

CP Progression Paper

Creation of a new BSC Procedure (BSCP) for Assurance Information Requests (AIRs)

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About This Document



Not sure where to start? We suggest reading the following sections:

- Have 5 mins? Read section 1
- Have 15 mins? Read sections 1, 4, 5 and 6
- Have 30 mins? Read all sections
- Have longer? Read all sections and the annexes and attachments
- *You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary](#)*

This document provides information on a new Change Proposal (CP) and outlines our proposed progression timetable for this change, including when it will be issued for CP Consultation in the next suitable Change Proposal Circular (CPC) batch. We are presenting this paper to the Panel on 14 July 2022 to capture any comments or questions from Panel Members on this CP before we issue it for consultation.

We are using the CP process, a mechanism that industry is familiar with, to carry out the consultation on establishing a new BSCP. In accordance with BSC Section F, the Panel may establish a new Code Subsidiary Document (CSD) following consultation with industry.

There are 3 parts to this document:

- This is the main document. It provides a summary of the solution, impacts, anticipated costs, and proposed implementation approach, as well as our proposed progression approach for this CP.
- Attachment A contains the CP proposal form.



Committee

BSC Panel



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- Attachment B contains the proposed redlined changes to deliver the CP solution.

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1. Summary

Why change?

The Assurance Information Request (AIR) is a Performance Assurance Technique (PAT) which was introduced in May 2022. Currently there is no related BSCP for an AIR, therefore when issuing an AIR, there is no written obligation on Parties to adhere to the request.

Solution

This CP seeks to create a new BSCP, outlining the obligations and processes required to carry out an AIR.

Impacts and costs

This CP will impact all Performance Assurance Parties (PAPs)¹.

This CP is not expected to incur any costs to industry as it is a document only change. The cost of amending these documents is expected to be <£1k.

Implementation

This CP is recommended for implementation on 3 November 2022 as part of the standard November 2022 BSC Release.

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¹ A PAP is a Supplier, a Virtual Lead Party, Meter Operator Agent, Data Collector, Data Aggregator, Meter Administrator, Licensed Distribution System Operator and/or a Registrant.

2. Why Change?

What is the issue?

Currently there is no related BSCP for an Assurance Information Request (AIR). Therefore when issuing an AIR, there is no written obligation on Parties to adhere to the request. The AIR is only useful as a Performance Assurance Technique (PAT) if Parties are obligated to follow it and if the associated processes are clear. Therefore a BSCP is required to outline the processes and obligations on PAPs.

Background

The [Performance Assurance Framework](#)² (PAF) is a complementary set of preventive, detective, incentive and remedial assurance techniques. These PATs are used flexibly to address Settlement Risks. A Settlement Risk is anything that could pose a risk to the accuracy of Settlement: it could be a failure in a process or an error in data. The PATs must address risks to Settlement and the impact of actual failures or errors in Settlement.

The AIR was introduced into the PAF following approval by the PAB in May 2022 ([PAB256/05](#)³). Currently if Elexon requires information to assist with the assessment of a Risk or to gain more information before deploying one of the other Performance Assurance Techniques (PATs), a Performance Assurance Party (PAP) it is not obligated to provide a response. Instead Elexon can only deploy one of the more intensive techniques that hold BSCP obligations such as the Technical Assurance of Assurance Parties (TAPAP) technique to mandate this engagement.

There is an inconsistency between the AIR being included in the PAF but not having a related BSCP detailing the process that PAPs and Elexon will follow.

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² <https://www.elexon.co.uk/reference/performance-assurance/>

³ <https://www.elexon.co.uk/meeting/pab256/>

Proposed solution

This CP will create a BSCP document that contains obligations and timescales for PAPs to respond to an AIR. The BSCP will reflect similar procedures to that of [BSCP535 'Technical Assurance'](#)⁴ but will be much less resource intensive. It will detail the following;

- The context of the technique within the PAF
- How the scope of work is determined
- Notification timescales for deployment of the technique
- Response timescales
- Required actions
- Required content of responses between the Delegated Authority and the PAP
- PAB reporting

The term 'Delegated Authority' has been used for the role Elexon will normally take in this process. It will mirror that of BSCP535 and enable the flexibility to resource this work to a body that has been approved by the PAB. If BSCCo or the Performance Assurance Administrator (PAA) is used, then this work could only be done by Elexon.

Proposer's rationale

An AIR is distinguishable by name as an Assurance tool and part of the PAF, rather than the Requests for Information (RFI) that are provided to industry for other Elexon processes such as with CPs and Modifications.

It is to be used as a form of assessment and a detective technique to gain an understanding of how a certain process or Party operates. The PAB can decide to apply this technique to a single or sub set group of PAPs, because of performance related issues, Settlement error, information provided by its sub-committees or the Panel or to gain an understanding of a particular Settlement Risk. The received information can then be used to make further risk management decisions for further analysis, or provide support to or for the deployment of any of the other PATs.

The creation of obligations and timescales for a detective technique that facilitates a request for information will provide a more efficient way of requesting information without the need for deploying one of the more intensive techniques. This will enable the PAF to deliver assurance in a way that other techniques are currently not able to. The AIR technique can be deployed quickly and will be less resource intensive than the other detective techniques while still providing tangible results. It will complement the rest of the PAF by enabling Elexon to obtain vital information to enable further risk management assessments and determinations.

The new BSCP is required to define the process that will be followed in relation to the AIR, providing PAPs with clarity on their obligations and associated timescales.

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⁴ <https://www.elexon.co.uk/csd/bscp535-technical-assurance/>

Proposed redlining

The proposed redlining for the creation of a new BSCP can be found in Attachment B of this paper.

4. Impacts and Costs

BSC Party & Party Agent impacts and costs

BSC Party & Party Agent Impacts

BSC Party/Party Agent	Impact
All PAPs	Low

Central impacts and costs

Central impacts

This CP will require a creation of a new BSCP. There will not be any central system impacts.

Central Impacts

Document Impacts	System Impacts
• BSCP605 'Assurance Information Request'	• N/A

Impact on BSC Settlement Risks

Impact on BSC Settlement Risks

We would expect a generic positive impact on all BSC Settlement Risks from this CP as this formalises and clarifies the obligations for a new PAT, which the PAB can then deploy within the PAF.

Central costs

The central implementation costs for this CP will be approximately <£1k.

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5. Implementation Approach

Recommended Implementation Date

This CP is recommended for implementation on 3 November 2022 as part of the standard November 2022 BSC Release.

The rationale for aiming for this, the earliest available release, is so that we can realise the anticipated benefits to our customers as soon as possible.

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6. Proposed Progression

Progression timetable

The table below outlines the proposed progression plan for this CP:

Progression Timetable	
Event	Date
CP Progression Paper presented to Panel for information	14 July 2022
CP Consultation	8 August 2022 – 7 September 2022
CP Assessment Report presented to Panel for decision	8 September 2022
Proposed Implementation Date	3 November 2022 (November 2022 Release)

CP Consultation questions

We intend to ask the standard CP Consultation questions for this CP. We do not believe any additional questions need to be asked for this CP.

Standard CP Consultation Questions
Do you agree with the CP proposed solution?
Do you agree that the draft redlining delivers the CP proposed solution?
Will this CP impact your organisation?
Will your organisation incur any costs in implementing this CP?
Do you agree with the proposed implementation approach for this CP?

7. Recommendations

We invite you to:

- **NOTE** the proposed progression timetable for the CP; and
- **PROVIDE** any comments or additional questions for inclusion in the CP Consultation.