

P420 'Retail Code Consolidation Significant Code Review'

This Modification makes the necessary changes to reflect the effective closedown of the Master Registration Agreement (MRA) and the transition of Supplier Volume Allocation (SVA) Metering arrangements from the Balancing and Settlement Code (BSC) to the Retail Energy Code (REC), as part of the Retail Code Consolidation Significant Code Review (SCR). It also inserts the required drafting to give effect to the new Cross Code Steering Group (CCSG) and cross-code modification arrangements, as part of the SCR.



This is an Authority Led SCR Modification. It did not follow the standard Modification Procedures. Instead it followed the timetable set by the Authority and the Authority Led SCR Modification Proposal procedure detailed in BSC Section F5.3A.



The BSC Panel recommends **approval** of P420



The BSC Panel **does** believe P420 impacts the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC

This Modification is expected to impact:

- Distributors
- Suppliers
- SVA MOAs
- Elxon

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Phase

Draft Report

Consultation

Final Report

Implementation

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About This Document



Not sure where to start? We suggest reading the following sections:

- Have 5 mins? Read section 1
- Have 15 mins? Read sections 1, 7 and 8
- Have 30 mins? Read all sections
- Have longer? Read all sections and the annexes and attachments

This is the P420 Final Authority Led SCR Modification Report, which Elexon will present to the Panel at its meeting on 8 July 2021. It includes the responses received to the Panel's consultation on its initial recommendations. The Panel will consider all consultation responses and will agree a final recommendation to the Authority on whether or not the change should be made.

An Authority Led SCR Modification Proposal does not follow the standard Modification Procedures. Instead it will follow the timetable set by the Authority and the Authority Led SCR Modification Proposal procedure detailed in [BSC Section F5.3A](#).

There are four parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits/drawbacks and proposed implementation approach.
- Attachment A contains the Authority Led SCR Modification Proposal form.
- Attachment B contains the approved redlined changes to the BSC and its subsidiary documents for P420.
- Attachment C contains the full responses to the Authority Led SCR Modification Consultation.

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Why Change?

P420 is required to ensure the BSC aligns with Ofgem's Retail Code Consolidation Significant Code Review, which consolidates a number of existing codes into the Retail Energy Code (REC). The proposed changes have a direct impact on the BSC in terms of the transfer of the Supplier Volume Allocation (SVA) Metering arrangements from the BSC to the REC and cross-code change procedures, as well as consequential changes reflecting the close down of the Master Registration Agreement (MRA).

Solution

P420 makes the necessary changes to reflect the code governance changes implemented through the Retail Code Consolidation SCR. Specifically, it will:

1. Ensure the BSC reflects the close down of the MRA.
2. Transfer operational procedures relating to Metering Point Lifecycle from the MRA to the BSC.
3. Make the necessary changes to transfer SVA Metering arrangements to the REC, and facilitate a transition period for metering assurance.
4. Insert the required drafting to give effect to the Cross Code Steering Group, which will be established under the REC to better facilitate cross-code change.

Impacts & Costs

Costs Estimates			
Organisation	Implementation (£k)	On-going (£k)	Impacts
Ellexon	£85k-£95k	<£1k a month	Update to BSC documents and internal processes. Update to documents and ongoing support to transition Assurance activities from BSC to REC. Support REC PAB and CCSG.
Industry	N/A	N/A	Impacts are as a result from the Ofgem SCR rather than P420 specifically
Total	£85k-£95k	<£1k	

Implementation

P420 should be implemented at the point of Retail Code Consolidation, which will occur at a time designated by the Authority in accordance with the Retail Energy Code. This is planned to be **1 September 2021**.

Recommendation

We invite the Panel to:

- **AGREE** with the evaluation of the Authority Led SCR Modification Proposal as detailed in this report;

- **AGREE** that P420:
 - **DOES** better facilitate Applicable BSC Objective (d);
- **AGREE** that P420 **DOES** impact the EBGL Article 18 terms and conditions held within the BSC and must therefore be submitted to Ofgem for decision;
- **AGREE** the impact on the EBGL objectives;
- **AGREE** that P420 should be **approved**;
- **AGREE** an Implementation Date of:
 - 1 September 2021; and
- **AGREE** the redlined text.



Retail Code Consolidation Significant Code Review: Authority Led SCR Modification Proposal

Ofgem issued an [open letter](#) on 30 April 2021 confirming their requirements to rationalise retail energy codes by closing down the electricity Master Registration Agreement (MRA), gas Supply Point Administration Agreement (SPAA), the Smart Meter Installation Code of Practice (SMICOP), and Green Deal Arrangements Agreement (GDAA). The requirements from these codes will be consolidated into the Retail Energy Code (REC) or transferred to another industry code where this is more relevant.

The REC will also bring together gas and the SVA elements of electricity metering arrangements, consolidating the Meter Operation Code of Practice Agreement (MOCOPA) and parts of the Balancing and Settlement Code (BSC), together with the metering provisions that sit under the SPAA (Metering Code of Practice (MCoP); formerly Meter Asset Manager Code of Practice, (MAMCoP) and Approved Meter Installer Code of Practice (AMICoP)). Central Volume Allocation (CVA) Metering arrangements have not been included as these are not impacted by the Switching SCR.

The Retail Code Consolidation SCR scope also covers improvements to cross code change management. This is due to be achieved through the introduction of a Cross Code Steering Group (CCSG) under the REC, and modifications to the other relevant codes to embed a new process for managing cross-code changes.

As a result of the Significant Code Review, P420 is being raised to ensure the relevant sections of the BSC and Code Subsidiary Documents (CSDs) are transferred from the BSC to the REC.

Proposer Rationale

The energy code landscape is complex and fragmented. This makes the industry difficult for market participants to understand and navigate and complicates significant change processes. Code consolidation and simplification is an overall goal that Ofgem has been pursuing for some years. At a broad level this is being taken forward by the Department for Business, Energy & Industrial Strategy (BEIS) and Ofgem in the Energy Codes Review. However, the creation of the Retail Energy Code as a dual fuel retail code to support the introduction of faster and more reliable switching through a centralised switching service provided the opportunity to simplify the retail code landscape.

Ofgem believes that retail code consolidation will make it easier for market participants to understand and comply with their responsibilities.

The introduction of the Retail Energy Code has also allowed Ofgem to implement code governance and management reforms that they believe will lead to more efficient management and delivery of change, and will ensure that the code supports innovation and considers consumer interests. These changes will lead to lower cost and better outcomes for consumers.

Ofgem launched the Retail Code Consolidation Significant Code Review (SCR) in November 2019. This set out Ofgem's intention to consolidate the MRA and Supply Point Administration Agreement (SPAA) into the Retail Energy Code (REC), to further consolidate a number of metering codes and the Green Deal provisions in the REC and to make consequential changes to other codes.

What is an Authority Led SCR Modification Proposal?

An Authority Led SCR Modification Proposal is one of three routes available to the Authority for giving effect to a SCR. The Authority can direct NGEESO to raise a Modification Proposal, it can raise a Modification Proposal itself or follow a process that is substantially non-BSC to direct changes to the BSC, as is the case with P420. Changes to the BSC can also be made where legislation grants powers to do so. For example, the [changes to the BSC to facilitate the Government's Electricity Market Reform](#) were directed by the Department of Energy and Climate Change, from powers granted under legislation.

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The Retail Code Consolidation SCR also set out to improve cross-code change management. Most recently, Ofgem confirmed that the SCR will also move SVA metering requirements and assurance to the REC.

Desired outcomes

The desired outcome of P420 is to ensure the BSC is aligned with the wider codes landscape from 1 September 2021, when Retail Code Consolidation will take effect. This modification will ensure the BSC reflects:

- The close down of the MRA, meaning Suppliers and network operators will no longer be required to be parties to the MRA;
- The transition of provisions from MRA to REC;
- The introduction of Metering Equipment Managers (MEMs) as Parties to the REC, and consolidation of metering provisions in the REC; and
- The introduction of improved cross-code change governance arrangements.



What is a Metering Equipment Manager?

The REC defines Metering Equipment Manager (MEM), as applicable, either: (a) for electricity, the 'Meter Operator Agent' appointed by an Electricity Supplier under the BSC; or (b) for gas, the 'Meter Asset Manager' appointed by the Gas Supplier under the SPAA.

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Proposed solution

P420 makes the necessary changes to reflect the code governance changes implemented through the Retail Code Consolidation SCR. Specifically, it will:

1. Ensure the BSC reflects the close down of the MRA.
2. Transfer operational procedures relating to Metering Point Lifecycle from the MRA to the BSC.
3. Make the necessary changes to transfer SVA Metering arrangements to the REC, and facilitate a transition period for metering assurance.
4. Insert the required drafting to give effect to the Cross Code Steering Group, which will be established under the REC to better facilitate cross-code change.

Closedown of MRA

The Retail Code Consolidation SCR [Launch Statement](#) set out that the creation of the REC presented an opportunity to consolidate a number of codes in the retail energy space and to create code governance arrangements that drive innovation and positive outcomes for consumers.

Ofgem has designed the REC to have a change management approach and organisational structures that will allow it to be more flexible and responsive in decision-making, more open to innovation and challenge from any party, and governed by a more diverse set of interests than is the case in the currently existing code governance arrangements.

Retail Code Consolidation will see the closure of the MRA, SPAA, GDAA, SMICoP, and MOCOPA, with the vast majority of the provisions from these documents being transferred to the REC. Therefore, many of the references to the MRA in other existing codes, including the BSC, must be updated to refer to the REC, in order for those codes to continue to function efficiently.

Transition of SVA metering obligations and assurance to REC

The Retail Code Consolidation SCR Launch Statement confirmed Ofgem's high-level intention to consolidate metering arrangements in the REC. Ofgem's overarching policy intent is to harmonise gas and electricity metering provisions within the REC, providing a single set of obligations directly on MEMs with a robust performance assurance framework that holds MEMs directly to account.

While the BSC has existing assurance regimes applicable to metering arrangements, the liabilities lie with suppliers, rather than the metering agents themselves, under the 'supplier hub' model. Ofgem considers that it is preferable and beneficial to the wider market to place any liabilities as closely as possible on the organisations who are responsible for a given activity, i.e. placing liabilities on MEMs for their performance around maintaining meter technical details. As MEMs will be parties to the REC in their own right, they will also be subject to the Performance Assurance function under the REC. This means that the REC Performance Assurance Board (PAB) will be able to directly assure MEM activity, rather than being reliant on incentives in the commercial contracts between suppliers and MEMs to sufficiently incentivise good performance.

Ofgem has worked closely with Elexon and RECCo to determine a robust approach to the transfer of provisions and assurance activity from the BSC to the REC. First, on the legal drafting, the BSC drafting has been prepared ahead of the finalisation of the REC legal text. This means that the REC drafting can be updated to ensure all provisions that are leaving the BSC are captured in the REC, ahead of the REC drafting being baselined in mid-June. Second, regarding transfer of assurance activity, this modification proposal makes provision for a transition period in which Elexon and RECCo will develop a transition plan for metering assurance, and progress any necessary changes to the codes to facilitate this plan. Ofgem anticipates that SVA metering assurance would complete its transition to REC by April 2022 (although this is not prescribed in the proposed legal drafting and is subject to further planning of the transition by Elexon and RECCo, with particular consideration of the timelines for [BSC Issue 93 'Review of the BSC metering Codes of Practice'](#)).

In summary, the proposed changes to SVA metering governance and assurance will ensure that SVA MEMs have a single set of obligations placed on them, and that they can be held directly to account for their performance against those obligations. Although the risks associated with metering agents and accuracy of meter technical details are ultimately risks to Settlement (and therefore have until now been assured under the BSC), Ofgem considers that these risks are ultimately best mitigated by direct assurance on MEMs, which will be facilitated under the REC Performance Assurance Framework.

Cross Code Steering Group

P420 includes the necessary changes to Section F of the BSC to implement improved cross-code change arrangements. Notwithstanding the consolidation of codes being undertaken as part of the RCC, Ofgem expects that there will still be a need for effective management of changes that impact upon more than one code. It should be noted that these cross code arrangements apply only to the codes within scope of the SCR, namely the BSC, REC, Distribution Connection and Use of System Agreement (DCUSA), SEC, UNC and IGT INC.

Changes to data items/flows

In particular, the REC Technical Specification includes provisions that impact on the operation of other industry codes. For example, the REC will host the Data Item and Message Catalogues. The scope of these catalogues includes the data items and messages required under DCUSA, SEC, UNC and Independent Gas Transporters (IGT) INC. As a result of these changes some BSC SVA data items have also moved to the REC, as outlined in the redlining in Attachment B. The REC Code Manager will be responsible for publishing these catalogues and implementing updates. However, it is important to ensure that the overall governance framework places responsibility and control over the actual metadata held within the Data Specification on the relevant organisations that create and/or use it, and the codes that manage the related processes. Other examples include the close working required by the REC Code Manager and the BSC Code Manager on entry assessment.

Historically the MRA's relationship with the BSC Agent has been codified through the BSC Agent having a seat on the MRA Executive Committee. Other cross-code coordination efforts have relied on ad hoc voluntary coordination between the various code administrators, in accordance with CACoP principle 13: 'Code Administrators will ensure

cross Code coordination to progress changes efficiently where modifications impact multiple Codes'. This results of this have been mixed.

Cross code changes

To address this, as part of the Retail Code Consolidation SCR, Ofgem will establish under the REC a Cross Code Steering Group (CCSG) and create an enduring governance framework to enable robust cross code working, including on the assessment and development of changes that impact upon two or more industry codes. The principles and practices of the CCSG and the operational procedures for cross-code change will be set out in the CCSG Terms of Reference (ToR), a document to be governed in accordance with the REC Change Management process. Any code administrator may raise a REC change to propose enhancements to the CCSG practices or processes if they wished to do so.

In summary, where a proposed change is likely to require a consequential change or update to another code, the change will be considered by the CCSG. If the CCSG agrees that a consequential change is needed, it will designate a **lead** change, and one or more **consequential** changes. The changes will then proceed through their respective development phases in accordance with their code rules, and in accordance with the timetable set out by the lead code. This ensures equally that the consequential change cannot be implemented before the lead change (as has occurred in the past), and that development of the consequential change cannot hold up the lead change unnecessarily.

Ofgem also proposes to enable the code administrator/manager of each code to raise consequential changes to their respective codes, where those changes have been agreed at the CCSG. This will reduce the dependence and burden upon individual code parties to facilitate this cross code working. The REC does not have any restriction on who can raise a change proposal, so any code administrator could raise a REC change if necessary. Ofgem proposes there should be a reciprocal ability for the REC Code Manager to raise consequential changes to the other codes, where necessary, for example if the code administrator does not have the resource capacity to do so. These modification-raising rights have been inserted to Section F. This should help to make cross-code change processes easier to manage. This means that **BSCCo will have powers to raise modifications to the BSC**, where the CCSG decides that a Consequential BSC change is required.

Each code will then include legal drafting to embed the CCSG and the decision making rules and rights for both the 'lead' code and any 'consequentially-impacted' codes.

Ofgem has set out its decision on the design of the cross-code change arrangements in its [Decision on the REC v2 and Retail Code Consolidation consultation](#). This is replicated below.

Design of the cross-code decision making process

We propose that each modification within a cross code change package should be voted on by the relevant panel. However, implementation of each change in the package [ie lead change plus any consequential changes] would be conditional on the approval of all modifications within the package, and this conditionality should be clearly set out in the change proposal.

Where all changes within a package are self-governance modifications:

- a) *If every code votes to approve their respective modification, then the whole package is approved and all modifications can be implemented.*

- b) *If the **lead** change is approved by its respective code, but one or more **consequential** changes are rejected, the lead code panel can choose to refer the decision on all changes in the package (lead and consequential) to the Authority within 30 days of the vote on the lead change. This 30 day window allows for any self-governance appeal routes to close before the Authority receives the package for decision.*
- c) *If the **lead** change is rejected by its respective code, then none of the **consequential** changes can be implemented regardless of whether they are or would have been approved by their respective codes (subject to any appeal of the decision of the lead code).*
- d) *If all changes within a package are approved, but one of the modifications is subsequently successfully appealed, the other related changes should not be implemented or their implementation should be reversed.*

Where a cross-code change package consists of a mixture of self-governance and Authority decision modifications, we consider that the lead change should always be one of the changes that requires an Authority decision. This means that if any of the consequential changes are rejected, they can be referred to the Authority for decision at the same time as the decision on the lead change.

In summary, the changes proposed to Section F of the BSC will embed the required processes to ensure that BSC Parties can benefit from improved cross code change.

Changes to Elexon Raising a Modification

Section F has been amended to allow BSCCo to raise a Modification Proposal, where the CCSG has designated that proposal as a Consequential Modification.

In this scenario, BSCCo would either need to assign:

1. a BSCCo employee as its representative, in which the Workgroup would own the solution (and not Elexon as the Proposer's representative in accordance with F2.4.5C); or
2. a non-BSCCo employee as its representative, in which case the 'normal' Proposer ownership rules would apply.

Legal text

Elexon have provided redlining for 64 documents as per Attachment B, with 15 BSC sections impacted and 49 Code Subsidiary Documents (CSDs).

A portion of the documentation was sent to Ofgem initially in April 2020 and was issued by Ofgem for industry consultation in December 2020. Documentation has subsequently been updated based on Industry feedback and applied to the latest versions of the documentation.

A second round of changes has been drafted based on Ofgem's updated direction that SVA Metering and Assurance techniques will be transferred to the REC, as well as updated CCSG arrangements. These changes have not been consulted on before by Ofgem but were included in the Panel consultation for P420.

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A number of changes are recommend to the P420 legal text in response to the consultation and following further rounds of reviews, which were not previously possible to meet the timeline set by Ofgem. These are detailed in Appendix 2.

EBGL Impacts

Within the redlining there are 16 clauses, within 7 documents, that have an impact on the EBGL Article 18 balancing terms and conditions within the BSC. Due to this the redlining was issued for a one month industry consultation and falls within the 'EBGL change process'.

BSC Section	Clauses Impacted
Section A	5.1.3 (d)
Section H	4.2.3 (f) (iv)
Section J	3.3, 3.3.9
Section K	1.2.2 (b) (iv), 2.2.1, 2.2.4 (c), 2.4.5, 2.4.6, 2.5.5
Section O	1.1.1, 1.2.1, 1.4
Section U	1.2.3 (a), 1.6
Section Z	All Changes

EBGL Objectives

Impact of the Modification on the Relevant EBGL Objectives:	
Relevant Objective	Identified impact
(a) Fostering effective competition, non-discrimination and transparency in balancing markets;	Neutral
(b) enhancing efficiency of balancing as well as efficiency of European and national balancing markets;	Neutral
(c) integrating balancing markets and promoting the possibilities for exchanges of balancing services while contributing to operational security;	Neutral
(d) contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union while facilitating the efficient and consistent functioning of day-ahead, intraday and balancing markets;	Neutral
(e) ensuring that the procurement of balancing services is fair, objective, transparent and market-based, avoids undue barriers to entry for new entrants, fosters the liquidity of balancing markets while preventing undue distortions within the internal market in electricity;	Neutral
(f) facilitating the participation of demand response including aggregation facilities and energy storage while ensuring they compete with other balancing services at a level playing field and, where necessary, act independently when serving a single demand facility;	Neutral

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(g) facilitating the participation of renewable energy sources and support the achievement of the European Union target for the penetration of renewable generation.	Neutral
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The EBGL changes identified are mainly references due to nature of the proposed Modification i.e. amendment of MRA references to REC and movement of Metering activities from BSC to REC. These amendments are not amending the obligations and as such not materially impacting the Article 18 terms and conditions. Ellexon and the Panel therefore believe all objectives have a neutral impact, but a one month consultation period is required as per the EBGL Article 18 terms and conditions change process.

Approved Change Proposals and Modification

As a result of the changes put forward by P420, there are a number of approved Change Proposals and Modifications that will require their solutions to be amended due to the obligations in their respective redlining solutions being changed or moved to the REC. Ellexon will discuss these with the relevant committees and amend the solutions where appropriate following the appropriate governance procedures. This includes [P375 'Settlement of Secondary BM Units using metering behind the site Boundary Point'](#) where the approved legal text will require a new Modification to align to the P420 changes and [CP1532 'Reduce Half Hourly Change of Supplier timelines to meet the Initial Settlement Run'](#) where BSCP514 will have been removed from circulation.

4 Applicable BSC Objectives

Impact of the Modification on the Relevant Objectives:	
Relevant Objective	Identified impact
a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence	Neutral
(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System	Neutral
(c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity	Neutral
(d) Promoting efficiency in the implementation of the balancing and settlement arrangements	Positive
(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]	Neutral
(f) Implementing and administering the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation	Neutral
(g) Compliance with the Transmission Losses Principle	Neutral

Ofgem and the Panel believe this modification will positively facilitate Applicable BSC Objective (d) and is neutral on all other Relevant Objectives. The positive impact on Objective (d) is, in summary, because:

- It would be inefficient for the balancing and settlement arrangements to refer to obsolete code documents and arrangements (i.e. the MRA);
- Directly assuring MEM activity is a more efficient mitigation of Settlement Risk, rather than doing this via Suppliers; and
- Improved cross-code change, particularly ensuring aligned timelines for cross-code changes, will improve the efficient operation of the energy market, including Balancing and Settlement arrangements.

Impacts and costs overview

Due to the nature of the Authority Led SCR Modification process no formal Impact Assessment has been issued. Ofgem have most recently consulted on its policy changes in [December 2020 and published its policy decisions in April 2021](#).

The initial implementation costs for Elexon are document only changes to update 64 documents to deliver the solution.

We believe the P420 impact on Elexon's process changes will not incur additional costs or workload compared to the current baseline. Any additional processes required to be picked up by Elexon resource is anticipated to be evened out by processes that have been transferred to the REC. There will however be transitional costs to continue to move Assurance activities to the REC.

It is anticipated that there will need to be some 'tidy up' changes following the end of the transition period. Any future changes to process will be raised via separate Modifications or Change Proposals and as such will incur costs directly as opposed to being linked to P420.

Estimated central implementation costs of P420

Direct costs of Implementation for Elexon are restricted to document only changes.

Implementation cost estimates			
Organisation	Item	Implementation (£k)	Comment
Elexon	Systems	N/A	
	Documents	£20k-£25k	Cost of Elexon updating 64 documents
	Other	£65k-£70k	Elexon are required to provide additional ongoing support to transition Assurance activities from BSC to REC, this is considered to be approximately 0.75 FTE for the period April 2021 – April 2022.
Industry	Systems & processes	N/A	Impacts would be as a result from Ofgem SCR rather than P420
Total		£85k-£95k	

Ofgem have highlighted the requirement for Elexon's PARMS systems to be updated as part of their proposal form. At this stage this will be considered as part of the assurance transition between the REC Manager and Elexon. It will be important to understand how Metering performance is managed and monitored under the REC, given the impact MEMs may have on Settlement Risks.

Estimated on-going costs of P420

On-going cost estimates		
Organisation	On-going (£k)	Comment
Elexon	<£1k a month	Resource will be required to attend the REC PAB and potentially Metering steering group although any work done in this area is considered to be an evolution of Risks and/or Techniques and part of business as usual activities as opposed to direct costs as a result of P420. These costs will be picked up with existing Elexon resource. Further, Elexon will be required to attend the CCSG, estimated to be one day's effort per month. There will also be increased costs where Elexon raises consequential Modifications, where it would not have previously done so. In practice, we expect any costs differences to be minimal as Elexon currently supports Parties with consequential changes and attends other code's workgroups, as needed.
Industry	N/A	Impacts would be as a result from Ofgem SCR rather than P420
Total	<£1k	

P420 impacts

Impact on BSC Parties and Party Agents		
Party/Party Agent	Impact	Estimated impact
Distributors	Distributor interactions with MOA will sit under the REC as opposed to the BSC	L
Suppliers	Elexon engagement with MOAs likely to be via Suppliers rather than directly	L
SVA MOA	Obligations haven't changed but governed under a new code	M

Impact on the NETSO	
Impact	Estimated cost
No impact	N/A

Impact on BSCCo		
Area of Elexon	Impact	Estimated cost
Metering and Assurance	Change in process management	H
Rules Management	CCSG changes could lead to increased costs where BSCCo is expected to be the Lead Code for consequential changes.	L

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Impact on BSC Settlement Risks

No direct impact on BSC Settlement Risks, although moving obligations to the REC may impact the way Settlement risks are addressed as they may require BSC PAB to liaise with the REC PAB to hold underperforming MOAs to account. The BSC PAB can still hold Suppliers to account for the quality of data provided by their Agents.

Impact on BSC Systems and process

BSC System/Process	Impact
No impact	No impact

Impact on BSC Agent/service provider contractual arrangements

BSC Agent/service provider contract	Impact
No impact	No impact

Impact on Code

Code Section	Impact
Section A Section B Section C Section F Section H Section J Section K Section L Section O Section S Section U Section W Section X Section X - ANNEX X-1 Section Z	Updates made to all documents to reflect obligations moving out of the BSC and into REC, including the closedown of MRA.

Impact on EBGL Article 18 terms and conditions and objectives

Within the redlining there are 16 clauses, within 7 documents, that amend the EBGL provisions. However, we believe these amendments do not materially amend the EBGL Article 18 conditions, as P420 is moving the obligations, not amending them.

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Impact on Code Subsidiary Documents	
CSD	Impact
BSCP01 BSCP11 BSCP27 BSCP32 BSCP40 BSCP65 BSCP68 BSCP128 BSCP128 Appendix 3 BSCP128 Appendix 4 BSCP128 Appendix 10 BSCP201 BSCP501 BSCP502 BSCP503 BSCP504 BSCP508 BSCP509 BSCP509 Appendix 2 BSCP510 BSCP513 BSCP514 BSCP515 BSCP533 BSCP533 Appendix A BSCP533 Appendix B BSCP535 BSCP537 BSCP538 BSCP550 BSCP601 PSL100 SAD Code Subsidiary Documents Architectural Principles SVA Data Catalogue Volume 1: Data Interfaces SVA Data Catalogue Volume 2: Data Items NETA Programme, Interface Definition and Design: Part 1 - Interfaces with BSC Parties and their Agents COP_2 COP_3 COP_4 COP_5 COP_6 COP_7 COP_8 COP_9 COP_10 PROFILE ADMIN SD CRA URS PARMS URS	Updates made to all documents to reflect obligations moving out of the BSC and into REC, including the closedown of MRA.

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Impact on other Configurable Items	
Configurable Item	Impact
No impact	No impact

Impact on Core Industry Documents and other documents	
Document	Impact
Ancillary Services Agreements	No impact
Connection and Use of System Code	
Data Transfer Services Agreement	Changes to the Data Transfer Services Agreement to deliver the RCC SCR require consequential changes to the BSC
Distribution Code	No impact
Distribution Connection and Use of System Agreement	
Grid Code	
Master Registration Agreement	Changes to the MRA to deliver the RCC SCR require consequential changes to the BSC
Retail Energy Code	Obligations are being moved from the BSC to the REC.
Supplemental Agreements	No impact
System Operator-Transmission Owner Code	
Transmission Licence	
Use of Interconnector Agreement	

Impact on a Significant Code Review (SCR) or other significant industry change projects
This Authority-led Modification is raised pursuant to the Retail Code Consolidation SCR.

Impact of the Modification on the environment and consumer benefit areas:	
Consumer benefit area	Identified impact
1) Improved safety and reliability	Neutral
2) Lower bills than would otherwise be the case	Positive
3) Reduced environmental damage	Neutral
4) Improved quality of service	Positive
5) Benefits for society as a whole	Positive



What are the consumer benefit areas?

1) Will this change mean that the energy system can operate more safely and reliably now and in the future in a way that benefits end consumers?

2) Will this change lower consumers' bills by controlling, reducing, and optimising spend, for example on balancing and operating the system?

3) Will this proposal support:

- i) new providers and technologies?
- ii) a move to hydrogen or lower greenhouse gases?
- iii) the journey toward statutory net-zero targets?

iv) decarbonisation?

4) Will this change improve the quality of service for some or all end consumers. Improved service quality ultimately benefits the end consumer due to interactions in the value chains across the industry being more seamless, efficient and effective.

5) Are there any other identified changes to society, such as jobs or the economy.

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Ofgem have highlighted three areas as having benefits within the wider RCC SCR as a whole as opposed to directly having an impact on the consequential changes made by the BSC.

Lower bills than would otherwise be the case

Ofgem anticipates that retail code consolidation will lead to lower costs for industry and therefore for consumers.

Improved quality of service

Ofgem anticipates that retail code consolidation will lead to more effective management of retail industry processes and improved performance assurance. This should lead to improved experiences for consumers.

Benefits for society as a whole

Ofgem believes that the code management and governance changes from retail code consolidation will lead to easier, quicker and less costly change, supporting innovation that will bring benefits across the economy.

Implementation Approach

Ofgem has set out its intention to issue its decision to implement REC v2.0 and issue its decisions in relation to the consequential changes to other codes under the Retail Code Consolidation SCR on 2 July 2021, to take effect from 1 September 2021.

In the case of P420, Ofgem adjusted its views on the timeline to provide for a one month consultation in relation to the EBGL provisions as advised by Elexon. The timeline directed for this modification allowed for that consultation while still meeting the 1 September 2021 intended implementation date.

Recommended Implementation Date

P420 should be implemented at the point of Retail Code Consolidation, which will occur at a time designated by the Authority in accordance with the Retail Energy Code. This is planned to be 1 September 2021. The Panel therefore recommended P420 is implemented on **1 September 2021**.

7 Panel's Initial Discussions

The P420 Draft Authority Led SCR Modification report was presented to the Panel at its [meeting on 13 May 2021](#).

The Panel unanimously agreed with Ofgem's opinion that P420 better facilitates Applicable BSC Objective (d) and the evaluation of the Modification Proposal. All other recommendations were agreed.

In response to clarification questions from Panel Members Elexon confirmed:

- The redlining had previously been consulted on by Ofgem last year, following its development under [Issue 86](#) 'Review of processes potentially impacted by Ofgem's Faster Switching Programme', except for the Meter Operator Agent and cross code working changes.
- The definition of Energy Codes had been updated to the meaning for that term in the CCSG Terms of Reference, which is deliberately limited to the BSC, REC, DCUSA, UNC and IGT INC. The CCSG would not apply to all energy codes, only those within scope of the RCC SCR.

Ofgem also confirmed it believed the one-month consultation was sufficient for industry to respond.

8 Report Phase Consultation Responses

Due to the wide ranging nature of the changes being made by P420, plus the impacts on EBGL Article 18 terms and conditions and objectives a one month Consultation period was issued with the following questions to gain Industry views on the draft redlining.

Summary of P420 Report Phase Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree that the redlined changes to the BSC deliver the intent of P420?	3	2	0	1
Do you agree with the Panel's initial view that P420 does impact the EBGL Article 18 terms and conditions related to balancing held within the BSC?	3	1	1	1
Do you have any comments on the impact of P420 on the EBGL objectives?	0	4	1	1
Do you have any further comments on P420?	4	2	-	-

Overview of Consultation Responses

We received six responses to the Industry Consultation representing Distributors, a Supplier and a Trade Body. The main objectives of the Consultation period was to provide market participants an opportunity to comment on the EBGL objectives and whether the proposed redlining met the intention of P420.

No respondents objected to the Panel's recommendations that P420 does impact EBGL Article 18 terms and conditions related to balancing held within the BSC, noting they were not in a position to comment, or agreed with the initial assessment that the changes were minor.

Redlining Updates

The Consultation also invited Parties to review the redlining, we received a total of 81 comments that have been assessed and updated as per the below table. A full breakdown of redlining feedback can be found in Appendix 2 – including Elexon's rationale for deciding whether to update the documents or not.

The following table outlines all the documents were updated as part of P420, including the clauses we have updated following Industry Consultation feedback. This includes housekeeping changes from Elexon's housekeeping log that we identified following further quality reviews, which were not possible previously, due to the tight timetable set by Ofgem. Housekeeping changes include formatting, reference changes and grammar corrections.

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Document	Title	Clauses Updated following Consultation
SECTION A	Parties and Participation	
SECTION B	The Panel	
SECTION C	BSCCo and its Subsidiaries	
SECTION F	Modification Procedures	1.6A.2 (a) 1.6A.4 2.11.22
SECTION H	General	4.2.3 (f) (iv)
SECTION J	Party Agents and Qualification Under The Code	2.1B.2
SECTION K	Classification and Registration of Metering Systems and BM Units	
SECTION L	Metering	1.2.5
SECTION O	Communications under the Code	
SECTION S	Supplier Volume Allocation	
SECTION U	Provisions Relating to Settlement	
SECTION W	Trading Disputes	1.3. 1.7 5.4.1
SECTION X	Definitions and Interpretations	
SECTION X - ANNEX X-1	General Glossary	SVA MEM
SECTION Z	Performance Assurance	
BSCP01	Overview of Trading Arrangements	1 3.1 HK added
BSCP11	Trading Disputes	
BSCP27	Technical Assurance of Half Hourly Metering Systems for Settlement Purposes	1.2 HK added
BSCP32	Metering Dispensations	Rebaselined to Version 12 HK added
BSCP40	Change Management	
BSCP65	Registration of Parties and Exit Procedures	
BSCP68	Transfer of Registration of Metering Systems between CMRS and SMRS	3.2.1.32

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Document	Title	Clauses Updated following Consultation
BSCP128	Production, Submission, Audit and Approval of Line Loss Factors	3.5
BSCP128 Appendix 3	Calculation Self Assessment Document (CSAD) for Host LDSOs and Embedded LDSOs that do not Mirror	
BSCP128 Appendix 4	Line Loss Factor Calculation Self Assessment Document (CSAD) for Embedded LDSOs that Mirror	
BSCP128 Appendix 10	Calculation Self-Assessment Document (CSAD) for mid-year LLF submissions	
BSCP201	Black Start and Fuel Security Contingency Provisions and Claims Process	HK added
BSCP501	Supplier Meter Registration Service	1.11 3.2.1 4.2.2 Acronyms
BSCP502	Half Hourly Data Collection for SVA Metering Systems Registered in SMRS	Contents footnote HK added
BSCP503	Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS	Acronyms HK added
BSCP504	Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS	1.1 Rebaselined to Version 46
BSCP508	Supplier Volume Allocation Agent	
BSCP509	Changes to Market Domain Data	
BSCP509 Appendix 2	MDD Change Request Entity Validation	
BSCP510	The Provision of Sampling Data to the Profile Administrator	3.2.3 4.5 Acronyms
BSCP513	Bulk Change of NHH Supplier Agent	1.1 HK added
BSCP514	SVA Meter Operations for Metering Systems Registered in SMRS	
BSCP515	Licensed Distribution	3.3 A Rebaselined to Version 18
BSCP533	PARMS Data Provision, Reporting and Publication of Peer Comparison Data	HK added
BSCP533 Appendix A	PARMS Data Provider File Formats	

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Document	Title	Clauses Updated following Consultation
BSCP533 Appendix B	PARMS Calculation Guidelines	Annex B
BSCP535	Technical Assurance	1.9
BSCP537	Qualification Process for SVA Parties, SVA Party Agents and CVA MOAs	1.1
BSCP538	Error and Failure Resolution	HK added
BSCP550	Shared SVA Meter Arrangements of Half Hourly Import and Export Active Energy	1.1 Footnote 3 and 4 HK added
BSCP601	Metering Protocol Approval and Compliance Testing	HK added
PSL100	Generic Non Functional Requirements for Licensed Distribution System Operators and Party Agents	10.1.2 HK added
SAD	Qualification Process for SVA Parties, SVA Party Agents and CVA MOAs	
Code Subsidiary Documents Architectural Principles	Code Subsidiary Documents Architectural Principles	
SVA Data Catalogue Volume 1: Data Interfaces	SVA Data Catalogue Volume 1: Data Interfaces	
SVA Data Catalogue Volume 2: Data Items	SVA Data Catalogue Volume 2: Data Items	
NETA Programme, Interface Definition and Design: Part 1 - Interfaces with BSC Parties and their Agents	NETA Programme, Interface Definition and Design: Part 1 - Interfaces with BSC Parties and their Agents	HK added
COP_2	Code of Practice for the Metering of Circuits with a Rated Capacity Not Exceeding 100MVA for Settlement Purposes	
COP_3	Code of Practice for the Metering of Circuits with a Rated Capacity Not Exceeding 10MVA for Settlement Purposes	HK added
COP_4	Code of Practice for the Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes	HK added
COP_5	Code of Practice for the Metering of Energy Transfers with a Maximum Demand of up to (and Including) 1MW for Settlement Purposes	HK added

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Document	Title	Clauses Updated following Consultation
COP_6	Code of Practice for the Metering of Energy Imports Via Low Voltage Circuits Fused at 100 Amps or Less Per Phase for Settlement Purposes	HK added
COP_7	Code of Practice for the Metering of Energy Imports Via Low Voltage Circuits Fused at 100 Amps or Less Per Phase for Settlement Purposes	HK added
COP_8	Code of Practice for the Metering of Import Active Energy Via Low Voltage Circuits for Non-Half Hourly Settlement Purposes	HK added
COP_9	Code of Practice for the Metering of Import and Export Active Energy Via Low Voltage Circuits for Non-Half Hourly Settlement Purposes	
COP_10	Code of Practice for Whole Current Metering of Energy via Low Voltage Circuits for Settlement Purposes	HK added
PROFILE ADMIN SD	Service Description for Profile Administration	HK added
CRA URS	Central Registration Agent User Requirements Specification	HK added
PARMS URS	PARMS System User Requirements Specification	HK added

We invite the Panel to:

- **AGREE** with the evaluation of the Authority Led SCR Modification Proposal as detailed in this report;
- **AGREE** that P420:
 - **DOES** better facilitate Applicable BSC Objective (d);
- **AGREE** that P420 **DOES** impact the EBGL Article 18 terms and conditions held within the BSC and must therefore be submitted to Ofgem for decision;
- **AGREE** the impact on the EBGL objectives;
- **AGREE** that P420 should be **approved**;
- **AGREE** an Implementation Date of:
 - 1 September 2021; and
- **AGREE** the redlined text.

Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BEIS	Department for Business, Energy & Industrial Strategy
BSC	Balancing & Settlement Code
CCSG	Cross Code Steering Group
CSD	Code Subsidiary Documents
CVA	Central Volume Allocation
DCUSA	Distribution Connection and Use of System Agreement
EBGL	European Electricity Balancing Guideline
GDAA	Green Deal Arrangements Agreement
IGT	Independent Gas Transporters
MEM	Metering Equipment Manager
MOA	Meter Operator Agent
MRA	Master Registration Agreement
PAB	Performance Assurance Board
RCC	Retail Code Consolidation
REC	Retail Energy Code
SAD	Self Assessment Document
SCR	Significant Code Review
SEC	Smart Energy Code
SMICOP	Smart Meter Installation Code of Practice
SPAA	Supply Point Administration Agreement
SVA	Supplier Volume Allocation

External links

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

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

External Links		
Page(s)	Description	URL
2	BSC Section F	https://www.elexon.co.uk/documents/bsc-codes/bsc-sections/bsc-section-f-modification-procedures/

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External Links		
Page(s)	Description	URL
5	RCC Open Letter	https://www.ofgem.gov.uk/system/files/docs/2021/04/open_letter_-_retail_code_consolidation_significant_code_review.pdf
7	SCR Launch Statement	https://www.ofgem.gov.uk/publications-and-updates/retail-code-consolidation-scr-launch-statement
8	Issue 93	https://www.elexon.co.uk/smg-issue/issue-93/
12	Ofgem SCR Decision	https://www.ofgem.gov.uk/publications-and-updates/decision-retail-energy-code-v20-and-retail-code-consolidation-consultation
13	REC v2.0 December Consultation	https://www.ofgem.gov.uk/publications-and-updates/retail-energy-code-v20-and-retail-code-consolidation
14	P375	https://www.elexon.co.uk/mod-proposal/p375/
14	CP1532	https://www.elexon.co.uk/change-proposal/cp1532/
21	BSC Panel 314	https://www.elexon.co.uk/meeting/bsc-panel/

Appendix 2: Industry Consultation Redlining Feedback

Document	Clause	Comment	Update	Logic
BSCP11	1 & 3.1	Clause 1 and Clause 3.1 - why have the MRA references not been replaced with REC? Believe it is still relevant.	Updated	Agree with comment, clause updated.
BSCP11	5.1.3	It would be sensible to allow the BSC to request information directly from the SVA Meter Operator to assist with the investigation and resolution of a Trading Dispute. The existing drafting in 5.1.3 refers to any relevant expert. Having something to explicitly include SVA Meter Operators may more clearly allow the BSC to ask SVA Meter Operators directly. Should have complementary corresponding obligation in the REC to require SVA MOA to respond to these requests. Also, should ensure the MOA gets to hear of the outcome of any dispute that they are involved with	Not Updated	We do not believe MOA being informed of Trading Dispute results is a REC issue. Existing BSC obligations can compel Suppliers to get their MOA to assist. Or practically they can use relevant expert if necessary.
BSCP128	3.5	BSCP128 – Example - Clause 3.5 – should DTC reference be replaced rather than deleted?	Updated	Replaced DTC with EMDS.
BSCP27	1.2	some changes have not been marked as MEM or RCC. Clause 1.20 – is a reference to REC required?	Updated	Agree with comment, clause updated.

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Document	Clause	Comment	Update	Logic
BSCP27	3.4.5	Is the intention to make this part of the Technical Assurance transitional activity? If it is then that should be added into the document early on. 3.4.5 use of the REC Metering Schedule terminology need to be standardised - see comment on BSCP515	Not Updated	The TAA is part of the wider of the PAF assurance activity covered in Section Z. The TAA itself will continue to be operated under the BSC past the Transitional Assurance "deadline" as it related primarily to CoP requirements. It has been agreed with the RPA that the BSC will continue to operate the TAA technique "as is" until such time a decision is made on the CoPs.
BSCP32		Definitions - I think Affected Parties should include CVA and SVA Meter Operators - this may be perceived as a change, but the split of the role into the REC makes it more relevant Need to ensure that a MEM or MAP can apply for a generic Dispensation for certain equipment that may not meet the Metering CoP requirements. This has happened in the past. It may be that the Applicant definition is sufficiently broad to allow anyone but Meter Operators should be explicitly included.	Not Updated	Not within scope of P420.

Document	Clause	Comment	Update	Logic
BSCP40		The BSCP40 (change management) schedule does not include any references or processes relating to the cross code change management process. This is an oversight and needs to be included to reflect the potential issues if a change is raised as a lead proposal or as a secondary change proposal as part of a co-ordinated code change.	Not Updated	CCSG only sets out the process for Modifications which is why BSCP40 has not been updated. CPs can be raised by Elexon and a decision reached within 3 months. We have managed consequential changes to BSC subsidiary documents form other codes (e.g. CUSC/Grid Code) for many years without issue. This can be raised at a later stage if it becomes a problem.
BSCP501	1.11	<p>"MPAS" has been deleted from the defined terms, however, MPAS as a defined term is still in existence within the REC or does this need to change to ERDS (Electricity Registration Data Service) again a defined term in the REC and be included within this BSCP501 "Defined Terms"?</p> <p>Within this BSCP 501 there are still references to "MPAS" under 3.3.5; 3.4.4; 3.5.4 and 3.7.4</p>	Updated	Agree with comment, clause updated.
BSCP501	4.2.2	why has clause been deleted rather than replace by REC?	Updated	Agree with comment, clause updated.
BSCP501	3.2.1	would expect footnote to remain	Updated	Agree with comment, clause updated.

Document	Clause	Comment	Update	Logic
		and point to relevant area of REC or BSC.		
BSCP501	4.2.2	<p>"This section considers erroneous Registrations which are agreed by both Suppliers as being made in error."</p> <p>Where there is a dispute the Suppliers may either use the MRA REC disputes process, or seek redress through legal proceedings</p> <p>Should this deleted text be replaced by referencing the disputes process for erroneous transfers under the REC?</p>	Updated	Agree with comment, clause updated.
BSCP501	Acronyms	needs REC	Updated	Agree with comment, clause updated.
BSCP502	3.3.1.2	3.3.1.2 et al has ref to SVA HH MOA - is it necessary, or can it be regarded as SVA MOA?	Not Updated	Reference to HH/NHH MOA has been left "as is" for CoMC activity to make clearer responsibilities between HH and NHH agents in where a CoMC takes place.
BSCP502	3.3.2.2	does the same with SVA NHH MOA? If these remain they probably need including in the document in the definitions"	Not Updated	Reference to HH/NHH MOA has been left "as is" for CoMC activity to make clearer responsibilities between HH and NHH agents in where a CoMC takes place.
BSCP502	Contents footnote	MRA still there – is that correct?	Updated	Agree with comment, clause updated.

Document	Clause	Comment	Update	Logic
BSCP503		acronym of DTC still there – is that correct?	Updated	Agree with comment, clause updated.
BSCP504	1.1	The reference to REC should simply state in accordance with REC, and remove the Metering Operations Schedule which constrains the scope.	Updated	Agree with comment, clause updated.
BSCP504	3.2.6.35 & 3.2.6.45	reference to REC has moved up a level. Would recommend it continues to refer to the Schedule itself to avoid confusion.	Not Updated	We do not believe this has a material impact.
BSCP504	3.3.1	same attempted use of SVA NHH MOA but cannot see use of SVA HH MOA - best avoided or clearly defined.	Not Updated	Reference to HH/NHH MOA has been left "as is" for CoMC activity to make clearer responsibilities between HH and NHH agents in where a CoMC takes place.
BSCP504	3.3.15.7 & 8	the addition of DSBR has happened, but not a MEM or RCC change - so should be included.	Not Updated	Not required as part of P420
BSCP504	3.3.15.7, .8	DSBR – acronym needs to be explained	Not Updated	Not required as part of P420
BSCP504	page 6	footnote references MRA. Is that correct?	Updated	Agree with comment, footnote removed.
BSCP509	1.6.1 & 4.1 et al	Used acronym of RECCo. I think elsewhere mostly used REC - as per the BSC definitions.	Not Updated	REC refers to the Code whereas RECCo refers to the Code Body carrying out action. The distinction is deliberate.
BSCP509	4.3.3	Not sure the footnote really works. Might be better with additional bullet,	Not Updated	We do not believe there is a difference in

Document	Clause	Comment	Update	Logic
		referring to SVA MOA which are qualified under REC.		content between footnote and bullet.
BSCP510	4.5	<p>"SMRA Report of MSIDs registered by Supplier"</p> <p>"The report provided by the SMRA shall contain the following data items" definitions of which can be found under the MRA</p> <p>Should the deleted text not be replaced with reference to the REC?</p>	Not Updated	Agree with comment, clause updated.
BSCP510	3.2.3	3.2.3 et al - Is it better to refer to the REC rather than the REC Metering Operations Schedule. It future proofs the BSCP is the REC schedules change name or depend on other aspects in the REC	Updated	Agree with comment, clause updated.
BSCP510	Acronyms	need to add REC	Updated	Agree with comment, clause updated.
BSCP513	1.1	<p>"For the avoidance of doubt, appointment of SVA Meter Operator Agents is not as in scope for this BSCP as these appointments will take place in accordance with the Retail Energy Code Metering Operations Schedule"</p> <p>Suggest remove "as"</p>	Updated	Agree with comment, clause updated.
BSCP515	3.3.A	3.3.A et al same comment as BSCP510 use of REC or REC	Updated	Agree with comment, clause updated.

Document	Clause	Comment	Update	Logic
		Metering Operations Schedule		
BSCP533 (Appendix B)	Annex B	"The following flows can be found within the MRA Data Transfer Catalogue" should be The following flows can be found within the Energy Market Data Specification"	Updated	Agree with comment, clause updated.
BSCP533 Appendix A	5.16	5.16 et al uses SVA HH MOA - which probably could just be SVA MOA as the file is defined as =H (indicates HH data). The context already defines the NNH/NHH split	Not Updated	PARMS Serials were left as is to account for potential impact of changing already defined terms within the description of the serials.
BSCP533 Appendix B		Use of HH & NHH SVA MOA and the reference to REC Metering Operations Schedule	Not Updated	PARMS Serials were left as is to account for potential impact of changing already defined terms within the description of the serials.
BSCP535	1.8	The Acronym "SVA MOA" has been added, however, within BSCP533 the definitions that have been added are "SVA HHMOA" and "SVA NHHMOA" - should there not be consistency within the definitions?	Not Updated	SVA HH/NHH has been left where activity describes communication between the two.
BSCP535	1.9	1.9 this should perhaps reference the Technical Assurance transitional period. There is currently no mention. Something similar to BSCP533 footnote "SVA MOAs will be subject to the	Updated	Agree with comment, clause updated.

Document	Clause	Comment	Update	Logic
		requirements of this BSCP for the period of the "SVA MOA Performance Assurance Transition Period" detailed in Section Z 5.1.1A – 5.1.1C"		
BSCP537	1.1	should it simply refer to the REC rather than the Qualification and Maintenance Schedule?	Updated	Agree with comment, clause updated.
BSCP550	1.1	1.1 et al same comment as BSCP510	Updated	Agree with comment, clause updated.
BSCP550		Footnotes 3 and 4 have been removed. These footnote refer to definitions of Import and Export within the BSC SVA Data Catalogue, therefore unclear why these footnotes have been removed?	Updated	Agree with comment, clause updated.
BSCP601		As proposed mostly housekeeping changes, except the MOCOPA ref. Question is whether the process will become a REC controlled process alongside the Metering CoPs	Not Updated	The Metering CoPs will remain under BSC Governance at least until the conclusion of the CoP Review and potentially enduring. BSCP601 is concerned with proving Metering Equipment meets the Settlement requirements and that HHDCs (who remain under BSC Governance) use the correct protocols to retrieve data. BSCP601 will not be impacted by any transition to the REC.

Document	Clause	Comment	Update	Logic
BSCP68	3.2.1.32	Footnote 26 deleted "Requirement to reject an attempt to set Energisation Status to "de-energised" whilst any mandatory field is blank is not in the NETA validation rules but is an MRA requirement" – if this is no longer an MRA requirement has this been picked up under the REC and if so should the footnote be retained and amended to reference the REC?	Updated	Agree with comment, clause updated.
CoP2, 3, 4, 5, 6, 7, 10		The only change is the reference to MOCOPA – while the intend is correct is the terminology correct – is it the Metering Schedule or the MOCOP?	Not Updated	MOCOPA will be transferred to the REC. The trademark MOCOPA is being retained but it is not clear if this will be its own schedule or included in the qualification schedule. We changed the references to just refer to the REC.
CoP4		The only change is the reference to MOCOPA – while the intend is correct is the terminology correct – is it the Metering Schedule or the MOCOP? May also need to be some changes to processes defined in BSC like commissioning which should be transferred into the REC because much of CoP4 is actually defining a	Not Updated	MOCOPA will be transferred to the REC. The trademark MOCOPA is being retained but it is not clear if this will be its own schedule or included in the qualification schedule. We changed the references to just refer to the REC.

Document	Clause	Comment	Update	Logic
		process. It is very different from the other CoPs which are equipment specifications.		Commissioning is a process concerned with checking accuracy for Settlement Purposes. CoP4 is to remain under BSC governance for the time being.
CoP8, 9		The only change is the reference to MOCOPA – while the intend is correct is the terminology correct – this one has been drafted differently to the others, not sure why?	Not Updated	MOCOPA will be transferred to the REC. The trademark MOCOPA is being retained but it is not clear if this will be its own schedule or included in the qualification schedule. We changed the references to just refer to the REC.
CRA URS	5.9	5.9 the existence of the MOA has simply been removed. This may be fine, but I am not sure whether this triggers any other actions or events. Might be worth just checking. The changes to reactive definitions are housekeeping not MEM changes therefore beyond scope of this MOD	Not Updated	Removed as no existing MOA requirements retained across this document.
General		the drafting needs to be consistent and either use REC or Retail Energy Code	Not Updated	Not a material change to the solution of P420.

Document	Clause	Comment	Update	Logic
General		need to be consistent and either say "Retail Energy Code Metering Operations Schedule for SVA Metering Systems", "the Retail Energy Code Metering Operations Schedule", "the Retail Energy Code Metering Operations Schedule 20" or "the relevant provisions of the REC" – it currently does both. Our preference is to be specific but recognise the Schedule name may change.	Not Updated	
General		need to be consistent in referencing level for REC – is it REC, REC MRA Transitional Schedule etc	Not Updated	References to REC MRA Transitional Schedule will be removed as part of REC v3.0 changes when directed.
General		number of updated BSCPs have had the page numbers removed from the contents section	Updated	Any HK changes have been updated as outlined in Section 8.
General		housekeeping changes were not always clearly signposted	Updated	Any HK changes have been updated as outlined in Section 8.
PARMS URS		Same as BSCP533 Appendix A comments	Not Updated	PARMS Serials were left as is to account for potential impact of changing already defined terms within the description of the serials. Happy to change to SVA MOA if no knock on impacts.

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Document	Clause	Comment	Update	Logic
Profile Admin SD		Same as BSCP510 and references to RECCo rather than REC	Not Updated	Not a material change to the solution of P420.
PSL100	10.1.2	Not sure you can say the document does not apply to MEMs then drop in a footnote that says the SVA MOA will provide data. Not good governance. Possibly require the Supplier to ensure that they can obtain the data from the SVA MOA - leaving the BSC obligation on the Supplier.	Updated	Agree with comment, clause updated.
SAD	18.1.7	The Supplier section has removed some interactions between Meter Operator and Supplier - are these picked up in the REC Supplier entry process? 18.1.7 has a reference to the MOCOPA under the REC - is this way of referencing the REC correct?	Not Updated	Not a material change to the solution of P420.
Section F	1.6.2A	"Cross Code Steering Group" – does this need to be defined under 1.6.1B?	Not Updated	Not a defined term under BSC.
Section F	1.6.2C	"REC Change Management Schedule" – does this need to be defined under 1.6.1B?	Not Updated	Not a defined term under BSC.
Section F	1.6A.1	There are two sub-clause (e)	Updated	Agree with comment, clause updated.
Section F	1.6A.2 (a)	"Modification Procedures" – is this a defined term?	Updated	Agree with comment, clause updated.

Document	Clause	Comment	Update	Logic
Section F	1.6A.4	"Cross Code Steering Forum" – is this the same as "Cross Code Steering Group"? if not should it be defined under 1.6.1B?	Updated	Agree with comment, clause updated.
Section F	2.11.22	"Cross Code Change Package" – is this a defined term?	Updated	Not a defined term under BSC so decapitalised.
Section F		Section F includes the drafting for the cross code change package. Our concern relates to the use of "mutatis mutandis". Whilst appropriate in terms of legal drafting, ELEXON should avoid its use in other documents and should opt to use simple clear English rather than Latin.	Not Updated	Not a material change to the solution of P420.
Section F		<p>We note the terminology for Market Message is not in line with REC:</p> <ul style="list-style-type: none"> • BSC (Section F) 'Market message' = means a message containing Data Items intended to be sent under or in connection with an Energy Code. • REC Interpretation schedule 'Market Message' = means the same as Energy Market Message o 'Energy Market Message' = means a structured communication sent between two market participant in the form and with the content required (and as otherwise 	Not Updated	Not a material change to the solution of P420.

Document	Clause	Comment	Update	Logic
		specified) by the Data Specification		
Section H	4.2.3 (f) (iv)	Section H – (f) (iv) the reference to 'Settlement agreement for Scotland' has been removed in addition to the reference to the MRA – Do not believe this to be correct.	Updated	Agree with comment, clause updated.
Section J	2.1B.2	"Without prejudice to paragraph 2.1B.2" should this reference "2.1B.1"?	Updated	Agree with comment, clause updated.
Section K	1.1.4 & 1.1.5	this references Barclays bank where the LDSO is located in England/Wales – no reference to Scotland	Not Updated	Not a material change to the solution of P420.
Section K	2.4.6	Not really clear why this paragraph exists. Is it constrained to SVA, it is constrained to NHH and puts an obligation of a SVA MOA which might be better placed commercially between the Supplier and the MAP.	Not Updated	Not a material change to the solution of P420.
Section K	Annex K.1	ref to MRA Transition schedule	Not Updated	References to REC MRA Transitional Schedule will be removed as part of REC v3.0 changes when directed.

Document	Clause	Comment	Update	Logic
Section L	2.1	I think it would be appropriate to move the Metering CoPs in to the REC. The Metering CoPs lay out the equipment requirements which must be followed to design, fit and maintain metering equipment. The governance of these documents would sit better within the REC as the MEMs are governed by the REC. It will also allow MEMs to raise changes under the REC. MEMs (and Party Agents generally) are unable to raised changes under the BSC.	Not Updated	Ofgem has agreed to defer decision on CoPs until post Issue 93.
Section L	1.2.4 (a)	Not convinced this is clear. I do not see the need to have the SVA Meter Operator text in the BSC. Whether the BSC SVA MOP becomes a MEM is governance under the REC. This confuses the drafting	Not Updated	SVA MOAs remain a Party Agent under the BSC and so obligations (whilst some of them may cross reference to the REC) are still included for completeness.
Section L	1.2.5	The drafting has introduced a "he is" might be better to use non gender term "they are". Not sure the comma after appointed is correct	Updated	Agree with comment, clause updated.
Section L	2.1B	Not sure is the numbering is correct here. 2.1B.1 refers to para 2 & 3 and it is not clear which paragraphs this is referring too. 2.1B.2 is the control actually with the REC	Not Updated	Reference not within P420 redlining.

Document	Clause	Comment	Update	Logic
		to determine an 'end date' for any applicants under the BSC. It is in no-ones interest to allow this to runs on indefinitely, so setting an end date of [March 2022] may make it clear to applicants.		
Section L	3.3.2	The judgment of the MOA should be replaced with a MEM under the REC. The MEM is still best placed to determine good practice. This is a fundamental change, which this Mod is focused on transferring the obligations from the BSC to the REC, not for changing who makes decisions on good practice.	Not Updated	An SVA MOA is defined in Section X as a MEM under the REC so this is essentially the same thing. CVA MOAs will make judgement under the BSC.
Section W	1.7	no RCC changes but clause 1.7 is all about the MRA. Please confirm if it is correct to leave it as is.	Updated	Agree with comment, clause updated.
Section W	1.3.1	Drafting put is brackets is not clear - should perhaps say 'data and/or processes required under the REC which has or potentially has an impact on the accuracy of Settlement'. To narrow the data to impacts on settlement?	Updated	Agree with comment, clause updated.
Section W	1.7 & 5.4.1	references the MRA in terms of the Trading Disputes	Updated	Agree with comment, clause updated.

Document	Clause	Comment	Update	Logic
		process – this should be removed		
Section X		no marked changes, please confirm if there are any	Not Updated	Document included because of changes to Section X-1.
Section X - 1		The Section X -1 definition of metering point text has been changed reflect the definition in the DNO licence, which points to Schedule 8 of the MRA. This section is due to be removed from the MRA and transferred to the MRA transition Schedule in the REC as part of the licence drafting. It is worth being aware that the two elements need to be co-ordinated.	Not Updated	We expect the DNO licence to be amended to reflect demise of MRA.
Section X-1		CVA MOA – remove 'and' between 'test and maintain'.	Not Updated	Not a material change to the solution of P420.
Section X-1		Meter Operator Agent – is this used anywhere or have all references been changed to SVA & CVA MOA?	Not Updated	Meter Operator Agent has been used where requirements apply to both CVA and SVA equally.
Section X-1		Qualified Person – does the exclusion for SVA MOA need to be stated, or is it already covered by the Qualification section J exclusions?	Not Updated	We have left in for clarity purposes.
Section X-1		SVA MEM – this should be further constrained to electricity MEMs under the REC?	Updated	Agree with comment, clause updated.
Section X-1		Is Industry Code Manager correct for all codes? DCUSA is	Not Updated	Not a material change to the solution of P420.

Document	Clause	Comment	Update	Logic
		still a Code Administrator.		
SVA DC Volume 1	Intro v54.1 footnote page 11	reference to DTC remains – is that correct?	Not Updated	This is correct, no update required.