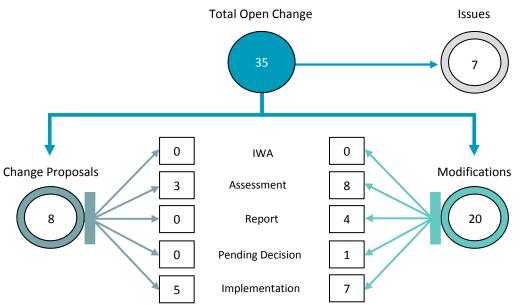
# 291/03 - BSC Change Report (June 2019)

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ELEXON

**Change News** 

## Summary of Open Change



This report provides key information on BSC Changes covering the period between the **May 2019** and the **June 2019** Panel meetings. Further information on BSC Changes can be found in the <u>Change Register</u> or on the <u>Change pages</u> of our website.

## This report contains updates on:

- P332, P364, P366, P371, P372, P373, P374,
   P375, P376, P377,
   P379, P380, P382,
   P383, P384, P385 and
   P386.
- CP1516, CP1517 and CP1518
- Issue 69, Issue 72, Issue 73, Issue 74, Issue 75, Issue 77, Issue 78, Issue 79 and Issue 80

# Decisions required by the Panel:

 P366, P372, P386, P387, P379, P374, P375, P372.

New Changes	P386, P387, CP1516, CP1517, CP1518		
Uncoming Concultations	P374 APC W/C 24 June – subject to Workgroup meeting		
Upcoming Consultations	P371 APC W/C 10 June – subject to Workgroup meeting		
	P366 DMR to Panel 13 June		
	P386 DMR to Panel 13 June		
Modification	P387 DMR to Panel 13 June		
progression updates	P379 Interim Assessment Report (IAR) to Panel		
	P374 Request for Extension – One Month		
	P372 Request for Approval of CSDs		
	P372 was approved under Self-Governance for implementation		
Approval, Rejections & Withdrawal	on 27 June 2019.		
Withurawai	P384 was approved under Self-Governance for implementation on 18 December 2019.		
Key: IWA: Initial Written Assessment, AC: Assessment Procedure Consultation, AR:			

Assessment Report, RC: Report Phase Consultation, DMR: Draft Modification Report

P332: Revisior	ns to the Supplier	Hub Principle		No Update
Date Raised:		28 January 2016	Proposer:	Smartest Energy
Target Implem	nentation Date:	Post 2020	Current Status:	Assessment Procedure – On Hold
Latest Update:	Hold The Panel approved a nine-month extension to the P332 Assessment Procedure at its meeting on 13 December 2018, returning with the Assessment Report to the September 2019 Panel meeting. This was on the basis that the preferred Target Operating Model (TOM) to be taken forward in Ofgem's Significant Code Review (SCR) on Electricity Settlement Reform represents a material change from the current baseline against which P332 would be assessed. The preferred TOM was identified by the Design Working Group (DWG), and included in its final report to Ofgem in January 2019 for Ofgem's approval. Further, Ofgem is also considering two areas of policy which will have an impact on P332: Consultation on supplier agent functions under market-wide settlement reform and Future of supply market arrangements – call for evidence (includes Supplier Hub). The Proposer is monitoring the development of the SCR and these policy areas to consider whether P332 should be withdrawn or work restarted.			th the Assessment ne basis that the d in Ofgem's <u>rm</u> represents a 2 would be forking Group 2019 for Ofgem's licy which will <u>ctions under</u> <u>arrangements –</u> pnitoring the
Next Event:	A further update 2019.	will be presented to the	ne Panel at its meeting	g in September
Issue:	principle and to Agents'. The `ap hub principle, ma within the BSC d	riginally created was d this end is silent on the pointment' of Agents b akes managing Agent p ifficult, resulting in a re ance against industry f ns.	e practice of 'Custome y Customers , outside performance and delive eduction in a Supplier	r appointed of the Supplier ery of obligations s ability to
Current Solution:	P332 proposes to	o amend the roles and g Supplier Agents to b	•	
History:				

P332 was raised by Smartest Energy Limited on 28 January 2016 and seeks to address issues associated with Customer's contracting directly with Supplier Agents.

The Panel, at its meeting on 14 September 2017, directed (in accordance with F2.6.10) the P332 Workgroup to pause work on the P332 solution. The Panel believed the Significant Code Review (SCR) on Half Hourly Settlement (HHS) could change the baseline against which P332 was being developed and assessed. Periodic checkpoints have been scheduled to check whether the Workgroup should start work again, P332 should continue to be on-hold or whether the proposer believes his defect has been addressed and P332 should therefore be withdrawn.

P332 was effectively placed on-hold, subject to the outcome of the <u>Significant Code Review (SCR)</u> on market-wide Half Hourly Settlement and Ofgem's policy decision on its <u>Supplier Agent</u> <u>functions</u> review.

The Panel approved a further seven-month extension to the Assessment Procedure at its meeting on 10 May 2018. The rationale for the extension was to allow enough time for the outcome of Ofgem's policy work to be known and for the Target Operating Models (TOMs), which are being developed as part of the SCR, to be further developed.

<u>P361</u> : Rev	Update				
Date Raised:		31 October 2017	Proposer:	Nord Pool Spot AS	
Target Implementation Date:		ТВС	Current Status:	With Authority (submitted 13 July 2018)	
Latest	Ofgem indica	ted at the Panel on 11	April 2019 that it was r	ninded to approve	
Update:	P361. As a re	sult Ofgem have aske	d ELEXON for an update	ed impact assessment,	
	as the propos	sed Implementation Da	ate of 28 February 2019	has now passed.	
Next Event:	Authority decision on whether to approve or reject P361.				
Issue:	The EU Third Package (Article 2 of Regulation 714/2009) expects Interconnectors				
	to be treated	as an extension of the	e Transmission System a	and not as Production	
	or Consumpti	ion. However, for the p	ourposes of calculating I	3SC Charges, BM Units	
	in Great Britain are currently treated as either a Production BM Unit (generation)				
	or a Consum	otion BM Unit (demand	I). The Proposer asserts	that the treatment of	
	Interconnector BM Units in the BSC Charges calculations is not aligned with the				
	EU Third Package.				
Current	This Modification Proposal seeks to exclude Interconnector Balancing Mechanism				
Solution:	(BM) Units from the Main Funding Share and SVA (Production) Funding Share BSC				
	Charges, in order to better facilitate the EU Third Package.				
History:	•				

The first P361 Workgroup meeting was held on Monday 8 January 2018. The Workgroup discussed the issue and the proposed solution. The Workgroup agreed to seek additional legal guidance on the defect. A second Workgroup meeting was held on 12 February 2018. The Workgroup discussed the legal guidance provided by ELEXON and agreed to seek additional external legal advice on the issues and EU law.

On 22 February 2018, Ofgem rejected the Proposer's request to treat P361 as an Urgent Modification Proposal. Ofgem did not believe the case for urgency had been clearly demonstrated.

A third Workgroup meeting was held on 13 March where external legal guidance was presented and discussed. Subsequently, the Proposer amended his solution to only exclude Interconnector BM Units Credit Energy Volumes from the Main Funding Share and SVA (Production) Funding Share calculations.

A fourth Workgroup meeting was held on 18 April 2018, where the service provider impact assessment of the Proposed solution was discussed and the Assessment Procedure Consultation

documentation finalised. The Assessment Procedure Consultation was issued on the 26 April 2018, with responses due by15 May 2018.

The fifth Workgroup was held on 24 May 2018, where the Assessment Consultation responses were discussed. The Workgroup raised an Alternative Modification, whereby the revised formula for the Main Funding Share and SVA (Production) Funding Share would be effective from the date of Authority decision. The formal implementation date would still remain as previously discussed, as the 28 February 2019.

The Assessment Report was presented to the Panel on 14 June 2018. The Panel initially recommended that both the Proposed and Alternative Modifications be rejected. The Report Phase Consultation was subsequently issued on 20 June 2018, with responses due by 3 July 2018.

The Draft Modification Report was presented to the Panel on 12 July 2018. The Panel recommended that both the Proposed and Alternative Modifications be rejected. The Final Modification Report was submitted to the Authority on 13 July 2018.

P361 is with the Authority for decision. Ofgem initially published an indicative decision date of 17 August 2018 but they have since been in contact notifying ELEXON that this decision date could not be met due to further legal analysis of the issue.

<u>P364</u> : Clarifyin	g requiremei	nts for registering an Units	d maintaining BM	Update
Date Raised:		7 December 2017	Proposer:	Green Frog Power
Target Implement	ation Date:	27 June 2019	Current Status:	Awaiting implementation
Latest Update:	Modification May 2019.	pproved P364 for imple on 11 April 2019. The	Self-Governance windo	ow expired on 7
Next Event:	P364 will be Release.	implemented on 27 Ju	ne 2019 as part of the	e June 2019 BSC
Issue:	<ul> <li>P364 will be implemented on 27 June 2019 as part of the June 2019 BSC Release.</li> <li>BSC Section K3.2.1 requires that BSC Parties register BM Units comprising the Plant and Apparatus for whose Exports and/or Imports they are responsible. BSC Section K3.1 sets out requirements that determine the configuration of BM Units. Taking account of ELEXON's review of Metering Dispensations and non-standard BMUs, we believe that the requirements of Section K3.1 may not best reflect the current and changing ways in which parties participate in the electricity industry.</li> <li>The issue is that the current non-standard BM Unit application process is inefficient and time-consuming for each site, with each application being assessed on its own merits.</li> <li>Particularly in the last two years, ELEXON has progressed an increasing number of non-standard BM Unit applications and as it stands this is projected to continue as the electricity industry undergoes considerable change brought about by new technologies, business models and</li> </ul>			ts they are determine the eview of Metering ne requirements nging ways in ration process is pplication being d an increasing rands this is ts considerable

Current Solution:	The BSC requires that an application for BM Unit registration must be one					
	of a series of specified configurations otherwise it is classed as non-					
	standard and must receive Panel (ISG) approval prior to registration. The					
	proposed solution will be that an application for BM Unit registration must					
	either be on the (expanded) list of approved configurations or meet the principles for what is considered a BM Unit. The non-standard process will					
	remain but, this will cut the application process in half for a growing					
	number of non-standard configurations thus saving time for the applicant,					
	ISG and ELEXON.					

#### History:

This Modification originated from an ELEXON review of Metering Dispensations and non-standard BM Units, with the findings and recommendations being presented to the Panel at its March 2017 meeting (Panel 264/08 Review of Metering Dispensations and Non-Standard BM Units).

The IWA was presented to the Panel in December 2017. Given the synergies between P363 and P364, it was decided that they should be progressed together with combined Workgroups, but will have separate consultations and reports.

The first Workgroup meeting for both Modifications was held on 5 February 2018. The second Workgroup meeting was held on Monday 5 March 2018. The third Workgroup was held on Tuesday 1 May 2018. It was planned to hold the third Workgroup early to mid-April, but this was not possible due to Workgroup member availability.

The solution the Workgroup developed was notably different from the original proposed solution (albeit rectifying the same defect) and it is intended that it will be the same solution for P364 (as it will address the P364 defect too).

The newly proposed solution to this Modification would introduce new opportunities to register standard BM Units that ELEXON, CDCA and CRA will need to bear in mind when considering applications to register BMUs. Furthermore, the development of this change should bear in mind technical constraints and implications under the Grid Code and Distribution Code – these may require changes if the BSC Proposal is considered appropriate, to ensure consistency across the codes.

The Workgroup met on 10 September 2018 and agreed the proposed solution and Business Requirements. Finalising the proposed solution has taken longer than expected as we are introducing a principles based approach to BM Unit registration alongside standard configurations. This is a new, more innovative, solution than the original solution and refining the solution has therefore taken longer than planned. This, coupled with long-term sickness of the lead analyst has meant that the Assessment Procedure is taking longer than expected.

The fourth Workgroup meeting was held on Monday 18 June 2018. Discussions focused on the draft legal text and business requirements. Following discussion, it was decided to put the Modification temporarily on hold. At the Panel's meeting in August, a three-month extension was granted for P363 and P364, meaning both Modifications will return to the Panel in November to present the Assessment Report. An extension was requested, as both Modifications were put on hold following requests from Workgroup members, due to a potential overlap with Issue 70 and 71. Workgroup members are of the opinion that there will now be no overlap and both Modifications can progress as planned.

The Workgroup met on 10 September 2018 and agreed the proposed solution and Business Requirements. Finalising the proposed solution took longer than anticipated due to the

introduction of a principles based approach to BM Unit registration alongside standard configurations. This is a new, more innovative, solution than the original solution and refining the solution has therefore taken longer than planned. Consequently, the Panel approved a two-month extension to the P363 Assessment Procedure at its meeting on 13 December 2018. The Assessment Phase Consultation was issued 8 – 28 Feb 19. The Assessment Report was presented on 14 March 2019 and the Report Phase consultation issued 19 March – 1 April 2019.

The Assessment Report was presented to the Panel on 14 March 2019. The Panel agreed to amalgamate P363 into P364, as one solution could address both the P363 and P364 issues. The Panel initially agreed with the Workgroup that P364 did better facilitate the Applicable BSC Objectives and so should be approved. The P364 Report Phase Consultation was held in March 2019. We received two responses, who both agreed with the initial Panel views.

The P364 draft Modification Report was presented to the Panel on 11 April 2019.

P366: Amending	P366: Amending Supplier Charge SP08a to exclude hard-to-read sites (HTR)				
Date Raised:		26 April 2018	Proposer:	Orsted	
Target Implementa	ition Date:	November 2019	Current Status:	Report Phase	
Latest Update:	The P366 Assessment Report was presented to the BSC Panel at its meeting on 9 May 2019. The Panel initially recommended that P366 should be rejected. The Report Phase consultation was issued 17 May – 3 June 2019.				
Next Event:		odification Report will I n on 13 June 2019. It			
Issue:	The Proposer defined HTR sites as small industrial sites that are unattended and located in remote areas. They have no telecom infrastructure or equivalency available for Advanced Meters or smart Meters. Despite making all practicable effort, it is often not possible for Suppliers to obtain Meter readings at these locations. Due to the nature of the Non Half Hourly performance requirements, small Suppliers are most susceptible to HTR related SP08a Supplier Charges. The Proposer believes they are unfairly disadvantaged and are less able to compete competitively for customers with HTR sites.				
Current Solution:	<ul> <li>The Proposed solution is that the SP08a Supplier Charge is set to £0.00 for all types of Metering System. As such, there is no need to declare a Metering System HTR and no need to inform any one or 'note' HTR data or 'flag' HTR data when communicating.</li> <li>This was consulted on as the Alternative Solution but, the Proposer adopted it as their solution post-consultation as they recognised, based on consultation feedback, that this would be a better solution to implement for industry as it was more proportionate in terms of costs and impacts in addressing the issue. The original proposed solution (subsequently</li> </ul>				

dropped) would have excluded HTR volumes from the SP08a Supplier
Charges calculation. The Supplier would instruct its Non Half Hourly Data
Aggregator (NHHDA) which Metering Systems to exclude. The flagged
Metering Systems would feed through to the Supplier Charges system
(PARMS) via the Supplier Volume Allocation Agent.

#### History:

The IWA was presented to the Panel on 10 May 2018. The Panel approved P366 to proceed to the Assessment Phase and the associated timetable. They agreed the Workgroup membership and Workgroup's Terms of Reference.

Ofgem did not determine whether P366 should be SCR exempt. Consequently, the Panel provided Ofgem with a SCR Suitability Assessment Report for P366. The Authority has not yet determined, nor are they obliged to determine, whether P366 is within scope of the three Significant Code Reviews (SCR) in the SCR Phase (as at the time P366 was raised). P366 will therefore progress in accordance with the approved Assessment Procedure timetable unless Ofgem determine that P366 should be a SCR subsumed Modification.

The first P366 Workgroup was held on 7 June 2018 to develop the proposed solution to such an extent to allow further impact assessment and analysis. Following analysis of potential System options to deliver the propose solution, it was agreed that IAs should be carried out to better inform the development of the solution.

The second P366 Workgroup was held on 7 August 2018. ELEXON prepared Business requirements for three potential System options discussed at the second workgroup as well as a potential alternative solution raised by a Workgroup member post WG2. Views on the alternative (setting SP08a Supplier Charge to £0.00) were sought from WG members by correspondence.

Impact Assessments were requested from CGI for three potential System changes as well as the alternate solution. A second potential alternative solution was raised in October and discussed with the proposer. The second alternative solution was to discount HTR data form the SP08a 97% target. As the system options to deliver this were almost identical to those of the proposed solution, it was decided not to ask for further CGI Impact assessments at this stage.

The third workgroup was held on 22 Nov 18 to discuss the merits of the Proposed solution, the first alternative and the second alternative. Each potential was evaluated against various criteria. The three System options were also evaluated against various criteria. The proposer wishes to remain with their original proposed solution (exclude HTR data from SP08a Supplier Charge calculation – see above). The Workgroup however, felt that the first Alternative (SP08a =  $\pounds$ 0.00 – see above) would better facilitate the Applicable BSC Objectives. The second alternative (removing HTR from 97% target) was not taken forward.

The Assessment Procedure Consultation was issued on 25 March 2019 for a 15 Working Day period, with responses received by 15 April 2019.

The final Workgroup took place on 23 April 2019 to review the consultation responses and make final recommendations to the BSC Panel regarding P366's progression and implementation. The majority of the Workgroup recommend that P366 is rejected.

<b><u>P371</u></b> : Inclusion of non-BM Fast Reserve actions into the Imbalance	Update
Price calculation	

Date Raised:		11 September 2018	Proposer:	UK Power Reserve
Target Implementation Date:		ТВС	Current Status:	Assessment Procedure
Latest Update:	ELEXON has undertaken Impact Assessments to assess the costs and implementation times of potential solutions.			the costs and
Next Event:	The Third P371 Workgroup will be held on 5 June 2019 for the Workgroup to agree its preferred solution and expects to issue its Assessment Procedure Consultation week commencing 10 June 2019. The Workgroup may request a one-month extension to allow for a 15 Working Day Assessment Consultation, otherwise it will be issued for a 10 WD consultation.			
Issue:	<ul> <li>P305 proposed a new methodology for pricing reserve into the calculation of the imbalance price exclusively for Settlement Periods in BM and Non-BM STOR. The aim was to capture the value that that capacity is providing to the system at times of margin tightness.</li> <li>At the time the new methodology was limited to STOR because STOR was considered "the main source of reserve", now the GB balancing system has undergone a range of changes, whereby Reserve products have been rationalised and harmonised. There is a lack of harmonised treatment between STOR and Fast Reserve and it is necessary to extend the application of the Reserve Scarcity Price (RSP) calculation methodology to Fast Reserve.</li> </ul>			Is in BM and Non-BM city is providing to because STOR was alancing system has ucts have been ised treatment extend the
	The Proposer believes that there is no reason for a different treatment of the two Reserve products and Fast Reserve should have been captured already within P305.			
Current Solution: History:	This Modification Proposal aims to address the lack of harmonised treatment between STOR and Fast Reserve and therefore extend the application of the Reserve Scarcity Price (RSP) calculation methodology to Fast Reserve. This will guarantee fair and harmonised treatment of both products and will capture the value provided by Fast Reserve to the system.			

#### History:

P371 was raised by UK Power Reserve on 11 September 2018. The Initial Written Assessment was presented to the Panel on 13 September 2018 and the Panel agreed to progress the Modification to the Assessment Procedure. The first industry Workgroup was held on 24 October 2018. 14 actions, including detailed analysis were identified for ELEXON and National Grid to jointly complete. Due to the level of analysis requested by the Workgroup in order that it can fully develop an appropriate solution, the Assessment Procedure has taken longer than initially anticipated. This resulted in the Panel extending the Assessment Procedure by four months at its February 2019 meeting. The second Workgroup for P371 was held on 13 March 2019 where the Workgroup agreed two possible solutions to P371.

The Workgroup have agreed the Business Requirements for two potential solutions, which ELEXON has impact assessed to inform final decisions made by the Workgroup.

P372: Speeding up		val process for the p on the BMRS	ublication of BSC	Update
Date Raised:	BSC Panel			
Target Implementa Date:	tion	27 June 2019 (June 2019 BSC Release)	Current Status:	Awaiting Implementation
Latest Update:	meeting, w	Aodification Report was ho approved the Modif hich closed on 30 May	ication subject to the	Self-Governance
Recommendation:	We invite the Panel to approve the new Code Subsidiary Document, assigning control to the ISG as a category 1 Configurable Item, and approve redlined changes to BSCP40 'Change Management' in order to deliver the intent of the P372 solution. These documents were consulted on as part of the P372 Assessment Procedure and Report Phase Consultations and no comments were received in relation to these documents.			
Next Event:	P372 will be implemented on 27 June 2019 as part of the June 2019 BSC Release.			
Issue:	The requirement to raise a Modification to make additions or changes to the data reported via BMRS is contributing to extended timescales for implementing these updates. The BSC is constructed in such a way that means the burden of governance can be reduced while maintaining appropriate oversight, by replacing the Modification process with the Change Proposal process. Furthermore, the scheduled delivery approach is overly restrictive for changes of this nature, which can result in longer implementation than necessary.			
Current Solution:	Section V should be streamlined by removing requirements and obligations around the BMRS, and reporting in general, and leaving only the necessary high level obligations. The detail removed from Section V would instead be captured within an appropriate CSD or in an alternative BSC Panel controlled document, since it is important that the list of data and reports that should be published is documented, along with associated details such as frequency and recipient. The Workgroup has additionally called for the formation of a new Panel committee to provide governance of inconsequential BMRS Change.			
History:				
P372 was raised by th	e BSC Panel	on 13 September 2018	3. The Initial Written	Assessment was

P372 was raised by the BSC Panel on 13 September 2018. The Initial Written Assessment was presented to the Panel on 13 September 2018 and the Panel agreed to progress the Modification to the Assessment Procedure. It was challenging and took longer than expected to get the quorate number of Workgroup Members. However, after additional engagement the necessary threshold was achieved.

The first industry Workgroup was held on 15 November 2018 where a solution was agreed. The second industry Workgroup was held on 18 December 2018 to gather Workgroup initial views on the proposal before issuing the Assessment Consultation in January. As previously reported, it took

over one month to find the minimum number of Workgroup Members (five). Consequently, an extension to the Assessment Procedure was required.

The Panel approved a two-month extension to the P372 Assessment Procedure at its meeting on 10 January 2019. The Assessment Consultation was issued for 15 Working Days to gather industry views on the proposed solution and supporting documents. We had planned to issue the Assessment Consultation in January 2019. However, we identified some further drafting and clarifications that are required before the consultation can be issued. ELEXON issued the Assessment Procedure Consultation for a 15 Working Day window on 27 February 2019.

Following the closure of the Assessment Procedure Consultation, no new arguments were put forward and the respondent was supportive of all the elements of the Workgroup's solution. At the final meeting of the Workgroup on 27 March 2019, the Workgroup confirmed that their views against the Applicable BSC Objectives had not changed and that no amendments to the proposed solution were required.

The Assessment Report was presented to the BSC Panel at its April 2019 meeting, where the Panel recommended that P372 be progressed to the Report Phase. The Report Phase Consultation was issued for a 10 working day period, due to close 5pm on 1 May 2019.

P374: Aligning	Update			
Date Raised:		5 November 2018	Proposer:	SSE
Target Implementa Date:	tion	5WD following Authority decision	Current Status:	Assessment Procedure
Latest Update:	The second Workgroup was held on 24 April 2019 to discuss solution options. During the course of the Workgroup it became clear that further work was required to amend the legal text and as such another meeting will be required to further develop the solution. The Workgroup are considering an Alternative solution.			
Next Event:	ELEXON are holding another Workgroup meeting on Friday 7 June 2019 to review proposed legal text for two options. However, the Workgroups were delayed due to quoracy issues. Further, delays have been experienced as the agreement of the solution has taken longer than anticipated. The Workgroup are therefore seeking a one month extension on P374.			
Recommendation	We invite the Panel to approve a one-month extension to the P374 Assessment Procedure, returning with the Assessment Report to the August 2019 Panel meeting.			
Issue:	Balancing ( process by EB GL chan	to ensure that the BSC Guideline (EB GL – Regu ensuring that BSC Mod ge process has comple provisions that meet t	ulation 2017/2195) de lifications are not imp ited and that BSC Der	erogation and change lemented until the rogations cannot be

	Specifically, P374 aims to reflect changes to the Code Governance arising from the application of the terms and conditions related to balancing from Articles 4, 5, 6, 10 and 18 of the EB GL.
Current Solution:	To amend BSC Derogation arrangement to make clear the parts of the BSC that form the terms and conditions related to balancing - which then cannot be subject to a BSC Derogation, in accordance with EB GL Articles. Additionally amending BSC change procedure to reflect that changes to certain parts of the BSC will have to go through a revised change process, in accordance with EB GL Articles.

#### **History:**

P374 was raised by SSE on 5 November 2018. The Initial Written Assessment was presented to the Panel on 8 November 2018. The Panel believed there was insufficient information to decide how to proceed (options included to proceed to the Definition, Assessment or Report phase). The Panel, therefore, deferred its decision and wrote to Ofgem to seek further information to enable it to make a decision at its next regular meeting on 13 December 2018. The Panel determined at its meeting on 13 December 2018 that P374 should be submitted to the Assessment Procedure. The first Workgroup was held on 20 February 2019. Discussions focused on the scope of the Modification, ELEXON took an action to draft an Alternative solution regarding how EBGL Article 62 impacts BSC Section H. The second Workgroup meeting was scheduled to take place on 12 March but was cancelled due to quoracy issues. We updated the Panel verbally on 14 March 2019 and achieved quoracy for the second Workgroup, held on 24 April 2019. ELEXON asked for an extension for P374 at the 11 April BSC Panel meeting, this was due to quoracy issues. The BSC Panel granted P374 with a two month extension until July 2019.

P375: Settlement	of Seconda	ry BM Units using me	etering behind the	Update	
	site Boundary Point				
Date Raised:	Date Raised:		Proposer:	Flexitricity	
Target Implementation Date:		April 2020 (subject to Assessment Procedure solution	Current Status:	Assessment Procedure	
		development)			
Latest Update:	development)The third Workgroup meeting was held on 16 May 2019. The purpose of the meeting was to review the draft Code of Practice for Asset Metering behind the Boundary Point and the work in progress Business Requirements. The Workgroup agreed that further consideration of the assurance regime, reporting and the types of behind the Boundary Point meters that should be included in the P375 solution are required. In particular, whether the types of measuring devices envisaged under P379 are included. Minor updates to the new Code of Practice were also identified.				
	It is clear that these elements will require at least three more Workgroup meetings, in addition to workgroup meetings to finalise and review the business requirements and legal text., before the Assessment Consultation is				

We invite the Panel to approve a six-month extension to the P375 Assessment Procedure, returning with the Assessment Report to the January 2020 Panel meeting.
The part Warkgroup is asheduled for 4 July 2010. The numbers of the part
The next Workgroup is scheduled for 4 July 2019. The purpose of the next meeting will be to review the outstanding areas and review the feedback from engagement with P379 Design Authority, Association of Decentralised Energy and Data Collectors, with respect to the scope of metering standards of the P375 'sub-meters'. In addition, to address any comments on the revised Asset Metering Code Of Practice and Business Requirements.
The BSC currently only allows metering at the defined Boundary Point to be used for Settlement purposes. However, with the future ability for consumers to participate in the BM and other alternative balancing products, which will be settled under the BSC framework, there is a need to allow Settlement from metering behind the Boundary Point at the asset which is delivering the Balancing Service. This Issue arose through the development of the Project TERRE arrangements through BSC Modification Proposal P344 'Project TERRE implementation into GB market arrangements', but may become relevant to other Balancing Services in the future. The need to allow Settlement from metering behind the Boundary Point is due to the desire to further reduce any potential (either perceived or due to operational reasons) barriers to entry to participate in balancing products.
P375 proposes to settle Secondary Balancing Mechanism (BM) Units (to be introduced by P344 'Project TERRE' (Trans European Replacement Reserves Exchange)) using metering equipment behind the defined Boundary Point for Balancing Services (known as 'behind the Meter'), rather than settling using Metering Equipment at the Boundary Point as per current BSC obligations. This will allow balancing-related services on site to be separated from imbalance-related activities, more accurately reflecting the balancing-energy volumes provided by the Balancing Service Provider (BSP).
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#### History:

The second Workgroup meeting was held on 18 March 2019 in conjunction with P376. Discussions focussed on metering standards and processes for secondary asset metering for use for balancing services and settlement, and the line loss methodology to be applied. The Workgroup also considered how the asset meters should be registered and it was agreed that SVAA would best fulfil the registration role, building on the TERRE solution. ELEXON took a number of actions to start to develop the business requirements, which will be used to conduct impact assessments.

The first Workgroup meeting, held jointly with P376, was held on 25 January 2019, where the Workgroup explored the issue by discussing possible effects on the Boundary Site and how links with National Grid would affect the eventual solution. The representative from Flexitricity acting as the Proposer for this Modification has changed, with another representative assuming the duties of the Proposer going forward.

P375 was raised by Flexitricity on 10 December 2018. The Initial Written Assessment was presented to the Panel on 13 December 2018 and was entered into the Assessment Procedure.

P375 and P376 are being progressed separately, but with the same Workgroup Members and being held on the same day, where appropriate.

	-	elining Methodology t ment of Applicable Ba	-	Update
Date Raised: Target Implementation Date:		11 December 2018 <b>Proposer:</b>	Proposer:	Enel Trade S.P.A.
		April 2020 (subject to Assessment Procedure solution development)	Current Status:	Assessment Phase
Latest Update:		orking with the Proposer s currently used in othe	•	tics of baseline
Next Event:		kgroup meeting will be baseline methodologies		
Issue:	ELEXON raised Issue 71 'Introduction of a baselining methodology as an alternative to Physical Notifications' on 15 June 2018. This Modification builds on the back of this Issue and formally raises a Modification Proposal relating to the same defect.			Modification builds on
	Modification Proposal P344 'Project TERRE implementation into GB market arrangements' seeks to align the Balancing and Settlement Code (BSC) with the European Balancing Project TERRE (Trans European Replacement Reserves Exchange) requirements. The solution developed by the P344 Workgroup allow customers (or independent aggregators acting on their behalf) to participate in TERRE (and the BM) independently of their electricity Supplier, by registering a 'Secondary BM Unit'.			Code (BSC) with the rement Reserves 44 Workgroup allows alf) to participate in
	The P344 solution is intended to facilitate participation in the BM and TERRE by a wider range of industry market participants, including customers and independent aggregators. However, in the P344 solution, the existing BM Settlement arrangements remain unchanged.			
Current Solution:	This Modification proposes to allow the Final Physical Notification which feeds into the Settlement of Trading Charges to be created via a Baselining Methodology. This Modification builds on the work of <u>Issue 71</u> .			
History:				
The Initial Writ entered into th		nt was presented to the Procedure.	Panel on 13 December	2018 and was
P376 was raise	ed by Enel Trad	le S.P.A. on 11 Decembe	er 2018.	
		, held jointly with P375, e by discussing possible		

with National Grid would affect the eventual solution.

The second Workgroup for P376 was held in conjunction with P375 on 18 March 2019 to begin the process of designing a solution and exploring assurance methods in order to protect the integrity of the eventual solution.

	<u>9:</u> Multiple Su	uppliers through Met	er Splitting	Update
Date Raised:	: 3 January 2019 Proposer:		New Anglia Energy	
<b>3</b>		Assessment Procedure		
Latest Update:	The P379 Draft Interim Report will issued for WG review on 30 May 2019. The report will then be submitted to the BSC Panel on 6 June 2019 for consideration at the June Panel Meeting. ELEXON is preparing for the next P379 meetings to be held in June 2019. The plan is to hold two meetings to discuss balance responsibility and Party Agent Role.			019 for consideration xt P379 meetings to be
Next Event:	An interim report will be presented to the Panel on 13 June 2019, as agreed as part of the approved P379 progression plan.			
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 do not 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.			
	arrangements markets and Party, the de	BSC Boundary Meter Po s do not adequately fac supply innovation, and fault Supplier, over a co	int. The Proposer outli ilitate the development effectively mean there onsumer's energy volur	nes that the existing t of local energy is a monopoly of one nes behind a

P379 was raised by New Anglia Energy on 3 January 2019 with the Initial Written Assessment presented to the BSC Panel at its meeting on 10 January 2019. The Panel determined that P379 should be submitted to the Assessment Procedure, with the Assessment Report to be presented to

the Panel at its meeting on 12 September 2019. The Panel requested an interim report on P379 at its June 2019 meeting.

The first P379 Workgroup meeting was held on 27 February 2019. The group considered the Terms of Reference and discussed views on the proposal. ELEXON took a number of actions arising from the meeting, including further areas for consideration.

Following the first Workgroup discussions ELEXON updated and issued two use cases for the Workgroups review prior to the next meeting.

The second P379 meeting was held on 3 April 2019. The purpose of the meeting was to:

- To clarify the P379 issue and scope;
- To discuss Workgroup views and feedback on use cases 1 (Electric Vehicle) and 2 (Exempt supply);and

For Ofgem to provide an overview on Network Access and Forward-Looking Charge Arrangements Significant Code Review.

The third P379 Workgroup was held on 18 April 2019. The purpose of the meeting was to finish discussions on the Exempt Supply Use Case. To provide more background information on Exempt Supply requirements Ofgem presented on the Exempt Supply framework and how this works within the current market. In addition ELEXON provided an overview of the existing options for non-licenced entities selling power over the Distribution Network Operator's (DNO) network and how the P379 solution could potentially work.

	endments to the BSC to reflect the United Kingdom's drawal from the European Union without a deal			No Update
Date Raised:		4 March 2019	Proposer:	National Grid ESO
Target Implementation16 WDs after PanelCurrent Status:RepDate:approval (after Self-Governance window expires)expiresCurrent Status:Rep		Report Phase		
Latest Update:	2019 and def exit from the in the mornin that as there may need am implemented Coupled with required in th	expires) The Panel reviewed the draft Modification Report at their meeting on 11 April 2019 and deferred making a decision until there is more certainty around the UK exit from the EU. The UK's exit day from the European Union was amended early in the morning of 11 April 2019 until 31 October 2019 at the latest. The Panel fel that as there is a reasonable possibility that the P382 proposed draft legal text may need amending before then e.g. as a result of other Modifications being implemented in the meantime or changes to legislation by the Government. Coupled with uncertainty over whether P382 will be required (N.B. P382 is only required in the event of a no-deal exit from the EU), the Panel determined that the most economic and efficient thing to do would be to defer their decision.		
Next Event:	to the BSC as	continue to monitor and s well as liaising with Ofg at the Panel need to ma	gem, BEIS and other Co	ode Administrators. If

	October 2019 Panel meeting, we will make such recommendation at the appropriate time.
	If changes are required to the proposed draft legal text for P382, we will share them with the Panel ahead of asking for their P382 decision and, if necessary (e.g. if there has been a material change in the text) may recommend that the Panel re-consults on the amended proposed draft legal text.
Issue:	The European Union Withdrawal Act (2018) will allow the BSC to remain operative immediately following exit day. However, there will be technical inaccuracies, which may lead to confusion for anyone not familiar with the relevant Brexit legislations, and will need updating as soon as possible.
	It should be noted that some revoked EU Legislation may not lead to the BSC being amended as it is more efficient for these parts of the BSC to remain 'dormant' until further details emerge of the UK's future relationship with the EU post-Brexit. An example would be parts of the Code dealing with P344 'Project TERRE' which won't become 'active' until December 2019.
Current Solution:	The BSC will be amended to reflect where EU regulations will not be retained in EU law and will make the BSC inoperable/confusing. If parts of the BSC are no longer applicable (as the associated EU regulation will not be retained), they may however, not necessarily need to be changed as allowing them to be dormant (i.e. not used but still there) may be more appropriate depending on the circumstances.
History:	1
D202	and an 4 March 2010 by National Crid ECO and the Initial Writton Accessment was

P382 was raised on 4 March 2019 by National Grid ESO and the Initial Written Assessment was presented to the Panel on 14 March 2019.

The Panel agreed, at its meeting on 14 March 2019, to progress P382 directly to the Report Phase and initially agreed that P382 should be approved. The Report Phase Consultation was issued on 18 March 2019 and closed on 29 March 2019. One response was received and agreed with the Panel's initial recommendations.

P383: Enhanced reporting of demand data to the NETSO to facilitate CUSC Modifications CMP280 and CMP281				Update
Date Raised:		6 March 2019	Proposer:	Innogy
Target Implementation Date:		February 2020	Current Status:	Assessment Procedure
Latest Update:	The first Workgroup was held on 29 April 2019. The Workgroup have identified a solution, agreed on the Applicable BSC objectives, and agreed that it should not be progressed as Self-Governance.			
Next Event:	ELEXON are progressing actions arising from the first Workgroup and scheduled the second meeting for 11 June 2019, which will likely be via teleconference and will discuss the outcomes of the Service Provider Impact Assessment. We are expecting to issue the Assessment Consultation in the in late June 2019.			

Issue:	Connection and Use of System Code (CUSC) Modification Proposal CMP281 and			
	ELEXON's Workgroup Alternative CUSC Modification to CMP280 both require			
	aggregated metered data from specific storage facilities' half-hourly (HH) Metering			
	Systems, should they be approved. However, the BSC does not currently specify			
	processes or rules for collecting and aggregating metered data from HH Metering			
	Systems that measure the Imports (and Exports) for specific storage facilities that			
	would be required for CMP280 and CMP281. Therefore, for the BSC to continue to			
	support the Transmission Company with its network charging, new BSC processes			
	will be required to enable the identification, aggregation and reporting of metered			
	data, and to enable the BSC Panel to establish appropriate assurance.			
Current	The Proposer suggests a Modification of the BSC and a certain number of its Code			
Solution:	Subsidiary Documents so that they describe processes that enable Imports and			
	Exports from Half Hourly (HH) Metering Systems for specific SVA registered			
	storage facilities to be aggregated and reported to the Transmission Company.			
History:				
P383 was rais	ed on 6 March 2019 by Innogy. The P383 IWA was presented to the BSC Panel on			
14 March 2019, who submitted it into the Assessment Procedure.				

<u>P384:</u> The pu	Update			
Date Raised:		6 March 2019	Proposer:	National Grid ESO
Target Imple Date:			Report Phase	
Latest Update:	The Panel Approved the P384 Draft Modification Report under Self- Governance a its meeting on 9 May 2019. P384 was subjected to a 15 Working Day appeal window, which closed on Thursday 30 May 2019.			
Next Event:	As no appeals were received, P384 will be implemented on 18 December 2019.			18 December 2019.
Issue:	The BSC will be non-compliant with the European Electricity Balancing Guideline (EB GL) Article 12.3 and 12.5 and the European Transparency Regulation (ETR) Article 17 unless changes to the BSC are made by 18 December 2019.			
Current Solution:	P384 will ensure the BSC and NETSO remains compliant with EB GL and ETR for publishing balancing related information.			
History:				

On 6 March 2019, National Grid ESO raised P384. ELEXON and National Grid ESO presented the IWA to the BSC Panel on 14 March 2019.

The Panel deferred its decision (in accordance with BSC Section F2.2.5) as it believed it had insufficient information available to enable it to decide how P384 should be progressed. ELEXON highlighted that delivering P384 at the same time as P344 'Project TERRE' would significantly increase the delivery risk profile. Further, ELEXON informed the Panel that since the IWA was submitted it had come to light the costs and lead times would change. A new impact assessment

would be needed to finalise the costs and lead times. The Panel requested further clarification on the costs, lead times and impacts of P384, the risks P384 may have on P344 delivery, and the interactions with National Grid ESO. ELEXON and National Grid ESO agreed to provide this information and present an update at the next Panel meeting on 11 April 2019.

ELEXON provided an update on the costs and impacts at the Panel meeting on 11 April 2019. The Panel determined that P384 should be submitted directly to the Report Phase for a 10 WD consultation, which was issued on the 15 April 2019, with responses due by 30 April 2019. The Panel initially recommended approval as a Self-Governance Modification.

<u>Р385:</u> Ітр	-	fficacy and efficiency efault provisions	of the Section H	Update
Date Raised:	3 April 2019 Proposer:			Centrica
Target Imple Date:	mplementation20 Working Days following Authority DecisionCurrent Status: ProcedureAssessment Procedure			
Latest Update:	meeting, due	beriencing difficulty confi to quoracy issues, ELE> I secured the necessary	ON have externally en	igaged prospective
Next Event:	The first Wor	kgroup for P385 has bee	en scheduled for 17 Ju	ne 2019.
Issue:	The frequency of Balancing and Settlement Code (BSC) Parties failing to pay their debts and defaulting on the BSC has increased in 2018. After a period of 10 years without a Supplier of Last Resort event, there was a single occurrence in 2016 followed by an unprecedented 7 events in 2018. This has resulted in greater exposure to unpaid Trading Charges which are then mutualised across other BSC Parties. The BSC Panel has the ability to take mitigating action and provide financial protection when an Event of Default is triggered, but the current arrangements in BSC Section H 'General' are overly complex and prolong the period before an Event of Default is declared.			
Current Solution:	P385 proposes amendments to the Default arrangements in BSC Section H 3 'Default' in order to increase visibility to industry of Parties at risk and to potentially allow for earlier remedial action by the BSC Panel.			
History:				
On 3 April 2019, Centrica raised P385. ELEXON presented the Initial Written Assessment at the 11 April BSC Panel meeting, where the Panel agreed to progress P385 to the Assessment Procedure.				

<b><u>P386</u></b> : Corrections and clarifications to the P344 'Project TERRE' legal text			Update
Date Raised:	7 May 2019	Proposer:	National Grid

Target Imple	mentation	7 November 2019	Current Status:	Report Phase	
Date:					
Latest	The Panel init	tially unanimously recon	nmended that P386 be	approved as a Self-	
Update:	Governance N	Modification at its meeting	ng on 9 May 2019. P38	6 was issued for a	
	Report Phase	consultation on 13 May	2019, with responses	due 3 June 2019.	
Next Event:	The P386 Draft Modification Report will be presented to the BSC Panel on 13 June 2019. Subject to approval as a Self-Governance Modification, the Self-Governance appeal window will be open from 13 June 2019 to 3 July 2019.				
Issue:	A number of manifest errors and opportunities to add clarity and make corrections have been identified within the P344 legal text. This modification will ensure that the legal text accurately reflects the P344 workgroup agreed solution detailed in the P344 Business Requirements.				
Current Solution:	Clarifications and corrections will be made to the P344 legal text to ensures clarity and alignment with the Workgroup intentions				
History:					
P386 was raise	d by National (	Grid on 7 May 2019.			

<b><u>P387:</u> Allowi</b>	ng email com	munications for the I process	<b>3SC Panel Elections</b>	Update		
Date Raised:		9 May 2019	Proposer:	BSC Panel		
Target Imple Date:	Target Implementation7 November 2019Current Status:Date:			Report Phase		
Latest Update:	Governance I	The Panel initially unanimously recommended that P387 be approved as a Self-Governance Modification at its meeting on 9 May 2019. P387 was sent out for an industry consultation on 13 May 2019, with responses due 3 June 2019.				
Next Event:	This Modification, along with the Industry Consultation responses, will be presented to the BSC Panel for decision on 13 June 2019. Subject to approval as a Self-Governance Modification, the Self-Governance appeal window will be open from 13 June 2019 to 3 July 2019.					
Issue:	The current Balancing and Settlement Code (BSC) Panel Elections process is in need of improvement. In regards to BSC Section H 'General' Paragraph 9.2.5, ELEXON is required to issue nomination and voting letters via post or fax which is a very time-consuming process and wastes a large amount of paper. Parties are required to submit nominations and votes via post or fax which is out of date with modern technology.					
Current Solution:		d solution is to amend B nel Election notices, non		- ·		

received via email by both ELEXON and voting Trading Parties during the BSC Panel Elections period.

Other forms of communication may be permissible as determined by the Panel from time to time.

#### History:

P387 was raised by the BSC Panel on 9 May 2019.

CP1516: New Interconnector Fuel Type Categories: ElecLink & Update IFA2					
Date Raised:	I:     7 March 2019     Proposer:     National Grid				
Target Imple Date:	mentation	ТВС	Current Status:	Assessment Procedure	
Latest Update:	CP1516 was published for consultation on 17 May 2019, with responses due by 5pm Thursday 13 June.				
Next Event:	Panel are req approve the c	e presented to the BSC uired to approve new Fu changes to the BSC subs ended via CP1516.	uel Types, it is efficient	for the Panel to also	
Issue:	The Balancing Mechanism Reporting Service (BMRS) is used for reporting operational data, relating to the Great British (GB) electricity Balancing and Settlement Code (BSC) arrangements. In part, it receives, stores and publishes data relating to the Interconnectors to Great Britain (GB). This information is available to BMRS users via several graphs, tables and xml/csv downloads, along with API, Data Push services and TIBCO services. Two new High-voltage Direct Current (HVDC) Interconnectors connecting the GB bidding zone to other bidding zones are currently under construction. The ElecLink and IFA2 interconnectors between GB and France are due for commissioning in November 2019 and June 2020 respectively.				
Current Solution:	The BSC arrangements require a separate 'Fuel Type Category' to be defined for each interconnector for reporting purposes on the BMRS. Therefore, it is necessary to make changes to the BMRS, to include the two new 'Fuel Type Categories', before ElecLink and IFA2 go live, in order to provide market participants data in a transparent manner.				
	The solution proposed for implementing CP1516 is an interim solution whereby aggregated data for Eleclink and IFA2 will be included within the existing IFA field (INTFR) on BMRS. Disaggregated data will be published on a new webpage on the BMRS, from which market participants will be able to pull data via an API, on the same timescales as currently available on the BMRS. The reason for this interim solution, which we expect to be in place until at least November 2020 is because P344 'Project TERRE implementation into GB market arrangements', P384 'The publication of European Electricity Balancing Guideline (EB GL) balancing data by BMRS' and CP1516 all require changes to BMRS for implementation in the November-December 2019 time period. The delivery of these changes over the same timeframe created constraints, that if not addressed would have impacted the delivery of P344.				
History:	<u> </u>				
CP1516 was raised on 7 March 2019 after being presented to the Imbalance Settlement Group					

(ISG) for information as a verbal update on 19 February 2019 (ISG214).

CP1517: Cha	<u>CP1517:</u> Changes to BSC Configurable Items for the TERRE Final Implementation Date				
Date Raised:		17 May 2019	Proposer:	ELEXON	
Target Imple Date:	Target ImplementationTBCCurrent Status:Date:			Assessment Procedure	
Latest Update:	CP1517 was i by 13 June 20	ssued for industry consu 019.	Iltation on 17 May 2019	9, with responses due	
Next Event:	The CP1517 Assessment Report will be presented to the Imbalance Settlement Group (ISG) on Tuesday 23 July 2019 and the Supplier Volume Allocation Group (SVG) on Tuesday 2 July 2019 for decision.				
Issue:	There are several BSC CIs that need to be amended to give effect to the full TERRE solution that could not be developed in time to become effective on 28 February 2019, or which should only become effective on the on the TERRE Final Implementation Date. These BSC CPs cannot be attributed to "P344" in the Amendment Record, as they are not covered by H2.5.1(c). As a result, a separate Change Proposal is required				
Current Solution:	Amend the relevant CSDs to enact the TERRE solution on the Final Implementation Date				
History:					
CP1517 was ra	CP1517 was raised by ELEXON on 17 May 2019.				

<u>СР1518:</u> Ног	<b><u>CP1518</u></b> : Housekeeping change to address errors in the approved changes to BSCP514 for CP1515			
Date Raised:		7 May 2019	Proposer:	ELEXON
Target Imple Date:	mentation	7 November 2019	Current Status:	Assessment Procedure
Latest Update:	CP1518 was raised by ELEXON on 7 May 2019.			
Next Event:	As a Housekeeping CP, CP1518 will be presented to the SVG on 4 June 2019 for a decision. If SVG approve, and no appeals are made, CP1518 will be implemented on 27 June 2019, as part of the June 2019 BSC Release.			
Issue:	Following approval of CP1515, minor errors were identified as part of ELEXON's quality checks prior to implementation, in the BSCP514 redlining. The approved redlined changes to BSCP514 contain the incorrect name for the D0312 Data Flow in six process steps (5.2.2.20, 5.3.5.7, 6.3.3.8, 6.3.4.6, 6.3.4.24 and 6.3.5.6). There were also three more small manifest errors that were identified.			

Current	Amend sections of BSCP514 to change the incorrect D0312 title, 'Notification of				
Solution:	Meter information to SMRS' to the correct D0312 title 'Notification of Meter information to MPAS'. As well as correct the three manifest errors in BSCP514.				
History:					
CP1518 was	raised by ELEXON on 7 May 2019.				

	Issue 69: Performance Assurance Framework Review					
Date Raised:	ate Raised:30 March 2017Proposer:ELEXON					
Latest Update:	May 2019. Th raise a Mod to second was t	come of the issue 69 Working group audit was presented to PAB on 30 19. There were two main outcomes, the first was that PAB determined to Mod to set SP01 to 0, and to go on a full review of Supplier Charges. The was that the PAF review recommendations would be folded into BAU s from now on.				
Next Event:	Issue 69 will now be focussing on qualification and re-qualification, as well as Supplier Charges, this will be happening at the end of June 2019.					
Issue	Supplier Charges, this will be happening at the end of June 2019. ELEXON and the Performance Assurance Board (PAB) are aware of opportunities to further enhance the application of the risk-based Performance Assurance Framework (PAF) envisaged in P207 'Introduction of a new governance regime to allow a risk based Performance Assurance Framework (PAF)' to utilise and reinforce its effectiveness to address the challenges of a changing industry. This Issue Group will explore the issues and identify possible solutions for each work stream: Smart Metering, PAF procedures, data provision and Performance Assurance Techniques.					

#### History:

The first work stream was Smart Metering, with two meetings held on 25 April 2017 and 24 May 2017 respectively. The interim Issue Report for Smart Metering was presented to the PAB in June 2017, and tabled at the BSC Panel in July 2017. ELEXON took a paper to the November 2017 PAB meeting that provided recommendations on mitigating the key smart risk areas identified. A high-risk area was identified in relation to the Supplier-Agent interface and as a result CP1500 'Amend the BSCP537 Appendices to add a requirement for Suppliers and MOAs to demonstrate the ability to send and receive Smart Meter Configuration details' was raised, seeking to include the D0367 data flow in the Qualification process.

The second work stream is on PAF procedures. This work stream will focus on a new design for the PAF, covering what is currently the Risk Evaluation Methodology (REM), Risk Evaluation Register (RER), Risk Operating Plan (ROP) and the reporting.

The first Workgroup on PAF procedures was held on 17 January 2018. In the meeting, ELEXON presented a proposed design to the group for review and comment. The second meeting was held on 10 April 2018 to align with work we are doing for the Performance Assurance Framework review. Additionally, ELEXON presented a related draft Modification Proposal ('Amendments to Section Z to better facilitate the production of the Risk Evaluation Methodology, Risk Evaluation Register and Risk Operating Plan') and associated draft redlined Legal text to the Workgroup in order to gain their endorsement toward its principles.

The third meeting for this work stream was held on 12 June 2018 where the Workgroup discussed a newly drafted version of the RER. At this meeting, as the Workgroup consisted of SVA experts only, they could not provide feedback on the CVA risks listed within the RER. Therefore, a dedicated session for CVA experts to provide feedback on the RER was held on 25 July 2018. The

fourth and final meeting for the PAF Procedures Work Stream will be held on 15 August 2018. At this meeting the ELEXON will present the final design of the PAF along with its component parts.

Modification P368 'Amendments to Section Z to better facilitate the production of the Risk Evaluation Methodology, Risk Evaluation Register and Risk Operating Plan' was approved by the BSC Panel at its meeting on 12 July 2018 and will be implemented in the November 2018 BSC Release. This Modification arose from work completed by the Issue 69 group relating to PAF procedures.

The last Issue Group for the PAF Procedures work stream was held on 15 August 2018, with subsequent teleconference meetings held on 30 and 31 August 2018. During these sessions, ELEXON presented the final design of the PAF along with its component parts, on which the Issue Group members provided guidance and comment.

The third work stream, the Review of the PATs, aimed to catalogue the current performance assurance techniques (PATs), identify limitations or areas for improvement (based on stakeholder feedback and further discussion with technique owners), and integrate those improvements into a set of new PATs.

The first working group for this work stream took place on 30 November 2018. The working group discussed the key ideas for change to the audit techniques, and identified some additional potential improvements

The final work stream aims to identify and test alternative methods of data provision that will place less burden on participants to provide data, and will help support more accurate risk appraisal.

The first working group for this work stream took place on 3 October 2018, with subsequent working groups scheduled for roughly every quarter.

ELEXON presented the latest version of the Risk Register to the Performance Assurance Board (PAB) at its meeting on 29 November 2018, requesting that the document be approved for public consultation. The PAB commented positively on the revisions made to the Register, including the introduction of a materiality ( $\pounds$ ) figure associated with each risk to measure its impact, and noted that the reduction in the number of distinct risks, whilst maintaining total coverage of all potential risk events, made the Register more accessible and easier to navigate. The first Issue 69 working group for the Performance Assurance Techniques work stream was held on 30 November 2018.Summary notes from the Workgroups were sent to members. Following the consultation period ending 21 December 2018, the PAB approved the new Risk Register on 31 January 2019.

The Performance Assurance Board (PAB) suggested engagement with the Issue 69 workgroup (in particular Suppliers) on Supplier Charges review.

The dates for workstreams on Supplier Charges review and BSC Audits as part of Issue 69 have been confirmed. Engagement with Issue 69 stakeholders for both the Performance Assurance Techniques Review and Data Provision workstreams is expected in spring 2019.

The workstreams for the Supplier Charges review and the BSC Audit was held on Tuesday 14 May and Wednesday 15 May 2019 respectively.

<b>Issue 72:</b> Ensuring measurement transformer assets installed by a Non-BSC Party are successfully Commissioned within BSC timescales						
Date Raised:	Date Raised:     11 September 2018     Proposer:     SSE Ltd					
Latest	The Issue 72	Report was tabled at th	e 9 May Panel meeting	. The Panel made no		
Update:	comments.					
Next Event:	This is the final update for Issue 72, as the Issue is now closed. A consequential CP 'Clarifying responsibility for Commissioning of measurement transformers that will be later adopted into that BSC Party's ownership' will be raised in July.					
Issue:	will be later adopted into that BSC Party's ownership' will be raised in July. Several issues have been identified in the Commissioning process where Measurement Transformers installed by a non-BSC Party are not owned by the Licensed Distribution System Operator (LDSO). This results in the Meter Operator Agent (MOA) being required to complete the full Commissioning testing, which may not be practical or possible in the case of high voltage (HV) and extra high voltage (EHV) connections.					

#### History:

Issue 72 was raised by SSE Ltd on 11 September 2018. The first Issue Group meeting was held on Tuesday 16 October 2018. The Issue Group identified a possible solution to the issue of measurement transformers installed by Independent Connection Providers (ICPs) and identified several actions to take in order to progress this.

The issue as it relates to Building Network Operators was deemed to be more complex and was considered as to be part of a wider industry problem. Several actions were identified to provide greater clarity of the scope of the problem.

ELEXON have liaised with Competition in Connections Code of Practice (CiCCoP) regarding a response to the BSC Panel's letter dated 28 August 2018. The CiCCoP Panel considered and discussed the matters that relate to Issue 72, the outcomes for which are captured in the minutes.

The second meeting of the Issue 72 group took place on 24 January 2019. The Issue group have identified several potential solutions to progress, including a clarification change to both CoP4 and the Competition in Connections Code of Practice (CiCCoP). The issue group has unanimously endorsed ELEXON to engage externally to initiate a cross-Code discussion related to challenges posed by working with Building Network Operators.

Following unanimous endorsement by the Issue 72 group, ELEXON engaged externally to initiate a cross-Code discussion related to challenges posed by working with Building Network Operators. This involved raising the work of Issue 72 with the CACoP as well as holding a joint BSC-MRA Workshop on License Exempt Networks on 1 March 2019.

The third meeting of the Issue 72 group took place on 2 April 2019. Meeting objectives were to review a draft Change Proposal to amend CoP4 that ELEXON had prepared. Additionally, the outcomes of ELEXON attendance at Competiton in Connections Code of Practice (CiCCoP) and the joint BSC-MRA Licence Exempt Network (LEN) workshop were also discussed and steps forward agreed.

ELEXON made amendments to the redlining for the draft Change Proposal following Issue Group Review, in order to take forward the recommendations of Issue 72.

Date Raised:		12 October 2018.	Proposer:	SSE Ltd	
Latest	ELEXON has	used data from Workgr	oup members to help d	lefine service level	
Update:	agreements for resolving faults and draft redlining to carry forward proposed changes .				
Next Event:	The next Workgroup for Issue 73 will be held on 13 June 2019, for the Workgroup to consider the proposed SLAs and process for involving Distributors in the fault resolution process.				
Issue:	not best place Licensed Dist Agent (MOA) complaint wit	veral issues have been identified in the fault resolution process where a MOA is t best placed to rectify faults on Measurement Transformers owned by the censed Distribution System Operator (LDSO). This results in the Meter Operator ent (MOA) being unable to resolve the fault in a timely manner to remain mplaint with the BSC. The notification process used in the faults process should so be amended to reflect the recommendations of the Fault Investigation			

Issue 73 was raised by SSE on 12 October 2018.

The first Workgroup was held on 22 November 2018 where amendments were proposed to the FIRG process.

The second Workgroup was held on 7 February 2019 to agree the CP that would carry forward FIRG recommendations, discuss potential SLAs and begin defining LDSO process.

	Issue 74: Increased utilisation of non-BM STOR						
Date Raised:	25 October 2018. <b>Proposer:</b> National Grid ESO						
Latest Update:		The Issue Report was tabled at the 9 May Panel meeting. The Panel did not have any comments.					
Next Event:	This is the fir	This is the final update for Issue 74, as the Issue is now closed.					
Issue:	The Electricity System Operator (ESO) has received feedback from stakeholders that increased utilisation of non-BM STOR is causing issues on service visibility by way of reduced visibility of non-BM STOR actions. This is compared to other actions taken in the market. This is making it harder for market Parties to react to signals in relation to non-BM STOR utilisation.						
	Stakeholders have also identified that impacts are seen in cash out. Low non-BM STOR prices mean they are often cheaper than some bids the ESO has accepted, so the actions become arbitraged (taken out of the imbalance price stack). This can have an impact on the imbalance price. There have been times when all accepted offers in a short market are arbitraged, leaving no prices with which to generate the imbalance price. Therefore the imbalance price methodology reverts to using the Market Index Price.						

The ESO requires the Issue group to look into defining potential solutions and
identifying if there is a firm need to address this Issue that would have a positive
market impact while taking into account the upcoming implementation of P354.

#### History:

Issue 74 was raised by National Grid ESO on 25th October 2018.

ELEXON are currently progressing actions and analysis arising from the first meeting and determining an appropriate time to hold a second Issue Group. The Issue Group unanimously agreed in the first meeting that visibility of non-BM STOR would improve parties abilities to make informed decisions on whether to Bid in to the stack for STOR services and that this data would provide clear visibility of when non- BM STOR was being utilised by ESO. National Grid has completed actions to enable next meeting to be scheduled for mid-April 2019. ELEXON have completed actions that came from the first meeting, and scheduled the second meeting for 15 April 2019.

The second meeting was held on 15 April, where the Workgroup reviewed the actions arising from the first meeting and agreed that no BSC change could be implemented in the timescales, but that ESO could develop an interim solution for transparency.

# **<u>Issue 75</u>**: Use of Internet Protocol (IP) address based communication methods for Central Volume Allocation (CVA) Metering Systems

Date Raised:	1:28 November 2018.Proposer:SSE				
Latest Update:	Following the initial response to the impact assessment (IA) we had some comments that required further clarification. This was received and relayed to the Issue Group in a final meeting on 23 May 2019.				
Next Event:	The Final Issue Report will be presented on the 13 June 2019 to the BSC Panel.				
Issue:	British Telecom (BT) has confirmed its intention to switch off the PSTN infrastructure by 2025. This is the currently used to Communicate with CVA Metering Systems. The Circuit Switch Data (CSD) capability over the GSM network (otherwise known as 2G), is also expected to become more and more unsupported over the coming years and to be switched off sometime between 2020 and 2025.				

#### History:

Issue 75 was raised by SSE on 28 November 2018. The first meeting of the Issue 75 Issue Group was held on 31 January 2019 at ELEXON's offices. Following the Issue Group meeting on 31 January 2019, we issued a Service Provider Impact Assessment (IA) in line with the proposed solution developed by the Issue Group. This solution looks to alter ELEXON's contract with the Central Data Collection Agency (CDCA) to permit the use of Internet Protocol (IP) to communicate with Meters in the Central Volume Allocation (CVA) Market.

Issue 77: Rev	view of fixed	charges under the BS	SC								
Date Raised:		29 March 2019	Proposer:	ELEXON							
Latest Update:		ting of the Issue 77 Gro ecommended that the r									
Next Event:	The Issue 77	he Issue 77 report will be tabled at the 13 June 2019 BSC Panel meeting.									
Issue:	in March 2018 Charges were Panel at its 3 an Issue grou BSC Specified The methodo many of the r there has bee The lack of an Charges with charges (for e charge) are re pay them. Inc	Charge rate for Addition B. Following this a series e presented to the BSC P 1 January 2019 meeting up to consider Specified I Charge rates are set ar logy for the structure of rates for Specified Charge en substantial change wi n evidence-based approxi- out cost drivers is incons- example the Notified Vol eviewed, determined and dustry views on the perce- s of Specified Charges wi industry appetite for charges	s of papers that investig anel ( <u>282/10</u> , <u>283/10</u> a ( <u>286B/01</u> ) recommend Charges without cost d and approved by Panel of charges was created in es without drivers unch thin the industry. Ach towards setting the sistent with the manner ume Charge and SVA N d communicated to the eived appropriateness ithout cost drivers will	gated Specified and <u>284/10</u> ).The BSC ded the formation of irivers. In an annual basis. In the year 2000, with hanged, even though e rates of Specified r in which other Metering System e Parties who have to and cost-							
History:											

Issue 77 was raised by ELEXON on 29 March 2019.

Issue 78: Me	asurement a	nd monitoring of Sett	lement performance	9					
Date Raised:		29 March 2019 <b>Proposer:</b> Opus Energy Limited							
Latest Update:	2019. ELEXOI modelling var investigated i various value increasing an combinations the PARMS ad	ting was exceptionally v N is analysing Supplier C ious options to assess p nclude, but are not limit s. Removing all Supplier d decreasing target leve of each of these option dministrator) in modellir 13 June 2019	charge data from variou otential material impact red to: Amending Supp Charges, removing so els to between 0% and s. We have asked for a	us sources and cts. Options being lier Charge rates to me Supplier Charges, 100% and ssistance from CGI (as					
Next Event:	The Issue Group discussed various options and ELEXON is carrying out analysis of each and will make recommendations to the Issue group in due course. It is intended to host the second Issue Group late June/early July 2019.								

CI	HANGE PROPOSALS - UPDATES & DECISIONS							
Issue:	The Proposer believes that impending industry-wide challenges around Settlement Performance will stem from Suppliers' two-tiered customer portfolios:							
	• Those with smart Meters and thus, in due course, Half-Hourly (HH) Settled; and							
	Those without, who will forever remain non-HH (NHH)							
	This Issue is already impacting a large number of Suppliers and that will increase with the smart Meter rollout and move to mandatory HH Settlement, as the remaining pot of non-smart and NHH customers will have a greater proportion of hard-to-read (HTR) sites.							
History:								
Issue 78	was raised by Opus Energy Limited on 29 March 2019.							

Date Raised:		15 April 2019	Proposer:	Utilita						
Latest Update:		An Issue Group meeting was held on 20 May 2019 whereby it was decided that no BSC change should be progressed in relation to the Issue at this time.								
Next Event:	The Final Issue Report will be presented on the 13 June 2019 to the BSC Panel.									
Issue:	smart Meterir causing both	Identified issue when CoS Gain/Loss occurs between certain Suppliers who have smart Metering (SMETS1) already installed. Utilita has identified an issue which is causing both Excessive & Negative advances being entered into Settlement. This is due to different processes being followed by Suppliers.								
History:										

	<u>Issue 80:</u> Increase in minimum data storage requirements within the relevant Metering CoPs										
Date Raised:		16 April 2019	16 April 2019 Proposer: As Op								
Latest Update:	Information i interested pa	The first Issue 80 meeting date has been set for 24 June 2019. A Request for Information inviting Meter Manufacturer, Party Agents, Parties and other Interested parties views of the proposed change will be issued prior to the meeting for group's consideration.									
Next Event:	is to discuss	The first Issue Group is scheduled for 24 June 2019. The purpose of the meeting is to discuss the issue raised, gather Workgroup views as well as consider potential solutions.									

Issue:         The minimum data storage requirements within the Half Hourly Metering Codes of Practice (CoPs) are regarded as very low and should be increased.								
History:								
Issue 80 was r	aised by AMO on 16 April 2019.							

## PROGRESS OF MODIFICATIONS – The below provides a summary of all open modifications. Full details can be found in the Change Register

Key	Initial Written	Assessment Procedure:	Report Phase:	WA: With Authority	AI: Awaiting	I: Implementation
	<u>Assessment:</u>	<b>AR:</b> Assessment Report <b>APC:</b> Assessment Procedure Consultation	RC: Report Phase Consultation DMR: Draft Modification Report FMR: Final Modification Report	Awaiting Decision	Implementation	

Mod	Title	Proposer	Date Raised	Urgent	Jun	Jul	Aug	Sep	Oct	Nov
P332	Revisions to the Supplier Hub Principle	Smartest Energy	28 Jan 16	No				AR		
P354	Use of ABSVD for non-BM Balancing Services at the metered (MPAN) level	ENGIE	11 Jan 17	No						
P364	Clarifying requirements for registering and maintaining BM Units	Green Frog Power	07 Dec 17	No	I					
P366	Changes to Supplier Charges on `hard-to-read' NHH sites	Orsted	26 Apr 18	No	DMR FMR	WA	AI			
P367	Removal of obsolete Supplemental Balancing Reserve (SBR) and Demand Side Balancing Reserve (DSBR)	BSC Panel	10 May 18	No	I					

Mod	Title	Proposer	Date Raised	Urgent	Jun	Jul	Aug	Sep	Oct	Nov
P371	Inclusion of non-BM Fast Reserve actions into the Imbalance Price calculation	UK Power Reserve	11 Sep 2018	No			DMR FMR	AI		
P372	Speeding up the approval process for the publication of BSC data on the BMRS	BSC Panel	14 Sep 2018	No	Ι					
P374	Aligning the BSC with the EB GL change process and derogation approach	SSE	5 Nov 2018	No		AR	DMR FMR	5WDs after approval		
P375	Settlement of Secondary BM Units using metering behind the site Boundary Point	Flexitricity	10 Dec 2018	No			DMR FMR	AI		

Mod	Title	Proposer	Date Raised	Urgent	Jun	Jul	Aug	Sep	Oct	Nov
P376	Utilising a Baselining Methodology to set Physical Notifications for Settlement of Applicable Balancing Services	Enel Trade S.P.A.	11 Dec 2018	No				DMR FMR		
P379	Multiple Suppliers through Meter Splitting	New Anglia Energy	3 January 2019	No	Interim Report					
P380	Revision to the Replacement Reserve Bid Data submission requirements	National Grid	6 February 2019	No	I					

Mod	Title	Proposer	Date Raised	Urgent	Jun	Jul	Aug	Sep	Oct	Nov
P382	Amendments to the BSC in the event of no-deal Brexit	National Grid ESO	4 March 2019	No					DMR FMR	
P383	Enhanced reporting of demand data to the NETSO to facilitate CUSC Modifications CMP280 and CMP281	Innogy	6 March 2019	No			AR	DMR FMR		
P384	The publication of European Electricity Balancing Guideline (EB GL) balancing data by BMRS	National Grid ESO	6 March 2019	No						
P385	Improving the efficacy and efficiency of Section H Default provisions	British Gas	3 April 2019	No				AR	DMR FMR	
P386	Corrections and clarifications to the P344 'Project TERRE' legal text	ELEXON	7 May 2019	No	DMR FMR					I

## PROGRESS OF MODIFICATIONS – The below provides a summary of all open modifications. Full details can be found in the Change Register

P387     Allowing email communications for the BSC Panel Elections process     9 May 2019	DMR FMR	I
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## PROGRESS OF CHANGE PROPOSALS - The below provides a summary of all open modifications. Full details can be found in the Change Register

Key	Assessment Procedure:	CPC: Change Proposal	Committee Decision:	Al: Awaiting	I: Implementation
	<b>PP:</b> Progression Paper	Circular Consultation	AR: Assessment Report	Implementation	
			FR: Final CP Report		

СР	Title	Proposer	Date Raised	Jun	Jul	Aug	Sep	Oct	Nov
CP1508	Updating standards in the CoPs and BSCP601	ELEXON	9 Aug 2018	Ι					
CP1512	Improving the format of BSCP11 forms	ELEXON	26 October 2018	Ι					
CP1513	Updates removing inconsistencies within and between BSCP601, CoP3 and CoP5	ELEXON	12 Nov 2018	I					
CP1514	Number of register digits for smart Meters	ELEXON	17 Dec 2018	I					

## **PROGRESS OF CHANGE PROPOSALS** – The below provides a summary of all open modifications. Full details can be found in the <u>Change Register</u>

CP1515	Amendments to BSCP514 for the Faster Switching Programme	ELEXON	4 January 2019	I			
CP1516	New Interconnector Fuel Type Categories: ElecLink & IFA2	National Grid	7 March 2019				
CP1517	Changes to BSC Configurable Items for the TERRE Final Implementation Date	ELEXON	17 May 2019	AR			
CP1518	Housekeeping change to address errors in the approved changes to BSCP514 for CP1515	ELEXON	23 May 2019	I			

The tables below summarise the scope of each BSC Release. Further information can be found on the <u>Releases</u> page of our website.

June 2019 BSC Release - 27 June 2019						
Change Number	Title of Change	BSC Central Systems/Docum ent only impacts	Ofgem/BSC Panel/Panel Committee Approval Status			
P363	Simplifying the registration of new configurations of BM Units'	Amalgamted into P364	Amalgamted into P364			
P364	Clarifying requirements for registering and maintaining BM Units	Document	Confirmed			
P367	Removal of obsolete SBR and DSBR arrangements	Document	Confirmed			
P372	Speeding up the approval process for BSC Data on the BMRS	Document	Confirmed			
P381	Remove Quarterly Reports	Document	Confirmed			
P380	Revision to Replacement Reserve Bid Data submission deadline requirements	Document	Confirmed			
CP1508	Updating references to the British and International Standards within the relevant Code Subsidiary Documents	Document	Confirmed			
CP1512	Improving the format of BSCP11 forms	Document	Confirmed			
CP1513	Updates removing inconsistencies within and between BSCP601, CoP3 and CoP5.	Document	Confirmed			
CP1514	Number of register digits for smart Meters	Document	Confirmed			
CP1515	Amendments to BSCP514 for the Faster Switching Programme	Document	Confirmed			
CP1518	Housekeeping change to address errors in the approved changes to BSCP514 for CP1515	Document	Pending			

## **BSC SYSTEMS ROADMAP –** SCOPE & DELIVERY UPDATES

Change Number	Title of Change	BSC Central Systems/Document only impacts	Ofgem/BSC Panel/Panel Committee Approval Status	
P384	The publication of European Electricity Balancing Guideline (EB GL) balancing data by BMRS	System	pending	
CP1516	New Interconnector Fuel Type Categories: ElecLink & IFA2	System	Pending	
P366	Changes to Supplier Charges on 'hard-to-read' NHH sites	System	Pending	
P386	Corrections and Clarifications to the P344 legal text	Document	Pending	
P387	Allowing email communications for the BSC Panel Elections process	Document	Pending	

# Standalone Releases - 1 April 2020 effective, release Feb 20Change NumberTitle of ChangeBSC Central<br/>Systems/Document only<br/>impactsOfgem/BSC<br/>Panel/Panel Committee<br/>Approval StatusP354Use of ABSVD for non-BM<br/>Balancing Services at the<br/>metered (MPAN) levelSystemConfirmed

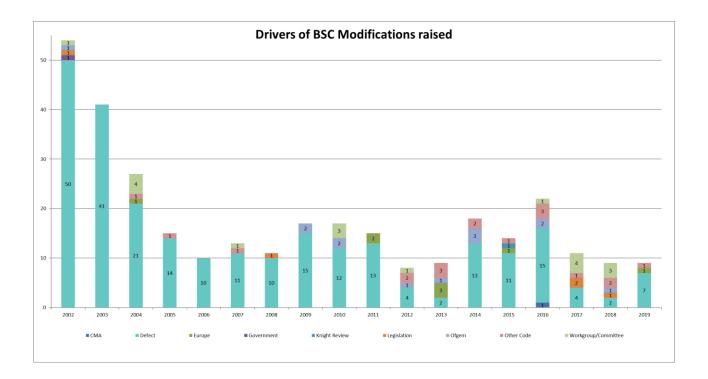
	Ad Hoc Releases							
Change Number	Title of Change	BSC Central Systems/Document only impacts	Ofgem/BSC Panel/Panel Committee Approval Status	Implementation date				
P297	Receipt and Publication of New and Revised Dynamic Data items	System	Confirmed	27 Feb 19				
P373	Reversing the changes relating to Approved Modification P297	Document	Confirmed	27 February 2019 (5WD from Authority Decision)				
P377	Amending Gate Closure references in Market Index Data	Document	Confirmed	18 April - 5 weeks after the 14 March 2019				
P382	Amendments to the BSC to reflect the United Kingdom's withdrawal from the European Union without a deal	Document	Pending	16 WD from Panel approval - planned for 1 Nov 19				

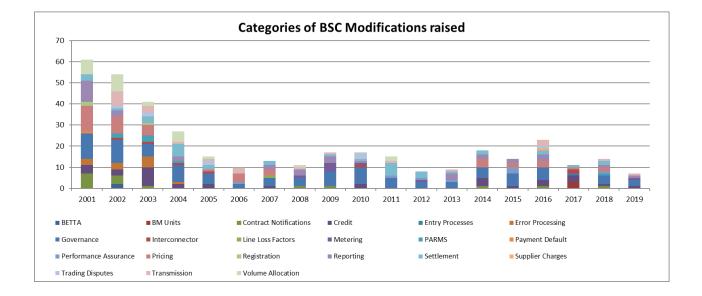
#### November 2019 BSC Release - 7 November 2019

## **BSC SYSTEMS ROADMAP –** SCOPE & DELIVERY UPDATES

TBC Release Date						
Change Number	Title of Change	BSC Central Systems/Docum ent only impacts	Ofgem/BSC Panel/Panel Committee Approval Status			
P332	Revisions to the Supplier Hub Principle	Document	Pending			
P361	Revised treatment of BSC Charges for Lead Parties of Interconnector BM Units	System	Pending			
P371	Inclusion of non-BM Fast Reserve actions into the Imbalance Price calculation	System	Pending			
P374	Aligning the BSC with the EB GL change process and derogation approach	Document	Pending			
P376	Utilising a baselining methodology as an alternative to Physical Notifications	System	Pending			
P379	Enabling consumers to buy and sell electricity from/to multiple providers through Meter Splitting	System	Pending			
P375	Settlement of Secondary BM Units using metering at the asset	System	Pending			
P383	Enabling the aggregation of storage Metering Systes for network charging	System	Pending			
P385	Reviewing BSC rules in regard to actions being taken by the BSC Panel in Events of Default relating to Payment Default and Credit Default	Document	Pending			

## **Modification Trend Charts**





## **Modification Trend Charts**

