

## **Response to the Ofgem/DTI Consultation Letter on BETTA Go-Live and Contingency Planning - February 2005**

1. We welcome the opportunity to comment on “BETTA Go-Live and Contingency Planning”. Clearly a flexible approach is required to arrangements of this type have to address a large number of potentially unforeseen situations.
2. We note the approach in the letter that the currently anticipated BETTA go-live date is 1 April 2005 and it is also anticipated that the Secretary of State will formally indicate this as the BETTA go-live date in a direction in early March.
3. We support the Ofgem/DTI view that if as a result of unforeseen events problems arose prior to BETTA Go-Live it would most likely be appropriate that BETTA still takes effect on and from that date. The consequences of any such events would then be addressed under the enduring BETTA framework rather than to delay BETTA. We agree that a delay could cause additional disruption.
4. A decision to enact BETTA Go-Live under any contingency should be for the simultaneous enactment of the whole BETTA framework. Partial implementation of BETTA (for example by enacting the trading components but not the transmission components) would also cause additional disruption, and further issues to be resolved. If the transmission framework is not appropriately established a whole range of problems could occur that potentially interact with the trading issues. One simple example is that the collection BSUoS is related to funding balancing actions, and requires the appropriate agreements to be in place under the transmission framework. This is just one example of issues that may occur. Hence, we recommend even under contingencies a single Go-Live date applies to both the transmission and trading aspects of BETTA.