

BSC Modification Proposal Form		At what stage is this document in the process?
<h1>P409</h1> <p>Mod Title: Aligning BMRS Reporting Requirements with the Clean Energy Package</p>		<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid green; background-color: #00a651; color: white; padding: 5px; display: flex; justify-content: space-between; align-items: center;">01 Modification</div> <div style="border: 1px solid #00a651; padding: 5px; display: flex; justify-content: space-between; align-items: center;">02 Workgroup Report</div> <div style="border: 1px solid #00a651; padding: 5px; display: flex; justify-content: space-between; align-items: center;">03 Draft Modification Report</div> <div style="border: 1px solid #00a651; padding: 5px; display: flex; justify-content: space-between; align-items: center;">04 Final Modification Report</div> </div>
<p>Purpose of Modification:</p> <p>To align the indicative data reporting deadline with the requirements introduced as part of the Clean Energy Package. Our system functionality already aligns to these requirements, going over and above those defined in BSC Section V; P409 will provide clarity to market participants and have no operational impacts.</p>		
	<p>The Proposer recommends that this Modification should:</p> <ul style="list-style-type: none"> be treated as a Self-Governance Modification Proposal be sent directly into the Report Phase <p>This Modification will be presented by the Proposer to the BSC Panel on 14 May 2020. The Panel will consider the Proposer's recommendation and determine how best to progress the Modification.</p>	
	<p>High Impact: N/A</p>	
	<p>Medium Impact: N/A</p>	
	<p>Low Impact: ELEXON as the Balancing and Settlement Code Company (BSCCo).</p>	

Contents		 Any questions?
1	Why Change?	3
2	Solution	3
3	Relevant Objectives	4
4	Potential Impacts	5
5	Governance	6
Timetable		
The Proposer recommends the following timetable:		
Report Phase Consultation	19/05/2020 - 01/06/2020	
Draft Modification Report presented to Panel	11/06/2020	
Final Modification Report published	15/06/2020	
Self-Governance Appeals Window	11/06/2020 – 02/07/2020	
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1 Why Change?

What is the issue?

As part of the [Clean Energy Package](#), Article 6(13) of [REGULATION \(EU\) 2019/943 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 5 June 2019 on the internal market for electricity](#) ('the Regulation') requires that 'Transmission system operators or their delegated operators shall publish, as close to real time as possible but with a delay after delivery of no more than 30 minutes, the current system balance of their scheduling areas, the estimated imbalance prices and the estimated balancing energy prices'.

The relevant BSC requirement to publish this data is found in [BSC Section V 'Reporting'](#) (2.3.3(b)). The current BSC Section V 2.3.3(b) text requires that 'indicative data', which includes the information listed in Article 6(13) of the Regulation, is published within 45 minutes of the end of the Settlement Period.

ELEXON's systems are currently compliant the requirement in the Regulation, however BSC Section V is not aligned and therefore introduces potential ambiguity for market participants. Section V of the BSC is misaligned to the Regulation, requiring that these items are published within 45 minutes. Therefore Section V should be updated to ensure the BSC is aligned with the Regulation.

2 Solution

Proposed Solution

Update Section V 2.3.3(b) to align with the Regulation, changing the publication deadline for indicative data for a Settlement Period to 30 minutes from the end of the Settlement Period.

There will be no practical impact on the Balancing Mechanism Reporting Agent (BMRA) systems or service provider contract, as they are currently working within a 30 minute deadline according to Service Level agreements in the BMRA Service Description (SD) and User Requirements Specification (URS).

The deadline in the BMRA URS and SD is variable and depends on the length of the Continuous Duration Acceptance Limit (CADL), specified as CADL plus 15 minutes. This means that if CADL were to become longer than 15 minutes the system requirements would no longer require publication within 30 minutes. Updating the BSC text will ensure publication is required within 30 minutes, even if CADL were extended.

Benefits

It is the Proposer's opinion that this Modification will remove any ambiguity as to the BSC's compliance with the Regulation, providing clarity that indicative data for a Settlement Period is being provided within the 30 minutes from the end of the Settlement Period.

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	Neutral
(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System	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	Neutral
(d) Promoting efficiency in the implementation of the balancing and settlement arrangements	Neutral
(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]	Positive
(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	Neutral
(g) Compliance with the Transmission Losses Principle	Neutral

This change maintains alignment with the Regulation, ensuring there is no difference between the text of the BSC and the requirements in Regulation and therefore ensures that the BSC is compliant with European regulation.

4 Potential Impacts

Impacts on Core Industry Documents

Impacted Core Industry Documents			
<input type="checkbox"/> Ancillary Services Document	<input type="checkbox"/> Connection and Use of System Code	<input type="checkbox"/> Data Transfer Services Agreement	<input type="checkbox"/> Use of Interconnector Agreement
<input type="checkbox"/> Master Registration Agreement	<input type="checkbox"/> Distribution Connection and Use of System Agreement	<input type="checkbox"/> System Operator Transmission Owner Code	<input type="checkbox"/> Supplemental Agreements
<input type="checkbox"/> Distribution Code	<input type="checkbox"/> Grid Code	<input type="checkbox"/> Transmission License	<input type="checkbox"/> Other (please specify)

Impacts on BSC Systems

Impacted Systems				
<input type="checkbox"/> CRA	<input type="checkbox"/> CDCA	<input type="checkbox"/> PARMS	<input type="checkbox"/> SAA	<input checked="" type="checkbox"/> BMRS
<input type="checkbox"/> EAC/AA	<input type="checkbox"/> FAA	<input type="checkbox"/> TAAMT	<input type="checkbox"/> NHHDA	<input type="checkbox"/> SVAA
<input type="checkbox"/> ECVAA	<input type="checkbox"/> ECVAA Web Service	<input type="checkbox"/> ELEXON Portal	<input type="checkbox"/> Other (Please specify)	

While the text in theory affects the Balancing Mechanism Reporting Service (BMRS) service requirements, BSCCo has confirmed that the service is not affected in practice as it already publishes the data within 30 minutes, per the requirements in the BMRA SD and URS.

Impacts on BSC Parties

Impacted Parties			
<input type="checkbox"/> Supplier	<input type="checkbox"/> Interconnector User	<input type="checkbox"/> Non Physical Trader	<input type="checkbox"/> Generator
<input type="checkbox"/> Licensed Distribution System Operator	<input type="checkbox"/> National Electricity Transmission System Operator	<input type="checkbox"/> Virtual Lead Party	<input type="checkbox"/> Other (Please specify)

Legal Text Changes

Change text in BSC Section V 2.3.3(b) to read ‘...available within 30 minutes after the end of the relevant Settlement Period’.

5 Governance

Self-Governance

<input type="checkbox"/> Not Self-Governance – A Modification that, if implemented materially impacts:	
<input type="checkbox"/> the Code’s governance or modification procedures	<input type="checkbox"/> sustainable development, safety or security of supply, or management of market or network emergencies
<input type="checkbox"/> competition	<input type="checkbox"/> existing or future electricity consumers
<input type="checkbox"/> the operation of national electricity Transmission System	<input type="checkbox"/> likely to discriminate between different classes of Parties
<input checked="" type="checkbox"/> Self-Governance – A Modification that, if implemented:	
Does not materially impact on any of the Self-Governance criteria provided above	

This Modification does not impact the operation of existing working practice, which is within the requirements of the Regulation. As it does not materially impact on the Self-Governance criteria, we believe it should be progressed as a Self-Governance Modification.

Progression route *(choose one)*

<input type="checkbox"/> Submit to assessment by a Workgroup –:A Modification Proposal which:	
does not meet any criteria to progress via any other route.	
<input checked="" type="checkbox"/> Direct to Report Phase – A Modification Proposal whose solution is typically:	
<input checked="" type="checkbox"/> of a minor or inconsequential nature	<input checked="" type="checkbox"/> deemed self-evident
<input type="checkbox"/> 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:	
<input type="checkbox"/> updating names or addresses listed in the Code	<input type="checkbox"/> correcting minor typographical errors
<input type="checkbox"/> correcting formatting and consistency errors, such as paragraph numbering	<input type="checkbox"/> updating out of date references to other documents or paragraphs
<input type="checkbox"/> Urgent – A Modification Proposal which is linked to an imminent issue or current issue that if not urgently addressed may cause:	
<input type="checkbox"/> a significant commercial impact on Parties, Consumers or stakeholder(s)	<input type="checkbox"/> a Party to be in breach of any relevant legal requirements.
<input type="checkbox"/> a significant impact on the safety and security of the electricity and/or gas systems	

This Modification is of a minor nature to provide clarity that existing working practice meets the requirements of the Regulation We believe that it is self-evident and thus does not require a Workgroup, therefore should be progressed directly to the Report Phase.

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

It is not anticipated that P409 will impact any ongoing SCRs, but we request that ELEXON confirm this with Ofgem prior to submitting their Initial Written Assessment to the BSC Panel.

Does this modification impact on end consumers or the environment?

We do not believe this Modification has any direct impact on consumers or the environment.

Implementation approach

As this is a document only update to the BSC, we believe this should be implemented on 05 November 2020 as part of the November BSC Release to ensure the changes are implemented as soon as possible. This will ensure clarity is provided as soon as practicable.