

Assessment Procedure Consultation Responses

P463 ‘Introduce a Standard Change Process’

E L E X O N

This Assessment Procedure Consultation was issued on 22 April 2024, with responses invited by 13 May 2024.

Consultation Respondents

| Respondent | Role(s) Represented |
|--|---|
| IMServ Europe Ltd | Supplier Agent |
| Anonymous | Non Physical Trader |
| Drax Group plc | Generator, Supplier, ECVNA, MVRNA |
| SSE Energy Supply Limited | Supplier |
| National Grid Electricity Distribution | Distributor |
| RWE Supply and Trading GmbH | Generator, Supplier, Distributor, Interconnector, ECVNA |

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

P463
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Version 1.0

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Question 1: Do you agree with the Workgroup’s initial majority view that P463 does better facilitate the Applicable BSC Objectives than the current baseline?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 4 | 2 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------------|----------|--|
| IMServ Europe Ltd | No | <p>As a workgroup member I repeat the reasons stated in the last meeting as these reflect IMServ’s view as a Party Agent:</p> <p>P463 would not promote efficiency because it would instead add complexity to the arrangements.</p> <p>(1) The appeals process within the Standard Change framework closely mirrors the existing CP process. Consequently, introducing a new process that lacks significant divergence from the current baseline would be inefficient.</p> <p>(2) The need for enabling changes to classify a Standard Change renders the SC process somewhat redundant.</p> <p>(3) With only Fuel types and subsidiary document housekeeping changes on the Standard Change list, it would likely take many years to see a return on the effort to progress P463.</p> |
| Non Physical Trader | Yes | <p>There is a clear benefit to “(d) Promoting efficiency in the implementation of the balancing and settlement arrangements”. Currently, routine, uncontroversial changes like adding a fuel type for a new interconnector are required to go through the full change process. There is little to no input to gather, but the associated workgroups still need to gain members, have consultations and take a needlessly slow and laborious route to delivery. A modern, efficient BSC should have a pathway to deliver these changes quickly for the benefit of all parties and, ultimately, consumers.</p> <p>All other principles are correctly identified as neutral and would be unaffected.</p> |

| Respondent | Response | Rationale |
|--|----------|--|
| Drax Group plc | Yes | We generally agree that the proposals set out in P463 facilitates objective d (of the balancing and settlement objectives) in comparison to the current baseline. The proposal should lead to a more efficient treatment of purely housekeeping changes. |
| SSE Energy Supply Limited | Yes | |
| National Grid Electricity Distribution | No | <p>We feel that P463 would negatively impact Applicable BSC Objective (d) as we feel that it provides little benefit and it offers little difference to the existing Change process and adds complexity.</p> <p>We would also agree with the some of the work group member views that with only Fuel types and subsidiary document housekeeping changes on the Standard Change list, it would likely take many years to see a return on the effort to progress P463.</p> |
| RWE Supply and Trading GmbH | Yes | The Standard change framework should allow change to be implemented in a more timely fashion but still allow for the process of appeal. It should free up the workgroup to make more important change decisions. Based on the example types of change these should be welcomed as a fast track change process. |

Question 2: Do you agree with the Workgroup that the draft legal text in Attachment B delivers the intention of P463?

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 0 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|--|----------|---|
| IMServe Europe Ltd | Yes | No rationale provided |
| Non Physical Trader | Yes | No rationale provided |
| Drax Group plc | Yes | No rationale provided |
| SSE Energy Supply Limited | Yes | No rationale provided |
| National Grid Electricity Distribution | Yes | We agree that the redlined draft legal text delivers the intention of P463. |
| RWE Supply and Trading GmbH | Yes | Agree |

Question 3: Do you agree with the Workgroup that the draft amendments to the CSDs in Attachment C delivers the intention of P463?

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 0 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|--|----------|---|
| IMServ Europe Ltd | Yes | No rationale provided |
| Non Physical Trader | Yes | No rationale provided |
| Drax Group plc | Yes | No rationale provided |
| SSE Energy Supply Limited | Yes | No rationale provided |
| National Grid Electricity Distribution | Yes | We agree that the draft amendments to the CSDs in Attachment C delivers the intention of P463 |
| RWE Supply and Trading GmbH | Yes | Agree |

Question 4: Do you agree with the Workgroup's recommended Implementation Date?

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 5 | 1 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|--|----------|---|
| IMServ Europe | No | We do not support the proposal |
| Non Physical Trader | Yes | No rationale provided |
| Drax Group plc | Yes | No rationale provided |
| SSE Energy Supply Limited | Yes | No rationale provided |
| National Grid Electricity Distribution | Yes | Yes we agree with the workgroups recommended implementation date. |
| RWE Supply and Trading GmbH | Yes | Agree |

Question 5: Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P463 which would better facilitate the Applicable BSC Objectives?

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 0 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|--|----------|---|
| IMServ Europe Ltd | Yes | No rationale provided |
| Non Physical Trader | Yes | No rationale provided |
| Drax Group plc | Yes | No rationale provided |
| SSE Energy Supply Limited | Yes | No rationale provided |
| National Grid Electricity Distribution | Yes | We agree that there are no other alternative modifications within the scope of P463 |
| RWE Supply and Trading GmbH | Yes | Agree |

Question 6: Do you agree with the Workgroup's assessment of the consumer benefits?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 0 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|--|----------|---|
| IMServ Europe Ltd | Yes | No rationale provided |
| Non Physical Trader | Yes | No rationale provided |
| Drax Group plc | Yes | No rationale provided |
| SSE Energy Supply Limited | Yes | No rationale provided |
| National Grid Electricity Distribution | Yes | We agree that P463 is neutral in respect of consumer benefits. |
| RWE Supply and Trading GmBH | Yes | A quicker response and turnaround of minor changes especially ones that are largely configuration would definitely benefit the industry from a consumer perspective. Allowing the working groups to focus on more impactful change. |

Question 7: Do you agree with the Workgroup’s assessment that P463 does not impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 5 | 0 | 1 | 0 |

Responses

| Respondent | Response |
|--|----------|
| IMServ Europe Ltd | Yes |
| Non Physical Trader | Yes |
| Drax Group plc | Yes |
| SSE Energy Supply Limited | Yes |
| National Grid Electricity Distribution | Yes/No |
| RWE Supply and Trading GmbH | Yes |

Question 8: Do you agree with the Workgroup's assessment of the impact on the BSC Settlement Risks?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 5 | 1 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|--|----------|---|
| IMServ Europe Ltd | Yes | No rationale provided |
| Non Physical Trader | Yes | No rationale provided |
| Drax Group plc | Yes | No rationale provided |
| SSE Energy Supply Limited | Yes | No rationale provided |
| National Grid Electricity Distribution | No | <p>We do not agree. Whilst P463 is not amending rules that impact Settlement, there is the potential that a Standard Change could have an unforeseen impact on Settlements, for example we would see a risk if P463 included housekeeping changes. Our concern is where a seemingly insignificant change may result in a significant change to an obligation, for example amending "should" to "shall".</p> <p>We agree with the workgroup that MDD should not be included for P463. There have been incidents where updates to Market Participant Data has created issues, for example, where an Agent MPID was end dated whilst they still had MPANs registered to them. The result was a significant impact to systems as to resolve initially the MPID was reinstated with an EFD 125 days after the Effective To Date. This meant that there was a significant period where there was no valid agent appointment. This error resulted in rejections in the registration systems.</p> |
| RWE Supply and Trading GmbH | Yes | Agree |

Question 9: Will P463 impact your organisation?

Summary

| High | Medium | Low | None | Other |
|------|--------|-----|------|-------|
| 0 | 0 | 4 | 2 | 0 |

Responses

| Respondent | Response | Rationale |
|--|----------|---|
| IMServ Europe Ltd | None | No rationale provided |
| Non Physical Trader | Low | No direct impact, although at the margins it should allow for faster implementation of minor changes and more time to spend on other, non-standard modifications that actually merit in-depth discussion and debate |
| Drax Group plc | Low | As the change should be limited to the fuel types and housekeeping changes, we believe that the impact will be low. If the scope of application were to be extended beyond housekeeping and fuel types changes, then this may have unintended impacts and consequential costs which cannot be reasonably foreseen. This may also result in the need for us to evaluate whether it is necessary to implement changes to our systems and processes. |
| SSE Energy Supply Limited | None | No rationale provided |
| National Grid Electricity Distribution | Low | We would have to introduce new processes and training to understand where a change was a Standard Change and where it did not meet a Standard Change Criteria |
| RWE Supply and Trading GmbH | Low/None | This change should have a low impact on our systems. System wise it should be configuration only changes. |

Question 10: How much will it cost your organisation to implement P463?

Summary

| High | Medium | Low | None | Other |
|------|--------|-----|------|-------|
| 0 | 0 | 1 | 5 | 0 |

Responses

| Respondent | Response | Rationale |
|--|----------|---|
| IMServ Europe Ltd | None | No rationale provided |
| Non Physical Trader | None | No direct impact, although at the margins it should allow more time to spend on other, non-standard modifications that actually merit in-depth discussion and debate. |
| Drax Group plc | None | No rationale provided |
| SSE Energy Supply Limited | None | No rationale provided |
| National Grid Electricity Distribution | Low | No rationale provided |
| RWE Supply and Trading GmBH | None | This change is unlikely to cost my organisation any money to implement. |

Question 11: What will the ongoing cost of P463 be to your organisation?

Summary

| High | Medium | Low | None | Other |
|------|--------|-----|------|-------|
| 0 | 0 | 2 | 4 | 0 |

Responses

| Respondent | Response | Rationale |
|--|----------|--|
| IMServ Europe Ltd | None | No rationale provided |
| Non Physical Trader | None | No direct impact, although at the margins it should allow more time to spend on other, non-standard modifications that actually merit in-depth discussion and debate. |
| Drax Group plc | None | If the scope of the new process is limited to purely housekeeping and fuel types changes then there should be no incremental ongoing cost as a result of this change. |
| SSE Energy Supply Limited | None | No rationale provided |
| National Grid Electricity Distribution | Low | No rationale provided |
| RWE Supply and Trading GmbH | Low | This change will not cause any ongoing cost to my organisation as far as I can see. The low impact nature of subsequent changes are far outweighed by the benefits of seeing new minor changes implemented in a more timely fashion. |

Question 12: How long (from the point of approval) would you need to implement P463?

Summary

| High | Medium | Low | None | Other |
|------|--------|-----|------|-------|
| 0 | 1 | 2 | 3 | 0 |

Responses

| Respondent | Response | Rationale |
|--|-----------------------|--|
| IMServ Europe Ltd | None | No rationale provided |
| Non Physical Trader | N/A | No implementation needed on our end. If anything, it just saves us time reviewing trivial modifications for BAU processes. |
| Drax Group plc | >4 weeks | We do not foresee any more than 4 weeks being needed to implement P463. This lead time would support our work on understanding the criteria that satisfies a standard change process and cascading any changes as a result of P463 being approved. |
| SSE Energy Supply Limited | No required lead time | No rationale provided |
| National Grid Electricity Distribution | 3-6 months | Changes would be limited to process changes and training. No system changes would be required. |
| RWE Supply and Trading GmbH | <1 day | My organisation to the best of my knowledge would need little to no lead time to implement P463. |

Question 13: Do you agree with the Workgroup that Fuel Type changes and Subsidiary Document housekeeping changes meet the Standard Change criteria and so should be included in the P463 solution to follow the Standard Change process?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 5 | 1 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|--|----------|--|
| IMServ Europe Ltd | Yes | N/A |
| Non Physical Trader | Yes | It has always perplexed us that these two changes go through the same process as more material changes. |
| Drax Group plc | Yes | No rationale provided |
| SSE Energy Supply Limited | Yes | No rationale provided |
| National Grid Electricity Distribution | No | We understand and agree with the rational to include Fuel Type but have concerns around Subsidiary Document housekeeping changes. |
| RWE Supply and Trading GmbH | Yes | This seems like minor configuration change. I would be very pleased to see the fuel type change in particular sped through this standard change process. |

Question 14: Do you agree with the proposed minimum notice periods for Fuel Type changes and subsidiary document housekeeping changes?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 5 | 0 | 1 | 0 |

Responses

| Respondent | Response | Comment |
|--|------------|---|
| IMServ Europe Ltd | Yes | No rationale provided |
| Non Physical Trader | No opinion | No rationale provided |
| Drax Group plc | Yes | No rationale provided |
| SSE Energy Supply Limited | Yes | No rationale provided |
| National Grid Electricity Distribution | Yes | No rationale provided |
| RWE Supply and Trading GmBH | Yes | Our systems internally and the new Insights/Iris platform are quickly configurable. |

Question 15: Do you agree with the owning Committee for Fuel Type changes and subsidiary document housekeeping changes?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 4 | 0 | 2 | 0 |

Responses

| Respondent | Response |
|--|------------|
| IMServ Europe Ltd | Yes |
| Non Physical Trader | No opinion |
| Drax Group plc | Yes |
| SSE Energy Supply Limited | Yes |
| National Grid Electricity Distribution | Yes/No |
| RWE Supply and Trading GmbH | Yes |

Question 16: Are there any further changes that you believe could be considered as Standard Changes for inclusion in this Modification?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 1 | 4 | 1 | 0 |

Responses

| Respondent | Response | Comment |
|--|----------|--|
| IMServ Europe Ltd | No | No rationale provided |
| Non Physical Trader | Yes | NESO changes, such as Demand Flexibility Service, that requires Elexon to incorporate new data items on BMRS Adding or supporting additional information within the BMRS |
| Drax Group plc | No | We believe the scope should be limited to housekeeping and Fuel type changes only. Consequential modifications should not be included in scope as there may be different options, costs and benefits, that should be assessed as part of a full modification process when implementing a consequential modification. |
| SSE Energy Supply Limited | No | We agree that market domain data changes should not be included as Standard Changes in this modification. |
| National Grid Electricity Distribution | Yes/No | No rationale provided |
| RWE Supply and Trading GmbH | No | I cannot think of any further changes presently. |

Question 17: Do you agree with the Workgroup that an appeal mechanism is needed in both process 3.16 and 3.17 as drafted in BSCP40?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 0 | 0 | 0 |

Responses

| Respondent | Response | Comment |
|--|----------|--|
| IMServ Europe Ltd | Yes | No rationale provided |
| Non Physical Trader | Yes | No rationale provided |
| Drax Group plc | Yes | The appeal mechanism provides clarity and a standardised approach to appealing any such change. |
| SSE Energy Supply Limited | Yes | No rationale provided |
| National Grid Electricity Distribution | Yes | No rationale provided |
| RWE Supply and Trading GmbH | Yes | Checks and balances are always welcome in any process so long as they aren't misused to just delay change. |

Question 18: Do you have any further comments on P463?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 2 | 4 | 0 | 0 |

Responses

| Respondent | Response | Comment |
|---------------------------|----------|---|
| IMServ Europe Ltd | No | No rationale provided |
| Non Physical Trader | No | <p>We agree with the proposed criteria for standard changes. For the other potential Standard Change candidates identified, we note that addition of new data items and flows are more likely to be low risk than removal or deprecation of elements of existing data flows because the latter potentially affects existing business processes. Nonetheless, sometimes the latter is unavoidable, such as when an external process (e.g. NESO product specification) has changed in such a way that the existing Exelon configuration is no longer appropriate</p> <p>We thank you for the opportunity to comment.</p> |
| Drax Group plc | Yes | <p>While we agree that P463 introduces a simplified method of implementing low risk, repeatable and predictable changes and allows for participants to focus on higher value modifications, there is a risk that additional unforeseen and potentially impactful changes and modifications may become commonplace within this change process.</p> <p>For instance, where a modification at its initial stage may meet the criteria for a standard change process, there is a possibility that further modifications and changes are necessary to accommodate these standard changes. This, therefore, may have implications on costs and processes for parties. Should P463 be an agreed change process, applications for standard changes must be safeguarded against these scenarios at each stage of the change application process in the absence of consultation. With this in mind, we support process 3.5.3- as drafted in BSCP40 that in the event a material impact is identified during the Impact Assessment, the panel may recommend that the change be re- circulated to the industry for further impact assessment.</p> |
| SSE Energy Supply Limited | Yes | It is unlikely that there will ever be any net benefits of implementing P463 that exceed the industry costs in developing the modification. This is because very few |

| Respondent | Response | Comment |
|--|----------|---|
| | | modifications are likely to fall into the standard change process in the next few years, and the standard change process is likely to become redundant when the BSC code manager is appointed as a result of the energy industry code governance reforms. |
| National Grid Electricity Distribution | No | No rationale provided |
| RWE Supply and Trading GmbH | No | No rationale provided |

P463 Redlined Legal Text

If you answered 'No' to **Question 2**, please use this section to record any specific comments you have against the P463 BSC Section draft redlining, including the specific section and paragraph that each comment applies to. You can add further rows to any tables as required.

| Insert BSC Section here | |
|-------------------------|---------|
| Location | Comment |
| No rationale provided | |
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| Insert BSC Section here | |
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P463 Redlined CSD Text

If you answered 'No' to **Question 3**, please use this section to record any specific comments you have against the P463 CSD draft redlining, including the specific section and paragraph that each comment applies to. You can add further rows to any tables as required.

| Insert CSD here | |
|-----------------------|---------|
| Location | Comment |
| No rationale provided | |
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| Insert CSD here | |
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