





BSC Modification Proposal Form		At what stage is this document in the process?
<b>Mod Title:</b> 'Updating the P375 legal text to align with the post-P420 BSC Baseline'		<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid green; background-color: #28a745; color: white; padding: 2px; display: flex; align-items: center; justify-content: center;">01 Modification</div> <div style="border: 1px solid blue; padding: 2px; display: flex; align-items: center; justify-content: center;">02 Workgroup Report</div> <div style="border: 1px solid purple; padding: 2px; display: flex; align-items: center; justify-content: center;">03 Draft Modification Report</div> <div style="border: 1px solid orange; padding: 2px; display: flex; align-items: center; justify-content: center;">04 Final Modification Report</div> </div>
<p><b>Purpose of Modification:</b> To ensure that the Legal Text for approved BSC Modification <a href="#">P375 'Settlement of Secondary BM Units using metering behind the site Boundary Point'</a> is aligned with the BSC baseline introduced by the implementation of <a href="#">P420 'Retail Code Consolidation Significant Code Review'</a>. This Modification will correct a number of manifest errors introduced into the P375 legal text by P420 and therefore allow the implementation of the P375 Legal Text in the BSC on the P375 Implementation Date.</p>		
<p><b>Is this Modification likely to/Does this Modification impact any of the European Electricity Balancing Guideline (EBGL) Article 18 Terms and Conditions held within the BSC?</b></p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>		
	<p>Elexon recommends that this Modification should:</p> <ul style="list-style-type: none"> <li>• be raised by the Panel in accordance with provisions of Section F2.1.1(d)(iv)</li> <li>• be a Self-Governance Modification Proposal</li> <li>• be sent directly into the Report Phase</li> </ul> <p>This Modification proposal will be presented by the Proposer's representative to the BSC Panel on 11 November 2021. The Panel will consider whether to raise the Modification in accordance with BSC Section F 2.1.1(d)(iv) and determine how best to progress the Modification.</p>	
	<p>High Impact:</p> <ul style="list-style-type: none"> <li>• None</li> </ul>	
	<p>Medium Impact:</p> <ul style="list-style-type: none"> <li>• None</li> </ul>	
	<p>Low Impact:</p> <ul style="list-style-type: none"> <li>• Elexon</li> </ul>	

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## Timetable


### The Proposer recommends the following timetable:

Panel considers Initial Written Assessment (IWA)	09/12/2021
Report Phase Consultation (10 WDs)	13/12/2021 - 05/01/2022
Draft Modification Report presented to Panel	13/01/2022
Final Modification Report published	17/01/2022
Self-Governance Appeals Window	13/01/2022 - 27/01/2022

 **Any questions?**

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# 1 Why Change?

## What is the issue?

The legal text for [P375 'Settlement of Secondary BM Units using metering behind the site Boundary Point'](#) was approved and finalised by the BSC Panel at its meeting in October 2020 ([307/06](#)), well before the full P420 solution had been developed. P375 was subsequently approved by Ofgem on 24 February 2021 for implementation on 30 June 2022.

Modification [P420 'Retail Code Consolidation Significant Code Review'](#) was implemented on 1 September 2021, amending the Balancing and Settlement Code (BSC) to align it with the Retail Energy Code (REC) version 2.0.

The BSC changes for P420 included the removal of all references to SVA Meter Operator Agents being Qualified under the BSC. Changes also included the removal of [BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'](#) and all references to it from BSC Sections and BSC Configurable Items, which required significant changes to BSC [Section K 'Classification and Registration of Metering Systems and BM Units'](#) and [Section L 'Metering'](#). The approved P375 legal text includes references to BSCP514 and Meter Operator Agents, along with other inconsistencies and errors. Consequently, the P375 legal text cannot be implemented on 30 June 2022 as it currently stands.

This Modification seeks to resolve this by correcting inconsistencies and errors, and by modifying the P375 BSC changes to remove any references to items removed from the BSC for P420. Most of the BSC Sections and Code Subsidiary Documents (CSDs) amended by P375 need to be re-baselined on the post-P420 version of the BSC to give full effect to the intent of Approved Modification P375.

## Desired outcomes

This Modification, if approved, should amend the changes approved under P375 without changing their intent. The BSC changes for this Modification should be implemented in the BSC on 30 June 2022, to give effect to the full intent of the P375 solution, but without reversing any of the BSC changes introduced for P420.

## 2 Solution

### Proposed Solution

This Modification should resolve legal text conflicts by modifying the approved P375 redlining to remove any reference to items that were removed from the BSC for P420. This includes the replacement of references to the below with references to BSCP603 'Meter Operations and Data Collection for Asset Metering Systems', approved by the Panel at its meeting in October 2021 ([319/06](#)), in order to give effect to P375:

- [BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) (relating to Asset Metering Systems, at the recommendation of the PAB);
- [BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'](#); and
- Meter Operator Agents to SVA Meter Operator Agents.

Amendments will also resolve non-material errors and housekeeping amendments made to the legal text and Code Subsidiary Document (CSDs), including one formatting conflict with a change introduced by [P383 'Enhanced reporting of demand data to the NETSO to facilitate CUSC Modifications CMP280 and CMP281'](#).

### Benefits

This Modification will allow the effective implementation of P375, enabling the benefits of that Modification to be delivered. Further details on those benefits can be found in the P375 Final Modification Report, available on the [P375 webpage](#). It will also ensure the P375 legal text can be implemented without conflicts or manifest errors.

### 3 Relevant 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	<b>Positive</b>
(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 administrating the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation	Neutral
(g) Compliance with the Transmission Losses Principle	Neutral

The Modification has a positive impact on BSC Applicable Objective (d) as it allows those benefits of P375 to be realised on 30 June 2022.

## 4 Potential Impacts

### Impacts on Core Industry Documents

Impacted Core Industry Documents			
<input type="checkbox"/> Ancillary Services Document	<input type="checkbox"/> Connection and Use of System Code	<input type="checkbox"/> Data Transfer Services Agreement	<input type="checkbox"/> Use of Interconnector Agreement
<input type="checkbox"/> Retail Energy Code	<input type="checkbox"/> Distribution Connection and Use of System Agreement	<input type="checkbox"/> System Operator Transmission Owner Code	<input type="checkbox"/> Supplemental Agreements
<input type="checkbox"/> Distribution Code	<input type="checkbox"/> Grid Code	<input type="checkbox"/> Transmission License	<input checked="" type="checkbox"/> None

Although this Modification will not require any changes to the REC, P375 will require a new ‘Data Transfer Participant Role’ for AMVLP in the Energy Market Data Specification (EDMS), which will replace the Data Transfer Catalogue (DTC) under the REC. This is being progressed separately from this Modification to give full effect to P375.

### Impacts on BSC Systems

Impacted Systems				
<input type="checkbox"/> CRA	<input type="checkbox"/> CDCA	<input type="checkbox"/> PARMS	<input type="checkbox"/> SAA	<input type="checkbox"/> BMRS
<input type="checkbox"/> EAC/AA	<input type="checkbox"/> FAA	<input type="checkbox"/> TAAMT	<input type="checkbox"/> NHHDA	<input type="checkbox"/> SVAA
<input type="checkbox"/> ECVAA	<input type="checkbox"/> ECVAA Web Service	<input type="checkbox"/> ELEXON Portal	<input checked="" type="checkbox"/> None	

This Modification is a document-only change, as it is only amending the approved P375 legal text and CSDs to allow their effective implementation on the post-P420 baseline. This is being done without changing the intent or processes introduced under P375.

### Impacts on BSC Parties

Impacted Parties			
<input type="checkbox"/> Supplier	<input type="checkbox"/> Interconnector User	<input type="checkbox"/> Non Physical Trader	<input type="checkbox"/> Generator
<input type="checkbox"/> Licensed Distribution System Operator	<input type="checkbox"/> National Electricity Transmission System Operator	<input type="checkbox"/> Virtual Lead Party	<input checked="" type="checkbox"/> None

This Modification will not have any impacts on BSC Parties beyond those already identified under P375. As above, this is a document-only change that will allow P375 to be implemented on the post-P420 baseline.

## Impacts on consumers and the environment

Impact of the Modification on consumer benefit areas:	
Consumer benefit area	Identified impact
Improved safety and reliability <i>This Modification has no significant impact on safety or reliability</i>	Neutral
Lower bills than would otherwise be the case <i>This Modification is not expected to have a significant impact on customer bills</i>	Neutral
Reduced environmental damage <i>This Modification is not expected to have an impact in terms of reducing environmental damage</i>	Neutral
Improved quality of service <i>This Modification will have no significant impact on quality of service.</i>	Neutral
Benefits for society as a whole <i>This Modification is not expected to directly provide significant benefits for society as a whole</i>	Neutral

Whilst this Modification will not have a direct impact on consumers and the environment, it will enable effective implementation of P375. A detailed description of the expected benefits of P375 can be found in the P375 Final Modification Report, available on the [P375 webpage](#).

## Legal Text Changes

Changes will be needed to the majority of those documents amended by P375.

## 5 Governance

### Self-Governance

<input type="checkbox"/> <b>Not Self-Governance</b> – A Modification that, if implemented materially impacts:	
<input type="checkbox"/> the Code’s governance or modification procedures	<input type="checkbox"/> sustainable development, safety or security of supply, or management of market or network emergencies
<input type="checkbox"/> competition	<input type="checkbox"/> existing or future electricity consumers
<input type="checkbox"/> the operation of national electricity Transmission System	<input type="checkbox"/> likely to discriminate between different classes of Parties
<input checked="" type="checkbox"/> <b>Self-Governance</b> – A Modification that, if implemented:	
Does not materially impact on any of the Self-Governance criteria provided above as the changes are correcting manifest errors introduced by P420 into the P375 approved legal text.	

### Progression route

The Panel should raise this proposed modification on the recommendation of Elexon (as BSCCo), as Elexon has become aware of a change in circumstances, since P375 was approved, which would make the full implementation of P375 impossible (as per BSC Section F 2.1.1(d)(iv)), as P375 approved legal text requires the MOA processes to be specified in BSCP514. BSCP514 is no longer part of the BSC baseline, following the implementation of P420.

<input type="checkbox"/> <b>Submit to assessment by a Workgroup</b> – A Modification Proposal which:	
does not meet any criteria to progress via any other route.	
<input checked="" type="checkbox"/> <b>Direct to Report Phase</b> – A Modification Proposal whose solution is typically:	
<input checked="" type="checkbox"/> of a minor or inconsequential nature	<input checked="" type="checkbox"/> deemed self-evident
<input type="checkbox"/> <b>Fast Track Self-Governance</b> – A Modification Proposal which meets the Self-Governance Criteria and:	
is required to correct an error in the Code as a result of a factual change including but not limited to:	
<input type="checkbox"/> updating names or addresses listed in the Code	<input type="checkbox"/> correcting minor typographical errors
<input type="checkbox"/> correcting formatting and consistency errors, such as paragraph numbering	<input type="checkbox"/> updating out of date references to other documents or paragraphs
<input type="checkbox"/> <b>Urgent</b> – A Modification Proposal which is linked to an imminent issue or current issue that if not urgently addressed may cause:	
<input type="checkbox"/> a significant commercial impact on Parties, Consumers or stakeholder(s)	<input type="checkbox"/> a Party to be in breach of any relevant legal requirements.
<input type="checkbox"/> a significant impact on the safety and security of the electricity and/or gas systems	



## **Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?**

This Modification does not impact any ongoing SCRs or significant industry change projects, beyond allowing the full intent of P375 to be implemented.

## **Does this Modification impact any of the EBGL Article 18 Terms and Conditions held within the BSC?**

Some of the changes proposed (specifically, changes to Section K8 and Section S11) amend BSC provisions identified as constituting European Balancing Guideline (EBGL) Article 18 Terms and Conditions, as listed in [BSC Section F, Annex F-2](#). However, as above, these changes are being made to correct manifest and non-material errors as a result of factual changes due to the implementation of P420. These types of amendments are not required to follow the EBGL change process as they constitute housekeeping changes.

Specifically, these types of amendment are not defined as impacting the Self-Governance Criteria, as described in Self-Governance Criteria (a), (a)(i), (a)(ii) and a(iii). Therefore, we propose this Modification be progressed as Self-Governance.

## **Implementation approach**

This Modification should be implemented at the same time as P375 on 30 June 2022 as part of the June 2022 standard BSC Release.