P364 Business Requirements

These are the Business Requirements for P364. The requirements lay out everything that is required to deliver the Proposed Solution. For ease they are split into four distinct areas:

1. Requirements for the Content of BSC Section K3.1;
2. Requirements to create the Criteria to be met for BM Unit registration;
3. Requirements for the BM Unit exceptions from the criteria to be met for BM Unit registration;
4. Requirements for Control and governance measures to be included in BSC Section K3.1; and
5. Requirements and considerations for Drafting and implementation.

The Business requirements are used for the drafting proposed legal text change to the BSC and for drafting proposed redlining changes to Code Subsidiary Documents (CSDs) that will require changing in order to deliver the P364 proposed solution.

For each of the Business Requirements there is an explanation of the why these are required and the benefit that each will bring. This is intended to assist those tasked with implementing and/or drafting the requirements so that they may better understand the thought processes that created the requirement and what is trying to be achieved.

Prioritisation of Business Requirements and de-confliction

In order to assist those tasked with implementation and/or drafting of the Business Requirements we have used the MoSCoW technique. The MoSCoW technique is commonly used in drafting Business Requirements and helps in prioritising requirements:

- 'M' = Must have (no point having a solution without this);
- 'S' = Should have (if not delivered then a workaround must be in place);
- 'C' = Could have (nice to have); and
- 'W' = Won't have this time.

These are relative priorities for each requirement but are not in any way definitive. The implementers/drafters should deliver all of the requirements listed below. However, if a conflict is identified between requirements, then the MoSCoW identifier should be used.

If there a conflict is identified between requirements within the same MoSCoW prioritisation, then the implementer/reviewer should consider the section in which they are contained considering the list above.

If there is still conflict, then the implementer/drafter should consider the number of the requirement as effort has been given to ordering the requirements in as close to an order as possible but again, this is not definitive. If the implementer/drafter is unsure on how to proceed, they should seek guidance from the P364 Lead Analysts who may then seek further guidance from the Workgroup, proposer or Panel as required.

Assumptions

Prior to drafting the Business requirements we identified five assumptions and for which a particular requirement does not need to be identified. These are based on Workgroup discussion and wider BSC requirements. These assumptions should be considered alongside each of the requirements and are listed here to avoid repetition within individual Business Requirements.

Assumption 1
Any changes **MUST** not affect anything introduced by Government and Ofgem directions to the Code (known as Other Regulatory Decisions (ORDs))
Reasoning: There are several areas of BSC Section K that were introduced as ORDs. Changing these requires prior written consent of the Secretary of State. The areas introduced by ORDs fall outside of the scope of this Modification and do not require changing.
Benefit: This ensures that areas of the BSC are not amended where the Panel is not authorised to make changes.

Assumption 2
Configurations currently allowed in BSC Section K3.1.4 **MUST** still be permitted following implementation.
Reasoning: This Modification does not seek to remove anything that is already deemed to satisfy the requirements to be a single BM Unit and therefore anything that is permitted under current arrangements, should still be permitted under future arrangements.
Benefit: This will ensure continuity between the current BSC and the proposed changes and provide certainty to industry participants.

Assumption 3
Where changes are made to Section K3.1, any cross references elsewhere within the BSC **MUST** be updated.
Reasoning: This ensures that the remainder of the BSC remains accurate in terms of cross referencing and correct where referring to parts of the BSC amended by this Modification.
Benefit: In addition to maintaining the accuracy, legality and integrity of the BSC, this ensures that there is no confusion for BSC users created by errant cross-references.

Assumption 4

The draft legal text **SHOULD** be such that it does not contravene the requirements of the Grid Code. Ideally it **COULD** be drafted in such a way that it does not affect any other industry codes.

Reasoning: The Grid Code uses BM Units as well as the BSC and will be the one Code that may be impacted by this Modification. This Modification only seeks to amend the BSC and not any other industry Code. All effort **SHOULD** be made to avoid causing a consequential change to the Grid Code so far as possible but, if such change is required, then it can be proposed.

In considering this assumption the implementer/drafter **SHOULD** be mindful of the fact that any changes to the Grid Code are likely to delay the implementation of this Modification. If a change to the Grid Code becomes a dependency of implementing this Modification, and the Grid Code proposed Modification is subsequently rejected, it may have a knock-on effect to this Modification.

It is not anticipated that any other Code will be amended by this Modification however, in the unlikely event that they are impacted; it is likely that they will be minor and not impact the implementation of this proposed Modification.

Benefit: This will mitigate against the implementation of the proposed solution being delayed or affected by connected changes to other Codes. So far as possible, only the BSC should be impacted, which will allow the proposed Modification to be implemented as soon as practicably possible (subject to prioritisation for all BSC changes).

Assumption 5

Any reference to BM Units within these Business Requirements **SHOULD** be in the context of Section K3.1 unless otherwise specified.

Reasoning: There are several different types of BM Unit that the BSC refers to, each with their own meaning and purpose. For these Business Requirements, the implementer/drafter **SHOULD** only consider the BM Units to in BSC Section K3.1. However, there may be a need to refer to other types of BM Units, but these will be specifically referenced in the perceptive requirements.

Benefit: This will avoid confusion as to what type of BM Unit is being referred to and negates the need to be more explicit in individual Business Requirements.

Requirements for the Content of BSC Section K3.1

Requirement 1

The principles developed by the P363/4 Workgroup **MUST** be described as criteria to be met for the purposes of BM Unit Registration where BSC Section K3.3 and K5 do not apply. The BSC wording **MUST** require that when considering BM Unit configurations, applications should be considered against these requirements and/or the exemptions in K3.1.4 (see BR2).

Reasoning: BSC Section K3.1 has a set of conditions that a BM Unit **MUST** satisfy (BSC Section K3.1.2) and list of what is deemed to be a single BM Unit (BSC Section K3.1.4). However, the configuration of a BM Unit has to meet the list of single BM Units in K3.1.4. It has been identified that this list and conditions do not reflect changes in the industry and the list needs to be

updated and the conditions adapted. A BM Unit **SHOULD** be considered to be a single BM Unit if it either meets the conditions that a BM Unit must satisfy or is on the list of single BM Units.

Given that this will be fundamentally changing how BSC Section K3.1 is used by applicants and in making BM Unit registration determinations, it is essential that the Workgroup consult on the proposed changes prior to making their recommendation to the Panel at the end of the Assessment Procedure.

Benefit: Allowing a BM Unit to meet either a set of conditions or a set of specific BM Unit configurations means that the BSC does not need to be modified at a later time to allow for configurations of Plant and Apparatus that become more common in the future unless they do not meet the list of conditions.

Requirement 2

The revised BSC Section K3.1 **MUST** contain a list of what is deemed to be a single BM Units, as exceptions to the criteria (see BR1) in the way that BSC Section K3.1.4 currently does.

Reasoning: There are several types of BM Units that would not fit the general criteria. It would not be appropriate to have criteria that they fit but these are currently allowable and single BM Units and must continue to be allowable as single BM Units.

Benefit: This change should not make BM Units that are currently allowable, not allowable under a principle approach.

Requirement 3

The wording of BSC Section K3.1.2A and K3.1.8 **SHOULD** be retained pursuant to BSC Section F1.1. Note – the respective paragraph numbers may change as required.

Reasoning: BSC Section F requires prior written consent of the Secretary of State (SoS) to change these sections, other than minor modifications as consequence of a Modification proposal (e.g. paragraph numbering). This Modification does not require changes for Energy Intensive Industries (EII) Assets, Contracts for Difference (CFD) Assets or Capacity Market (CM) Assets, which these sections refer to.

Benefit: As this Modification does not require this wording to be changed, there is no benefit in seeking SoS approval and therefore makes the drafting of legal text simpler.

Requirement 4

The wording of BSC Section K3.1.4A, K3.1.4B, K3.1.4C, and K3.1.4D **SHOULD** be retained.

Reasoning: It was agreed by the Proposer and the Workgroup that Power Park Modules (PPMs) (which this text refers to) do not fit in with the other criteria for registering a BM Unit. The wording of BSC Section K3.1 for PPMs was designed specifically for PPMs (see Modifications

P237, P238 and P240) and exists to facilitate offshore generation and is out of the scope of this Modification.

Benefit: This ensures that the special circumstances for PPMs are retained and is consistent with the scope of this Modification (and not altered by the Modification).

Requirements to create the Criteria to be met for BM Unit registration

Requirement 5

A BM Unit **MUST** be attributable to only one Party, and **MUST** allow the following scenarios:

- The Import may be attributed to a different Party than the Export (in this scenario there would be a BM Unit for the Import and a separate BM Unit for the Export) subject to BR 10;
- Both the Import and Export may be attributable to the same Party in a single BM Unit;
- It **MUST** not be possible to split the import between two Parties, similarly for the Export; and
- The Import may be split between two BM Units for a single Party only so far as permitted in Requirement 10.

Reasoning:

Only one BSC Party should have the Import or Export attributed to them in relation to the Import BM Unit or Export BM Unit for a Plant and Apparatus. It **MUST** not be possible to split the Import between two Parties, similarly for the Export. This is a fundamental underlying principle of the BSC and should not be affected by this Modification.

Benefit: This maintains the integrity of Settlement by ensuring that the flow is only attributed to one Party per Settlement Day. This will not restrict any potential business models under consideration for new or existing Plant and Apparatus. Splitting Import and Export into separate BM Units is already permitted where the lead Party for each is different (see consultation for further detail).

Requirement 6

The Import and / or Export to a BM Unit **MUST** be capable of being accounted for in Settlement separate to any Import or Export not included in the BM Unit.

Reasoning: BM Units are the lowest unit that is used for CVA Settlement purposes. This requirement is reiterating that BM Units must still be capable of being used for Settlement purposes.

Benefit: This maintains the integrity of Settlement by ensuring correct volumes are allocated to Parties in Settlement.

Requirement 7
The Export from Plant and Apparatus **MUST** only be accounted for in one BM Unit per Settlement Day.
Reasoning: Most Plant and Apparatus would have a single connection to either the Transmission System or the Distribution System. Where there is a separate connection for auxiliary assets, the Plant and Apparatus must only be able to import, not export through that connection.
Benefit: By ensuring that the Export from a Plant and Apparatus is only accounted for in one BM Unit, double counting (or missing) of energy flow is avoided, thus ensuring the correct data is used for Settlement purposes.

Requirement 8
The Import to Plant and Apparatus **MUST** be measured by Metering Systems registered in accordance with BSC Section K2.
Reasoning: BSC Section K2 gives clear instructions as to how Import to Plant and Apparatus should be measured. This requirement ensures continuity with other parts of the BSC.
Benefit: By maintaining continuity with other parts of the BSC, Settlement integrity is maintained and ensures that it is clear that the requirements for registering a BM Unit do not supersede other obligations in BSC Section K2.

Requirement 9
The Export from Plant and Apparatus **MUST** be measured by Metering Systems registered in accordance with BSC Section K2.
Reasoning: BSC Section K2 gives clear instructions as to how Export from Plant and Apparatus should be measured. This requirement ensures continuity with other parts of the BSC.
Benefit: By maintaining continuity with other parts of the BSC, Settlement integrity is maintained and ensures that it is clear that the requirements for registering a BM Unit do not supersede other obligations in BSC Section K2.

Requirement 10
The Import to Plant and Apparatus **COULD** be capable of being measured by Metering Systems registered in CMRS and SMRS at an SVA connection of less than or equal to [415V/1kV[1]] (pursuant to BSC Section K2/K3.3 – draft legal text **COULD** make cross reference) but non-zero

[1] Exact value to be determined by Consultation.

data **MUST** only ever be passed to the SAA by either the SVA or the CVA metering systems or neither Metering System at any given moment.

There MUST be measures in place to prevent instantaneous through flow from the CVA registered connection to the SVA registered connection.

Reasoning: Plant and Apparatus may be connected to the Transmission System, so the Import is accounted for in CVA. However, there may be a backup Import from the Distribution System. The back-up supply would be accounted for in SVA. Similarly for Distribution connected assets registered in CVA with a back-up supply connected at a separate point on the Distribution System.

Benefit: By ensuring that the Import is only measured as non-zero data in one BM Unit at a given moment, double counting of energy flow is avoided, thus ensuring the correct data is used for Settlement purposes.

Requirement 11

The Exports from and/or Imports to a Plant and/or Apparatus in a BM Unit **MUST** be controlled independently of the Exports from or Imports to the Plant or Apparatus which are also associated with another BM Unit.

The wording of BSC Section K3.1.2(b) **SHOULD** be retained as far as possible. Changes to the wording of K3.3.9 **MUST** be considered as an alternative to keeping teleswitching requirements in K3.1 so long as they reflect current BSC Section 3.1.2(b)'s intent with regards to teleswitching.

Reasoning: This ensures that BM Units can be controlled independently of each other as per BSC Section K3.1.2. It is essential for NGET that they have the ability to issue instructions to individual BM Units and these instructions do not have a knock on effect on other BM Units.

Teleswitching still exists, but could be covered in 3.3.9 as it is more relevant to Supplier Volume Allocation (SVA) Metering Systems

Benefit: This ensures consistency with current arrangements as well as ensuring that the unique circumstances associated with teleswitching are still allowed for but gives scope when drafting legal text.

This allows National Grid to continue to balance the systems effectively and allows the BSC to deliver Applicable BSC Objective (b) - The efficient, economic and co-ordinated operation of the National Electricity Transmission System

Requirement 12

The aggregation of independently controllable Plant and Apparatus up to the size of a [Small Power Station[2]] **MUST** be allowable. The aggregation of independently controllable Plant and Apparatus greater than the size of a Small Power Station **MUST NOT** be allowable.

[2] Small Power Station could be replaced by 50MW or License exemptible following consultation

Reasoning: One of the configurations of Plant and Apparatus that this Modification is looking to make a single BM Unit, is where a number of small generating units are joined to make a larger plant. However, from a controllability point of view, National Grid would only want this to be up to the size of a [Small Power Plant].

Benefit: This would allow future sets of small generating units to be considered to be a standard BM Unit, as opposed to having to apply to the ISG each time.

Requirements to create the Exceptions to the Criteria to be met for BM Unit registration

Requirement 13

The BSC MUST contain a list of Exceptions in to the Criteria which would also be considered to be single BM Units as follows (using the current K3.1.4 plus additions):

(a) any CCGT Module or Power Park Module for whose Exports the Metering System(s) is or are registered in CMRS;

(b) the Plant and Apparatus which comprises part of, and which Imports electricity through the station transformer(s) of, a Generating Plant, where the Metering System(s) for such Imports is or are registered in CMRS;

(c) premises (of a Customer supplied by a Party) which are directly connected to the Transmission System, provided that such premises are so connected at one Boundary Point only;

(d) an Interconnector BM Unit, in accordance with paragraph 5;

(e) a Base BM Unit or an Additional BM Unit, in accordance with paragraph 3.3;

(f) any configuration of Plant and Apparatus set out in Table A in Annex I-2;

(g) any two or more Offshore Power Park Modules (for whose Exports the Metering System(s) is or are registered in CMRS), where the responsible Party wishes to combine these as a single BM Unit and the Transmission Company in its absolute discretion determines that such a configuration is suitable to constitute a single BM Unit (a "Combined Offshore BM Unit");

(h) An offshore PPM plus Import/Export assets related to that PPM at separate Transmission System Boundary Point(s); and

(i) A Combined Offshore BM Unit plus Import/Export assets related to that Combined Offshore BM Unit at separate Transmission System Boundary Point(s)

Reasoning: There are currently Exceptions to the criteria which are considered to be single BM Units. It is not possible to expand the criteria so that each of these exceptions meet the criteria without combinations of Plant and Apparatus that National Grid would not want to see as a single BM Unit meeting the Criteria. Therefore these exceptions need to be documented in the BSC.

Benefit: The change should not prevent configurations of Plant and Apparatus that were previously felt to be single BM Units to no longer be single BM Units. Adding the list of exceptions prevents this.

Requirements for Control and governance measures to be included in BSC Section K3.1

Requirement 14
It **MUST** be clear that any changes in the configuration of Plant and Apparatus in a BM Unit are notified to the CRA. Such changes **MUST** mean that the BM Unit continues to meet the criteria for a BM Unit. This **SHOULD** be a new section in BSCP15. There **SHOULD** be a reference to BSCP15 in the BSC in respect of notifying changes.
Reasoning: This obligation already exists, but is not clear. Changes in configuration to the Plant and Apparatus may result in the associated BM Unit no longer meeting the requirements to be registered as a BM Unit. The risk is that there could be a knock on affect to Balancing and/or Settlement (or National Grid) in some way if the Plant and Apparatus associated with that BM Unit is not operated in the manner expected, or the flow of energy accounted for correctly.
Benefit: Making it a clear obligation to notify changes, ensures that risks to grid operation, Balancing and/or Settlement are mitigated. Ensuring BM Units remain suitable for use in Balancing and Settlement maintains the integrity of Settlement and NGET are able to operate the Transmission System efficiently.

Requirement 15
ELEXON **MUST** share all applications for BM Unit registration for Plant and / or Apparatus, for whose Exports and/ or Imports a Party is responsible, measured by CVA Metering Systems with NGET, unless NGET requests not to see a particular set of applications as agreed between NGET and ELEXON.
Reasoning: Parties wishing to participate in the Balancing Mechanism have to register a BM Unit with National Grid as well as one with ELEXON. The National Grid BM Unit ID needs to be included on the ELEXON BSCP15/4.1 form and the Effective From Dates must align to prevent system issues. This will allow ELEXON and NGET to ensure that their respective processes align, as well as giving NGET the opportunity to express any concerns they may have with the BM Unit registration (e.g. unachievable date from their point of view). This is already in BSCP15 so the current wording should be retained as far as applicable.
Benefit: This will ensure continuity between ELEXON and NGET and in turn provide certainty to applicants that the BM Unit registration process is coordinated from both a Settlement and Balancing perspective

Requirement 16
There **MUST** be a clear delineation in responsibilities for approving BM Unit registration applications. This may be captured in either the BSC or associated CSD.
Reasoning: This will ensure that there is no confusion between who has responsibility for approving registration.

Benefit: This will give certainty to the applicant as to who they should communicate with to clear up any issues etc.

Requirement 17
Application forms in CSDs **MUST** reflect the revised application process. BSCP15/4.1 **SHOULD** be retained as the BM Unit application form, but its content reviewed. in completing BSCP15/4.1 the applicant should be required to identify: • Import/Export Assets as per BR13(h) and (i); • Interconnection arrangements between Transmission and/or Distribution systems in anyway; and • Interlocking arrangements to prevent instantaneous through flow of energy between Transmission and/or Distribution Systems (see BR10).
Reasoning: Applicants having to use out dated forms for BM Unit registration may lead to confusion and essential information being missed. including the items listed above will assist elexon and NGET in assessing applications
Benefit: This will lead to more efficiencies in the BM Unit registration process, which is part of the issue identified by this Modification, and as such have a knock-on effect for applicants.

Requirement 18
There **MUST** be a process whereby rejected applications for BM Unit registration can be reviewed. The review body **MUST** be the Panel.
Reasoning: This is accepted good governance and ensures that there is a route where by applicants can object to a determination to reject a BM Unit application
Benefit: This ensures that there is a backstop process whereby applicants are able to challenge decisions if they believe that a mistake was made in making a determination

Requirement 19
A process for Applicants to apply for a BM Unit configuration not covered by 3.1.2 or 3.1.4, such as currently in K3.1.5 and 3.1.6 **MUST** be retained but a BM Unit would only need to use this process if it didn't meet 3.1.2 or 3.1.4 (currently the BM Unit has to meet K3.1.4).
Reasoning: This is accepted good governance and ensures that there is a route where by applicants can object apply for something outside of what is currently envisaged by the BSC.
Benefit: This allows for innovation and configurations not currently envisaged.

Requirement 20
If there is uncertainty over whether applications meet the requirements for BM Unit registration, there **MUST** be a process whereby the application can be considered by the appropriate body. The considering body **MUST** be the Panel.
Reasoning: This allows for difficult decisions to be referred to a higher authority. An example of where this may be if such a decision could be deemed to be setting a precedent.
Benefit: Ensures good governance practices are in place and provides assurance that difficult decisions will not be taken by those without the authority.

Requirement 21
The BSC **MUST** state who may refer an application for review or consideration. The wording of BSC Section K3.1.6(a) **COULD** be used.
Reasoning: This supports requirement 28 and maintains continuity with current procedures.
Benefit: Ensures good governance practices are in place and provides assurance that difficult decisions will not be taken by those without the authority.

Requirement 22
The BSC **MUST** state what shall be determined by the Panel (or other pursuant to Requirements 20 and 21) when reviewing or considering an application for BM Unit registration. The wording of BSC Section K3.1.6(b) **COULD** be used.
Reasoning: This will make it clear what should be considered when making a determination and provides the applicant with certainty on how their application will be considered when being reviewed pursuant to Requirements 20 and 21.
Benefit: Ensures good governance and ensures that current practices are maintained.

Requirement 23
Following the review or consideration of the application for BM Unit registration, if it is determined that the application should not be approved, then it **COULD** be determined what changes to the application are required in order to meet the requirements for BM Unit registration and approve this revised application. In doing so, NGET's views **MUST** be considered. The wording of BSC Section K3.1.6(c) **SHOULD** be used as a basis for the draft legal text.
Reasoning: This gives the option to recommend changes to configurations of Plant and Apparatus in a BM Unit whereby such changes will result in the application likely being approved.

Benefit: This will assist applicants with the registration process and, where applicants are required to change configuration of the Plant and Apparatus in the BM Unit, they will have some certainty over whether or not the changes will result in approval for registration.

Requirement 24
Determinations following review or consideration **SHOULD** be final and binding. BSC Section K3.1.6(d) **SHOULD** be used as a basis for the draft legal text.
Reasoning: This avoids applicants requesting repeated reviews or considerations where there are no changes in circumstances in the hope that a different determination will be made.
Benefit: Ensures efficient management of the BSC as well as maintaining consistency with current practices.

Requirement 25
Any determinations made pursuant to Requirements 20 and 21 **MUST** be recorded and made available upon request. BSC Section K3.1.7 **SHOULD** be used as a basis for the draft legal text.
Reasoning: Maintaining a record of determinations is accepted good governance and practice
Benefit: This ensures transparency in the decision making process and consistency with current practice.

Requirement 26
There **MUST** be mechanism where-by applications for BM Unit registration received prior to the implementation of the Modification are considered under the requirements of the BSC at the time of application, even if approval is not given until after the implementation of this Modification.
Reasoning: Applicants should have confidence that the rules in force at the time of application are the rules under which their application will be considered.
Benefit: This will give applicants the certainty for how their application will be appraised during the implementation phase and following implementation.

Requirement 27
Any applications for BM Unit registration received on or after the date of implementation **MUST** be considered against the requirements of the BSC at the time of application.
Reasoning: Applicants should have confidence that the rules in force at the time of application are the rules under which their application will be considered.

Benefit: This will give applicants the certainty for how their application will be appraised during the implementation phase and following implementation and is complimentary to Requirement 28.

Requirement 28
There **MUST** be mechanism where-by applications for BM Unit registration approved prior to the implementation of the Modification remain subject to the requirements of the BSC at the time of application (unless this affected by any BSC Changes implemented following this Modification). However, should their configuration subsequently change, they should be considered under the requirements in place at the time of notification of the change pursuant to Requirement 14.
Reasoning: Applicants should have confidence that the rules in force at the time of application are the rules under which their application will be considered. The wording 'in accordance with the version of the BSC in force when the BM Unit was first registered' **COULD** be used, similar to the requirements for Metering Systems in relation to Codes of Practice. However, requiring any subsequent changes to be considered under the new rules means that there will not be a need to refer back to superseded versions of the Code that the determinant may not be familiar with.
Benefit: This will give applicants the certainty for how their application will be appraised during the implementation phase and following implementation and is complimentary to Requirements 26 and 27. Additionally, it will mean that any changed BM Units are in-line with newer BM Units in terms of their configuration, rather than historical units.

Requirements and considerations for Drafting and implementation

Requirement 29
Where changes are made to Section K3.1 that conflict with other parts of the BSC, the other part of the BSC **MUST** be updated to reflect changes to BSC Section K3.1. This **MUST** only apply where the part of the BSC being changed to reflect this Modification agrees with the current version of K3.1 but not the revised K3.1.
Reasoning: If other parts of the BSC need changing to deliver the Solution, it should be changed, but the solution should not force change on parts of the Code that do not deliver the Modification's solution (to the extent of the conflict). BSC Section K3.1 should take precedence for BM Units that are not covered by BSC Section K3.3 or BSC Section K5.
Benefit: This will ensure the integrity of the BSC by avoiding unnecessary change which could, in turn lead to confusion amongst BSC users.

Requirement 30
The revised BSC Section K3.1 **MUST** not supersede the requirements of BSC Section K3.3 and BSC Section K5. The draft legal text **COULD** reflect BSC Section K3.1.1.

Reasoning: Changing these parts of the BSC is outside of the scope of this Modification and has not been considered, beyond acknowledging that they should not change).
Benefit: This will ensure the integrity of the BSC by avoiding unnecessary change which could, in turn lead to confusion amongst BSC users.