

Response to Ofgem/DTI Conclusions and publication of near final legal text of the GB BSC (April 2004)

NGT welcomes this fourth opportunity to comment on the proposals for developing a single GB BSC. We note the comments that Ofgem/DTI make in relation to previous consultations and believe that the findings, as laid out in the 'Conclusions and publication of near final legal text of the GB BSC' document, are appropriate.

Inclusion of recently Approved Modifications in GB BSC legal drafting

As part of the Ofgem/DTI 'Conclusions and publication of near final legal text of the GB BSC', views are specifically sought on the appropriateness of including several BSC Modifications, approved since the third consultation document, in the GB BSC.

NGT supports Ofgem/DTI's proposal to include the legal text associated with P141 (Removal of Unintentional Effects of P106 on Supplier Charges), P133 (Facility to permit BSCCo to undertake role of Profile Admin.), and P127 (Optional De-Registration by Insolvent Party), in the GB BSC. We agree with the proposals to effect the modifications in the GB BSC by implementing the current legal drafting applicable to the England and Wales BSC.

Half-hourly data for transmission owners

We note the fact that Ofgem/DTI has not yet reached a decision on the need for half-hourly data for transmission owners and recognise that the question of the requirement for such data is being discussed at the Data Exchange Development Group. National Grid believes that, in the absence of any specific requirement being identified by the Data Exchange Development Group, the provisions of Modification P114 (Entitlement of LEGs and Non-Trading Parties to BSC Membership) will enable transmission owners to fully meet their requirement for Half-hourly Settlement Data.

It is our assumption that any Settlement Data that the STC requires to be passed to Transmission Owners will be able to be obtained directly by the Transmission Owner under the BSC. If this not the case we believe the appropriate and efficient solution would be for further changes to the BSC to be introduced to facilitate this.

Transmission Connected Small Generators

We note that in the conclusion to Ofgem/DTI's Small Generator's consultation it is proposed that "an amendment is made to the GB Connection and Use of System Code ("CUSC") to relieve, in certain circumstances the obligation on small transmission connected generators to be a party to the GB Balancing and Settlement Code". Under the BSC section K2.1 requires that metering systems that measure quantities of imports or exports from plant or apparatus, which is directly connected to the transmission system, shall be registered in CMRS. Hence under BSC K3.1.4 the appropriate BM Unit(s) will need to be registered for such a Small Generator. If the Small Generator is not a BSC Party then another BSC Party will need to register the BM Unit(s). This will split some of the responsibilities arising from the Small Generator in the BSC and we are continuing to evaluate the consequential changes to other documents arising from this proposed change to CUSC on this basis.