



## **AMENDMENT REPORT**

### **CUSC Proposed Amendment CAP158**

#### **Provision of Interim response Volume Information**

*The purpose of this report is to assist the Authority in their decision of whether to implement Amendment Proposal CAP158*

Amendment Ref	CAP158
Issue	1.0
Date of Issue	18 <sup>th</sup> December 2007
Prepared by	National Grid

**I DOCUMENT CONTROL**

**a National Grid Document Control**

Version	Date	Author	Change Reference
0.1	16/11/07	National Grid	Draft for comment
0.2	27/11/07	National Grid	For Panel Vote
0.3	10/12/07	National Grid	For Panel Comment following Vote
0.4	10/12/07	National Grid	Amended For Panel Comment following Vote
1.0	18/12/07	National Grid	Formal version for submission to the Authority

**b Document Location**

National Grid Website:

[www.nationalgrid.com/uk/Electricity/Codes/](http://www.nationalgrid.com/uk/Electricity/Codes/)

**c Distribution**

Name	Organisation
The Gas and Electricity Markets Authority	Ofgem
CUSC Parties	Various
Panel Members	Various
National Grid Industry Information Website	

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## 1 SUMMARY AND RECOMMENDATIONS

### Executive Summary

- 1.1 CAP158 Provision of interim response volume information was proposed by National Grid and submitted to the Amendment Panel on 31 August 2007.
- 1.2 The original CAP158 proposal was associated with publication of interim mandatory utilisation volumes only.
- 1.3 An alternative amendment has been proposed by EDF that extends the publication of interim mandatory volume data to include volume data from BMUs that have supplied commercial frequency response services.
- 1.4 The consultation document was published on 14 September 2007. All consultation responses received supported the intent behind CAP158. One consultation alternative was proposed and the consultation alternative was published on 26 October 2007.

### National Grid Recommendation

- 1.5 National Grid, as the Proposer is supportive of the Original Amendment Proposal. After considering the industry responses, National Grid does not believe that it is appropriate to include obligations for publication of commercial data within the CUSC framework as proposed by the CAP158 Alternative Amendment.

### Amendment Panel Recommendation

- 1.6 The result of the Panel Recommendation Vote as to whether CAP158 BETTER facilitated the Applicable CUSC Objectives was as follows:

Original - Yes - unanimously  
CAA - No – Majority (2 Panel members voted for CAA)

BEST Original – (majority of 8)

## 2 PURPOSE AND INTRODUCTION

- 2.1 This Amendment Report has been prepared and issued by National Grid under the rules and procedures specified in the Connection and Use of System Code (CUSC) as designated by the Secretary of State.
- 2.2 Further to the submission of Amendment Proposal CAP158 (see Annex 2) and the subsequent wider industry consultation that was undertaken by National Grid, this document is addressed and furnished to the Gas and Electricity Markets Authority (“the Authority”) in order to assist them in their decision whether to implement Amendment Proposal CAP158.
- 2.3 CAP158 was proposed by National Grid and submitted to the CUSC Amendments Panel for consideration at their meeting on 31<sup>st</sup> August 2007. The Amendments Panel determined that CAP158 was appropriate to proceed to wider industry consultation by National Grid.

- 2.4 This document outlines the nature of the CUSC changes that are proposed. It incorporates National Grid's recommendations to the Authority concerning the Amendment. Copies of all representations received in response to the consultation have been also been included and a 'summary' of the representations received is also provided. Copies of each of the responses to the consultation are included as Annex 3 to this document.
- 2.6 This Amendment Report has been prepared in accordance with the terms of the CUSC. An electronic copy can be found on the National Grid website, at [www.nationalgrid.com/uk/Electricity/Codes/](http://www.nationalgrid.com/uk/Electricity/Codes/).

### **3.0 PROPOSED AMENDMENT**

- 3.1 Currently Mandatory Frequency Response utilisation volume data for previous months are published on the 9<sup>th</sup> Business day of each month and Mandatory response energy prices are required to be submitted by the end of the 15<sup>th</sup> Business Day of each month. The submitted prices are then published on the 16<sup>th</sup> Business Day of the month. Consequently, the short time scales between the volume data publication and the price submission provides Users with a limited amount of time to analyse the market and respond accordingly.
- 3.2 CAP158 proposes to amend the CUSC to include an additional clause in the CUSC 4.1.3.13A stating that National Grid will use reasonable endeavours to publish the interim non-validated mandatory volume data by the end of the 3<sup>rd</sup> business Day of the month.
- 3.2 Consequently, this amendment will improve information for market participants prior to them submitting their monthly prices.

### **4.0 ALTERNATIVE AMENDMENT**

#### **Consultation Alternative**

- 4.1 **CAA1 – EDF** – proposes that National Grid publish the data outlined in CAP158 original, with additional data published covering the volumes of response provided by BMUs under a commercial response service agreement. The timescales for data publication remain the same as the original, reasonable endeavours to publish on the 3<sup>rd</sup> business day of the month.

### **5.0 ASSESSMENT AGAINST APPLICABLE CUSC OBJECTIVES**

#### **Proposed Amendment**

- 5.1 CAP158 would better facilitate the CUSC Objective(s);
- (a) *the efficient discharge by the Licensee of the obligations imposed upon it by the act and the Transmission Licence;*  
by improving information for market participants prior to them submitting their monthly prices.
- (b) facilitating effective competition in generation and supply of electricity and facilitating such competition in the sale, distribution and purchase of electricity.

## **Consultation Alternative Amendment**

- 5.5 CAP158 Consultation Alternative would better facilitate the CUSC Objective(s);

*(b) facilitating effective competition in generation and supply of electricity and facilitating such competition in the sale, distribution and purchase of electricity.*

by providing improved information to the market and hence provide the market with improved ability to respond to market signals.

## **6.0 PROPOSED IMPLEMENTATION**

- 6.1 National Grid with Industry support propose CAP158 should be implemented 10 business days after an Authority decision.

## **7.0 IMPACT ON THE CUSC**

- 7.1 CAP158 requires amendments to 4.1.3.13A of the CUSC.
- 7.2 The text required to give effect to the Original Proposal is contained as Part A of Annex 1 of this document.
- 7.4 The text to give effect to the Consultation Alternative Amendment is attached as Part B of Annex 1 of this document.

## **8.0 IMPACT ON CUSC PARTIES**

### **Proposed Amendment**

- 8.1 CAP158 has no impact upon CUSC parties

### **Consultation Alternative**

- 8.2 CAP158 Consultation Alternative Amendment has no impact upon CUSC parties

## **9.0 IMPACT ON INDUSTRY DOCUMENTS**

### **Impact on Core Industry Documents**

- 9.1 CAP158 has no impact upon Core Industry Documents.

### **Impact on other Industry Documents**

- 9.2 CAP158 has no impact upon other Industry Documents.

## **10.0 IMPACT ON INDUSTRY COMPUTER SYSTEMS OR PROCESSES**

- 10.1 CAP158 has no impact upon on Industry Computer Systems or Processes

## 11.0 VIEWS AND REPRESENTATIONS

11.1 This Section contains a summary of the views and representations made by consultees during the consultation period in respect of the Proposed Amendment and the Alternative Amendment.

### Views of Panel Members

11.2 No views or representations were made by the Panel members in their capacity as Panel Members during the consultation.

### View of Core Industry Document Owners

11.3 No representations received.

### Responses to Consultation

11.5 The following table provides an overview of the representations received. Copies of the representations are attached as Annex 3.

Reference	Company	Supportive	Comments
CAP158-CR-01	EDF	Yes	Supportive for the original proposal, also submitted CAA1
CAP158-CR-02	Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd	Yes	Supportive for the original proposal
CAP158-CR-03	SAIC Ltd. For and behalf of : ScottishPower's Energy Wholesale business which includes Scottish Power Generation Ltd, ScottishPower Energy Management Ltd and CRE Energy Ltd	Yes	Supportive for the original proposal
CAP158-CR-04	RWE Group: RWE Npower plc, Npower Cogen Limited, Npower Cogen Trading Limited, Npower Direct Limited, Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited.	Yes	Supportive for the original proposal

## Responses to Consultation Alternative

11.6 The following table provides an overview of the representation received from the consultation alternative. Copies of the representation are attached as Annex 3.

Reference	Company	Supportive	Comments
CAP158-CAAR-01	First Hydro	No	No support for the alternative
CAP158-CAAR-02	Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd	Yes	Supportive for the original proposal and the alternative proposal
CAP158-CAAR-3	British Energy , Power and Energy Trading	Yes	Preference for the alternative proposal
CAP158-CAAR-4	E.ON UK	No comment received	Would like the issues arising from the alternative to be analysed further

## National Grid View

11.7 National Grid is supportive of supplying improved information to help facilitate the frequency response market. The original proposal was proposed after discussions with the industry and aims to improve the information on utilisation volumes prior to mandatory price submission. Therefore, National Grid supports the implementation of this modification.

11.8 The CUSC governs the commercial arrangements surrounding mandatory frequency response. Commercial frequency response is governed via bi-lateral agreements with the market participants. Therefore, as stated in a number of industry response, it would seem inappropriate to include provisions in the CUSC for the publication of commercial frequency response utilisation volume information.

11.9 National Grid is supportive of setting up a working group to discuss the methodology for publication of commercial frequency response volumes.

## 12.0 COMMENTS ON DRAFT AMENDMENT REPORT

12.1 National Grid received no responses following the publication of the draft Amendment Report.

## 13.0 AMENDMENT PANEL RECOMMENDATION

13.1 The result of the Panel Recommendation Vote as to whether CAP158 BETTER facilitated the Applicable CUSC Objectives was as follows:

Original - Yes - unanimously  
CAA - No – Majority (2 Panel members voted for CAA)

BEST Original – (majority of 8)

## **14.0 NATIONAL GRID RECOMMENDATION**

- 14.1 National Grid, as the proposer is supportive of the Original Amendment Proposal.
- 14.2 National Grid does not support the implementation of CAP158 CAA1. After considering the industry responses National Grid does not believe that it is appropriate to include obligations for publication of commercial data within the CUSC framework as proposed by the CAP158 Alternative Amendment.



## ANNEX 1 – PROPOSED LEGAL TEXT TO MODIFY THE CUSC

### Part A - Text to give effect to the Original Proposed Amendment

The proposed legal text to modify the CUSC is detailed below by inserting the coloured underlined text to CUSC 4.1.3.13A as (c) and renumber subsequent paragraphs

(c) In respect of each day in a calendar month, **The Company** shall use reasonable endeavours to publish on its web-site by the third **Business Day** of the calendar month following that calendar month, provisional data in respect of all **BM Units** details of instructions issued by **The Company** in accordance with Paragraph 4.1.3.4 for each of **Primary Response, High Frequency Response** and **Secondary Response** (in such form and manner as shall be prescribed by **The Company** from time to time). The **Users** recognise that the provisional data may differ from the data to be provided under Paragraph 4.1.3.13A (d) and therefore any reliance upon this provisional data is entirely at the **User's** risk.

### Part C – Text to give effect to the Consultation Alternative Amendment

#### Part B - Text to give effect to the Alternative Amendment

(When compared to the original proposal the underlined text is additional text and the text which has ~~strikeout~~ is the text to be removed)

#### Amend CUSC 4.1.3.13A accordingly, renumbering subsequent paragraphs

(c) In respect of each day in a calendar month, **The Company** shall use reasonable endeavours to publish on its web-site by the third **Business Day** of the calendar month following that calendar month, provisional data in respect of all **BM Units** details of instructions issued by **The Company** in accordance with Paragraph 4.1.3.4 for each of **Primary Response, High Frequency Response** and **Secondary Response** (in such form and manner as shall be prescribed by **The Company** from time to time). The **Users** recognise that the provisional data may differ from the data to be provided under Paragraph 4.1.3.13A (e) and therefore any reliance upon this provisional data is entirely at the **User's** risk.

(d) In respect of each day in a calendar month, **The Company** shall use reasonable endeavours to publish on its web-site by the third **Business Day** of the calendar month following that calendar month, provisional data in respect of all **BM Units** details of instructions issued by **The Company** in accordance with any **Commercial Ancillary Service of Frequency Response** as may be agreed to be provided by a **User** for each of **Primary Response, High Frequency Response** and **Secondary Response** (in such form and manner as shall be prescribed by **The Company** from time to time). The **Users** recognise that the provisional data may differ from the data to be provided under Paragraph 4.1.3.13A (f) and therefore any reliance upon this provisional data is entirely at the **User's** risk.

(e) In respect of each day in a calendar month, **The Company** shall, by the ninth **Business Day** of the calendar month following that calendar month, publish on its web-site in respect of all **BM Units** details of instructions issued by **The Company** in accordance with Paragraph 4.1.3.4 for each of **Primary Response, High Frequency Response** and **Secondary Response** (in such form and manner as shall be prescribed by **The Company** from time to time).

(f) In respect of each day in a calendar month, **The Company** shall, by the ninth **Business Day** of the calendar month following that calendar month, publish on its web-site in respect of all **BM Units** details of instructions issued by **The Company** in accordance with any **Commercial Ancillary Service of Frequency Response** as may be agreed to be provided by a **User** for each of **Primary Response, High Frequency Response** and **Secondary Response** (in such form and manner as shall be prescribed by **The Company** from time to time).

**ANNEX 2 – AMENDMENT PROPOSAL FORM****Part A****Original Proposal Form**

<b>CUSC Amendment Proposal Form</b>	<b>CAP:158</b>
<b>Title of Amendment Proposal:</b> Provision of interim response volume information	
<b>Description of the Proposed Amendment (mandatory by proposer):</b>  It is proposed to extend the current information arrangements for providing mandatory frequency response volume data by including additional clause in CUSC 4.1.3.13A.  This will require National Grid, using reasonable endeavours, to publish additional volume data by the end of the 3 <sup>rd</sup> Business Day using non-validated data will enable the market to better respond to the volume signals prior to the monthly price submission.  Consequently, this amendment will improve information for market participants prior to them submitting their monthly prices.  .	
<b>Description of Issue or Defect that Proposed Amendment seeks to Address (mandatory by proposer):</b>  Currently, mandatory frequency response volume data for the previous month is posted on the 9 <sup>th</sup> Business Day of the month. The 9 <sup>th</sup> day is used to ensure that the data posted is based on validated data and provides a best view of the volumes of frequency response held by National Grid during the previous month.  Mandatory response energy prices for the following month are required to be submitted by the end of the 15 <sup>th</sup> Business Day of the month and published on the 16 <sup>th</sup> Business Day. These dates are designed to be as late in the month as possible - there are certain months of the year where there are only 18 Business Days in the month. Confirmation of prices on the 16 <sup>th</sup> business day allows National Grid with a minimum of 2 Business Days to analyse the information prior to prices becoming active. As such there is little time to delay further the submission of prices to National Grid, therefore it is proposed to bring forward the publication of historic data.  It is proposed that earlier publication of the previous month's mandatory response volumes will give participants more time to analyse the market and thereby enable them to better respond to the signal in their next monthly price submissions. However, earlier submission of validated data is not possible. Therefore it is suggested to provide an additional volume report using non-validated data. This will enable participants to have additional time to analyse the data prior to price submission.	
<b>Impact on the CUSC (this should be given where possible):</b>  Additional clause in the CUSC 4.1.3.13A stating that National Grid will use reasonable endeavours to publish the interim non-validated mandatory volume data by the end of the 3 <sup>rd</sup> Business Day of the month.	
<b>Impact on Core Industry Documentation (this should be given where possible):</b>  None anticipated.	

<b>Impact on Computer Systems and Processes used by CUSC Parties</b> ( <i>this should be given where possible</i> ):	
<b>Details of any Related Modifications to Other Industry Codes</b> ( <i>where known</i> ):	
None anticipated.	
<b>Justification for Proposed Amendment with Reference to Applicable CUSC Objectives**</b> ( <b>mandatory by proposer</b> ):	
National Grid believes that this proposal will better facilitate CUSC Applicable Objective (b) ( <b>facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity</b> ) by providing improved information to the market and hence provide the market with improved ability to respond to market signals.	
<b>Details of Proposer:</b> Organisation's Name:	National Grid
<i>Capacity in which the Amendment is being proposed:</i> (i.e. CUSC Party, BSC Party or "energywatch")	CUSC Party
<b>Details of Proposer's Representative:</b> Name: Organisation: Telephone Number: Email Address:	<b>Malcolm Arthur</b> <b>National Grid</b> <b>01925 654909</b> <b>Malcolm.arthur@uk.ngrid.com</b>
<b>Details of Representative's Alternate:</b> Name: Organisation: Telephone Number: Email Address:	<b>Emma Carr</b> <b>National Grid</b> <b>01926 655843</b> <b>Emma.j.carr@uk.ngrid.com</b>
<b>Attachments (Yes/No):</b> No. <b>If Yes, Title and No. of pages of each Attachment:</b>	

**Part B – Consultation Alternative Proposal**

<b>CUSC Consultation Alternative Amendment Proposal Form</b>
<p><b>CUSC working title of the Amendment Proposal and corresponding CAP reference</b>                      CAP158 Provision of interim response volume information</p>
<p><b>Description of the Proposed Consultation Alternative Amendment (mandatory by proposer):</b>                      CAP158 proposes to extend the current information arrangements for providing mandatory frequency response volume data by including additional clause in CUSC 4.1.3.13A.                      The CAA will require National Grid, to publish additional volume data for Commercial Frequency Response (such as Firm contracts) on the 3<sup>rd</sup> business day as per the CAP158 proposal for Mandatory Response.                      It will also codify in the CUSC an obligation on NGET to publish validated Commercial Frequency Response data upon the 9<sup>th</sup> business day of the month.                      It places no obligation for NGET to publish information on Frequency Control Demand Management (FCDM) as it refers solely to BM units.</p>
<p><b>Description of differences between the proposed Consultation Alternative Amendment compared to Original proposal / Working Group alternative (mandatory by proposer):</b>                      The CAA aims to provide Commercial holding volumes in addition to Mandatory holding volumes to assist synchronous Mandatory providers in setting holding prices for the following month.</p>
<p><b>Justification for the proposal of the Consultation Alternative (including why the original proposal / Working Group alternative does not address the defect) (mandatory by proposer):</b>                      The justification is identical to CAP158 original.</p>
<p><b>Impact on the CUSC (this should be given where possible):</b>                      Additional clause in the CUSC 4.1.3.13A stating that National Grid will use reasonable endeavours to publish the interim non-validated mandatory volume data <b>AND</b> Commercial Response holding data by the end of the 3<sup>rd</sup> Business Day of the month;                      Additional clause in the CUSC 4.1.3.13A stating that National Grid will publish the validated Commercial Response volume data by the end of the 9<sup>th</sup> Business Day of the month;</p>
<p><b>Impact on Core Industry Documentation (this should be given where possible):</b>                      None</p>
<p><b>Impact on Computer Systems and Processes used by CUSC Parties (this should be given where possible):</b>                      None</p>
<p><b>Justification for Proposed Consultation Alternative Amendment with Reference to Applicable CUSC Objectives** (mandatory by proposer):</b>                      EDF Energy believes that this proposal will better facilitate CUSC Applicable Objective (b) <b>(facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity)</b> by providing improved information to the market and hence provide the market with improved ability to respond to market signals.                      We believe the CAA is superior to the original amendment for this applicable CUSC objective.</p>

m

<b>Details of Proposer of Consultation Alternative Amendment:</b> Organisation's Name:	EDF Energy
<b>Capacity in which the Amendment is being proposed:</b> (i.e. CUSC Party, BSC Party or "energywatch")	CUSC Party
<b>Details of Consultation Alternative Proposer's Representative:</b> Name: Organisation: Telephone Number: Email Address:	David Scott EDF Energy 0207 752 2524 david.j.scott@edfenergy.com
<b>Details of Representative's Alternate:</b> Name: Organisation: Telephone Number: Email Address:	Paul Mott EDF Energy 0207 752 2517 paul.mott@edfenergy.com
<b>Attachments (Yes/No):</b> <b>If Yes, Title and No. of pages of each Attachment:</b>	Legal text see below

**Notes:**

- Those wishing to propose an Amendment to the CUSC should do so by filling in this "Amendment Proposal Form" that is based on the provisions contained in Section 8.15 of the CUSC. The form seeks to ascertain details about the Amendment Proposal so that the Amendments Panel can determine more clearly whether the proposal should be considered by a Working Group or go straight to wider National Grid Consultation.
- The Panel Secretary will check that the form has been completed, in accordance with the requirements of the CUSC, prior to submitting it to the Panel. If the Panel Secretary accepts the Amendment Proposal form as complete, then he will write back to the Proposer informing him of the reference number for the Amendment Proposal and the date on which the Proposal will be considered by the Panel. If, in the opinion of the Panel Secretary, the form fails to provide the information required in the CUSC, then he may reject the Proposal. The Panel Secretary will inform the Proposer of the rejection and report the matter to the Panel at their next meeting. The Panel can reverse the Panel Secretary's decision and if this happens the Panel Secretary will inform the Proposer.

The completed form should be returned to:

Beverley Viney  
Panel Secretary  
Commercial Frameworks  
National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

Or via e-mail to: [Beverley.Viney@uk.ngrid.com](mailto:Beverley.Viney@uk.ngrid.com)

(Participants submitting this form by email will need to send a statement to the effect that the proposer acknowledges that on acceptance of the proposal for consideration by the Amendments Panel, a proposer which is not a CUSC Party shall grant a licence in accordance with Paragraph 8.15.7 of the CUSC. A Proposer that is a CUSC Party shall be deemed to have granted this Licence).

## ANNEX 3 – REPRESENTATIONS RECEIVED DURING CONSULTATION

This Annex includes copies of any representations received following circulation of the Consultation Document (circulated on [date], requesting comments by close of business on [date]).

Representations were received from the following parties:

No.	Company	File Number
1	EDF	CAP158-CR-01
2	Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd	CAP158-CR-02
3	SAIC Ltd. For and behalf of : ScottishPower's Energy Wholesale business which includes Scottish Power Generation Ltd, ScottishPower Energy Management Ltd and CRE Energy Ltd	CAP158-CR-03
4	RWE Group: RWE Npower plc, Npower Cogen Limited, Npower Cogen Trading Limited, Npower Direct Limited, Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited.	CAP158-CR-04

<b>Reference</b>	CAP158-CR-01
<b>Company</b>	EDF

Beverly Viney  
Amendments Panel Secretary  
Electricity Codes  
National Grid [National Grid House]  
Warwick Technology Park  
Gallows Hill, Warwick  
CV34 6DA



09 October 2007

Dear Beverley,

**CUSC Amendment Proposal CAP158 Provision of interim response volume information**

EDF Energy is pleased to have the opportunity to comment on the CUSC amendment proposal, CAP158.

EDF Energy is supportive of the amendment proposal, as it will ensure providers of Mandatory frequency response will have an extra week to assess holding volumes and revenues before submitting holding rates for the next month.

We do have two points:

1. The earlier publication will not remove the one month lag in holding data compared to the submission of prices. For instance, holding rates for October will be set on the basis of volume data from August. This is because the October price submission is prior to the publishing of September volumes as these are published in the following month. This is true of current arrangements and if CAP158 is implemented.
2. National Grid publishes holding volumes for Mandatory and Firm Frequency Response services on the 9<sup>th</sup> business day of the month. CAP158 will only ensure it publishes Mandatory, not Firm, Response volumes on the 3<sup>rd</sup> business day.

With regard to the second point we would like to raise a consultation alternative amendment. It aims to ensure response volumes procured from BMUs under commercial agreements will also be published.

We hope that you will find these comments helpful. If you have any queries please do not hesitate to me on the number below.

Yours sincerely,

David Scott  
Electricity Regulation,  
Energy Branch,  
EDF ENERGY

	<p><b>EDF Energy</b> 40 Grosvenor Place Victoria London SW1X 7EN</p>	<p><b>Tel +44 (0) 20 7752 2524</b></p>	<p><a href="http://edfenergy.com">edfenergy.com</a></p>
<p>EDF Energy plc. Registered in England and Wales. Registered No. 2366852. Registered Office: 40 Grosvenor Place, Victoria, London, SW1X 7EN</p>			



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<b>Reference</b>	CAP158-CR-02
<b>Company</b>	Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd

Dear Sirs,

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

In relation to the consultation concerning CAP 158 "Provision of Interim Response Volume Information" (contained within your note of 14th September 2007) we agree with the view of National Grid that this Amendment Proposal would better facilitate the achievement of the Applicable CUSC Objectives.

Regards

Garth Graham  
Scottish and Southern Energy plc

<b>Reference</b>	CAP158-CR-03
<b>Company</b>	SAIC Ltd. For and behalf of : ScottishPower's Energy Wholesale business which includes Scottish Power Generation Ltd, ScottishPower Energy Management Ltd and CRE Energy Ltd



Beverley Viney  
Amendments Panel Secretary  
Electricity Codes  
National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

**Ref** CAP158  
**Date** 12<sup>th</sup> October 2007

**Tel No.** 01355 845208  
**Email:** [ukelectricityspoc@saic.com](mailto:ukelectricityspoc@saic.com)

Dear Beverley,

**CUSC Amendment Proposal CAP158, Provision of Interim Response Volume information**

Thank you for the opportunity to comment on the Consultation for Amendment Proposal CAP158. This response is submitted on behalf of ScottishPower's Energy Wholesale Business which includes ScottishPower Generation Ltd, ScottishPower Energy Management Ltd and CRE Energy Ltd.

ScottishPower supports the earlier publication of Mandatory Frequency Response data. We feel that earlier sight of this data, even though it is not firm, will allow us to respond to the published volume data with more flexibility where required.

Yours sincerely

**Gary Henderson**



For and on behalf of: ScottishPower's Energy Wholesale Business which includes ScottishPower Generation Ltd, ScottishPower Energy Management Ltd and CRE Energy Ltd.

<b>Reference</b>	CAP158-CR-04
<b>Company</b>	RWE Group: RWE Npower plc, Npower Cogen Limited, Npower Cogen Trading Limited, Npower Direct Limited, Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited.

RWE Trading



Beverley Viney  
Amendments Panel Secretary  
Electricity Codes  
National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

Name Raoul Thulin  
Phone 01793 892634  
Fax 01793 892167  
E-Mail raoul.thulin@rwe.com

11<sup>th</sup> September 2007

**CUSC Amendment Proposal CAP158 Provision of interim response volume information - Consultation Response**

Dear Ms Viney

Thank you for the opportunity to respond to the above consultation. The following response is provided on behalf of the following CUSC Parties within the RWE Group: RWE Npower plc, Npower Cogen Limited, Npower Cogen Trading Limited, Npower Direct Limited, Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited.

We support the aims of CAP158 and believe that the proposed change will aid the efficient functioning of the pricing process for frequency response. We consider that the proposed timescale for the implementation of CAP158, should it be approved, is appropriate.

Yours sincerely,

By e-mail

Raoul Thulin  
Ancillary Services Manager

RWE Trading GmbH  
Swindon Branch  
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Whitehill Way  
Swindon SN5 6PB  
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Peter Terium (CEO)  
Dr Peter Kreuzberg  
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Essen, Germany  
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**ANNEX 4 – REPRESENTATIONS RECEIVED DURING CONSULTATION**

This Annex includes copies of any representations received following circulation of the Consultation Document (circulated on 26<sup>th</sup> October 2007, requesting comments by close of business on 1<sup>th</sup> November 2007).

Representations were received from the following parties:

<b>No.</b>	<b>Company</b>	<b>File Number</b>
1	First Hydro	CAP158-CAAR-01
2	Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd	CAP158-CAAR-02
3	British Energy, Power and Energy Trading	CAP158- CAAR - 03
4	E.ON UK	CAP158- CAAR - 04

<b>Reference</b>	CAP158-CAAR-04
<b>Company</b>	First Hydro



**First Hydro Company**  
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St David's Park  
Deeside  
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By e-mail Beverley.viney@uk.ngrid.com

Lillian Macleod  
Amendments Panel Secretary  
Electricity Codes  
National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

7<sup>th</sup> November 2007

Dear Lillian

**CAP 158 Interim Response Volume**

International Power (IPR) is responding to your CAP158 consultation alternative CAA1 on behalf of First Hydro Company, Saltend Cogeneration Company Ltd, Rugeley Power Ltd, Deeside Power Development Company Ltd and Indian Queens Power Ltd.

We do not support the consultation alternative CAA1 which proposes placing an obligation in the CUSC to provide details of Commercial Frequency Response Volumes.

Whilst we have no objection to publishing Commercial Frequency Response Volumes in the same time scale as Mandatory Frequency Volumes (as is done at present) CUSC is not the appropriate vehicle for this.

Commercial Services such as STOR (Short Term Operating Reserve, Fast Reserve and Firm Frequency response) are bi-lateral agreement with NG based on generic terms. The provision of information from these contracts is provided by NG under the Procurement Guidelines or the standard contract terms.

Yours sincerely

Simon Lord

Transmission Services Manager



First Hydro Company Registered Office:  
Senator House, 85 Queen Victoria Street, London, EC4V 4DP  
Registered in England and Wales No. 2444277 VAT Registration No. 656 2000 65



INVESTOR IN PEOPLE

<b>Reference</b>	CAP158-CAAR-02
<b>Company</b>	Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd

Dear Sirs,

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

In relation to the consultation concerning CAP 158 "Provision of Interim Response Volume Information" Consultation Alternative Amendment (contained within your note of 26th October 2007) we agree with the initial view of National Grid that the original and the proposed alternative would better facilitate the achievement of the Applicable CUSC Objectives.

Regards

Garth Graham  
Scottish and Southern Energy plc

<b>Reference</b>	CAP158-CAAR-03
<b>Company</b>	British Energy Power and Energy Trading

Dear Lillian,

Thank you for the opportunity to comment on CUSC Consultation Alternative CAP158 'Provision of Interim Response Volume Information'. This consultation alternative by EDF Energy proposes additional data is published covering the volumes of response provided by BMUs under a commercial response service agreement. The timescales for publication of this additional data remain the same as in the original proposal.

BE supports this Consultation Alternative Amendment 1 as better facilitating applicable CUSC objectives and also consider it better than the original proposal.

Yours sincerely

John  
Senior Trading  
British Energy, Power and Energy Trading

Morris  
Consultant

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<b>Reference</b>	CAP158-CAAR-04
<b>Company</b>	E.ON UK



Beverley Viney  
Amendments Panel Secretary  
Electricity Codes  
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Friday 9 November 2007

Dear Beverley,

**Response to CAP158 Consultation Alternative CAA1, Provision of Interim Response Volume Information**

Thank you for the opportunity to comment on CAP158 CAA1. We agree that in principle there will be a benefit to the market if more information can be provided on volumes of response, for the reason given by EDF Energy. However we do not wish to comment on whether the alternative proposal better facilitates the applicable objectives.

This is because we believe that it presents questions that should be considered by a working group, as its scope goes some way beyond the original. Whereas the original is limited to providing existing information earlier, the alternative asks that currently undisclosed information is shared.

Questions arise from the potential impact of this precedent. For example, it would show the market whether a generator has a commercial agreement with National Grid or not. We therefore think it appropriate for the issues arising from the alternative to be analysed further.

Yours sincerely,

Ben Sheehy  
Trading Arrangements  
Energy Wholesale

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