

## P452 ‘Replacement of Energy Bill Relief Scheme for non-domestic customers with Energy Bill Discount Scheme’

This Modification will enable Elexon (BSCCo) to act as the payment provider for the Government’s Energy Bill Discount Scheme for non-domestic electricity customers. This scheme will replace the existing Energy Bill Relief Scheme.



The BSC Panel recommends **approval** of P452



Ofgem granted P452 as an Urgent Modification Proposal



The BSC Panel **does not** believe P452 impacts the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC

This Modification is expected to impact:

- Suppliers;
- Trading Parties;
- BSCCo.

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## About This Document

This is the P452 Final Urgent Modification Report, which Elexon has submitted to the Authority on behalf of the BSC Panel. It includes the Panel's full views and the responses to the Urgent Modification Consultation. The Authority will consider this report and will decide whether to approve or reject P452.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits/drawbacks and proposed implementation approach.
- Attachment A contains the approved redlined changes to the BSC for P452.
- Attachment B contains the full responses received to the Urgent Modification Consultation.



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### Not sure where to start?

We suggest reading the following sections:

- Have 5 minutes? Read section 1
- Have 15 minutes? Read sections 1, 7 and 8
- Have 30 minutes? Read all sections
- Have longer? Read all sections and the annexes and attachments.
- *You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary](#)*

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## Why Change?

The Energy Bills Discount (EBD) Scheme will run for 12 months from 1 April 2023 to 31 March 2024. This scheme replaces the Energy Bill Relief (EBR) Scheme, which supported business and organisations between 1 October 2022 and 31 March 2023.

The Department of Energy Security and Net Zero (DESNZ) requested BSCCo to act as payment provider, as it was done for the EBR Scheme. Currently, the activities stipulated in [BSC Section C 'BSCCo and its Subsidiaries'](#)<sup>1</sup> do not include provisions for administering this replacement scheme.

## Solution

The proposed solution involves expanding Elexon's (BSCCo) vires to include the administration of the EBD Scheme. This role would involve BSCCo processing Supplier requested payments approved by DESNZ and providing necessary consumption data to DESNZ for the assurance of the scheme, as the payment provider for the Government's EBD Scheme for non-domestic electricity customers. This was also the case the existing EBR Scheme.

## Impacts & Costs

Costs Estimates			
Organisation	Implementation (£)	On-going (£)	Impacts
Elexon	<1k	<2k per month	Updates to two BSC Sections and ongoing reporting and administration of the EBD Scheme.
Industry	£0	0	Feedback from industry via the Urgent Modification Consultation suggests no implementation nor ongoing cost incurred. Low operational impacts involved with utilising existing EBR procedure for the new EBD Scheme.
<b>Total</b>	<b>&lt;1k</b>	<b>&lt;2k</b>	

## The case for Urgency

Ofgem granted P452 'urgent status' on 29 March 2023 as they are satisfied it is related to a current issue that if not urgently addressed, may cause a significant commercial impact upon Parties and consumers, in accordance with its [urgency criteria](#)<sup>2</sup>. The Proposer, National Grid Electricity System Operator (NGESO), requested P452 be treated urgently.

<sup>1</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-c-bscco-and-its-subsidiaries>

<sup>2</sup> <https://www.ofgem.gov.uk/publications/ofgem-guidance-code-modification-urgency-criteria-0>

The Panel agreed and recommended to Ofgem that P452 be treated urgently at an urgent Panel meeting on 28 March 2023.

## Implementation

The Panel recommended P452 be implemented **1 Working Day (WD) following Authority decision**, as part of a special BSC Release

We kindly request a response from the Authority **by 27 April 2023**. This will ensure that the Modification is implemented as soon as possible, as it is required in order for Elexon to act as payment provider for the EBD Scheme, for which the first payment is due in mid-May 2023.

## Recommendation

The Panel unanimously recommends that P452 should be **approved**.

The Panel unanimously believe P452 better facilitates Objective (c) 'competition'. The Panel unanimously believe P452 is neutral (has no impact) against Objective (d) 'efficiency'. However, any neutral views against (d) were outweighed by the benefits against (c), and therefore the Panel were unanimous in believing that P452 should be approved.

The Panel do not believe P452 impacts or extends the EBGL Article 18 balancing terms or conditions. As P452 is progressing on an urgent basis, it must be submitted to Ofgem for decision (not a Self-Governance modification). Furthermore, P452 is believed to materially impact the Self-Governance criteria.

### What is the issue?

Even when the energy prices are falling, they continue to be approximately £500 higher for a dual fuel typical domestic customer than in comparison to the beginning of 2022.

The increase in wholesale energy costs could also have wider economic impacts. There has already been an impact on inflation and the cost of living. It is also possible that the increased energy costs could cause further Supplier failures. Previously, rising wholesale gas costs caused [several Suppliers](#)<sup>3</sup> to fail, in part because they were unable to pass the increasing costs on to customers.

As a result of these concerns the Government proposed the [Energy Bills Relief \(EBR\) Scheme](#)<sup>4</sup> for non-domestic customers, with discounts applied to energy usage initially between 1 October 2022 and 31 March 2023. Through the EBR Scheme, the Government provided a discount on gas and electricity unit prices for non-domestic customers who agreed supply contracts post April 2022.

The activities that Elexon is permitted to undertake are outlined in [BSC Section C 'BSCCo and its Subsidiaries'](#)<sup>5</sup>. To be able to administrate the EBR Scheme, the [Modification P449 'Non-domestic customers Energy Bills Relief Scheme'](#)<sup>6</sup> was implemented extending Elexon's vires.

To continue fostering the economic recovery, the Government decided to extend the EBR Scheme with a replacement programme, the [Energy Bills Discount \(EBD\) Scheme](#)<sup>7</sup>. The scheme will provide some support with energy bills for eligible non-domestic customers in Great Britain.

As in P449, the BSC Section C needs to be changed to expand Elexon's vires to include the administration of the new scheme.

### Urgent Code Modification

An [Urgent Code Modification](#)<sup>8</sup> is a Modification Proposal which is linked to an imminent or current issue that, if not urgently addressed, may cause:

- A significant commercial impact on Parties, Consumers or stakeholders;
- A Party to be in breach of any relevant legal requirements; and
- A significant impact on the safety and security of the electricity/and or gas systems.

An urgent BSC Modification must follow a prescribed timetable approved by Ofgem, as described in [Section F2.9](#)<sup>9</sup>. This approved timetable can be found in Section 6.

<sup>3</sup> <https://www.forbes.com/uk/advisor/energy/failed-uk-energy-suppliers-update/>

<sup>4</sup> <https://www.gov.uk/guidance/energy-bill-relief-scheme-help-for-businesses-and-other-non-domestic-customers>

<sup>5</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-c-bscco-and-its-subsidiaries>

<sup>6</sup> <https://www.elexon.co.uk/mod-proposal/p449/>

<sup>7</sup> <https://www.gov.uk/guidance/energy-bills-discount-scheme#:~:text=The%20Energy%20Bills%20Discount%20Scheme%20will%20run%20for%2012%20months,2022%20and%2031%20March%202023.>

<sup>8</sup> <https://www.ofgem.gov.uk/publications/ofgem-guidance-code-modification-urgency-criteria-0>

<sup>9</sup> <https://www.elexon.co.uk/the-bsc/bsc-section-f-modification-procedures/>

The Proposer, the BSC Panel and Ofgem believe that P452 relates to a current issue that, if unaddressed, will have a significant commercial impact upon Parties and consumers. Specifically, P452 seeks to support Suppliers and non-domestic consumers through the wholesale energy price increase and associated cost of living crisis. The first payment is due in mid-May 2023. P452 should therefore be progressed on an urgent basis to meet this Government set timeline.

## **Desired outcomes**

The desired outcome from this Modification is to enable BSCCo to fulfil the role of payment provider for the Energy Bills Discount Scheme for electricity. Through the scheme, eligible non-domestic customers will receive a per-unit discount to their energy bills during the 12-month period from April 2023 to March 2024.

## Proposed solution

The proposed solution is the same as that of [P449](#), the Modification that introduced the vires for Elexon to undertake the role of Scheme Administrator for the EBR Scheme. The P452 solution would allow Elexon to undertake a role for EBD Scheme, as delegated by the Department for Energy Security and Net Zero (DESNZ). This role would involve BSCCo continuing to process Supplier requested payments approved by DESNZ and providing necessary consumption data reporting for the assurance of the schemes. Calculations and validation of the claims for the EBD Scheme, will continue to be carried out by DESNZ.

Implementing the solution to this Modification will require changes to [BSC Section C 'BSCCo and its Subsidiaries'](#) to extend the vires for Elexon. The amendment would have to allow Elexon to undertake a new non-BSC related function, acting as payment provider for the replacement scheme.

There will also be consequential amendments required to [Section X 'Annex X-1 'General Glossary'](#)<sup>10</sup>. Approved legal text can be found in Attachment A.

The proposed BSC Modification will extend the existing wording in the BSC (that applies to the Energy Bill Relief Scheme) so that it also incorporates the Energy Bill Discount Scheme. The legal text, which is substantially the same as [P449](#), therefore operates in exactly the same way as [P449](#). As a result, the following points (which were part of the [P449](#) Proposal) also apply to P452:

- The Proposed BSC Modification will describe and limit Elexon's role and functions by reference to the same Scheme Functions Agreement and the relevant statutory regulations and rules. The intention of referencing out to these documents is to ensure consistency and prevent divergence between obligations set out in these locations and the BSC. Having the details of the scheme within the Scheme Functions Agreement, rather than the BSC, also ensures that the Government have appropriate control over the scheme and hold the risks as the scheme owner.
- As with the EBR Scheme, the detailed obligations relating to the EBD Scheme will be set out by the Government in statutory regulations and rules. The Secretary of State will delegate these functions to Elexon in respect of the electricity EBD Scheme. The Scheme Functions Agreement, between the Secretary of State and Elexon, will set out the specific functions and obligations of Elexon in respect of the Scheme.
- As Elexon will be performing a separate and distinct role as EBD Scheme payment provider, the proposed Modification provides that the Panel and Panel Committees will not have any responsibilities in respect of Elexon's functions as payment provider.
- The proposed BSC Modification ensures that Scheme payments continue to be accounted for separately from other BSC Costs and Trading Charges and that BSC Parties are not responsible for funding payments under the Scheme. EBD Scheme Amounts may only be used for the purposes of the EBD Scheme, and only EBD Scheme Amounts may be used to make payments for the purposes of

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<sup>10</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-x-1-general-glossary>

the EBD Scheme. The Modification does provide for Elexon's administrative and operational costs in undertaking EBD Scheme functions to be included as BSC Costs payable by Trading Parties via Funding Shares, although as this is a replacement of an existing scheme, no additional costs are expected beyond the administrative costs of operating the EBD Scheme.

## Benefits

The benefits of the Modification would primarily be securing reductions in the electricity bills of non-domestic consumers in Great Britain. This would have a positive impact on the businesses and the economy, reducing the risk of insolvencies and job losses. The Modification would also support Suppliers, reducing the likelihood of Supplier failure due to customer non-payment of bills during the current economic crisis. This would consequently reduce the burden of Supplier failures on those who remain in the market and would have to pick up any mutualisation costs.

## Legal text

[BSC Section C 'BSCCo and its Subsidiaries'](#)<sup>11</sup>, [BSC Section H 'General'](#)<sup>12</sup>, and [Section X 'Annex X-1 'General Glossary'](#)<sup>13</sup> will be impacted by this Modification, with legal text in Attachment A of this document.

Please note that we have included a minor change to Section H, since P452 was presented to the Panel on 28 March 2023.

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<sup>11</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-c-bscco-and-its-subsidiaries>

<sup>12</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-h-general>

<sup>13</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-x-1-general-glossary>



## 4 Applicable BSC Objectives

Applicable BSC 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	<b>Positive</b>
(d) Promoting efficiency in the implementation of the balancing and settlement arrangements	<b>Positive</b>
(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]	Neutral
(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	Neutral
(g) Compliance with the Transmission Losses Principle	Neutral

### Applicable BSC Objective (c)

In the view of the Proposer, this Modification will better facilitate Applicable BSC Objective (c) as it will support the continued operation of Suppliers through the current economic and by extension, industry challenges. It is one of the Government's aims to foster the economy, which was deeply damaged by the COVID-19 crisis first and the energy price crisis later. The EBD Scheme seeks to help non-domestic consumers to pay their electricity bills. This will facilitate more robust competition when market conditions return closer to normal, as it will protect Suppliers from a systemic risk that could result in Suppliers failing. This could be in part due to business customers not being able to pay their energy bills.

### Applicable BSC Objective (d)

The Proposer believes P452 will better facilitate Applicable BSC Objective (d) as Elexon has a unique position within the electricity industry that means it is best placed and most efficient to provide necessary consumption data to DESNZ for the assurance of the scheme and to facilitate payments to Suppliers. Elexon has existing systems and contacts for banking from the EBR Scheme that will be necessary for the first payments to be made on time under the new arrangements as well as established relationships with all licenced Suppliers under the BSC.

Further, the scheme could be expected to reduce the number of Supplier failures that might occur in the absence of the scheme, and Supplier defaults are resource intensive for the BSC Panel and for BSCCo, and therefore reduce the efficiency of the balancing and settlement arrangements. Fewer Supplier defaults will also means lower mutualised costs, and thus improves the efficient operation on the BSC.

The BSC Panel's initial views in response to the Proposer's view on the Applicable BSC Objectives are outlined in section 7 of this document. The Panel agreed with the Proposer views on Objective (c), but were split on Objective (d).

## 5 Impacts & Costs

We have used the following cost categories:

- High: >£1 million
- Medium: £100-1000k
- Low: <£100k

### Estimated costs of P452

No changes are required to BSC Systems. Low implementation cost for Elexon associated with amending the relevant BSC documents. Feedback from industry via the Urgent Modification Consultation suggests that industry will not incur any cost to implement P452.

Ongoing costs for Elexon are expected to be low, associated with maintaining ongoing reporting and administration of the EBD Scheme.

Implementation costs estimates			
Organisation	Item	Implementation costs (£)	Comment
Elexon	Documents	<1k	Costs required to update the relevant BSC Sections to facilitate the proposed solution.
Industry	Systems & processes	0	No expected costs for P452.
<b>Total</b>		<1k	

On-going costs estimates		
Organisation	On-going costs (£)	Comment
Elexon	<2k	Costs associated with maintaining ongoing reporting and administration of the EBD Scheme.
Industry	0	No material costs for P452 – Trading Parties will fund the operation through existing BSC Costs, apportioned by Funding Shares.
<b>Total</b>	<2	

## P452 impacts

Impact on BSC Parties and Party Agents		
Party/Party Agent	Impact	Estimated cost
Supplier	This Modification will positively impact Suppliers as they will receive subsidy payments proportionate to their consumption.	H
Trading Parties	Elxon's administrative and operational costs in undertaking EBD Scheme functions to be included as BSC Costs.	L

Impact on the NETSO	
Impact	Estimated cost
No Impact on NETSO	None

Impact on BSCCo		
Area of Elxon	Impact	Estimated cost
Finance	Updates to internal processes and ongoing operation of the EBRs processes.	L
Analysis and Insight	Development and testing of reporting and ongoing operation of the EBD Scheme processes.	L

Impact on BSC Settlement Risks	
Elxon has not identified any material impacts of this Modification on BSC Settlement Risks, as it will not impact Settlement directly.	

Impact on BSC Systems and process	
BSC System/Process	Impact
N/A	This Modification does not impact any BSC Central Systems. It uses functionality already implemented through previous EBR work.

Impact on BSC Agent/service provider contractual arrangements	
BSC Agent/service provider contract	Impact
N/A	No impact identified.

Impact on Code	
Code Section	Impact
BSC Section C 'BSC and its Subsidiaries'	Updates required to permit Elexon to undertake a new non-BSC related function, acting as payment provider for the replacement scheme.
BSC Section H 'General'	
Section X Annex X-1 'General Glossary'	

Impact on MHHS
Elexon does not believe that this Modification impacts the MHHS Programme.

Impact on EBGL Article 18 terms and conditions
This Modification is not expected to impact or expand the BSC provisions that constitute EBGL Article 18 Terms and Conditions, as described in <a href="#">BSC Section F, Annex F-2</a> <sup>14</sup>

Impact on Code Subsidiary Documents	
CSD	Impact
N/A	No impact

Impact on other Configurable Items	
Configurable Item	Impact
N/A	No impact

Impact on Core Industry Documents and other documents	
Document	Impact
Ancillary Services Agreements	No impact identified.
Connection and Use of System Code	
Data Transfer Services Agreement	
Distribution Code	
Grid Code	
Retail Energy Code	
Supplemental Agreements	
System Operator-Transmission Owner Code	

<sup>14</sup> <https://www.elexon.co.uk/documents/bsc-codes/bsc-sections/bsc-section-f-modification-procedures/>

Impact on Core Industry Documents and other documents	
Document	Impact
Transmission Licence	
Use of Interconnector Agreement	

Impact on a Significant Code Review (SCR) or other significant industry change projects
This proposal is not within the scope of an active SCR. On 28 March 2023, we requested to Ofgem that this Proposal be treated as an SCR-Exempt Modification Proposal. On 28 March, Ofgem confirmed this Modification is SCR-Exempt.



### What are the consumer benefit areas?

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

Impact of the Modification on the environment and consumer benefit areas:	
Consumer benefit area	Identified impact
1) Improved safety and reliability None identified	Neutral
2) Lower bills than would otherwise be the case This Modification would enable the continuance of a scheme that will directly lower applicable non-domestic consumers' bills by providing a subsidy to Suppliers. This would result in lower energy bills than expected in light of the increase in energy cost.	Positive
3) Reduced environmental damage None identified	Neutral
4) Improved quality of service None identified	Neutral
5) Benefits for society as a whole This Modification would continue to enable the facilitation of a scheme that will have a significant impact on the viability of GB businesses in light of the economic crisis, by enabling lower non-domestic energy bills than would otherwise be anticipated. The EBD Scheme will provide support to businesses that will reduce the likelihood of insolvencies and protect jobs. There are also wider benefits to the economy anticipated, as the cost of living crisis has impacts on inflation and the potential for a recession.	Positive

## Recommended Implementation Date

The Panel recommends an Implementation Date for P452 of **1WD following Authority decision**, as part of a special BSC Release.

This will ensure the Modification is implemented as soon as possible, which is required to ensure BSCCo can sign the contract to become the EBD Scheme payment provider, prior to the first payment date for the Scheme in mid-May 2023. We kindly request a response from the Authority by 27 April 2023 in order to be able to make the first payment on time.

## Urgent Progression Procedure and Timetable

The Proposer asked, the Panel recommended and Ofgem approved the below Progression Procedure and timetable for P452.

Urgent Progression Procedure and Timetable	
Event	Date
Modification presented to Panel	28 March 2023
Submitted to Authority for decision on urgency	28 March 2023
Authority decision on urgency	29 March 2023
Urgent Modification Consultation (5WD)	30 March 2023 – 05 April 2023
Draft Urgent Modification Report presented to Panel	13 April 2023
Final Urgent Modification Report submitted to Authority	18 April 2023
Modification implemented	+1WD after Authority decision, and we kindly request a decision by 27 April 2023 to meet the first EBD payment

## Rationale for urgency

Ofgem granted P452 ‘urgent status’ on 28 March 2023 as they are satisfied it is related to a current issue that if not urgently addressed may cause a significant commercial impact on Parties, Consumers or stakeholders.

In Ofgem’s letter, they explain that P452 seeks to facilitate the timely and effective implementation of the EBD Scheme. Further, if P452 is not addressed under Section F2.9 of the BSC (Urgent Code Modifications) on an urgent basis, it will negatively impact the timely and effective introduction of the EBD Scheme, and this will have significant commercial impact on the affordability of energy bills for non-domestic consumers.

The Proposer, National Grid Electricity System Operator (NGESO), requested P452 be treated urgently. The Panel agreed and recommended P452 be treated urgently at an urgent Panel meeting on 28 March 2023 for the reasons given by Ofgem.

## 7 Panel's Initial Discussions

P452 was presented to the Panel at an urgent meeting on 28 March 2023.

The Panel unanimously agreed with the Proposer that P452 should be treated as an Urgent Modification Proposal and recommended the Proposer's urgent timetable and procedure to Ofgem. Ofgem have subsequently agreed with this rationale and approved the recommended urgent timetable and procedure.

At this meeting, the Panel agreed unanimously that P452 better facilitates Applicable BSC Objective (c), in line with the Proposer's rationale.

In regards to the Applicable BSC Objective (d), the Panel were split. Half of the Panel believed P452 did better facilitate Objective (d), for the reasons given by the Proposer. The other half did not believe it better facilitated Objective (d). Of those that did not support (d), half believed it was detrimental against (d) as there was a cost for Elexon to provide the EBD Scheme, which had nothing to do with the balancing and settlement of electricity. The other half were neutral, as they did not believe there was any efficiency benefits. However, those Members that did not hold positive views against (d) believed that (c) outweighed (d) and so the Panel unanimously believed P452 was better than the current baseline and should therefore be approved.

The Panel:

- a) **RECOMMENDED** to the Authority that this Modification should be treated as an Urgent Modification Proposal;
- b) **AGREED** the Urgent progression timetable and procedure for recommendation to the Authority;
- c) **AGREED** that P452:
  - i **DOES** better facilitate Applicable BSC Objective (c);
  - ii **DOES NOT** better facilitate Applicable BSC Objective (d);
- d) **AGREED** that P452 **DOES NOT** impact the EBGL Article 18 Terms and Conditions related to balancing held within the BSC;
- e) **AGREED** an initial recommendation that P452 should be approved;
- f) **AGREED** an initial Implementation Date of:
  - i +1 Working Day after Authority Decision;
- g) **AGREED** the draft legal text;
- h) **AGREED** an initial view that this Modification should not be treated as a Self-Governance Modification; and
- i) **NOTED** that Elexon will issue the Urgent Draft Modification Report for a consultation of 5 Working Days and will present the results to the Panel at the April's meeting, following the closure of the consultation



## 8 Urgent Consultation Responses

P452 was issued for Urgent Modification Consultation on 29 March 2023, closing on 5 April 2023.

We received two responses. Both respondents represented Suppliers. Both respondents were in favour of implementing P452, with one of them highlighting the importance of implementing the solution as early as possible. One of the respondents did note a high impact albeit not related to their operational process, but the impact on Suppliers in general if the Modification is not implemented. One of the respondents noted low on-going cost but not arising from this Modification.

Summary of P452 Urgent Modification Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the Panel's initial unanimous recommendation that the P452 should be approved?	2	0	0	0
Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P452?	2	0	0	0
Do you agree with the Panel's recommended Implementation Date?	2	0	0	0
Do you agree with the Panel's assessment of the impact on the BSC Settlement Risks?	2	0	0	0
Do you agree with the Panel's initial view that P452 should not be treated as a Self-Governance Modification?	2	0	0	0
Do you agree with the Panel's initial recommendation that P452 does not impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?	1	0	1	0
Will P452 impact your organisation?	2	0	0	0
Do you have any further comments on P452?	0	2	0	0

## 9 Panel's Final Discussions

Elxon presented the Urgent Draft Modification Report to the BSC Panel at its meeting on Thursday 13 April 2023.

At this meeting, the Panel agreed unanimously that P452 better facilitates Applicable BSC Objective (c), in line with the Proposer's rationale and feedback from industry.

In regards to the Applicable BSC Objective (d), the Panel unanimously voted neutral (as no impact) against Objective (d), as they did not believe there were any efficiency benefits. However, the Panel noted that while it was neutral against (d), they believed that the benefits from (c) outweighed the views against (d), and so the Panel unanimously believed P452 was better than the current baseline and should therefore be approved.

The Panel:

- a) **AGREED** that P452:
  - i **DOES** better facilitate Applicable BSC Objective (c);
  - ii **DOES NOT** better facilitate Applicable BSC Objective (d);
- b) **AGREED** that this Modification should not be treated as a Self-Governance Modification;
- c) **AGREED** that P452 **DOES NOT** impact the EBGL Article 18 Terms and Conditions related to balancing held within the BSC;
- d) **AGREED** a recommendation that P452 should be approved;
- e) **AGREED** an Implementation Date of:
  - i +1 Working Day after Authority Decision;
- f) **APPROVED** the draft legal text; and
- g) **APPROVED** the P452 Modification Report.

## 10 Recommendations

The BSC Panel recommends to the Authority:

- That P452 should be **approved**:
- That P452 **does not** impact the EBGL Article 18 terms and conditions held within the BSC;
- An Implementation Date for P452 of **1WD** after Authority Decision; and
- The BSC legal text for P452.