

CP Assessment Report

CP1511 'Clarification of BSCP40 definitions and processes'



Committee

BSC Panel

Recommendation

Approve

Implementation Date

29 March 2019
(March 2019 Ad Hoc Release)



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About This Document

This document is the Change Proposal (CP) Assessment Report for CP1511 which ELEXON will present to the BSC Panel at its meeting on 13 December 2018. The BSC Panel will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1511.

There are four parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the Imbalance Settlement Group's (ISG), Supplier Volume Allocation Group's (SVG), Performance Assurance Board's (PAB) and Trading Disputes Committee's (TDC) initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachment A contains the CP1511 proposal form.
- Attachment B contains the proposed redlined changes to deliver the CP1511 solution.
- Attachment C contains the full responses received to the CP Consultation.

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1 Why Change?

Background

The [BSC Procedure \(BSCP\) 40 'Change Management'](#) is the process used to ensure that BSC Changes are progressed in a controlled and auditable manner. One of the methods BSCP40 defines to achieve this is by maintaining a [Baseline Statement](#).

BSCP40 also separates Configurable Items into two categories; Category 1 Configurable Items and Category 2 Configurable Items, and explicitly states examples of each. The Baseline Statement defines whether each individual Configurable Item is Category 1 or Category 2.

ELEXON produces a Baseline Statement that is a definitive list of all BSC Sections and Configurable Items with version numbers of the current version, and where applicable, the responsible Panel Committee. The Baseline Statement sets out the categories for each Configurable Item. It is periodically updated whenever a BSC Section or Configurable Item is created, amended or deleted. ELEXON publishes this Baseline Statement on the BSC Website.

What is the issue?

One of the objectives of the BSC Change process is to maintain the integrity and robustness of the BSC and its subsidiary documents, including Code Subsidiary Documents (CSDs). It is therefore important that all CPs are introduced in a controlled and auditable manner.

Currently there are a number of critical definitions within BSCP40 whereby the clarity of such definitions could be improved. Further the relationship between the BSC Baseline Statement and Configurable Items does not align with the existing arrangements. It is not currently clear how new items should be categorised or what to include on the Baseline Statement.

While BSCP40 gives examples of Category 1 and 2 Configurable Items, and sets out the different process requirements for each, it does not clearly explain how and why a document is determined to be either category.

In practice the difference between Category 1 and 2 Configurable Items is in how the documents are treated within the CP process.

Where a CP is raised that impacts Category 1 Configurable Items, redlined drafting of the proposed changes to the documents must be included with the CP.

This is because Category 1 Configurable Items impose obligations on BSC Parties and/or Party Agents. As such it is important that industry is consulted on the redlined changes to these documents, so that the responses can be considered by the Panel or the relevant Panel Committee in making its decision to approve or reject the change.

Category 2 Configurable Items do not place direct obligations on Parties or Party Agents. Therefore the BSC Panel does not believe that redlined drafting needs to be provided for industry review until after the change has been approved, but prior to the change going live (during the implementation of the CP).¹

¹ Changes to Configurable Items resulting from Modification Proposals are progressed in accordance with section 3.9 of BSCP40. This gives the Panel discretion to decide whether Category 1 Configurable Item changes should be consulted on before, or after, the Modification is approved. Any Category 2 changes, plus any Category 1

Proposed solution

This CP seeks to implement a number of clarification and improvement changes relating to the BSC Baseline Statement and Configurable Items. These changes include clarifying the definitions of Baseline, Baseline Statement, and Configurable Item. As well as formalising the categorisation of Configurable Items, including the introduction of a new category; Category 3 Configurable Item.

This proposed solution is as follows:

Document restructure

To improve the readability of BSCP40, BSCP section 1.1 'Purpose and Scope' has been reorganised and a number of sub-headers have been included. A number of Housekeeping Changes² have also been identified throughout the BSCP.

Introduction of Baseline Statement definition

There is no formal definition of 'Baseline Statement' in the list of definitions in BSCP40 Section 2.2. However Section 1.1 of BSCP40 states:

'The Baseline Statement is a list of BSC Sections and all Configurable Items, together with the current live version.'

Therefore this CP proposes to introduce the following definition of Baseline Statement:

1.1.7 BSC Baseline Statement

The BSC Baseline Statement is a list of each BSC Section and BSC Configurable Item, showing:

- the master version;*
- the effective date of the master version;*
- the Modification Proposals and / or Change Proposals implemented since the previous master version;*
- the "Responsible Committee(s)" for the approval of changes to it; and*
- the categorisation of BSC Configurable Item.*

A new version of the BSC Baseline Statement will be produced when new versions of one or more BSC Sections and / or BSC Configurable Items become effective.

This definition will also be referenced in BSCP40 Section 2.2 'List of Definitions'

changes not consulted on before approval, are issued for industry review during the Modification's implementation.

² BSCP40 defines Housekeeping Changes as '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'.

Amendment to Baseline definitions

The definition of 'Baseline' listed within BSCP40 Section 2.2 'List of Definitions' does not describe what the Baseline is. Instead, the description better reflects the use of the Baseline Statement.

Therefore this CP proposes to introduce the following definition of Baseline to BSCP40 Section 2.2 'List of Definitions', to reference its function as the live version of the BSC and Configurable Items:

the master version of each BSC Section and BSC Configurable Item.

Amendment to Configurable Items definition

BSCP40 currently defines the term 'Configurable Item' as:

'all subsidiary documents to the BSC and any other product as agreed by BSCCo³ to be changed in accordance with this procedure.'

This definition does not reflect operational practice, as Configurable Items are agreed by the BSC Panel, not the Balancing and Settlement Code Company (BSCCo). As such, this CP proposes to introduce the following definition of Configurable Item to BSCP40 Section 2.2 'List of Definitions' as part of this CP:

'all Code Subsidiary Documents, plus other documents and systems, as agreed by the BSC Panel to be changed in accordance with this procedure, and included in the BSC Baseline Statement.'

Amendment to Category 1 and 2 Configurable Items definitions

BSCP40 lists examples of Category 1 and Category 2 Configurable Items, however it does not state how the Configurable Items have been categorised. This CP proposes to clarify the rationale for how Configurable Items are categorised; and subsequently remove the list of specific Category 1 and Category 2 Configurable Items from BSCP40.

The new definition for Category 1 BSC Configurable Item will be:

a BSC Configurable Item that imposes obligations on BSC Parties and/or Party Agents, as such BSC Panel believe redline drafting of the proposed changes to the BSC Configurable Item must be included with the Change Proposal.

The new definition for Category 2 BSC Configurable Item will be:

a BSC Configurable Item that does not impose obligations on BSC Parties and/or Party Agents, as such the BSC Panel do not believe redline drafting of the proposed changes to the BSC Configurable Item must be included with the Change Proposal.

Introduction of Category 3 Configurable Item definition

There has also been an increase in the number of new configurable items being produced, which are not amended by Modifications or CPs. As such, this CP proposes to introduce a

³ Balancing and Settlement Code Company (ELEXON).

new category of Configurable Items, Category 3 Configurable Items, to identify these documents as having their own change process.

A clarification will be made to the Market Index Definition Statement (MIDS) change process in BSCP40, to remove the reference to being able to raise Change Proposals against the MIDS.

Consequential changes following Configurable Item categorisation

As a consequence of applying the above definitions of Category 1, 2 and 3 Configurable Items, there will be changes to some existing documents and systems on the Baseline Statement.

The Code Subsidiary Documents Architectural Principles will have its category amended to Category 2 Configurable Item. This is consistent the change process previously used to amend the document.

The Code Subsidiary Documents Architectural Principles will also been amended as part of this CP, to ensure it is consistent with the proposed changes. As a Category 2 Configurable Item, the redlining for the Code Subsidiary Documents Architectural Principles will be consulted on as part of the implementation of this CP.

The following existing documents will have their category amended to Category 3 Configurable item:

- Loss of Load Probability Calculation Statement
- Market Index Definition Statement

Further, the Supplier Volume Allocation Agent (SVAA) BSC Agent software and related documents will be removed from the BSC Baseline Statement, as these documents do not require consultation with industry. This is beneficial as there are currently documents listed on the Baseline Statement that are not used by, or required by, BSC Parties or Party Agents in any way to be able to perform their duties under the BSC.

These documents and systems are as follows:

- SVAA⁴ (ISRA) Software
- SVAA (ISRA⁵) Conceptual Process Model
- SVAA (ISRA) Functional Definition & User Catalogue
- SVAA (ISRA) Installation Guide
- SVAA (ISRA) Logical Data Design
- SVAA (ISRA) Operations Guide
- SVAA (ISRA) System Management Guide
- SVAA (ISRA) Technical Specification

This is consistent with the treatment of Central Volume Allocation (CVA) BSC Agent software and related documents, which are not included in the BSC Baseline Statement. This will improve the consistency of document categorisation on the Baseline Statement. For the avoidance of doubt, the SVAA Service Description and SVAA User Requirements Specification (URS) will remain unchanged on the Baseline Statement as Category 2 Configurable Items.

⁴ Supplier Volume Allocation Agent.

⁵ Initial Settlement and Reconciliation Agency.

For the avoidance of doubt, no other Configurable Items will be affected by the solution proposed by this CP and will therefore remain categorised as per their current status. These documents will continue to be maintained and amended through internal BSCCo controlled change processes. This will also improve the consistency of documents on the Baseline Statement.

Amendment to Project definition

BSCP40 defines the term 'Project' as:

'discrete set of activities which will implement changes and/or correct errors by amending one or more of the Configurable Items.'

This definition does not reflect operational practice, as the implementation of changes is completed through BSC Releases. As such, this CP proposes to amend the term 'Project' to 'BSC Release'.

Proposer's rationale

This CP will ensure that BSCP40 is clear and unambiguous and that it reflects current operational practices. It is important that documents remain fit for purpose and use.

The changes proposed will make clear whether a new Configurable Item should be categorised as a Category 1, 2 or 3 BSC Configurable Item. The changes will clarify that the BSC Panel decides which category a new item should be and who should be responsible for that item (the Panel or a Panel sub-Committee).

The removal of the SVAA documents will improve the consistency of documents on the Baseline Statement, as these documents do not require consultation with industry.

Proposed redlining

Attachment A contains the proposed changes to BSCP40 to deliver CP1511.

The SVG and ISG jointly own BSCP40, however as this CP results in the removal of documents from the BSC Baseline Statement, the Final CP Report will be considered by the BSC Panel for decision for efficiency.

3 Impacts and Costs

Central impacts and costs

Central impacts

CP1511 will require a change to BSCP40. No Central System changes are required and there will be no impact on BSC Parties or BSC Agents.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">• BSCP40• Code Subsidiary Documents Architectural Principles• BSC Baseline Statement	<ul style="list-style-type: none">• None

Central costs

The central implementation costs for CP1511 will be approximately £600 to implement the document changes, including internal procedures.

4 Implementation Approach

Recommended Implementation Date

CP1511 is proposed for implementation on **29 March 2019** as part of an ad hoc March 2019 BSC Release.

ISG's initial views

CP1511 was presented to the ISG for information at its meeting on 23 October 2018 (ISG210/07).

The ISG did not provide any further comments or additional questions to include in the consultation.

PAB's initial views

CP1511 was presented to the Performance Assurance Board (PAB) for information at its meeting on 25 October 2018.

A PAB member queried whether the proposed BSCP40 changes would conflict with those being proposed under [P370 'Allow the Panel to designate non-BSC Parties to raise Modifications'](#). ELEXON confirmed that should the proposed solutions for CP1511 and P370 be approved, the redlining for BSCP40 would be configured, which would likely result in one or two stylistic, non-material changes, to ensure no conflicts upon implementation.

The PAB did not provide any comments or additional questions to include in the consultation.

SVG's initial views

CP1511 was presented to the SVG for information at its meeting on 30 October 2018 (SVG213/05).

The SVG did not provide any further comments or additional questions to include in the consultation.

TDC's initial views

CP1511 was presented to the Trading Disputes Committee (TDC) for information at its meeting on 1 November 2018.

The TDC did not provide any further comments or additional questions to include in the consultation.

6 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment B.

Summary of CP1511 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1511 proposed solution?	2	0	0	0
Do you agree that the draft redlining delivers the intent of CP1511?	2	0	0	0
Will CP1511 impact your organisation?	0	2	0	0
Will your organisation incur any costs in implementing CP1511?	0	2	0	0
Do you agree with the proposed implementation approach for CP1511?	2	0	0	0
Do you have any further comments on CP1511?	1	1	n/a	n/a

Comments on the CP

Both respondents to the CP Consultation agreed with the proposed solution. One respondent commented that their support was on the basis that proposed solution would make it easier for market participants to understand the relevant areas of the BSC that changes are being proposed against. The other respondent noted that the clarification and improvement changes proposed to BSCP40 definitions and processes seem sensible and clear.

Both respondents agreed with the implementation approach for CP1511.

One respondent noted the limited impact BSC Parties.

Comments on the proposed redlining

No comments were received on the draft redlined text for CP1511.

7 Recommendations

We invite you to:

- **APPROVE** the proposed changes to BSCP40 for CP1511; and
- **APPROVE** CP1511 for implementation on 29 March 2019 as part of the March 2019 ad hoc BSC Release.

Appendix 1: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code
BSCCo	Balancing and Settlement Code Company
BSCP	BSC Procedure
CP	Change Proposal
CPC	Change Proposal Circular
CSD	Code Subsidiary Documents
ISG	Imbalance Settlement Group
ISRA	Initial Settlement and Reconciliation Agency
PAB	Performance Assurance Board
SVAA	Supplier Volume Allocation Agent
SVG	Supplier Volume Allocation Group
TDC	Trading Disputes Committee

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	BSCP40 page of the ELEXON website	https://www.elexon.co.uk/csd/bscp40-change-management/
2	BSC Sections page of the ELEXON website	https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/
9	P370 page of the ELEXON website	https://www.elexon.co.uk/mod-proposal/p370/