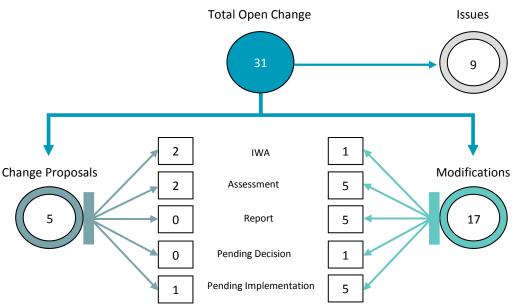
294/03 - BSC Change Report (September 2019) ELEXON

Inside this report:	Page(s):
Modifications	2-18
Change Proposals	20-23
Issues	24-30
Progression	31-36
BSC Systems	37-39
Modification Trend Charts	40-43

Change News

Summary of Open Change



This report provides key				
information on BSC				
Changes covering the				
period between the				
August 2019 and the				
September 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, P371, P374, P375, P376, P379, P383, P385, P386, P388, P389 and P390
- CP1517, CP1519, CP1520 and CP1521

Issue 69, Issue 73, Issue 78, Issue 79, Issue 80, Issue 82, Issue 83, Issue 84 and Issue 85.

New Changes	P389, P390, CP1520, CP1521		
Upcoming Consultations	CP1520, CP1521		
Open Consultations	None		
Decisions required by the Panel:	DMR P371, DMR P374, DMR P383, DMR P389, IWA P390,		
Approval, Rejections & Withdrawal	P388 was approved under Self-Governance on 8 August 2019.		
Key: TWA: Initial Written Assessment AC: Assessment Procedure Consultation AP:			

Key: IWA: Initial Written Assessment, AC: Assessment Procedure Consultation, AR: Assessment Report, RC: Report Phase Consultation, DMR: Draft Modification Report

P332: Revisions to	Update			
Date Raised:		28 January 2016	Proposer:	Smartest Energy
Target Implementa	ation Date:	Post 2020	Current Status:	Assessment Procedure – On Hold
Latest Update:	The Proposer believes his issue has not yet been addressed in any of the wider Ofgem initiatives. It remains unclear whether these initiatives will address the issues created by 'customer appointed agents,' and is therefore cautious about waiting any longer, given the length of time P332 has already been raised. Ofgem's preferred TOM for Market Wide Half Hourly Settlement reduces the scope of P332 to the sub-100 kW Advanced Metered sector and Half Hourly Data Collectors and Meter Operator Agents only. However, there remains uncertainty on the future market arrangements and as such the Proposer believes a prudent next step would be to seek views from Ofgem as to whether the issue identified under P332 is recognised by Ofgem and to what extend, and whether any of Ofgem's initiatives will likely address it. The Proposer is also working closely with ELEXON to understand whether the PAF Review could sufficiently address his concerns. It is also worth noting that a number of changes have been progressed since P332 was			
	 raised that contribute to addressing the performance issues associated with 'customer preferred agents': P283 and related commissioning CPs; Issue 73 fault resolution process CPs. MHHS TOM establishing the Advanced Segment; PAF Review (Supplier Charges and performance standards); Proposed changes to the D0268 flow (in progress). 			
Next Event:	The Proposer's latest view will be presented to the Panel on 12 September 2019.			
Recommendation	We therefore invite the Panel to seek the views of the Authority as detailed above, and to approve an extension to the P332 Assessment Procedure. Provisionally we recommend a one-month extension, subject to Panel and Ofgem views to be provided on 12 September 2019.			
Issue:	The BSC when originally created was designed to support the Supplier hub principle and to this end is silent on the practice of 'Customer appointed Agents'. The 'appointment' of Agents by Customers , outside of the Supplier hub principle, makes managing Agent performance and delivery of obligations within the BSC difficult, resulting in a reduction in a Supplier's ability to manage performance against industry targets and risking non- delivery of specific obligations.			
Current Solution:	P332 proposes to amend the roles and responsibilities of Supplier Agents. This includes requiring Supplier Agents to become signatories to the Balancing and Settlement Code (BSC).			
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 – P332 was effectively placed on hold. 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 were scheduled to check whether P332 should re-start, remain on-hold or be withdrawn.

The Panel approved a 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. 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. 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.

<u>P361</u> : Rev	P361: Revised treatment of BSC Charges for Lead Parties of Interconnector BM Units				
Date Raised:		31 October 2017	Proposer:	Nord Pool Spot AS	
Target Imple Date:	ementation	With Authority (submitted 13 July 2018)			
Latest Update:	Ofgem reque May 2019, as revised impace 2020, where	ing the submission of the Final Modification Report to Ofgem in July 2018, a requested a revised BSC impact assessment and Implementation Date in 019, as the original Implementation Date expired. ELEXON provided the d impact assessment and a suggested Implementation Date of 27 February where an Ofgem decision is received by 31 August 2019.			
Next Event:	P361 is awaiting Ofgem decision.				
Issue:	The EU Third Package (Article 2 of Regulation 714/2009) expects Interconnectors to be treated as an extension of the Transmission System and not as Production or Consumption. However, for the purposes of calculating BSC Charges, BM Units in Great Britain are currently treated as either a Production BM Unit (generation) or a Consumption BM Unit (demand). The Proposer asserts that the treatment of Interconnector BM Units in the BSC Charges calculations is not aligned with the EU Third Package.				
Current Solution:	This Modification Proposal seeks to exclude Interconnector Balancing Mechanism (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.

Ofgem indicated at the Panel on 11 April 2019 that it was minded to approve P361. As a result Ofgem have asked ELEXON for an updated impact assessment, as the proposed Implementation Date of 28 February 2019 has now passed.

P371: Inclusion of non-BM Fas Price	Update		
Date Raised:	UK Power Reserve		
Target Implementation Date:	25 June 2020 (June 2020 Release)	Current Status:	Report Phase

Latest Update:	The P371 Report Phase Consultation was issued 13 August with responses due by 27 August 2019. The Panel initially believe P371 should be approved.
Next Event:	The P371 Draft Modification Report will be presented to the BSC Panel on 12 September 2019.
Issue:	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.
	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.
	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:	This Modification Proposal aims to include non-BM Fast Reserve actions in the calculation of the Imbalance Price, by including them in the Balancing Service Adjustment Data file. This will make the Imbalance Price more reflective of the actions taken by the System Operator.

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. ELEXON undertook Impact Assessments to assess the costs and implementation times of potential solutions.

The Third P371 Workgroup was held on 5 June 2019 where the Workgroup agreed its preferred solution. The Assessment Procedure Consultation was Issued on 17 June 2019 for 15WD.

Responses to the Assessment Procedure Consultation were due on 5 July 2019. The final Workgroup was held on 16 July for the Workgroup to consider consultation responses.

The Assessment Report was presented to the Panel on 8 August 2019.

<u>P374:</u> Aligning	Update			
Date Raised:		5 November 2018	Proposer:	SSE
Target Implementa Date:	tion	5WD following Authority decision	Current Status:	Assessment Procedure
Latest Update:	P374 was issued for Report Phase consultation over the period 13 August 2019 to 27 August 2019. The Panel initially believe the P374 Alternative Proposal should be approved.			
Next Event:		Draft Modification Report ber 2019, where it will	•	
Issue:	P374 seeks to ensure that the BSC is aligned with the European Electricity Balancing Guideline (EB GL – Regulation 2017/2195) derogation and change process by ensuring that BSC Modifications are not implemented until the EB GL change process has completed and that BSC Derogations cannot be granted for provisions that meet the EB GL balancing terms and conditions. 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.			
	At its third meeting, P374 Workgroup members voted to raise an Alternative Modification that is identical to the Proposed, except in that it will not explicitly preclude derogations from BSC provisions that constitute Article EBGL Article 18 terms and conditions related to balancing. Instead, it will allow each derogation application to be assessed on a case-by case basis against the existing derogation criteria set out in BSC Section H 10.4.3(d), which do allow derogations to be granted from any BSC provision which constitutes Legal Requirement or Relevant European Legal Requirement as defined in the BSC.			
History:	1			

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 quorcacy issues. The BSC Panel granted P374 with a two month extension until July 2019.

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 was required to further develop the solution.

The third Workgroup meeting was held on Friday 7 June 2019 to review proposed legal text for two options. The Workgroup agreed to raise an Alternative solution. The Workgroup also requested a one-month extension to P374, which was approved by the BSC Panel at its meeting on 13 June 2019. This was due to the agreement of the solutions taking one more meeting to agree than planned.

However, the Workgroups were delayed due to quoracy issues. Further delays were experienced as the agreement of the solution took longer than anticipated.

The final P374 Workgroup was held on Thursday 25 July whereby the majority of the Workgroup voted for the alternative solution. They also unanimously agreed the BSC legal text, BSC Applicable Objectives and that it should not be progressed as Self-Governance.

P375: Settlement of Secondary BM Units using metering behind the site Boundary Point				Update	
Date Raised:	Date Raised:10 December 2018Proposer:				
Target Implementa	ation	November 2020	Current Status:	Assessment	
Date:				Procedure	
Latest Update:	conducted a	75 Workgroup was he a detailed review of the ode of Practice 11.			
Next Event:	The next Workgroup will be held in mid-October to conduct a detailed review of the draft redline changes, CGI Impact Assessment and Assessment Consultation questions.				
Issue:	Consultation questions. 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.				

Current Solution:	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).				

History:

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.

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.

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 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 was clear that these elements required 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 issued. This will not be possible in the time available under the existing P375 timetable. A six-month extension was therefore requested by the Workgroup.

The BSC Panel approved a six-month extension to the P375 Assessment Procedure at their meeting on 13 June 2019. The P375 Assessment Report will be presented to Panel at its January 2020 Panel meeting.

The fourth Workgroup was held on 4 July 2019. Discussions focussed on the customer journey registration process and the role a Meter Operator Agent should play. The Workgroup reviewed a use case to illustrate a 'metering by differencing' approach with multiple VLP actions on a site. The Workgroup also reviewed appropriate Performance Assurance Techniques for VLPs.

	-	ning Methodology to nt of Applicable Bala	-	Update
Date Raised:		11 December 2018	Proposer:	Enel Trade S.P.A.
Target Implementa Date:	ation	ТВС	Current Status:	Assessment Phase
Latest Update:		Workgroup was held or Business Requirement	-	to consider and
Next Event:		orkgroup will be held la Information.	ate September 2019 to	o review an industry
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 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 allows 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'.			
	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:	L			

The Initial Written Assessment was presented to the Panel on 13 December 2018 and was entered into the Assessment Procedure.

P376 was raised by Enel Trade S.P.A. on 11 December 2018.

The first Workgroup meeting, held jointly with P375, was held on 25 January 2019, where the Workgroup explored the issue by discussing possible effects on the Boundary Point and how links 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.

ELEXON worked with the Proposer to identify characteristics of baseline methodologies currently used in other markets.

The third Workgroup was held on 3 June 2019, where the Workgroup considered baseline methodologies.

ELEXON worked with the Proposer to draft initial Business Requirements and considered what analysis, if any, should be undertaken on preferred baselining methodologies.

<u>P37</u>	P379: Multiple Suppliers through Meter Splitting				
Date Raised:	: 3 January 2019 Proposer:			New Anglia Energy	
Target Imple Date:	Target Implementation Date:November 2020 (subject to Assessment of 				
Latest Update:	the detailed p functions invo both models.	brkgroup 8 meeting was proposed, and alternative plved in multiple supply. The Workgroup also con assurance, data flows an	e models covering the The Workgroup agree nsidered the following	different entities and d with processes in items: P379 FAQ,	
Next Event:	meeting is fo • Test • Agree • Agree	 The next P379 meeting will be held on 24 September 2019. The purpose of the neeting is for the Workgroup to: Test life use-cases Agree on conflict resolution options Agree on the disputes process Start reviewing the P379 Business Requirements 			
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.				
Current Solution:	This Modification will enable individual consumers to be supplied by multiple Trading Parties, including Suppliers through a Balancing and Settlement Code (BSC) Settlement Meter at the Boundary Point. It will amend the market rules to support development of non-traditional business models and innovation, expanding upon the solution to be implemented by BSC Modification P344 'Project TERRE implementation into GB market arrangements'. It will achieve this through the creation of a new Party Agent role, the Customer Notification Agent (CNA),				

who would reconcile power flows through the Settlement Meter, enabling accurate
allocation of volumes and costs, which in turn will allow Trading Parties to reflect
these volumes in their bills and payments to consumers.

History:

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.

An interim report was presented to the Panel on 13 June 2019, as agreed as part of the approved P379 progression plan. The Panel approved a six-month extension and advised the Workgroup to consider how the Modification could be scoped to deliver earlier. A meeting was held on 27 June 2019 to finish discussing balance responsibility and the Party Agent Role.

The P379 WG6 and WG7 meetings were held on 23 and 24 July 2019 respectively. The Workgroup considered two 'operating models' for the P379 solution, highlighting the key priorities and areas of concern. A key part of P379 is the provision of metered data for assets (e.g. electric vehicle) behind the Boundary Point Meter. ELEXON provided an update on P375, which is looking at metering systems not installed at the Boundary Point. Further P375 updates will be provided to the P379 Workgroup.

P382:Amendments to the BSC to reflect the United Kingdom's withdrawal from the European Union without a dealNo Update					
Date Raised:		4 March 2019	Proposer:	National Grid ESO	
Target Imple Date:	mentation	16 WDs after Panel approval (after Self- Governance window expires)	Current Status:	Report Phase	
Latest Update:	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's 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 felt 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				
Next Event:	to the BSC as well as liaising with Ofgem, BEIS and other Code Administrators. If we assess that the Panel need to make a decision on P382 ahead of the 10 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				
Issue:	The Europear immediately f which may le	(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. 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				

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					
Date Raised:		6 March 2019	Proposer:	Innogy		
Target Imple Date:	ementation	April 2021	Current Status:	Assessment Procedure		
Latest Update:		ued for Report Phase Co e by 27 August 2019. Tl	-			
Next Event:	The P383 Dra September 20	aft Modification Report v 019.	vill be presented to the	BSC Panel on 12		
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 Solution:	The Proposer suggests a Modification of the BSC and a certain number of its Code 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:	History:					
	P383 was raised 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.					
The first Workgroup was held on 29 April 2019. The Workgroup have identified a solution, agree on the Applicable BSC objectives, and agreed that it should not be progressed as Self-Governance.						
	ELEXON held the second Workgroup meeting on 11 June 2019 where they discussed the legal text, business requirements and the Service Provider Impact Assessment.					

P383 was sent out for Assessment Procedure Consultation on 2 July 2019, with responses due by 22 July 2019.

The final P383 Workgroup was held on Monday 29 July 2019. The Workgroup agreed on the

Applicable BSC Objectives, the draft legal text, that P383 should not be progressed as Self-Governance, the proposed Implementation Date, and that there were no alternative solutions.

<u>P385:</u> Improvir	Update			
Date Raised:		3 April 2019 10 Working Days following Authority Decision	Proposer:	Centrica Assessment Procedure
Target Implementa Date:	ation		Current Status:	
Latest Update:	The Assessment Procedure Consultation closed on 21 August 2019. There were 3 responses from Suppliers, all of whom are supportive of the proposal and its recommendation as a Self-Governance Modification.			
Next Event:	The third meeting of the P385 Workgroup will be held on 30 September where Members will consider responses to the Consultation and provide final views on the P385 solution. Following this, the Assessment Report will be presented to the BSC Panel on 10 October 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 ar 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 3 'Default' in order to increase visibility to industry of Parties at risk and t potentially allow for earlier remedial action by the BSC Panel. 			
History:	1			

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.

Following experiencing difficulty confirming a date for the first Workgroup meeting, due to quoracy issues, ELEXON externally engaged prospective Members and secured the necessary number of voting Workgroup Members.

The first Workgroup for P385 was on 17 June 2019. The Workgroup developed a large amount of the solution, identifying an approach where parameters for certain Events of Default are placed under Panel control.

The second Workgroup for P385 took place on 15 July 2019, where all remaining areas of the solution were agreed. The Workgroup is currently reviewing the draft Assessment Procedure

Consultation.

P386: Corre	Update				
Date Raised:		7 May 2019	Proposer:	National Grid Awaiting Implementation	
Target Imple Date:	ementation	7 November 2019	Current Status:		
Latest Update:	The Panel ap	proved P386 on 13 Jui	ne 2019		
Next Event:	P386 will be i	mplemented on 7 Nov	ember 2019, as part of	the 2019 BSC Release.	
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:	1				
P386 was raise	ed by National	Grid on 7 May 2019.			
-	-		y recommended that P		

At its meeting on 9 May 2019 the Panel unanimously recommended that P386 be approved as a Self-Governance Modification. P386 was issued for a Report Phase consultation on 13 May 2019, with responses due 3 June 2019.

The P386 Draft Modification Report was presented to the BSC Panel on 13 June 2019. Subject to approval as a Self-Governance Modification, the Self-Governance appeal window is open from 13 June 2019 to 4 July 2019.

P387: Allowi	<u>P387</u> : Allowing email communications for the BSC Panel Elections process					
Date Raised:	BSC Panel					
Target Imple Date:	mentation	7 November 2019	Current Status:	Awaiting Implementation		
Latest Update:	The Panel ap	The Panel approved P387 on 13 June 2019.				
Next Event:	P387 will be implemented on 7 November 2019, as part of the November 2019 BSC Release.					
Issue:	need of impre	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:	The proposed solution is to amend BSC Section H 'General' Paragraph 9.2.5 to allow BSC Panel Election notices, nomination / voting papers etc. to be sent and 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
History:	from time to time.

Modification P387 was raised by the BSC Panel on 9 May 2019. The Panel unanimously provided their initial approval for the Modification to be progressed as Self-Governance and to proceed directly to the Report Phase. The Panel initially approved the Modification, its impact on the Applicable BSC Objectives and the draft legal text.

The BSC Panel considered the Draft Modification Report at it meeting on 13 June 2019 and approved the P387 Solution under Self-Governance. P387 was issued for a 15 Working Day appeal window, which closed on Thursday 4 July 2019.

<u>P</u>	P388: Aligning the P344 & P354 Solutions					
Date Raised:		3 July 2019	Proposer:	NETSO		
Target Imple Date:	mentation	1 April 2020	Current Status:	Awaiting Implementation		
Latest Update:	The Panel un	aft Modification Report v animously approved the The Self-Governance a	e P388 Draft Modificatio	on Report under Self-		
Next Event:		mplemented on 1 April				
Issue:	P344 and P354 were developed in isolation but have a number of interactions that need to be aligned in order for both ABSVD and TERRE volumes to be settled correctly. The current legal texts contain contradictory defined terms and incompatible processes (e.g. the MSID Pair Half Hourly Delivered Volumes allocation process). The current P344 legal text can be interpreted in divergent ways which may lead to unintentional Party non-compliance with the intended obligations set by the P344 workgroup.					
Current Solution:	Additional clarification is needed in defined term to account for both P344 and P354. In addition, a number of clarifications are needed to the P344 legal text to remove the possibility of divergent interpretations and ensure there are no barriers to Party compliance with the new obligations. It is proposed that these will be addressed along with the alignment of the P344 and P354 solutions.					
History:	History:					
P388 was raised by NETSO on 3 July 2019. The P388 Initial Written Assessment was presented to the BSC Panel on 11 July 2019.						
The P388 Repo 2019.	ort Phase Cons	ultation was issued 17	luly 2019, with respons	es due by 30 July		

<u>P389:</u> Reso	Update				
Date Raised:		1 August 2019	Proposer:	Green Frog Power	
Target Imple Date:	mentation	Current Status:	Report Phase		
Latest Update:		hase Consultation was is were no responses to the be approved.	-		
Next Event:	The Draft Modification Report will be presented to the Panel on 12 September when the Panel will determine whether to approve P389.				
Issue:	There is a conflict between the rules in the Balance and Settlement Code (BSC) and the Capacity Market (CM) rules regarding how Balancing Mechanism (BM) Units are registered. Removing this conflict from the BSC will clarify the arrangements and ensure BSC Parties remain compliant with both the BSC and CM rules.				
Current Solution:	Delete BSC Section K 3.1.8(b)				
History:	1				
Initial Written	Assessment wa	2019 with a recommend as presented to the Pane report Phase and initially	l on 8 August 2019. Th	ne Panel agreed that	

<u>P390:</u> Allowi	Update					
Date Raised:		12 August 2019	Proposer:	E.ON		
Target Implementation Date:		5 Working Days after Authority decision	Current Status:	Initial Written Assessment		
Latest Update:	P390 was ra	P390 was raised by E.ON on 12 August 2019.				
Next Event:	The IWA will be presented to the Panel on 12 September 2019. ELEXON are ascertaining the most appropriate date for the first Workgroup, proposed for early October 2019 subject to the availability of the minimum number of members to be quorate.					
Issue:		The BSC restricts the activities of ELEXON and in the absence of a specific Modification any additional activities cannot be pursued by ELEXON (even when				

Chang	e Proposals - UPDATES & DECISIONS
	those activities would be of benefit to BSC Parties, industry generally and/or the consumer).
	In the past specific Modifications have been necessary which have enabled ELEXON to provide the Warm Homes Discount Reconciliation service, EMR settlement, and to participate in gas performance assurance framework and REC manager appointment processes.
	Such individual Modifications to extend ELEXON's vires are time consuming and can be an unnecessary distraction for industry. They can also result in ELEXON being unable to pursue an opportunity within a required timeframe.
Current Solution:	A framework into the BSC that allows the ELEXON Board to determine whether ELEXON can undertake additional activities provided certain conditions are met. All of the conditions introduced in previous Modifications to ELEXON's vires, P330 'Allowing ELEXON to tender for the Uniform Network Code Gas Performance Assurance Framework Administrator (PAFA) role' and P365 'Enabling ELEXON to tender for the Retail Energy Code (REC)' are included, plus some additional conditions to safeguard the interests of BSC Parties.
History: P390 was raised	by E.ON on 12 August 2019.

<u>CP1516:</u> Ne	CP1516: New Interconnector Fuel Type Categories: ElecLink & IFA2			No Update	
Date Raised:		7 March 2019	Proposer:	National Grid	
Target Imple Date:	mentation	30 November 2019	Current Status:	Awaiting Implementation	
Latest Update:	CP1516 was presented to the BSC Panel for decision on 11 July 2019. The Panel approved CP1516 for implementation on 30 November 2019.				
	to also appro	are required to approve ve the changes to the B ing amended via CP1516	SC subsidiary documen		
Next Event:		e implemented on 30 N 19 BSC Release.	ovember 2019 as part	of an ad-hoc	
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>I</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).

CP1516 was published for consultation on 17 May 2019, with responses due by 5pm Thursday 13 June.

<u>CP1517:</u> Cha	-	Configurable Items f plementation Date	or the TERRE Final	Update
Date Raised:		17 May 2019	Proposer:	ELEXON
Target Imple	mentation	TERRE Final	Current Status:	Assessment
Date:		Implementation Date		Procedure
Latest	CP1517 was	presented to the SVG or	3 September 2019 for	decision. SVG
Update:	approved CP:	1517 for implementation		
Next Event:	CP1517 will be implemented on the P344 Final Implementation Notice as a standalone release.			
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:	1			
	•	N on 17 May 2019. CP1 due by 13 June 2019.	517 was issued for indu	ustry consultation on

While CP1517 was out for the first industry consultation, ELEXON worked with its service provider to finalise the design of the P344 'Project TERRE' solution and, as a result, some further changes are required to the CP1517 redlining.

CP1517 was issued for a second consultation to allow minor changes to be incorporated into the interface definition. The consultation will be issued on 8 July 2019, with a response deadline of 9 August.

The Final CP Report was presented to the ISG on 20 August 2019 who unanimously approved.

<u>CP1519</u> : Treatment of Low Capacity Connections for Site Specific Line Loss Factor Calculations			Update
Date Raised:	16 July 2019	Proposer:	UK Power Networks

Chang	Change Proposals - UPDATES & DECISIONS					
Target Imple Date:	mentation	27 February 2019	Current Status:	Assessment Procedure		
Latest Update:	CP1519 was issued for consultation on 12 August 2019 until 6 September 2019. the time of drafting this report one response has been received from the proposer.			•		
Next Event:	CP1519 will b SVG on 8 Oct	e presented for decisior ober 2019.	to the ISG on 17 Sept	ember 2019 and the		
Issue:	Line Loss Factors (LLFs) are calculated and applied to Metered Volumes to account for distribution losses. LLFs are calculated on an individual basis for sites connected at Extra High Voltage (EHV) and on a generic basis for other connections.			lividual basis for sites		
	subordinate s less and the Apparatus e.g turbine is not maximum de	are an increasing number of EHV Sites with a 'main' connection and a inate small-scale connection. The subordinate connection is often 1 MVA or d the majority are ancillary import connections for Generating Plant and itus e.g. to power aircraft avoidance lights on wind turbines when the e is not Generating its own power. Subordinate connections have low um demand and consumption and, if they were single connections in their ght, would be connected at lower voltage levels with generic LLFs.				
Current Solution:	CP1519 proposes to apply Generic LLFs appropriate to the voltage of connection to sites with a capacity less than 1 MVA. This would formalise a default replacement process for low consumption sites within Principle 17 of the LLF calculation principles within BSCP128.			se a default		
History: CP1519 was ra 2019 and SVG		2019 and the progress019.	ion paper presented to	the ISG on 23 July		

<u>CP1520:</u>	Clarification	to 'Change of Owner BSCP537	ship' process in	Update
Date Raised:		8 August 2019	Proposer:	ELEXON
Target Imple Date:	ementation 18 December 2019 Current Status: Assessment			Assessment
Latest Update:	CP1520 was presented to the ISG on 20 August 2019, PAB on the 29 August 2019 and SVG on 3 September 2019. All three committees noted that CP1520 had been raised and the proposed progression timetable.			
Next Event:	CP1520 will be issued for industry consultation on 9 September 2019, with responses due by 4 October 2019.			
Issue:	The change of ownership process in BCSP537 is not fit for purpose; leading to confusion around the requirements following a change of ownership.			

Chang	ge Proposals - UPDATES & DECISIONS
Current Solution:	CP1520 proposes to introduce a new Change of Ownership letter template into BSCP537, which will be used for the Qualified Person to confirm that it will continue to fulfil its obligations, despite the Change of Ownership of the company.
	In addition to the Change of Ownership letter, Qualified Persons (other than Suppliers and VLPs) will be required to provide a separate statement confirming whether a Material Change has been made as per BSCP537 section 2.6.1.
	The solution to this CP will amend section 2.6 of BSCP537 to reflect the revised process. This includes changing 'Applicant' to 'Qualified person' and citing the Change of Ownership letter.
	CP1520 also proposes to allow PAB to make a decision on whether the Qualified Person needs to:
	a) Re-Qualify; or
	b) Not Re-Qualify;
History:	
CP1520 was ra	ised on 8 August 2019 by ELEXON.

<u>CP</u>	<u>CP1521</u> : BSCP70 Amendments for IA and IEA				
Date Raised:		27 August 2019	Proposer:	ELEXON	
Target Imple Date:	mentation	February 2020	Current Status:		
Latest		raised by ELEXON on 27	-		
Update:	presented to	the SVG on 3 Septembe	r 2019 for information.		
Next Event:	The CP Progr	ession Paper will be pre	sented to the ISG on 1	7 September 2019.	
Issue:	BSCP70 currently omits Interconnector Administrator (IA) and Interconnector Error Administrator (IEA) from being required to undergo CVA Qualification Testing. As there are four new Interconnectors scheduled to go live over the next four years (with a further seven planned) there is a potential risk to Settlement if the IAs and IEAs for the new Interconnectors have not demonstrated that they are able to send and receive the relevant Settlement data flows to/from BSC Central Systems.				
Current Solution:	BSCP70 is amended to include IA and IEA in the data flows relevant to IEAs and IAs for CVA Qualification Testing.				
History:	1				
CP1521 was ra	ised by ELEXO	N on 27 August 2019.			

Issue	69: Performa	nce Assurance Frai	nework Review	Update
Date Raised:	1	30 March 2017	Proposer:	ELEXON
Latest Update:	Following the Issue 69 meeting to discuss the options for change to the SVA Qualification/Re-Qualification on the 2nd July 2019. A paper was presented to PAB providing an update on the review of the Qualification and re-Qualification Performance Assurance Technique. The PAB noted the updates and agreed to sub-group to discuss options to include in the final Qualification and Re- Qualification PAF Review recommendations report. Following the meeting of to sub group the PAF team are finalising the recommendations to be presented September PAB meeting on 26 September 2019.			
Next Event:	The Supplier Charges Review (Part 2) Workshop will be held on the 19 September 2019.			
Issue	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.

Issue 69 will now be focussing on Qualification and Re-Qualification well as Supplier Charges.

The Issue 69 Qualification and Re-Qualification Workshop was held on Tuesday 2 July 2019, the outcome of this workshop fed into the recommendations presented to PAB.

Issue 73: Re	view of fault	management and rea	solution timescales	Update	
Date Raised:		12 October 2018.	Proposer:	SSE Ltd	
Latest Update:	ELEXON presented an update to the Issue Resolution Expert Group in August 2019, following which it will determine whether another Issue Group meeting is required.				
Next Event:	changes to th	scussing with the Issue ne recommendations pro orporated for progressi	posed by the Issue Re		
Issue:	Several issues have been identified in the fault resolution process where a MOA is not best placed to rectify faults on Measurement Transformers owned by the Licensed Distribution System Operator (LDSO). This results in the Meter Operator Agent (MOA) being unable to resolve the fault in a timely manner to remain complaint with the BSC. The notification process used in the faults process should also be amended to reflect the recommendations of the Fault Investigation Review Group (FIRG).				
History:					
Issue 73 was r	aised by SSE o	n 12 October 2018.			
The first Works FIRG process.	The first Workgroup was held on 22 November 2018 where amendments were proposed to the FIRG process.				
		neld on 7 February 2019 Jss potential SLAs and b	-		
	ELEXON has used data from Workgroup members to help define service level agreements for resolving faults and draft redlining to carry forward proposed changes .				
	The third Workgroup for Issue 73 was held on 13 June 2019, for the Workgroup to consider the proposed SLAs and process for involving Distributors in the fault resolution process.				
	ELEXON adapted the draft redlining for the proposed Change Proposals to take account of comments made by the Issue 73 Workgroup.				
	Issue 78:Measurement and monitoring of SettlementUpdateperformance				
Date Raised:		29 March 2019	Proposer:	Opus Energy Limited	
1 - 4 4	Line in a line	d the BAE review work	 		

Latest	Having allowe	Having allowed the PAF review work to progress over the summer an Issue Group			
Update:	meeting was	held on 28 August 2019	. Two actions have aris	en from Issue 78:	
	Perfo	tigate raising a Modifica rmance Levels are on a a and GSP Group;	· ·	,	

2. Investigate making PAB processes more transparent e.g. the agenda will list which companies are presenting to PAB.

Next Event:	The Issue Report will be presented to the Panel on 10 October 2019.
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 r	aised by Opus Energy Limited on 29 March 2019.

The first meeting was exceptionally well attended (25+ attendees) on 24 April 2019. ELEXON analysed Supplier Charge data from various sources and modelling various options to assess potential material impacts. Options being investigated include, but are not limited to: Amending Supplier Charge rates to various values. Removing all Supplier Charges, removing some Supplier Charges, increasing and decreasing target levels to between 0% and 100% and combinations of each of these options.

Following discussion with the Proposer in terms of how Issue 78 overlaps with the PAF Review, the Proposer expressed their intent to continue with I78 with a view to investigating if there are any short term solutions to 'fill the gap' ahead of any PAF Review changes being made. It was agreed that any synergies between I78 and the PAF Review should continue to be explored and pursued where applicable once the PAF review had time to formulate some initial ideas and as such there was some delay between the first and second Issue Group meetings to allow for PAF review work to feed into Issue 78.

Issue 80: Inc the relevant	n Update				
Date Raised:		16 April 2019	Proposer:	Association of Meter Operators (AMO)	
Latest Update:	with Meter M Meter Manuf	Given the Issue 80 Workgroup recommendation, ELEXON is continuing to enga with Meter Manufacturers to determine the impact of increasing meter memory Meter Manufacturer feedback will be discussed with the Workgroup before finalising the Issue 80 Report.			
Next Event:	 A second Issue 80 Meeting will be held on 19 September 2019. The purpose of the meeting is for the Workgroup to: Review Meter manufacturer feedback Address concerns and rational for making proposed changes Agree and clarify Change Proposals 				

	Address draft Issue report feedback
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 raised by AMO on 16 April 2019.

The first Issue 80 meeting date was scheduled for 24 June 2019. A Request for Information inviting Meter Manufacturer, Party Agents, Parties and other interested parties views of the proposed change was issued prior to the meeting for group's consideration.

The first Issue 80 Workgroup was held on 24 June 2019. The Workgroup discussed the issue and reviewed the RFI responses. The Workgroup agree there is a need to increase meter memory and a Change Proposal should be raised. Before raising the change ELEXON will further engage with meter manufactures to determine the impact of increasing meter memory.

	-		up/Run-down rates a) publication on BMRS	•				
Date Raised:		12 June 2019	12 June 2019 Proposer:					
Latest Update:	ELEXON is cu	rrently seeking Wo	ue 81.					
Next Event:	ELEXON will arrange an Issue Group once there are sufficient members (at least 5).							
Issue:	P297. NGESC consumer be assessed to s	preceived feedback nefits, by exploring support the develop ronisation (LTCS) p	that there may be an op how the data items origi ment of Run-up/Run-dov					
History:	1							
Issue 81 was r	aised by Natio	nal Grid ESO on 12	June 2019.					

Issue 82 Expand the BSC Panel's ability to raise Modification Update Proposals							
Date Raised:		19 June 2019	Proposer: ELEXON				
Latest Update:		The Issue 82 meeting was held on 20 August 2019. The Workgroup considered whether the BSC Panel's ability to raise Modifications should be expanded. Th					

Chang	ge Proposals - UPDATES & DECISIONS
	Workgroup recommended that no Modification be raised to expand the BSC Panel's ability to raise Modifications.
	ELEXON is to carry out analysis on the Panel's current role is raising Modifications and provide findings to the Panel and Workgroup.
Next Event:	The Issue 82 Final Report will be submitted to the October 2019 BSC Panel meeting.
Issue:	Currently BSC Section F2.1.1 restricts the BSC Panel's ability to raise Modification Proposals. Issue 82 seeks to expand the Panel's ability to raise Modification Proposals. ELEXON believes that expanding the Panel's ability to raise Modification Proposals would:
	• Increase the effectiveness of the Panel, and thereby the BSC;
	Reduce the burden on BSC Parties to be Proposers;
	• Promote improvements in the BSC's self-governance arrangements; and
	• Help maintain consistency with the Panel's objectives as set out in the BSC.
History:	1
Issue 82 was r	aised by ELEXON on 19 June 2019.

	-	e Buy Price Adjustme incurred by NGESO	ent reflects all	Update					
Date Raised:		1 July 2019	Proposer:	Sebmcorp UK					
Latest Update:	components t	kgroup was held on 7 A that are incorporated in ontinue to be reflected i	the Buy Price Price Adj	ustment and how					
Next Event:	The second meeting for Issue 83 will be held early October 2019 once there is more clarity on National Regulatory Authority decision for T&Cs.								
Issue:	Regulation (E electricity bal Adjustment c aim to ensure	I consider the principles (U) 2017/2195 of 23 Nov ancing to assess how th an continue to be used i that it continues to be y System Operator.	vember 2017, establish e components of the B in the Imbalance Price	ing a guideline on uy Price Price calculation. This will					
	In addition to this, Issue 83 will consider what components are included in the Buy Price Price Adjustment, including reserve actions, to ensure that it continues to be properly reflective.								
History:									

Issue 83 was raised by Sebmcorp UK on 1 July 2019.

		recovery of the Radionts extension	o Teleswitch	Update			
Date Raised:		10 July 2019	Proposer:	SSE Electricity Limited			
Latest Update:	existing RTS of recovery acro The Workgro Modification of Solut contr opera Solut a Mo costs the b	dification to introduce a of RTS under the BSC. elow options: Option b) calculating Option c) calculating	NA and ELEXON, to f I Option a) to be imp ess Solution 2 Option vill result in a change nd ELEXON to also fa f a BSC Party wishes requirement for the Solution 2 could be costs proportionatel costs by RTS User m	acilitate RTS cost lemented and a b) or c). to the existing RTS cilitate the RTS to do so, they can raise BSCCo to recover the delivered through one or y across all Suppliers or; narket share basis.			
Next Event:	The Issue 84	Final Report will be sub	mitted to the Septen	ber BSC Panel meeting.			
Issue:	The Issue 84 Final Report will be submitted to the September BSC Panel meeting. The current billing and cost recovery of teleswitch payments for Suppliers, operated by the ENA, is not fit for use. There is not sufficient default arrangements, including a mutualisation process. Further, new suppliers entering the market are not obliged to pay. There is an opportunity for ELEXON to support Energy UK in resoling this common industry issue.						
History:	1						
Issue 84 was F 31 July 2019.	Raised by SSE I	Electricity Limited on 10	July 2019. The Issue	84 meeting was held or			

<u>Issue 85:</u> Removal of obli every 12 months from BS	-	nergised sites once	Update
Date Raised:	27 August 2019	Proposer:	TMA

Chang	ge Proposals - UPDATES & DECISIONS
Latest Update:	Issue 85 was raised by TMA on 27 August 2019.
Next Event:	We will be looking to hold the first Issue 85 Workgroup in September 2019, subject to Issue Group Member's availability.
Issue:	There is an obligation on the NHHDC to visit de-energised sites annually (footnote 99 from BSCP404). Originally, the obligation only applied to sites where no remote communication was available. That was removed by CP1019 in 2005. The Obligation for regular site visits was removed from the Supplier Licence obligations in 2016 by the Authority as other obligations, such as LC 21b.4 would prompt the Supplier to use a risk based approach to ensure that sites are visited regularly enough to avoid health and safety issues. This leaves the NHHDC agents exposed; unless they are instructed by the Supplier to visit de-energised annually, they are in breach of BSCP504.
History:	<u>.</u>
Issue 85 was r	aised by TMA on 27 August 2019.

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

Mod	Title	Proposer	Date Raised	Urgent	Sep	Oct	Nov	Dec	Jan	Feb
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	AI					
P371	Inclusion of non-BM Fast Reserve actions into the Imbalance Price calculation	UK Power Reserve	11 Sep 2018	No	DMR FMR	AI				
P374	Aligning the BSC with the EB GL change process and derogation approach	SSE	5 Nov 2018	No	DMR FMR	5WDs after approval				

Mod	Title	Proposer	Date Raised	Urgent	Sep	Oct	Nov	Dec	Jan	Feb
P375	Settlement of Secondary BM Units using metering behind the site Boundary Point	Flexitricity	10 Dec 2018	No						
P376	Utilising a Baselining Methodology to set Physical Notifications for Settlement of Applicable Balancing Services	Enel Trade S.P.A.	11 Dec 2018	No			AR	DMR FMR	AI	
P379	Multiple Suppliers through Meter Splitting	New Anglia Energy	3 January 2019	No						
P382	Amendments to the BSC in the event of no-deal Brexit	National Grid ESO	4 March 2019	No		DMR FMR	AI			

Mod	Title	Proposer	Date Raised	Urgent	Sep	Oct	Nov	Dec	Jan	Feb
P383	Enhanced reporting of demand data to the NETSO to facilitate CUSC Modifications CMP280 and CMP281	Innogy	6 March 2019	No	DMR FMR	AI				
P384	The publication of European Electricity Balancing Guideline (EB GL) balancing data by BMRS	National Grid ESO	6 March 2019	No	AI			I		
P385	Improving the efficacy and efficiency of Section H Default provisions	British Gas	3 April 2019	No	AR	DMR FMR	AI			
P386	Corrections and clarifications to the P344 'Project TERRE' legal text	ELEXON	7 May 2019	No			I			
P387	Allowing email communications for the BSC Panel Elections process	BSC Panel	9 May 2019	No			I			

Mod	Title	Proposer	Date Raised	Urgent	Sep	Oct	Nov	Dec	Jan	Feb
P388	Aligning the P344 and P354 Solutions	NETSO	3 July 2019	No	AI					
P389	Resolution of Capacity Market and Balancing Mechanism registration conflicts	Green Frog Power	1 August 2019	No	DMR FMR	AI	I			
P390	Allowing extensions to ELEXON's business and activities, subject to additional conditions	E.ON	12 August 2019	No	IWA				APC	RC

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

СР	Title	Proposer	Date Raised	Sep	Oct	Nov	Dec	Jan	Feb
CP1516	New Interconnector Fuel Type Categories: ElecLink & IFA2	National Grid	7 March 2019	AI		I			
CP1517	Changes to BSC Configurable Items for the TERRE Final Implementation Date	ELEXON	17 May 2019	AI					
CP1518	Housekeeping change to address errors in the approved changes to BSCP514 for CP1515	ELEXON	23 May 2019	AI		I			
CP1519	Treatment of Low Capacity Connections for Site Specific Line Loss Factor Calculations	UK Power Networks	16 July 2019	FR	FR	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>

СР	Title	Proposer	Date Raised	Sep	Oct	Nov	Dec	Jan	Feb
CP1520	Clarification to 'Change of Ownership' process in BSCP537	ELEXON	8 August 2019	РР	CPC	FR	I		
CP1521	BSCP70 Amendments for IA and IEA	ELEXON	27 August 2019	РР	CPC	FR	FR	AI	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.

	November 2019 BSC Release - 7 November 2019						
Change Number	Title of Change	BSC Central Systems/Do cument only impacts	Ofgem/BSC Panel/Panel Committee Approval Status				
P386	Corrections and Clarifications to the P344 legal text	Document	Panel Approved - 13 June 2019				
P387	Allowing email communications for the BSC Panel Elections process	Document	Panel Approved - 13 June 2019				
P389	Resolution of Capacity Market and P389 Balancing Mechanism registration conflicts		Pending				

Standalone Release - 30 November 2019						
Change Number	Title of Change	BSC Central Systems/Do cument only impacts	Ofgem/BSC Panel/Panel Committee Approval Status			
CP1516	New Interconnector Fuel Type Categories: ElecLink & IFA2	System	confirmed			

Ad hoc Release - 18 December 2019						
Change Number	Title of Change	BSC Central Systems/Do cument only impacts	Ofgem/BSC Panel/Panel Committee Approval Status			
P384	The publication of European Electricity Balancing Guideline (EB GL) balancing data by BMRS	System	confirmed			
84-A	Clarification of ownership process in BSCP537	Document	Pending			

Modification Trend Charts

Standalone Release - 1 April 2020 effective, release Feb 20					
Change Title of Change Number		BSC Central Systems/Do cument only impacts	Ofgem/BSC Panel/Panel Committee Approval Status		
P354	Use of ABSVD for non-BM Balancing Services at the metered (MPAN) level	System	Confirmed		

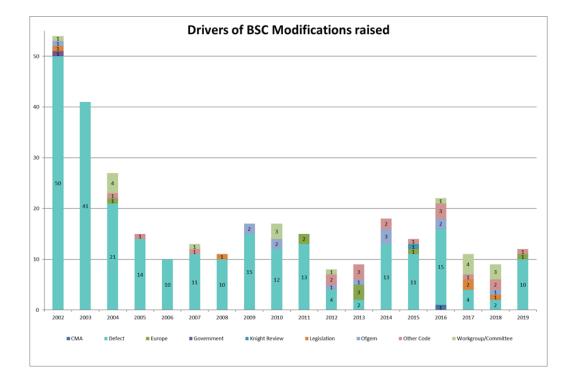
Standalo Change Number	ne Release - P344 Final Imp Title of Change	BSC Central Systems/Do cument only	Ofgem/BSC Panel/Panel Committee
CP1517	Changes to BSC Configurable Items for the TERRE Final Implementation Date	impacts Document	Approval Status

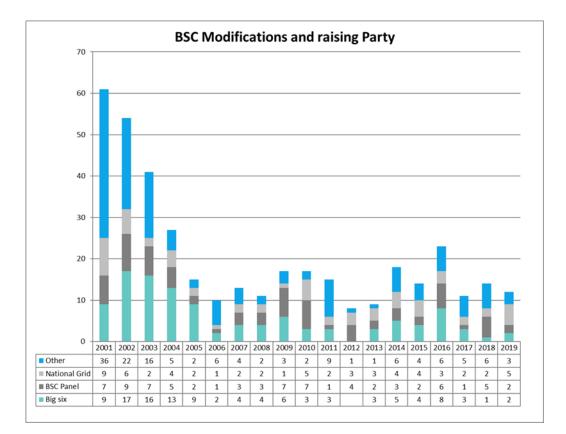
February 2020 BSC Release - 27 February 2020					
Change Number	Title of Change	BSC Central Systems/Document only impacts	Ofgem/BSC Panel/Panel Committee Approval Status		
CP1519	Treatment of Low Capacity Connections for Site Specific Calculations in relation to BSCP128	Document	pending		
CP1521	BSCP70 Amendments for Interconnecto rs	Document	Not yet issued		

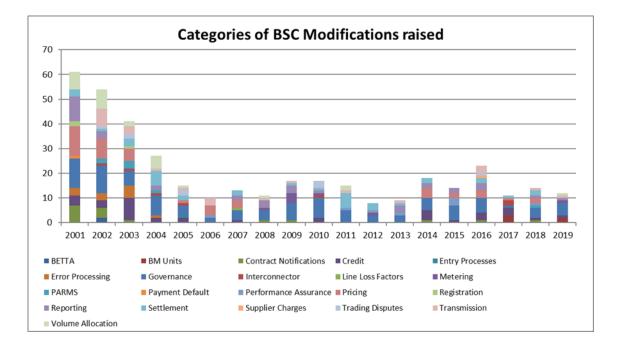
Modification Trend Charts

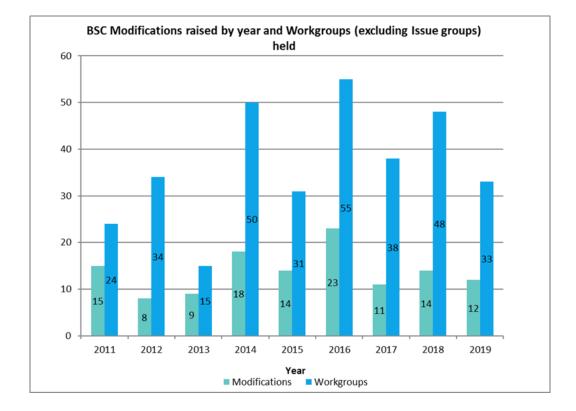
Change Number	Ad-hoc R Title of Change			Implementat ion date
P382	Amendments to the BSC to reflect the United Kingdom's withdrawal from the European Union without a deal	Document	Pending	16 WD from Panel approval - planned for 1 Nov 19
P383	Enabling the aggregation of storage Metering Systes for network charging	System	Pending	01 Apr 21
P374	Aligning the BSC with the EB GL change process and derogation approach	Document	Pending	5 WDs after Authority decision

TBC Release Date						
Change Number	Title of Change	BSC Central Systems/Document only impacts	Ofgem/BSC Panel/Panel Committee Approval Status			
P332	Revisions to the Supplier Hub Principle	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			
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			
P388	Aligning the P344 and P354 Solutions	System	Self Gof window closes 30 aug 19			
P390	Allowing extensions to ELEXON's business and activities, subject to additional conditions'	Document	Pending			









42

