## MP749AE – UKL13829 – DN Interruption - Communication 1 of 1

Shipper	Name	Date	Accept /Reject	Publish	Shipper Comments	xoserve Comments
Scottish & Southern Energy	Martin Brandt	27/07/07	Accept Solution	YES	Would be able to support the new flows and new rejection codes for existing flows. However in addition to the information being made available on IAD, we would want a simple report listing all successful bids by MPRN. This could be just made available on Xoserve's website in a downloadable form.	The legal interpretation is still being investigated with Networks. xoserve will continue to develop the IAD solution but will provide an undertaking to continue to pursue additional reporting options.
Shell Gas Direct	Simon Carter	27/07/07	Reject	YES	1EPS File: this file should be re- issued whenever any supply point becomes eligible for inclusion in the portfolio of supply points against which a shipper may place a bid. This would account for churned supply points and also supply points against which the AQ data may have been amended moving it into eligible status. These should continue to be sent until the end of the bid window. It is not clear from the information provided that this will be the case. This requirement would allow a shipper to be sure which supply points are eligible.	<ul> <li>Thanks for your comments.</li> <li>1. The purpose of the EPS file is for Shippers to verify that all the sites that are considered to be eligible for interruption have been identified. Any sites that are not on the list may be the subject an inaccuracy in data (incorrect AQ etc) and will need to be amended via the existing SPA correction methods prior to the start of the bid window to enable a valid bid to be made.</li> <li><u>File Scheduling</u></li> <li>The EPS file will be issued to shippers on 1<sup>st</sup> April 2008.</li> <li>PIR File will be issued to shippers 1<sup>st</sup> May 2007. This will capture any additions since the EPS file.</li> <li>During the period 2<sup>nd</sup> May – 4<sup>th</sup> June a .PIR file will be sent on each day that a site become eligible in a shipper's portfolio (AQ correction, confirmed with new shipper etc). It is 7 days prior to the close of the bid window as a site</li> </ul>

	2EPS File: a mechanism for informing a shipper that a supply point has been removed from their eligible portfolio is required. This would be used where a shipper ceases to be eligible to submit a bid on behalf of a supply point due to a Change of Supplier event or where the AQ of the supply point drops below the minimum criterion for inclusion. This will reduce the likelihood of ineligible submissions and consequent bid rejections.	<ul> <li>cannot be confirmed in less time than 7 days.</li> <li>2. There is no provision in the design to inform shippers that they are no longer registered at a site and therefore should not make a bid. The shipper would be aware of this information via their internal SPA processes, provision of the information would result in an additional file format.</li> <li>If a shipper were to make a bid against a site that they were not registered for, the system would reject it and the shipper would be notified albeit after the bid was made.</li> </ul>
	<ol> <li>SBF File: where a shipper submits a bid for a supply point in the bid window which is accepted as valid and subsequent to this but before the end of the bid window the shipper loses the supply point in a Change of supplier event what happens to the accepted bid? Will the incoming shipper be able to submit and have accepted a bid during the bid window?</li> <li>BIS File: For a supply point against which a bid is selected as successful, but where the supply point changes shipper on a Change of Supplier event between the closure of the bid window and the notification of successful bid award, will the incoming shipper receive the</li> </ol>	<ul> <li>3. If the incoming shipper places a bid during the bid window and the confirmation status of the site has reached CO (by the end of the bid window), it will be considered for acceptance in the selection process and the original bid (from the outgoing shipper) should be rejected.</li> <li>4. Yes, in this scenario both the original shipper who placed the bid, and the incoming shipper will be notified of the successful bid.</li> </ul>

## MP749AE – UKL13829 – DN Interruption - Communication 1 of 1

	notification of successful bid awa 5. Provision of Contract Infor this process is highlighted in the schematic, but there is no detail about prospective changes to fil associated with Change of Supp process. This information is nee assess the total impact of the ch associated with the implementat	<ul> <li>anation:</li> <li>provided</li> <li>provided</li> <li>provided</li> <li>provided</li> <li>provided</li> <li>as such there are no files changes. The shipper uses in the M number screens to ascertain if an M number has an interruptible contract and in the shipper data access screen for contract details. Only the Shippers who are registered for the site or those who are confirming the site are able to view the specific contract details.</li> </ul>
	6. Invoicing: no changes to in are proposed in the suite of prov format changes. Does this mean there will be no invoicing change approval of these will be sought the point of implementation?	ided file that6. The invoicing changes will be addressed in a project stage after the current stage has been completed. Invoicing changes will become
	7. What happens to a succes the end consumer on which the submitted ceases to trade? How changes be transmitted to the sl	bid was will any7. The contract will stay with the site until the contract end date. If the consumer started
	8. Industry testing: as the aud process is the only means to ga to interruption capacity for a sub period and this access is fundan the operation of a number of end consumers' businesses it is esse their continued operation and th	8. An extensive period of testing is planned for this change of which 4 weeks is scheduled for external testing (shipper testing). The first EPS file is due on 1 <sup>st</sup> April 2008, external testing is expected to start at the beginning of February

					credibility of the industry that the auctions progress successfully. Therefore, Shell Gas Direct insist that a period of industry testing of the exchange of files is included in the implementation. We would suggest that a test window be opened 2 months before the issue of the first .EPS file to allow time for testing, resolution of any identified system issues and re-testing of any changed code.	
Npower	Laura Doherty	27/07/07	Reject	YES	In our response to MOD 90, RWE npower raised concerns about the new processes which shippers would have to introduce for a small volume of users. Our review of these file formats has not allayed those concerns.	Your comment is noted, however Ofgem have directed that MOD 90 is to be implemented.
					We are disappointed that we have had only two weeks in which to assess UKL13829 at this point. This is insufficient time, within which we can only complete a very high-level assessment.	xoserve gave a presentation on the impacts of mod proposal 90 at the UK Link Committee on 11 <sup>th</sup> January 2007. The presentation included two possible solution options and formally invited shipper comments on the options and requested a preference. Representation closed out on 26 <sup>th</sup> January 2007 and response of 'no comments' was received from Npower. Furthermore, on 8 <sup>th</sup> February 2007 file definitions that included each file that a shipper were to receive, stating the data item and whether it was mandatory or optional was also circulated. The response to this representation on 23 <sup>rd</sup> February 2007 NPower gave a preference to a manual solution. In defining the solution options Shipper input was sought on a

## MP749AE – UKL13829 – DN Interruption - Communication 1 of 1

		regular basis however it was unworkable to involve all shippers.
	It is expected, however, that the solution proposed by UKL13829 may have significant impacts on internal systems and processes. We are not convinced of the benefits case for the financial expenditure which would naturally result if this proposal went forward. It would have been preferable to have had greater involvement in the development of a solution, as there may have been other, more cost-effective options to consider, rather than being presented with what now appears to be a fait accompli.	Ofgem have directed that MOD 90 is to be implemented. Networks have instructed xoserve to develop an automated solution in order to mitigate the risk that the process would generate a volume of bid activity across the entire community large enough that adequate manual validation would not be possible in the time available. For any individual shipper, the complexity of their systems development would depend on the extent to which they engage in bidding for interruption.
	We are also concerned about the interaction of MOD 90 and MOD 116. Following the recent ruling of the Competition Commission, the future of reforms to the NTS arrangements is uncertain. We believe that this must be resolved before progressing with the implementation of MOD 90.	Your comment is noted, however Ofgem have directed that MOD 90 is to be implemented.
	Whilst we understand the need for reforms to the interruptible arrangements and supported the principle of MOD 90, we do not support the proposed creation of this automated system and do not intend to accept UKL13829.	