

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

P372 'Speeding up the approval process for the publication of BSC data on the BMRS'

To simplify the governance arrangements and reduce the timescales for the publication of data on the Balancing Mechanism Reporting Service (BMRS)



The BSC Panel initially recommends **approval** of P372

This Modification is expected to impact:

- ELEXON as the Balancing and Settlement Code Company (BSCCo)
- BSC Panel
- Ofgem

290/07

P372
Draft Modification Report

2 May 2019

Version 1.0

Page 1 of 32

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Contents

1	Summary	3
2	Why Change?	5
3	Solution	9
4	Impacts & Costs	11
5	Implementation	13
6	Workgroup's Discussions	14
7	Workgroup's Conclusions	23
8	Panel's Initial Discussions	25
9	Report Phase Consultation Responses	27
10	Recommendations	28
	Appendix 1: Workgroup Details	29
	Appendix 2: Glossary & References	31

About This Document

This is the P372 Draft Modification Report, which ELEXON will present to the Panel at its meeting on 9 May 2019. It includes the responses received to the Report Phase Consultation on the Panel's initial recommendations. The Panel will consider all responses, and will agree a final recommendation to the Authority on whether the change should be made.

There are seven parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits/drawbacks and proposed implementation approach. It also summarises the Workgroup's key views on the areas set by the Panel in its Terms of Reference, and contains details of the Workgroup's membership and full Terms of Reference.
- Attachment A contains the draft redlined changes to the BSC for P372.
- Attachment B contains the draft Code Subsidiary Document for P372.
- Attachment C contains the draft redlined changes to BSCP40 for P372.
- Attachment D contains the proposed Terms of Reference for the new Panel Committee.
- Attachment E contains the Business Requirements for P372.
- Attachment F contains the full responses received to the Workgroup's Assessment Procedure Consultation.



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290/07

P372
Draft Modification Report

2 May 2019

Version 1.0

Page 2 of 32

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Why Change?

The requirement to raise a Modification to make additions or changes to the data reported via the Balancing Mechanism Reporting Service (BMRS), is contributing to extended timescales for implementing these updates.

The BSC is constructed in a way that means the burden of governance can be reduced while maintaining appropriate oversight, by taking BMRS changes out of the Modification process and putting them under formal control of the Change Proposal (CP) process.

Solution

This Modification proposes to move a selection of reports, currently set out in Annex V-1, to a new Code Subsidiary Document (CSD). This would remove the need to progress a Modification for any future amendments while retaining obligations to provide or report required data remain within the BSC.

Instead, a CP would be progressed. These typically take around 3 months to get a decision. CPs are typically approved by the Panel Committees (instead of the Panel). The [BSC Baseline Statement](#) details which Panel Committees are responsible for approving the BSC CSDs.

BMRS changes, which meet newly established criteria, designed to speed up the progression of 'De-Minimis BMRS Changes,' will not be subject to the normal CP consultation and will instead be progressed straight for decision. A 15 Working Day objection window will allow market participants to challenge the application of the criteria. Where challenged the CP will progress through the normal CP route.

Additional Workgroup Recommendations

The P372 Workgroup additionally recommends the establishment and ongoing operation of a new Panel Committee to oversee items, including changes, which relate to the reporting and publishing of information on the BMRS. For the avoidance of doubt, this recommendation is not an obligation imposed by the P372 solution.

Impacts & Costs

P372 is a document only change that will directly impact ELEXON and the BSC Panel. ELEXON will need to implement new change processes to deliver the P372 solution. No BSC Central Systems impacts have been identified.

This Modification will impact the roles undertaken by the Panel and the Authority to the extent that certain decisions that would have been made by the Panel or the Authority will now be made by the relevant Panel Committee.

Should the BSC Panel follow the recommendation of the Workgroup to establish a new Panel committee on a standing basis, ELEXON will need to develop and coordinate resources for its establishment and ongoing operation, the expected implementation efforts for which are described in section 4.

What are the BMRS and BMRA?

The Balancing Mechanism Reporting Service (BMRS) website provides near real time and historic data about the Balancing Mechanism.

The Balancing Mechanism Reporting Agent (BMRA) collects and publishes information about the electricity system in Great Britain.

290/07

P372
Draft Modification Report

2 May 2019

Version 1.0

Page 3 of 32

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Implementation

P372 is proposed for implementation on **27 June 2019** as part of the June 2019 BSC Release.

Recommendation

The BSC Panel initially **unanimously** agreed with the Workgroup's unanimous belief that P372 **would** better facilitate Applicable BSC Objective (c) and (d) compared to the current baseline, and so should therefore be **approved**. The Panel initially believe that P372 should be treated as a **Self-Governance** Modification.

290/07

P372
Draft Modification Report

2 May 2019

Version 1.0

Page 4 of 32

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Background

The BMRS is the primary channel for providing operational data relating to GB Electricity Balancing and Settlement arrangements, as well as REMIT¹ and European Transparency Regulation² data. It's used extensively by Market Participants to help fulfil regulatory obligations, make trading decisions and understanding market dynamics, and acts as a prompt reporting platform as well as a means of accessing historic data. The BMRS has a wide user base both within and outside of the energy industry and includes traders, regulators, industry forecasting teams and academics.

Market participants can choose to receive the information via a 'high-grade' service for a charge (in accordance with [Section D 'BSC Cost Recovery and Participation Charges'](#)), where the information is sent to them directly via a TIBCO feed. The TIBCO software provides the mechanism for automated publication of BMRS data to a website. Alternatively, they can make use of the Application Programming Interfaces (API), data push services or the BMRS Website, which are freely available to everyone.

The BMRS has, over time, evolved into industry's one-stop-shop for the publication of electricity market information. The scope of the reports to be published on the BMRS is set out in [BSC Section V: 'Reporting'](#) with some of the detail (data and settlement periods, publication, frequency and format) available in each report set out in [Annex V-1](#).

Usage of the BMRS continues to grow, particularly since the introduction of the API (Application Programming Interface) service. As an example, in April 2017, there were 336k data requests via the API service; in April 2018, that number had increased to 1.2m and there are now 14k users accessing the BMRS APIs. It would be inefficient and costly if the further use and evolution of the BMRS as industry's one-stop-shop for electricity market information was frustrated due to the constraints of the Modification Procedures.

BMRS Reporting

BSC [Section V 'Reporting'](#) sets out details of the BMRS; and other reporting requirements from BSC Agents to Parties, the Authority and/or for public reporting. Section V establishes the requirements for BMRS reporting as follows:

- a Balancing Mechanism Reporting Service is required to be established in accordance with the relevant technical specifications contained in the Communication Requirements Document (a document that covers the communication between BSC Agents and Parties);
- the data receipt requirements of the BMRS are defined with reference where applicable to Section Q (for Balancing Mechanism data), Section K (for registration/BM Unit data), and Section T (for Market Index data);
- the calculation/data processing requirements of the BMRS are established; and
- the data to be reported is defined, pursuant to any supplemental detail contained in the Reporting Catalogue.

¹ Regulation on Energy Market Integrity and Transparency, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32011R1227>

² Regulation on submission and publication of data in electricity markets, <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF>

In addition, the tables in Section V Annex V-1 summarise what data is required, how frequently it is required, in what format (i.e. a graph or table) and what default data should be used if the BMRS were to become unavailable. This information is then expanded in more detail in the Reporting Catalogue. In the case of Central Volume Allocation (CVA) reporting the full technical details are contained within the NETA IDD, while for Supplier Volume Allocation (SVA) reporting, these are documented within the SVA Data Catalogue. In both cases, details are included in the relevant User Requirements Specification, which can be thought of as detailing the user/business requirements.

Reporting Catalogue

The Reporting Catalogue is established under Section V1.4 of the Code as a Code Subsidiary Document (CSD) whose intent is to set out the data items to be contained in each of the reports referenced in Section V Annex V-1. It establishes or confirms the key reporting elements, but defers to the NETA IDD for the data flow details. It was intended to act as a bridge between the high level reporting requirements within the Code and the more detailed user requirements for the central systems in the relevant CSDs.

NETA IDD

The NETA IDD details the relevant data flow structure, formats, data types and senders/recipients for the BMRS data.

What is the issue?

The requirement to raise a Modification to make additions or changes to the data reported via BMRS is contributing to extended timescales for progressing these updates.

The BSC is constructed in such a way that means the burden of governance can be reduced while maintaining appropriate oversight, by taking BMRS changes out of the Modification process and putting them under control of the Change Proposal process.

BMRS Governance

The general structure of the BSC is that the Code provides the rights, principles and obligations, while the CSDs that sit beneath provide the relevant procedures, specifications and details of how these arrangements are to be carried out.

However, Section V Annex V-1 provides significant amount of low level detail around reporting requirements that would normally be contained in a CSD.

Further lower level detail for BMRS data is captured in the Reporting Catalogue or Interface Definition and Design Documents (IDDs); documents that are subject to the change control arrangements set out in BSCP 40 – 'Change Management' via the CP process.

Examples of this lower level detail include stating the format that a particular item of data should be reported in (such as graphical or tabular), or defining a specific report identifier. It should be noted that the original intent of the Reporting Catalogue was to provide the detail around the BMRS outputs that are listed within Section V. However, the level of

detail given within the Code itself means that there is very little that the Reporting Catalogue is able to add before it defers downwards to the more detailed documentation. Because of this, it is very difficult to change the Reporting Catalogue without also making changes to Section V. It is therefore questionable as to the value in having such a 'catalogue' if you cannot add, remove or update specific elements within it without needing to make corresponding updates to the Code too.

BMRS Change Process

Currently, any participant who wishes to make a relatively minor change to how a particular data item is reported on the BMRS, such as to add a graph for data that was only displayed as a table, would need to raise a Modification in order to make the corresponding change to Section V Annex V-1. This is in contrast to other areas of the BSC, where such detailed requirements would usually be held in a CSD, and a Modification would only be required where the change would impact the fundamental elements covered by the Code or would introduce new obligations.

Once approved new or amended publication requirements are implemented within the scope of a scheduled BSC Systems Release which occur 3 times each year in February, June and November.

The timescales for raising, assessing, approving and implementing Modifications can be lengthy, with the end-to-end timescales for raising and implementing a Modification to publish new or amended BMRS data is on average 17 months (average taken from the previous eight Modifications related to BMRS reporting).

Due to these visible elongated timescales, some industry participants are making their own publication arrangements rather than using the BMRS. This makes accessing data more arduous, adds complexity, and may reduce transparency, adversely impacting on competition.

National Grid Electricity System Operator (ESO) Criticism

Over the last 6 to 9 months we have observed public criticism of the timescales for the publication of data on the BMRS. Set out below are some of the comments received:

- at ESO's October 2017 Operational Forum, ESO stated that it had considered using the BMRS as a publication route for its balancing services trades but had rejected the BMRS as being too slow to implement when coupled with the BSC Modification process;
- in their draft Forward Work Plan published on 12 February 2018, the ESO state that "Stakeholders have told us that they want information about trades enacted by the ESO to be published more quickly than via ELEXON"; and
- at ESO's April 2018 Operational Forum, NG stated that it is considering moving away from the BMRS because the change cycle takes too long.

A proliferation of websites all purporting to be the definitive source of electricity market information is wasteful, inefficient and particularly confusing and unhelpful for both existing industry members but also for new market entrants. ELEXON have commented that whilst it would never demand that industry publish its electricity market data on the BMRS, ELEXON can ensure, through proportionate and flexible BSC Change Management

processes that the BMRS is accessible and provides for a cost effective and timely publication mechanism.

Proposed solution

BSC Section V will be streamlined by removing BMRS requirements, and reporting in general, leaving only the necessary high level obligations. The detail removed from Section V would instead be captured within a new CSD since it is important that the list of data and reports that should be published is documented, along with associated details such as frequency and recipient.

In summary, this Modification proposes to move a selection of reports, determined by the Modification Workgroup, currently set out in Annex V-1, to a new CSD³ (which can be found in Attachment B).

This would remove the need to progress a Modification for suitable BMRS content changes. Instead, a Change Proposal would be progressed. These typically take around 3 months to get a decision. This will enable new and amended publication requirements to be managed through the BSCP 40 – Change Management process which will:

- enable ELEXON to proactively propose changes to the list, as ELEXON is able to raise Change Proposals whereas it cannot raise Modification Proposals, improving timescales for proposals for new or amended BMRS data;
- address the public perception that, when coupled with BSC Modification Procedures, changes to the BMRS are slow to make; and
- introduce a more proportionate arrangement for the progression and implementation of changes that are determined to be of low risk and impact.

New Change Proposal process

Further, P372 proposes to introduce a De Minimis BMRS CP progression route into the CP process. De Minimis BMRS CPs will not be required to be consulted on, but will be subject to a 15 Working Day objection window. If an objection is raised the De Minimis BMRS CP will progress through the normal CP route (including being issued for public consultation).

De Minimis BMRS CPs will be published on the BSC Website, notified to industry (as CPs currently are) and require Committee approval. De Minimis BMRS CPs must meet the following criteria, otherwise they will be progressed as a regular CP:

- the expected cost to ELEXON of implementing such change is no greater than the financial threshold set by the Panel from time to time and published on the BSC Website;
- the expected cost of implementing such change does not result in the aggregate cost of all De Minimis BMRS Changes implemented (or to be implemented) during that BSC Year to exceed the aggregate financial threshold set by the Panel from time to time and published on the BSC Website;
- it is not anticipated by the relevant Committee that such change would require BMRS users and participants to amend their systems and processes; and

³ The Workgroup recommend that the new CSD be categorised as a Category 1 Configurable Item and placed under Panel Committee responsibility.

- the relevant Committee is satisfied that the change is independent and exclusive from other changes such that there are no other related changes with which such change could reasonably be amalgamated.

The intention of this new approach is to reduce the timescales to progress BMRS changes, reduce the burden on market participants to respond to consultations, whilst maintaining transparency and Change Management controls.

Workgroup recommendation to establish a Panel Committee

It is proposed that the new CSD, containing the removed BMRS requirements from the BSC, be placed under the control of a new Panel Committee, a 'BMRS Change Board', for De Minimis BMRS CPs and the [Imbalance Settlement Group](#) (ISG) and [Supplier Volume Allocation Group](#) for non-De Minimis BMRS CPs. This is a new approach to CPs. It effectively creates a two tier approval system, with small, low risk, low impact BMRS changes going to the BMRS Change Board and larger, higher risk BMRS changes going to the ISG/SVG (where a unanimous decision from both Committees is required for approval).

This approach was adopted by the Workgroup as it was not seen to be appropriate for a Committee to be creating and approving its own material changes.

In order to create the new Panel Committee, the Panel will be invited to establish the BMRS Change Board (using its powers derived from BSC Section B5), following the implementation of P372. Draft Terms of Reference for the new Committee are in Attachment D, and are based on the ISG and SVG Terms of Reference. In the absence of the BMRS Change Board, it is proposed that the ISG/SVG will be responsible for the new CSD.

Proposed powers functions and responsibilities of the suggested Panel committee include:

- Considering items, including changes, that relate to the reporting, publishing and collection of data and information for use on the BMRS;
- Approving and authorising changes of those documents, process and systems that are defined in the BSC Baseline Statement as being the responsibility of the Committee (and for the avoidance of doubt this does not include the raising of Modifications), in accordance with BSCP40.
- Providing guidance and insight on the long-term development and strategy of the BMRS platform, producing an annual strategy for presentation to the BSC Panel to this effect.

Legal text

The proposed redlined changes to the BSC to deliver P372 can be found in Attachment A.

Other redlined documents

The proposed changes to the new Code Subsidiary Document can be found in Attachment B. The proposed changes to BSCP40 can be found in Attachment C.

The proposed Terms of Reference for the new Panel committee can be found in Attachment D.

290/07

P372
Draft Modification Report

2 May 2019

Version 1.0

Page 10 of 32

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4 Impacts & Costs

This Modification will impact the roles undertaken by the Panel and the Authority to the extent that certain decisions that would have previously been made by the Panel or the Authority can now be delegated to the relevant Panel Committee.

No BSC Central Systems impacts have been identified.

Estimated central implementation costs of P372

ELEXON's costs to implement P372 are approximately £3,600. These costs are primarily driven by the need to amend internal processes and documents.

- 12 Working Days effort to implement new internal processes and documents; and
- 3 Working Days effort to implement document changes to the BSC and Code Subsidiary Documents (CSDs).

New Panel Committee costs

Should the Panel establish a new Panel Committee to oversee BMRS activities, ELEXON estimates between 5 to 10 days effort to establish the Committee (£1200 to £2400) and 6 and 10 days effort (£1400 – £2400) to operate the new Committee per meeting. This includes providing a secretary and chair to the Committee.

Indicative industry costs of P372

No implementation costs have been identified.

P372 impacts

Impact on BSC Parties and Party Agents	
Party/Party Agent	Impact
No implementation impacts identified	

Impact on Transmission Company	
No impacts identified	

Impact on BSCCo	
Area of ELEXON	Impact
Disputes, Compliance & Administration	Setting up the new Panel Committee and operating the new Panel Committee.
Change Team	Updating local working instructions, guidance notes and website to implement the amendments to the CP process.

290/07

P372
Draft Modification Report

2 May 2019

Version 1.0

Page 11 of 32

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Impact on BSC Systems and processes

No BSC Central System impacts have been identified

Impact on BSC Agent/service provider contractual arrangements

BSC Agent/service provider contract	Impact
BMRA	No implementation impacts identified.

Impact on Code

Code Section	Impact
BSC Section V	This Modification proposes to remove reporting requirements from Section V into subsidiary documents.

Impact on Code Subsidiary Documents

CSD	Impact
New - BMRS Data Catalogue	A new subsidiary document containing the reporting requirements removed from BSC Section V.
BMRA Service Description	Amended to reference the new location of detail removed from BSC Section V.
BSCP40 'Change Management'	Amended to facilitate the progression of De Minimis BMRS changes.

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

Ofgem as the Authority confirmed to ELEXON that P372 doesn't interact with any ongoing SCR on 3 September 2019. Further, the Workgroup didn't identify any interactions with ongoing SCRs.

Impact on Consumers

We do not believe the solution to this Modification will have any material impacts on consumers.

Recommended Implementation Date

The Panel recommends an Implementation Date for P372 of:

- 27 June 2019 as part of the June 2019 BSC Release.

This is the next available release.

Which reporting requirements should be removed from BSC Section V 'Reporting'?

There was consensus across the Workgroup that the process of making minor changes to the BMRS is unnecessarily prolonged as a result of having to raise a Modification in order to amend reporting requirements contained in BSC Section V 'Reporting'.

It was additionally recognised that the perception of the BMRS as slow to make changes to is actively dissuading BSC Parties from proposing potentially-beneficial changes to the platform. This was viewed as hampering the quality of service that BMRS can provide to the industry.

However, the Workgroup recognised that this need for efficiency and desire to speed up BMRS changes must be balanced against the various rights and obligations that ELEXON, other BSC Agents and the Transmission Company are subject to, that were unanimously considered unsuitable to remove from BSC.

At the first meeting of the P372 Workgroup, Members developed a set of high-level guiding principles for the removal of reporting requirements that would guide the process of drafting the solution. These were as follows:

- Low level detail around reporting requirements should be removed from the BSC and placed in an appropriate Code Subsidiary Document;
- In general, data items, formats and frequencies should be removed from the BSC. However particular consideration should be paid to sensitive data items such as REMIT, as well as any transparency requirements, including the European Transparency Regulation data; and
- Where reporting requirements have been removed from Section V, the BSC shall reference where the BMRS reporting requirements can be found.

The Workgroup believed that these principles provided a basis on which to move forward and discussed which reporting requirements should be removed from BSC Section V.

Having agreed to these principles, Members then reviewed BSC Section V (including the Annexes) and considered the reporting requirements contained therein, with the Workgroup's views sought on whether they would be suitable for removal.

Outcomes

In the second Workgroup meeting, ELEXON presented draft legal text that incorporated these suggestions from the Workgroup. In general, low level detail around reporting requirements was removed from the BSC and placed in a new Data Catalogue, which is an existing type of Code Subsidiary Document.

The Workgroup was satisfied that the draft changes to BSC Section V delivered the solution.

The proposed redlined changes to the BSC to deliver P372 can be found in Attachment A.

Are there any requirements that should unequivocally remain in the BSC itself?

BSC Section V contains a number of sensitive data items and obligations related to the reporting of data by ELEXON, other BSC Agents and the submission of data from the Transmission Company to the BMRA, along with Transparency Regulation data requirements.

The Workgroup felt that these should remain in the BSC as it was felt that these would not be appropriate to be governed by BSCP40 'Change Management' rather than the Modification process. This was on the basis that the BSC should continue to contain the higher level requirements for specific roles to provide, report or receive data. For example, it would not be appropriate to move the obligation for BMRA to receive data from the Transmission Company in relation to Balancing Activities into a CSD.

By ensuring that these obligations are maintained at the Code level, the Workgroup were satisfied that this would avoid damaging the integrity and usefulness of BMRS as a service for industry.

Outcomes

The Workgroup agreed that while detailed requirements specifying exactly how obligations are to be discharged should be removed from the BSC the following high level obligations and rights should remain:

- The obligation to publish and receive data;
- The obligation to interpret and transform data;
- The obligation to retain data; and
- The obligation to calculate data in accordance with relevant BSC Sections e.g. T and Q.

It was additionally noted by one Member that a new obligation to ensure provision of machine-readable data on the BMRS that is key for market participants should be created. This obligation has been drafted and included within the new CSD.

Where should reporting requirements be captured?

At the first meeting of the P372 Workgroup, Members discussed the merits of capturing reporting requirements removed from Section V in either a new or an existing CSD, and who should be responsible for the document i.e. a Panel Committee or the Panel.

It was noted that placing BMRS reporting requirements within a document under BSC Panel control could result in it being quicker to update. This is because the Panel only require a majority decision. Whereas, the ISG/SVG, who would be the logical choice to own the document, require unanimous agreement from Members. Further, if the document was jointly owned between ISG/SVG, both Committees must unanimously agree for any change to be approved.

A Member proposed that the new document could be placed under Panel control, but using a new governance process to expedite BMRS changes. Members were of the belief that, were this option to be taken for the P372 solution, a consultation period may need to be incorporated for certain classes of BMRS change, for example where the change would impact existing data items or incur costs above a specified amount.

Placing detail in a CSD under Committee control, on the other hand, would benefit from a defined governance process that, the Workgroup believed, provided greater visibility and transparency to industry.

Following discussion, the Workgroup expressed their preference for placing the reporting requirements within a Panel Committee controlled CSD rather than a Panel-controlled document, as they felt Panel Committees could provide more specialist knowledge and expertise on BMRS matters.

ELEXON then asked Workgroup Members for their views on whether an existing CSD, such as the Reporting Catalogue, would be suitable to accommodate the detail removed from Section V or whether a new CSD should be drafted for this purpose.

It was clarified at the Workgroup that existing documents fall mostly under the ownership of existing Committees. However, there are a few CSDs that fall under Panel control. The responsible authority for CSDs is detailed in the Baseline Statement, which is controlled by the Panel.

In the case of the Reporting Catalogue, this would mean that both the Imbalance Settlement Group (ISG) and Supplier Volume Allocation Group (SVG) would have joint ownership of the document containing the BMRS reporting requirements and require both of the committee's unanimous approval in order to make amendments to it. This is because BMRS contains more CVA than SVA data.

It was noted that the ISG and SVG, whilst familiar with BMRS, were not specifically experts on it. The Workgroup believed there could therefore be benefits in forming a new Panel Committee, with specialist expertise with the data reported on BMRS. The Workgroup also believed there was advantages in have users of BMRS sit on this Committee as they could provide useful feedback on BMRS and also help design and recommend changes to BMRS. In this sense the Committee would be a mix of a user group and a Panel Committee.

Outcomes

Following discussions, it was determined that reporting requirements removed from the BSC should be included in a new, standalone Code Subsidiary Document as this was seen to bring the most clarity for Market Participants as an easily accessible 'source of truth', on the basis that interested parties need only look in one place for market information.

The proposed new Code Subsidiary Document can be found in Attachment B.

The need for ongoing visibility and transparency

It was noted by Members, that care would need to be taken in removing detail from the BSC due to the potential for unintentionally reducing the visibility, and transparency of BMRS changes via the Change Proposal Process as opposed to the Modification Process.

The Workgroup highlighted the need for effective communication between ELEXON, BSC Parties and non-Party BMRS users, highlighting the potential large impacts that amendments to existing data items could incur upon Market Participants for whom BMRS data is key to their business.

The Workgroup considered the various channels that ELEXON currently has at its disposal to reach BMRS users, and that could be used to address this potential communication gap and communicate future BMRS changes to both BSC Parties and non-Party BMRS users.

Existing Change Proposals are currently communicated to BSC Parties via ELEXON's BSC Change Distribution List. Members believed that this alone would not be sufficient, given that non-Parties make use of the BMRS and would need to be made aware of any changes to the platform.

It was suggested that non-Parties could sign up to this distribution list in order to stay informed of changes, but it was pointed out that by doing so they would receive every single notification of BSC Change, regardless of whether it was relevant to BMRS or not, and that this could prove onerous.

It was noted that circulars are currently used to inform BMRS users of events such as outages, and that this could be an appropriate channel over which to communicate BMRS change.

Outcomes

Following discussion, Members expressed their preference for both circulars and the distribution list to be employed for the purposes of communication of BMRS change to both BSC and non-BSC Parties.

Governance of low-impact BMRS change

Central to discussions about the development of the P372 solution was the balancing of a desire to speed up minor BMRS changes with the need to maintain appropriate checks, balances and visibility of changes that could potentially impact users of the BMRS.

Recommendation to form new Panel committee

The Workgroup proposed the creation of a new Panel committee focused on market reporting to provide oversight and governance. It was the Workgroup's belief that this would not only be helpful in providing oversight and visibility of minor BMRS change, but also add value in the form of a long-term strategy development as a body with the expertise to identify 'quick wins' and assist in evolving the service provided by BMRS for the benefit of industry.

In particular, ELEXON sought the Workgroup's views on the level of governance that the new committee should be authorised to provide, the role that they would play in the progression of BMRS change and what limits, checks and balances should apply to the new Panel committee.

An advisory committee with a model similar to the Unmetered Suppliers User Group (UMSUG) was considered by the Workgroup. However the Workgroup felt that the new committee could provide greater value to industry and should have greater powers than advisory sub-committees such as UMSUG or Technical Assurance of Metering Expert Group (TAMEG), which principally provide advice to Panel committees such as the (SVG) and Performance Assurance Board (PAB) respectively.

The Workgroup recommended that the proposed committee should have Self-Governance powers to determine and approve low-impact changes without a formal consultation period (as is currently mandated under the CP process). However, the Workgroup suggested that there should be a 15 Business Day window in which an appeal can be raised by BMRS users for a consultation.

One Member noted that, in practice, the lack of a mandated consultation would function in a similar manner to Modifications that have been deemed by the Panel as suitable to progress directly to the Report Phase and 'skip' the Assessment Procedure as described by [BSC Section F – 'Modification Procedures'](#).

Progressing directly to the Report Phase can only apply to Modification Proposals of a minor or inconsequential nature and/or where the recommendation which the Panel should make to the Authority in relation to such Modification Proposal would generally be considered to be self-evident.

It was clarified that the new CP approach would be comparable to Fast Track Modifications or Housekeeping CPs, as these examples are not expected to impact participants. So whilst participants will still need to consider a De Minimis BMRS CP, they will only need to respond where they identify any impacts or believe it should be subject to formal consultation.

The Workgroup recommended that this would facilitate the efficient progression of self-determined low-impact BMRS changes, while also providing further value as a body with oversight, governance and visibility of market reporting for the benefit of industry.

The Workgroup also suggested that the new committee should produce an annual strategy document that stated their intentions for development of the platform over the coming year.

The question of what should constitute a low-impact change was discussed by the Workgroup.

It was agreed that changes to add API-only new data to the BMRS would incur minimal impact on users and as such would be suitable for fast track progression. API-only new data changes were seen to be a good example of low impact changes and it was suggested by the Workgroup that these should be fast-tracked without consideration by the committee.

As part of the discussions around governance, one Member noted that recent investment by ELEXON in rolling out the API and Data Push Service should be taken advantage of in order to establish a more flexible and agile approach to BMRS change and unlock the value provided by such a service.

A number of criteria that would decide whether a BMRS change is suitable for progression in this manner were suggested:

- ELEXON estimated costs to implement the change into the BMRS system shall be no more than £30,000, with an annual (March to April) limit of £120,000 in cumulative costs for all changes;
- ELEXON estimated time needed to implement the change shall be not more than four months;
- The change should not require BMRS users and participants to amend their systems and processes; and
- The change should be self-contained, independent and exclusive from other changes.

During the second meeting of the Workgroup, members had proposed an original criterion of £5,000 ELEXON estimated costs to implement the change, with an annual limit of £50,000. Following analysis completed by ELEXON following the meeting to investigate the

expected costs and lead times that a De Minimis BMRS Change would be likely to incur, this outcome was confirmed with Members and a revised upper limit of £30,000 and annual limit of £120,000 were proposed.

As part of the discussions around governance, one Member noted that recent investment by ELEXON in rolling out the API and Data Push Service should be taken advantage of in order to establish a more flexible and agile approach to BMRS change and unlock the value provided by such a service.

It was agreed that changes to add API-only new data to the BMRS would incur minimal impact on users and as such would be suitable for fast track progression. API-only new data changes were seen to be a good example of low impact changes and it was suggested by the Workgroup that these should be fast-tracked without consideration by the committee.

It was noted that the eventual frequency of meetings by the new committee would depend on the level of business need, i.e. the number of proposed changes that the committee would need to consider.

Outcomes

The Workgroup believe that the Panel should establish a new Panel Committee on a standing basis, in accordance with the existing provisions in BSC Section B.

A number of criteria that would decide whether a given BMRS change would be suitable for self-governance progression via the new committee were proposed:

- ELEXON estimated costs to implement the change into the BMRS system shall be no more than £30,000, with an annual (March to April) limit of £120,000 in cumulative costs for all changes;
- ELEXON estimated time needed to implement the change shall be not more than four months;
- The change should not require BMRS users and participants to amend their systems and processes; and
- The change should be self-contained, independent and exclusive from other changes.

It was further recommended that BMRS changes approved by the new committee should not be subject to a mandatory consultation period and instead be subject to a 15 Business Day window in which Parties can appeal the decision of the new Panel committee and request a consultation period.

ELEXON determined that this would require a redlined change to the CP process in BSCP40 'Change Management' in order to exempt suggested changes from a mandated consultation period.

ELEXON have drafted Terms of Reference for the new Panel committee based on the recommendations of the Workgroup and these have been made available in Attachment D.

The recommendation by the Workgroup to establish this Committee is not an obligation imposed by the proposed solution to P372. However, the amended CP process is. Please

290/07

P372

Draft Modification Report

2 May 2019

Version 1.0

Page 19 of 32

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note that the P372 proposed solution does not ask the BSC Panel to approve the Terms of Reference for the new Committee, as this will be done as a separate exercise, following a P372 decision.

Viability of a Custom Release Schedule

It was noted that there are two main elements to the P372 solution; assessment and implementation. ELEXON clarified for the Workgroup that the legal text resulting from the Modification would exclusively deal with the assessment element, but that important discussions around implementation would still need to take place.

This included the principles under which it may be appropriate to deliver ad-hoc BSC Releases, how a custom or ad-hoc BSC Release schedule might match (or not) with how people interact with the standard BSC Release Schedule.

ELEXON clarified for the Workgroup that ELEXON's standard BSC Release schedule currently implements BSC Change Proposals and Modifications three times per year, in February, June and November.

It was noted that there are cost and overhead efficiencies associated with implementing batched, scheduled BSC Releases that cannot be achieved with an ad-hoc BSC Release, as well as providing BSC Parties and Market Participants with visibility of changes that will impact them and their systems. This approach enables Parties to plan the implementation of BSC changes.

One Member noted that, as BMRS is a service operated for the benefit of the industry, it would be unfortunate for the P372 solution to unintentionally introduce changes in a faster manner than industry can keep up with. However, it was noted that the De-Minimis nature of the changes that are intended to be progressed under the new CP process meant that this would be an unlikely consequence. This is because one of the criteria is that the De-Minimis BMRS change will not require market participants to amend their systems or processes. Therefore the change can be implemented at any time without impacting market participants.

In the second meeting, Members expressed an appetite for decoupling BMRS changes from the standard BSC Release schedule and moving to a more agile and flexible approach, where the changes do not impact market participants. This would enable those companies that wish to take advantage of new data items to do so, and to do so quicker than before.

In the case of low-impact changes, this approach was felt to be self-evident. For changes with a larger impact on the systems of BMRS users, Members acknowledged that more consideration of the lead times necessary for users to make changes to their systems would be needed.

Outcome

A consensus was reached that a principle should be followed by which if it is possible to decouple a given BMRS change from the standard Release timetable, then that should be the goal. It was additionally noted that the new Committee could provide a valuable steer where higher impact changes were being considered for an ad-hoc implementation. It should be noted that this is Workgroup recommendation for ELEXON consideration and not

part of the P372 legal text or redlining. ELEXON welcomes this view and will look to put in place the commercial arrangements to facilitate this.

Management of risk

The Workgroup highlighted a number of desired changes that had been identified but not previously progressed due to the perceived slowness of making change to the BMRS, and it was acknowledged that these would likely be proposed as a result of the P372 solution.

One Workgroup Member commented that the purpose of the P372 is to make it easier to make changes to the BMRS. Consequently, a surge in proposed changes following P372 implementation would illustrate the issue with the previous arrangements and support the idea that the P372 solution was addressing this defect.

It was additionally noted that the new committee would be able to effectively prioritise its workload and otherwise manage the volume of change requests it receives via existing mechanisms.

Other Members supported the view that an increase in the amount of BMRS changes would not be a problem if the changes proposed were sensible and beneficial for industry.

Are there any alternative solutions?

The Workgroup did not identify any alternative solutions, which it believes would better facilitate the Applicable BSC Objectives compared with the Proposed solution.

Clarification on views against Third Party Websites

The P372 Workgroup queried the Proposer's view against Applicable BSC Objective (c), with some Members stating that the wording could be interpreted as presenting a negative opinion of value-adding third party websites.

The Proposer confirmed that this was not their view and an action was taken to reword this view to make it clearer that this sentiment was intended to apply to central websites only and not seek to hamper innovation within the industry.

It was agreed that the wording of the Proposer's views against Objective (c) 'avoiding the wasteful and inefficient proliferation of websites publishing electricity market information' was confusing in nature and could be reworded to clarify that the Modification is not seeking to limit value-adding 3rd party websites.

ELEXON presented new wording to the Proposer at the second Workgroup meeting, who confirmed that they were satisfied with the amendment.

Suggested improvements outside the scope of P372

During the course of discussion by the P372 Workgroup, several limiting factors and suggested improvements for the BMRS were identified whilst acknowledged as out of scope of this particular Modification proposal.

One Member sought clarification as to the location of Balancing Mechanism (BM) Unit registration data and suggested that this data should be published on the BMRS rather than the ELEXON Portal, or via the API as an alternative.

It was also suggested that fuel types be incorporated with BMU data in order to improve the level of useful information offered by the service. This Member believed that this would make it easier for BMRS users to ascertain changes to BMU data and thus improve the service provided to the industry.

A Member asked whether additional system warning publications (as per [GC109](#) 'The open, transparent, non-discriminatory and timely publication of the generic and user specific values required to be specified by the relevant TSO(s) and / or relevant system operator et al., in accordance with the DCC') could be accommodated as part of the changes for this Modification. We note that there is not yet a solution for GC109 and confirm that this would need to be progressed as a new change, outside of P372.

On implementation of P372, changes to add new system warnings could be progressed quickly via the CP process, rather than relying on a Modification.

ELEXON will feed all of these suggested improvements into the new BMRS Panel Committee, subject to Panel approval.



The Workgroup **unanimously** believes that P372 **will** better facilitate the Applicable BSC Objectives and so should be **approved**.

Please note that P372 was raised by the Panel (in accordance with Section F2.1.1(d)(i)).

At the final Workgroup meeting on 27 March 2019, Members confirmed that the Assessment Procedure Consultation response had put no new arguments forward and had not altered their initial views against the Applicable BSC Objectives (as detailed in the Assessment Procedure Consultation and detailed below).

The Workgroup unanimously agreed that no changes were required to the solution following the Assessment Procedure Consultation.

Members noted the low response rate and, when prompted for feedback on why only one organisation had responded to the Assessment Procedure Consultation despite the varied benefits that the P372 solution would enable for market participants, members provided their views that:

- 1) A lack of response rate does not indicate that the industry are not interested and do not support the Modification. In fact, the low response rate could be seen as an indication that industry are comfortable with the P372 solution and do not feel it necessary to spend time and resources providing a rebuttal or response via a consultation response.
- 2) A lack of direct impact on market participants combined with heightened demands on time and resources means that consultation responses for P372 were likely to have been deprioritised – especially given the argument stated in 1).
- 3) Workgroup members stated their view that, by volunteering to be part of the P372 Workgroup, they were confident that their input into the P372 solution had been adequately represented, and that they did not feel it necessary to respond to the consultation.

Members' final views against each of the Applicable BSC Objectives are summarised below.

Workgroup's final recommendations

Applicable BSC Objective (c)

Workgroup members **unanimously** believe that the P372 solution **will** better promote competition in the generation and supply of electricity.

All members stated their belief that providing faster access to information via a faster and more agile change process would have a beneficial effect on competition in the electricity market.

The Proposer reiterated their view that the solution would help to provide a level playing field and facilitate equal access to market data for all Market Participants by improving transparency and making it easier for market participants to find information in one place. This will avoid the proliferation of central websites providing sources of electricity market information by strengthening the BMRS' position as a single version of the truth.

This sentiment was echoed by all Members of the P372 Workgroup. One member did warn that were the P372 solution to hinder third party websites then this would have a negative

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

290/07

P372
Draft Modification Report

2 May 2019

Version 1.0

Page 23 of 32

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effect on competition. However the same Member noted that this was not the intent or likely outcome of P372 given the proposed solution and so he believed P372 overall was still better for competition.

Another Member added that, by not limiting the amount of useful information that the BMRS could provide based on codified BSC specifics, this would further promote completion by improving access to useful information for all Market Participants.

Another Workgroup Member noted that the P372 solution would give an advantage to more nimble and flexible market participants and so promote competition in this manner.

Applicable BSC Objective (d)

Workgroup Members **unanimously** believe that the P372 solution **will** better facilitate Applicable BSC Objective (d) in that it would promote efficiency in the implementation of the Balancing and Settlement arrangements.

The Proposer reiterated their view that the solution would shorten the timescales for progressing proposals to publish new or amended data on the BMRS and extend the scope of the Panel's Self-Governance arrangements as decision making would be delegated to a Panel Committee with an Authority decision not, generally, required. This view was shared by all Workgroup Members. The Workgroup also noted that shortening the assessment of BMRS changes was only half of the story and that finding ways to implement BMRS changes in a more flexible and agile manner was also important. Should this be done, Applicable BSC Objectives (c) and (d) would be further facilitated for the reasons already given.

One Member stated that the new arrangements would indeed make arrangements more flexible and efficient, as well as maximising the potential afforded by new BMRS technology. This Member further noted that the creation of a new Committee had the potential of bringing to light new ideas and approaches to promote efficiency in the future.

Applicable BSC Objective (e)

The Proposer and Workgroup Members **unanimously** believed that P372 is **neutral** against Applicable BSC Objective (e).

One Member noted that the P372 solution would facilitate future BMRS change and, by doing so, positively impact compliance with European law (which has required significant changes to BMRS). However, he clarified that this would not be a direct result of the proposed Modification and that this was stated as a general observation rather than a stated view against the Applicable BSC Objective.

Applicable BSC Objectives (a), (b), (f) and (g)

The Proposer and Workgroup Members **unanimously** believed that P372 is **neutral** against Applicable BSC Objectives (a), (b), (f) and (g).



What are the Self-Governance criteria?

A proposal that, if implemented:

- a) 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

290/07

P372

Draft Modification Report

2 May 2019

Version 1.0

Page 24 of 32

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Panel Discussion on P372

The P372 Assessment Report was presented to the Panel on 11 April 2019. Panel members were supportive of the intent behind the P372 solution and the principle of removing detail from the BSC that does not need to be there.

Response rate

The low Assessment Procedure Consultation response rate was commented on, with Members agreeing with the Workgroup that a low response rate should be taken as sign of industry's comfort with the Proposed solution as a default position.

Recommendation to form a new Committee

While supportive of the P372 solution, some members questioned the value of the Workgroup's non-binding recommendation that a new Panel Committee be formed to provide governance and oversight over low-impact BMRS changes.

This was on the basis that they did not feel that adding an additional layer of bureaucracy in the form of a new Committee was in the spirit of simplification and speed that characterised other areas of the Workgroup's discussion, and that an existing Committee such as ISG could reasonably govern the progression of BMRS change.

The Proposer's representative clarified that the intent behind the formation of a new Committee had been to bring together a passionate group of BMRS experts and users who could help to steer both the short term and long term development and strategy of the BMRS. It was noted that ISG have experience of BMRS but that they are not specifically experts on the reporting platform. The new Committee should be seen as a user group with limited Panel Committee powers.

It was further clarified that this is not an obligation imposed by the P372 solution but an additional recommendation that the Panel may choose to adopt or not following implementation.

Self-Governance status

The Panel disagreed with the Workgroup that P372 should not be progressed as a Self-Governance Modification.

The Workgroup believed that the solution would be likely to have a material impact on competition (Self-Governance criteria (a) (ii)) by promoting fair and equal access to information and thus exclude it from the Self-Governance route, however Panel members believed that this positive impact did not qualify as a material impact.

It was confirmed that progressing as a Self-Governance Modification would not adversely impact the timescales for implementation.

Following these discussions, Panel members voted and agreed that P372 should be treated as a Self-Governance Modification.

Legal text

One Member queried the removal of an obligation to issue Credit Default notices to Parties from Section V paragraph 4.2.7, noting that this obligation had not been included in the new CSD, unlike all the other removed text.

ELEXON confirmed that, this paragraph required the notices to be published or issued to Parties. Given that the obligation was being discharged by publishing (and not issuing to Parties) it was not seen as necessary to keep this. Further, the removal would have better aligned with the Section M paragraphs cross-referenced in paragraph V4.2.7, which do not mention issuing Credit Default notices to Parties. However, it was agreed by the Panel to keep the original wording in as this would maintain the status-quo and avoid the removal of obligations from the code. The legal text and draft new CSD redlining have been updated following this.

Panel's initial views against the Applicable BSC Objectives

Proposed vs current baseline

The Panel initially **unanimously** agreed that the P372 Proposed Modification **better** facilitated Applicable BSC Objectives (c) and (d), for the reasons given by the Workgroup.

Panel's views on draft legal text

The Panel initially **unanimously agreed** that the draft redlined changes to the BSC for P372 in Attachment A delivers the intention of P372, noting the minor change described above.

Panel's views on the proposed Implementation Date

The Panel **unanimously agrees** with the Workgroup's recommended Implementation Date for the P372 of 27 June 2019.

Panel's views on Self-Governance

The Panel **disagrees** with the Workgroup that P372 **does not** meet the Self-Governance Criteria as there is no material impact on competition and so should be progressed as a Self-Governance Modification.

9 Report Phase Consultation Responses

P372 was submitted for Report Phase Consultation on 16 April 2019, with responses due by 5pm Wednesday 1 May 2019.

The Report Phase Consultation did not receive any responses, questions or further comments. The consultation was active for a standard 10 Working Days, and industry were reminded to respond.

The low level response was predicted, given that the Assessment Procedure Consultation had only received 1 response which was in favour of the P372 Solution.

10 Recommendations

We invite the Panel to:

- **AGREE** that P372:
 - **DOES** better facilitate Applicable BSC Objective (c); and
 - **DOES** better facilitate Applicable BSC Objective (d);
- **DETERMINE** (in the absence of any Authority direction) that P372 is a Self-Governance Modification Proposal;
- **APPROVE** P372;
- **APPROVE** an Implementation Date of 27 June 2019 as part of the June 2019 BSC Release;
- **APPROVE** the draft legal text;
- **APPROVE** the P372 Modification Report; and
- **NOTE** that the P372 Self-Governance window will expire at 5pm on 30 May 2019.

Workgroup's Terms of Reference

Specific areas set by the BSC Panel in the P372 Terms of Reference	
a)	Which reporting requirements should be moved into Code Subsidiary Documents (CSDs) – is there a criterion to assess against?
b)	Do requirements need to be held in a CSD or could they fall under the governance of an alternative, Panel controlled document?
c)	Are there any requirements which should unequivocally remain in the BSC itself?
d)	How to manage the risk that the Modification results in a significant increase in Balancing Mechanism Reporting Service (BMRS) change?
e)	What are the impacts of implementing low risk changes outside the existing BSC Systems Release schedule?
f)	What changes are needed to BSC documents, systems and processes to support P372 and what are the related costs and lead times?
g)	Are there any Alternative Modifications?
h)	Should P372 be progressed as a Self-Governance Modification?
i)	Does P372 better facilitate the Applicable BSC Objectives than the current baseline?

Assessment Procedure timetable

P372 Assessment Timetable	
Event	Date
Panel submits P372 to Assessment Procedure	13 Sep 18
Workgroup Meeting 1	15 Nov 2018
Workgroup Meeting 2	18 Dec 2018
Assessment Procedure Consultation	27 Feb 2019 – Tuesday 19 Mar 2019
Workgroup Meeting 3	27 Mar 2019
Panel considers Workgroup's Assessment Report	11 April 2019

Workgroup membership and attendance

P372 Workgroup Attendance					
Name	Organisation	15/11 /18	18/12 /18	27/03 /18	
Lawrence Jones	ELEXON (Chair)	✓	✓	✓	
Ivar Macsween	ELEXON (Lead Analyst)	✓	✓	✓	
Tom Edwards	Cornwall Insight (Proposer)	✓	☎	☎	
Andy Colley	SSE	☎	☎	☎	
Paul Coates	RWE Supply and Trading	✓	☎	☎	
Richard Price	National Grid	✓	☎	☎	
Joseph Underwood	Energy UK	✓	☎	☎	
Steve Taylor	Quorum Development Ltd	✗	☎	☎	
Peter Frampton	ELEXON (<i>Design Authority</i>)	✓	✓	✓	
David Stephens	ELEXON (<i>Lead Lawyer</i>)	✓	✓	✗	

290/07

P372
Draft Modification Report

2 May 2019

Version 1.0

Page 30 of 32

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Appendix 2: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronym	
Acronym	Definition
API	Application Programming Interfaces
BMRA	Balancing Mechanism Reporting Agent
BMRS	Balancing Mechanism Reporting Service
BSC	Balancing Settlement Code
BSCP	Balancing Settlement Code Procedure
CSD	Code Subsidiary Document
CVA	Central Volume Allocation
ESO	Electricity System Operator
IDD	Interface Definition Document
ISG	Imbalance Settlement Group
IWA	Initial Written Assessment
NETA	New Electricity Trading Arrangements
NG	National Grid
SCR	Significant Code Review
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group
URS	User Requirement Specification

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	BSC Sections page on the ELEXON website	https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/
3	2013 BSC Review report	https://www.elexon.co.uk/wp-content/uploads/2012/09/215_07_BSC_Review_2013_v1-0.pdf
3	BSC Sections page on the ELEXON website	https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/

290/07

P372

Draft Modification Report

2 May 2019

Version 1.0

Page 31 of 32

© ELEXON Limited 2019

External Links		
Page(s)	Description	URL
3	Business Definition Documents page on the ELEXON website	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/business-definition-documents/
3	Interface Definition Documents page on the ELEXON website	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/interface-definition-documents/
7	Baseline Documents page on the ELEXON website	https://www.elexon.co.uk/documents/bsc-codes/bsc-sections/bsc-baseline-statement/
24	GC109 'The open, transparent, non-discriminatory and timely publication of the generic and user specific values required to be specified by the relevant TSO'	https://www.nationalgrideso.com/codes/grid-code/modifications/gc0113-open-transparent-non-discriminatory-and-timely-publication