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Dear David

### **Re: BETTA Go Live and Contingency Arrangements**

The following response is submitted on behalf of Gaz de France ESS and refers to your Ofgem/DTI joint consultation 'BETTA Go Live and contingency planning' dated 18<sup>th</sup> February 2005.

### **BETTA Go Live**

To date Gaz de France ESS has been led to believe that the Secretary of State will give an indication in early March 2005 that BETTA Go Live should take place on the 1<sup>st</sup> April 2005, indeed your consultation document reiterates this working assumption. In addition Elexon have indicated that they have identified 15<sup>th</sup> March 2005 as the Settlement System point of no return. Our internal BETTA project has used these dates to drive our own implementation plans. It is therefore of great concern that a late, and somewhat unexpected consultation on the potential fallout from a delay to implementation, has appeared at this late stage in the development cycle.

### **Actions following a delay**

Gaz de France ESS would prefer, should the need to defer BETTA Go Live be identified following the Elexon 15<sup>th</sup> March 2005 point of no return, that any consequent settlement dispute be subject to provisions established within the Balancing and Settlement Code. However following the events that unfolded post NETA Go Live which led to P6, it is not unfair to assume that this could be a costly, complex and time-

consuming operation and therefore delay should be avoided in the first instance.

We do not support solution (i) outlined within the consultation document offering the opportunity for post event revisions to notified contract positions. This would introduce a level of unnecessary risk and uncertainty for all market participants.

We would reluctantly agree that option (ii) referring to the establishment of a single imbalance price would appear to provide an emergency solution. However we believe there to be a significant amount of preparation work required in order to make this a viable option of choice. Prior to NETA Go Live there was significant debate around how a single imbalance price would be constructed, I am not aware of any recent industry debate for such price determination post NETA Go Live. If it looks like this option would need to be utilised then there needs to be a piece of work initiated as a matter of urgency around the process of assistance required to support the BSC Panel during this time. The work should also include determination of a mechanism to convey the price information to market participants in a timely manner.

I hope at this late stage that there will be no delay to BETTA implementation however if this transpires that this is likely to occur I trust market participants will be made aware of such a threat as soon as possible in order that any mitigating action can be initiated.

Should you require any further information please do not hesitate to contact me on 0113 306 2122.

Yours sincerely

**Barbara Vest**  
**Regulatory Affairs Manager**