| BSC Modification Proposal Form | At what stage is this document in the process? |
|---|---|
| # Modification Title: Housekeeping and updating names to “Consumer Scotland”, “Generation Curtailment Validation Committee” and “GCVC” | 01 Modification<br>02 Workgroup Report<br>03 Draft Modification Report<br>04 Final Modification Report |

**Purpose of Modification:**

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).

**Does this Modification impact any of the European Electricity Balancing Guideline (EBGL) Article 18 Terms and Conditions held within the BSC?**

☐ Yes ☒ No

Elexon recommends that this Modification should:

- be raised by the Panel in accordance with the provisions of Section F - Modification Procedures F2.1.1 (d)(iv)
- be treated as a Fast Track Self-Governance Modification Proposal

This Modification will be presented by Elexon to the BSC Panel on 9 November 2023. The Panel will consider Elexon’s recommendation and determine how best to progress the Modification.

High Impact:

N/A

Medium Impact:

N/A

Low Impact:

Elexon


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## Timetable

**The Proposer recommends the following timetable:**

| | |
|---|---|
| Initial consideration by Panel | 09 November 2023 |
| Final Modification Report published | 10 November 2023 |
| Appeal Window Opens | 10 November 2023 |

**Any questions?**


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Proposer's representative:

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| | | |
|---|---|---|
| Appeal Window Closes | 01 December 2023 | 020 7380 4270 |


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# 1 Why Change?

## What is the issue?

The Scottish government have created a new non-ministerial office (Consumer Scotland) following the passage of the Consumer Scotland Act 2020[1], 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[2] in 2022.

Also, the "Network Gas Supply Emergency Settlement Validation Committee" was renamed to "Generation Curtailment Validation Committee" in CP1581 'Recommendation to update BSCP18 following Issue 105'[3]. Therefore, any references to "Network Gas Supply Emergency Settlement Validation Committee" and "NGSESVC" must be updated to "Generation Curtailment Validation Committee" and "GCVC" to bring Section B of the BSC in line with that Change.

In addition, 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.

## Desired outcomes

By changing references to "Citizens Advice Scotland" to "Consumer Scotland", we will bring the BSC in line with changes made to Section C3 of the Electricity Transmission Licence[4] in 2022.

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'[5], 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'[6].

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.

[1] https://www.legislation.gov.uk/asp/2020/11/contents/enacted
[2] https://www.ofgem.gov.uk/sites/default/files/2023-03/Electricity%20Transmission%20Consolidated%20Standard%20Licence%20Conditions%20-%20Current.pdf
[3] https://www.elexon.co.uk/change-proposal/cp1581/
[4] https://www.ofgem.gov.uk/sites/default/files/2023-03/Electricity%20Transmission%20Consolidated%20Standard%20Licence%20Conditions%20-%20Current.pdf
[5] https://www.elexon.co.uk/change-proposal/cp1581/
[6] https://www.elexon.co.uk/change-proposal/cp1581/


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# 2 Solution

## Proposed Solution

Under BSC Section F 'Modification Procedures[7]' 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.

BSC Section B 'The Panel'[8]

- "1.1 Establishment and composition", changing "Citizens Advice Scotland" to "Consumer Scotland". This is updating a name of an organisation, which falls under Fast Track Self-Governance criteria.
- "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. This is updating a name of an organisation, which falls under Fast Track Self-Governance criteria.
- "3.6 Network Gas Supply Emergency Settlement Validation Committee", changing "Network Gas Supply Emergency Settlement Validation Committee" to "Generation Curtailment Validation Committee" This is updating a name of a committee, which falls under Fast Track Self-Governance criteria.
- "3.6.1 Network Gas Supply Emergency Settlement Validation Committee", changing "Network Gas Supply Emergency Settlement Validation Committee" to "Generation Curtailment Validation Committee(s)". This is updating a name of a committee, which falls under Fast Track Self-Governance criteria.
- B4.6.1(f) correcting "Chai" to "Chair". This is correcting a minor spelling mistake, which falls under Fast Track Self-Governance criteria.

BSC Section F 'Modification Procedures'[9]

- "2.1 Modification Proposals", changing "Citizens Advice Scotland" to "Consumer Scotland" (two instances). This is updating a name of an organisation, which falls under Fast Track Self-Governance criteria.

BSC Section L 'Metering'[10]

- 2.3.2A, correcting reference to "paragraph 2.1.1(a)" to "paragraph 2.1.3(a). This is correcting a typographical and referencing mistake, which falls under Fast Track Self-Governance criteria.

BSC Section T 'Settlement and Trading Charges'[11]

- 4.3B.3, correcting "$VBMUSDV_{iji2}$" to "$VBMUSDV_{i2ji}$". This is correcting a typographical mistake, which falls under Fast Track Self-Governance criteria.

[7] https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures
[8] https://bscdocs.elexon.co.uk/bsc/bsc-section-b-the-panel
[9] https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures
[10] https://bscdocs.elexon.co.uk/bsc/bsc-section-l-metering
[11] https://bscdocs.elexon.co.uk/bsc/bsc-section-t-settlement-and-trading-charges


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BSC Section X-1 'General Glossary'[12]

- 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;". This is correcting a definition, which falls under Fast Track Self-Governance criteria.

BSC Section Z 'Performance Assurance'[13]

- "2.1 Panel Committee", changing "Citizens Advice Scotland" to "Consumer Scotland". This is updating a name of an organisation, which falls under Fast Track Self-Governance criteria.

## 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.

[12] https://bscdocs.elexon.co.uk/bsc/bsc-section-x-1-general-glossary
[13] https://bscdocs.elexon.co.uk/bsc/bsc-section-z-performance-assurance


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# 3 Relevant Objectives

| Impact of the Modification on the Relevant Objectives: | |
|---|---|
| Relevant Objective | Identified impact |
| a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence<br><br>Elexon believes this Modification is neutral against this objective. | Neutral |
| (b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System<br><br>Elexon believes this Modification is neutral against this objective. | Neutral |
| (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<br><br>Elexon believes this Modification is neutral against this objective. | Neutral |
| (d) Promoting efficiency in the implementation of the balancing and settlement arrangements<br><br>Elexon believes this Modification is positive against this objective. | **Positive** |
| (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]<br><br>Elexon believes this Modification is neutral against this objective. | Neutral |
| (f) Implementing and administrating the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation<br><br>Elexon believes this Modification is neutral against this objective. | Neutral |
| (g) Compliance with the Transmission Losses Principle<br><br>Elexon believes this Modification is neutral against this objective. | Neutral |

**Applicable BSC Objective (d)**

This Modification 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 for its users.


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# 4 Potential Impacts

## Impacts on Core Industry Documents

| Impacted Core Industry Documents | | | |
|---|---|---|---|
| ☐Ancillary Services Document | ☐Connection and Use of System Code | ☐Data Transfer Services Agreement | ☐Use of Interconnector Agreement |
| ☐Retail Energy Code | ☐ Transmission License | ☐System Operator Transmission Owner Code | ☐Supplemental Agreements |
| ☐Distribution Code | ☐Grid Code | ☐ Other (please specify) | ☒ None |

This Modification does not impact on any existing Core Industry Documents.

## Impacts on BSC Systems

| Impacted Systems | | | | |
|---|---|---|---|---|
| ☐CRA | ☐CDCA | ☐PARMS | ☐SAA | ☐BMRS |
| ☐EAC/AA | ☐FAA | ☐TAAMT | ☐NHHDA | ☐SVAA |
| ☐ECVAA | ☐ECVAA Web Service | ☐Elexon Portal | ☐Other (Please specify) | ☒None |

This Modification does not impact any BSC systems.

## Impacts on BSC Parties

| Impacted Parties | | | |
|---|---|---|---|
| ☐Supplier | ☐Interconnector User | ☐Non Physical Trader | ☐Generator |
| ☐Licensed Distribution System Operator | ☐National Electricity Transmission System Operator | ☐Virtual Lead Party | ☐Other (Please specify) |

This Modification does not impact BSC Parties.


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## Impacts on consumers and the environment

| Impact of the Modification on consumer benefit areas: | |
|---|---|
| Consumer benefit area | Identified impact |
| Improved safety and reliability | Neutral |
| Lower bills than would otherwise be the case | Neutral |
| Reduced environmental damage | Neutral |
| Improved quality of service | Positive |
| Benefits for society as a whole | Neutral |

**Improved quality of service**

Correcting the BSC will improve clarity within the Code, making it easier for our customers to engage with.

## Legal Text Changes

Six Sections of the BSC will be impacted by this Modification, set out in Section 2 of this document.


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# 5 Governance

## Self-Governance

| ☐ **Not Self-Governance –** A Modification that, if implemented: | |
|---|---|
| ☐ materially impacts the Code's governance or modification procedures | ☐ materially impacts sustainable development, safety or security of supply, or management of market or network emergencies |
| ☐ materially impacts competition | ☐ materially impacts existing or future electricity consumers |
| ☐ materially impacts the operation of national electricity Transmission System | ☐ is likely to discriminate between different classes of Parties |
| ☐ involves any amendments to the EBGL Article 18 Terms and Conditions related to Balancing; except to the extent required to correct an error or as a result of a factual change | |
| ☒ **Self-Governance –** A Modification that, if implemented: | |
| Does not materially impact on any of the Self-Governance criteria provided above | |

All of the proposed changes are non-material and have no impact on the interpretation of the Code.

## Progression route

| ☐ **Submit to assessment by a Workgroup** –:A Modification Proposal which: | |
|---|---|
| does not meet any criteria to progress via any other route. | |
| ☐ **Direct to Report Phase** – A Modification Proposal whose solution is typically: | |
| ☐ of a minor or inconsequential nature | ☐ deemed self-evident |
| ☒ **Fast Track Self-Governance** – A Modification Proposal which meets the Self-Governance Criteria and: | |
| is required to correct an error in the Code as a result of a factual change including but not limited to: | |
| ☒ updating names or addresses listed in the Code | ☒ correcting minor typographical errors |
| ☒ correcting formatting and consistency errors, such as paragraph numbering | ☒ updating out of date references to other documents or paragraphs |
| ☐ **Urgent –** A Modification Proposal which is linked to an imminent issue or current issue that if not urgently addressed may cause: | |
| ☐ a significant commercial impact on Parties, Consumers or stakeholder(s) | ☐ a Party to be in breach of any relevant legal requirements. |
| ☐ a significant impact on the safety and security of the electricity and/or gas systems | |


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Elexon recommends that this Modification should progress as a Fast Track Self-Governance Modification. It 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.

## Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No. We have requested that this proposal is treated as an SCR Exempt Modification Proposal.

## Does this modification impact the code drafting and system development for Market wide Half Hourly Settlement (MHHS), if so, how?

No, we do not believe this impacts the code drafting or MHHS design.

## Does this Modification impact any of the EBGL Article 18 Terms and Conditions held within the BSC?

No, Elexon does not believe that this Modification impacts on the EBGL Article 18 Terms and Conditions held with the BSC. The documents that this Modification seeks to update does not form part of the EBGL Article 18 Terms and Conditions.

## Implementation approach

Elexon 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 release, which would be the most efficient way to implement this change.


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