be suspended (this implies a degree of retrospection). The majority of the Modification Group did not agree with this suggestion and therefore an Alternative Modification along these lines was not developed.

One member of the VASMG suggested backdating the Implementation Date to Go-Live as there is a presumption in P141 that it is trying to solve a problem caused by P106 but that really the problem existed prior to P106. The VASMG agreed that the potential existence of an uncertainty regarding Serials prior to P106 Implementation Date should be recognised but is outside the scope of P141. The VASMG agreed that this was outside the scope of P141 since it was significantly wider in scope than the defect identified in P141 but agreed that there may potentially be a larger issue that could be raised outside the P141 procedure. A presentation by ELEXON to the Panel prior to the raising of this Modification Proposal had highlighted this issue. The Code was not clear, but there is some historical evidence of how the industry interpreted the Code at that time and based on this evidence ELEXON has taken a pragmatic view that levying charges at the supplier ID level was acceptable.

The VASMG requested that the Authority's decision letters be mentioned in the consultation document. The Authority in several of its decision letters has indicated that, in general, retrospective changes to the Balancing and Settlement Code (the Code) would damage market confidence in, and the efficient operation of, NETA. The Authority stated that there are generally accepted and well understood legal reasons why retrospective Modification Proposals should be avoided but accepted that there may be a number of particular circumstances that could give rise to the need for a retrospective rule change, including:

- a situation where the fault or error occasioning the loss was directly attributable to central arrangements;
- combinations of circumstances that could not have been reasonably foreseen; or
- where the possibility of retrospective action had been clearly flagged to participants in advance and only the details and process were decided retrospectively.
- It further stated that for a retrospective change to be justified, the loss sustained would need to be material.

The VASMG believed that rejecting P141 and hence implementing P106 would have a material effect and this effect was outlined in the consultation document.

It was noted in discussion by the VASMG that any practical solution to the problem identified in P141 could not avoid being retrospective in some respect.

Other issues identified in consultation responses

Several other issues were identified in the consultation responses and these were mentioned and addressed at the Modification Group meeting

A respondent questioned whether it was fair to say that it had been agreed that the effect of P106 on Standards, Serials and Supplier Charges was unintentional. The Group considered that since the issue had not been consulted on as part of the P106 process, nor the associated Code Subsidiary Documents

and systems changed as a consequence, the fact that post-P106 Supplier Charges ought to have been calculated on a Supplier basis was not envisaged. This is regardless of how you view the pre-P106 situation.

In addition a respondent mentioned the fact that ELEXON whilst identifying a potential effect on Annex S-1 and PARMs in the P106 Initial Written Assessment, did not highlight this to the P106 Modification Group, consultees and the Panel, who had therefore been unable to form an informed view on the issues. This was identified as the cause of the problem that led to P141 being raised but there is little that can be done about it at this juncture.

Concerns were raised by one respondent regarding ELEXON's role in the Modification process, and there was a suggestion that these may need to be addressed by the Governance Standing Modification Group. It is claimed that there were a number of matters which are stated or implied as having been agreed by the Modification Group, on which there was in fact a differing minority opinion, which is not reported. It was also stated that there are a number of statements within the consultation document which were not recognised as being from the discussion of the VASMG. This issue was considered by the VASMG and a majority did not support this viewpoint. One VASMG member felt that it would have been beneficial to circulate the consultation document to the VASMG before it was issued to industry – thereby avoiding this issue. This was discussed initially and the VASMG had agreed that time constraints made this impossible. The Group member who was concerned in this way said that although this was a complaint regarding the treatment of P141 it should be noted that they were not going to make a fuss about it.

There was a question as to the accuracy of the statement in the consultation document that “The VASMG decided that the Implementation Date for P141 should be backdated to the 24 June 2003 ...” – it is stated that the VASMG does not have the power to “decide” this. The sentence should have stated that “the VASMG provisionally agreed to recommend to the Panel that P141 should be backdated to the 24 June 2003”.

6 SUMMARY OF TRANSMISSION COMPANY ANALYSIS

6.1 Analysis

No impact on the Transmission Company's ability to discharge its obligations was identified. In addition the Transmission Company stated support for the rationale outlined in the Assessment Consultation document that P141 meets Applicable BSC Objective (d) by ensuring that the provision and reporting of data is carried out in a consistent manner and avoids unnecessary costs being incurred as a result of unintended changes. There has been no impact on Transmission Company computer systems and processes, as well as no costs identified associated with the Proposed Modification. There will be no change to any Core industry Documents.

Full Transmission Company analysis at annex 4.

6.2 Comments and views of the Modification Group

7 IMPLEMENTATION APPROACH

If P141 is approved there will be no changes to the systems and thus an implementation approach is not given here.

8 DOCUMENT CONTROL

8.1 Authorities

Version	Date	Author	Reviewer	Change Reference
0.1	30/09/03	Dena Harris	Change Delivery	
1.0	02/10/03	Dena Harris	Change Delivery	

8.2 References

Ref	Document	Owner	Issue date	Version
P106MR10	P106 "Amendment to the BSC to allow multiple Supplier IDs" Modification Report	ELEXON	14/03/03	1.0

5.	Innogy/Npower	P141_ASS_005	9	0
6.	Powergen	P141_ASS_006	15	0
7.	Centrica	P141_ASS_007	1	0



P141_ASS_001 – EDF Energy

Respondent:	Paul Chesterman
No. of BSC Parties Represented	9
BSC 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; London Energy plc; Seaboard Energy Limited
No. of Non BSC Parties Represented	
Non BSC Parties represented	
Role of Respondent	Supplier / Generator / Party Agent / Distribution Business

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P141 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	
2.	When the P106 legal text was assessed by your organisation did you consider that the way in which you submitted data as regards Serials and Standards and Supplier Charges would be changed? Please give rationale	yes	Yes we did think about it, but thankfully no material action has yet been taken.
3.	Have you taken any material action to implement reporting of serials on a Supplier rather than a Supplier ID basis?	No	
4.	Do you agree with an Implementation date for P141 that is backdated to 24 June 2003? Please give rationale	Yes	It was never intended that Serials and Standards would be reported on a Supplier basis, so it would be very sensible to remove completely the effect of P106 on Serials and Supplier Charges.

Q	Question	Response	Rationale
5.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered to address the defect identified within P141? Please give rationale	No	
6.	Does P141 raise any issues that you believe have not been identified so far and that should be progressed as pare of the Assessment Procedure? Please give rationale	No	
7.	Are there any further comments on P141 that you wish to make?	No	

P141_ASS_002 – Aquila Networks

Respondent:	Rachael Gardener
No. of BSC Parties Represented	
BSC Parties Represented	Aquila Networks Plc
No. of Non BSC Parties Represented	
Non BSC Parties represented	
Role of Respondent	

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P141 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes / No	No comment
2.	When the P106 legal text was assessed by your organisation did you consider that the way in which you submitted data as regards Serials and Standards and Supplier Charges would be changed? Please give rationale	No	Aquila Networks Plc continued to submit data on a supplier ID basis. In many cases, although suppliers are owned by one company, operationally, they are still run 'as separate entities' and reporting by supplier ID better facilitated this.
3.	Have you taken any material action to implement reporting of serials on a Supplier rather than a Supplier ID basis?	No	
4.	Do you agree with an Implementation date for P141 that is backdated to 24 June 2003? Please give rationale	Yes	Aquila Networks Plc have no reason to reject this date, as we already operating to the standard proposed by P141
5.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered to address the defect identified within P141? Please give rationale	No	

Q	Question	Response	Rationale
6.	Does P141 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
7.	Are there any further comments on P141 that you wish to make?	No	

P141_ASS_003 – Scottish Power

Respondent:	Name John W Russell (SAIC Ltd)
No. of BSC Parties Represented	6
BSC Parties Represented	<i>Please list all BSC Parties responding on behalf of (including the respondent company if relevant).</i> Scottish Power UK plc; ScottishPower Energy Management Ltd.; ScottishPower Generation Ltd; ScottishPower Energy Retail Ltd.; SP Transmission Ltd; SP Manweb plc.
No. of Non BSC Parties Represented	
Non BSC Parties represented	<i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P141 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	<i>Qualified Yes - ScottishPower agrees with the mod proposer that P141 has been raised in order to address an error in the P106 implementation. The interpretation of the BSC prior to P106 was that Supplier Charges should be applied at a Supplier Id level, and therefore to make changes to this would result in requirements to implement system changes that were not envisaged as part of P106. There is no evidence to suggest that Supplier level Supplier Charges are any more efficient or desirable than Supplier Id level charges, and since this was not the intention of P106, rejecting P141 would be against Applicable BSC Objective (D). We therefore believe that P141 better facilitates Applicable BSC Objective (D), however, we would qualify this with the proviso that the P141 implementation date can be backdated to the P106 implementation date (refer to question 4).</i>

Q	Question	Response	Rationale
2.	When the P106 legal text was assessed by your organisation did you consider that the way in which you submitted data as regards Serials and Standards and Supplier Charges would be changed? Please give rationale	No	<i>ScottishPower does not believe that P106 changes the basis on which Serials data should be submitted. The BSC does not explicitly state whether data should be provided at a Supplier Id or Supplier level; this is contained within BSCP533 and the MIRT which does require data to be provided at a Supplier Id level. However, ScottishPower does recognise that P106 changes the basis on which Supplier Charges are calculated centrally by ELEXON, and this is the unintentional error that should be addressed by P141.</i>
3.	Have you taken any material action to implement reporting of serials on a Supplier rather than a Supplier ID basis?	No	<i>Refer to comments in question 2. - ScottishPower does not believe that P106 (even with the unintentional error) requires Suppliers to make changes to their systems.</i>
4.	Do you agree with an Implementation date for P141 that is backdated to 24 June 2003? Please give rationale	Yes	<i>P106 should not have introduced changes to the Supplier Charges framework. P141 should only be accepted if it can be backdated to avoid the situation where the Supplier Charges framework is required to change as a result of the unintentional error in P106, and then subsequently changed back when P141 is implemented. In the event that P141 cannot be backdated, it is questionable whether introducing P141 would improve efficiency of the BSC and therefore whether the Applicable BSC Objectives are better facilitated.</i>
5.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered to address the defect identified within P141? Please give rationale	No	
6.	Does P141 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
7.	Are there any further comments on P141 that you wish to make?	No	

P141_ASS_004 – Scottish and Southern

This response is sent on behalf of Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd. and SSE Energy Supply Ltd.

In relation to the seven questions listed in the Consultation Paper, contained within your note of 23rd September 2003 concerning Modification Proposals P141, we have the following comments to make:-

Q1 Do you believe Proposed Modification P141 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)

Yes. It is clear that there was an unintentional effect arising from the approval of Modification Proposal P106 and that leaving it unchanged would have a number of detrimental effects. Therefore we do believe that Modification Proposal P141 does better facilitates the achievement of the Applicable BSC Objectives.

Q2 When the P106 legal text was assessed by your organisation did you consider that the way in which you submitted data as regards Serials and Standards and Supplier Charges would be changed? Please give rationale

No

Q3 Have you taken any material action to implement reporting of serials on a Supplier rather than a Supplier ID basis?

No

Q4 Do you agree with an Implementation date for P141 that is backdated to 24 June 2003? Please give rationale

Yes. Whilst generally we are not supportive of retrospective changes to the Code it is clear that the approval of Modification Proposal P106 had a number of unintentional consequences that were not anticipated by the Modification Group, the Panel, the Authority and market participants in general. Backdating the implementation of Modification Proposal P141 will therefore be appropriate in these very limited, and hopefully unique, circumstances.

Q5 Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered to address the defect identified within P141? Please give rationale

No

Q6 Does P141 raise any issues that you believe have not been identified so far and that should be progressed as pare of the Assessment Procedure? Please give rationale

No

Q7 Are there any further comments on P141 that you wish to make?

Nothing further at this time.

Regards

Garth Graham
Scottish and Southern Energy plc

P141_ASS_005 – Innogy/Npower

Respondent:	<i>R Harrison, Npower Ltd</i>
No. of BSC Parties Represented	<i>9</i>
BSC Parties Represented	<i>Innogy plc, Innogy Cogen Limited, Innogy Cogen Trading Limited, Npower Limited, Npower Direct Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited and Npower Yorkshire Supply Limited</i>
No. of Non BSC Parties Represented	<i>none</i>
Non BSC Parties represented	<i>N/A</i>
Role of Respondent	<i>Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P141 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	We cannot see how it is consistent with Applicable Objective (d), since it unavoidably creates uncertainty about the correct interpretation and application of Serials and Supplier Charges prior to the P106 implementation date, bringing the risk of legal challenge, and also because of its retrospective impact on the obligations of Suppliers with multiple Supplier IDs. It could also be argued that it is inconsistent with Applicable Objective (c) (as well as the 'non-discrimination' objective in paragraph 1.2.1 (c) of Section B of the Code), because it would set standards separately in relation to parts of certain Suppliers' demand in a GSP Group, which would act as an additional requirement/constraint on their performance/actions. (This would be an additional burden on Suppliers integrating processes following acquisitions or following a Trade Sale or Supplier of Last Resort appointment.)
2.	When the P106 legal text was assessed by your organisation did you consider that the way in which you submitted data as regards Serials and Standards and Supplier Charges would be changed? Please give rationale	No	Paragraph 2.7.1 of Annex S-1 states that: "A Supplier shall deliver, or procure the delivery of, its Routine Performance Monitoring Report ... <u>in accordance with the relevant BSC Procedure, ...</u> " The relevant BSC Procedure is BSCP533, which incorporates the "PARMS Data Provider File Format – Suppliers" (Appendix 4.14). This indicates clearly that the data should be provided on the basis of Market Participant

Q	Question	Response	Rationale
			<p>Identifier (Supplier ID), which is a text field limited to 4 characters. (Presumably the same is the case for the reports from the SVAA, which are the basis of other Serials.)</p> <p>This BSC Procedure was not changed as part of (or in conjunction with) the implementation of P106, and no change to this was identified as part of Elexon's impact assessment on P106. Therefore, there was no reason for Suppliers with multiple Supplier Ids (or their Agents) – or any other Suppliers – to make or plan changes to their systems.</p> <p>We would acknowledge that, for some of the Serials, this means that the PARMS system may not be able to calculate the required outputs on a "Supplier" basis directly from this input, but we do not believe this to be a problem given appropriate pre-processing (at least for the Serials on which Supplier Charges are based), since "counts" are provided as well as percentages. This would appear to be a deficiency in the PARMS system (or the surrounding Elexon business process) rather than a defect in the Code or the Code Subsidiary Document or an issue of precedence requiring some Suppliers to submit data in a format other than that defined by the BSC Procedure.</p>
3.	Have you taken any material action to implement reporting of serials on a Supplier rather than a Supplier ID basis?	No	<p>This question should really be addressed to Elexon in respect of the PARMS process.</p> <p>For the reasons stated in response to question 2 above, we do not believe there was any identified impact on the obligations of Suppliers in respect of Performance Assurance reporting.</p>
4.	Do you agree with an Implementation date for P141 that is backdated to 24 June 2003? Please give rationale	Qualified Yes	<p>From a pragmatic point of view, we would agree with this as the least bad date for implementation of this or a suitable alternative Modification, since it minimises the impact on the PARMS process, the P99 PARMS specification and the retrospective impact on Serials and Supplier Charges. However, it does not resolve the issue re interpretation and application of these in respect of the period prior to P106 implementation.</p>

Q	Question	Response	Rationale
5.	<p>Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered to address the defect identified within P141?</p> <p>Please give rationale</p>	Yes	<p>A possible Alternative Modification would be to apply Annex S-1 on a Supplier ID basis (backdated to the P106 implementation date), but disapply Supplier Charges in respect of the period between the commencement of their application under NETA and P106 implementation, on the grounds that these are now seen to be unsound.</p> <p>There is a clear precedent for such disapplication in the waiving of outstanding Supplier Charges in respect of the Pooling & Settlement Agreement. However, there might be an issue about the treatment of Supplier Charges already levied and re-distributed under the Code.</p> <p>This Alternative Modification would arguably better facilitate Applicable Objective (d), since it will avoid the costs of administration and will reduce the risk of potentially costly challenge to Supplier Charges applied on an unsound basis in respect of the period prior to P106 implementation.</p> <p>Since it has been noted that Supplier Charges appear to have had little effect on performance to date, and in any case this is all in the past, the impact of this on the Performance Assurance Framework must surely be minimal.</p>
6.	<p>Does P141 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure?</p> <p>Please give rationale</p>	Yes	<p>It is stated in the Consultation document that "It has been agreed that this effect of P106 on Standards, Serials and Supplier Charges was unintentional ...". We would question who this has been agreed by and on whose part it was unintentional. Surely, the important opinions here are those of the P106 Modification Group and the Panel (as well as those who were consulted on P106). It appears that at least some of these parties have not been consulted prior to making this statement in this Consultation. They should be consulted on this.</p> <p>A key question is whether there was in fact an "effect" at all, if "Supplier" in Annex S-1 is interpreted in strict accordance with the Annex X-1 definition prior to implementation of P106, i.e. "a <u>Party</u> which holds a Supply Licence and is responsible for Exports and/or Imports for which such Party is required, by virtue of Section K, to register one or more SVA Metering Systems". If there was no "effect", then it is more a question of whether there was an "unintentional non-effect".</p>

Q	Question	Response	Rationale
			<p>Potential impacts on both Annex S-1 and PARMS were identified in Elexon's Initial Written Assessment (Panel Paper 52/016 attachment). However, the specific implications of Suppliers with multiple Supplier Ids for the PARMS system (and the business process surrounding it), as well as for the application of the Serials and Supplier Charges, were not identified to the P106 Modification Group, consultees and the Panel, who were therefore unable to form a view on the issues. Had these issues been drawn to the attention of the Modification Group, it is possible that a different view would have been taken on the interpretation of "Supplier" in Annex S-1 and that this would have resulted in different legal text. However, we cannot be certain of this or what the relevant legal text would have been.</p>

Q	Question	Response	Rationale
7.	Are there any further comments on P141 that you wish to make?	Yes / No	<p>It appears that this Consultation has suffered from the decision not to circulate it to the VASMG for comment/verification before formal issue. I would draw attention to the following points as examples:</p> <p>There are a number of matters which are stated or implied as having been agreed by the Modification Group, on which there was in fact a differing minority opinion, which is not reported.</p> <p>There are a number of statements (in section 3 "Modification Group discussion" in particular) which I do not recognise from the discussion of the VASMG, and which appear to be extracts from other documents or assertions of an opinion from Elexon. Given the apparent role of Elexon in the problem which P141 is seeking to address, we believe this raises serious questions about Elexon's role in the Modification process, which may need to be addressed by the Governance Standing Modification Group.</p> <p>There is a statement in the first paragraph under "Backdated Implementation Date" that "The VASMG decided that the Implementation Date for P141 should be backdated to the 24 June 2003 ..." – This is clearly inaccurate, since the VASMG does not have the power to "decide" this.</p> <p>I would observe that this is not the normal way in which Modification Group discussions have traditionally been reported in Assessment Consultation documents.</p>

P141_ASS_006 – Powergen

Respondent:	Afroze Miah
No. of BSC Parties Represented	8.2.1.1 15
BSC Parties Represented	8.2.1.2 Powergen UK plc, Powergen Retail Limited, Diamond Power Generation Limited, Cottam Development Centre Limited, TXU Europe Drakelow Limited, TXU Europe Ironbridge Limited, TXU Europe High Marnham Limited, Midlands Gas Limited, Western Gas Limited, TXU Europe (AHG) Limited, TXU Europe (AH Online) Limited, Citigen (London) Limited, Severn Trent Energy Limited (known as TXU Europe (AHST) Limited), TXU Europe (AHGD) Limited and Ownlabel Energy Limited
Role of Respondent	Supplier

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P141 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	This is a tidy up exercise for a possibly unintentional consequence of the implementation of P106. This modification seems to achieve the Applicable BSC Objective (d).
2.	When the P106 legal text was assessed by your organisation did you consider that the way in which you submitted data as regards Serials and Standards and Supplier Charges would be changed? Please give rationale	No	We believed then as we believe now that modification P106 would not change the way we would submit data related to Serials and Standards and the associated supplier charges. We expected to continue to send data on a Supplier ID basis and NOT on a Supplier basis. It would be business as usual as far as we were concerned.
3.	Have you taken any material action to implement reporting of serials on a Supplier rather than a Supplier ID basis?	No	See our comments under question 2) above.
4.	Do you agree with an Implementation date for P141 that is backdated to 24 June 2003? Please give rationale	No	We do not support retrospective changes. As the impact to date of this perceived inconsistency has been zero we do not see why P141 should retrospectively change this inconsistency to the date of implementation of P106.

Q	Question	Response	Rationale
5.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered to address the defect identified within P141? Please give rationale	Yes	The alternative solution would be to implement P141 without backdating it to the implementation of P106. See our response to question 4) above.
6.	Does P141 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	However, more consideration should be given to whether it is better to make retrospective or prospective changes as a result of implementing P141.
7.	Are there any further comments on P141 that you wish to make?	No	

P141_ASS_007 – Centrica

Respondent:	<i>Claire Walsh</i>
No. of BSC Parties Represented	
BSC Parties Represented	Centrica
No. of Non BSC Parties Represented	
Non BSC Parties represented	
Role of Respondent	<i>Supplier</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P141 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	P141 would remove the unintended effects of P106 and return the Code to Supplier Charges at Supplier id level, thereby facilitating efficiency in the implementation and administration of the code.
2.	When the P106 legal text was assessed by your organisation did you consider that the way in which you submitted data as regards Serials and Standards and Supplier Charges would be changed? Please give rationale	No	As the effect on SC's was excluded from the impact assessment within P106, we did not affect any changes to the provision of data and maintained the submission of SC's at Supplier Id level.
3.	Have you taken any material action to implement reporting of serials on a Supplier rather than a Supplier ID basis?	No	As per Q2.
4.	Do you agree with an Implementation date for P141 that is backdated to 24 June 2003? Please give rationale	Yes	This Modification must be implemented as a retrospective change as a preventative measure to mitigate the potential scenario whereby SC's need to resubmitted for the period post 24 th June at Party Level, and then resumed at Supplier Id level (should P141 be approved with an implementation date in the future). Should P141 not be approved as a retrospective MOD, the transparency and complexity with the submission, calculation, validation and redistribution of SC's would be negatively affected.

Q	Question	Response	Rationale
5.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered to address the defect identified within P141? Please give rationale	No	
6.	Does P141 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
7.	Are there any further comments on P141 that you wish to make?	No	

ANNEX 4 TRANSMISSION COMPANY ANALYSIS

In accordance with paragraph F 2.8 of the Code, please respond to the following questions concerning P141 (including the rationale for each response):

Q	Question	Response
1	Please outline any impact of the Proposed Modification (and, if applicable, any Alternative Modification) on the ability of the Transmission Company to discharge its obligations efficiently under the Transmission Licence and on its ability to operate an efficient, economical and co-ordinated transmission system.	No impact has been identified as a result of this modification proposal on the ability of the Transmission Company to discharge its obligations under the Transmission Licence.
2	Please outline the views and rationale of the Transmission Company as to whether the Proposed Modification (and, if applicable, any Alternative Modification) would better facilitate achievement of the Applicable BSC Objectives.	We support the rationale outlined in the Assessment Consultation that the proposed modification meets BSC Applicable Objective d) by ensuring that the provision and reporting of data is carried out in a consistent manner and avoids unnecessary

		costs being incurred as a result of unintended changes.
3	Please outline the impact of the Proposed Modification (and, if applicable, any Alternative Modification) on the computer systems and processes of the Transmission Company, including details of any changes to such systems and processes that would be required as a result of the implementation of the Proposed Modification (and, if applicable, any Alternative Modification)	No impact has been identified on the computer systems and processes of the Transmission Company resulting from this modification proposal.
4	Please provide an estimate of the development, capital and operating costs (broken down in reasonable detail) which the Transmission Company anticipates that it would incur in, and as a result of, implementing the Proposed Modification (and, if applicable, any Alternative Modification).	No costs have been identified.
5	Please provide details of any consequential changes to Core Industry Documents that would be required as a result of the implementation of the Proposed Modification (and, if applicable, any Alternative Modification).	No consequential changes have been identified.
6	Any other comments on the Proposed Modification (and Alternative Modification if applicable).	No further comments.

ANNEX 5 BSC AGENT IMPACT ASSESSMENTS

No BSC Agent Impact Assessments were commissioned.

ANNEX 6 PARTY IMPACT ASSESSMENTS

Organisation	Comments
Sue Macklin Scottish and Southern	What impact, if any, will the Proposed Modification have on your organisation? None Please indicate the cost of implementing the Proposed Modification and whether your

	<p>organisation has:</p> <p>begun implementation of reporting of Serials on a Supplier rather than a Supplier ID basis for P106; or</p> <p>not begun implementation. Not begun</p> <p>Please indicate whether you agree with the proposed Implementation Date for P141 (i.e. backdated to 24 June 2003): Yes</p> <p>Please indicate whether your organisation would need to resubmit data already submitted in respect of Settlement Days after 24 June 2003 at a Supplier level: No</p>
<p>Rachael Gardener Aquila Networks</p>	<p>Please find that there is no impact to Aquila Networks Plc systems and/or processes.</p>
<p>John Russell Scottish Power</p>	<p>What impact, if any, will the Proposed Modification have on your organisation?</p> <p>There will be no impact on ScottishPower.</p> <p>Please indicate the cost of implementing the Proposed Modification and whether your organisation has:</p> <p>begun implementation of reporting of Serials on a Supplier rather than a Supplier ID basis for P106; or</p> <p>not begun implementation.</p> <p>ScottishPower does not believe that P106 changes the basis on which Serials data should be submitted. The BSC does not explicitly state whether data should be provided at a Supplier Id or Supplier level; this is contained within BSCP533 and the MIRT which does require data to be provided at a Supplier Id level.</p> <p>Please indicate whether you agree with the proposed Implementation Date for P141 (i.e. backdated to 24 June 2003):</p> <p>Yes</p> <p>Rationale: P106 should not have introduced changes to the Supplier Charges</p>

	<p>framework. P141 should only be accepted if it can be backdated to avoid the situation where the Supplier Charges framework is required to change as a result of the unintentional error in P106, and then subsequently changed back when P141 is implemented. In the event that P141 cannot be backdated, it is questionable whether introducing P141 would improve efficiency of the BSC and therefore whether the Applicable BSC Objectives are better facilitated.</p> <p>Please indicate whether your organisation would need to resubmit data already submitted in respect of Settlement Days after 24 June 2003 at a Supplier level:</p> <p>No</p> <p>Rationale: ScottishPower does not believe there will be a requirement to resubmit data already submitted in respect of settlement days after 24 September 2003. ScottishPower has complied with the BSC obligations to submit "...reports to the PAB as may from time to time be required in accordance with the relevant BSC Procedures..." (Section S 3.1.1). These BSC Procedures (BSCP533 and the MIRT) require data to be submitted at a Supplier Id level. The unintentional effect of P106 was to require ELEXON to calculate Supplier Charges at a Supplier level, which has no impact on ScottishPower's PARMS submissions.</p> <p>Any other comments:</p> <p>We have no further comments</p>
<p>Clare Talbot NGC</p>	<p>What impact, if any, will the Proposed Modification have on your organisation?</p> <p>No impact identified.</p> <p>Please indicate the cost of implementing the Proposed Modification and whether your organisation has:</p> <ul style="list-style-type: none"> a) begun implementation of reporting of Serials on a Supplier rather than a Supplier ID basis for P106; or b) not begun implementation. <p>No impact identified.</p> <p>Please indicate whether you agree with the proposed Implementation Date for P141 (i.e. backdated to 24 June 2003):</p>

	<p style="text-align: center;">Neutral</p> <p>Please indicate whether your organisation would need to resubmit data already submitted in respect of Settlement Days after 24 June 2003 at a Supplier level: Not applicable.</p>
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ANNEX 7 COST BENEFIT ANALYSIS

No Cost Benefit Analysis was commissioned.

ANNEX 8 CORE INDUSTRY DOCUMENT OWNER IMPACT ASSESSMENTS

No Core industry Document Owner Impact Assessments were commissioned.

ANNEX 9 PROPOSED TEXT TO MODIFY BSCCO MEMORANDUM AND ARTICLES OF ASSOCIATION

There is no proposed text to modify BSCCo Memorandum and Articles of Association.

ANNEX 10 TERMS OF REFERENCE AND REPORT/ANALYSIS OF EXTERNAL CONSULTANTS/ADVISORS

No BSC Agent Impact Assessments were commissioned.