

Raising Party	Issue	Comments
All	Unhappy with change marked version released for consultation	<p>The previous consultation on a methodology statement for Option B resulted in an updated version taking on board the comments received, although this was not published as the Authority did not approve the proposals. It was at this stage that we changed the wording around liable parties as there was a fair degree of uncertainty and confusion caused by complexity of the original drafting. It wasn't a change to the methodology but an attempt to clarify the arrangements.</p> <p>We then used the updated unpublished Option B statement as the basis for the Revised Proposals draft methodology statement, but only change marked what was changing as a result of moving from Option B to the Revised Proposals. This is why the removal of the licensable terms was not highlighted. We did include a statement that it was only change marked for the Revised Proposals when we published the drafts for review, but with hindsight we could have made it clearer that the changes following the earlier Option B consultation were included but not change marked.</p>
NGC	Chapter 1: Include reference to 27:73 G:D split and TO specific expansion factors. Clarify that Small Gen subsidy is not part of the methodology.	Revisions to paragraph 1.5 & 1.8
Natural Power	Respondent requests a clear definition of a BCA to confirm if it applies to a BEGA or BELLA. Respondent also request amendment to the flow chart in TN-6 to include references to BELLA.	Add definition of BCA & BEGA to glossary referenced back to Standard Condition C1. Changes to flow chart in TN-6 do not include references to BELLAs as BELLAs do not pay TNUoS or BSUoS. The flow chart is restricted to NGC charging and should not be used as an NGC agreement decision tree.
British Energy	Paragraphs 4.6 and 5.1 which both used to make reference to licences but which now do not.	Reword 5.1 to include licensable and also redefine "licensable generation" in the glossary. Similar changes proposed to paragraphs 4.6 and 4.7. Note that an exemptable generator who has a BEGA will be liable for the "beneficial" payment of negative demand charges will also be liable for the "positive" demand charge if the generator imports over the Triad.
Scottish Power	Paragraph 2.13 states that "the number of zones set for GB is 21", while paragraph 2.20 states that "zones will typically not be reviewed more frequently than once per price control period to provide some stability" but allows for rezoning within the price control period which would be undertaken "in line with the notification process set out in the Transmission Licence". It is unclear whether this implies that rezoning would be through a modification proposal (stating the proposed new zones), which would require 150 days notice, or whether it would be through the notification of final tariffs at the end of January in the relevant year.	<p>Any changes to zones would constitute a change to a charge and not a change to the methodology, and would therefore be subject to the licence and CUSC notice periods and conditions. NGC does not believe it is necessary to change the text in this area.</p> <p>If a mid price control change is appropriate then the change will be localised and limited to minimise the effect. An end of price control change to zones will be a universal change that will be consulted upon as soon as practicable prior to the normal two month notification of final tariffs.</p>
Scottish Power	For improved transparency, the individual expansion factors for the various types of circuit, as referred to in paragraph 2.29, should be given separately from the weighted-averaged expansion factors derived from them, as given in paragraph 2.28.	Agreed - this layout would be consistent with the format adopted by our consultation documents. Paragraphs have been revised

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Scottish Power	Paragraph 2.31 states that "essentially the calculation of [secured] nodal marginal costs is identical to the process outlined above [for the nodal marginal costs in the DCLF model] except that the secure DCLF study increases line capacity where appropriate to ensure intact load flows under the network contingencies". However, the paper issued to and discussed at the DCLF EUG on 3 December 2004 highlighted that the SECULF model calculates nodal marginal costs in a different way to the DCLF model. In any event, we would suggest that this section be updated to incorporate the more detailed information on SECULF contained within that paper, or alternatively that the paper should be included as an appendix to the methodology statement.	Text to be updated to "Essentially the calculation of secured nodal marginal costs is identical to the process outlined above except that the secure DCLF study additionally calculates a nodal marginal cost taking into account the requirement to be secure against a set of worst case contingencies in terms of maximum flow for each circuit. Further information may be found on the Charging Website." Rather than include the detail of how each model works in the methodology statement, we believe it is more appropriate to contain a high level explanation in the statement, with supplementary supporting information provided elsewhere. Such an approach has been used for the DCLF model, with the user guide made available outside of the statement.
Scottish Power	The original rationale for the 27:73 G:D split should be reinstated in paragraph 2.37, and reference made to the fact that this was the split used in the E&W methodology.	Agree that the reference to removing negative demand tariff is erroneous. Replace text with "For the initial GB charging methodology introduced in April 2005, the split has been determined to be 27:73 by the Authority for generation and demand respectively."
Scottish Power	Para 5.1 - The new drafting omits any reference to "licensable generation", does not link the 100MW capacity limit to power stations, BM Units or Trading Units and is generally unsatisfactory. We do not believe that it was necessary to change this drafting for BETTA and we request that the original drafting be reinstated.	See earlier comment above. Note proposed change to remove 100MW is to aid clarity given the complex issues surrounding BEGAs vs BELLAs and transmission connected in Scotland vs England and Wales.
Scottish Power	Appendix TN-5 "Classification parties for charging purposes" has also been significantly revised, and should be reinstated in its original form. The same applies to Appendix TN-6 "Transmission Network Use of System Charging Flowcharts"	Appendices TN-5 and TN-6 are revised to be consistent with the text in Chapter 4 and Chapter 5. They have been revised following the revisions mentioned above.
Scottish Power	We are also concerned to note that NGC has made unmarked changes to paragraph 5.14 regarding the charging of interest on the differential sum of the increased and previous TEC charge when TEC is increased during the charging year. We believe that this is a substantive change to the charging methodology which should only be made following appropriate consultation.	The additional text is not a change to the methodology but is reflecting the existing reconciliation process which is included in the CUSC. The textual change to Statement adds clarity to this process.
Scottish Power	Paragraph 5.10 should also include examples where one of the periods exceeding TEC was covered by STTEC, and where the station is in a positive or negative zone.	The worked example is calculating the chargeable capacity and not calculating a charge. The chargeable capacity for TEC is independent from STTEC and combining these in an example may serve to confuse. Note that the existing example is in the negative charging zones section where the STTEC charge is currently set to zero.
Scottish Power	The glossary should be updated to include definitions in relation to the small generators discount, and paragraph 5.13 should refer to the statement in which the designated sum is specified.	Glossary to be updated but referring to SLC C13. Also refer to designated sum in statement of charges
Scottish Power	The proposals in relation to application fees for GB remain unclear pending publication of a draft Statement of Use of System Charges.	The Statement of Charges will be published once the methodology statements have been approved and the TO charges for GB is also approved.