

# P453 ‘Amending the Metering Dispensation process, updating AMP/DMP in the CoPs and clarifying the relevant CoP’

This Modification seeks to progress two recommendations from [Issue 93 'Review of the BSC metering Codes of Practice'](#). The first recommendation clarifies the relevant Code of Practice (CoP) for circuits embedded behind the Boundary Point Metering System or Defined Metering Point (DMP). The second recommendation eliminates the need for Metering Dispensations when the Actual Metering Point (AMP) does not coincide with the DMP, but there is no impact on Settlement accuracy.



The BSC Panel initially recommends **approval** of P453



The BSC Panel **does not** believe P453 impacts the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC

This Modification is expected to impact:

- Licensed Distribution System Operators (LDSOs)
- National Electricity Transmission System Operator (NETSO)
- Central Volume Allocation (CVA) and Supplier Volume Allocation (SVA) Meter Operator Agents (MOAs)
- BSCCo (Elexon)

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## About This Document

This is the P453 Draft Modification Report, which Elexon will present to the Panel at its meeting on 11 May 2023. It includes the responses received to the Report Phase Consultation on the Panel's initial recommendations.

There are five 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 P453 Proposal Form.
- Attachment B contains the draft redlined changes to the BSC for P453.
- Attachment C contains the draft redlined changes to the Code Subsidiary Documents (CSDs) for P453.
- Attachment D contains the full responses received to the Panel's Report Phase 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 except section 6
- 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<sup>1</sup>](#)

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## Why Change?

[Issue 93 'Review of the BSC metering Codes of Practice'](#)<sup>1</sup> concluded in June 2022 with the Issue Report presented to the BSC Panel on [8 September 2022](#). The Issue Group highlighted a number of issues, two of which are proposed to be addressed by this Modification:

1. Differences in metering point locations between the AMP and DMP can lead to Metering Dispensation requests, which require significant time and resources to process. If the metering point error, introduced by location, doesn't exceed overall accuracy limits, applying a Metering Dispensation may not be necessary, as it poses no significant risk to Settlement. When the error exceeds overall accuracy limits, compensation can be applied to the meter, but using a generic Metering Dispensation is still challenging and poses a Settlement risk if not validated.
2. The relevant CoP for circuits embedded behind the Boundary Point Metering System or DMP specified in Appendix A of the CoPs is unclear, resulting in different interpretations and Metering Dispensation requests.

## Solution

This Modification proposes to amend [Section L 'Metering' paragraph 3.4](#)<sup>2</sup> to allow Elexon (BSCCo) to approve Metering Dispositions in limited circumstances, update associated [BSCP32 'Metering Dispensation'](#)<sup>3</sup> processes, and explicitly state that a Metering Dispensation won't be necessary when the AMP and DMP don't match but overall accuracy of CoPs <sup>14</sup>, <sup>25</sup>, <sup>36</sup>, <sup>57</sup> and <sup>108</sup> can still be met. The amendment targets paragraph 4.3.3, excludes the exception in Appendix A 5(ii) for power transformers, and makes part of Appendix A (paragraph 1) obsolete. The Modification also clarifies that the relevant CoP for an embedded circuit will be based on the rating of the circuit to be metered, not the CoP that would be relevant if the Metering Equipment were located at the DMP. Settlement integrity will be maintained by consulting affected parties and technical review from Metering Dispensation Review Group (MDRG), Electrical Loss Validation Agent (ELVA), and NETSO or relevant LDSO, as per the procedure outlined in BSCP32 'Metering Dispositions'.

<sup>1</sup> <https://www.elexon.co.uk/smg-issue/issue-93/>

<sup>2</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-l-metering#section-l-3-3.4>

<sup>3</sup> <https://bscdocs.elexon.co.uk/bsc-procedures/bscp-32-metering-dispensations>

<sup>4</sup> [Code of Practice 1 'Code of Practice for the metering of circuits with a rated capacity exceeding 100MVA for Settlement purposes'](#)

<sup>5</sup> [Code of Practice 2 'Code of Practice for the metering of circuits with a rated capacity not exceeding 100MVA for Settlement purposes'](#)

<sup>6</sup> [Code of Practice 3 'Code of Practice for the metering of circuits with a rated capacity not exceeding 10MVA for Settlement purposes'](#)

<sup>7</sup> [Code of Practice 5 'Code of Practice for the metering of energy transfers with a maximum demand of up to \(and including\) 1MW for Settlement purposes'](#)

<sup>8</sup> [Code of Practice 10 'Code of Practice for the metering of energy via low voltage circuits for Settlement purposes'](#)

## Impacts & Costs

Costs Estimates			
Organisation	Implementation (£)	On-going (£)	Impacts
Elexon	<3k	0	Low implementation costs associated with updating the impacted documents. No ongoing costs.
NGESO	0	0	NGESO are not expected to incur any implementation or on-going costs.
Industry	0	0	Any costs or impacts will be highlighted via the consultation.
<b>Total</b>	<b>&lt;3k</b>	<b>0</b>	

## Implementation

The Panel recommended P453 be implemented on **2 November 2023 as part of the standard November 2023 BSC Release**. This approach is to ensure the solution from the Modification is implemented at the earliest opportunity.

## Recommendation

The Panel initially recommends that P453 should be **approved**.

The Panel agreed unanimously that P453 better facilitates Applicable BSC Objective (d), in line with the Proposer's rationale. The majority of the Panel members agreed that P453 better facilitates Applicable BSC Objective (a) for the same reason as the Proposer. The minority felt that P453 was neutral against it. One member noted that changes from P453 will not drastically improve the duties of NETSO thus, saw no positive nor negative impact due to P453.

The Panel **do not** believe P453 impact or extends the EBGL Article 18 balancing terms and conditions. Also, the Panel initially recommends that P453 **should be** progressed as a Self-Governance Modification thus, should not be subject to a decision from the Authority.

### What is the issue?

Issue 93 concluded in June 2022 and the Issue Report was presented to the BSC Panel at its meeting on [8 September 2022](#)<sup>9</sup>. The Issue Group had highlighted a number of issues, two of which are proposed to be addressed by this Modification:

1. The AMP and DMP not coinciding is a primary reason why Metering Dispensations are sought, and the approval process involves significant time and resources from both the Applicant, the relevant BSC Parties and Elexon. Where the errors associated with the difference in metering point location do not cause the Metering System to exceed the overall accuracy limits, then that Metering System poses no significantly greater risk to Settlement than a Metering System located at the DMP. In such cases, the benefits of applying the Metering Dispensation process ([BSCP32](#)<sup>3</sup>) are arguably outweighed by the administrative efforts of processing the application.

When the metering point location errors result in the Metering System exceeding the overall accuracy limits, compensation is applied to the meter for power transformers or line losses (including cable and busbar losses) to bring it within overall accuracy limits. However, utilizing the Metering Dispensation process to achieve this is still challenging, despite it being a common practice for multi-use sites. The administrative efforts for processing the application are inefficient for these standard type cases, and the use of a generic Metering Dispensation would pose a risk to Settlement where loss compensations are not validated.

2. It is unclear in the CoPs what the relevant CoP is for circuits that are embedded behind the Boundary Point Metering System or embedded behind the DMP specified in Appendix A of the CoPs. Different Parties, Party Agents or Equipment Owners are interpreting the requirements differently which can lead to Metering Dispensations being required.

### Background

The metering CoPs detail the technical requirements for Metering Systems. This includes defining the overall accuracy limits for energy measurements used for Settlement purposes. A Metering System must remain within these error limits at, or referred to, the point of connection to the Total System for Boundary Point Metering Systems or the point of connection between two Systems for System Connection Points. This is called the DMP. The DMPs for various kinds of Metering System scenarios are defined in Appendix A of CoPs 1, 2, 3, 5 and 10. The physical location of measurement for a Metering System, the AMP, may not always be located at the DMP, due to practical or financial reasons. Where the AMP and DMP do not coincide (with the exception of the scenarios described Appendix A paragraphs 1 and 5(ii)), section 4.3.3 of CoPs 1, 2, 3 and 5 currently states that a Metering Dispensation is required.

Elexon has received a significant increase in Metering Dispensation applications due to the non-coincidence of AMP and DMP, with around 26% being for multi-use sites since 2021. 14 new battery energy storage systems Balancing Mechanism Units (BMUs) have also



#### What is a Systems Connection Point?

It is a point of connection between two or more Systems excluding points of connection between Distribution Systems in the same GSP Group or a point of connection between Offshore Transmission System User Assets and the Transmission System. There are three types of Systems Connection Points:

- Grid Supply Points (GSPs)
- Offshore Transmission Connection Points (OTCP)
- Distribution Systems Connection Points (DSCPs)

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<sup>9</sup> <https://www.elexon.co.uk/meeting/bsc-panel-330/>

been registered since then, reflecting the push towards Net Zero. While Metering Dispensations differ on a case-by-case basis and may involve additional complications, the AMP and DMP not coinciding is a primary reason why Metering Dispensations are sought.

Processing Metering Dispensations from application to approval, as outlined in BSCP32, is time consuming and requires significant time and resource from the applicant (a BSC Party, or Elexon acting on the behalf of an applicant<sup>10</sup>), Elexon's metering team, the Metering Dispensation Review Group (MDRG), and the relevant BSC Panel Committee(s). Dependent on the quality of the information provided within the Metering Dispensation application form, processing the application to approval can take anywhere between one and six months. In some cases, compensation must be applied to the Metering System. Validating these compensation figures requires further work by, and incurs costs associated with, the Electrical Loss Validation Agent (ELVA).

However, there are cases where the electrical losses associated with the location of the Metering Equipment does not warrant a Metering System to be outside of the overall accuracy limits specified in the relevant CoP. In these instances, the benefits of applying the Metering Dispensation process are arguably outweighed by the administrative efforts of processing the application. If the difference in location between AMP and DMP doesn't cause the Metering System to exceed accuracy limits and compensation isn't needed (excluding transformer errors), then the risk to Settlement is no greater than a Metering System located at the DMP with the same or worse errors.

Developers can have standard designs for multipurpose sites (e.g. extending an existing generation site to include a battery energy storage system, building a new site that will have a combination of generation and battery energy storage) that each require a site specific Metering Dispensation. Compensation for power transformers or line losses may be required for the Metering System to meet accuracy limits. The ELVA validation process mitigates the risk of incorrect compensations being applied, ensuring accuracy for Settlement.

Where, almost identical, sites are each being taken to Panel sub-committees for approval, it is an inefficient process that can delay the site development if, for example, the relevant LDSO won't commit to proceeding unless the Metering Dispensation is approved by the relevant Panel sub-committee.

## Desired outcomes

The desired outcomes of P453 are:

- To clarify in the CoPs what the relevant CoP is for embedded circuits to reduce queries seeking clarification and Metering Dispensations being required where the installer has used Metering Equipment that meets the requirements of the wrong CoP.
- Allow more flexibility for the position of the AMP in the CoPs where it is within overall accuracy limits without the need to apply compensations for power transformers or line losses (including cable losses and busbar losses). This will remove the need for Metering Dispensation applications for location where the dispensation process is adding no value or mitigating any risk to Settlement.

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<sup>10</sup> [P437 'Allowing non-BSC Parties to request Metering Dispensations'](#)

- Make the Metering Dispensation process more efficient for applications for location at multi-use sites where compensation for power transformers or line losses (including cable losses and busbar losses) has to be applied to be within overall accuracy limits. For standard applications, defined with a limited scope, that meet the criteria, allow BSCCo to approve Metering Dispensations. This criteria being where the only deviation from the CoP is location and it is for multipurpose sites metered separately to allow them to be traded and settled separately.

### Proposed solution

This Modification will look to amend [Section L 'Metering' paragraph 3.4](#) to allow BSCCo to approve Metering Dispensations in limited circumstances and define what the criteria is. In addition, the associated BSCP32 processes will be updated to split the process into a Panel sub-committee approval path and a BSCCo approval path. The limited circumstances for BSCCo approval are:

- The application is for location only and the Metering Equipment is compliant with the relevant CoP in all other respects;
- Compensation for power transformers or line losses (including cable losses and busbar losses) to bring the Metering System within overall accuracy limits has been applied; and
- It only applies where two, or more, Metering Systems are, or are to be, registered separately, in either the Central Meter Registration Service (CMRS) or the Supplier Meter Registration Service (SMRS), for Settlement purposes and are sharing a connection to the Total System.

Settlement integrity will be maintained as the solution proposes that affected parties must still be consulted by the applicant and Elexon will notify and request comments from the relevant appropriate parties:

- the MDRG to technically review the application;
- the ELVA will validate the compensation calculations;
- the National Electricity Transmission System Operator (NETSO) or relevant LDSO (as applicable dependant on the point of connection to the Total System) to technically review the application.

This Modification seeks to explicitly state that a Metering Dispensation won't be necessary when the AMP and DMP don't match, but the overall accuracy defined in CoPs 1, 2, 3 and 5 can still be met without compensating for losses in cables, lines, and busbars. The amendment targets paragraph 4.3.3, excluding the exception in Appendix A 5(ii) for power transformers in between.

This solution will render part of Appendix A (paragraph 1) obsolete, as these scenarios will be covered by the solution delivered under this Modification.

This Modification will also clarify in CoPs 1, 2, 3, 5 and 10 (foreword and scope) that the relevant CoP for an embedded circuit will be based on the rating of the circuit that is to be metered and not the CoP that would be relevant if the Metering Equipment were located at the DMP.

### Benefits

This Modification will address the issues identified under Issue 93 and progresses solutions that have been debated and proposed by relevant experts under the Issue Working Groups. It will remove ambiguity around the current relevant CoP requirements,



allow more flexibility for the AMP in the CoPs where overall accuracy can be maintained without compensation, and aid in a more efficient Metering Dispensation process for multipurpose sites facilitating the advancement of Net Zero initiatives.

This Modification will reduce the administrative effort of processing Metering Dispensations that do not adversely impact Settlement, given that the location of the Metering Equipment does not cause the Metering System to be outside overall accuracy as defined in the relevant CoP. The changes will give a clear indication of when a Metering Dispensation is not required in the relevant CoPs.

This Modification will also provide a more efficient process for Metering Dispensation applications for standard multipurpose sites requiring to apply compensation. The solution will provide a more robust process than using a generic Metering Dispensation and will continue to mitigate the risk to Settlement of incorrect compensation being applied. The solution will give more certainty to site developers and Metering Equipment installers and aid in the transition to Net Zero.

The Modification will also provide explicit clarity in the CoP relevant to the circuit where the actual metering is located. This will speed up the “critical friend” role Elexon currently undertakes in processing Metering Dispensations, as the CoPs will:

- Provide clarity to help ensure correct accuracy class Metering Equipment is installed;
- Reduce enquiries and avoid debate about the correct CoP and accuracy classes; and
- Simplify data entry on any Metering Dispensation application form.

Additionally, there is already precedent given in the CoPs for certain situations in which metering away from the DMP does not require a Metering Dispensation (Appendix A paragraph 1 and paragraph 5(ii)), so the solution from the Modification does not go above and beyond the principles that already exist in the CoPs.

## Applicable BSC Objectives

The Proposer believes the Modification Proposal will better facilitate the achievement of Applicable BSC Objectives (a) and (d):

### Applicable BSC Objective (a)

The Proposer's rationale is that through this Modification, the NETSO (who is a stakeholder in the Metering Dispensation process), is likely to receive less Metering Dispensations to review, thus creating more capacity for them to efficiently discharge their obligations.

### Applicable Objective (d)

Through this Modification, BSC Parties will have a better understanding of the scenarios where a Metering Dispensation application is required thus, reducing the number of



#### What are the Applicable BSC Objectives?

(a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence

(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System

(c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity

(d) Promoting efficiency in the implementation of the balancing and settlement arrangements

(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]

(f) Implementing and administering the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation

(g) Compliance with the Transmission Losses Principle

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unnecessary applications being submitted. This ultimately streamlines the Metering Dispensation process, a key process in the balancing and Settlement arrangements.

## Legal text

To implement the desired solution, the following documents will be impacted:

- [BSC Section L 'Metering'](#);
- [Code of Practice 1 'Code of Practice for the Metering of Circuits with a Rated Capacity Exceeding 100MVA For Settlement Purposes'](#);
- [Code of Practice 2 'Code of Practice for the Metering of Circuits with a Rated Capacity Not Exceeding 100MVA For Settlement Purposes'](#);
- [Code of Practice 3 'Code of Practice for the Metering of Circuits with a Rated Capacity not Exceeding 10MVA for Settlement Purposes'](#);
- [Code of Practice 5 'Code of Practice for the Metering of Energy Transfer with a Maximum Demand of Up to \(And Including\) 1MW for Settlement Purposes'](#);
- [Code of Practice 10 'Code of Practice for the Metering of Energy via Low Voltage Circuits for Settlement Purposes'](#); and
- [BSCP32 'Metering Dispensations'](#)

## 4 Impacts & Costs

For the roles that the Proposer and Elexon believe will be impacted, we have indicated whether we believe the costs are likely to be high, medium or low based on the following categories:

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

### Estimated costs of P453

Implementation cost estimates			
Organisation	Item	Implementation (£)	Comment
Elexon	Documents	<3k	Costs required to update the relevant BSC Sections and CSDs to facilitate the proposed solution.
Industry	Systems & processes	Low	A response to the Report Phase Consultation highlighted minimal costs, with impact limited to process and working instructions/staff training, which was in line with existing obligations
<b>Total</b>		<3k	

On-going cost estimates		
Organisation	Implementation (£)	Comment
Elexon	0k	No on-going costs expected.
Industry	0k	No significant on-going costs expected.
<b>Total</b>	0	

## P453 impacts

Impact on BSC Parties and Party Agents		
Party/Party Agent	Impact	Estimated cost
Licensed Distribution System Operator (LDSO)	LDSOs will be expected to update their internal process documents to reflect the changes from this Modification. We expect this Modification to positively impact LDSOs as they will likely have less Metering Dispensation applications to review compared to if the solution from this Modification isn't in place.	L
Central Volume Allocation (CVA) and Supplier Volume Allocation (SVA) Meter Operator Agent	CVA and SVA MOAs will be expected to update their internal process documents to reflect the changes from this Modification.	L

Impact on the NETSO	
Impact	Estimated cost
The NETSO will be expected to update their internal process documents to reflect the changes from this Modification. We expect this Modification to positively impact the NETSO as they will likely have less Metering Dispensation applications to review compared to if the solution from this Modification isn't in place.	L

Impact on BSCCo		
Area of Elexon	Impact	Estimated cost
Metering	The Metering Team will have less Metering Dispensation applications to progress compared to if the solution from this Modification isn't in place. The process will become more efficient and require less Panel sub-committee papers to be presented compared to if the solution from this Modification isn't in place.	L

Impact on BSC Settlement Risks	
Elexon doesn't anticipate any impacts on the BSC Settlement Risks.	

Impact on BSC Systems and process	
BSC System/Process	Impact
Metering Dispensation Procedure	For standard multipurpose sites being traded separately the process will be more efficient where a decision is not required by the relevant Panel sub-committee(s).

Impact on BSC Agent/service provider contractual arrangements	
BSC Agent/service provider contract	Impact
N/A	Elxon doesn't believe this Modification impacts BSC Agents/service providers.

Impact on Code	
Code Section	Impact
BSC Section L 'Metering'	Section 3.4 (Metering Dispensations) updated.

Impact on MHHS	
No direct impact on MHHS.	

Impact on EBGL Article 18 terms and conditions	
The change proposed in this Modification will have no impacts on the EBGL arrangements. The draft legal text does not make any change to any BSC paragraphs that constitute EBGL Article 18 Terms and Condition as detailed in the Annex F-2 of the BSC, not does it extend them.	

Impact on Code Subsidiary Documents	
CSD	Impact
<a href="#">BSCP32 'Metering Dispensation'</a>	Process in sections 3.1 and 3.1A updated for BSCCo decision path, BSCP32/4.4 updated, section 1.1 'Purpose and Scope' and 1.2 'Main Users of the Procedure and their Responsibilities' updated to reflect new option and BSCCo responsibilities
<a href="#">Code of Practice 1 'Code of Practice for the Metering of Circuits with a Rated Capacity Exceeding 100MVA For Settlement Purposes'</a>	Foreword, Scope, 4.3.3 ('Compensation for Power Transformer and Line Losses') and Appendix A updated
<a href="#">Code of Practice 2 'Code of Practice for the Metering of Circuits with a Rated Capacity Not Exceeding 100MVA For Settlement Purposes'</a>	

Impact on Code Subsidiary Documents	
CSD	Impact
<a href="#">Code of Practice 3</a> 'Code of Practice for the Metering of Circuits with a Rated Capacity not Exceeding 10MVA for Settlement Purposes'	
<a href="#">Code of Practice 5</a> 'Code of Practice for the Metering of Energy Transfer with a Maximum Demand of Up to (And Including) 1MW for Settlement Purposes'	
<a href="#">Code of Practice 10</a> 'Code of Practice for the Metering of Energy via Low Voltage Circuits for Settlement Purposes'	

Impact on other Configurable Items	
Configurable Item	Impact
No impacts.	

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

Impact of the Modification on the environment and consumer benefit areas:

Consumer benefit area	Identified impact
<p>1) Improved safety and reliability</p> <p>The Proposer believes that this Modification is neutral against this consumer benefit area.</p>	Neutral
<p>2) Lower bills than would otherwise be the case</p> <p>The Proposer believes that this Modification is neutral against this consumer benefit area.</p>	Neutral
<p>3) Reduced environmental damage</p> <p>The Proposer believes that this Modification is neutral against this consumer benefit area.</p>	Neutral
<p>4) Improved quality of service</p> <p>In relation to this Modification, the value achieved is a successful Metering Dispensation application to ensure compliance at the relevant metering site. Streamlining the Metering Dispensation arrangements makes the process of realising that value more efficiently. This in turn promotes a better quality of service to the end consumer.</p>	<b>Positive</b>
<p>5) Benefits for society as a whole</p> <p>The Proposer believes that this Modification is neutral against this consumer benefit area.</p>	Neutral



**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.

### Recommended Implementation Date

The Panel recommends an Implementation Date for P453 of:

- 2 November 2023 as part of the standard November 2023 BSC Release.



## 6 Panel's Initial Discussions

P453 was presented to the BSC Panel at its meeting on Thursday 13 April 2023 (337/08).

The Panel agreed that P453 should progress directly to the Report Phase and did not identify any impact on the EBGL Article 18 terms and conditions held within the BSC. The Panel also agree that an initial recommendation that P453 should be approved and that it should be implemented in the standard November 2023 BSC Release.

### Applicable BSC Objectives

At this meeting, the Panel agreed unanimously that P453 better facilitates Applicable BSC Objective (d), in line with the Proposer's rationale.

The majority of the Panel members agreed that P453 better facilitates Applicable BSC Objective (a) for the same reason as the Proposer. The minority felt that P453 was neutral against it. One member noted that changes from P453 will not drastically improve the duties of NETSO thus, saw no positive nor negative impact due to P453.

### Self-Governance

The Panel unanimously agreed that P453 does not materially impact the Self-Governance Criteria and so should be treated as a Self-Governance Modification.



### What is the Self-Governance Criteria?

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

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

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

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## 7 Report Phase Consultation Responses

This section summarises the responses to the Panel's Report Phase Consultation on its initial recommendations. You can find the full responses in Attachment D.

The Report Phase Consultation was published between 17 April 2023 and 28 April 2023. 1 response from National Grid Electricity Distribution (NGED) was received.

Summary of P453 Report Phase Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the Panel's initial unanimous recommendation that P453 should be approved?	1	0	0	0
Do you agree with the Panel that the redlined changes to the BSC deliver the intent of P453?	1	0	0	0
Do you agree with the Panel's recommended Implementation Date?	1	0	0	0
Do you agree with the Panel's initial view that P453 does not impact the EBGL Article 18 terms and conditions related to balancing held within the BSC?	0	0	1	0
Do you have any comments on the impact of P453 on the EBGL objectives?	0	0	1	0
Do you agree with the Panel's initial view that P453 should be treated as a Self-Governance Modification?	1	0	0	0
Do you have any further comments on P453?	0	1	0	0

The respondent agreed that this Modification should proceed as self-governance and that it should be approved and that the redlined changes delivered the intent of P453 with implementation set for an appropriate date. The respondent identified a minor typo which has since been addressed and has been updated within the redlining. The typo appeared in BSCP 32.

We invite the Panel to:

- **AGREE** that P453;
  - **DOES** better facilitate Applicable BSC Objective (a); and
  - **DOES** better facilitate Applicable BSC Objective (d);
- **DETERMINE** (in the absence of any Authority direction) that P453 is a Self-Governance Modification Proposal;
- **AGREE** that P453 does not impact the EBGL Article 18 terms and conditions held within the BSC;
- **APPROVE** P453;
- **APPROVE** an Implementation Date of:
  - 2 November 2023 as part of the standard November 2023 BSC Release.
- **APPROVE** the legal text;
- **APPROVE** the amendments to the Code Subsidiary Documents; and
- **APPROVE** the P453 Modification Report.