

P463 'Introduce a Standard Change' Workgroup Meeting 2 Summary

Summary

1. Meeting Objectives

- 1.0 The Chair welcomed attendees and presented the meeting objectives:
- 1.1 Further scoping of the impacts of P463 and its value as a new Change Type, via discussion of:
- a) Interactions and process
 - b) Proposed amendments to criteria and BSCP40
 - c) Candidates for Standard Change
 - d) MHHS impacts
- 1.2 Agree the change types to be taken forward for Legal drafting and consultation

No.	Agenda item	Lead
1.	Welcome and Meeting objectives	Lawrence Jones – Chair (Elexon)
2.	P463 Summary of actions from WG1	Serena Tilbury – Lead Analyst (Elexon)
3.	Consideration of Standard Change interactions and process: <ul style="list-style-type: none"> • Energy Code Reform (ECR) • MDD and MHHS impacts • Cost/benefit analysis • De Minimis • Appeals and exceptions • Revisions to criteria • Housekeeping as a candidate for Standard Change 	Lawrence Jones
4.	Workgroup discussion	Elexon and Workgroup
5.	Next steps	Serena Tilbury
6.	AOB & Meeting close	Lawrence Jones

2. P463 Summary of actions from Workgroup 1

A summary of the actions taken from the first workgroup was reviewed. Members were invited to give updates or thoughts at this stage. Elexon noted that the action points would be taken under review through the course of the meeting.

3. Consideration of Standard Change interactions and process:

3.0 Energy Code Reform

The Workgroup discussed the implications of the Ofgem consultation on Energy Code Reform, which proposes to consolidate some codes, make codes managed by licenced code bodies, and standardise the code modification processes. The Workgroup agreed to continue the work on P463, as it could provide some useful input and lessons learned for the code reform work. The Workgroup also noted that the BSC would remain as a stand-alone code and that the modification processes for subsidiary documents may not be affected by the code reform. Given that the group expected most standard changes to impact subsidiary documents, the group did not believe there would be a big

impact on P463 from the Code Reform work. The workgroup discussed whether P463 actions would become redundant as a result of ECR and reached consensus that this was unlikely. The workgroup agreed that P463 progress should not be stalled on the grounds of upcoming code reform. When thinking about whether Market Domain Data (MDD) changes should be treated as a Standard Change, the group queried whether the Data Integration Platform rules (which will be used to send key Settlement information between market participants) would be in scope of the Code Reform and consequently if this would impact the ISD (MDD's upcoming replacement).

Action:

- **Jonathan Coe from Ofgem to look into whether the DIP change process comes under the purview of the Energy Code Reform, or if it gets picked up because of the fact that Elexon will be managing it in the early days.**

3.1 Market domain data and market-wide half-hourly settlement

The workgroup considered the impacts of changing the Market Domain Data (MDD) processes on the market-wide half-hourly settlement (MHHS) design and implementation. The workgroup acknowledged that MDD changes are outside the scope of the MHHS design and should not require a programme Change Request. However, the **Workgroup** also recognised that MDD changes may have different impacts on half-hourly and non-half-hourly settlement and that some MDD data sets may pose a higher risk to settlement than others, as was discussed at the first meeting. The **Workgroup** agreed to do some further analysis on MDD and revisit the issue at the next meeting.

Action:

- **Elexon to discuss with MHHS Programme whether any consequential changes from BSCP509 to BSCP707 would be considered material or would require a MHHS Change Request.**

3.2 Cost-benefit analysis

The Workgroup reviewed the cost-benefit analysis presented by Elexon, which estimated the costs and benefits of implementing P463 with different change candidates. The Workgroup noted that the analysis was based on some assumptions and uncertainties, and that the benefits would depend on the number and type of changes that could follow the Standard Change process. The workgroup also noted that there could be some qualitative benefits and value from implementing P463, such as faster delivery of changes, reduced complexity, and more flexibility. The group commented that the cost estimates were likely very conservative. The workgroup discussed the idea that work done so far on P463 is a sunk cost and therefore there is an argument to make use of this cost. 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.

3.3 De Minimis BMRS change process

The workgroup discussed the existing De Minimis BMRS change process, which allows for low-cost and low-risk changes to the BMRS system without a consultation. The meeting considered whether this process is relevant for P463 and whether it should be removed or used for some types of changes. It was agreed that the De Minimis process should not be removed at this stage, but should be kept under review.

3.4 Appeals and exceptions

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. The workgroup considered two options for the appeal process: one that would appeal to the panel, and one that would require a consultation and relevant committee comments. The Workgroup agreed on the first option, as it would be simpler and faster, and would still provide a check and balance. The group dismissed the second option as it was counter to what the Mod was trying to achieve and moved Standard Changes closer to the existing CP process. The workgroup also revised the criteria for Standard Changes, to make them more specific and reflective of the risk to settlement. The Workgroup agreed that the panel should decide whether a change meets these criteria, and that Elexon should recommend a minimum notice period for each change candidate.

3.5 Revisions to criteria

Proposed revisions to the Standard Change criteria were presented. The workgroup discussed the revisions, acknowledging the inclusion of reference to Settlement but seeking further consideration in case the reference to

Settlement is too subjective. It was suggested that one approach might be to proceed with criteria which directs an abundance of caution, which might be relaxed over time, once the new change type is established.

Action:

- **Workgroup to consider the proposed changes to the low-risk criteria, particularly the removed text (orange/yellow), the consequence of failure text (purple/red), and the inclusion of settlement (red).**

3.6 Housekeeping

Housekeeping changes to the BSC itself cannot be considered as a Standard Change, because the BSC Modification Procedures, including the housekeeping rules, are constrained by the transmission licence. However, changes to the BSC subsidiary documents are not constrained by the transmission licence. Therefore, these could potentially be considered within the scope of the Standard Change process. It was agreed to revisit the rationale for considering housekeeping changes as suitable for the Standard Change process (as they could be considered low risk, repeatable, predictable) at the next meeting, as there was not enough time at this meeting.

3.7 Workgroup discussion

Discussions took place throughout the meeting.

3.8 Next steps

Dates were given for upcoming meetings and review points. The third workgroup is proposed for W/C 8 April 2024.

Actions:

- **Elxon to issue updated redlining to the workgroup based on outcomes of discussion in WG2.**
- **Workgroup members are to review the updated redlining offline before the next meeting.**

3.9 AOB & Meeting close

A new idea for a Standard Change was raised – where elements that become obsolete over time, such as certain aspects related to Brexit, which are now redundant in the code, removing these redundant requirements could be considered a Standard Change. The question was raised about whether this could also apply to MHHS, where many things will become obsolete after go-live.

Actions:

- **Elxon to identify obsolete items and functions that might be used to form a basis for a Standard Change candidate.**

Actions arising from workgroup 2

No.	Action	Owner	Due by	Status
3.0 Energy Code Reform	Jonathan from Ofgem is to look into whether the DIP change process comes under the purview of the Energy code reform or if it gets picked up because of the fact that Elexon will be managing it in the early days.	Jonathan Coe	WG2	Open/Closed
3.1 MDD & MHHS	Elexon to discuss with Andrew Margan whether there are any issues with us changing the MDD processes in BSCP509.	Elexon	WG2	Open/Closed
3.5 Revisions to criteria	Workgroup to consider the proposed changes to the low-risk criteria, particularly the removed text (orange/yellow), the consequence of failure text (purple/red), and the inclusion of settlement (red).	Workgroup	WG2	Open/Closed
5 Next steps	Elexon to issue updated redlining to the workgroup based on outcomes of discussion in WG2.	Elexon	W/C 25 March 2024	Open/Closed
	Workgroup members are to review the updated redlining offline before the next meeting.	Workgroup	WG2	Open/Closed
6 AOB	Elexon to identify obsolete items and functions that might be used to form a basis for a Standard Change candidate. Table for further discussion at next workgroup meeting.	Elexon	WG2	Open/Closed