# **Initial Written Assessment**

# P379 'Enabling consumers to buy and sell electricity from/to multiple providers through Meter splitting'

This Modification will enable consumers to be supplied by multiple Trading Parties through Balancing and Settlement Code (BSC) Settlement Meters at the Boundary Point. It will achieve this through the creation of a new Party Agent role, the Customer Notification Agent (CNA), who would reconcile power flows through the Settlement Meter, enabling accurate allocation of volumes and costs to different Trading Parties, which in turn will allow these Trading Parties to reflect accurate volumes in their bills and payments to consumers.



ELEXON recommends P379 is progressed to the Assessment Procedure for an assessment by a Workgroup

This Modification is expected to impact:

- Suppliers (Licensed and Exempt)
- Virtual Lead Parties (VLPs)
- Distribution System Operators (DSOs)
- Generators
- Balancing and Settlement code Company (BSCCo)
- Master Registration Agreement (MRA)
- Distribution Connection Use of System Agreement (DCUSA) (potential)
- Connection and Use of System Code (CUSC) (potential)
- Grid Code (potential)



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## About This Document

This document is an Initial Written Assessment (IWA), which ELEXON and the P379 Proposer will present to the BSC Panel on 10 January 2019. The Panel will consider the recommendations and agree how to progress P379.

There are two parts to this document:

- This is the main document. It provides details of the Modification Proposal, an assessment of the potential impacts and a recommendation of how the Modification should progress, including the Workgroup's proposed membership and Terms of Reference.
- Attachment A contains the P379 Proposal Form.



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## **1** Why Change?

#### What is the issue?

In the view of the Proposer, this Modification will address a significant barrier to competition in the market rules whereby multiple Trading Parties are unable to compete for behind the Meter energy volumes, measured at the same Settlement Meter at the BSC Boundary Meter Point. The Proposer outlines that the existing arrangements don't adequately facilitate the development of local energy markets and supply innovation, and effectively mean there is a monopoly of one Party, the default Supplier, over a consumer's energy volumes behind a Settlement Meter at any given time, restricting competition and innovation.

#### **Existing Shared Metering Arrangements**

BSCP550 'Shared SVA Meter Arrangement of Half Hourly Import and Export Active Energy', currently provides a method for Suppliers to allocate a share of Metered Volume through one Meter to two different Parties. The volume to be shared is determined via a schedule submitted in advance, with a framework agreement in place for each involved Meter. Energy is then divided between Suppliers, in accordance with the schedule, by the Half Hourly Data Collector (HHDC).

While it is currently technically and commercially possible to disaggregate a consumer's volumes between different Trading Parties though the Supplier Volume Allocation (SVA) Shared Metering Arrangements, the Proposer suggests there are cost and competition barriers to this approach, including that the procedure;

- only applies to Settlement Meters that are Half Hourly (HH) capable;
- requires a degree of manual intervention between the respective Suppliers and the appointed HHDC;
- requires Suppliers to submit information regarding how they will share supply in advance (usually as fixed proportions which isn't necessarily fully accurate in regards to total volumes);
- requires Suppliers to appoint the same Meter Operator Agent (MOA) and HHDC, which may constrain competition;
- is only available to Parties registered as Suppliers in the BSC;
- requires the duplication of meter registration details for each participating Supplier;
- requires a new agreement for each individual site; and
- requires agreement of all participating Suppliers.

The SVA Shared Metering arrangements were designed for use at large, non-domestic sites. They may not offer a viable solution in terms of facilitating multiple Suppliers (including peer-to-peer trading) or use in the domestic or smaller commercial sectors.

Furthermore, while they enable an ex ante allocation, they would not support adjustment in the light of real-time consumer response based on technological or commercial interventions. This gives the default Supplier who registers the Settlement Meter 286/04 P379 Initial Written Assessment 8 January 2019

Version 1.0 Page 3 of 20 © ELEXON Limited 2019 considerable market power, and this position in effect forecloses much of the potential market being opened up by demand-side and smart techniques.

#### Wider Market Change Considerations

Ofgem as the Authority is considering important and wide-ranging changes in this area, some of which would seek to introduce some of the same benefits as this Modification (e.g. work on reforming the Supplier Hub and introduction of market-wide HH Settlement). The implementation and benefits of this work will likely materialise in the forthcoming years, but probably not before 2023. This Modification is not intended to substitute or displace these longer-term wider market developments, but rather bring forward a change within the existing rules that would enable a number of the benefits of changing and opening up the supplier hub principle in the shorter term. The outcomes of this Modification solution, as developed by the P379 Proposer and Workgroup are also expected to produce learnings that will assist in the development of the longer-term solutions.

Therefore, experience under this Modification will be an important contribution to further work by Ofgem (and the Department for Business Energy and Industrial Strategy (BEIS)) in assisting further decentralisation of the electricity market.

#### **Modification Support**

New Anglia Energy has recently acceded to the BSC and is an exempt Supplier. New Anglia Energy is the Proposer of P379. The principle behind this Modification has support from a range of BSC Trading Parties, including OVO Energy and Cooperative Energy, and non-BSC parties, including Powervault and Verv.

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## **2** Solution

#### **Proposed Solution**

This proposal would bring forward changes to the SVA market arrangements to allow consumers to buy electricity from (or sell electricity to) multiple Trading Parties at the BSC Boundary Point Meter. It would do this by splitting volumes through a single BSC Meter to different Trading Parties. This disaggregation and reallocation process allows the consumers to effectively have two (or more) relationships for their energy volumes: one with a 'main' or 'default' Supplier (who would continue to be responsible for metering and data collection/data aggregation activities under the BSC); and others with other Trading Parties.

This change will allow decomposition of commercial aspects of the existing Supplier Hub, better facilitating competitive local energy markets and new balancing services. The technologies and case studies based around commercial pilot schemes already exist, but the activities are not recognised in the BSC framework.

At a high level this solution will involve:

- an agreed method for measuring and assuring volumes of energy at participating sites and where relevant from in front of the Meter (e.g. sharing of output from grid-connected storage), and its reconciliation to Boundary Settlement Points registered by the default Supplier;
- a new BSC Party that would facilitate the flow of contract notifications and Meter volume adjustments to facilitate Meter Splitting – the 'Customer Notification Agent (CNA)'; and
- changes to the Supplier Volume Allocation Agent (SVAA) and related data flows to support Settlement Meter data adjustments.

The relevant Suppliers will be notified of any adjustments. The purpose of notifying Suppliers of adjustments made to their energy volumes is to allow Settlement of default Meters to be made whole and to allow individual Trading Parties to adjust their bills to the consumer accordingly to share benefits.

The solution suggests that Suppliers registering default Meters would not be allowed to opt out their consumers from buying electricity from third parties, as this would be a barrier to competition.

#### The role of the CNA

The solution to this Modification requires the creation of a new Party Agent role, the CNA, who will reconcile power flows through the Settlement Meter, enabling accurate allocation of volumes and costs. This will enable Trading Parties to reflect these volumes in bills and payments to consumers. The CNA role would be to facilitate Meter Splitting, rather than to participate in energy trading itself, by acting as the intermediary for Parties to submit data into Settlement. It would likely also be engaged with both existing and new performance assurance processes. Therefore, it would not need to be licensed, but users of the CNA service would need to be licensed Suppliers or, subject to the relevant thresholds, licence exempt Suppliers.

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The CNA role would be to:

- notify BSC Central Systems of the Metering Systems for the consumers, Generators and Suppliers involved in energy trades or reallocations under the relevant scheme;
- notify the associated energy volumes and ensure consistency with the existing contract notification regime<sup>1</sup>, and
- notify adjustments to metered volumes to reflect volumes to be attributed to additional Suppliers.

The CNA will notify BSC Central Systems of energy trades/allocations as soon as they have been made, including the energy volume traded and the Metering System(s) involved in each trade. BSC Central Systems will then adjust the total aggregate energy volumes assigned to the two Parties subject to the trade/reallocation. As part of the adjustment process, and where appropriate, the traded volumes will be verified against the Half Hourly Data Aggregator (HHDA) volumes for the relevant Metering Systems.

#### SVAA

The SVAA will additionally be required to make adjustments to the Metered Volumes of the default Supplier notified by the CNA and to notify the CNA and the Supplier of adjustments made.

#### **Meter Point Administration Service**

Local energy or peer-to-peer trades in respect of small-scale generation could require Export Metering Systems to be registered for Settlement purposes in the Meter Point Administration Service (MPAS). This is not mandatory for licence-exempt generation and supply, but engaged consumers should at least have the option of registering volumes.

#### Wider Market Considerations

The proposed solution can be implemented alongside other on-going changes taking place on the wider system, including the removal of Feed-in-Tariffs (FiTs) from the market from 31 March 2019. Further, it can be implemented alongside workstreams to deliver (among other things) integration of storage batteries, faster switching and market-wide HH Settlement.

To recognise these on-going developments, the Modification Proposal suggests that for a domestic or smaller site to be eligible, the site owner would have to be offered a HH Meter as a condition of entering the scheme.

#### **Performance Assurance**

Appropriate metering and performance assurance is a key consideration of this solution. Energy volumes will need to be measured using an appropriate measurement device, set out in a relevant Code of Practise (CoP). Consideration will need to be given to the assurance of these and of the CNA, and to ELEXON's role in overseeing this. New accession and assurance methods developed as part of the P344 'Project TERRE' changes



#### What are Feed-in-Tariffs (FiTs)?

FiTs is a government scheme intended to encourage the prevalence of renewable and lowcarbon generation. It pays consumers for volumes generated through certain low carbon technologies, with the scheme being funded by Suppliers, through levies on consumer bills.

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<sup>&</sup>lt;sup>1</sup> Unlike an ECVNA they would need to be authorised by the third party licensed (or exempt) Supplier whose trades they are notifying, rather than by the default Supplier.

could be used as a starting point but, however, a new CoP might be needed or be a better solution and should be discussed by the Workgroup.

Suppliers will need to be confident that adjustments submitted into BSC Settlement by CNAs have been calculated accurately. This can be achieved by requiring CNAs to accede to the BSC as a new type of Party Agent. This would be a 'lighter touch' BSC Party role, in a similar manner to the principle of a VLP (as adopted for P344) in comparison to a Trading Party. Accession to the BSC would allow appropriate Performance Assurance Techniques (PATs) to be applied to CNA activities.

## **Applicable BSC Objectives**

The Proposer suggests that this Modification Proposal impacts the Applicable BSC Objectives in the manner outlined in the table below:

The Workgroup will consider the P379 solution against the Applicable BSC Objectives as part of the Assessment Procedure.

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	Positive
(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	Neutral
(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]	Positive
(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

#### **Objective (b)**

The Proposer initially suggests that the solution to this Modification Proposal will better facilitate Applicable BSC objective (b) as it will facilitate a benefit to system management at the local level. This will enable better judgements on residual balancing by National Grid as the Electricity System Operator (ESO). This Modification, in conjunction with the introduction of VLPs, will also create the potential for greater participation in the Balancing Mechanism (BM), thus supporting system operation by providing the ESO with a greater range of options for economic and efficient system balancing. By creating greater efficiency at local level and through the interaction with system operation, this Modification is consistent with Ofgem's initiatives to achieve more efficient whole system outcomes.

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#### **Objective (c)**

The Modification would better facilitate applicable BSC Objective (c) as it will remove barriers to competition in the energy markets. The current single ownership of the Meter volumes prevents competition being facilitated behind the Meter and greatly limits the development of innovation that could ultimately benefit consumers. Removing this barrier would better facilitate competition between Suppliers and other providers operating in the market, including in the provision of new services facilitated by this Modification.

#### **Objective (e)**

This Modification better facilitates Applicable BSC Objective (e) as the European Regulation strongly supports consumer choice and demand-side integration, both of which are key objectives of this Modification.

## **Implementation approach**

Whilst the solution to this Modification Proposal should be implemented at the earliest opportunity in order for the full market and consumer benefits to be realised at the earliest stage, the final implementation approach will depend on the solution to be determined by Workgroup. The Proposer initially requested that the April 2020 standalone BSC Release be targeted.

Once the Proposer and Workgroup have developed the full solution, it will be impact assessed across BSCCo service providers and market participants to determine the most appropriate Implementation Date. These development costs and timescales will help determine the Implementation Date that will be presented to the BSC Panel for its initial recommendations as part of the Assessment Report in September 2019.

## Legal Text

The legal text to deliver the solution to this Modification Proposal will be developed during the Assessment Procedure.

As part of the Assessment Procedure, the Workgroup will determine whether it wishes for other Code Subsidiary Documents (CSDs) impacted by this Modification to be developed in advance of the Panel and Authority making their respective final decisions on the merits of the Modification.

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## 3 Areas to Consider

In this section we highlight areas which we believe the Panel should consider when making its decision on how to progress this Modification Proposal, and which a Workgroup should consider as part of its assessment of P379. We recommend that the areas below form the basis of a Workgroup's Terms of Reference, supplemented with any further areas specified by the Panel.

#### **P379 Areas to Consider**

The current solution proposal only includes provisions for HH Metering Systems to be applicable for the splitting of energy volumes between Trading Parties. However, the Workgroup should consider whether there are benefits of expanding this to the Non Half Hourly (NHH) market as well. The challenges and potential complexity/cost implications should also be considered during these discussions.

The Workgroup should consider how export volumes should be considered at the BSC Boundary Point. In particular, to what extent the metering of export should be mandatory, or alternatively whether profiling of export is appropriate and effective in certain cases.

One of the key parts of the solution that P379 seeks to implement is the ability for metered volumes at the Boundary Point to be split between multiple Trading Parties. Therefore, the methodology used to allocate volumes between Trading Parties should be carefully considered by the Workgroup, to ensure that the most appropriate method, in regards to cost, complexity and effectiveness is developed.

To ensure that the solution continues to deliver effective allocation of metered volumes at the Boundary Point, appropriate PATs shall be required. These may be similar to, or make use of existing PATs, or may be new PATs developed for the P379 solution, as developed by the Workgroup.

The Proposer suggests that new Profile Classes (PCs) or a new allocation methodology could be required where the consumer considers it infeasible or uneconomic to adopt a full smart metering solution at the Boundary Point, and at all measurement points behind the default Meter. How representative and extensive the methodology, or assessments of PC would need to be, especially where the site owner is still reliant on NHH consumption metering is an important consideration. The issue of whether coverage should be only to HH or also include NHH meters should be discussed by the Workgroup during the Assessment Procedure.

The principles being proposed under P379 interact with work currently progressing through in-flight BSC Modification <u>P376 'Utilising a Baselining Methodology to set Physical</u> <u>Notifications for Settlement of Applicable Balancing Services'</u>. The P379 Workgroup should consider how its solution being developed will interact with the work under P376, which will include whether new standards for metering should be introduced through a new CoP, or whether arrangements can be included within existing CoPs. For instance, a new CoP could define suitably accredited Metering Systems considered appropriate. For the avoidance of doubt, this proposal is not seeking to introduce arrangements for the splitting of metered volumes at asset level metering (seeking to be introduced by in-flight BSC Modification <u>P375 'Settlement of Secondary BM Units using metering behind the site Boundary Point'</u>.)

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Consideration will be required of how fixed charges associated with the Settlement Meter should be allocated to different Suppliers. Volumetric charges would likely follow volumes, but fixed charges may require further consideration. This issue may become more significant with a shift to higher levels of fixed network charges following implementation of the Targeted Charging Review. Further, consideration will need to be given to how the costs of introducing and maintaining Metering Systems are allocated.

Under P379, the scope for operation of the CNA role proposed will require consideration. The Proposer has assumed that any party would be able to seek qualification in this capacity (as could, for instance, existing contract notification agents), but also envisages that competing CNAs may look to work with Electric Vehicle (EV) or battery storage specialists, so an individual CNA would not need to be tied to a specific Settlement Meter. The Working Group will wish to consider this issue further to determine how the CNA role can be scoped such that it will remain appropriate both for current and near future market developments.

In their proposal, the P379 Proposer notes that they do not believe the current shared metering arrangements deliver the intentions of a fully competitive market without perceived barriers to entry. The Proposer has outlined their views for this in the P379 Proposal form. However, some market participants have expressed a view that they believe the current shared metering arrangements are adequate, or could be adequate subject to amendment. Therefore, the Workgroup convened for P379 should consider interactions with the current shared metering arrangements and should seek to develop a solution to this Modification in a cost effective manner that will fully deliver the intended benefits of the change.

Depending on the solution developed by the P379 Proposer and Workgroup, there may be cross-Code impacts on the MRA, DCUSA, CUSC and Grid Code. During the development of the solution, where impacts arise, ELEXON will engage with the appropriate Code Administrators to ensure that cross-Code impacts can be addressed, ensuring the timely delivery of the solution to this Modification. The P379 Workgroup should consider impacts arising from the solution it develops on the MPAS, as appropriate registration will be required to ensure the accuracy of Settlement through the operation of the new arrangements.

Alongside these extra areas for consideration, the P379 Workgroup shall consider the standard Modification Terms of Reference (ToR) items as included in the table below.

#### **Additional Considerations**

Depending on the solution developed by the Proposer and P379 Workgroup, there may be a need to convene further workshops with specific expertise (for example metering, assurance) throughout the Assessment Procedure. Should further market expertise be required throughout the development of the solution, ELEXON as the BSCCo will ensure that appropriate knowledge is present in order to develop a robust solution to P379. This may include, but not be limited to further Workgroups and/or workshops to assist the P379 Proposer and Workgroup in developing its solution.

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## **Workgroup Terms of Reference**

In consideration of the aforementioned items, the table below summarises the areas we believe a Modification Workgroup should consider as part of its assessment of P379 and hence form the Workgroup's ToR:

Areas to Consider Whether NHH Meters should be included within the solution alongside HH Meters How export volumes should be treated at the Boundary Point The methodology to be used for allocating volumes between Trading Parties, and the associated costs and benefits of different approaches Appropriate Performance Assurance Techniques for the P379 solution Whether new Profile Classes are required or would be beneficial for the solution Interaction with proposals for asset level metering (P376), including whether a new CoP is required Allocation of Metering system charges and responsibility for Metering System costs The scope of the CNA role Interactions with the current shared metering arrangements under the BSC Cross-code impacts resulting from the solution developed, including impacts on the MPAS registration system What changes are needed to BSC documents, systems and processes to support P379 and what are the related costs and lead times? Are there any Alternative Modifications? Should P379 be progressed as a Self-Governance Modification? Does P379 better facilitate the Applicable BSC Objectives compared with the current baseline?

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## 4 Proposed Progression

#### **Self-Governance**

This Modification is likely to have a material and beneficial effect on existing and future electricity consumers, competition in the supply of electricity, commercial activities connected with the supply of electricity, and matters relating to sustainable development, security of supply and the management of the market. Therefore, it should not be treated as a Self-governance Modification as it materially impacts Self-Governance criterion (i), ii), and (iv).

#### Urgency

This Modification is not linked to an imminent issue or current issue that if not addressed may cause significant impacts on Trading Parties, Consumers or other stakeholders, the safety and security of the electricity or gas systems or cause any Party to be in breach of any relevant legal requirements. Therefore, this Modification is not subject to a request for Urgent treatment.

#### **Next steps**

This P379 IWA will be presented to the BSC Panel at its meeting on 10 January 2019. A Workgroup will then be convened to develop the solution to this Modification Proposal, with its first meeting scheduled to commence week commencing (W/C) 25 February 2019, subject to the BSC Panel's agreement to progress P379 into the Assessment Procedure.

#### Workgroup membership

The following expertise and knowledge should be sought for participation in the Workgroups to develop the solution to this Modification Proposal, to ensure that the solution delivers the intended benefits to market participants:

- SVA Process;
- Existing metering arrangements;
- Party Agent functions;
- Electricity Supplier functions; and
- New electricity supply business models (community energy, peer to peer trading, bundled products, storage sharing).

#### **Reference Documents**

ELEXON's white paper published on 16 April 2018 has been used as the basis for this Modification Proposal:

ELEXON White Paper: Enabling customers to buy power from multiple providers



What is the Self-Governance Criteria? A Modification that, if implemented:

(a) 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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## Timetable

The table below outlines the proposed progression approach for P379, resulting in the Assessment Report being presented to the BSC Panel at its meeting on 12 September 2019. Once the BSC Panel has provided its initial views, the Report Phase consultation will follow, before the BSC Panel is invited to provide its final views. As it is not proposed that P379 be treated as a Self-Governance Modification, the Final Modification Report (FMR) will be submitted to Ofgem as the Authority on 16 October 2019, with an expected decision by approximately 20 November 2019.

At this time we do not believe an industry impact assessment is required. If needed, it can be included in the Assessment Consultation or issued during the Assessment Procedure.

The proposed Implementation Date will be devised during the Assessment Procedure as outlined in Section 2 of this paper.

Proposed Progression Timetable for P379	
Event	Date
Present Initial Written Assessment to Panel	10 January 2019
Workgroup Meeting	W/C 25 February 2019
Workgroup Meeting	W/C 1 April 2019
Workgroup Meeting	W/C 29 April 2019
Workgroup Meeting	W/C 10 June 2019
Assessment Procedure Consultation (15WDs)	1 July 2019 – 19 July 2019
Workgroup Meeting	W/C 29 July 2019
Present Assessment Report to Panel	12 September 2019
Report Phase Consultation (10WDs)	16 September 2019 – 27 September 2019
Present Draft Modification Report to Panel	10 October 2019
Issue Final Modification Report to Authority	16 October 2019

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## 5 Likely Impacts

Impact on BSC Parties ar	nd Party Agents	
Party/Party Agent	Potential Impact	
Suppliers	Changes will be required to implement the solution to this	
VLPs	Modification. The full impacts will become clearer once the solution has been developed by the Proposer and Workgroup	
Generators	during the Assessment Procedure. However, it is anticipated	
DSOs	that there will be both system and document impacts on the	
Parties that wish to participate in the CNA	majority of Parties/Party Agents listed as being impacted from the solution to this Modification Proposal.	
role	Market participants will have the opportunity to fully assess impacts and costs as part of the Assessment Procedure Consultation.	

Impact on National Grid as the Electricity System Operator

The impacts on the Transmission Company from the solution to this Modification Proposal will be assessed during the Assessment Procedure. The Transmission Company will be invited to attend the Modification Workgroup meetings and perform an impact assessment during the Assessment Procedure.

#### Impact on BSCCo

The impacts on ELEXON from the solution to this Modification Proposal will be assessed during the Assessment Procedure. Impacts on ELEXON will relate to the development and implementation of the solution.

Impact on BSC Systems and processes	
BSC System/Process	Potential Impact
Balancing Mechanism Reporting Service (BMRS)	Potential impact on these BSC systems and processes, depending on the solution
ELEXON Portal	developed by the P379 Proposer and Workgroup, and subject to impact
Estimated Annual Consumption (EAC)/Annualised Advance (AA)	assessment.
Performance Assurance Reporting and Monitoring System (PARMS)	
Technical Assurance Agent Monitoring Tool (TAAMT)	

Impact on BSC Agent/service provider contr	ractual arrangements
BSC Agent/service provider contract	Potential Impact
Central Registration Agent (CRA)	Potential impact on these BSC Agents,
Funds Administration Agent (FAA)	depending on the solution developed by the

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Impact on BSC Agent/service provider contr	ractual arrangements
BSC Agent/service provider contract	Potential Impact
Settlement Administration Agent (SAA)	P379 Proposer and Workgroup, and subject
Supplier Volume Allocation Agent (SVAA)	to impact assessment.

Impact on Code	
Code Section	Potential Impact
A 'Parties and Participation'	Changes may be required to deliver the solution to this Modification Proposal, which will be determined through the Assessment Procedure.
D 'BSC Cost Recovery and Participation Charges'	
E 'BSC Agents'	
H 'General'	
J 'Party Agents and Qualification Under the Code'	
K 'Classification and Registration of Metering Systems and BM Units'	
L 'Metering'	
O 'Communications Under the Code'	-
Q 'Balancing Mechanism Activities'	
S 'Supplier Volume Allocation'	
S 'Annex S-1 'Performance Levels and Supplier Charges'	
S 'Annex S-2 'Supplier Volume Allocation Rules'	
T 'Settlement and Trading Charges'	-
U 'Provisions Relating to Settlement'	-
V 'Reporting'	-
W 'Trading Disputes'	
X 'Definitions and Interpretation'	
X 'Annex X-1 'General Glossary'	
X 'Annex X-2 'Technical Glossary'	
Z 'Performance Assurance'	]

Impact on Code Subsidiary Documents		
CSD	Potential Impact	
BSCP11 'Trading Disputes'	The impacts on these CSDs depend on the	
BSCP27 'Technical Assurance of Half Hourly Metering Systems for Settlement Purposes'	solution that is developed by the P379 Proposer and Workgroup. Therefore, this list of impacted CSDs is subject to change	

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Impact on Code Subsidiary Documents		
CSD	Potential Impact	
BSCP501 'Supplier Meter Registration Service'	and is intended only as an indication of the potential impacts arising from this	
BSCP502 'Half Hourly Data Collection for SVA Metering systems Registered in SMRS'	Modification Proposal. The Workgroup will determine which, if any, of these needs to	
BSCP503 'Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS'	be developed during the Assessment Procedure, and which can be developed as part of the implementation activities.	
BSCP504 'Non Half Hourly Data collection for SVA Metering Systems Registered in SMRS'	part of the implementation activities.	
BSCP505 'Non Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS'		
BSCP507 'Supplier Volume Allocation Standing Data Changes'		
BSCP508 'Supplier Volume Allocation Agent'		
BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'		
BSCP516 'Allocation of Profile Classes and SSC's for Non Half Hourly SVA Metering Systems Registered in SMRS'		
BSCP533 'PARMS Data Provision, Reporting and Publication of Peer Comparison Data'		
BSCP534 'PARMS Techniques'		
BSCP535 'Technical Assurance'		
BSCP536 'Supplier Charges'		
BSCP537 'Qualification Process for SVA Parties, SVA Party Agents and CVA Meter Operators'		

Impact on other Configurable Items		
Configurable Item	Potential Impact	
Impacted Configurable Items	To be determined through the Assessment Procedure once the Workgroup has developed the solution to this Modification.	

Impact on Core Industry Documents and other documents		286/04
Document	Potential Impact	P379 Initial Written Asses
Connection and Use of System Code	Changes may be required to deliver the solution to this Modification Proposal, which will be determined through the	8 January 2019
System code		Version 1.0

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Impact on Core Industry Documents and other documents		
Document	Potential Impact	
Distribution Connection Use of System Agreement	Assessment Procedure. ELEXON will ensure that cross-Code working is initiated if required during the development of the solution.	
Grid Code		
Master Registration Agreement		

Impact on a Significant Code Review (SCR) or other significant industry change projects

In the view of both ELEXON and the P379 Proposer, this Modification does not impact any ongoing SCR.

The SCR exemption request was submitted to Ofgem on 3 January 2019, with a response requested either on or before the BSC Panel meeting at which this IWA will be presented on 10 January 2019.

#### Impact on Consumers

The Modification should enable new electricity products for consumers, enabling greater choice and better service. The Modification should also enable greater competition between Suppliers for their consumers, improving value for these consumers.

In summary it:

- allows earlier roll-out of dynamic tariffs and capture of value from changes in consumer behaviour, and for those benefits to be shared with the consumer;
- supports innovation and consumer choice through greater competition for new services; and
- provides opportunity of enhanced revenue streams to compensate for loss of FiTs to new micro-generation sites.

#### Impact on the Environment

This Modification would have the following positive environmental impacts:

- supports continued deployment of low-carbon generation and battery storage behind the Meter;
- creates opportunities for new flexibility services and their aggregation for the benefit of Suppliers and distributors, and.
- increased Distribution System resilience, enabling more installation of renewable generation at distribution level.

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## 6 Recommendations

We invite the Panel to:

- AGREE that P379 progresses to the Assessment Procedure;
- AGREE the proposed Assessment Procedure timetable;
- AGREE the proposed membership for the P379 Workgroup; and
- **AGREE** the Workgroup's Terms of Reference.

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## Acronyms

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

Acronym		
Acronym	Definition	
AA	Annualised Advance	
BEIS	Department for Business Energy and Industrial Strategy	
BM	Balancing Mechanism	
BMRS	Balancing Mechanism Reporting Service	
BSC	Balancing and Settlement Code	
BSCCo	Balancing and Settlement Code Company	
BSCP	Balancing and Settlement Code Procedure	
CNA	Customer Notification Agent	
CoP	Code of Practice	
CRA	Central Registration Agent	
CSD	Code Subsidiary Document	
CUSC	Connection and Use of System Code	
CVA	Central Volume Allocation	
DCUSA	Distribution Connection Use of System Agreement	
DSO	Distribution System Operator	
EAC	Estimated Annual Consumption	
ESO	Electricity System Operator	
EV	Electric Vehicle	
FAA	Funds Administration Agent	
FiT	Feed-in-Tariff	
FMR	Final Modification Report	
НН	Half Hourly	
HHDA	Half Hourly Data Aggregator	
HHDC	Half Hourly Data Collector	
IWA	Initial Written Assessment	
MOA	Meter Operator Agent	
MPAS	Meter Point Administration Service	
MRA	Master Registration Agreement	
NHH	Non Half Hourly	
PARMS	Performance Assurance Reporting and Monitoring System	
PAT	Performance Assurance Technique	

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Acronym	
Acronym	Definition
PC	Profile Class
SAA	Settlement Administration Agent
SCR	Significant Code Review
SVA	Supplier Volume Allocation
SVAA	Supplier Volume Allocation Agent
TAAMT	Technical Assurance Agent Management Tool
ToR	Terms of Reference
VLP	Virtual Lead Party
W/C	Week Commencing
WD	Working Day

## **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
9	BSC Modification P376	https://www.elexon.co.uk/mod- proposal/p376/
9	BSC Modification P375	https://www.elexon.co.uk/mod- proposal/p375/
12	ELEXON White Paper Multiple Suppliers	https://www.elexon.co.uk/wp- content/uploads/2018/04/ELEXON- White-Paper-Enabling-customers-to-buy- power-from-multiple-providers.pdf

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