

CP Progression Paper

Allow non-BSC Parties to raise Change Proposals, add a CP withdrawal process and remove BCA/PACA concept

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About This Document

You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary¹](#).

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 SVG on 1 August 2023 and the ISG on 1 August 2023 to capture any comments or questions from Committee Members on this CP before we issue it for consultation.

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



Committee

Imbalance Settlement Group (ISG) and Supplier Volume Allocation Group (SVG)



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¹ <https://www.elxon.co.uk/glossary/?show=all>



Not sure where to start?

We suggest reading the following sections:

- Have 5 minutes?
Read section 1
- Have 15 minutes?
Read sections 1, 4, 5 and 6
- Have 30 minutes?
Read all sections
- Have longer? Read all sections and the annexes and attachments

Why change?

The fact that non-BSC Parties are unable to propose Change Proposals (CPs) could be viewed as contradictory within the BSC framework, particularly given that these non-Parties have the ability to propose Modifications under the supervision and approval of the Panel.

Furthermore, there is no formalised procedure in place to withdraw a CP, which doesn't align with the existing capability to retract Modifications.

[BSC Procedure \(BSCP\) 40 'Change Management'](#)² also contains references to a process which requires a Party or Party agent to nominate a BSC Change Representative known as a Party Agent Change Administrator (PACA) and BSC Change Administrator (BCA). This process has not been used in at least a decade.

[The Issue 102 'BSC Change Process Review'](#)³ group recommends the introduction of these changes in BSCP 40.

Solution

The aim of this CP is to equip non-BSC Parties with a straightforward, user-friendly, and effective procedure for initiating and owning a CP.

Additionally this CP seeks to add a withdrawal process to BSCP40 'Change Management', clarifying at which point the CP can be withdrawn, and by whom. The guiding principle is to follow the same process and approach used for Modifications.

This CP also replaces the processes related to the PACA and BCA with references to the BSC Change Distribution List and BSC Release Distribution List.

Impacts and costs

This CP will positively impact any non-BSC party that intends on raising or any party that wishes to withdraw a CP.

This CP will require changes to BSCP40 'Change Management'. The central implementation cost will be less than £1k to implement the relevant document changes. No BSC central systems changes are anticipated.

Implementation

This CP is proposed for implementation on 29 February 2024 as part of the February 2024 Standard BSC Release.

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² <https://bscdocs.elexon.co.uk/bsc-procedures/bscp-40-change-management>

³ <https://www.elexon.co.uk/smg-issue/issue-102/>

2. Why Change?

What is the issue?

Presently, non-BSC Parties are not permitted to propose CPs. The Issue 102 group viewed this constraint as non-consistent within the BSC framework considering that these non-Parties are authorised to raise and progress Modifications with the Panel's approval and oversight.

The impact from these restrictions is that some non-BSC Parties, who are familiar and have strong working knowledge and experience with BSC processes (such as Party Agents), are precluded from raising CPs. As a result, their ability to contribute to and drive industry change, especially in areas where they possess significant expertise, is significantly diminished.

Moreover, as it stands, there is no method for a Proposer to withdraw their CP. This stands in contrast to the fact that Modifications can indeed be withdrawn, representing an inconsistency between the two types of BSC Changes that could be confusing for the industry and should be simplified. The Issue 102 group is supportive of the introduction of such a feature into BSCP40 'Change Management'. Implementation of this change would allow for CPs to be withdrawn in any situation, such as where they no longer hold relevance, or if the Proposer chooses to relinquish their lead on the proposed change. It's also worth noting that in some cases, the costs associated with a CP may surpass its anticipated benefits, reinforcing the necessity of a mechanism for withdrawing a CP if this is the most appropriate route to take.

Some time ago, BSC Parties and Party Agents nominated individuals (BCA or PACA) to interface with Elexon on all change issues. This appointment is something that has not been actioned in at least ten years, and therefore the references to it in BSCP40 are redundant.

Background

This CP originates from Issue 102, and has the principle focus to implement Issue 102 Improvement #1 - Allow non-BSC Parties to raise Change Proposals; and Improvement #2 - Align CP process to Modifications process, to allow Proposers to withdraw CPs.

The BCA/PACA process does not reflect current practices. As of right now, the communications about changes are shared with the Change Distribution List or BSC Release Distribution List, depending on relevance. Removing the BCA/PACA references will bring BSCP40 into modern day practice, removing no longer relevant references.

Issue 102 Discussions

After a stakeholder survey, carried out in January and February of 2022, on the merits of a BSC Change process review conducted by Elexon, its results were then presented in summary at the June 2022 Panel. The Panel then agreed that Issue 102 'BSC Change Process review' should be raised.

The Issue Group conducted a review of the BSC Change process with the goal of discovering potential methods to address critical issues or to enhance the efficacy of the BSC Change Process itself.

It was also agreed in the Issue Group that any solutions developed by the Issue Group would achieve at least one of the following:

- Speed up the BSC Change Process;

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- Simplify the BSC Change Process;
- Improve quality of BSC Change solutions and reports

Process for non-BSC Parties to raise Modifications

Non-BSC Parties are able to raise Modifications but they cannot raise CPs. This presents inconsistencies within the Change process.

[The process for a non-BSC Party to raise a Modification⁴](#) requires their request to be designated as a third Party Proposer by the BSC Panel. In order to submit a Designation application, the non-BSC Party must complete the following three documents:

- A Designation Request Form – provides details of designation request, including why they want to amend the BSC
- A Modification Proposal Form – provides details of the change they are seeking to make to the BSC
- A Third Party Applicant Letter – confirms their rights and obligations under the BSC

Desired outcome

The Issue 102 group wish for Elexon to align and simplify the BSC Change process via a change to BSCP40.

⁴ <https://www.elexon.co.uk/change/raising-bsc-change-non-bsc-party/>

3. Solution

Proposed solution

The primary aim when interacting with BSC Parties is to facilitate a straightforward, clear, and efficient method for initiating a CP. This CP seeks to extend that process to non-BSC Parties, with appropriate checks and balances.

1. The process begins with the submission of a completed CP form to Elexon and post validation, resulting in the progression of the change. However, Elexon reserves the right to make the final decision.
2. If Elexon concludes it's not suitable to progress the CP, the Proposer will be informed about this decision and the reasons behind it. Should the Proposer dispute Elexon's decision, a written appeal can be lodged.
3. This appeal is then reviewed by the Panel Committee, and the final decision is communicated back to Elexon and the relevant party.

Additionally, this CP plans to integrate a withdrawal process into BSCP40 'Change Management', necessitating alterations to parts of section 3.4.

1. This would permit CPs to be retracted in any given circumstance, for instance, when they've lost their relevance, or if the Proposer decides to withdraw from leading the proposed change. It's important to remember that there could be situations where the expenses tied to a CP may outweigh its projected benefits.
2. Upon receipt of this message, Elexon is responsible for informing the Panel Committee and all BSC Parties about the withdrawal of the CP. This information will be disseminated as quickly as possible to maintain transparency and efficiency within the BSC process.
3. The withdrawn CP will remain open for a 5 working day window for adoption. During which, any interested Party or Party Agent may adopt the CP by notifying Elexon and the adopted CP shall continue from the point at which it was withdrawn.

In regards to the PCA/BACA references, the solution currently looks to replace these references with references to the distribution list. These lists will be either the Change Distribution List or BSC Release Distribution List, depending on relevance.

Proposer's rationale

As the energy market continues to evolve, the Issue 102 group recognised the increasingly complex roles of non-BSC Parties, such as Party Agents, who often possess in-depth knowledge and expertise about specific aspects of BSC processes. Their ability to propose CPs would not only bring about increased flexibility and diversity of perspectives into the BSC change process but also promote fairness and equity among all stakeholders.

Further, in light of the dynamic nature of the energy market, the Issue 102 group believe it necessary to implement a CP withdrawal process. This would streamline operations, optimise resource use and ultimately contribute to a more transparent and accountable BSC framework that is consistent between Modification and CP processes for change.

The distribution lists have been in place for a considerable amount of time and reflect Elexon's current, modern practices on interfacing Change Issues with market participants and BSC Parties. The appointments of BCA/PACAs has not been done in at least a decade. Therefore the references to them within BSCP40 are no longer required.

Proposed redlining

The CP proposes to update BSCP40 'Change Management'. The redlining to support this change can be found in Attachment B.

4. Impacts and Costs

BSC Party & Party Agent impacts and costs

This CP is expected to have a positive impact on any BSC Party or Party Agents.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Any	To allow them the opportunity to formally raise a CP or withdraw a CP at an appropriate time should they wish to do so.

Central impacts and costs

Central impacts

The solution in this CP only affects BSC documentation, specifically BSCP40. No BSC Central Systems or Agents will be impacted.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP40 'Change Management'	<ul style="list-style-type: none">None

Impact on BSC Settlement Risks

Impact on BSC Settlement Risks
None

Central costs

The central implementation costs for this CP will be less than £1K.

5. Implementation Approach

Recommended Implementation Date

This CP is recommended for implementation on 29 February 2024 as part of the standard February 2024 BSC Release.

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 ISG for information	1 August 2023
CP Progression Paper presented to SVG for information	1 August 2023
CP Consultation	7 August 2023 – 4 September 2023
CP Assessment Report presented to ISG for decision	3 October 2023
CP Assessment Report presented to SVG for decision	3 October 2023
Proposed Implementation Date	29 February 2024 (February 2024 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 proposed solution?
Do you agree that the draft redlining delivers the 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;
- **PROVIDE** any comments or additional questions for inclusion in the CP Consultation; and
- **NOTE** that this CP will be presented to:
 - the ISG on 1 August 2023; and
 - the SVG on 1 August 2023.