Assessment Procedure Consultation

P463 ‘Introduce a Standard Change Process’

To introduce a new change process - a ‘Standard Change’ process - into the BSC arrangements that would allow for certain, low risk, predictable and repeatable pre-authorised changes to be implemented without following the existing Change Proposal or Modification procedures. This should reduce the burden on industry and Elexon; allowing them to focus on higher value activities.

This Assessment Procedure Consultation for P463 closes:

5pm on **Monday 13 May 2024**

The Workgroup may not be able to consider late responses.

The P463 Workgroup initially recommends **approval** of P463

The P463 Workgroup **does not** believe P463 impacts the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC

This Modification is expected to impact:

- Parties
- Party Agents
- Insight users
- Elexon

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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].

The purpose of this P463 Assessment Procedure Consultation (AC) is to invite BSC Parties and other interested parties to provide their views on the merits of P463. The P463 Workgroup will then discuss the consultation responses, before making a recommendation to the BSC Panel at its meeting on 13 June 2024 on whether or not to approve P463.

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. It also summarises the Workgroup's key views on the areas set by the Panel in its Terms of Reference, and contains details of the Workgroup's membership and full Terms of Reference.
- Attachment A contains the P463 Proposal Form.
- Attachment B contains the draft redlined changes to the BSC for P463.
- Attachment C contains the draft redlined changes to the Code Subsidiary Documents (CSDs) for P463.
- Attachment D contains the specific questions on which the Workgroup seeks your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish the Workgroup to consider.

[1] https://www.elexon.co.uk/glossary/?show=all

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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 and 7
- Have 30 minutes? Read all except section 6
- Have longer? Read all sections and the annexes and attachments.

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1 Summary

Why Change?

Currently, all changes to the BSC and BSC Configurable Items are required to go through the Change Process, either as a Modification Proposal (Mod) or as a Change Proposal (CP). Although these processes are very effective, there are some instances in which the process may be considered overly bureaucratic and burdensome for impacted stakeholders. A number of routine and low risk changes, and changes to standing data have been identified where public consultation and Committee approval may be considered disproportionate and unnecessary. A more efficient process should be used for these Change types.

Solution

Introduce a simplified change process to streamline those changes which are low risk, routine and repeatable, a 'Standard Change' process. This will reduce the burden on industry and Elexon for processing these kinds of changes. There are two key elements to the P463 solution:

1. **The Standard Change framework**, as substantially set out in BSCP40 and introduces two new processes:

    a. A process to classify a change as a Standard Change, which requires all requests to be consulted on and approved by the Panel, where they meet the Standard Change criteria (low risk, repeatable and predictable). In addition to Panel approval, requests cannot follow the Standard Change process unless any required 'enabling changes' have also been approved and implemented.

    b. A Standard Change process for changes that have completed and been approved as Standard Changes under the classification process above.

    An appeal route is available under both processes. Details of requests under both processes are captured in logs, published on the BSC Website and have notifications to industry at important milestones, such as consultations and Panel decisions. Each type of Standard Change is subject to a minimum period of time, not less than 16 Working Days (WDs) that must be notified to industry before a Standard Change is implemented.

2. **Standard Change candidates**: The Workgroup is proposing to move two change candidates from their existing change processes to the Standard Change process.

    The P463 legal text therefore includes legal text to move Fuel Type changes and housekeeping changes to CSDs to the follow the Standard Change process (instead of the CP and housekeeping CP processes respectively).

It is important to note that the Standard Change framework includes a process (1a above) to move other change types to the Standard Change process. P463 is therefore proposing to include these two types at P463 implementation, but also allows other change types to be added at a later date. The Workgroup also considered whether Market Domain Data

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(MDD[2]) changes should become a Standard Change, but do not believe the MDD changes meet the Standard Change criteria.

Impacts & Costs

We do not anticipate any impacts on market participants from introducing the Standard Change framework. Elexon will need to implement this new framework and update its internal processes and customer guidance.

Moving Fuel Type and housekeeping changes to CSDs to the Standard Change process will reduce the effort for Elexon but will have negligible impacts for market participants as they will still need to assess these changes and respond accordingly. The implementation activities for Elexon and market participants remain unchanged as a result of this Modification and we therefore believe it will be a document-only change (no system impacts). We welcome validation of this assessment as part of this consultation.

Cost Estimates			
Organisation	Implementation (£)	On-going (£)	Impacts
Elexon	1k to 2k	~3.5k to 5k savings per year	Implement changes to the BSC documents and update internal processes. Savings from progressing Fuel Type and CSD housekeeping changes via Standard Change process.
NGESO	0	0	None identified
Industry	0	0	None identified
Total	1k to 2k	3.5k to 5k	

Implementation

The Workgroup propose that P463 is implemented **five Working Days** (+5 WDs) after Authority decision, as a Special BSC Release.

Recommendation

The Workgroup's initial majority view is that P463 **does** better facilitate Applicable BSC Objective (d) 'Promoting efficiency in the implementation of the balancing and settlement arrangements' and, therefore, initially recommends **P463 for approval**. The Workgroup has not identified any impacts on the EBGL or on consumers or the environment.

Assessment Consultation Questions
Do you agree with the Workgroup's initial majority view that P463 does better facilitate the Applicable BSC Objectives than the current baseline?
The Workgroup invites you to give your views using the response form in Attachment D

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[2] https://www.elexon.co.uk/data/market-domain-data/

2 Why Change?

What is the issue?

All changes to the BSC and BSC Configurable Items (documents and systems detailed in the BSC Baseline Statement) currently require either a Mod or a CP to amend them. These well established, controlled change processes have worked well for many years. However, for certain types of changes, these processes may be overly bureaucratic and burdensome for impacted stakeholders, especially where certain changes have become routine and low risk. Furthermore, many changes to BSC standing data require public consultation and Committee approval, which may not always be proportionate or necessary. A more efficient process, for certain types of changes should therefore be introduced into the BSC.

Background

The concept for this Proposal has been based on the Standard Change or Routine Change model in ITIL[3] (Information Technology Infrastructure Library). ITIL is a framework designed to standardise the selection, planning, delivery, maintenance and overall lifecycle of IT services within a business. ITIL defines a Standard Change as "a pre-authorised change that is low risk, relatively common and follows a specified procedure or work instruction."

A standard change is one that is frequently implemented, has repeatable implementation steps, and has a proven history of success.

Elexon presented the idea for this Proposal at the June 2023 Panel meeting (339/02[4]) within the context of simplifying and speeding up the approval and publishing of new Fuel Types on the Balancing Mechanism Reporting Service (BMRS)/Insights. This was based on the following evidence:

- Fuel Type changes are well understood, low risk and low impact, as evidenced by consultation responses and repeated successful implementations.
- These changes will become simplified (lower risk and more predictable) once our new Insights platform[5] (the new Kinnect system) officially replaces the legacy BMRS system, as Fuel Type changes will be a configuration, rather than a functional code-based change on Insights.
- The last four Fuel Type consultations have had 1 to 2 responses, with all but one from either NGESO or the impacted Interconnector and have always fully supported the change. Since P463 was raised CP1593 was raised to implement a new Fuel Type and received no consultation responses.
- The Imbalance Settlement Group (ISG) and the Panel have not had any material comments on these changes for at least the last five years.

The Panel were supportive in principle of this idea and so Elexon subsequently worked up this proposal and some strawman redlining.

Fuel Types

Fuel types refer to the different ways in which fuel is generated and subsequently reported on the BMRS.

The different fuel types are identified during reporting by pre-determined code practices.

[3] https://www.itlibrary.org/
[4] https://www.elexon.co.uk/meeting/bsc-Panel-339/
[5] https://bmrs.elexon.co.uk/

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At the Panel meeting on 9 November (344/03[6]), Elexon invited and the Panel agreed to raise this Modification Proposal (in accordance with Section F2.1.1(d)(i) – which allows the Panel to raise a Modification proposal on the recommendation from Elexon where the Panel believe the Proposal will better facilitate Applicable BSC Objective (d)), as it would better facilitate efficiency in the implementation and administration of the BSC, by allowing certain changes to be progressed more efficiently, reducing the burden for industry and Elexon.

Desired outcomes

- Introduce a simplified change process for certain types of changes that meet pre-defined criteria – a Standard Change Process.
- Reduce the burden on industry and Elexon for progressing these types of changes.
- Identify which types of changes could follow the Standard Change process, and which of these, if any, should be included within this Modification Proposal (i.e. any enabling changes needed for a change to follow the Standard Change process).

[6] https://www.elexon.co.uk/meeting/bsc-Panel-344/

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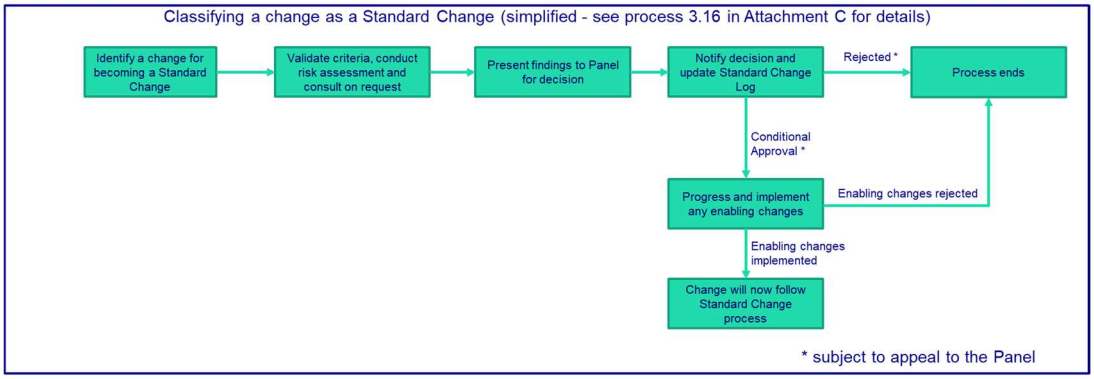
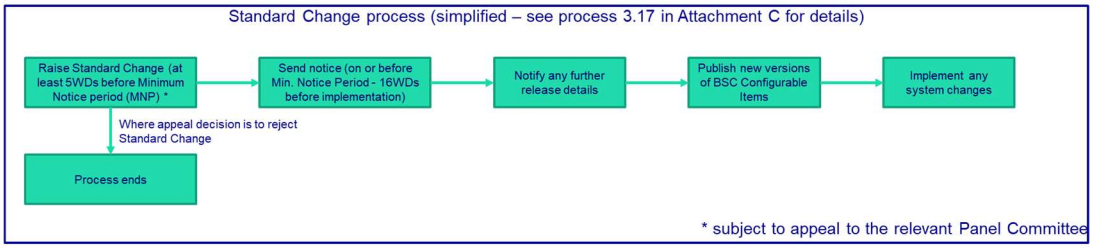
3 Solution

Proposed solution

In order to address the issue identified in this proposal, a Standard Change framework has been drafted. There are two key processes, detailed in BSCP40 (Attachment C) and summarised in the process maps below.





As drafted, any interested person may raise a request to classify a change type to follow the Standard Change process or raise a Standard Change. Similarly, any interested person may appeal the decision under the classification or the Standard Change process. BSCCo is able to reject frivolous and vexatious proposals, subject to Panel appeal.

Updates to BSC Section F[1] 'Modification Procedures' have been drafted to recognise the Standard Change process and detail the criteria that must be met in order for change types to be classified a Standard Change. The detailed Standard Change process is outlined in BSCP40 'Change Management'[2] and can be seen in Attachment C.

We outline the core components of the proposed solution in the table below and how these meet the desired outcomes.

Desired Outcome	Solution
Introduce a simplified change process for certain types of changes that meet pre-defined criteria – a Standard Change Process	Standard Change criteria have been drafted and are included in Section F. This will sit in Section F so that it may only be changed via a Modification.

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Desired Outcome	Solution
	A Standard Change log will be created to catalogue the details of any changes that have been requested to follow the Standard Change process. Where requests are approved, the log will also capture the minimum notice period and which Panel Committee (including the Panel itself) will own that change type. This is relevant if an appeal is raised against a Standard Change.
	A minimum notice period defines the minimum required advance notice that Elexon must provide for that specific type of change before implementing it. The drafting allows for this period to be amended.
	An appeals process has been drafted to appeal the Panel's decision regarding categorisation of a change as a Standard Change.
	The drafting also allows for changes to be reverted from the Standard Change process back to their previous change process, subject to consultation and Panel approval.
Reduce the burden on industry and Elexon for progressing these types of changes	A Standard Change Framework has been drafted in BSCP40 – Attachment C.
	The process aims to establish a change type as a Standard Change, allowing all subsequent changes of that type to proceed to implementation without requiring consultation or committee approval.
Identify which types of changes could follow the Standard Change process, and which of these, if any, should be included within this Modification Proposal (i.e. any enabling changes needed for a change to follow the Standard Change process).	Enabling changes have been identified for inclusion in this Mod. They are: Fuel Type changes and Subsidiary Document housekeeping.
	The enabling change for Fuel Type changes can be seen in the redlining in Section Q – Attachment B and the Subsidiary Document housekeeping redlining can be found in BSCP40 in Attachment C.

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The criteria that must be met for a change to be classified as a Standard Change are:

Criteria
Low risk: A change is considered low risk when it has a minimal or negligible chance of causing adverse effects to Settlement and the IT environment or the business processes it supports for both BSC central systems and participants. The consequence of failure, if it occurs, is minimal.
Repeatable: This relates to the ability to implement the change consistently over and over again without variations in the process or outcome. For a change to be considered standard, it must be repeatable. This means that the same steps are followed each time
Predictable: This pertains to the expected outcomes of implementing the change. A predictable change is one where the outcome is known, based on previous implementations or thorough testing. There shouldn't be any surprises when the change is made.

Assessment Consultation Question
Do you agree with the Workgroup that the draft legal text in Attachment B delivers the intention of P463?
Do you agree with the Workgroup that the draft amendments to the CSDs in Attachment C deliver the intention of P463?
The Workgroup invites you to give your views using the response form in Attachment D

Enabling Changes

Fuel Type changes

Currently, Fuel Type changes must be progressed via a Change Proposal, which amends the NETA Interface Definition Document (IDD), a data flow specification. Furthermore, Section Q requires that the Panel approves all changes to Fuel Types. For efficiency we therefore ask the Panel to approve the CP and the Fuel Type change together. P463 proposes to remove the need to issue a CP and seek Panel approval. Instead, a Standard Change would be raised. **Elexon and the Workgroup propose that the minimum notice period should be 3 months and that the Imbalance Settlement Group (ISG)[7] should own Fuel Type changes.** This will reduce the lead time for implementing Fuel Type changes (where Elexon now only needs approximately two weeks to implement such a change, since moving to its new Insights platform) by at least three months (50% reduction) and save approximately eight days effort per Fuel Type change.

Subsidiary document housekeeping changes

Currently, to resolve housekeeping errors in the BSC subsidiary documents, a Housekeeping CP is raised. P463 proposes to remove the Housekeeping CP process and instead use the Standard Change process to resolve these types of error. The definition of a housekeeping change would remain the same i.e. the scope of what is considered housekeeping is not proposed to be changed. **Elexon and the Workgroup propose that the minimum notice period should be 16WDs and that the Panel should own Housekeeping changes.** This will not significantly reduce the lead time (as Housekeeping CPs can also be implemented 16WDs after approval), but will save at least 3.5 days effort per change.

What is a housekeeping change?

Housekeeping Change – involves the correction of manifest errors, minor errors and inconsistencies, including typographical errors (e.g. punctuation errors, spelling mistakes, incorrect font, incorrect capitalisation) incorrect cross-referencing, and the removal of redundant text.

[7] https://www.elexon.co.uk/groups/imbalance-settlement-group/

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Benefits

The Standard Change framework, when implemented, does not inherently yield any advantages. Benefits materialise only when changes are classified as Standard Changes and subsequently adhere to the Standard Change process. The primary benefit lies in the decreased assessment time for relevant changes, while implementation activities remain unchanged.

The main benefits that this Modification Proposal sets out to realise are:

- Reduced burden for industry monitoring and responding to consultations for Fuel Type changes and housekeeping for Subsidiary Documents, which elicit little or no response, either due to no impact or full support;
- Reduced burden for Elexon and the Panel and Panel sub-Committees, as they will no longer need to approve these changes; and
- Enable further reductions in effort over time, where more change types are added to the Standard Change process.

P463 seeks to include enabling changes to make Code Subsidiary Document housekeeping changes and Fuel Type changes a Standard Change. A cost/benefit analysis indicates that this would result in a net gain of 11.5 days per year for industry and Elexon. Further benefits are anticipated as the catalogue of Standard Changes grows but this benefit is dependent on which Changes are identified in the future.

Standard Change Candidate				
Standard Change Candidate	**Elexon Assessment Effort Reduction (days)**	**Industry Assessment Effort Reduction (days)**	**Assumed number of changes per year**	**Total**
Fuel Types	7 – CP will no longer need to be progressed	1 – Only need to review Standard Change notice, not CP and implementation	1	8
Subsidiary Document housekeeping	3	0.5	1	3.5
Total	10.5	1.5	2	11.5

Alternative solution

The Workgroup did not identify an Alternative Modification Proposal. However, they are considering whether to keep the appeal mechanisms. They have considered either:

1. Removing the appeal mechanism from one or both of the processes in BSCP40 (processes 3.16 ‘Classifying a change as a Standard Change’ and 3.17 ‘Standard Change Process’); or
2. Changing the appeal mechanism in 3.17 ‘Standard Change Process’ so that, on appeal, the change would revert to a CP.

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The Workgroup welcome your views on these possible Alternatives and whether they would be better than the Proposed solution. They will use responses to this consultation to finalise the solution and any possible Alternative.

Assessment Consultation Question
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?
The Workgroup invites you to give your views using the response form in Attachment D

Legal text

The proposed redlining can be seen in Attachment B and Attachment C.

Item	Redlining
Section F	Enables the Standard Change Process and details the criteria that must be met for a change type to be added to the Standard Change Log
Section Q	Enabling changes to make Fuel Types a Standard Change
Section X-1	Glossary updated to define 'Standard Change' as a pre-authorised type of change designed for routine changes as set out in BSCP40
BSCP40	Details the Standard Change processes and introduces several new defined terms and BSCP forms. BSCP40 has also been updated to allow Subsidiary Document housekeeping changes to follow the Standard Change process

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4 Implementation

Recommended Implementation Date

The Workgroup recommends an Implementation Date for P463 of:

- 5 Working Days after Authority decision as a BSC Special Release.

Given the expected impacts and low levels of implementation activities, P463 is suitable for implementation at the earliest opportunity. The Workgroup therefore opted for implementation as soon as practical after Authority decision so that the benefits could be realised.

Assessment Consultation Question
Do you agree with the Workgroup's recommended Implementation Date?
The Workgroup invites you to give your views using the response form in Attachment D

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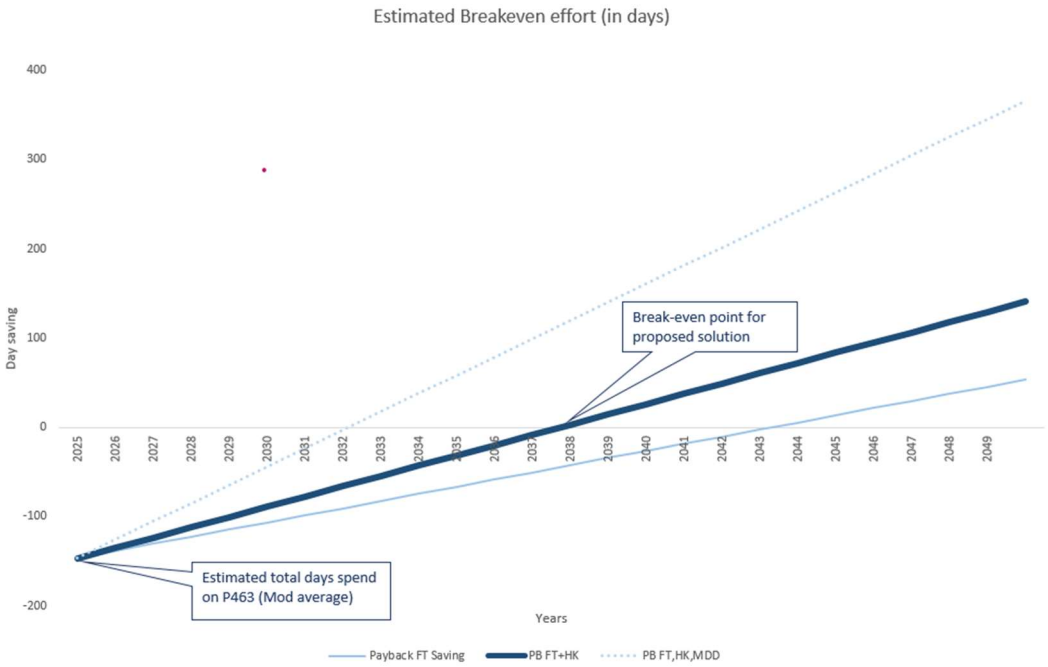
Estimated costs of P463

For those roles the Workgroup believe will be impacted, the Workgroup have indicated whether it believes the costs are likely to be high, medium or low based on the following categories. We invite you to validate and refine these estimates via this consultation:

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



The costs and impacts to implement and operate the Standard Change framework will be low for Elexon. The estimated costs and benefits for P463 are:

- Elexon calculates that P463, as an average Modification, should take ~146.5 days of Elexon and industry effort to progress and implement.
- By implementing a Standard Change framework in isolation, no benefit is seen. 146.5 days effort represents a sunk cost.
- By including Fuel Type Changes in P463, we begin to see gains within ~20yrs. This assumes 1 Fuel Type change per year.
- Including Fuel Type Changes and CSD housekeeping (assumes one change per year each) in P463, gains are seen after ~12yrs. **This is the proposed solution** and is seen on the graph above as a bold line.
- If P463 only included the Standard Change framework and Fuel Type Changes and CSD housekeeping were included in the Standard Change process subsequently, then the payback time would be approximately 16 years.
- The Workgroup also discussed including MDD changes. **This is not the proposed solution** but might give some insight into how gains may accumulate in the future. We estimate that gains would be seen within ~6yrs if MDD (assumes 12 MDD changes a year) were included in P463.

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A breakdown of the summary above can be found in Appendix 3. Below, we provide the cost estimates.

Implementation costs estimates			
Organisation	Item	Implementation costs (£)	Comment
Elexon	Systems	0	
	Documents	1k-2k	Costs to implement changes to the BSC and subsidiary documents
	Other	1k-3k	Costs to implement and update internal processes and external guidance / website
NGESO	Systems	0	
	Other	0	
Industry	Systems & processes	0	
	Total	2k to 5k	

On-going cost-saving estimates		
Organisation	On-going costs (£)	Comment
Elexon	2.5k to 3.5k savings per Fuel Type change	Standard Change Process absorbed into Elexon BAU. For Fuel types, we expect to save ~5 days effort per change. Expected number of Fuel Type changes per year - 1
	1K to 1.5K savings per Subsidiary Document housekeeping change	For housekeeping, we expect to save ~3 days effort per change. Expected number of Subsidiary Document housekeeping changes per year is 1
NGESO	0	No impact expected
Industry	0	No impact expected
Total	~3.5k to 5k savings per year	

P463 impacts

We do not expect that introducing a Standard Change framework will impact market participants. However, any enabling changes that are needed to make a change follow the Standard Change process could impact market participants.

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Impact on BSC Parties and Party Agents		
Party/Party Agent	Impact	Estimated cost
Parties and Party Agents	No impact from introducing the Standard Change framework itself. Impacts arising from the enabling changes to include Fuel Type changes and Subsidiary Document housekeeping as Standard Changes are expected to be low to none, as the activities will remain the same (e.g. read change notices, asses change and implement change).	L

Impact on the NETSO	
Impact	Estimated cost
No impact anticipated as any impacts from including Fuel Type changes as a Standard Change will not impact the activities that NETSO need to do, other than they will no longer need to raise a CP or respond to a CP consultation.	N/A

Impact on BSCCo		
Area of Elexon	Impact	Estimated cost
Rules Management	Implement the changes to the BSC documents and processes	L
Settlements & Insights	No impact from introducing the Standard Change framework itself. Update internal processes for Fuel Type changes and housekeeping to align to Standard Change process (instead of CP process)	L

Impact on BSC Settlement Risks
There is no perceived impact on the Settlement Risks, as we are not amending rules that impact Settlement. Enabling changes for Fuel Type changes and housekeeping present no perceived risk to Settlement.

Impact on BSC Systems and process	
BSC System/Process	Impact
Rules Management and Settlement & Insights	No impact on BSC systems. Positive impact on efficiency

Impact on BSC Agent/service provider contractual arrangements	
BSC Agent/service provider contract	Impact
N/A	N/A

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Impact on Code	
Code Section	Impact
Section F	Amendment to include BSC Standard Change procedure
Section Q	Enabling change to allow Fuel Type changes to follow the Standard Change process
Section X Annex-1	Update to BSC Defined Terms

Impact on Market Wide Half Hourly Settlement (MHHS)
The Workgroup does not expect any impact on the MHHS programme. This Modification is not expected to impact the design of the MHHS Target Operating Model or impact the MHHS Code drafting.

Impact on EBGL Article 18 terms and conditions
The Workgroup does not anticipate any impacts on the EBGL or Network Code for Emergency and Restoration (NCER) terms and conditions.

Impact on Code Subsidiary Documents	
CSD	Impact
BSCP40	Include two new processes and associated defined terms: 1. Standard Change identification and approval 2. Standard Change process Also updated to enable housekeeping changes to CSDs to follow the Standard Change process, instead of the housekeeping CP process.

Impact on other Configurable Items	
Configurable Item	Impact
NETA IDD	No direct impact, but by moving the Fuel Type changes to the Standard Change process, consequential IDD changes would no longer require a CP. Instead the IDD changes would be notified to industry in line with the Minimum Notice Period.

Impact on Core Industry Documents and other documents	
Document	Impact
Ancillary Services Agreements	None identified
Connection and Use of System Code	
Data Transfer Services Agreement	
Distribution Code	
Grid Code	

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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 on Core Industry Documents and other documents	
Document	Impact
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
Ofgem confirmed that P463 should be treated as SCR-exempt on 3 November 2023.

Impact of the Modification on the environment and consumer benefit areas:	
Consumer benefit area	Identified impact
1) Improved safety and reliability	Neutral
2) Lower bills than would otherwise be the case	Neutral
3) Reduced environmental damage	Neutral
4) Improved quality of service	Neutral
5) Benefits for society as a whole	Neutral

The Workgroup did not identify any impacts on consumers or the environment.

Assessment Consultation Question
Do you agree with the Workgroup's assessment of the consumer benefits?
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?
Do you agree with the Workgroup's assessment of the impact on the BSC Settlement Risks?
Will P463 impact your organisation?
How much will it cost your organisation to implement P463?
What will the ongoing cost of P463 be to your organisation?
How long (from the point of approval) would you need to implement P463?
The Workgroup invites you to give your views using the response form in Attachment D

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Proposed Standard Change Process and Potential Candidates for Standard Change

The Workgroup deliberated on the Proposed P463 Modification, gaining a comprehensive understanding of the strawman standard change process (included in the Proposal Form) and the rationale behind potential change types for inclusion. The discussion emphasised that this was not an attempt to dilute governance but to streamline the Change process and make certain changes more proportionate in effort. The focus of the discussion was on Fuel Type changes and housekeeping which, the Workgroup agreed, meet the proposed Standard Change criteria in principle (more detail below). The Workgroup also explored potential complications and benefits of the proposed SC model using MDD, which is discussed in further detail in a separate section below. The Workgroup agreed that each change type approved to follow the Standard Change process should be subject to a minimum notice period to ensure impacted participants have a sufficient period of time to implement the change. The Workgroup agree that the Panel should consult on this before setting this period, which could be longer if deemed appropriate by BSCCo.

The Workgroup also discussed adherence to existing licensing processes. Elexon legal confirmed that the current proposal was in line with the BSC Modification procedures in the Transmission Licence Condition C3.

Standard Change criteria

The Workgroup reviewed the draft Standard Change criteria, which change candidates would have to meet in order to be classified as suitable for following the Standard change process.

A consensus was reached on the criteria to be issued for consultation. As part of this discussion, the Standard Change criteria was revised to make them more specific and reflective of the risk to Settlement. Originally the low risk criteria made no reference to Settlement. This criterion was also not clear whose IT environment or business processes the risk related to, so this was clarified to be both Elexon's and participants. These clarifications can be seen in the redlining below:

> *Low risk - A change is considered low risk when it has a minimal or negligible chance of causing adverse effects to Settlement and the IT environment or the business processes it supports for both BSC central systems and participants.*

Some duplication was also removed from the low risk criteria as this was already captured in the repeatable criterion.

The group also debated whether to keep the following in the low risk criterion: "*The consequence of failure, if it occurs, is minimal."* There was concern this may be overly restrictive, making it difficult to meet. However, the group decided to keep it, as the Panel would be able to take a pragmatic view when making decisions and 'the bar' could always be amended at a later date. There was a general view it would be better to be more restrictive to start with to ensure the success of Standard Changes.

The Workgroup also agreed that the criteria should be captured in the BSC, rather than only in BSCP40, so that a Modification would be required to amend the criteria. They believed this was appropriate as the criteria were the critical component of deciding what was eligible for following the Standard Change process and what was not.

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The Workgroup propose that the Panel should decide whether a change meets the Standard Change criteria.

Cost/Benefit Analysis

The Workgroup requested Elexon provide a cost/benefit analysis. A cost/benefit analysis was conducted, considering Fuel Types, housekeeping, and MDD.

The costs and benefits focussed on the effort (time) required by Elexon and market participants to implement P463 and any subsequent Standard Changes. The Workgroup highlighted that the efforts invested in P463 so far represent a sunk cost. However, implementing the Modification serves as an enabler, allowing specific changes to advance more rapidly while still operating within the framework of BSC governance and industry control. The Workgroup recognised that the benefits of these changes may take years to fully realise, but overall, this approach is more efficient, especially when incorporating enabling changes.

Benefits

The implementation of the Standard Change framework itself will not bring any benefits. Benefits will only be realised where changes are categorised as a Standard Change and subsequently follow the Standard Change process. The primary benefit is the reduced assessment time for relevant changes (implementation activities will remain the same).

The Workgroup considered the relative benefits of different scenarios:

1. Implementing a Standard Change Framework in isolation
2. Implementing the framework with Fuel Type Changes
3. Implementing the framework with Fuel Type Changes and CSD housekeeping
4. Implementing the framework with Fuel Type Changes, CSD housekeeping and MDD

Elexon believed the Standard Change framework had stand-alone value and was perceived to have potential to improve efficacy, on the basis that over time more change types would get added and it would get used more and more. There were mixed Workgroup views on this. The Workgroup expressed that implementing P463 sooner rather than later would be beneficial and agreed that including suitable enabling changes would represent best value. The Workgroup agreed that Fuel Type Changes and CSD housekeeping met the SC criteria and should therefore be included in this Modification.

The Workgroup also considered the potential benefit of including MDD, which was estimated to add a saving of 9WDs per year. It was felt that the risks associated with including MDD at this stage outweighs that benefit. Therefore, P463 – including housekeeping of Subsidiary Documents and Fuel Type Changes – would achieve a saving of 11.5WDs per year.

The Workgroup noted that the Standard Change Process would require a frontloaded volume of work and that the cost/benefit analysis given was based on some assumptions and uncertainties. The benefits would depend on the number and type of changes that could follow the Standard Change process. There could be some qualitative benefits and value from implementing P463, such as faster delivery of changes, reduced complexity, and more flexibility. It was agreed that the cost estimates shown were likely to be

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somewhat conservative. The Workgroup considered implementing P463 to act as an enabler to allow certain Changes to progress more quickly, while remaining under BSC governance and, therefore, under industry control.

Assessment Consultation Questions
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?
Do you agree with the proposed minimum notice periods for Fuel Type changes and subsidiary document housekeeping changes?
Do you agree with the owning Committee for Fuel Type changes and subsidiary document housekeeping changes?
Are there any further changes that you believe could be considered as Standard Changes for inclusion in this Modification?
The Workgroup invites you to give your views using the response form in Attachment D

Rejection and Appeals

The Workgroup discussed the need for an appeal mechanism for Standard Changes to allow parties who disagree with a Standard Change, or want more robust governance, to challenge the decision. One option discussed was to appeal via Ofgem. The Workgroup also considered a two-tiered appeal process, with the appeal going to Panel and then to Ofgem. These options were considered burdensome and disproportionate as Standard Change pertains to routine, low-risk changes, with safeguards built in via the SC criteria.

The Workgroup debated whether to permit an optional route for BSCCo to consult. The consensus was against proposing steps for optional consultation as this was seen to move the Standard Change process too close to existing change processes.

Some Workgroup members felt that an appeal process made the Standard Change process too similar to the current CP process. However, it was argued that an appeal process was necessary in order to future-proof the process against developments within the industry. Moreover, it was believed to be an appropriate check and balance.

Should interested persons have the right to appeal the Panel's decision to categorise a change type a Standard Change?

Elexon was of the view that an appeal right here (process 3.16 in BSCP40 redlining) was not necessary. Parties would be able to provide views on whether specific change types are suitable to be treated as Standard Changes via the required consultation in BSCP40 3.16 process. The Panel will decide whether to add a change type to the Standard Change log, taking the consultation responses into account. Elexon therefore believed that as the Panel would take the consultation views into account, when making a decision that an appeal route was not in line with the streamlined change process idea and was not proportionate to the risk. However, the Workgroup believed this was appropriate as they believed it was better to have these mechanisms and not use them than not have them at all.

Should interested persons have the right to appeal BSCCo's decision to progress a Standard Change?

Elexon believed it there was justification for including an appeal mechanism in the drafted BSCP40 3.17 process, as it would address the risk that you could get a Standard Change

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that was exceptional. It would also act as a check and balance against BSCCO decisions and therefore the added complexity could be justified. Two main options were considered:

1. Include an appeal mechanism to the Panel for anyone to raise within [5WDs] of a BSCCo decision

2. On appeal, require BSCCo to put a Standard Change out for consultation and to seek relevant Panel Committee(s) comment

The Workgroup adopted option 1, as they believed option 2 would be overly burdensome and not proportionate. Some believed it moved the Standard Change process too close to the CP process, undermining the purpose of a SC framework. It was for this reason that the Workgroup also rejected the idea of allowing BSCCo to consult and seek Committee views, where it believed it was necessary. It was noted that this could be done anyway, it just wouldn't be part of the formal process.

Appeal conclusions

In response to Workgroup discussions, an appeal route has been drafted in the BSCP40 redlining – 3.16 and 3.17.

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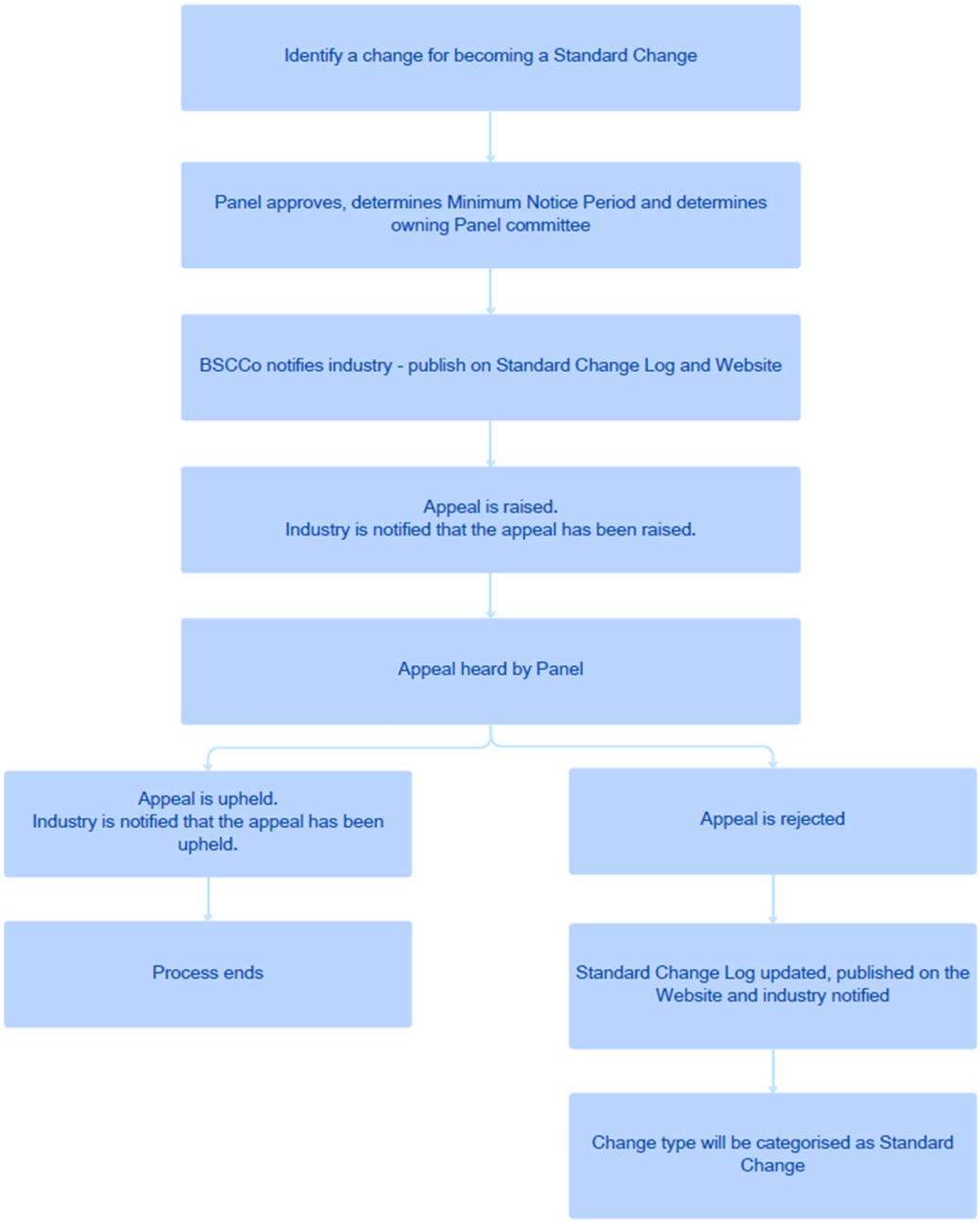
If appealing a change being classified as a Standard Change:



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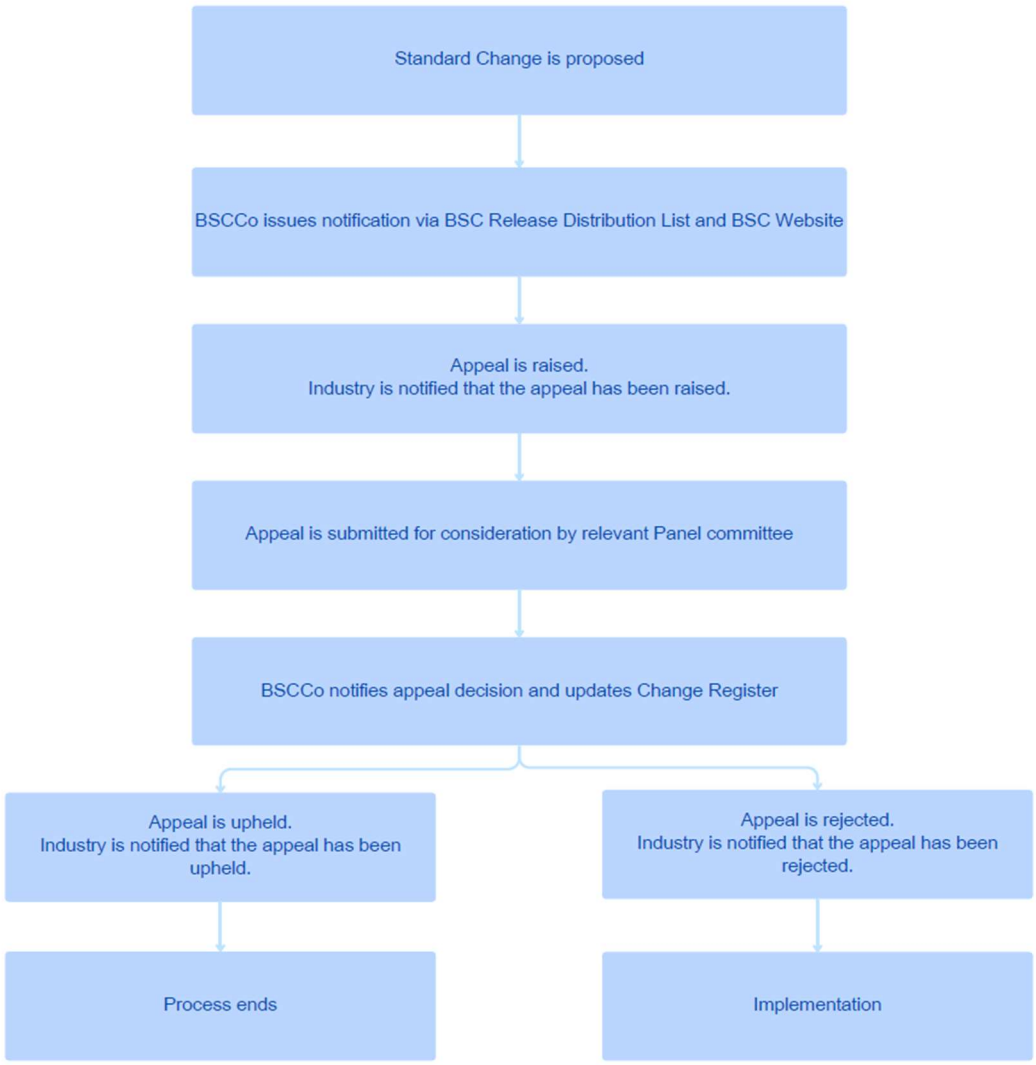
To appeal during the Standard Change process:



The Workgroup questioned whether the appeal process is recreating the Change Proposal process and whether it is beneficial to introduce this above and beyond the existing baseline of the CP process.

The Workgroup raised concerns that an appeal process could become burdensome if multiple appeals are submitted, following an initial decision e.g. by the same party for the same reasons. The Workgroup deliberated on the wording of the appeal constraints, aiming to prevent more than one appeal for the same reason unless there are demonstrated changes in circumstances. In the end the Workgroup believed it was more flexible and in line with existing practices (e.g. used in Change Proposal and Trading Disputes processes) for BSCCo to be able to reject appeals that it believed were 'frivolous or vexatious', with the Panel having the right to overturn BSCCo's decision.

Assessment Consultation Question	
Do you agree with the Workgroup that an appeal mechanism is needed in both process 3.16 and 3.17 as drafted in BSCP40?	**Yes/No**
If 'Yes', please provide your comments.	
Insert comments here	

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Removing items from the Standard Change Log

It was suggested that a process is needed to remove items from the Standard Change Log and to amend the minimum notice periods. Two options were identified for removing items from the Standard Change Log:

1. Adopt the same approach as change candidates go through to become a Standard Change i.e. a request to revert the change type back to a CP or Modification would be made. This would be consulted on and taken to Panel for decision; or
2. A simplified process where a proposal to remove an item would go straight to a Panel decision.

The Workgroup adopted option 1, but did not include a right of appeal. This was on the basis that moving a change from the Standard Change process back to a more robust governance process was inherently less risky and therefore did not require the right of appeal.

Amending Minimum Notice Periods

Two options were discussed for amending minimum notice periods:

1. A recommendation to the Panel that requires a consultation and Panel approval.
2. A recommendation to the Panel where the Panel decides whether to approve or reject.

The group agreed on option 1, as the minimum notice periods could impact participants' implementation activities and so they should be consulted so that the Panel can take their views and impacts into consideration when deciding whether to amend a minimum notice period.

Which changes could follow the Standard Change process and, of those, which should be included in the Modification Proposal?

The Workgroup discussed whether any enabling changes should be included. There was initially some concern that the inclusion could 'muddy the water' and the merits of a Standard Change framework should be judged on its own. However, having reviewed the cost/benefit analysis presented by Elexon that demonstrated it was more efficient to include enabling changes in P463 (by including Fuel Types at least 27 days of effort are saved, compared to classifying Fuel Types following P463 implementation) and that it would be difficult to get P463 approved without enabling changes (as the cost/benefit would be theoretical), the Workgroup agreed to include at least two that they believed met the proposed Standard Change criteria. The Workgroup considered Fuel Type changes, housekeeping and MDD changes.

Fuel Type changes

The Workgroup discussed strawman redlining in Section Q to make Fuel Type changes a Standard Change, this was met with broad approval and the Workgroup agreed that there were potential benefits of streamlining Fuel Type changes via inclusion in P463 and, therefore, propose that making Fuel Type changes a Standard Change should be included in this Modification. The assessment against the proposed Standard Change criteria given by Elexon, which the Workgroup agreed with were:

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Adding, amending or removing Fuel Types on BMRS impact on the proposed Standard Change criteria		
Low Risk	Repeatable	Predictable
1. Changes to fuel types has no impact on Settlement 2. New system does not require complex code changes to ingestion logic 3. Reporting has no major changes to schema and minimal impact to customers consuming the data	1. Frequent change has resulted in well documented processes for system changes and testing 2. Changes to include a new fuel type on the data set with no major changes to schema 3. Future changes will not require code changes	1. Registration process highlights naming convention ahead of time 2. All system impact and reporting changes are known ahead of time 3. Previous changes have not come across unaccounted requirements during implementation

Housekeeping

Housekeeping was raised as a potential candidate to follow the Standard Change process. Elexon provided legal analysis that concluded housekeeping changes to the BSC itself would require an amendment to the Transmission Licence (as the BSC housekeeping process is detailed in the Licence) and so was outside the scope of P463. However, no such constraint exists for housekeeping changes to the BSC subsidiary documents.

Arguments were made that inclusion of housekeeping would have limited value. However, some argued that the effort and cost of effecting the change has already been spent in the drafting work as part of P463, that housekeeping of subsidiary documents meets the criteria and that it may aid industry in prioritising consultation responses. The Workgroup were therefore in favour of including housekeeping for subsidiary documents in the P463 solution. The assessment against the proposed Standard Change criteria given by Elexon, which the Workgroup agreed with were:

Housekeeping changes to CSDs impact on the proposed Standard Change criteria		
Low Risk	Repeatable	Predictable
• Housekeeping changes should not amend the intent of the rules in anyway. They therefore should pose no risk to Settlement, systems or processes and are therefore low risk.	• The process to amend the CSDs follows a well-defined document management process that has been done thousands of times	• The outcome is highly predictable, as the tracked changes clearly show the changes to be made

Market Domain Data

The Workgroup also discussed the suitability and challenges around including MDD as a candidate for Standard Change. Elexon believe that MDD meets the Standard Change Criteria as:

- Low risk:

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- Data submissions must meet set parameters set out in BSCP509 (Entity Forms) and cannot deviate away from the form structure.
- Only BSC Parties can submit requests to include or amend data.
- The process of updating the MDD, issuing it to industry for review and implementing it, only poses a risk to Settlement where erroneous data is implemented (e.g. because of manual error or an error in the calculation of the data up stream) and not corrected before a Settlement Run. Errors are very likely, as evidenced in the Elexon analysis (see below), to get picked up in Elexon testing or by industry review before they are implemented and data can quickly be re-published where not

- Repeatable:
  - MDD is version controlled and follows the same process each time.
  - This has resulted in a well-documented activity, made easier by the set requirements detailed within BSCP509 which need to be met in order to be entered into the central repository

- Predictable:
  - MDD follows a strict timetable which is published each November/December to Industry.
  - All data submitted for MDD is based on set structures with determined inputs and outputs

The Workgroup held mixed views as to whether MDD met these criteria, but overall did not believe MDD changes were always low risk. Some abstained on the basis they were not knowledgeable about MDD.

The Workgroup discussed the possibility of separating some MDD changes (those that do not impact Settlement) as suitable for SC while allowing others to continue to go through the existing process (those that could impact Settlement). The group agreed that there are some changes (MDD and in general) that do not warrant the two or three month consultation process, but expressed caution about which changes are streamlined. A member also highlighted that a control that has not been used, should not necessarily be removed and that an abundance of caution is sometimes necessary. Overall, the Workgroup did not want to separate MDD data into low risk and higher risk data sets, as this would add complexity. Instead they took a view on MDD as a whole.

Elexon provided a risk analysis of MDD, which showed all MDD errors over a three year time period (see Appendix 2 for details). All errors were resolved before Settlement was impacted and only one was flagged by SVG. Elexon suggested that SVG could be removed from the MDD process without significant risk, according to the data. A Workgroup member disagreed with the conclusion offered by Elexon and suggested that SVG had only been used once to make a correction, which is testament to the existing checks and balances, rather than proof that the checks and balances are no longer necessary.

Another Workgroup member also raised concerns about MDD as a candidate for Standard Change and gave an example where a Party had accessed SVG papers to explore a specific Change and found a mistake. It was argued that this proves the value in being able to access those papers. The WG member asked what mechanism would be in place to ensure that this detail is not lost. Elexon suggested that the SC forms would be

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published with the MDD entity forms, so in this example industry would still have been notified and had access to the relevant paperwork to review and conduct impact assessment i.e. the error would have been able to be found under the SC process.

The Workgroup also discussed whether MDD changes were predictable and repeatable. Two views were put forward:

1. Any individual MDD entity can be changed by a repeatable and predictable process (detailed in BSCP509); or

2. MDD as a whole can change in a myriad of ways, then it's not repeatable and predictable because it depends on what changes have been raised.

MDD MHHS impacts

Further discussion centred on the potential impact on MHHS design, should MDD be included within P463. Currently, any Modifications that impact the MHHS design must raise a MHHS Programme Change Request and this must be approved in order for the Modification to be implemented. The Change Request may also constrain and influence the Modification Implementation Date. Similar considerations are needed for impacts on the MHHS code drafting. The Programme has put in place a code freeze, where only Modifications that are needed to deliver MHHS are likely to be have a Change Request approved.

Under MHHS, MDD becomes superseded by the Industry Standing Data (ISD). To gain insights, the Workgroup engaged the MHHS programme, who opined that introducing P463 is a prudent approach. Importantly, they confirmed that P463 would not impact the MHHS design, so no Programme Change Request would be required i.e. it would fall outside the scope of the MHH code freeze. This was on the basis that the design does not touch the business processes. There would be no changes to participants systems.

From a code drafting perspective, the need for a program CR was also deemed unnecessary, as BSCP509 would be superseded by BSCP707[8] 'Changes to Industry Standing Data'. The impact on BSCP707 was seen as consequential.

Elexon and MHHS colleagues suggested that the inclusion of MDD/ISD could reduce the risk to MHHS Migration that capacity is unused between PAB approval for Qualification and Migration activity.

The submission and processing of ISD via the Customer Solution have been configured around SVG approval. While minor build adjustments (with potential Helix impact, including a CR) would be necessary, the Workgroup emphasised the critical timing of process changes in the context of MHHS code drafting.

As a further rationale for P463, Elexon highlighted the advantage of introducing it sooner rather than later. Anticipating an upsurge in change volume upon the Market-wide Half-Hourly launch, a Workgroup member stated that, should MDD become a Standard Change, now is the appropriate moment to consider it.

A Member also highlighted that ISD changes would not likely meet the predictable and repeatable criteria as it would be a new process.

[8] https://www.mhhsprogramme.co.uk/code/code-artefacts

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Therefore, the Workgroup proposed that MDD should not currently advance as a Standard Change through this Modification due to the ISD process not being repeatable and predictable (yet) and the risks to Settlement.

De Minimis BMRS CP

The Workgroup discussed the impact of P463 on the De Minimis BMRS CP process in BSCP40. This process was introduced by P372[9] 'Speeding up the approval process for the publication of BSC data on the BMRS' with the aim of speeding up BMRS changes that met certain criteria focussed on cost. The Workgroup considered whether P463 would supersede the De Minimis process or whether the De Minimis and the Standard Change process were complementary.

Elexon explained that the De Minimis process had not been used since it was implemented in June 2019, because changes to the legacy BMRS system were always above the cost threshold. With the retirement of the legacy BMRS system and the introduction of the new Insights platform, this could change soon. For example, Fuel Type changes on Insights would likely meet the cost threshold, but would still require Panel approval (in accordance with Section Q).

The arguments for removing the De Minimis process were that the Standard Change process would be more flexible. Arguments to keep it were that it would be the 'least change' approach and allows both the Standard Change and the De Minimis processes to be tested, following which a change could be raised to remove the De Minimis process, if deemed appropriate. It was also suggested that you could use the De Minimis process to progress Fuel Type changes if a Modification was raised to amend Section Q requirement for Panel approval. This could be a sensible option if the Workgroup did not believe Fuel Types met the Standard Change criteria or that P463 should not be approved.

Overall, the Workgroup agreed to keep the De Minimis process as:

- It would allow both the Standard Change and the De Minimis processes to be tested over the coming years (now that legacy BMRS systems are being turned off, which should increase the likelihood of BMRS changes meeting the De Minimis cost thresholds).
- The Workgroup were supportive of Fuel Type changes being included in the P463 solution as they believe they meet the Standard Change criteria.

Energy Code Reform

Ofgem published its "Consultation on the implementation of energy code reform[10]" which closed on 23 April 2024. The intent of this reform, among other things, is to move code administrators to licenced code managers and to consolidate some codes. The BSC will not be consolidated and is expected to be in the first phase of codes to be managed by a code manager, expected around the end of 2025 / early 2026. The new code manager

[9] https://www.elexon.co.uk/mod-proposal/p372-speeding-approval-process-publication-bsc-data-bmrs/
[10] https://www.ofgem.gov.uk/publications/energy-code-reform-implementation-consultation#:~:text=Under%20this%20new%20code%20governance,changes%20in%20the%20energy%20market.

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modification process will be designed by Ofgem this year, with input from a workgroup formed by Ofgem this summer. The Workgroup considered what bearing this had for P463:

- Option 1: None – we can only assess against the current baseline and the reform is still two years away for the BSC and longer for other codes
- Option 2: Some – if P463 can be implemented swiftly, lessons can be learnt and fed into the code reform work
- Option 3: Significant – P463 should be withdrawn to avoid nugatory work and focus on higher priority work

The Workgroup decided that it had little bearing at this time and that P463 should continue to be progressed and could still deliver value either from its desired outcomes or from lessons learnt from the P463 process.

Other potential Standard Change candidates

Elexon presented other potential Standard Change candidates both as a way to test the Standard Change criteria, but also to identify other candidates to include in P463. The Workgroup decided not to include these at this time as they believed Fuel Type changes and housekeeping changes for CSDs were the best fit for the Standard Change criteria.

Change Candidate	Elexon Assessment
De Minimis acceptance Threshold (DMAT)	unsuitable against proposed Standard Change criteria
Continuous Acceptance Duration Limit (CADL)	unsuitable against proposed Standard Change criteria
Value of Lost Load (VoLL)	unsuitable against proposed Standard Change criteria
Loss of Load Probability (LoLP)	unsuitable against proposed Standard Change criteria
Supporting a, or additional, valid value within REMIT XSD on BMRS	potential to meet Standard Change criteria
Standardising or improving consistency of content within reports with no change to schema on BMRS	potential to meet Standard Change criteria
NG ESO/FSO changes, such as Demand Flexibility Service, that requires Elexon to make changes/incorporate new data items on BMRS	potential to meet Standard Change criteria
Change to Line Loss Factors (LLFs)	potential to meet Standard Change criteria
Network Mapping Statement (for Seasonal Transmission Losses)	potential to meet Standard Change criteria
Credit Assessment Load Factor (CALF) Appeals	MHHS impact
Profiling	MHHS impact

The Workgroup did not identify any other change candidates, but welcome consultation views on other potential candidates that could have a bearing on the merits of P463.

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7 Workgroup's Initial Conclusions

The **majority** of Workgroup Members believe that P463 would better facilitate Applicable BSC Objective (d), and so **should be approved**. The minority of Workgroup Members believe P463 is negative or neutral (not better than the current baseline) against BSC Objective (d).

No impacts on any other Applicable BSC Objectives were identified. A Member theorised that P463 could be argued to better facilitate Objective (c), as it would reduce the need for industry to respond to consultations. Furthermore, this could help smaller organisations focus on more material changes. However, overall, they did not believe these were material enough justify a benefit against Objective (c).

The Workgroup also considered whether to provide views solely on the Standard Change framework or also on the enabling changes. As the current Workgroup proposal is to include Fuel Types and housekeeping for CSDs as a Standard Change in P463, the views provided take this into account.

It should also be noted that the Proposer's Representative was an Elexon employee. This means that they do not have the typical Proposer powers and ownership rights i.e. they cannot vote or make decisions about the solution. Instead, the solution is owned by the Workgroup and decisions are made by simple majority.

Applicable BSC Objective (d)

The Proposer and a majority of the Workgroup believe that, by introducing a Standard Change process, P463 will allow certain changes to be progressed more efficiently, reducing the burden for industry and Elexon.

Those who believe that P463 is positive against BSC Objective (d) commented on the potential benefits that a Standard Change process could have to streamline Subsidiary Document housekeeping changes and Fuel Type changes. It was argued that P463 has the potential to streamline and increase efficiency in the Change process, but that this was dependent on the changes deemed suitable for categorisation as Standard Change in the future. There was a degree of a leap of faith that the process would yield more and more benefit as further changes were added and more Standard Changes were raised.

Those who believed that P463 is negative against BSC Objective (d) believed P463 would not promote efficiency because it would instead add complexity to the arrangements. Three arguments were made. Firstly, that 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. Secondly, the need for enabling changes to classify a Standard Change renders the SC process somewhat redundant. Lastly, 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. Elexon notes that these enabling changes would be one-time occurrences and that the costs for this proposal has already been realised. However, the long-term value would depend on the specific types of changes deemed suitable in the future.

Those who believe that P463 is neutral against BSC Objective (d) stated that the Standard Change framework itself does not realise any benefits or efficiencies. The addition of Fuel Types and housekeeping offers marginal benefits, but that P463 replaces one element with another and that the scope of benefits is not clear or proven.

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 administrating 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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Self-Governance

The Proposer and Workgroup agree that P463 should not be considered suitable for Self Governance decision as it proposes a material amendment to the Code's governance procedures. Therefore the Workgroup initially recommend that P463 is sent to Ofgem for decision.

EBGL Article 18 Terms and Conditions

The Proposer and Workgroup agree that P463 will not impact the European Balancing Guideline (EBGL) Article 18 Terms and Conditions, as listed in BSC Section F, Annex F-2 under the current proposed solution. The Workgroup believe that P463 does not impact on the EBGL provisions held within the BSC, nor does it extend them. It therefore has no impact on the EBGL objectives.

What are the Applicable BSC Objectives?

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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Appendix 1: Workgroup Details

Workgroup's Terms of Reference

Specific areas set by the BSC Panel in the P463 Terms of Reference	Conclusion
a) What criteria should be met in order for a change to be established as a Standard Change?	The Workgroup agreed the Standard Change criteria as follows: **Low risk**: A change is considered low risk when it has a minimal or negligible chance of causing adverse effects to Settlement and the IT environment or the business processes it supports for both BSC central systems and participants. The consequence of failure, if it occurs, is minimal. **Repeatable**: This relates to the ability to implement the change consistently over and over again without variations in the process or outcome. For a change to be considered standard, it must be repeatable. This means that the same steps are followed each time. **Predictable**: This pertains to the expected outcomes of implementing the change. A predictable change is one where the outcome is known based on previous implementations or thorough testing. There shouldn't be any surprises when the change is made.
b) Is there a need for an objection or appeal mechanism within the Standard Change framework? If so, how should it be implemented?	The Workgroup agreed on an appeal process which has been redlined in BSCP40 and can be seen in Attachment B
c) Which changes could follow the Standard Change process and, of those, which should be included in the Modification Proposal?	The Workgroup propose the following potential changes should be included in P463 and classified as a Standard Change: • Adding, amending or removing Fuel Types on BMRS • Housekeeping changes to CSDs (not the BSC)

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Assessment Procedure timetable

P463 Assessment Timetable	
Event	Date
Panel submits P463 to Assessment Procedure	9 November 2023
Workgroup Meeting 1	19 December 2023
Workgroup Meeting 2	6 March 2024
Workgroup Meeting 3	10 April 2024
Assessment Procedure Consultation	22 April 2024 – 13 May 2024
Workgroup Meeting 4	w/c 20 May 2024
Panel considers Workgroup's Assessment Report	13 June 2024

Workgroup Membership and attendance

There were three Workgroups for P463. On 11th April, an ad-hoc meeting took place to complete voting.

P463 Workgroup Attendance					
Name	Organisation	19 Dec 2023	6 Mar 2024	10 Apr 2024	11 Apr 2024
Members					
Lawrence Jones	Elexon *(Chair)*	✓	✓	✓	✓
Serena Tilbury	Elexon *(Lead Analyst)*	✓	✓	✓	✓
Clare Hannah	IM Serv	✓	✓	✓	✓
Nik Wills	Stark	✓	✓	✓	✓
Mark Jones	SSE plc	✓	✓	✓	✓
Philip Eyre	Npower	✓	✓	✓	✗
Emily Waters	BUUK	✗	✓	✓	✓
James Evans	Evans Energy Consulting	✓	✓	✓	✓
Graz Macdonald	Waters Wye Associates	✓	✓	✓	✓
Attendees					
Lorna Lewin	Elexon (Market Design)	✓	✓	✓	✓
Mark DeSouza Wilson	Elexon (Market Design)	✓	✓	✗	✗
Tina Wirth	Elexon (Lead Lawyer)	✓	✓	✓	✗
Zaahir Ghanty	Elexon (Subject Matter Expert)	✓	✓	✓	✓
James Townsend	Elexon (Subject Matter Expert)	✓	✓	✗	✗
Freya Gardner	Elexon (Subject Matter Expert)	✗	✗	✓	✓
Andrew Margan	MHHS (Subject Matter Expert)	✗	✗	✓	✗
Jonathan Coe	Ofgem	✓	✓	✓	✗

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Appendix 2: MDD Analysis

MDD Version	What was the error?	How was the error identified?	Was Settlement impacted?	
V313	A Change Request (CR) was withdrawn as some LLFC/SSC/PC combinations were being raised in areas where there was no corresponding Average Fraction of Yearly Consumption (AFYC) data.	Market Participant Impact Assessment	No	Pre Publish
V317	A CR creating combinations for use with Token meters but no other legacy Prepayment type was withdrawn, as it was highlighted the infrastructure would include legacy key meters.	Market Participant Impact Assessment	No	
V323	An incorrect Effective From Date was identified and corrected from 11/05/2022 to 18/05/2022.	Market Participant Impact Assessment	No	
V325	A Change Request creating new SSCs was withdrawn, as it was identified the data was incomplete and could be simplified.	Market Participant Impact Assessment	No	
V330	A CR end-dating a Supplier MPID was withdrawn, as SVG advised the MPID still had assigned MPANs.	SVG	No	
V345	AFYC records were end-dated or deleted in error. MDD was corrected and re-published before the go-live date.	Market Participant	No	Post Publish
V340	A CR was omitted from MDD in error. As there was no material impact, the CR was included in the next available MDD Version.	Market Participant	No	
V333 - 336	Erroneous end-dates were added to two AFYC records and the solutions in MDD V334 and V345 caused further issues. This required some Participants to make manual amendments to the D0269 or D0270 files.	Market Participant	No	
V320	There was an error in a Clock Time Change where one date had '2222' instead of '2022'. Until it was rectified in MDD V321, some Market Participants had to make a manual amendment to the D0269 or D0270 files.	Market Participant	No	
V319	A new Distributor Short Code of '77' was created and assigned to MPID 'AMSN' under Role Code R (Distributor). An associated Role Code P (PRS Agent) is required under the validation rules in MDD but this was not added for 'AMSN'. This was corrected in MDD V320.	Market Participant	No	

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Appendix 3: P463 costs and benefit breakdown

P463 Assessment and Implementation Effort Estimates		
Activity	Elexon Effort (days)	Industry Effort (days)
Assessment Phase	80	53
Report Phase	6	2.5
Implementation Phase	5	0
Total	91	55.55
Overall Total: 146.5		

Ongoing Effort Estimates		
Activity for establishing a standard change (process 3.16 as drafted in BSCP40 in Attachment C)	Elexon Effort (days)	Industry Effort (days)
Establishing a Standard Change	3	11
Enabling changes	8 to 91	5 to 55.5
Total	11 to 94	16 to 66.5
Overall Total: 27 to 160.5		

Benefit (days)				
Change Candidate/Type	Elexon Assessment Effort Reduction (days)	Industry Assessment Effort Reduction (days)	Assumed number of changes per year	Total (days)
Fuel Types	7	1	1	8
CSD Housekeeping (HK)	3	0.5	1	3.5
MDD	0.5	0.25	12	9

Net position				
Scenario	**Cost / year (days)**	**Benefit / year (days)**	**Net**	**Breakeven**
1. Implement only Standard Change framework in P463	146.5	0	146.5	Not achieved
2. Implement Standard Change framework in P463 + Fuel Types	146.5	8	138.5	20 years (146.5/8)
3. Implement only Standard Change framework in P463 + Fuel Types +HK	146.5	11.5	135	12 years
4. Implement only Standard Change framework in P463 and then Fuel types + HK subsequently	146.5 + (2*27) = 200.5	11.5	189	16 years

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5. Implement only Standard Change framework in P463 + Fuel Types +HK + MDD	146.5	20.5	126	6 years

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