BSC Modification Proposal Form	At what stage is this document in the process?

P474

Mod Title: Governance, funding and operation of the Data Integration Platform (DIP)

01 Modification

02 Workgroup Report

03 Draft Modification Report

04 Final Modification Report

Purpose of Modification:

This Modification proposes changes to the BSC to enable the governance, funding and operation of the Data Integration Platform (DIP). The proposed changes would create the DIP Rules. The DIP Rules would comprise a new section of the Code, to be known as the DIP Supplement, and seven new subsidiary documents. The proposed changes would place specific obligations on BSCCo (as the DIP Manager) and on DIP Users.

Does this Modification impact any of the European Electricity Balancing Guideline (EBGL) Article 18 Terms and Conditions held within the BSC?

☒ Yes ☐ No

	This is an Authority Led SCR Modification Proposal. It will not follow the standard Modification Procedures. Instead it will follow the timetable set by the Authority and the Authority Led SCR Modification Proposal procedure detailed in BSC Section F5.3A[1]. This Modification will be presented by the Proposer to the BSC Panel on 13 June 2024.
	High Impact: Suppliers, Metering community, Data services community, Distributors, BSCCo, RECCo, DCUSA
	Medium Impact: None
	Low Impact: None

[1] https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures#section-f-5-5.3

Contents

Timetable

The Proposer recommends the following timetable:	
Initial Authority Led SCR Modification Report presented to Panel	13 June 2024
Consultation (1 month)	17 June 2024 - 17 July 2024
Draft Authority Led SCR Modification Report presented to Panel	08 August 2024
Final Modification Report submitted to Authority	12 August 2024

Any questions?

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1 Why Change?

What is the issue?

The Data Integration Platform (DIP) is an industry system established to facilitate the implementation and operation of Market-wide Half Hourly Settlement (MHHS)[2], as per Ofgem's Decision on the reference architecture of the MHHS TOM[3]. Following industry consultation Ofgem published the Decision on the governance, funding and operation of an Event Driven Architecture for MHHS[4], stating that the DIP should be governed through the BSC. A modification to the BSC is required to give effect to this decision as the BSC does not currently include provisions for the governance, funding and operation of the DIP. Legal documentation setting out the requirements of the DIP Manager and DIP Users is necessary to ensure the enduring operation of the DIP, which is a vital component of the new settlement arrangements.

Background

The introduction of MHHS will result in a significant increase in the volume and frequency of data feeding into Settlement, due to the additional Meter readings available from smart and advanced meters. Consideration by the Architecture Working Group[5] (AWG) – a group of industry IT experts, from Suppliers, Supplier Agents, and software support companies – and consultation with industry led to a recommendation[6] that Event Driven Architecture (EDA) be used as the method for communicating data between all services and roles impacted by MHHS. Ofgem supported the AWG's recommendation, requiring industry to develop a hybrid architecture comprising the existing Data Transfer Service (DTS) and a new EDA platform.

EDA is a type of software where components generate and react to events, where an event is something of business significance. The software publishes an event when a significant event happens, such as registration information being updated or new Meter data becoming available. Authorised interested parties are notified that the business event has occurred, and can retrieve the content. This software design allows a single event to be consumed by many parties, and is ideal for high-volume, real-time and near real-time systems.

The MHHS EDA based system, known as the DIP, is a key component to support delivery of the MHHS TOM. The DIP will be able to respond to the increase in volume and frequency of data more quickly than the current arrangements. It will provide market participants with the platform that will be used to share data including Half-Hourly consumption information, meter technical details and registration information.

Following the Ofgem Consultation on the governance, funding and operation of an Event Driven Architecture[7], Ofgem published the Decision on the governance, funding and operation of an EDA for MHHS[8], which determined that the DIP should be governed through the BSC. Responding to this, Elexon

[2] https://www.ofgem.gov.uk/publications/electricity-retail-market-wide-half-hourly-settlement-decision-and-full-business-case
[3] https://www.ofgem.gov.uk/publications/decision-reference-architecture-market-wide-half-hourly-settlement-target-operating-model
[4] https://www.ofgem.gov.uk/decision/decision-governance-funding-and-operation-event-driven-architecture-market-wide-half-hourly-settlement
[5] https://www.elexon.co.uk/group/architecture-working-group-awg/
[6] https://www.elexon.co.uk/article/architecture-working-group-makes-recommendation-on-reference-architecture-to-support-mhhs/
[7] https://www.ofgem.gov.uk/publications/market-wide-half-hourly-settlement-mhhs-consultation-governance-funding-and-operation-event-driven-architecture
[8] https://www.ofgem.gov.uk/publications/decision-governance-funding-and-operation-event-driven-architecture-market-wide-half-hourly-settlement

established Issue 101 'Ongoing Governance, Funding and Operation of the MHHS DIP by BSCCo'[9] to gather industry input into developing a proposal for the operation, funding and governance of the DIP. The Issue Group included Elexon representatives, impartial industry volunteers, and representatives from the MHHS Programme who are responsible for the design and build of the DIP. The proposal from the Issue 101 Group was reviewed by Ofgem and amended to form this Modification Proposal.

Ofgem requested amendments to the legal text in order to avoid making changes to National Grid ESO's electricity transmission licence at a time when significant changes to that licence are already under way. Given that this licence sets out the process that BSC changes must follow, the main effect of proceeding without a licence change is that changes to the DIP arrangements within the BSC will follow the BSC Modification Procedures. The DIP operational arrangements set out in the DIP Subsidiary Documents are, however, largely unchanged. Please see the section on Legal Text Changes for a summary of the changes as compared with the proposal put forward as a result of discussions at the Issue 101 Group.

Desired outcomes

The desired outcome from this Modification is to amend the BSC to include provisions for the governance, funding and operation of the DIP. This will clarify to industry the requirements for the DIP Manager and DIP Users and enable the enduring operation of the DIP.

2 Solution

Proposed Solution

P474 proposes the creation of a new Section of the BSC, which would be known as the DIP Supplement. The DIP Supplement would set out:

- The governance arrangements relating to the DIP;
- The functions, duties and powers of the DIP Manager;
- The establishment, functions, duties and powers of the DIP Change and Advisory Board (DCAB); and
- The obligations and rights of DIP Users.

The DIP Supplement would be subject to the BSC Modification Procedures. The DIP Supplement would refer to and create obligations via DIP Subsidiary Documents (DSDs). The DSDs would detail the procedures and detailed arrangements relating to use of the DIP. Unlike the DIP Supplement, the DSDs would be subject to a bespoke change management process as detailed in DSD004.

There would be seven DSDs as follows:

- DSD001 – DIP Governance;
  - DSD001 Annex One – DIP Rules Implementation Dates and Transition Arrangements;
- DSD002 – DIP Connection and Operation;
  - DSD002 Annex One – DIP On-Boarding Non-Functional Checks;

[9] https://www.elexon.co.uk/smg-issue/issue-101/

    - DSD002 Annex Two – Detailed DIP Operational Requirements;
    - DSD002 Annex Three – The DIP-PKI (Public Key Infrastructure) Policy;
    - DSD002 Annex Four – Access Agreement;

- DSD003 – Assurance and Reporting;
- DSD004 – DIP Change and Document Management;
- DSD005 – DIP Funding and Budget;
- DSD006 – Data Management; and
- DSD007 – DIP Glossary.

In addition, there would be changes to BSC Section C, D, F, H and X-1 to facilitate the DIP Supplement and DSDs. These changes would be known as 'Code Embedded DIP Rules'

The DIP Supplement, Code Embedded DIP Rules and DSDs would collectively be known as the DIP Rules.

The arrangements detailed in the DIP Rules include:

- Governance – The DIP Manager would make all decisions about the DIP system, other than where the decision sits with the DIP Change and Advisory Board (DCAB) or Ofgem.

- DCAB – The DCAB would act as a specialist user group to advise the DIP Manager (and in limited circumstances, the BSC Panel). Additionally, they would determine whether to implement changes with material impact that do not impact the DIP Supplement, as well as hearing appeals against the DIP Manager's determinations. DCAB meetings would be open to anyone to attend, subject to any requirements for confidentiality. Appeals of DCAB decisions would be made to Ofgem. Ofgem will work with the DIP Manager to put in place procedures in relation to those appeals.

- DIP Connection – DIP connection and disconnection processes, including On-boarding, Off-boarding and suspension would be administered by the DIP Manager, including communication with Code Bodies and Ofgem where appropriate.

- Assurance – The DIP Manager would arrange risk-based assurance of all DIP Participants, including themselves and their service provider.

- Change management – as noted above, changes to the DIP Supplement would follow the BSC Modification Procedures. However, the BSC Panel would have to consider the analysis and recommendation of the DIP Manager (who will engage with the DCAB depending on the change's materiality) when making their recommendation on whether to approve the Modification. Changes to the DSDs would follow the bespoke DIP Change Request (CR) process set out in DSD004. Under this process, any person may seek to raise a DIP CR and the DIP Manager would act as a 'critical friend' to facilitate this and any subsequent representations that the Proposer wishes to make. The DIP Manager would determine whether DIP CRs should in fact be raised. The DIP Manager would also determine change progression routes, timetables and whether CRs should be implemented (other than where there is a material impact and the decision on implementation sits with the DCAB).

- Cost recovery – DIP Core Services (related to sharing of data required by Industry Codes) would be funded by Suppliers only based on MPAN share. A Standing Charge would recover a fixed amount each month. DIP Non-Core Services would be paid for by the beneficiaries at the DIP Manager's

discretion. This could include one-off DIP On-Boarding, change or data release costs.

- Data Management – All DIP Participants would be subject to the Data Protection legislation and Ofgem's Data Best Practice. The DIP Manager would check that provisions are in place as part of its DIP On-Boarding and assurance activity, but will not be responsible for confirming adherence. The DIP Manager would have an open data model for sharing DIP data.

To facilitate the proposed DIP arrangements it would also be necessary to amend several existing BSC Sections:

- BSC Section C 'BSCCo and its Subsidiaries'[10] to expand BSCCo's authorised activities to include acting as the DIP Manager;

- BSC Section D 'BSC Cost Recovery and Participation Charges'[11] to clarify that DIP Costs will not be included as BSC Costs and to allow (but not mandate) inclusion of DIP Costs in BSC invoicing, though separately identified;

- BSC Section F 'Modification Procedures'[12] to add that BSC Modifications affecting the DIP Rules require analysis from the DIP Manager;

- Section H 'General'[13] to detail what the DIP Supplement is and to make clear that failure to comply with the DIP Rules may constitute a breach under Section H3 of the BSC; and

- Section X-1 'General Glossary'[14] to add required DIP terms and amend the definition of Self Governance to exclude changes to the DIP Rules.

Benefits

This Modification will enable the governance, funding and operation of the DIP and clearly set out the requirements of the DIP Manager and DIP Users. The DIP is a vital component of the MHHS TOM, which this Modification will facilitate.

[10] https://bscdocs.elexon.co.uk/bsc/bsc-section-c-bscco-and-its-subsidiaries
[11] https://bscdocs.elexon.co.uk/bsc/bsc-section-d-bsc-cost-recovery-and-participation-charges
[12] https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures
[13] https://bscdocs.elexon.co.uk/bsc/bsc-section-h-general
[14] https://bscdocs.elexon.co.uk/bsc/bsc-section-x-1-general-glossary

3 Relevant Objectives

Impact of the Modification on the Relevant Objectives:

Relevant Objective	Identified impact
(a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence	Neutral
(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System	Neutral
(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	**Positive**
(d) Promoting efficiency in the implementation of the balancing and settlement arrangements	**Positive**
(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]	Neutral
(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	Neutral
(g) Compliance with the Transmission Losses Principle	Neutral

Applicable BSC Objective (c)

In its 2016 Energy Market Review findings, the Competition and Markets Authority (CMA) found that "the absence of a firm plan for moving to Half Hourly Settlement for domestic electricity customers is a feature of the market for domestic and small and medium-sized enterprises (SMEs) retail electricity supply in Great Britain that gives rise to an adverse effect on competition through the distortion of Suppliers' incentives to encourage their customers to change their consumption profile, which overall reduces the efficiency, and therefore the competitiveness, of domestic and microbusiness retail electricity supply." Ofgem's decision to implement MHHS, as set out in our decision of April 2021, effectively remedies this adverse effect on competition.

In the view of the Proposer this Modification will better facilitate Applicable BSC Objective (c) as it will enable the enduring operation of the DIP, which is central component of delivering MHHS. Successfully implementing MHHS will benefit competition by developing a more effective and flexible energy market, and will encourage increased market entry. MHHS will facilitate the development of new, innovative business models, products and services that consumers can engage with in the future.[15]

[15] For more information on the benefits of introducing MHHS, see chapter 5 of Ofgem's Final impact Assessment, April 2021.

Applicable BSC Objective (d)

In the view of the Proposer this Modification will better facilitate Applicable BSC Objective (d) as the DIP will support MHHS Implementation. This will in turn will result in a faster and more efficient Settlement system and processes, in which the Initial settlement run will take place 5-7 working days after the settlement date, the Final settlement run will take place 4 months after the settlement date, and the Post Final settlement run will - if required - take place 20 months after the settlement date. For more details see chapter 3 of Ofgem's MHHS Decision Document.

Applicable BSC Objectives (a), (b), (e), (f) and (g)

In the view of the Proposer this Modification will have no impact on these Applicable BSC Objectives.

4 Potential Impacts

Impacts on Core Industry Documents

Impacted Core Industry Documents			
☐Ancillary Services Document	☐Connection and Use of System Code	☐Data Transfer Services Agreement	☐Use of Interconnector Agreement
☐Retail Energy Code	☐Transmission Licence	☐System Operator Transmission Owner Code	☐Supplemental Agreements
☐Distribution Code	☐Grid Code	☒Other (please specify)	☐None

There will be changes to the Retail Energy Code (REC) and Distribution Connection and Use of System Agreement (DCUSA) to add references to the DIP and obligations to comply with the DIP Rules. This would mean that, where a DIP User is a Party to a Code, a breach of the DIP Rules shall be treated as a breach of the relevant Industry Code. For non-Code Parties, any breach of the DIP Rules will potentially lead to removal from the DIP. However, this drafting is being completed as part of the MHHS Code drafting workstream and is not considered as an impact of this Modification. Updates required to other Industry Codes relating to the DIP will be implemented as part of Authority-led SCR changes to implement the MHHS legal text for each Industry Code.

Impacts on BSC Systems

Impacted Systems				
☐CRA	☐CDCA	☐PARMS	☐SAA	☐BMRS
☐EAC/AA	☐FAA	☐TAAMT	☐NHHDA	☐SVAA
☐ECVAA	☐ECVAA Web Service	☐Elexon Portal	☐Other (Please specify)	☒None

There will be no impacts on BSC Systems.

Impacts on BSC Parties

Impacted Parties			
☒Supplier	☐Interconnector User	☐Non Physical Trader	☐Generator
☒Licensed Distribution System Operator	☐National Electricity Transmission System Operator	☐Virtual Lead Party	☐Other (Please specify)

The implementation of the DIP Rules will impact Suppliers and Distributors as they will be DIP Users with new obligations placed upon them by this Modification. Suppliers specifically will be impacted as they will be funding the ongoing operation of the DIP.

Impacts on consumers and the environment

Impact of the Modification on consumer benefit areas:	
Consumer benefit area	**Impact**
Improved safety and reliability This Modification is necessary for the ongoing operation of the DIP which is vital for delivery of the MHHS TOM. The DIP is a new message orientated event-driven middleware component that will support the flow of events and messages between industry participants. The DIP is expected to provide the necessary resilience, availability and scalability to enable the industry efficiently to move to MHHS and operate under the new arrangements. This allows industry to create more reliable processes for Settlement. MHHS is a key enabler for a smarter, more flexible electricity system and will facilitate the development of new, innovative business models. Using innovation enabled by MHHS to reward consumers for matching their consumption with periods of high generation from renewables such as wind and solar photovoltaics (PV) can help to integrate this generation into the system. This Modification is necessary for MHHS to be successfully implemented and for these benefits to be realised.	Positive
Lower bills than would otherwise be the case MHHS will ensure that charges to Suppliers for wholesale electricity more accurately match actual consumption, rather than relying on estimates of consumer usage. This will incentivise Suppliers to offer new tariffs and products that encourage a more flexible use of energy and help consumers to lower their bills, for example through time of use tariffs, automation, vehicle to grid solutions and battery storage. It will help to reduce cost to current and future consumers, through reducing the need for infrastructure investment and facilitating more efficient use of generation and network assets. The Ofgem Electricity Retail Market-wide Half-hourly Settlement: Decision and Full Business Case[16] estimates that MHHS will deliver net benefits to GB energy consumers in the range of £1.6bn-£4.5bn between 2021 and 2045. This Modification is necessary for the MHHS TOM to be successfully implemented and for these benefits to be realised.	Positive
Reduced environmental damage MHHS will encourage a more flexible use of energy and will create opportunities for the market to develop new products and services, including lowering the barriers for entry for new green energy Suppliers and helping to cost-effectively decarbonise the sector. This Modification is necessary for the MHHS TOM to be successfully implemented and for these benefits to be realised.	Positive

[16] https://www.ofgem.gov.uk/decision/electricity-retail-market-wide-half-hourly-settlement-decision-and-full-business-case

Impact of the Modification on consumer benefit areas:	
Consumer benefit area	**Impact**
Improved quality of service The DIP enables services to respond to real-world business far quicker and at a greater scale than at present. It will support the greater volume of data that will be generated through smart Meters and MHHS processes. This allows industry to create faster and more efficient processes for Settlement, providing an improved quality of service. The incentives created by MHHS will encourage development of new products and services for consumers, helping them use electricity more flexibly, saving money and reducing their carbon footprint. This Modification is necessary for MHHS to be successfully implemented and for these benefits to be realised.	Positive
Benefits for society as a whole MHHS will increase competition between Suppliers (including innovative new entrants to the market), create a more flexible electricity wholesale market and facilitate the development of new, innovative business models, products and services that consumers can engage with in the future. There will be numerous benefits, some quantifiable and some intangible. For more details of the quantified and unquantified benefits that we expect to arise from MHHS see chapters 4-6 of Ofgem's Final Impact Assessment published in April 2021.	Positive

Legal Text Changes

As detailed in the Solution section, a new BSC Section to be known as the DIP Supplement will be created and the following existing BSC sections will be impacted:

- BSC Section C 'BSCCo and its Subsidiaries';
- BSC Section D 'BSC Cost Recovery and Participation Charges';
- BSC Section F 'Modification Procedures';
- Section H 'General'; and
- Section X-1 'General Glossary'.

The P474 Proposed Solution is based on the proposal from the Issue 101 Issue Report. However, following review by Ofgem there have been a few notable amendments, as detailed in the following table.

Differences from the Issue 101 proposal to the P474 proposal	
Location	**Amendment to P474 drafting**
BSC Section D 4.7 ‘Combined invoicing of DIP Charges’	Clarification that, if BSCCo chooses to issue one invoice containing both BSC and DIP Charges, DIP Charges must be shown as a separate line item.
BSC Section D 6.7 ‘DIP Charges’	Clarification that any disputes relating to DIP Charges shall be addressed through the DIP Rules.
BSC Section F	Removal of references to the procedures in Section F not applying to the DIP Supplement – changes to the DIP Supplement will now follow BSC Modification Procedures.
BSC Section F 1.9 ‘Interpretation’	Addition of the definition of Code Embedded DIP Rules – any parts of the BSC that pertain to the DIP.
BSC Section F 1.9 ‘Interpretation’	Addition of the DIP Manger as an interested third party in relation to consultation.
BSC Section F 2.1 ‘Modification Proposals’	Addition that the DIP Manger can raise a Modification Proposal that amends the DIP Supplement or a Code Embedded DIP Rule.
BSC Section F 2.6 ‘Assessment Procedure’	Addition of the requirement for analysis and impact assessment from the DIP Manager for any Modification that would impact the DIP Supplement or any Code Embedded DIP Rules.
BSC Section F 2.7 ‘Report Phase’	Addition of the requirement for analysis and impact assessment from the DIP Manager to be included in the Modification Report for any Modification that would impact the DIP Supplement or any Code Embedded DIP Rules where the proposal has not been submitted to a Workgroup prior to the Report Phase.
BSC Section F 2.8A ‘Analysis of the DIP Manager’	Clarification added that analysis of a Modification by the DIP Manager should include impacts to the DIP, assessment against the DIP Applicable Objectives, and any other analysis that the DIP Manager and/or the DCAB reasonably consider relevant.
BSC Section F Annex F-1 ‘Contents of Reports’	Addition of impact assessments by the DIP Manager for Modifications related to the DIP Rules to the list of considerations for the Workgroup report.
BSC Section H 1.3A ‘The DIP Supplement’	Clarification that non-payment of DIP Charges would be a Section H default enforced by the Panel, and removal of references to the BSC Modification Procedures not applying to the DIP Supplement.
BSC Section X-1	Addition of DIP terms that have been in BSC Sections, e.g. DIP Rules and DCAB.

Differences from the Issue 101 proposal to the P474 proposal	
Location	**Amendment to P474 drafting**
BSC Section X-1	Amendment of the definition of Self- Governance Criteria to exclude changes to the DIP Supplement.
DIP Supplement 1.2 ‘General’	Amendment to reflect the fact that changes to the DIP Supplement will follow BSC Modification Procedures.
DIP Supplement 2 ‘Governance’	Process level information moved to the relevant DSD – DSD001 ‘DIP Governance’.
DIP Supplement 3.1 ‘DIP On-Boarding’	Process level information moved to the relevant DSD – DSD002 ‘DIP Connection and Operation’.
DIP Supplement 4.2 ‘DIP Assurance Strategy’	Process level information moved to the relevant DSD – DSD003 ‘Assurance and Reporting’.
DIP Supplement 5 ‘Change Management’	Amendments to reflect the fact that changes to the DIP Supplement will be subject to the BSC Modification Procedures.
Transmission Licence	No amendment to the Transmission Licence.

5 Governance

Self-Governance

☒ **Not Self-Governance –** A Modification that, if implemented:	
☒ materially impacts the Code's governance or modification procedures	☐ materially impacts sustainable development, safety or security of supply, or management of market or network emergencies
☐ materially impacts competition	☐ materially impacts existing or future electricity consumers
☐ materially impacts the operation of national electricity Transmission System	☒ is likely to discriminate between different classes of Parties
☒ involves any amendments to the EBGL Article 18 Terms and Conditions related to Balancing; except to the extent required to correct an error or as a result of a factual change	
☐ **Self-Governance –** A Modification that, if implemented:	
Does not materially impact on any of the Self-Governance criteria provided above	

This Modification Proposal should not be treated as Self-Governance. It amends the BSC Modification Procedures by adding the requirement for DIP Manager analysis for changes to the DIP Supplement and creates a new governance structure and a new change process for the DIP Subsidiary Documents. It also places new obligations on Suppliers, LDSOs and other BSC Parties (as well as non-BSC Parties) who will have to agree to abide by the DIP Rules to be able to use the DIP. This includes a material impact on Suppliers as they will be funding the DIP.

Progression route

The normal Modification Proposal progression routes, such as Assessment or Report Phase do not apply as this is an Authority Led SCR Modification Proposal. An Authority Led SCR Modification Proposal must follow the process set out in BSC Section F5.3A, which enables Ofgem to direct the progression and implementation timetable. The timetable set out on Page 2 is consistent with Ofgem's directed progression timetable for this Modification Proposal.

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

This Modification Proposal is linked to Ofgem's SCR on Electricity Settlement Reform and will be progressed as an Authority Led SCR Modification Proposal.

Does this modification impact the code drafting and system development for Market wide Half Hourly Settlement (MHHS), if so, how?

The proposed legal text for P474 has been developed with input from the MHHS Programme and is in line with the current build for the DIP. Should changes to the DIP design be made between the raising and implementation of P474, then a change will be made following implementation to align the legal text with the updated build.

Does this Modification impact any of the EBGL Article 18 Terms and Conditions held within the BSC?

This Modification will impact the EBGL Article 18 terms and conditions as specified in the mapping given in Section F Annex F-2. BSC Section H3, specified in the mapping, will be amended to require that the BSC Panel inform the DIP Manger of any Defaults. However this change is considered to be neutral against and consistent with the EBGL terms and conditions. P474 will also not extend the current mapping, as the DIP Supplement does not contain any requirements relevant to the EBGL terms and conditions.

Implementation approach

It is proposed that P474 be implemented on 1 October 2024 subject to the criteria within DSD001 Annex One as part of a Non-Standard BSC Release if the decision is received on or before 17 September 2024. If a decision is received after 17 September then it is proposed that the Modification be implemented 10 Working Days after Authority decision as part of a Special Release.