

4.3 CP Form

Change Proposal – BSCP40/02	CP No: 74-B <i>Version No: 1.0</i> <i>(mandatory by BSCCo)</i>
Title (mandatory by originator) Improving the format of BSCP11 forms.	
Description of Problem/Issue (mandatory by originator)	

The Disputes process is a way for Balancing and Settlement Code (BSC) Parties to correct errors in Settlement that have affected Trading Charges, however the information that Parties enter into [BSC Procedure \(BSCP\) 11 'Trading Disputes'](#) forms (from 6.1 to 6.7 in particular) is not sufficient for ELEXON to progress a Trading Dispute efficiently.

This results in members of ELEXON's Disputes and Compliance team having to return to Parties and prompt them for the additional information that they require.

Additionally, BSCP11 contains several examples of unnecessary, redundant or incorrect wording and formatting that hinder the process and create confusion for BSC Parties:

- 6.1 BSCP11/01 – this form is used to raise a Trading Dispute. Quite often, Parties do not provide sufficient details with regards to the error/issue they are raising the Trading Dispute against because they are not prompted to do so.
- 6.2 BSCP11/02 – this form is issued to confirm receipt of the BSCP11/01 form and the assigned reference number of the Trading Dispute raised. Other than that, it does not serve any useful purpose and so is an unnecessary piece of paperwork.
- 6.3 BSCP11/03 – this form is used by the Trading Disputes team to request information from Parties who raised a Trading Dispute. The Raising Party is required to fill in their response in the lower section of the form, and send it back to the Trading Disputes team. The lower section of the form is unnecessary, as most Parties provide their response in an email anyway.
- 6.4 BSCP11/04 – this form is used to inform Parties of the Trading Disputes team's assessment against the Trading Disputes criteria set out in BSC Section W 'Trading Disputes'
 - The wording in criterion a) under the 'Summary of DS Response' table reads "All affected Settlement Periods claimed..." however this does not match the wording in BSCP11 5.1.6 "some or all affected Settlement Periods claimed..."
 - Criterion a) does not take into account that the TDC can exercise its discretion to waive the requirement that the Trading Dispute should be raised within the Dispute Deadline (as described in BSCP11 2.2).
 - The wording "If objections to this finding are received from the Raising Party or any affected Party within 10 Working Days..." in option ii) does not match the wording in BSCP11 5.1.8 "objection to the BSCCo's findings within 14 days..."
 - Option iii) of the 'Delete as appropriate' section further down the page states "The BSCCo has not validated the Trading Dispute..." however this never applies in practice. ELEXON has always validated every Trading Dispute raised.
- 6.7 BSCP11/07 – This form is used to inform the Raising Party and affected Parties of the TDC's decision on a Trading Dispute. The current form BSCP11/07 was designed only for the Raising Party but there isn't a version for affected Parties.

Proposed Solution (mandatory by originator)

To amend BSCP11 to remove unnecessary, redundant or incorrect wording and formatting, and to amend the form to allow the capture of key information at the earliest instance:

- Include a new questionnaire in BSCP11/01 that captures crucial information including the type of error leading to the Trading Dispute (e.g. System Prices/CVA Metering Systems), who identified the error and how it was identified, what caused the error to occur, what actions have been taken so far to correct the error and if any correction has been made in the fluid period (SF-RF) with a prompt to specify the range of Settlement Days and Settlement Periods already corrected. Raising Parties will additionally be required to provide the uncorrected data, the proposed replacement data, a statement explaining why exceptional circumstances exist and commissioning records for installed Metering Equipment. This information will allow ELEXON to progress a Trading Dispute efficiently.
- Remove BSCP11/02 entirely, and add a sentence stating “This form is no longer used and is intentionally left blank”. The Trading Disputes team will directly contact the Raising Party via email to confirm receipt of BSCP11/01 form and issue the Trading Disputes reference number.
- Amend the lower section of BSCP11/03, removing everything following the text beginning Respond By Date: __/__/__.
- Amend the wording in BSCP11/04 option i) that reads “The Trading Dispute is considered valid against checks a), b) and c) above. The Trading Dispute will be presented to the TDC for verification that all affected Settlement Periods claimed have been raised within the applicable Trading Dispute Deadline and that a Settlement Error exists. Subject to TDC approval, the BSCCo will instruct rectification of the error” to “The Trading Dispute is considered valid against checks a), b) and c) above. The Trading Dispute will be presented to the TDC for consideration. Subject to TDC approval, the BSCCo will instruct rectification of the error”.
- Amend the wording in BSCP11/04 option ii) that reads “within 10 Working Days of receipt of this form” to “within 14 days of receipt of this form”.
- Remove “The BSCCo has not validated the Trading Dispute..” from BSCP11/04 Option iii).
- Create two versions of BSCP11/07, split as BSCP11/07 Part A and Part B, for the Raising Party and affected Parties respectively and populated by the Disputes Secretary. Parts A and B will require Details of Authorised Data Amendments to be entered including options (to be deleted as appropriate) for the Applicable Settlement Run(s) through which corrective action is to be applied and the type of corrective action to be applied. Part A will exclusively require population of fields requiring the Party’s MSID/BM Unit/ECVN or MVRN Authorisation ID/Other IDs and the deadline to confirm with the Disputes Secretary that corrective action has been implemented and the applicable Settlement Run(s) has been scheduled. The Details of Authorised Data Amendments for Part B will be non-confidential, while the Details of Authorised Data Amendments for Part A will be confidential.

Justification for Change (mandatory by originator)

To create greater clarity for BSC Parties and improve submission quality and reduce delays resulting from unnecessary workload for ELEXON, thus allowing a Trading Dispute to be progressed in a timelier manner.

To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code? (mandatory by originator)

BSC Section W 'Trading Disputes'.

Estimated Implementation Costs (mandatory by BSCCo)

£240 (one ELEXON man day) to implement the necessary BSCP11 changes.

Configurable Items Affected by Proposed Solution(s) (mandatory by originator)

BSCP11 'Trading Disputes'.

Impact on Core Industry Documents or System Operator-Transmission Owner Code (mandatory by originator)

As a change to how BSC Parties submit Trading Disputes using an ELEXON form, other industry codes will not be impacted.

Related Changes and/or Projects (mandatory by BSCCo)

None.

Requested Implementation Date (mandatory by originator)

01 June 2019 as part of ELEXON's June 2019 Release.

Reason:

This is the next available BSC Release that can include this CP.

Version History (mandatory by BSCCo)

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Attachments: Y – Proposed redlining changes

(delete as appropriate)