

## P464: ‘Housekeeping and updating BSC references to “Consumer Scotland”, “Generation Curtailment Validation Committee” and “GCVC”’

This housekeeping Modification proposes to replace any references to “Citizens Advice Scotland” with “Consumer Scotland”. It also proposes to replace any references to “Network Gas Supply Emergency Settlement Validation Committee” and “NGSESVC” to “Generation Curtailment Validation Committee” and “GCVC”. Additionally, it also proposes to correct 5 non-material errors and inconsistencies across 5 Sections of the Balancing and Settlement Code (BSC).

This Report Phase Consultation for P464 closes:

**5pm on 29 November 2023**

If no appeals are notified by this time, the Panel’s decision is final.



The BSC Panel has **approved** P464 as a Fast Track Self-Governance Modification



The BSC Panel does not believe P464 impacts the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC

This Modification is expected to impact:

- Elxon

E L E X O N

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

P464

Fast Track Self-Gov.  
Modification Report

9 November 2023

Version 1.0

Page 1 of 12

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## Contents

1	Summary	3
2	Why Change?	5
3	Solution	6
4	Impacts & Costs	9
5	Implementation	10
6	Panel's Initial Discussions	11
7	Panel's Decisions	12

## About This Document

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

This is the P464 Fast Track Self-Governance Modification Report, which Elexon has submitted to the Authority, the National Electricity Transmission System Operator (NETSO) and BSC Parties.

P464 is a Fast Track Self-Governance Modification, so it does not go to the Authority for decision. The BSC Panel has approved P464 for implementation on 29 February 2024.

In accordance with BSC Section F7.3, Parties have until 29 November 2023 to object to the Panel's decision, stating why they do not believe P464 meets the Fast-Track Self-Governance criteria. If no objection is notified by this time, the Panel's decision is final.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits and implementation approach. It also summarises the Panel's key views on the Modification.
- Attachment A contains the approved redlined changes to the BSC.



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### Not sure where to start?

We suggest reading the following sections:

- Have 5 minutes? Read section 1
- Have 15 minutes? Read sections 1, 7 and 8
- Have 30 minutes? Read all except section 6
- Have longer? Read all sections and the annexes and attachments.

P464

Fast Track Self-Gov.  
Modification Report

9 November 2023

Version 1.0

Page 2 of 12

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

## Why Change?

The Scottish government have created a new non-ministerial office (Consumer Scotland) following the passage of the [Consumer Scotland Act 2020](#)<sup>2</sup>, to act as a voice for consumers in Scotland. Though Citizens Advice Scotland still exists, the new Consumer Scotland has taken the seat formerly held by Citizens Advice Scotland on the BSC Panel. As such, the BSC needs to be amended to change any references to “Citizens Advice Scotland” to “Consumer Scotland”. This Modification will bring the BSC in line with changes made to Section C3 of the [Electricity Transmission Licence](#)<sup>3</sup> in 2022.

Also, Elexon (with oversight from the Imbalance Settlement Group (ISG)) amended the name of the Network Gas Supply Emergency Settlement Validation Committee (NGSESVC) to the Generation Curtailment Validation Committee (GCVC) with [CP1581 ‘Recommendation to update BSCP18 following Issue 105’](#)<sup>4</sup>. This Modification will bring Section B of the BSC in line with [CP1581 ‘Recommendation to update BSCP18 following Issue 105’](#)<sup>5</sup>.

Furthermore, Elexon has identified a total of 5 minor errors and inconsistencies across 5 Sections of the BSC. Such errors are identified in the Code from time to time and are recorded by Elexon to be addressed at an appropriate time in the future. These errors, although minor, may affect the reading of the Code.

## Solution

This Modification seeks to update names, and correct minor errors and inconsistencies identified in the BSC.

## Impacts & Costs

As all of the changes proposed under this Modification are minor housekeeping changes, there will be no material impacts on any existing Core Industry Documents, BSC Systems, BSC Parties, consumers or the environment.

The estimated cost to amend the BSC Sections is expected to be under £5k. No ongoing costs are expected.

## Implementation

The Panel has approved an Implementation Date of 29 February 2024 as part of the February 2024 standard BSC Release, as this is the most efficient Release to target.

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<sup>2</sup> <https://www.legislation.gov.uk/asp/2020/11/contents/enacted>

<sup>3</sup> <https://www.ofgem.gov.uk/sites/default/files/2023-03/Electricity%20Transmission%20Consolidated%20Standard%20Licence%20Conditions%20-%20Current.pdf>

<sup>4</sup> <https://www.elexon.co.uk/change-proposal/cp1581/>

<sup>5</sup> <https://www.elexon.co.uk/change-proposal/cp1581/>

## Decision

The BSC Panel unanimously agreed to raise and approve P464 as a Fast Track Self-Governance Modification. The Panel agreed with Elexon that P464 does not materially impact the EBGL provisions in the BSC.

### What is the issue?

The Scottish government have created Consumer Scotland, a new non-ministerial office following the passage of the Consumer Scotland Act 2020, to act as a voice for consumers in Scotland. Though Citizens Advice Scotland still exists, the new Consumer Scotland has taken the seat formerly held by Citizens Advice Scotland on the BSC Panel. As such, the BSC needs to be updated to change any references to “Citizens Advice Scotland” to “Consumer Scotland”. This Modification will bring the BSC in line with changes made to Section C3 of the [Electricity Transmission Licence](#)<sup>6</sup> in 2022.

Additionally, Elexon (with oversight from the Panel) amended the name of the Network Gas Supply Emergency Settlement Validation Committee (NGSESVC) to the Generation Curtailment Validation Committee (GCVC) with [CP1581 ‘Recommendation to update BSCP18 following Issue 105’](#)<sup>7</sup> on the basis that this offers a more customer-friendly and less cumbersome way for the committee to be referenced and interacted with by the industry. This Modification will bring Section B of the BSC in line with [CP1581 ‘Recommendation to update BSCP18 following Issue 105’](#)<sup>8</sup>

Furthermore, Elexon has identified a total of 5 minor errors and inconsistencies across 5 Sections of the BSC. Such errors are identified in the Code from time to time and are recorded by Elexon to be addressed at an appropriate time in the future. These errors, although minor, may affect the reading of the Code.

### Background

Consumer Scotland are a new organisation, and the Generation Curtailment Validation Committee is a new name for an existing Committee. Therefore, their names are not currently reflected in the BSC, which reduces the accuracy of the Code.

Also, minor errors are identified in the Code from time to time and are recorded by Elexon to be addressed at an appropriate time in the future. These errors, although minor, may affect the reading of the Code.

<sup>6</sup> <https://www.ofgem.gov.uk/sites/default/files/2023-03/Electricity%20Transmission%20Consolidated%20Standard%20Licence%20Conditions%20-%20Current.pdf>

<sup>7</sup> <https://www.elexon.co.uk/change-proposal/cp1581/>

<sup>8</sup> <https://www.elexon.co.uk/change-proposal/cp1581/>

## Proposed solution

Under BSC [Section F 'Modification Procedures'](#)<sup>9</sup> 2.1.1(d) (iv), Elexon can recommend a Modification Proposal to the Panel to rectify manifest errors, to correct minor inconsistencies and/or make other consequential changes to the Code.

This Modification proposes a total of 10 non-material housekeeping changes to the Code. Due to the minor and non-material nature of the proposed changes, these have been combined into a single Modification Proposal for efficiency.

Section B shall be amended as follows:

### [BSC Section B 'The Panel'](#)<sup>10</sup>

- “1.1 Establishment and composition”, changing “Citizens Advice Scotland” to “Consumer Scotland”.
- “2.3 Appointment of Panel Members by Citizens Advice or Citizens Advice Scotland”, changing “Citizens Advice Scotland” to “Consumer Scotland” in both the title and the subtext.
- “3.6 Network Gas Supply Emergency Settlement Validation Committee”, changing “Network Gas Supply Emergency Settlement Validation Committee” to “Generation Curtailment Validation Committee”
- “3.6.1 Network Gas Supply Emergency Settlement Validation Committee”, changing “Network Gas Supply Emergency Settlement Validation Committee” to “Generation Curtailment Validation Committee(s)”.
- B4.6.1(f) correcting “Chai” to “Chair”.

Section F shall be amended as follows:

### [BSC Section F 'Modification Procedures'](#)<sup>11</sup>

- “2.1 Modification Proposals”, changing “Citizens Advice Scotland” to “Consumer Scotland” (two instances).

Section L shall be amended as follows:

### [BSC Section L 'Metering'](#)<sup>12</sup>

- 2.3.2A, correcting reference to “paragraph 2.1.1(a)” to “paragraph 2.1.3(a)”.

Section T shall be amended as follows:

<sup>9</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures>

<sup>10</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-b-the-panel>

<sup>11</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures>

<sup>12</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-l-metering>

### BSC Section T 'Settlement and Trading Charges'<sup>13</sup>

- 4.3B.3, correcting “VBMUSDV<sub>ijj2</sub>” to “VBMUSDV<sub>ijj1</sub>”.

Section X-1 shall be amended as follows:

### BSC Section X-1 'General Glossary'<sup>14</sup>

- for the definition of “External System”, correcting the definition by removing “; except that during the Transition Period: means an electricity transmission system or electricity distribution system which is outside the area covered by the Total System and is electrically linked to a System;”.

Section Z shall be amended as follows:

### BSC Section Z 'Performance Assurance'<sup>15</sup>

- “2.1 Panel Committee”, changing “Citizens Advice Scotland” to “Consumer Scotland”.

Housekeeping justification	
Section B, 1.1	This is updating a name of an organisation, which falls under Fast Track Self-Governance criteria.
Section B, 2.3	This is updating a name of an organisation, which falls under Fast Track Self-Governance criteria.
Section B, 3.6	This is updating a name of a committee, which falls under Fast Track Self-Governance criteria.
Section B, 3.6.1	This is updating a name of a committee, which falls under Fast Track Self-Governance criteria.
Section B, B4.6.1(f)	This is correcting a minor spelling mistake, which falls under Fast Track Self-Governance criteria.
Section F, 2.1	This is updating a name of an organisation, which falls under Fast Track Self-Governance criteria.
Section L, 2.3.2A	This is correcting a typographical and referencing mistake, which falls under Fast Track Self-Governance criteria.

<sup>13</sup> <https://bscdocs.elxon.co.uk/bsc/bsc-section-t-settlement-and-trading-charges>

<sup>14</sup> <https://bscdocs.elxon.co.uk/bsc/bsc-section-x-1-general-glossary>

<sup>15</sup> <https://bscdocs.elxon.co.uk/bsc/bsc-section-z-performance-assurance>

Section T, 4.3B.3	This is correcting a typographical mistake, which falls under Fast Track Self-Governance criteria.
Section X-1	This is correcting a definition, which falls under Fast Track Self-Governance criteria.
Section Z, 2.1	This is updating a name of an organisation, which falls under Fast Track Self-Governance criteria.

The draft BSC legal text can be found in **Attachment A**.

## Benefits

The correction of minor typographical, formatting, referencing, and consistency errors in the BSC improves clarity and reduces the potential for misinterpretation of the Code. This helps to ensure that visitors to the Code receive a smooth and effective user experience.

## Legal text

6 Sections of the BSC will be impacted by this Modification. **Attachment A** contains the approved redlined changes to the BSC.

## Are there any (other) alternative solutions?

No.



## 4 Impacts & Costs

As all of the changes proposed under this Modification are minor housekeeping changes, there will be no material impacts on any existing Core Industry Documents, BSC Systems, BSC Parties, consumers or the environment.

### Estimated costs of P464

This Modification will be a document only change to update 6 Sections of the BSC. The estimated cost to amend the BSC Sections is expected to be under £5k. No ongoing costs are expected.



## Implementation Date

The Panel has approved an Implementation Date for P464 of **29 February 2024**, if no objections are notified.

## When would P450 be implemented?

Following the Panel's unanimous agreement to progress P464 as a Fast Track Self Governance Modification and that it should be approved, the Panel's decision along with this Fast Track Self-Governance Modification report was published within 1 Working Day (WD) and issued to the Authority, Transmission Company and each Party in accordance with BSC Section F7.2.2.

The 15 Working Day objection window will commence from this notification, closing on **29 November 2023**. If no objections are raised, P464 would then be implemented on **29 February 2024**.

## What is the Self-Governance Criteria?

A Modification that, if implemented:

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

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

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

P464

Fast Track Self-Gov.  
Modification Report

9 November 2023

Version 1.0

Page 10 of 12

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### Panel's views on the Modification

The Panel unanimously agreed that P464 should be raised (in accordance with Section F2.1.1(d)(iv)2) and progressed as a Fast Track Self-Governance Modification Proposal. They agreed with Elexon that it met the Fast Track Self-Governance Criteria. Further, the Panel approved P464, as they believed it better facilitated Applicable BSC Objective (d) for the reasons provided in section 6 above.

Regarding the proposed legal text, the Panel discussed whether the change to Section T would affect any calculations for market participants. The Panel invited comment from the Head of Market Design, who confirmed that "Due to a drafting error, there is an inconsistency in the order of the subscripts for data item Secondary BM Unit Supplier Delivered Volume (VBMUSDV). In Annex S-2 the subscripts are i2ji, in Section T the subscripts are the same but in a different order (iji2)." He also noted that it doesn't matter what order the subscripts are in, it is arbitrary, but that the order should be consistent throughout the BSC.

## 7 Panel's Decisions

The BSC Panel unanimously:

- **RAISED** this Modification Proposal in Attachment A, in accordance with BSC Section F2.1.1 (d) (iv);
- **AGREED** that this Modification **DOES NOT** impact the EBGL Article 18 terms and conditions held within the BSC;
- **AGREED** that this Modification should be progressed as a Fast Track Self-Governance Modification;
- **AGREED** that this Modification:
  - **DOES** better facilitate Applicable BSC Objective (d);
- **AGREED** that this Modification should be **approved**;
- **APPROVED** an Implementation Date of:
  - **29 February 2024** if no objections are notified;
- **APPROVED** the draft Legal Text;
- **NOTED** that Elexon will issue the Fast Track Self-Governance Modification Report (including the BSC Legal Text), which will then be subject to a 15 Working Day objection period.