

# Initial Written Assessment

ELEXON

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

## ‘Housekeeping and updating BSC references to “Consumer Scotland”, “Generation Curtailment Validation Committee” and “GCVC”’

This housekeeping Modification proposes to replace any references to “Citizens Advice Scotland” with “Consumer Scotland”. It also proposes to replace any references to “Network Gas Supply Emergency Settlement Validation Committee” and “NGSESVC” to “Generation Curtailment Validation Committee” and “GCVC”. Additionally, it also proposes to correct 5 non-material errors and inconsistencies across 5 Sections of the Balancing and Settlement Code (BSC).



Elxon recommends the Panel raises the attached Modification Proposal in accordance with the provisions of Section F - Modification Procedures F2.1.1 (d) (iv)



Elxon recommends this Modification is progressed as a Fast Track Self-Governance Modification (a housekeeping Modification) and should be approved



Elxon does not consider that this Modification impacts the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC

This Modification is expected to impact:

- Elxon

XXX/XX

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## About This Document

You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary](#)<sup>1</sup>.

This document is a recommendation to the Balancing and Settlement Code (BSC) Panel to raise a Modification Proposal (Attachment A) in accordance with [BSC Section F2.1.1\(d\)](#) (iv)<sup>2</sup>

Elexon will present this paper to the Panel on 9 November 2023. If the Panel agrees to raise the Modification Proposal:

- the Panel will consider the recommendations and agree how to progress this Modification;
- this document will form the Initial Written Assessment (IWA); and
- The Proposal Form will be updated and published on the Elexon website accordingly.

There are 3 parts to this document:

- This is the main document. It provides details of the Modification Proposal, an assessment of the potential impacts and a recommendation of how the Modification should progress.
- Attachment A contains the Proposal Form.
- Attachment B contains the draft redlined changes to the BSC.



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### 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.

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

<sup>2</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures> - The Panel may modify the Code “on the recommendation of BSCCo to rectify manifest errors in or to correct minor inconsistencies (or make other minor consequential changes) to the Code”

## Why change?

The Scottish government have created a new non-ministerial office (Consumer Scotland) following the passage of the [Consumer Scotland Act 2020](#)<sup>3</sup>, to act as a voice for consumers in Scotland. Though Citizens Advice Scotland still exists, the new Consumer Scotland has taken the seat formerly held by Citizens Advice Scotland on the BSC Panel. As such, the BSC needs to be amended to change any references to “Citizens Advice Scotland” to “Consumer Scotland”. This Modification will bring the BSC in line with changes made to Section C3 of the [Electricity Transmission Licence](#)<sup>4</sup> in 2022.

Also, Elexon (with oversight from the Imbalance Settlement Group (ISG)) amended the name of the Network Gas Supply Emergency Settlement Validation Committee (NGSESVC) to the Generation Curtailment Validation Committee (GCVC) with [CP1581 ‘Recommendation to update BSCP18 following Issue 105’](#)<sup>5</sup>. This Modification will bring Section B of the BSC in line with [CP1581 ‘Recommendation to update BSCP18 following Issue 105’](#)<sup>6</sup>.

Furthermore, Elexon has identified a total of 5 minor errors and inconsistencies across 5 Sections of the BSC. Such errors are identified in the Code from time to time and are recorded by Elexon to be addressed at an appropriate time in the future. These errors, although minor, may affect the reading of the Code.

## Solution

This Modification proposes a total of 10 non-material housekeeping changes to the Code. Due to the minor and non-material nature of the proposed changes, these have been combined into a single Modification Proposal for efficiency.

## Impacts and costs

As all of the changes proposed under this Modification are minor housekeeping changes, there will be no material impacts on any existing Core Industry Documents, BSC Systems, BSC Parties, consumers or the environment.

The estimated cost to amend the BSC Sections is expected to be under £5k. No ongoing costs are expected.

## Implementation

Elexon recommends that this Modification is implemented on 29 February 2024 as part of the February 2024 standard BSC Release, as this is the most efficient Release to target.

<sup>3</sup> <https://www.legislation.gov.uk/asp/2020/11/contents/enacted>

<sup>4</sup> <https://www.ofgem.gov.uk/sites/default/files/2023-03/Electricity%20Transmission%20Consolidated%20Standard%20Licence%20Conditions%20-%20Current.pdf>

<sup>5</sup> <https://www.elexon.co.uk/change-proposal/cp1581/>

<sup>6</sup> <https://www.elexon.co.uk/change-proposal/cp1581/>

## Recommendation

Elxon recommend the Panel raise this Modification Proposal as it will rectify manifest errors and correct minor inconsistencies to the BSC. Should the Panel agree to raise the Modification, we recommend that this Modification progress as a Fast Track Self-Governance Modification, as we believe it meets the Fast Track Self-Governance Criteria.

Please note that in order for a Modification Proposal to progress as a Fast Track Self-Governance Modification Proposal the Panel must unanimously agree to this progression route.

### What is the issue?

The Scottish government have created Consumer Scotland, a new non-ministerial office following the passage of the Consumer Scotland Act 2020, to act as a voice for consumers in Scotland. Though Citizens Advice Scotland still exists, the new Consumer Scotland has taken the seat formerly held by Citizens Advice Scotland on the BSC Panel. As such, the BSC needs to be updated to change any references to “Citizens Advice Scotland” to “Consumer Scotland”. This Modification will bring the BSC in line with changes made to Section C3 of the [Electricity Transmission Licence](#)<sup>7</sup> in 2022.

Additionally, Elexon (with oversight from the Panel) amended the name of the Network Gas Supply Emergency Settlement Validation Committee (NGSESVC) to the Generation Curtailment Validation Committee (GCVC) with [CP1581 ‘Recommendation to update BSCP18 following Issue 105’](#)<sup>8</sup> on the basis that this offers a more customer-friendly and less cumbersome way for the committee to be referenced and interacted with by the industry. This Modification will bring Section B of the BSC in line with [CP1581 ‘Recommendation to update BSCP18 following Issue 105’](#)<sup>9</sup>

Furthermore, Elexon has identified a total of 5 minor errors and inconsistencies across 5 Sections of the BSC. Such errors are identified in the Code from time to time and are recorded by Elexon to be addressed at an appropriate time in the future. These errors, although minor, may affect the reading of the Code.

### Background

Consumer Scotland are a new organisation, and the Generation Curtailment Validation Committee is a new name for an existing Committee. Therefore, their names are not currently reflected in the BSC, which reduces the accuracy of the Code.

Also, minor errors are identified in the Code from time to time and are recorded by Elexon to be addressed at an appropriate time in the future. These errors, although minor, may affect the reading of the Code.

### Desired outcomes

Under BSC [Section F ‘Modification Procedures’](#)<sup>10</sup> 2.1.1(d) (iv), Elexon can recommend a Modification Proposal to the Panel to rectify manifest errors, to correct minor inconsistencies and/or make other consequential changes to the Code

This Modification proposes a total of 10 non-material housekeeping changes to the Code.

Due to the minor and non-material nature of the proposed changes, these have been combined into a single Modification Proposal for efficiency.

<sup>7</sup> <https://www.ofgem.gov.uk/sites/default/files/2023-03/Electricity%20Transmission%20Consolidated%20Standard%20Licence%20Conditions%20-%20Current.pdf>

<sup>8</sup> <https://www.elexon.co.uk/change-proposal/cp1581/>

<sup>9</sup> <https://www.elexon.co.uk/change-proposal/cp1581/>

<sup>10</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures> - The Panel may modify the Code “on the recommendation of BSCCo to rectify manifest errors in or to correct minor inconsistencies (or make other minor consequential changes) to the Code”

## Proposed solution

Under BSC [Section F 'Modification Procedures'](#)<sup>11</sup> 2.1.1(d) (iv), Elexon can recommend a Modification Proposal to the Panel to rectify manifest errors, to correct minor inconsistencies and/or make other consequential changes to the Code.

This Modification proposes a total of 10 non-material housekeeping changes to the Code. Due to the minor and non-material nature of the proposed changes, these have been combined into a single Modification Proposal for efficiency.

Section B shall be amended as follows:

### [BSC Section B 'The Panel'](#)<sup>12</sup>

- “1.1 Establishment and composition”, changing “Citizens Advice Scotland” to “Consumer Scotland”.
- “2.3 Appointment of Panel Members by Citizens Advice or Citizens Advice Scotland”, changing “Citizens Advice Scotland” to “Consumer Scotland” in both the title and the subtext.
- “3.6 Network Gas Supply Emergency Settlement Validation Committee”, changing “Network Gas Supply Emergency Settlement Validation Committee” to “Generation Curtailment Validation Committee”
- “3.6.1 Network Gas Supply Emergency Settlement Validation Committee”, changing “Network Gas Supply Emergency Settlement Validation Committee” to “Generation Curtailment Validation Committee(s)”.
- B4.6.1(f) correcting “Chai” to “Chair”.

Section F shall be amended as follows:

### [BSC Section F 'Modification Procedures'](#)<sup>13</sup>

- “2.1 Modification Proposals”, changing “Citizens Advice Scotland” to “Consumer Scotland” (two instances).

Section L shall be amended as follows:

### [BSC Section L 'Metering'](#)<sup>14</sup>

- 2.3.2A, correcting reference to “paragraph 2.1.1(a)” to “paragraph 2.1.3(a)”.

Section T shall be amended as follows:

### [BSC Section T 'Settlement and Trading Charges'](#)<sup>15</sup>

- 4.3B.3, correcting “VBMUSDV<sub>ijj2</sub>” to “VBMUSDV<sub>i2ji</sub>”.

Section X-1 shall be amended as follows:

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<sup>11</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures>

<sup>12</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-b-the-panel>

<sup>13</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures>

<sup>14</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-l-metering>

<sup>15</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-t-settlement-and-trading-charges>

## BSC Section X-1 'General Glossary'<sup>16</sup>

- for the definition of “External System”, correcting the definition by removing “; except that during the Transition Period: means an electricity transmission system or electricity distribution system which is outside the area covered by the Total System and is electrically linked to a System;”.

Section Z shall be amended as follows:

## BSC Section Z 'Performance Assurance'<sup>17</sup>

- “2.1 Panel Committee”, changing “Citizens Advice Scotland” to “Consumer Scotland”.

Housekeeping justification	
Section B, 1.1	This is updating a name of an organisation, which falls under Fast Track Self-Governance criteria.
Section B, 2.3	This is updating a name of an organisation, which falls under Fast Track Self-Governance criteria.
Section B, 3.6	This is updating a name of a committee, which falls under Fast Track Self-Governance criteria.
Section B, 3.6.1	This is updating a name of a committee, which falls under Fast Track Self-Governance criteria.
Section B, B4.6.1(f)	This is correcting a minor spelling mistake, which falls under Fast Track Self-Governance criteria.
Section F, 2.1	This is updating a name of an organisation, which falls under Fast Track Self-Governance criteria.
Section L, 2.3.2A	This is correcting a typographical and referencing mistake, which falls under Fast Track Self-Governance criteria.
Section T, 4.3B.3	This is correcting a typographical mistake, which falls under Fast Track Self-Governance criteria.
Section X-1	This is correcting a definition, which falls under Fast Track Self-Governance criteria.
Section Z, 2.1	This is updating a name of an organisation, which falls under Fast Track Self-Governance criteria.

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The draft BSC legal text can be found in **Attachment B**.

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<sup>16</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-x-1-general-glossary>

<sup>17</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-z-performance-assurance>

## Benefits

The correction of minor typographical, formatting, referencing, and consistency errors in the BSC improves clarity and reduces the potential for misinterpretation of the Code. This helps to ensure that visitors to the Code receive a smooth and effective user experience.

## Applicable BSC Objectives

This Modification will better support Applicable BSC Objective (d) as it will promote efficiency in the implementation of the balancing and Settlement arrangements by correcting minor errors and inconsistencies, which will make the reading and interpretation of the BSC easier.

## Implementation approach

Elxon recommends that this Modification is implemented on 29 February 2024 as part of the February 2024 standard BSC Release.

This is the next available standard BSC release, which would be the most efficient way to implement this change.



### What are the Applicable BSC Objectives?

- (a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence
- (b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System
- (c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity
- (d) Promoting efficiency in the implementation of the balancing and settlement arrangements
- (e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]
- (f) Implementing and administering the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation
- (g) Compliance with the Transmission Losses Principle

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## 4 Impacts and costs

As all of the changes proposed under this Modification are minor housekeeping changes, there will be no material impacts on any existing Core Industry Documents, BSC Systems, BSC Parties, consumers or the environment.

### Impact on BSCCo

This Modification will be a document only change to update 6 Sections of the BSC. The estimated cost to amend the BSC Sections is expected to be under £5k. No ongoing costs are expected.

### Impact on EBGL Article 18 terms and conditions

Non-material housekeeping changes are exempt from the EBGL change process (in accordance with the Self-Governance Criteria).

### Impact on a Significant Code Review (SCR) or other significant industry change projects

We believe this proposal should be treated as a SCR Exempt Modification Proposal, as it has no material impact on any open SCRs. At the time of writing, we are waiting to hear from Ofgem whether they agree with this or not.



#### What are the consumer benefit areas?

- 1) Will this change mean that the energy system can operate more safely and reliably now and in the future in a way that benefits end consumers?
- 2) Will this change lower consumers' bills by controlling, reducing, and optimising spend, for example on balancing and operating the system?
- 3) Will this proposal support:
  - i) new providers and technologies?
  - ii) a move to hydrogen or lower greenhouse gases?
  - iii) the journey toward statutory net-zero targets?
  - iv) decarbonisation?
- 4) Will this change improve the quality of service for some or all end consumers. Improved service quality ultimately benefits the end consumer due to interactions in the value chains across the industry being more seamless, efficient and effective.
- 5) Are there any other identified changes to society, such as jobs or the economy.

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## 5 Proposed Progression

This IWA will be presented to the BSC Panel at its meeting on 09 November 2023, where we will invite the Panel to raise this Modification under [Section F 2.1.1\(d\) \(iv\)](#)<sup>18</sup> – as we believe it will rectify manifest errors and correct minor inconsistencies to the BSC.

Under [Section F ‘Modification Procedures’](#)<sup>19</sup> 2.1.1(d) (iv), Elexon can recommend a Modification Proposal to the Panel to rectify manifest errors, to correct minor inconsistencies and/or make other consequential changes to the Code.

Should the Panel agree to raise this proposal, Elexon recommends that this Modification should progress as a **Fast Track Self-Governance Modification**.

It does not materially impact on any of the Self-Governance criteria and is comprised of non-material housekeeping changes that correct minor errors and inconsistencies in the BSC. As such, we believe this proposal meets the Fast Track Self-Governance criteria.

Fast Track Self-Governance Modifications are housekeeping Modifications to the BSC that do not go out for consultation. Rather, parties have 15 Working Days to raise an objection to the Panel’s determination of a Fast Track Self-Governance Modification, following Elexon sending a notification of such a determination.

### Timetable

Proposed Progression Timetable	
Event	Date
Present Initial Written Assessment to Panel	09 November 2023
Final Modification Report Published	10 November 2023
Appeal Window	10 November 2023 – 01 December 2023



### What is the Self-Governance Criteria?

A Modification that, if implemented:

(a) does not involve any amendments whether in whole or in part to the EBGL Article 18 terms and conditions; except to the extent required to correct an error in the EBGL Article 18 terms and conditions or as a result of a factual change, including but not limited to:

- (i) correcting minor typographical errors;
  - (ii) correcting formatting and consistency errors, such as paragraph numbering; or
  - (iii) updating out of date references to other documents or paragraphs;
- (b) is unlikely to have a material effect on:
- (i) existing or future electricity consumers; and
  - (ii) competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution, or supply of electricity; and
  - (iii) the operation of the national electricity transmission system; and
  - (iv) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and
  - (v) the Code’s governance procedures or modification procedures; and

(b) is unlikely to discriminate between different classes of Parties.

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<sup>18</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures> - The Panel may modify the Code “on the recommendation of BSCCo to rectify manifest errors in or to correct minor inconsistencies (or make other minor consequential changes) to the Code”

<sup>19</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures>

- The Panel may modify the Code “on the recommendation of BSCCo to rectify manifest errors in or to correct minor inconsistencies (or make other minor consequential changes) to the Code”

We invite the Panel to:

- **RAISE** this Modification Proposal in Attachment A, in accordance with BSC Section F2.1.1 (d) (iv);
- **AGREE** that this Modification **DOES NOT** impact the EBGL Article 18 terms and conditions held within the BSC;
- **AGREE** that this Modification should be progressed as a Fast Track Self-Governance Modification;
- **AGREE** that this Modification:
  - **DOES** better facilitate Applicable BSC Objective (d);
- **AGREE** that this Modification should be **approved**;
- **APPROVE** an Implementation Date of:
  - **29 February 2024** if no objections are notified;
- **APPROVE** the draft Legal Text;
- **NOTE** that Elexon will issue the Fast Track Self-Governance Modification Report (including the BSC Legal Text), which will then be subject to a 15 Working Day objection period.