

June 2000

**Distribution Networks and NETA
A Consultation Paper**

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1. Introduction and Executive Summary

1.1 This document explains Ofgem's present thinking on the key issues relating to the interaction between distribution networks and the new electricity trading arrangements (NETA). It develops and expands on some of the material set out in the October 1999¹, December 1999² and April 2000³ NETA consultation and conclusions papers. The purpose of this consultation exercise is to identify issues and seek views on the most appropriate way forward.

1.2 A distribution constraint or failure can result in an embedded generator having to reduce output and or an interruption in supply to a customer. In these circumstances the generator and or the customer's supplier may incur imbalance charges under NETA. There are two sorts of issue to consider:

- whether the existing framework of incentives on distribution businesses, embedded generators and suppliers should be adjusted to take account of the revised attribution of imbalance costs that will result from the introduction of NETA; and
- whether there should be compensation payments for generators and suppliers incurring imbalance costs as a result of distribution constraints and failures and whether distribution charges to generators and suppliers should be increased to recover the costs of these payments.

1.3 There are a number of wider questions relating to the relationship between embedded generators and distribution businesses that are outside the scope of this consultation paper. For instance, a number of embedded generators have suggested that existing commercial arrangements do not reflect the benefits that embedded generation brings to a distribution network in terms of decreasing electrical losses, reducing the need for reinforcement investment and increasing security of supply. These issues will be considered by Ofgem following the report of the DTI and Ofgem working group on embedded generation issues, scheduled for Autumn 2000. It will also be necessary to take account of

¹ October 1999 Ofgem DTI Conclusions: New Electricity Trading Arrangements.

² December 1999 Ofgem Consultation: NGC SO Incentives, Transmission Access & Losses Under NETA.

³ April 2000 Ofgem Consultation: NGC SO under NETA, Transitional Arrangements.

Government policy on environmental matters and any initiatives following the report of the Royal Commission on Environmental Pollution.

- 1.4 Following consideration of the responses to this paper, discussions with interested parties and the report of the DTI and Ofgem working group on embedded generation draft proposals will be published in Autumn 2000.
- 1.5 It would be helpful to hear from all those with an interest in the issues raised in this paper, including customers, their representatives, embedded generators, suppliers and other interested groups as well as distribution businesses. Views are invited by 11 August 2000. Responses should be sent to:

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Responses will be published by placing them in the Ofgem library.

2. Background

Distribution Networks

- 2.1 There are 12 licensed distribution businesses in England and Wales. Each of these businesses owns and operates the distribution network in its authorised area. Most of the services provided by a distribution business, such as use of system, are not subject to competition and so Ofgem has put in place a price control on each company's distribution charges.
- 2.2 Each distribution system comprises overhead lines, cables, transformers, switch gear and other equipment to enable the transfer of electricity from the transmission system and generators connected directly to the distribution network (embedded generators) to customers' premises. Most customers are supplied at low voltage (LV), which is defined as a voltage less than 1kV, with domestic customers supplied at 230V. Business customers are sometimes supplied at high voltage (HV), which is defined as a voltage greater than 1kV.
- 2.3 At present distribution systems are largely passive networks transporting electricity from the transmission network and embedded generators to customers' premises. This contrasts with the transmission network which is an actively controlled system with NGC both managing transmission network assets and maintaining a national balance between demand and supply, primarily by instructing generators to modify output in line with fluctuations in demand.
- 2.4 The quality of service provided by each distribution network derives from the design of the network and the way it is operated, maintained and renewed. Key indicators of quality of service are the number and duration of any interruptions in network availability. Interruptions in network availability may result from network constraints or unplanned network failures, both of which may occur for a variety of reasons. For instance network maintenance may result in a line being out of service. If this limits the ability of the system to absorb embedded generation and a generator has to reduce output as a result of this then there is a network constraint. Adverse weather may cause a network failure resulting directly in a loss of network availability for customers or embedded generators. A network failure may also lead to a network constraint.

- 2.5 For an embedded generator the loss of network availability would mean that its station is either no longer able to generate energy for export (although it may be able to continue to meet any on site demand) or that it is only able to continue generating at a reduced output. For a customer the loss of network availability would mean an interruption in supply. On average interruptions in supply to customers are relatively short and infrequent, with a typical customer off supply for about 90 minutes each year, which equates to supply being available for about 99.98 per cent of the time. Nevertheless there is significant variation in the quality of service experienced by individual customers and embedded generators. To some extent this variation results from severe weather, when a relatively large number of customers can be without supply. Severe weather conditions have a particularly adverse impact on those customers and embedded generators located in rural areas and supplied via extensive networks of overhead distribution lines.
- 2.6 When an embedded generator reduces or stops generating as a result of an interruption in distribution network availability then the station will lose revenue as it will no longer be paid for its output. In addition to this there may be wider costs as the output of another, probably more expensive generator, will need to be increased in order to ensure demand and supply across the system remain in balance.
- 2.7 Each distribution business is required to design its network to certain minimum standards. The Electricity Supply Regulations, which are issued by the Secretary of State, place a duty on distribution businesses to ensure a continuous supply except in special circumstances and define limits for the allowed variation in the supply voltage. They also contain requirements about the safety and adequacy of distribution networks. There are licence conditions that require distribution businesses to meet network design standards known as Engineering Recommendation P2/5. This specifies different levels of security for different sizes of electrical demands. Each size of electrical demand may represent different numbers of customers. For example a 1 MW demand could be made up of a few hundred domestic customers or one large industrial customer. For large demands the network has to be designed to continue to provide electricity to customers after a single fault or failure of network equipment. For groups of

customers with demands below 1 MW supplies can be interrupted by a fault or failure and there is only a requirement to restore supplies following repair.

- 2.8 Further incentives to maintain the availability of supply to customers derive from the Guaranteed and Overall Standards of Performance set by Ofgem. Guaranteed Standards set service levels which must be met in each individual case. If a company fails to provide the level of service specified, it must make a fixed payment to the customer concerned. Overall Standards cover areas of service where it is not feasible or appropriate to give individual guarantees, but where it is reasonable for customers in general to expect a certain level of service. At present the incentives and information project (IIP) is examining options for strengthening the incentives on each distribution business to deliver an appropriate quality of service to its customers. It is the intention to introduce new output based incentive regimes from April 2002⁴.
- 2.9 The supplier of a customer experiencing an interruption in supply may also be affected, as the interruption may create a mismatch between its contracted generation purchases and supply. Under the existing trading arrangements and under NETA it is also possible that a supplier may be affected when an embedded generator experiences an interruption in distribution network availability. These matters are explained in more detail below.

Trading Arrangements and NETA

- 2.10 Under the existing trading arrangements the financial impact of an outage on an embedded generator caused by a distribution system constraint or failure will depend on whether the generator is subject to central dispatch, whether the output is sold through the electricity pool and its contractual position.
- 2.11 At present an embedded generator that is subject to central despatch will also sell its output through the electricity pool and pay transmission network use of system (TNUoS) generation charges. When a loss of distribution network availability causes such an embedded generator to reduce output then this is treated in broadly the same way as a constraint on a generator connected directly to the transmission system. The distribution business will notify NGC as

⁴ June 2000 Ofgem Initial Proposals: IIP Output Measures & Monitoring Delivery Between Reviews.

to which embedded generator is or will be subject to the loss of availability and NGC will, if necessary, instruct the embedded generator to reduce output. The embedded generator will receive constrained off payments as compensation. In addition the output of another (usually more expensive) generator will need to be increased in order to maintain the national balance between demand and supply. The costs of constraining plant on and off the system are met out of transport uplift, which is at present allocated across all suppliers by transmission service use of system (TSUoS) charges.

- 2.12 An embedded generator that is not centrally despatched may either sell its output through the electricity pool or via bilateral non-pooled arrangements. In either situation it will receive no compensation if a loss of distribution network availability causes a reduction in its output. However, such a generator would not be subject to TNUoS generation charges.
- 2.13 In the years immediately after privatisation distribution constraints led to a number of centrally despatched embedded generators being constrained off. However, between 1995/96 and 1998/99 no significant distribution constraint costs were incurred. NGC has said that this has been largely the result of better co-ordination between distribution businesses and embedded generators, resulting in fewer distribution system constraints.
- 2.14 Under NETA all licensed generators will be required to be parties to the Balancing and Settlement Code (BSC) that will incorporate rules for the balancing mechanism and settlement process. NGC, as system operator (SO), will purchase a variety of services in order to meet its licence and other obligations. These services can be summarised into two broad categories, energy balancing and system balancing. The April 2000 NETA consultation paper noted that the costs associated with energy imbalances should be, as far as possible, recovered from those parties out of balance.
- 2.15 In general, a generator that is under-contracted and so provides excess electricity to the system, potentially imposing balancing costs on the SO, will typically receive a relatively low price for this energy. A supplier that is under contracted will need to buy additional electricity, also potentially imposing balancing costs on the SO, will typically pay a relatively high price for this energy.

- 2.16 As explained in the December 1999 NETA consultation paper Ofgem is presently reviewing the existing arrangements for dealing with transmission constraints with the intention of introducing new arrangements from April 2001. The results of this review will be taken into account before finalising any proposals relating to distribution.
- 2.17 At present it is difficult to estimate the likely magnitude of the imbalance charges that will be incurred by licensed embedded generators. This is likely to remain the position until NETA has been established for some time.
- 2.18 Nevertheless, it is likely that licensed embedded generators will face extra costs arising from interruptions in distribution system availability, particularly as such interruptions are most likely during periods of severe winter weather when the system is more likely to be short of generation. While these costs have always existed, the increased transparency associated with the NETA arrangements allows for the quantification and attribution of these costs to all licensed generators. Chapter 3 discusses the incentives on embedded generators and distribution businesses and whether distribution charges should be modified to reflect the commercial arrangements that will be associated with NETA.
- 2.19 Under the existing trading arrangements the financial impact on a supplier of an outage caused by a distribution system constraint or failure will depend on the level of prices in the electricity pool and its contractual position. The supplier may also face other costs, including the costs associated with dealing with customers experiencing an interruption in supply.
- 2.20 At present a supplier typically receives revenue from customers depending on metered demand. An interruption in supply will result in the loss of this revenue. However, the supplier will save on the cost of making purchases from the electricity pool. The financial impact of the interruption will also depend on its contractual position. Many suppliers will have contracts for differences designed to protect them from pool price volatility. In general these contracts are for fixed volumes and establish a strike price for generation purchases. In these circumstances a supplier may have to continue to make payments to a generator despite a reduction in demand from its customers.

- 2.21 A supplier may also have a contract with a non-pooled embedded generator. If this generator is subject to a distribution constraint or failure the supplier may have to buy more electricity from the pool. It is likely that this will lead to higher costs for the supplier.
- 2.22 Under NETA all licensed suppliers will be required to be parties to the Balancing and Settlement Code (BSC) and as explained in paragraph 2.14 above the BSC incorporates rules for the balancing mechanism and settlement process. A supplier will receive imbalance payments if its demand is below its contracted level and have to make payments if its demand is in excess of its contracted level. A distribution failure will tend to cause a supplier to have demand below its contracted level. In these circumstances the payments made by the BSC are expected to be relatively low and so the savings to the supply business will also be relatively low, and may not off-set the reduction in revenues from its customers. This means suppliers can expect extra costs from a distribution interruption when compared to existing arrangements, which depend on the prices pertaining in the electricity pool or in contracts. Nevertheless, as with embedded generators, the magnitude of these possible extra costs will not become clear for some time.
- 2.23 A supplier may also have a contract with an unlicensed embedded generator that is not a signatory to the BSC. If this generator is subject to a distribution constraint or failure the supplier may have to make additional purchases via the balancing mechanism and so incur greater imbalance costs. This may affect the prices at which suppliers are prepared to purchase this energy and so directly on unlicensed embedded generators.
- 2.24 While these costs have always existed the increased transparency associated with the NETA arrangements allows for the more accurate quantification and attribution of these costs to suppliers. Chapter 3 discusses whether this revised attribution of costs merits consequential changes to the incentives faced by distribution businesses and whether distribution charges should be modified to reflect the commercial arrangements that will be associated with NETA.

3. The Incentives Framework

- 3.1 The primary objectives of the regulatory framework are to maintain and strengthen incentives on companies to increase efficiency, so that prices can be lowered, and to give clear incentives to encourage the delivery of an agreed quality of service. In the light of these considerations each distribution business should face incentives to minimise the overall costs of distribution services, provided that it has a reasonable degree of control over these costs, and that incentives to provide an agreed quality of service are maintained. Generators and suppliers should have incentives to minimise the costs over which they have a reasonable degree of control. These may include costs associated with trading imbalances as well as other sorts of economic loss.
- 3.2 The existing distribution price controls provide incentives for each distribution business to minimise its operating, capital and financing costs. As described in paragraph 2.7 and 2.8 above, there are arrangements that protect the quality of service each distribution business provides to its customers. There are also arrangements in place to provide incentives for each company to reduce electrical losses on its network. The costs of providing new connections to distribution networks are outside the scope of the existing price control, but may be determined by the Director General and are subject to competitive pressure. The Director General will continue to determine disputes on connection and use of system agreements in a way that is consistent with his statutory duties and functions.
- 3.3 When a failure on a distribution system occurs the distribution business concerned will usually have an incentive to rectify matters in a timely and cost effective way. These incentives are created by the operation of the Guaranteed Standards of Performance and the price control review process. The existing Guaranteed Standards provide for fixed compensation payments to customers experiencing prolonged interruptions in supply. In the periodic resetting of price controls Ofgem takes account of the quality of service in determining the appropriate level of revenue for each distribution business, with the overall balance between the level of prices and the quality of service being established with reference to the preferences of customers. As noted in paragraph 2.8 the

IIP is presently examining options for strengthening the incentives on each distribution business to deliver an appropriate quality of service to its customers.

- 3.4 There may be costs associated with an interruption in supply, such as financial or economic losses sustained by domestic or business customers, which are outside the control of the distribution business. In these circumstances it is appropriate to retain incentives on customers to minimise these costs and so compensation arrangements in the Guaranteed Standards provide for fixed payments rather than directly meeting the cost of economic loss. Nevertheless, if a customer believes that a distribution business has been negligent they may be able to seek redress through contract and or the general law.
- 3.5 In response to the April 2000 NETA consultation paper a number of distribution businesses noted that many distribution interruptions are caused by third party damage to their networks or severe weather. Given the existing planning standards they suggested that distribution businesses have only limited control over the number and duration of interruptions.
- 3.6 At present an embedded generator pays a connection charge in order to gain access to a distribution network. These are in the form of cash receipts intended to off-set the capital costs of connecting new stations to the network. The specification and location of each new connection, that is to some extent under the control of each embedded generator, will have an influence on the quality of supply experienced by that generator. It is clear that any changes to the existing commercial arrangements should not distort the incentives on embedded generators to connect to distribution networks at appropriate locations or distort their incentives to specify connection assets giving an appropriate security of supply.
- 3.7 The October 1999 NETA conclusions document noted that the proposed changes to trading arrangements would widen the commercial options available to small scale generators. For instance, such generators will be able to sell output through BSC signatories acting as aggregators on a national scale. By assigning the output of a number of generators to one imbalance account, aggregators will be able to reduce risk via diversification and offer commercial

hedging and arbitrage services. Therefore, generators and suppliers will have additional scope for managing imbalance costs.

- 3.8 These factors suggest that it will not be appropriate for distribution businesses to bear the direct costs of imbalances arising out of distribution constraints and failures. Nevertheless it is for consideration whether the existing incentives on distribution businesses are appropriate particularly in the light of changes to the attribution of imbalance costs that will result from the introduction of NETA.
- 3.9 As was noted in chapter 2 improvements in outage co-ordination between distribution businesses and embedded generators, made after privatisation, have significantly reduced the costs associated with distribution constraints. It is for consideration whether these arrangements could be further improved.
- 3.10 At present each distribution business is required to monitor the number, duration and cause of interruptions in supply experienced by its customers. It is for consideration whether these arrangements should be extended so that the number and duration of interruptions experienced by embedded generators is also monitored. This would allow this aspect of quality of service to be taken into account in the periodic resetting of the distribution price controls.
- 3.11 Two of the existing Overall Standards of Performance (1a and 1b) require companies to aim to restore supplies to specified minimum percentages of customers within specified periods (respectively 3 and 18 hours) after an interruption. The target restoration rate for Overall Standard 1b is presently 99.5 per cent. It is for consideration whether similar standards should be developed for embedded generators. If these standards are to be developed it would be important to take account of the wider issues identified in paragraph 1.3.
- 3.12 The Guaranteed Standard GS2 specifies that payments of £50 and £100 are available for domestic and non-domestic tariff customers respectively if the distribution business fails to restore supplies within 18 hours of an interruption. It is for consideration whether distribution businesses should be required to make fixed compensation payments to embedded generators and suppliers following interruptions in network availability, and how the level of any such payments should be determined. In making a decision on these matters it will be important to ensure that the costs of any new arrangements are proportionate

to the benefits and that incentives on embedded generators and suppliers for efficient operation are not distorted.

- 3.13 It is also for consideration whether distribution businesses should be encouraged or required to offer a risk hedging service to embedded generators and or suppliers. These arrangements might involve each distribution business offering enhanced compensation for interruptions in network availability to any embedded generator and or supplier willing to pay an appropriate insurance premium or additional use of system charge. In reaching a view on these matters it will be necessary to consider whether these services would be best provided for by distribution businesses or left to commercial providers of insurance products.
- 3.14 The April 2000 NETA consultation paper explained that it would be important for any changes to the existing regulatory framework to be consistent with the assumptions underlying the present distribution price control. Therefore, if proposals for any new Overall Standards of Performance or compensation payments implied an increase in distribution business costs then there would need to be new distribution charges for the embedded generators and suppliers benefiting from these revised arrangements. These charges could be treated as an excluded service under the existing price control arrangements. However it would be important to establish that this approach would provide adequate protection from the monopoly power of the distribution businesses.
- 3.15 As noted in chapter one there are a number wider questions relating to the relationship between embedded generators and distribution businesses that are outside the scope of this consultation paper. For instance, a number of embedded generators have suggested that existing commercial arrangements do not reflect the benefits that embedded generation brings to a distribution network in terms of decreasing electrical losses, reducing the need for reinforcement investment or increasing the security of supply. These issues will be considered by Ofgem following the report of the DTI and Ofgem working group on embedded generation issues, scheduled for Autumn 2000.

3.16 Views are invited on any aspect of the issues raised in this consultation paper and in particular on:

- whether uncertainties about the level of imbalance costs and other matters suggest that it would be more appropriate to delay consideration of these issues until better information is available;
- whether changes in the attribution of imbalance costs arising out of NETA suggest it would be appropriate to reconsider the network design standards summarised in paragraph 2.7;
- the suggestion in paragraph 3.8 that distribution businesses should not bear the direct costs of imbalances arising out of distribution constraints and failures;
- the advantages and disadvantages of the suggestions for enhancing information and incentives set out in paragraphs 3.9 and 3.10;
- whether the possible suggestions for new standards and penalty payments set out in paragraphs 3.11 and 3.12 are appropriate;
- the possible development of risk hedging services as described in paragraph 3.13; and
- the implications for the distribution price controls.

ANNEX ONE: SUMMARY OF RESPONSES TO CHAPTER 7 (DISTRIBUTION CONSTRAINTS AND EMBEDDED GENERATION ISSUES) OF THE APRIL 2000 NETA CONSULTATION DOCUMENT

Introduction

1. There were 37 responses to the April 2000 NETA consultation paper from a range of interested parties – NGC, generators, suppliers, industry and customer representatives and the 14 Public Electricity Suppliers (PESs). Of these, 24 respondents commented on matters relating to distribution issues.
2. Over half of the respondents welcomed Ofgem's proposal to consult separately on the impact of distribution network constraints and failures within the wider context of other initiatives such as the IIP. Many respondents agreed that the financial impact of distribution constraints and failures on embedded generators, suppliers and distributors might be significant and therefore worthy of consideration before the introduction of NETA.
3. One industry representative noted a concern that decisions on some of the issues raised in recent consultation documents might pre-empt options presently under consideration by the joint DTI and Ofgem working group on embedded generation.

Distribution business liability

4. The April 2000 NETA consultation document recognised that a distribution constraint or failure might result in an embedded generator and or a supplier incurring imbalance charges under NETA. Ofgem invited comments on whether each distribution business should be made liable for these imbalance costs.
5. Seven non-PES respondents supported the concept of making distribution businesses liable for these imbalance costs. Of these, one respondent commented that industrial and commercial customers should be properly compensated for a loss of supply. Nevertheless, the respondent recognised that it may be appropriate to introduce special arrangements for network failures that arise due to severe weather conditions.

6. One respondent suggested that Ofgem should review distribution connection agreements to ensure that there is proper recognition of the liabilities, including financial losses, that result from supply failures.
7. Seven PESs and three non-PES respondents commented that it would be inappropriate to place liability for network constraints and failures on the distribution business. Three PESs said that most distribution constraints and failures are the result of third party damage or severe weather and so are outside the control of the distribution business.
8. A number of PESs and one non-PES respondent commented that network constraints and failures are a direct consequence of the trade off between network security and cost. It was noted that larger industrial and business customers and embedded generators make commercial judgements regarding the level of security available and the capital cost of connecting to a network. It was suggested that embedded generators typically opt for a lower standard of connection and so should bear the risks associated with a loss of supply.
9. Two PESs noted that embedded generators should be required to pay for more robust connection arrangements if distribution businesses are required to accept liability for imbalance costs.

Compensation arrangements and cost recovery

10. A small number of respondents outlined different methods for compensating network users for any imbalance costs that might arise due to distribution constraints or failures.
11. Two PESs supported the introduction of an insurance mechanism. One respondent proposed a compensation mechanism for generators or suppliers that become stranded with enforced imbalances due to distribution network constraints and failures. It was suggested that where the imbalance leaves a participant short of its contracted position then top-up payments should be made at system buy price, whereas imbalances that leave a participant long of its contracted position should be remunerated at system sell price. Another respondent suggested that in the short

term it might be appropriate to treat the costs of interruptions due to distribution constraints and failures as a deemed acceptance to be settled at bid price.

12. A number of PESs commented that any new liabilities should not have an adverse financial impact on the distribution business. Seven PESs noted that the recent distribution price control review did not take account of these additional costs.
13. Many PESs supported the principle of an additional allowance that could be recovered by the distribution business to ensure that the networks are operated and managed efficiently, taking account of any additional risks. Of these, two PESs suggested that an appropriate allowance should be made to reflect both the additional costs of network improvement and the increased cost of capital.

Incentive framework

14. A number of respondents commented on the existing framework of incentives on distribution businesses, embedded generators, and suppliers.
15. In general, PESs support the continuation of the existing incentive framework. Two PESs commented that they did not see a case for an extension of incentives beyond those envisaged by the IIP. Two PESs noted that any measures implemented to address the costs of imbalances due to distribution constraints and failures would need to be consistent with the Standards of Performance. One PES commented that the present regulatory framework provides incentives on the distribution businesses to maximise system availability and security through the existing Standards of Performance.
16. One PES commented that the operation and design of the distribution network had evolved to meet the requirements of demand customers and that these will need to be revisited if distributors are made responsible for the costs of network constraints and failures.
17. A few PESs commented that improving network performance might increase the exposure of suppliers to imbalance costs. They noted that a supplier would typically make projections of future customer requirements using historic performance and such projections would implicitly incorporate a view of average network failure.

Implementation of revised incentive arrangements

18. Several respondents commented that it would be important for Ofgem to address the issue of imbalance costs arising from distribution constraints and failures for the introduction of NETA. However, eight respondents suggested that there would be insufficient time to identify and implement an acceptable and workable solution to the issues before the introduction of NETA.
19. Two respondents suggested that there is a need for interim measures to be put in place to protect the interests of distribution users from an otherwise unmanageable risk.
20. Two PESs supported maintaining existing arrangements until the next distribution price control review to ensure that any additional costs incurred as a result of any increased liabilities can be properly considered.

LIST OF RESPONDENTS

GPU Power UK
Infralec
London Electricity/Sweb
Northern Electric
Norweb Distribution
Norweb Energi
PowerGen
Scottish and Southern Energy
ScottishPower
Seeboard
Seeboard Distribution
TXU Europe
Western Power Distribution
Yorkshire Electricity
Electricity Association - Distribution Commercial Group

Accord Energy
Alcan
Associated Electricity Supplies Limited
Association of Electricity Producers
BNFL Magnox
BOC
British Energy plc
British Gas Trading
CHP Association
Dynergy
Edison Mission Energy
Enron
Intergen
MEUC
National Electricity Consumers Committee
National Grid Company
Npower
Slough Heat and Power
South West ECC
St Clements Services
Teesside Power Limited
Unit[e] energy