

P461 ‘Accurate Reporting of Customers Delivered Volumes to Suppliers’

The details reported to Suppliers when a customer delivers a Bid Offer Acceptance (BOA) through a Virtual Lead Party (VLP) do not reflect any adjustments made to that data in Settlement. This Modification proposes to address this issue by amending the values reported to Suppliers.



Elexon recommends P461 is progressed directly to the Report Phase with an initial recommendation to approve



Elexon does consider that P461 impacts the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC

This Modification is expected to impact:

- Suppliers; and
- Elexon

Phase
Initial Written Assessment
Definition Procedure
Assessment Procedure
Report Phase
Implementation

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About This Document

You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary](#)¹.

This document is an Initial Written Assessment (IWA), which Elexon will present to the Panel on 12 October 2023. The Panel will consider the recommendations and agree how to progress P461.

There are 3 parts to this document:

- This is the main document. It provides details of the Modification Proposal, the solution, impacts, costs, benefits/drawbacks, proposed implementation approach, and a recommendation of how the Modification should progress.
- Attachment A contains the P461 Proposal Form.
- Attachment B contains the draft redlined changes to the BSC for P461.



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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, 4, 5 and 6
- Have 30 minutes? Read all sections
- Have longer? Read all sections and the annexes and attachments.

¹ <https://www.elexon.co.uk/glossary/?show=all>



P0287 'Secondary Half Hourly Delivered Volumes'

Data sent to a Supplier from a VLP to notify a Supplier of a Metering Systems Half Hourly Volume Adjustments

Why change?

When a customer delivers a Bid Offer Acceptance (BOA) through a Virtual Lead Party (VLP), and provided the customer consents to the disclosure, their Supplier will receive details of the 'Delivered Volume' i.e. the change in the customer's Import and/or Export arising from delivery of the BOA. Currently the details reported to the Supplier are the 'raw' Delivered Volumes reported to the Supplier Volume Allocation Agent (SVAA) by the VLP, and do not reflect any adjustments made to that data in Settlement. This defeats the intended purpose of the reporting by making it impossible for Suppliers to understand the contribution made by each customer to their overall Imbalance charge.

Solution

The Proposed Solution is that values reported to Suppliers on the P0287 'Secondary Half Hourly Delivered Volumes' data flow should incorporate any adjustments made by the Settlement Administration Agent (SAA). This will allow Suppliers to accurately attribute to individual customers any Imbalance adjustments that arise from those customers participating in the Balancing Mechanism through a VLP. This will ensure that Suppliers have the data required to accurately bill customers (in accordance with the terms of their contracts), and minimise cross-subsidies from customers who use a VLP to those who don't (or vice versa).

Impacts and costs

This Modification will require changes to the SAA system and the Data and Calculations Platform (DCP). DCP is one of the IT systems used by the SVAA to implement the calculations described in [Annex S-2 'Supplier Allocation Rules'](#)² of the BSC.

P461 requires a change to [Section T4 'Settlement and Trading Charges'](#)³ of the BSC, which forms part of the EBGL Terms and Conditions listed in [Section F 'Modification Procedures' Annex F-2'](#)⁴ of the BSC. This impact will be consulted on as part of the Report Phase Consultation, with a concurrent EBGL consultation on the P461 proposal to run for one calendar month.

Cost Estimates			
Organisation	Implementation (£)	On-going (£)	Impacts
Elexon	<261k	0	Cost for system updates and document only change.
NGESO	0	0	None anticipated
Industry	0	0	None anticipated
Total	<261k	0	

Implementation

P461 is proposed for implementation on 7 November 2024 as part of the Standard BSC Release. Given the requirement for a one month consultation to assess EBGL impacts and

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² <https://bscdocs.elexon.co.uk/simple-guides/section-s-annex-s-2-supplier-allocation-rules>

³ <https://bscdocs.elexon.co.uk/bsc/bsc-section-t-settlement-and-trading-charges>

⁴ <https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures#annex-f-2>

the necessary lead times to deliver P461, this will allow sufficient time post Ofgem decision to implement the required BSC System changes.

Recommendation

We invite the Panel to:

- **AGREE** that P461 progresses directly to the Report Phase;
- **AGREE** that P461:
 - **DOES** better facilitate Applicable BSC Objective (c);
- **AGREE** an initial view that P461 **should not** be treated as a Self-Governance Modification;
- **AGREE** that P461 **DOES** impact the EBGL Article 18 terms and conditions held within the BSC;
- **AGREE** the impact on the EBGL objectives;
- **AGREE** an initial recommendation to the Authority that P461 should be **approved**;
- **AGREE** an initial Implementation Date of:
 - **7 November 2024** if an Authority decision is received on or before 7 May 2024; or
 - **27 February 2025** if an Authority decision is received after 7 May 2024 but on or before 27 August 2024;
- **AGREE** the draft Legal Text; and
- **NOTE** that Elexon will issue the P461 Draft Modification Report (including the draft Legal Text) for a one month consultation and will present the results to the Panel at its meeting on 14 December 2023.

Background

BSC Modification P344 ([‘Wider Access and Project Terre’](#)⁵) introduced arrangements for customers and generators to participate in the Balancing Mechanism (BM) through an independent aggregator (a ‘Virtual Lead Party’ or VLP) independently of their electricity Supplier. When they do this, the Supplier’s Imbalance Volume is adjusted to remove the effect of any Bid Offer Acceptances (BOAs):

- If a customer reduces their consumption (or increases their generation) of electricity, the Supplier would normally be paid for the additional energy volume through their Energy Imbalance Charge. But when this change in behaviour arises from delivering an Offer through a VLP, the Settlement process removes this volume from the Supplier’s Energy Account, so that they do not receive this additional payment.
- Conversely, if a customer increases their consumption (or decreases their generation) of electricity, the Supplier would normally pay for the additional energy volume through their Energy Imbalance Charge. But when this change in behaviour arises from delivering a Bid through a VLP, the Settlement process adds this volume to the Supplier’s Energy Account, so that they are not required to make this additional payment.

The purpose of these adjustments is to ensure a level playing field between BOAs delivered through a VLP’s Secondary BM Unit, and BOAs delivered through a Primary BM Unit (which do not give rise to Imbalance Charges).

In order to correctly bill their customers, Suppliers will generally want to know the Delivered Volume that each of their customers has provided through a VLP. The exact use to which each Supplier puts this information may vary depending on the terms of their contract with the customer, but typical use cases would include:

- Adjusting payments from (or to) the customer for the energy they use (or generate). For example, if a customer increases their consumption to deliver a Bid, the Supplier is credited with this energy volume through an adjustment to their Energy Account, and therefore does not need to charge the customer for the energy. Note that Modification Proposal P444 ([‘Compensation for Virtual Lead Party actions in the Balancing Mechanism’](#)⁶), if approved, may affect this use case by introducing new payments from and to Suppliers for volumes delivered by their customers; and
- Passing on other costs or charges to customers. For example, some Power Purchase Agreements (PPAs) may require generators to forecast their output, with any deviations from the forecast being settled at the Imbalance Price. The Supplier will need to take any Delivered Volumes into account to avoid unfairly penalising the generator for delivering Bid Offer Acceptances.

In order to facilitate these processes, BSC Modification P344 introduced a requirement (in paragraphs 7.1.7 and 7.2.7 of BSC Annex S-2) for the Supplier Volume Allocation Agent (SVAA) to provide these Delivered Volumes to Suppliers, subject to the VLP having indicated that the customer consents to the disclosure. This information is sent to Suppliers on the ‘Metering System Half Hourly Volume Adjustments’ (P0287) data flow, following each Volume Allocation Run. Where the customer has not consented to SVAA disclosing

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⁵ <https://www.elexon.co.uk/mod-proposal/p344/>

⁶ <https://www.elexon.co.uk/mod-proposal/p444/>

this data, the Supplier may have to obtain Delivered Volume data elsewhere e.g. directly from the customer.

What is the issue?

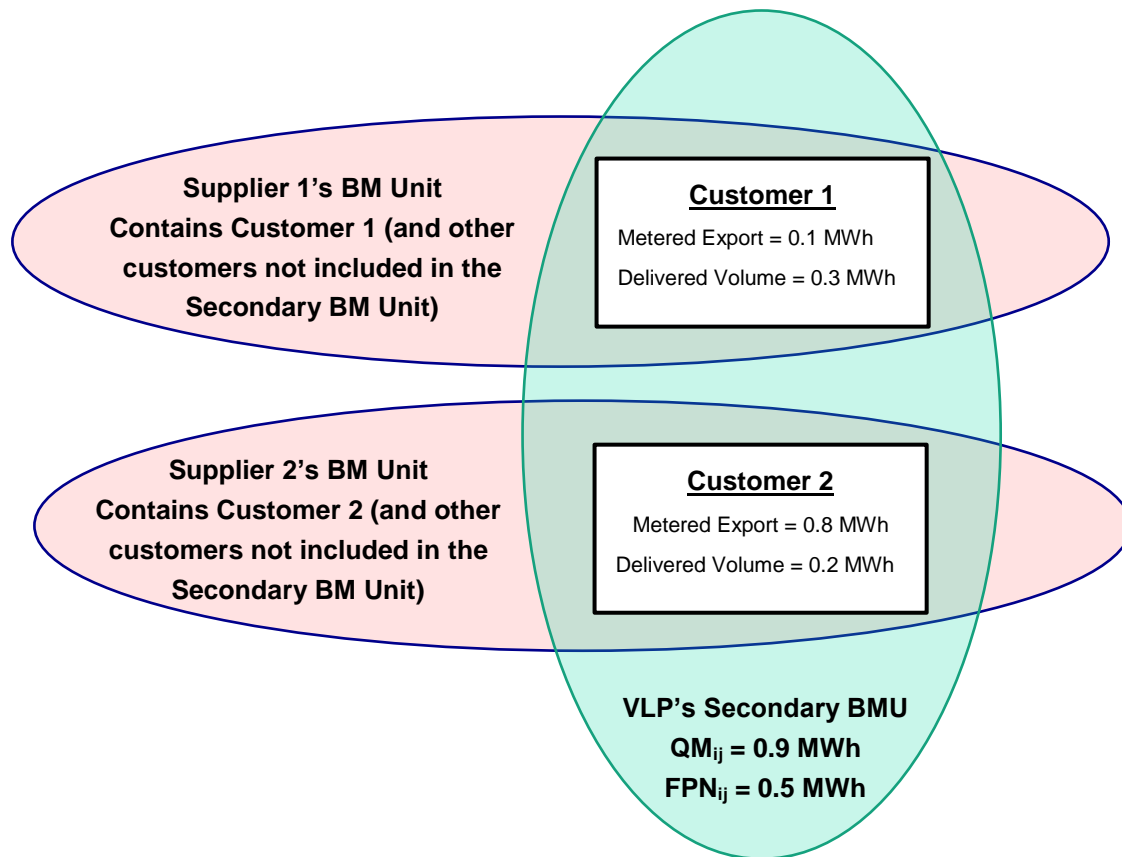
The issue is that the Delivered Volumes reported to the Supplier (in accordance with paragraphs 7.1.7 and 7.2.7 of BSC Annex S-2) are frequently inconsistent with the adjustments made to the Supplier's Imbalance Volume in Settlement. This is a consequence of the data pipeline used to submit Delivered Volume data into Settlement:

1. The VLP reports Delivered Volumes to the SVAA (based on their own assessment of how much energy was delivered through each MSID Pair);
2. SVAA allocates the Delivered Volume between the Import and Export Metering Systems, and reports them to the Settlement Administration Agent (SAA) and (subject to customer consent) the relevant Suppliers. At this stage the Delivered Volumes are still those self-reported by the VLP, and have not been independently verified;
3. The SAA compares the total Delivered Volumes for each Secondary BM Unit to the Period Secondary BM Unit Delivered Volume (QSD_{ij}) calculated in Settlement. Where there is a difference, the Delivered Volume for each Supplier with customers in that Secondary BM Unit will be scaled up or down, so that the total matches the calculated value of QSD_{ij} . As a result, the values of Period Secondary BM Unit Supplier Delivered Volume (QSD_{ij2}) calculated for each Supplier BM Unit 'i' and Secondary BM Unit 'i2' may not be consistent with the data on the P0287 data flow.
4. The QSD_{ij2} values are aggregated to produce the Period Supplier BM Unit Delivered Volume ($QBSD_{ij}$) for each Supplier BM Unit. This value (which is reported to Suppliers on the SAA-I014 Settlement Report) may therefore be inconsistent with the MSID-level data on the P0287 data flow.

For example, consider a Secondary BM Unit containing two customers, each with a different electricity Supplier (as illustrated in Figure 1 overleaf).

In Figure 1, the blue oval represents the Secondary BM Unit, and the green ovals represent the Supplier BM Units. The Secondary BM Unit was instructed to deliver an Offer Volume of 0.5 MWh, and the VLP has indicated that Customer 1 delivered 0.3 MWh of this, and Customer 2 delivered 0.2 MWh. However, the data available to SAA shows that the Secondary BM Unit only delivered 0.4 MWh, as the BM Unit Metered Volume (QM_{ij}) was 0.4 MWh greater than the Final Physical Notification (FPN_{ij}):

Figure 1 – Example of an Offer delivered by a Secondary BM Unit containing customers from two Supplier BM Units



In this example, the Settlement process will be as follows:

1. SVAA will (subject to customer consent) report to the Suppliers that customers 1 and 2 delivered 0.3 and 0.2 MWh respectively.
2. Similarly, SVAA will report to SAA that Suppliers 1 and 2 delivered 0.3 and 0.2 MWh respectively.
3. SAA will calculate the Expected Metered Volume (QME_{ij}) that the Secondary BM Unit was expected to deliver as 1.0 MWh (i.e. 0.5 MWh FPN plus 0.5 MWh Offer Volume). But the Metered Volume (QM_{ij}) was only 0.9 MWh, implying that the Secondary BM Unit only delivered 0.4 MWh of the intended 0.5 MWh. This could have been because one or both of the customers didn't deliver the expected response, or because the VLP's submitted FPN did not accurately estimate what the customers would have done (in the absence of a BOA).

4. As SAA does not know the reason for the VLP's failure to deliver the full Offer volume, it cannot attribute the shortfall to the customer(s) responsible. Instead, in accordance with BSC Section T4.3B, it will scale down the Imbalance Adjustments for each Supplier so that, in total, they match the 0.4 MWh delivered by the BM Unit. In effect the shortfall in the Delivered Volume is shared out *pro rata* between the Suppliers:

	Delivered Volume claimed by VLP and reported on P0287	Delivered Volume QSD _{ij2} after adjustment by SAA
Customer 1	0.3 MWh	0.24 MWh
Customer 2	0.2 MWh	0.16 MWh
Total	0.5 MWh	0.4 MWh

As a result, the Suppliers will not be able to reconcile the data reported on the P0287 with the adjustments to their Imbalance Volume reported to them by the SAA. For example, Supplier 1 would find that the volume reported on the P0287 was 0.3 MWh, while that reported to them on their Settlement Report was 0.24 MWh. This means they will be unable to accurately adjust customers' bills to reflect actions taken in the Balancing Mechanism, or pass through Imbalance Charges to the customers causing them.

Desired outcomes

The desired outcome is that (subject to customer consent) Suppliers are provided with the information required to accurately allocate values of Period Supplier BM Unit Delivered Volume (QBSD_{ij}) calculated by SAA to the individual Metering Systems causing them.



Proposed solution

The Proposed Solution is that values reported to Suppliers on the P0287 data flow should incorporate any adjustments made by the SAA. In the example described above, SVAA would report adjusted values (0.24 and 0.16 MWh) to the Suppliers, rather than unadjusted values (0.3 and 0.2 MWh). The changes to the BSC Legal Text required to achieve this are as follows:

1. Include a new requirement in BSC Section T4.3B for SAA to calculate explicitly the 'adjustment factor' applied to each Secondary BM Unit in each Settlement Period. This data item – the Period Secondary BM Unit Adjustment Factor (SBMUAF_{i2j}) – should be calculated as:

$$\text{SBMUAF}_{i2j} = \text{QSD}_{i2j} / \sum_i \text{VBMUSDV}_{ij2}$$

where \sum_i represents the summation over all Supplier BM Units 'i'.

In the example described above, the value of SBMUAF_{i2j} for the VLP's Secondary BM Unit would be 0.4 / 0.5 = 0.8. This indicates that all of the VBMUSDV_{ij2} values submitted to SAA for that Secondary BM Unit 'i2' were adjusted by a factor of 0.8, in order to match the overall volume delivered by the BM Unit;

2. Include a new requirement in BSC Section T for SAA to report to SVAA the values of SBMUAF_{i2j} for each Secondary BM Unit 'i2' and Settlement Period 'j'; and
3. Amend paragraphs 7.1.7 and 7.2.7 of BSC Annex S-2 to state that values of Secondary Half Hourly Delivered (Non Losses) (VD_{i2NKji}) and Secondary Half Hourly Delivered (Losses) (VDLOSS_{i2NKji}) reported to Suppliers should first be multiplied by the value of SBMUAF_{i2j} (for Secondary BM Unit 'i2' and Settlement Period 'j').

Benefits

This change will allow Suppliers to accurately attribute to individual customers any Imbalance adjustments that arise from those customers participating in the Balancing Mechanism through a VLP. This will ensure that Suppliers have the data required to accurately bill customers (in accordance with the terms of their contracts), and minimise cross-subsidies from customers who use a VLP to those who don't (or vice versa).

Applicable BSC Objectives

BSC Objective (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:

This change is expected to positively impact competition in the sale and purchase of electricity, by providing Suppliers with more accurate information on the actions taken by their customers through VLPs, and allowing them to charge those customers in a way that is cost-reflective and consistent with agreed contractual terms.

Implementation approach

Ellexon recommends an Implementation Date for P461 of:

- **7 November 2024** as part of the standard November 2024 BSC Release if an Authority decision is received on or before 7 May 2024; or

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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- **27 February 2025** as part of the standard February 2025 BSC Release if an Authority decision is received after 7 May 2024 but on or before 27 August 2024.

Given the requirement for a one month consultation to assess EBGL impacts and the necessary lead times to deliver P461, this will allow sufficient time post Ofgem decision to implement the required BSC System changes.

Estimated costs of P461

Costs will be assessed during the Report Phase Consultation. However, for those roles we believe will be impacted, we have indicated in the impacts section 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

Implementation costs estimates			
Organisation	Item	Implementation costs (£)	Comment
Elexon	Systems	170-260k	Cost to update DCP and SAA systems
	Documents	<1k	
	Other		
NGESO	Systems	0	
	Other	0	
Industry	Systems or processes	0	None anticipated, although we will confirm this via the Report Phase Consultation
Total		<261k	

This Modification will require changes to the SAA system and the Data and Calculations Platform (DCP). DCP is one of the IT systems used by the SVAA to implement the calculations described in Annex S-2 of the BSC:

1. Amend the SAA system to calculate and store values of Period Secondary BM Unit Adjustment Factor ($SBMUAF_{i2j}$). This new calculation would be carried out by the part of the SAA system that calculates Period Delivered Volumes for Supplier BM Units;
2. Introduce a new interface for the SAA system to send values of $SBMUAF_{i2j}$ to the DCP, and for DCP to validate and load them;
3. Amend the DCP system to include a process that calculates adjusted values of the MSID-level Delivered Volumes and associated losses (by multiplying the unadjusted values VD_{i2NKji} and $VDLOSS_{i2NKji}$ by the adjustment factor $SBMUAF_{i2j}$); and
4. Amending the DCP system to report the adjusted values (rather than the unadjusted values) on the P0287 data flow sent to Suppliers. Note that this change will require production of the P0287 data flow to be delayed until after the SAA has completed the Settlement Run, and reported $SBMUAF_{i2j}$ values to DCP.

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On-going costs estimates		
Organisation	On-going costs (£)	Comment
Elexon	-	No ongoing costs anticipated
NGESO	-	No ongoing costs anticipated
Industry	L	Delay in receiving data may cause billing delays for some Suppliers which could some costs. This will be clarified through the Report Phase Consultation.
Total	L	

P461 Impacts

Impact on BSC Parties and Party Agents		
Party/Party Agent	Potential Impact	Potential cost
Suppliers	This Modification will positively impact Suppliers by providing them with more accurate data in the 'Metering System Half Hourly Volume Adjustments' (P0287) data flow. There will be no change to the format of the P0287 data flow, but Suppliers will receive it later than they currently receive it (because DCP will now not be able to produce the report until after SAA has performed the Settlement Run to calculate SBMUAF _{12j} values).	L

Impact on the NETSO	
Potential Impact	Potential cost
No impacts anticipated	N/A

Impact on BSCCo		
Area of Elexon	Potential Impact	Potential cost
Elexon	No impacts to any BAU activities outside of the system updates required to implement the change have been identified.	N/A

Impact on BSC Settlement Risks	
No impacts on Settlement Risks are anticipated or identified. However, this will be confirmed through the Report Phase Consultation.	

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Impact on BSC Systems and processes	
BSC System/Process	Potential Impact
SAA	System updates required as detailed above
DCP	System updates required as detailed above

Impact on BSC Agent/service provider contractual arrangements	
BSC Agent/service provider contract	Potential Impact
None	N/A

Impact on Code	
Code Section	Potential Impact
Section S, Annex S-2	Amended 7.1.7 and 7.2.7 to show that Secondary Half Hourly Delivered (Non Losses) and Secondary Half Hourly Delivered (Losses) should be adjusted by the Secondary BM Unit Adjustment Factor before being reported
Section T	Added 4.3B.6 to calculate the Secondary BM Unit Adjustment Factor and then send it to SVAA
Section X-2	Added the new Secondary BM Unit Adjustment Factor into the glossary

Impact on MHHS
No impacts on MHHS have been identified.

Impact on EBGL Article 18 terms and conditions
As described in the Proposed Solution section above, this Modification requires a change to Section T4 of the BSC, which forms part of the EBGL Terms and Conditions listed in Section F Annex F-2 of the BSC. As a result of this a 1 month consultation period has been factored into the Modification timetable.
However, we do not believe this proposal has a direct or material impact on the EBGL provisions and is therefore neutral and consistent against the EBGL objectives.

Impact on Code Subsidiary Documents	
CSD	Potential Impact
None	N/A

Impact on other Configurable Items	
Configurable Item	Potential Impact
None	N/A

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Impact on Core Industry Documents and other documents	
Document	Potential Impact
Ancillary Services Agreements	This Modification is not anticipated to impact any other industry codes.
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 on a Significant Code Review (SCR) or other significant industry change projects

We do not believe this Proposal impacts any open SCRs and have requested it should be treated as a SCR Exempt Modification Proposal.

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 None identified	Neutral
3) Reduced environmental damage None identified	Neutral
4) Improved quality of service The Modification will allow accurate billing to customers which the current solution does not provide.	Positive
5) Benefits for society as a whole None identified	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.

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Next steps

We believe P461 should progress straight to Report Phase with a one month EBGL consultation period – the solution is fully formed and there would be no benefit to forming an industry Workgroup to discuss in further detail as the solution for making the data reported to Suppliers more accurate than currently is clear and self-evident.

Due to P461's impact on the EBGL Article 18 Terms and Conditions, this is not a candidate for Self-Governance. Ofgem will therefore make the final decision on whether to approved P461.

Timetable

Proposed Progression Timetable for P461	
Event	Date
Present Initial Written Assessment to Panel	12 October 2023
Report Phase Consultation (1 month EBGL consultation)	19 October 2023 – 20 November 2023
Present Draft Modification Report to Panel	14 December 2023
Issue Final Modification Report to Authority	20 December 2023

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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6 Recommendations

We invite the Panel to:

- **AGREE** that P461 progresses directly to the Report Phase;
- **AGREE** that P461:
 - **DOES** better facilitate Applicable BSC Objective (c);
- **AGREE** an initial view that P461 **should not** be treated as a Self-Governance Modification;
- **AGREE** that P461 **DOES** impact the EBGL Article 18 terms and conditions held within the BSC;
- **AGREE** the impact on the EBGL objectives;
- **AGREE** an initial recommendation to the Authority that P461 should be **approved**;
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- **AGREE** the draft Legal Text; and
- **NOTE** that Elexon will issue the P461 Draft Modification Report (including the draft Legal Text) for a one month consultation and will present the results to the Panel at its meeting on 14 December 2023.