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## BSC Change Report

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### Summary

**The Change Report is a monthly summary of all Modifications, Change Proposals and Issues that are currently active. It shows the progress of each change in a visual 'progress bar', as well as containing text updates on what has changed since last month's Change Report. This report covers updates since 1 May 2023 until 26 May 2023.**

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### Summary of Open Changes

For details on the types of changes, the different phases, the types of reports and consultations please see Appendix 1.

Total changes open up until implementation:

- Modifications: 11
- Change Proposals: 11
- Issues: 5

#### New changes since last month

- CP1577, CP1578, CP1579, CP1580

#### Workgroups

- Five Workgroups held since last month's report: P441 – 2 May, P442 – 24 May, P451 – 5 May, Issue 101 – 25 May, Issue 105 – 31 May
- Five Workgroups coming up: P451 – 14 June, P454 – late June, Issue 105 – 31 May, Issue 106 – 15 June, Issue 107 – 6 May

#### Consultations

- Consultations closed since last month's report: P415 & P444 RPC: 17 April – 17 May, P443 RPC: 17 April – 17 May
- Live Consultations: May CPC Batch: 9 May – 6 June
- Consultations coming up: June CPC Batch: 12 June – 7 July, Issue 101 BR Consultation: 12 June – 30 June

#### Extension requests

- P441 (four month extension)

#### Awaiting decision (decision cut-off)

- Authority: P432 (n/a)

#### Decisions since last month

- Approved: P453 (SG Objection window closes 2 June), CP1580 (HK Objection window closes 2 June)
- Rejected: None

#### Awaiting Implementation

- **Jun 23:** CP1558, CP1568 CP1571, CP1572, CP1580
- **Nov 23:** P395, P453

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# Contents

<b>I. Modification Updates – up until decision</b>	<b>3</b>
<b>II. Change Proposal Updates – up until decision</b>	<b>16</b>
<b>III. Issue Updates</b>	<b>22</b>
<b>IV. Progression of Modifications – up until implementation</b>	<b>25</b>
<b>V. Progression of Change Proposals – up until implementation</b>	<b>27</b>
<b>VI. BSC Releases Road Map</b>	<b>29</b>
<b>VII. Modification Trend Chart</b>	<b>30</b>
<b>VIII: Recommendations</b>	<b>32</b>
<b>Appendix A</b>	<b>33</b>

## I. Modification Updates – up until decision

<b>P412: Ensuring non-BM Balancing Services providers pay for non-delivery imbalances at a price that reflects the real-time value of energy</b>					<b>No Update</b>		
<b>Date Raised:</b>	3 September 2020		<b>Proposer:</b>	NGESO			
<b>Target Implementation Date:</b>	TBC		<b>Current Status:</b>	Assessment Procedure: on-hold			
<b>Progression:</b>	<b>IWA</b>	<b>APC</b>	<b>AR</b>	<b>RPC</b>	<b>DMR</b>	<b>FMR</b>	<b>I</b>
	Sep 20	On-hold	Nov 23	Dec 23	Jan 24	Jan 24	TBC
<b>Latest Update:</b>	At its January 2023 meeting, the Panel approved a nine month extension to the Assessment Procedure in order for NGESO to conclude its work with DESNZ and Ofgem on how the Clean Energy Package requirements can be best met.						
<b>Next Event:</b>	NGESO are continuing to engage with DESNZ on the possibility of a derogation against Article 6(5) of the Clean Energy Package, which would remove the need to progress P412. Dependent on the outcome of the discussions with Ofgem and BEIS, further Workgroup meetings may need to be held to consider next steps in developing the P412 solution.						
<b>Issue:</b>	P412 will introduce imbalance charges for non-Balancing Mechanism (BM) Balancing Services providers, where their delivery does not match instructed volumes. This will mean the GB market more effectively meets the requirements of the Clean Energy Package.						
<b>Current Solution:</b>	P412 will introduce adjustments to Supplier's imbalance positions by non-BM Balancing Service Providers' instructed volumes, rather than delivered volumes as currently occurs under the P354 'Use of ABSVD for non-BM Balancing Services at the metered (MPAN) level' solution.						
<b>History:</b>	<p>For full details visit the <a href="#">P412 webpage</a>.</p> <p>P412 was raised on 3 September 2020. The Initial Written Assessment was presented to the Panel on 10 September 2020 and entered into the Assessment Procedure.</p> <p>The first Workgroup meeting was held on 29 October 2020 to discuss the issue, the proposed solution, next steps and the proposed timetable.</p> <p>The second Workgroup meeting was held on 27 November 2020 to consider five possible solutions and discuss the pros and cons of each option.</p> <p>The third Workgroup meeting was held on 22 February 2021 to further consider the legal and technical issues with the five possible solutions.</p> <p>The fourth Workgroup meeting was held on 7 April 2021. The Proposer subsequently consulted the Workgroup and industry on the impacts that the solution options may have, to then present a cost benefit analysis to Ofgem to determine how P412 should proceed. This process was expected to conclude in November 2021.</p> <p>The Panel approved a six month extension to the Assessment Procedure at its meeting on 8 April 2021 for this analysis to take place. The Proposer's revised timetable for the cost benefit analysis consultation meant that it was issued in October 2021, with a view to then engage with Ofgem. Further Workgroup meetings may be required to consider the development of the solution and next steps.</p> <p>The Panel approved a nine month extension to the Assessment Procedure at its meeting on 14 October 2021. National Grid ESO's cost benefit analysis consultation was issued on 18 October 2021 and closed on 26 November 2021. The Panel approved a six month extension to the Assessment Procedure at its meeting on 14 July 2022.</p>						

<b>P415: Facilitating access to wholesale markets for flexibility</b>					<b>Update</b>		
<b>dispatched by Virtual Lead Parties</b>							
<b>Date Raised:</b>	30 September 2020		<b>Proposer:</b>	Enel X UK Ltd			
<b>Target Implementation Date:</b>	7 November 2024		<b>Current Status:</b>	Report Phase			
<b>Progression:</b>	<b>IWA</b>	<b>APC</b>	<b>AR</b>	<b>RPC</b>	<b>DMR</b>	<b>FMR</b>	<b>I</b>
	Oct 20	Feb 23	Apr 23	May 23	Jun 23	Jun 23	Nov 24
<b>Latest Update:</b>	The Report Phase Consultations for P415 and P444 were issued on 17 April 2023, running for one calendar month due to identified impacts on the EBGL Article 18 Terms and Conditions. The consultation closed on 17 May 2023. Six responses were received to the consultation, which were mixed between agreeing and disagreeing with the Panel's recommendation to approve P415.						
<b>Next Event:</b>	The BSC Panel will consider P415 for a final time on 8 June 2023 before this Modification is passed to Ofgem for their decision.						
<b>Issue:</b>	Consumers of electricity who are able to be flexible about their consumption cannot currently obtain any value from that flexibility from the Wholesale Energy Market, except if they work with their Supplier to do so. This contrasts with Balancing Services, the Balancing Mechanism, and the Capacity Market, all of which allow a customer's flexibility to be offered by an aggregator without the involvement of the Supplier.						
<b>Current Solution:</b>	This Modification seeks to allow Virtual Lead Parties to obtain value from flexibility within the Wholesale Energy Market. Under the Proposed Solution, compensation costs are mutualised, with compensation paid at a price that approximates the Supplier's expected sourcing costs. Under the Alternative Solution, VLPs are liable to pay compensation costs for volumes adjusted by that VLP, with compensation paid at a price that approximates the Supplier's expected sourcing costs.						
<b>History:</b>	<p>For full details visit <a href="#">P415 webpage</a>.</p> <p>Raised by Enel X UK Ltd on 30 September 2020.</p> <p>Presented on 8 October 2020, where the Panel agreed to progress P415 to the Assessment Phase.</p> <p>Workgroup 1 – held on 11 December and discussed the principles behind the Modification.</p> <p>Workgroup 2 – held on 9 February and discussed more complex worked examples.</p> <p>Workgroup 3 – held 25 March where the group considered how best to incorporate P376 functionality and considered network charging.</p> <p>Workgroup 4 – held on 27 May 2021 where the Workgroup discussed current network charging arrangements, VLP's role in the market and imbalance settlement.</p> <p>Workgroup 5 – CEPA prepared a CBA options paper on behalf of the Workgroup. The paper can be found on the P415 webpage.</p> <p>Workgroup 6 – held on 3 September 2021 where the Workgroup reviewed the approach to Supplier Compensation within the Cost Benefit Analysis piece.</p> <p>Workgroup 7 – held on 28 October 2021 where the Workgroup continued to assess credit and reporting requirements.</p> <p>Workgroup 8 – held on 10 December 2021, where the Workgroup noted updates related to the P415 CBA outcome and determined the method for separating wholesale market and balancing market volumes.</p> <p>Workgroup 9 – held on 1 February 2022, where the Workgroup conducted an end-to-end solution review, noting the Proposer's preferred solution and capturing any alternative views</p> <p>Workgroup 10 - held on 22 February, where CEPA presented and verified the cost-benefit analysis (CBA) methodology and assumptions with the Workgroup members. Elxon issued the Call for Evidence for P415 to inform cost-benefit analysis (CBA) which closed on 9 May, receiving 9 responses from Suppliers, VLPs and NGESO.</p> <p>Workgroup 11 – held on 30 May, where the P415 Workgroup met to consider methodologies for calculating the Supplier Compensation Reference Price.</p>						

Workgroup 12 - held on 1 July, where CEPA presented provisional CBA findings.  
Workgroup 13 - held on 22 August, where CEPA presented CBA findings.  
The final Cost Benefit Analysis Report, conducted by CEPA, was published on 22 September 2022.

Workgroup 14 – held on 7 October, where the Workgroup considered the final CBA findings.

The Panel approved a 4 month extension to P415's Assessment Phase so that Elexon can return with the P415 Assessment Report to the Panel at its standard meeting in April 2023. This is because the completion of the CBA took longer than expected due to availability over summer, and P444 has been raised (which P415 now needs to dovetail with). The recent urgent Modifications also meant ability to work on P415 was constrained in October.

Workgroup meeting 15 was held on 7 December, where the Workgroup reviewed the legal text and prepared for the Assessment Consultation.

The Assessment Procedure consultation was issued on 24 January 2023 with responses invited by 14 February.

Workgroup meeting 16 was held on 22 February to consider consultation responses.

Workgroup meeting 17 was held on 28 March to conduct final voting and gather final views.

The P415 Workgroup met for a final time on 28 March to consider the outcomes of additional engagement with NGESO, which resulted in the addition of a new high level requirement for VLPs to provide additional Deviation Volume information to NGESO, and provide final views on the Modification. Ofgem updated the group that their preference was for both a Proposed and Alternative to be brought forward to allow them as full a picture as possible when making a decision. However, only a minority of voting members believed that the potential alternative was better than the Proposed Solution. Ofgem further added that this may increase the chance of delays (ultimately putting the ability to deliver in November 2024 at risk) by increasing the chance of a Send Back or Rejection should they find merit in the alternative approach. In order to remove this risk, the P415 Proposer "switched" the Proposed Solution with the alternative approach which allowed a majority of the group to raise a formal Alternative within allowed BSC process, and a majority voted that this Alternative was now better than the Proposed, to allow both these options to go forward, be presented to the BSC Panel and Ofgem and reduce the chance of delays. The Workgroup recommend that the Alternative Solution be approved.

The P415 Assessment Report was presented to the BSC Panel on 13 April. The Panel initially recommended P415 is approved.

<b>P432: Half Hourly Settlement for CT Advanced Metering Systems</b>	<b>No Update</b>
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<b>Date Raised:</b>	2 December 2021	<b>Proposer:</b>	Npower Commercial Gas Limited
<b>Target Implementation Date:</b>	+3 months from Authority decision	<b>Current Status:</b>	Awaiting Decision

<b>Progression:</b>	<b>IWA</b>	<b>APC</b>	<b>AR</b>	<b>RPC</b>	<b>SBC</b>	<b>DMR</b>	<b>FMR</b>	<b>I</b>
	Dec 21	Apr 22	May 22	Jun 22	Oct 22	Nov 22	Nov 22	+3 months

**Latest Update:** The second P432 Final Modification Report was sent to the Authority for decision on 16 November 2022, with a recommendation to approve P432.

**Next Event:** P432 is currently with Authority for decision. A decision was required by 29 March 2023, in order to meet the scheduled June 2023 Release. As this was not possible, the Implementation Date has defaulted to three months after Ofgem approval, as stated in the Final Modification Report.

**Issue:** Market-wide Half-Hourly Settlement (MHHS) requires that all Metering System Identifiers (MSIDs) are settled on a Half Hourly (HH) basis. The Code Change and Development Group (CCDG) has recommended moving CT Advanced Meters to settle HH by October 2023. If this recommendation is not implemented the risk that there will be insufficient time for Customers, Suppliers and their Agents to address issues that may arise will be increased, especially against the backdrop of the larger MHHS migration activities that will be needed for smart Meters.

**Current Solution:** This Modification seeks to align the BSC definition of an Advanced Meter with that in the Standard License Conditions (SLC) and to set explicit HH Settlement obligations for CT Advanced Meters ahead of the migration to MHHS. Existing CT Advanced Meters settling NHH are expected to migrate using the Change of Measurement Class (CoMC) process to settle HH by October 2023 and all new connections for CT Advanced Meters will be expected to settle HH from October 2022.

**History:**

P432 was raised by Npower Commercial Gas Limited on 2 December 2021. The Initial Written Assessment was presented to the BSC Panel at its meeting on 9 December 2021, where it was progressed to the Assessment Procedure. The first Workgroup meeting for P432 was held on 24 January 2022. Elexon presented the background, issue and proposed solution for P432. The Workgroup considered the ToR and the next steps.

The second P432 Workgroup meeting took place on 23 February 2022. The Workgroup agreed on a solution for the Assessment Consultation, the draft legal text and the Assessment Consultation questions. The Workgroup initially recommend by majority that P432 should be approved.

The Panel granted P432 a one month extension at its March 2022 meeting due to quoracy issues holding the first meeting. Following the extension, the Assessment Report was scheduled to be presented to the Panel at its meeting on 12 May 2022, however a further extension request will be made at the April Panel meeting.

The Panel granted P432 a two month extension at its April 2022, as the consultation was issued later than planned due to delays with the review activities from Workgroup Members. We have planned for a fourth contingency Workgroup. Should this not be needed, we will present the Assessment Report to Panel at its June Meeting, otherwise at its July meeting.

The Assessment Procedure Consultation for P432 was issued on 30 March 2022 with responses invited by 22 April 2022. There were 10 responses with the majority disagreeing with the Workgroup that P432 should be approved. Concerns were also raised with the proposed implementation approach, driven by MHHS causing capacity issues.

The Workgroup considered the responses to the Consultation and by majority provided its final recommendation that P432 should be approved.

P432 Assessment Report was presented to the Panel on 9 June 2022. The majority of the Panel initially recommend P432 is rejected. The P432 Report Phase Consultation was issued on 15 June 2022, with responses due 1 July 2022.

The P432 Draft Modification Report was presented to the Panel on 14 July 2022. By majority the Panel's final recommendation to Ofgem was to reject P432. The P432 Final Modification Report was submitted for Ofgem decision on 20 July 2022.

On 26 August 2022 Ofgem sent P432 back to the Panel for further work as per BSC Section F, 2.7A.1(a) on the basis that they did not think sufficient evidence was provided that consumers will not be negatively impacted by increasing costs if migration is delivered on the existing timeframes or that the timeframe specified is necessary to deliver the required de-risking of MHHS implementation. Ofgem also requested a related DCUSA modification be raised and implemented before the P432 migration starts.

A Workgroup meeting was held on 29 September 2022, where the Workgroup members agreed on a new Implementation approach for P432 to address the Ofgem Send Back. The majority of the Workgroup believe P432 should still be approved. P432 was issued for a 10WD Send Back consultation with responses invited by 25 October. 17 responses to the consultation were received. The majority believed P432 should be approved. However, all Suppliers but one believed it should be rejected. The Workgroup considered the responses at a meeting on 27 October, where the Workgroup were split on whether P432 should be approved or rejected.

P441: Creation of Complex Site Classes					Update		
<b>Date Raised:</b>	7 July 2022		<b>Proposer:</b>		Green Energy		
<b>Target Implementation Date:</b>	TBC		<b>Current Status:</b>		Assessment Procedure		
<b>Progression:</b>	<b>IWA</b>	<b>APC</b>	<b>AR</b>	<b>RPC</b>	<b>DMR</b>	<b>FMR</b>	<b>I</b>
	Jul 22	May 23	Jul 23	Aug 23	Sep 23	Sep 23	Nov 23
<b>Latest Update:</b>	The sixth P441 Workgroup was held on 2 May. At this meeting, the Workgroup considered the remaining Terms of Reference for P441 and confirmed that parallel changes will need to be raised in both REC and DCUSA. Ofgem has suggested alignment is required on these changes and timelines should be lined up accordingly.						
<b>Next Event:</b>	Elexon will arrange the seventh Workgroup meeting in July to review the legal text, update on actions and confirm the Assessment Procedure questions to coincide with the timelines for the consequential REC and DCUSA changes.						
<b>Extension Request:</b>	DCP-424 'Use of System charging for Complex Sites' has been raised to consequently amend the DCUSA in line with the Workgroup agreed P441 solution. A REC consequential change is also required and is due to be raised soon. Taking these two progression timetables into account, we are requesting an extension to the Assessment Procedure of four months, returning to the Panel with the Assessment Report by November 2023 Panel meeting.						
<b>Issue:</b>	<p>In recent years, a number of queries have been raised to Elexon and in wider industry forums related to the scope of the Complex Site arrangements under the BSC. More specifically, when the BSC and its Code Subsidiary Documents (CSDs) permit the netting of Imports from Exports through a Complex Site arrangement and the scenarios in which this netting is permissible.</p> <p>During conversations under Issue 88 'Clarification of BSC Arrangements relating to Complex Sites' it was identified that certain arrangements have been allowed under the BSC although not clearly defined to facilitate consistency across the market. As so called "Local Energy Schemes" become more popular, it is essential that the rules for when netting should be permitted are clearly defined going forward.</p>						
<b>Current Solution:</b>	<p>P441 seeks to create six categories of Complex Site, each with clearly defined criteria. Classes 1 - 5 are intended to formalise the criteria for those "types" of Complex Site, which are currently recognised as such and are already in use within the industry. In particular, a Class 5 Complex Site would set out the criteria in which netting across Boundary Points is permitted (for example, in order to facilitate the establishment of a Local Energy Scheme).</p> <p>A Class 6 Complex Site would be a 'non-standard' arrangement that has aspects of a complex site but does not clearly fit in any of the other five classes. This would be akin to the current process of assigning Central Volume Allocation (CVA) Metering System Identifiers (MSIDs) to a "standard" or "non-standard" BM Unit.</p>						
<b>History:</b>	<p>P441 was raised on 7 July 2022 by Green Energy. The Panel sent P441 to the Assessment Procedure Phase at its meeting on the 14 July 2022.</p> <p>The first Workgroup meeting took place on Wednesday 31 August 2022. At this meeting, the Workgroup considered the P441 background and issue, explored the Workgroup Terms of Reference, and discussed the potential solutions for P441.</p> <p>The second P441 Workgroup meeting was due to be held on 6 October but had to be cancelled due to the constraints caused by the progression timetable of urgent Modification P448.</p> <p>The second P441 Workgroup meeting took place on 6 December 2022, where the Workgroup determined that a central register should be maintained for Class 5 Complex Sites, and that a notification should be sent by Supplier Volume Allocation (SVA) Meter Operator Agents (MOAs) to Elexon with information about a Class 5 Complex Site.</p> <p>The second P441 Workgroup meeting was held on Tuesday 6 December 2022. The Workgroup considered the impact of P441 on Network Charges, possible solution</p>						



options for the registration of metering systems for Complex Sites and the need for a central register and associated notification process.

The Panel agreed to a five month extension to the Assessment Procedure at its meeting on 14 July 2022.

The third P441 Workgroup was held on 17 January 2023. The Workgroup discussed the requirements for Network Charges and discussed P441's interactions with the Market Wide Half Hourly (MHHS) Programme.

The fourth and fifth Workgroup meeting were held on Tuesday 21 February and 21 March respectively. Across both meetings, the Workgroup confirmed that P441 will not have a direct impact on MHHS, they agreed the requirements for the BSUoS, TNUoS and DUoS charging arrangements for Class 5 Complex Sites. Further, the Workgroup considered four redline drafting options for the impacted documents, and agreed on the option that will seek the governance requirements placed in the BSC and procedural steps in the BSCPs, in line with the BSC redline principles.

The fifth Workgroup meeting was held on 21 March 2023. The Workgroup concluded the requirements for DUoS charges, Group Correction Factor, and Line Loss Factor for Class 5 Complex Sites. Also, the Workgroup discussed and confirmed the appropriate drafting option for the relevant BSC documents.

P442: Reporting chargeable volumes for exempt and licensed supply						Update	
<b>Date Raised:</b>	7 July 2022			<b>Proposer:</b>	UC Energy Ltd		
<b>Target Implementation Date:</b>	TBC			<b>Current Status:</b>	Assessment Procedure		
<b>Progression:</b>	<b>IWA</b> Jul 22	<b>APC</b> Sep 23	<b>AR</b> Nov 23	<b>RPC</b> Dec 23	<b>DMR</b> Jan 24	<b>FMR</b> Jan 24	<b>I</b> TBC
<b>Latest Update:</b>	The second P442 Workgroup meeting was held on 24 May 2023. The Workgroup explored the proposed solution in more detail, including worked examples for the proposed imbalance adjustment methodology.						
<b>Next Event:</b>	Elexon will arrange the third Workgroup meeting once the legal text has been drafted, following the decision made around what should be included in the P442 solution. The Workgroup will review the legal text and review the views against the Terms of Reference.						
<b>Issue:</b>	<p>Licensed Suppliers are required to pay charges on the electricity they supply, but energy supplied by an exempt Supplier should not be subject to these charges. Licence exempt suppliers are not able to sign up to all the industry codes that a licensed Supplier can, and are therefore required to obtain certain services (including registration of their customers' Metering Systems) from a licensed Supplier. As a result, the portfolio of Metering Systems registered by a licensed Supplier may include both licenced and exempt supply. A Licensed Supplier should therefore be charged based on its total supply minus any exempt supply.</p> <p>There is currently no process that allows for correct allocation of appropriate chargeable volumes for Supplier Volume Allocation (SVA) Metering Systems where a portion should be exempt, and another portion should be licensable.</p>						
<b>Current Solution:</b>	The proposed solution is for a new third party role, the "Exempt Supply Calculation Agent" (ESCA), to be defined. The ESCA would calculate the volumes of licensed and exempt supply, and submit them to central BSC Systems, based on metered data provided by the HHDC or Supplier. The ESCA would be required to undergo a qualification process to ensure compliance with Settlement requirements.						
<b>History:</b>	<p>P442 was raised on 7 July 2022 by UC Energy Ltd. The Panel sent P442 to the Assessment Procedure Phase at its meeting on the 14 July 2022.</p> <p>Following comments made by the Panel, Elexon liaised with BEIS about their review into exempt supply and considered how the timings may impact this Modification.</p> <p>The first Workgroup meeting was held on 15 February 2023. At this meeting, the Workgroup considered the P442 Terms of Reference (ToR), as agreed by the Panel, and identified further topics that should be covered. The Workgroup also discussed the proposed solution and the current view against some aspects of the ToR.</p> <p>Given the delays to holding the first meeting, caused by the Modification being on hold while liaising with BEIS (as of that time, now DESNZ) about potential impacts from their review into exempt supply, as well as a combination of focussing on urgent Modifications and Proposer availability, the BSC Panel approved an extension to the Assessment Procedure of six months at the meeting on 11 April 2023.</p>						

<b>P443: To Cap NGESO Interconnector Trades at the Value of Lost Load (VoLL)</b>					<b>Update</b>		
<b>Date Raised:</b>	17 August 2022		<b>Proposer:</b>	Saltend Cogeneration Company Ltd			
<b>Target Implementation Date:</b>	2 November 2023		<b>Current Status:</b>	Report Phase			
<b>Progression:</b>	<b>IWA</b> Aug 22	<b>APC</b> Feb 23	<b>AR</b> Apr 23	<b>RPC</b> May 23	<b>DMR</b> Jun 23	<b>FMR</b> Jun 23	<b>I</b> Nov 23
<b>Latest Update:</b>	The P443 Report Phase Consultation was issued on 17 April 2023 for one calendar month (due to EBGL impacts). Two responses were received to the consultation, with one agreeing with the Panel that the change should be rejected and one disagreeing.						
<b>Next Event:</b>	The P443 Draft Modification Report will be presented to the BSC Panel at its meeting on 8 June 2023.						
<b>Issue:</b>	At the current time National Grid Electricity System Operator (NGESO) can trade at prices above the Value of Lost Load (VoLL – as defined in BSC Section T 1.12). This adds to customers' costs and sends a signal to the markets that customers are willing to buy power at any price. In a cost of living crisis the Proposer does not believe that the British public are prepared to buy energy at any price.						
<b>Current Solution:</b>	The solution will require NGESO to cap its offers to Interconnector Users to no more than VoLL, as defined in the BSC. These trades are included in the Balancing Services Adjustment Data (BSAD) file, which is sent from NGESO to Elexon. Elexon process the BSAD file for the purposes of Settlement and reporting.						
<b>History</b>	<p>P443 was raised by Saltend Cogeneration Company Ltd on 17 August 2022. The Proposer requested that the Modification be treated as Urgent. The Panel considered the request at an Urgent Panel meeting on 18 August 2022 and voted by majority to recommend to the Authority that P443 should be treated as an Urgent Modification Proposal.</p> <p>The Urgency letter was sent to the Authority on 19 August 2022 with a response requested by 25 August 2022.</p> <p>The Authority decided on 25 August 2022 that P443 should not be progressed on an urgent basis and P443 will now follow a standard Assessment Procedure.</p> <p>The first Workgroup meeting was held on 15 September 2022, to consider the issue, the proposed solution, and the Terms of Reference.</p> <p>The Panel approved a three month extension to the Assessment Procedure at its meeting on 13 October 2022.</p> <p>The second Workgroup meeting was held on 22 November 2022 to further develop and refine the proposed solution and further consider the Terms of Reference.</p> <p>The third Workgroup meeting was held on 7 December 2022 to discuss whether to raise an Alternative solution and further consider the solution(s). The Workgroup are minded to consult on three solution options.</p> <p>The fourth Workgroup meeting was held on 16 January 2023. The Workgroup provided their initial views on the Proposed solution.</p> <p>The fifth Workgroup meeting was held on 20 January 2023. The Workgroup provided their initial views on the two possible alternative solutions.</p> <p>The Assessment Procedure Consultation was issued for a 15 working days consultation period on 9 February 2023 with responses requested by 1 March 2023. The Panel approved a three month extension to the Assessment Procedure at its meeting on 9 February 2023.</p> <p>The sixth Workgroup meeting was held on 20 March 2023 to consider responses to the Assessment Procedure Consultation. The Workgroup decided not to raise an Alternative Modification and provided their final views on the proposed solution. As a result, two of the three additional months granted to conclude the Assessment Procedure will not be needed. The extra months were to allow for Alternatives to be progressed.</p>						

The P443 Assessment Report was presented to the BSC Panel at its meeting on 13 April 2023. The BSC Panel initially recommends rejection of P443.

**P444: Compensation for Suppliers and Virtual Lead Parties for Virtual Lead Party actions in the Balancing Mechanism** **Update**

<b>Date Raised:</b>	1 September 2022	<b>Proposer:</b>		Flexitricity			
<b>Target Implementation Date:</b>	7 November 2024	<b>Current Status:</b>		Report Phase			
<b>Progression:</b>	<b>IWA</b> Sep 22	<b>APC</b> Jan 23	<b>AR</b> Apr 23	<b>RPC</b> May 23	<b>DMR</b> Jun 23	<b>FMR</b> Jun 23	<b>I</b> Nov 24
<b>Latest Update:</b>	The Report Phase Consultations for P444 and P415 were issued on 17 April 2023, running for one calendar month due to identified impacts on the EBGL Article 18 Terms and Conditions. Three responses were received to the consultation, with two agreeing with the Panel that P444 should be approved and one disagreeing.						
<b>Next Event:</b>	The BSC Panel will consider P444 for a final time on 8 June 2023 before this Modification is passed to Ofgem for their decision.						
<b>Issue:</b>	Under BSC arrangements introduced by P344 'Project TERRE implementation into GB market arrangements' there is no mechanism for compensation of Parties who have been affected by Virtual Lead Party (VLP) activity in the Balancing Mechanism (BM). As a result, Suppliers are commercially impacted and left with a cost from the Balancing Mechanism that they cannot recover.						
<b>Current Solution:</b>	This Modification would amend BSC systems and processes to introduce a compensation mechanism for Suppliers and VLPs when a VLP takes a Bid or Offer in the BM, to ensure a level playing field and enable correct incentivisation of flexibility. Following P444 assessment, the Proposer and Workgroup believe that the compensation mechanism being developed for P415 should be applied to the BM as the solution for P444, and believe that an aligned decision should be made by Ofgem regarding the Proposed and Alternative solutions for each Modification.						
<b>History:</b>	<p>P444 was raised by Flexitricity on 1 September 2022.</p> <p>The Initial Written Assessment was presented to the BSC Panel at their meeting on 8 September 2022. The Panel submitted P444 to the Assessment Procedure for assessment by a Workgroup. The first P444 Workgroup meeting was held on 7 October 2022, in conjunction with a P415 Workgroup meeting.</p> <p>Workgroup meeting 2 was held on 7 December, where the Workgroup reviewed the legal text and prepared for the Assessment Consultation.</p> <p>Workgroup meeting 3 was held on 22 February to consider consultation responses.</p> <p>Workgroup meeting 4 was held on 28 March to conduct final voting and gather final views.</p> <p>The P444 Workgroup met for a final time on 28 March. The Proposer and Workgroup wish for P444 to align with P415 in terms of any Proposed and Alternative solutions, in order to allow for an aligned decision from Ofgem regarding the supplier compensation mechanism, therefore once the P415 Proposer "switched" the Proposed Solution with the alternative approach (allowing a majority of the group to raise a formal Alternative against this and bring multiple options to Ofgem to reduce the chance of delays) the P444 Proposer chose to take the same approach in order to ensure alignment. The Workgroup recommend that the Alternative Solution be approved.</p> <p>The P444 Assessment Report was presented to the BSC Panel on 13 April. The Panel initially recommend P444 is approved.</p>						

<b>P451: Updating BSC Black Start provisions and compensation arrangements to align with NGENSO's new approach to System Restoration</b>							<b>Update</b>	
<b>Date Raised:</b>	1 March 2023			<b>Proposer:</b>	NGESO			
<b>Target Implementation Date:</b>	TBC			<b>Current Status:</b>	Assessment Procedure			
<b>Progression:</b>	<b>IWA</b>	<b>APC</b>	<b>AR</b>	<b>RPC</b>	<b>DMR</b>	<b>FMR</b>	<b>I</b>	
	Mar 23	Jul 23	Sep 23	Sep 23	Nov 23	Nov 23	TBC	
<b>Latest Update:</b>	The first P451 Workgroup meeting was held on 5 May 2023. The Workgroup considered who should be eligible to claim the Black Start compensation.							
<b>Next Event:</b>	The second P451 Workgroup meeting will be held on 14 June 2023, where the Workgroup will discuss the other aspects of the Terms of Reference. This will include consideration of how the Black Start compensation process could work for non-BSC Parties, and how claims could be paid out by Elexon.							
<b>Issue:</b>	The National Grid Electricity System Operator (NGESO) is currently progressing GC0156 'Facilitating the implementation of the Electricity System Restoration Standard'. GC0156 facilitates the implementation of NGENSO's new approach to Black Start called System Restoration. It proposes to update all references to Black Start to System Restoration in the Grid Code. Unless a change is made to update the BSC, the BSC's Black Start processes will not align with the Grid Code if GC0156 is approved by Ofgem. Furthermore, NGENSO's new approach will allow Distributed Energy Resources (DERs) to be to be used as System Restoration Service Providers. These providers will be connected to a Distribution System and operated by BSC or non-BSC Parties. Currently, non-BSC parties cannot claim Black Start compensation.							
<b>Current Solution:</b>	To update all BSC references to "Black Start" to "System Restoration" and to amend BSC Section G 'Contingencies' to allow non-BSC parties who have a contract with NGENSO to provide System Restoration services to claim BSC Black Start compensation. The proposed solution is for Elexon to recoup claims payments from BSC Parties as part of their Black Start Reallocation Proportion.							
<b>History:</b>	P451 was raised on 1 March 2023. The Panel determined that P451 should progress to a Workgroup for assessment and set the timetable at its meeting on 9 March 2023.							

<b>P453: Amending the Metering Dispensation process, updating AMP/DMP in the CoPs and clarifying the relevant CoP</b>				<b>Update</b>	
<b>Date Raised:</b>	6 April 2023		<b>Proposer:</b>	UK Power Network	
<b>Target Implementation Date:</b>	2 November 2023		<b>Current Status:</b>	Report Phase	
<b>Progression:</b>	<b>Initial Assessment</b>	<b>RPC</b>	<b>DMR</b>	<b>FMR</b>	<b>I</b>
	<b>Apr 23</b>	<b>Apr 23</b>	<b>May 23</b>	<b>May 23</b>	<b>Nov 23</b>
<b>Latest Update:</b>	The Draft Modification Report was presented to the BSC Panel on 11 May 2023. As a Self-Governance Modification, the Panel made the decision to approve P453 for implementation on 2 November 2023 as part of the Standard November 2023 release, subject to the standard Self-Governance objection window.				
<b>Next Event:</b>	The Self-Governance objection window closes on 2 June. If no objections are received then the Modification will be implemented on 2 November 2023 as part of the Standard November 2023 release.				
<b>Issue:</b>	<p>This Modification seeks to progress two recommendations from <a href="#">Issue 93 'Review of the BSC metering Codes of Practice'</a>:</p> <ol style="list-style-type: none"> <li>1. Differences in metering point locations between the AMP and DMP can lead to Metering Dispensation requests, which require significant time and resources to process. If the metering point error, introduced by location, doesn't exceed overall accuracy limits, applying a Metering Dispensation may not be necessary, as it poses no significant risk to Settlement. When the error exceeds overall accuracy limits, compensation can be applied to the meter, but using a generic Metering Dispensation is still challenging and poses a Settlement risk if not validated.</li> <li>2. The relevant CoP for circuits embedded behind the Boundary Point Metering System or DMP specified in Appendix A of the CoPs is unclear, resulting in different interpretations and Metering Dispensation requests.</li> </ol>				
<b>Current Solution:</b>	<p>This Modification proposes to allow Elexon (BSCCo) to approve Metering Dispersations in limited circumstances. The proposed solution also involves updates to BSCP32 'Metering Dispensation' to explicitly state that a Metering Dispensation will not be necessary when the AMP and DMP don't match but overall accuracy of CoPs 1, 2, 3, 5 and 10 can still be met.</p> <p>The Modification also intends to clarify that the relevant CoP for an embedded circuit will be based on the rating of the circuit to be metered, not the CoP that would be relevant if the Metering Equipment were located at the DMP. Settlement integrity will be maintained by consulting affected parties and technical review from Metering Dispensation Review Group (MDRG), Electrical Loss Validation Agent (ELVA), and NETSO or relevant LDSO, as per the procedure outlined in BSCP32.</p>				
<b>History:</b>	<p>P453 was raised by UK Power Network (UKPN) on 6 April 2023.</p> <p>P453 was presented to the BSC Panel at its meeting on Thursday 13 April 2023. The Panel agreed that P453 should be sent straight to Report Phase for a 10 Working Day Consultation, with an initial recommendation to approve.</p> <p>The P453 Report Phase Consultation was issued on 17 April 2023, with responses due 28 April 2023. The RPC has now closed, with one response received.</p>				

P454: Removal of BSC obligations to provide BMRS Data via TIBCO and the High Grade Service						Update	
<b>Date Raised:</b>	13 April 2023			<b>Proposer:</b>	BSC Panel		
<b>Target Implementation Date:</b>	TBC			<b>Current Status:</b>	Assessment Procedure		
<b>Progression:</b>	<b>IWA</b> Apr 23	<b>APC</b> Aug 23	<b>AR</b> Oct 23	<b>RPC</b> Oct 23	<b>DMR</b> Nov 23	<b>FMR</b> Nov 23	<b>I</b> TBC
<b>Latest Update:</b>	The BSC Panel raised P454 at their meeting on 13 April 2023, where they agreed that it should be progressed to the Assessment Procedure for consideration by a Workgroup.						
<b>Next Event:</b>	Elexon have been conducting extra engagement to form a Workgroup, and, after a delay due to quoracy issues, intend to hold the first Workgroup meeting in late June.						
<b>Issue:</b>	<p>The BSC's High Grade Service and TIBCO software, based on 20-year-old legacy systems, can no longer be sustained efficiently and economically. The service presents significant barriers for new entrants due to lead time, operational costs, and bandwidth restrictions. As a result, there have been no new TIBCO users since 2014. Further, the ageing architecture causes operational issues, limits scaling, and imposes high costs on market participants.</p> <p><a href="#">Issue 95 'Assessing the continued use of TIBCO service as a source of data for market participants'</a> made a group recommendation to raise a BSC Modification to explore the removal of the obligation for Elexon to provide BMRA data through the High Grade Service.</p>						
<b>Current Solution:</b>	This Modification would remove the existing requirement within BSC Section V 'Reporting' for the Balancing Mechanism Reporting Agent (BMRA) to provide BMR Service (BMRS) data via the legacy High Grade Service, otherwise referred to as the TIBCO service.						

## II. Change Proposal Updates – up until decision

CP1574: Improving the use of the D0215 data flow in the relevant industry processes					Update
<b>Date Raised:</b>	4 April 2023		<b>Proposer:</b>	Elexon	
<b>Target Implementation Date:</b>	2 November 2023		<b>Current Status:</b>	Consultation	
<b>Progression:</b>	<b>PP</b> Apr 23	<b>CPC</b> May 23	<b>AR</b> Jun 23	<b>FR</b> Jun 23	<b>I</b> Nov 23
<b>Latest Update:</b>	CP1574 was issued for Industry Consultation on 11 April 2023 with responses invited by 10 May 2023. There were 12 responses received, with the majority supporting the change.				
<b>Next Event:</b>	CP1574 will be presented to SVG for decision on 6 June 2023.				
<b>Issue:</b>	The D0215 'Provision of Site Technical Details' <sup>1</sup> data flow is used in certain industry processes like installing new metering systems or changing suppliers. However, it is an unreliable source of Commissioning information, as data used in the Commissioning process is not typically included in it. Issue 99 'Review the use of the D0215 flow and its associated processes' was raised to determine how the use of the D0215 flow could be streamlined. The Proposer of Issue 99 suggests that although some data items within the D0215 flow can still be used, unnecessary time and effort is spent reviewing it. Despite this, the Proposer believes there is a strong case for retaining the D0215 flow.				
<b>Current Solution:</b>	This CP seeks to implement the recommendation from the Issue 99 Workgroup, which involves updating Balancing and Settlement Code Procedure (BSCP) 515 'Licensed Distribution' <sup>2</sup> and the Retail Energy Code (REC) Meter Operator Schedule 143 documents to streamline the use of the D0215 flow in its associated processes. The solution includes removing the D0215 flow from the 'New Supplier Volume Allocation (SVA) Metering System connection process' and 'Change of Measurement Class (COMC) process', and retaining the D0215 for general investigative processes (e.g. Current Transformer (CT)/ Voltage Transformer (VT) mismatch issues).				
<b>History:</b>	CP1574 was raised by Elexon on 4 April 2023. The CP Progression Paper was presented to the Supplier Volume Allocation Group (SVG) at its meeting on 4 April 2023.				



<b>CP1575: Permitting the use of busbar voltage transformers within metering Codes of Practice 1 and 2</b>					<b>Update</b>
<b>Date Raised:</b>	4 April 2023		<b>Proposer:</b>	Elexon	
<b>Target Implementation Date:</b>	2 November 2023		<b>Current Status:</b>	Consultation	
<b>Progression:</b>	<b>PP</b> Apr 23	<b>CPC</b> May 23	<b>AR</b> Jun 23	<b>FR</b> Jun 23	<b>I</b> Nov 23
<b>Latest Update:</b>	CP1575 was issued for Industry Consultation on 11 April 2023 with responses invited by 10 May 2023. One response was received, which was in support of the change.				
<b>Next Event:</b>	CP1575 will be presented to SVG for decision on 6 June 2023.				
<b>Issue:</b>	<p>The size and weight of voltage transformers (VTs) used at Offshore wind farm power transformer platforms, which are subject to Offshore Transmission Owner (OFTO) arrangements, can significantly affect the cost and complexity of development. Under Code of Practice (CoP) 2 'The metering of circuits with a rated capacity not exceeding 100 MVA for Settlement purposes, where Metering Equipment is installed at the wind turbine string array (string) level, the current requirement is to have a separate VT per string/circuit. Issue 87 'Busbar voltage transformer metering for Offshore wind farms under OFTO arrangements' proposed an alternative arrangement that reduces the need for multiple VTs at the string level on Offshore wind farm power transformer platforms by allowing the placement of VTs at the busbar. As well as reducing the number of VTs required, this arrangement offers increased redundancy than the status quo and enables a higher availability of metered data for wind farms.</p> <p>To recognise this configuration under the BSC, a change to CoP2 is necessary to allow busbar VTs to be used at the string level. CoP1 'The metering of circuits with a rated capacity exceeding 100 MVA for Settlement purposes' will also need to be amended to futureproof the solution as the size of wind turbine generators (WTGs) increases. Elexon is raising this CP on behalf of the Issue 87 Workgroup to progress their recommendation.</p>				
<b>Current Solution:</b>	To update CoPs 1 and 2 to allow busbar VTs to be used. The solution will apply to onshore sites (generally), as well as Offshore wind farms, in line with the recommendations of the Issue 87 Workgroup.				
<b>History:</b>	<p>CP1575 was raised by Elexon on 4 April 2023.</p> <p>The CP Progression Paper was presented to the Imbalance Settlement Group (ISG) at its meeting on 4 April 2023.</p>				

<b>CP1576: Creation of a new Interconnector Fuel Type Category for the Viking Link Interconnector</b>				<b>Update</b>	
<b>Date Raised:</b>	4 April 2023	<b>Proposer:</b>	National Grid		
<b>Target Implementation Date:</b>	2 November 2023	<b>Current Status:</b>	Consultation		
<b>Progression:</b>	<b>PP</b> Apr 23	<b>CPC</b> May 23	<b>AR</b> Jun 23	<b>FR</b> Jun 23	<b>I</b> Nov 23
<b>Latest Update:</b>	CP1576 was issued for Industry Consultation on 11 April 2023 with responses invited by 10 May 2023. One response was received, which was in support of the change.				
<b>Next Event:</b>	CP1576 will be presented to the ISG on 6 June 2023 to seek feedback before presenting to the Panel for decision on 8 June 2023, as Panel approval is required for this new 'Fuel Type Category'.				
<b>Issue:</b>	<p>The Viking Link Interconnector is currently under construction and due to be commissioned in October 2023. The commercial operation date is expected shortly after and while the date still needs confirmation, both Elexon and National Grid Electricity System Operator (NGESO) aim to complete the system changes in November 2023 BSC Release to ensure reporting of the data to the market. Changes are needed to the Balancing Mechanism Reporting Service (BMRS) to ensure data relating to the new Viking Link Interconnector is provided to market participants alongside existing data relating to Settlement arrangements in the Great Britain (GB) electricity market.</p> <p>The BSC requires a separate 'Fuel Type Category' to be defined for each Interconnector for reporting purposes. It also requires the Panel to approve all new fuel type categories. Therefore, for the Viking Link Interconnector data to be published on the BMRS, BSC Central System changes are needed, as is Panel approval for this new 'Fuel Type Category'</p>				
<b>Current Solution:</b>	The solution requires the new Fuel Type Category to be recognised within BSC and the Code Subsidiary Documents (CSDs) and the data reported through the BMRS service as defined in BSC Section V 'Reporting', Balancing Mechanism Reporting Agent (BMRA) Service Description and the BMRA User Requirements Specifications. The service is currently fulfilled by the existing BMRS application and the replacement BMRS application labelled the 'Insights Solution'.				
<b>History:</b>	<p>CP1576 was raised by National Grid on 4 April 2023.</p> <p>The CP Progression Paper was presented to the Imbalance Settlement Group (ISG) at its meeting on 4 April 2023.</p>				

<b>CP1577: To clarify the sending of a D0151 is required for all COS NHH loss processes</b>					<b>New</b>
<b>Date Raised:</b>	2 May 2023		<b>Proposer:</b>	EDF Energy	
<b>Target Implementation Date:</b>	2 November 2023		<b>Current Status:</b>	Consultation	
<b>Progression:</b>	<b>PP</b> May 23	<b>CPC</b> Jun 23	<b>AR</b> Jul 23	<b>FR</b> Jul 23	<b>I</b> Nov 23
<b>Latest Update:</b>	<p>CP1577 was raised by EDF Energy on 2 May 2023.</p> <p>The CP Progression Paper was presented to the Supplier Volume Allocation Group (SVG) at its meeting on 2 May 2023.</p> <p>CP1577 was issued for Industry Consultation on Tuesday 9 May 2023 with responses invited by 5pm on Tuesday 6 June 2023.</p>				
<b>Next Event:</b>	Following the closure of the consultation, CP1577 will be presented to SVG for decision on 4 July 2023.				
<b>Issue:</b>	<p>There is a requirement in BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' for the old (outgoing) Supplier to send a D0151 'Termination of Appointment or Contract by Supplier' to terminate their Non Half Hourly Data Collector (NHHDC) appointment on Change of Supplier (CoS). However, the positioning of clause 3.2.6.4(a) implies that this is only required for non-Data Communications Company (DCC) serviced Metering Systems, whereas this should be a requirement for all Metering Systems. Without the D0151, the Non Half Hourly (NHH) Data Collector may not be notified of the termination of contract or appointment by the Supplier for the relevant Metering System.</p>				
<b>Current Solution:</b>	This CP proposes a minor change to BSCP504 that that will clarify that clause 3.2.6.4(a) applies to all Metering Systems.				

<b>CP1578: Amendments to BSCP128 to enable Embedded LDSOs to calculate and submit Site Specific LLFs as required</b>					<b>New</b>
<b>Date Raised:</b>	2 May 2023		<b>Proposer:</b>	Elexon	
<b>Target Implementation Date:</b>	2 November 2023		<b>Current Status:</b>	Consultation	
<b>Progression:</b>	<b>PP</b> May 23	<b>CPC</b> Jun 23	<b>AR</b> Jul 23	<b>FR</b> Jul 23	<b>I</b> Nov 23
<b>Latest Update:</b>	<p>CP1578 was raised by Elexon on 2 May 2023.</p> <p>The CP1578 Progression Paper was presented to SVG and ISG on 2 May 2023.</p> <p>CP1578 was issued for Industry Consultation on Tuesday 9 May 2023 with responses invited by 5pm on Tuesday 6 June 2023.</p>				
<b>Next Event:</b>	Following the closure of the consultation, CP1578 will be presented to SVG and ISG for decision on 4 July 2023.				
<b>Issue:</b>	<p>Line Loss Factors, which are used to account for losses on the Distribution Networks, are calculated and submitted to the BSC Company (BSCCo) by Licensed Distribution System Operators (LDSOs). Embedded LDSOs usually Mirror the Line Loss Factors (LLFs) of the Host LDSO, however, in certain circumstances they are required to calculate Site Specific LLFs. Several issues have been identified with the current process for calculating Site Specific LLFs that could prevent Embedded LDSOs from successfully completing their submissions.</p>				
<b>Current Solution:</b>	This CP proposes updates to remove issues that may stop Embedded LDSOs from submitting Site Specific LLFs. These updates will define the process for submitting Site Specific LLFs, including establishing deadlines and requirements for the Embedded and Host LDSOs.				

<b>CP1579: Allowing HHDCs to undergo Protocol Approval before completing Qualification</b>				<b>New</b>	
<b>Date Raised:</b>	2 May 2023	<b>Proposer:</b>	Elexon		
<b>Target Implementation Date:</b>	2 November 2023	<b>Current Status:</b>	Consultation		
<b>Progression:</b>	<b>PP</b> May 23	<b>CPC</b> Jun 23	<b>AR</b> Jul 23	<b>FR</b> Jul 23	<b>I</b> Nov 23
<b>Latest Update:</b>	<p>CP1579 was raised by Elexon on 02 May 2023.</p> <p>CP1579 Progression Paper was presented to the Supplier Volume Allocation Group (SVG) and Imbalance Settlement Group (ISG) at its meetings on 02 May 2023. The committees agreed to progress the CP to the Consultation phase.</p> <p>CP1579 was issued for Industry Consultation on Tuesday 09 May 2023 with responses invited by 5pm on Tuesday 6 June 2023.</p>				
<b>Next Event:</b>	Following the closure of the consultation, CP1579 will be presented to SVG and ISG for decision on 4 July 2023.				
<b>Issue:</b>	<p>The BSCP601 'Metering Protocol Approval and Compliance Testing' requires Asset Metering Virtual Lead Parties (AMVLPs), Half Hourly Data Collectors (HHDCs), Asset Metering Half Hourly Data Collectors (AMHHDCs) and other Asset Metering Equipment users to be Qualified before applying for Compliance Testing and Protocol Approval. This results in a time gap between when the HHDCs and AMHHDCs are able to operate in the market and completing Protocol Approval. This could also result in a risk that HHDCs accept appointments before completing Protocol Approval leading to them operating using a Protocol that they have not yet received Protocol Approval for.</p>				
<b>Current Solution:</b>	This Change Proposal proposes to allow Half Hourly Data Collectors (HHDCs) and Asset Metering Half Hourly Data Collectors (AMHHDCs) to undergo Protocol Approval before or during the Qualification process.				

**CP1580: Housekeeping CP to make the CSDs gender neutral to align with BSC also to correct BSCP602 in reference with P419**

**New**

<b>Date Raised:</b>	10 May 2023	<b>Proposer:</b>		Elexon	
<b>Target Implementation Date:</b>	29 June 2023	<b>Current Status:</b>		Consultation	
<b>Progression:</b>	<b>PP</b> May 23	<b>CPC</b> Jun 23	<b>AR</b> Jul 23	<b>FR</b> Jul 23	<b>I</b> Nov 23
<b>Latest Update:</b>	<p>CP1580 was raised as a Housekeeping CP by Elexon on 10 May 2023. The CP1580 Assessment Report was presented to the BSC Panel on 11 May 2023. The BSC Panel agreed that CP1580 is a Housekeeping change and approved it for implementation on 29 June 2023 as part of the June 2023 BSC Release.</p>				
<b>Next Event:</b>	<p>BSC Parties and Party Agents have 15 Working Days to object to treating CP1580 as a Housekeeping CP. This objection period will close at 5pm on Friday 2 June 2023.</p>				
<b>Issue:</b>	<p>The current versions of the Balancing and Settlement Code (BSC) Code's Subsidiary Documents (CSDs) contain 198 cases of gendered pronouns across 39 documents, such as "he, his, or him". There is a disparity between the Code's supporting documents and the present-day norm for legal drafting, which involves employing gender-neutral language and references.</p> <p>Additionally, Elexon are using this opportunity to correct some minor inconsistencies that exist between one of the CSDs and the previously implemented P419 'Extension of P383 to include non-final Demand'.</p>				
<b>Current Solution:</b>	<p>The approved solution for this Change Proposal entails adding the housekeeping changes as necessary. This will include correcting BSCP602 'SVA Metering System &amp; Asset Metering System Register' to reflect the implementation of P419 as well as modifying the CSDs to incorporate gender-neutral language, aligning them with contemporary legal drafting practices.</p>				

### III. Issue Updates

<b>Issue 101: Ongoing Governance, Funding and Operation of the MHHS DIP</b>			<b>Update</b>
<b>Date Raised:</b>	13 July 2022	<b>Proposer:</b>	Elexon
<b>Latest Update:</b>	The eighth Issue 101 Workgroup meeting was held on 25 May. The Workgroup considered DIP governance arrangements, and were presented an overview of the DIP enduring arrangements.		
<b>Next Event:</b>	The Workgroup are reviewing the draft business requirements, which will be issued for industry consultation week commencing 12 June 2023.		
<b>Issue:</b>	<p>An Event Driven Architecture (EDA) platform is being developed as a key component to support delivery of the Market-wide Half Hourly Settlement (MHHS) Target Operating Model (TOM) and will be able to respond to the increase in volume and frequency of data more quickly than the current arrangements. The Data Integration Platform (DIP) is the delivery mechanism for the MHHS EDA.</p> <p>Issue 101 intends to define the requirements and principles for the on-going DIP arrangements that can be included in the subsequent BSC Modification, including the ongoing governance, funding and operation of the DIP.</p>		

<b>Issue 103: Meter Registrants and Settlement Risk – A New Way</b>			<b>No Update</b>
<b>Date Raised:</b>	24 August 2022	<b>Proposer:</b>	Western Power Distribution
<b>Latest Update:</b>	The fourth Issue 103 Workgroup meeting was held on 10 March. The Workgroup reviewed the action log and discussed SVAA Tolerance Checks, estimation of CVA data and the BSC Audit. The Workgroup agreed a recommendation to raise changes to mitigate risk of high volume metering error.		
<b>Next Event:</b>	The fifth Workgroup meeting will aim to review the Workgroup views against the Terms of Reference, agree recommendations, and agree ways of working going forward regarding any outstanding actions. The Workgroup meeting will be scheduled for July, once Elexon has progressed the actions from the Workgroup meetings.		
<b>Issue:</b>	<p>The Proposer believes that there would be value in reviewing existing controls for Settlement error prevention. It is critical to the Proposer that we address these problems prior to the Settlement timetable being shortened by Market-wide Half Hourly Settlement (MHHS) as the opportunities to readdress will be reduced thereafter.</p> <p>The Settlement system is crucial to the smooth operation of the GB energy market. Data used within that system is fundamental to Settlement accuracy. Preventative and detective assurance of the Settlement data is required at all stages of Settlement from Metering and Registration onwards to maintain accuracy and reduce the variation of data at later stages of the Settlement process. This assurance is required as Settlement errors can have a significant financial impact on Parties where they have over/under paid Settlement charges.</p>		

<b>Issue 105: Further considerations following implementation of Modification P448</b>		<b>Update</b>	
<b>Date Raised:</b>	22 December 2022	<b>Proposer:</b>	Elexon
<b>Latest Update:</b>	The fourth Issue 105 Meeting was held on 11 April 2023. The Workgroup discussed the impact to cash-out price and reviewed the draft redlined changes to BSCP18 and to the Network Gas Supply Emergencies Guidance Note. They agreed that a CP should be raised to update BSCP18.		
<b>Next Event:</b>	The fifth Issue 105 Meeting will be held on 31 May 2023. The Workgroup will confirm their recommendations, including deciding whether a Code Change should be recommended to address the unintended impacts to cash-out prices following the implementation of P448.		
<b>Issue:</b>	<p>Modification P448 'Protecting Generators subject to Firm Load Shedding during a Gas Supply Emergency from excessive Imbalance Charges' was approved by Ofgem on 6 December 2022 and implemented on 7 December 2022. Ofgem approved the Alternative Modification.</p> <p>As part of Ofgem's decision letter, and further to Workgroup discussion, some consequential impacts of P448 were highlighted that require further consideration. Issue 105 has been raised to explore these consequential impacts and make a recommendation as to whether further industry change is required.</p> <p>The topics that the Issue will consider are:</p> <ul style="list-style-type: none"> <li>• Unintended impacts to cash-out prices;</li> <li>• Time limiting the P448 solution;</li> <li>• Whether there is any increased risk of generator behaviour not in line with 'Good Industry Practice';</li> <li>• How the P448 solution interacts with Gas Operating Margins contracts;</li> <li>• If further guidance documentation is required for P448.</li> </ul> <p>The Issue Group will also be asked to identify any additional topics that they think need to be considered as part of this Issue.</p>		

<b>Issue 106: Review of BSC Credit Cover Arrangements</b>		<b>Update</b>	
<b>Date Raised:</b>	13 January 2023	<b>Proposer:</b>	Elexon
<b>Latest Update:</b>	The second Issue 106 Workgroup meeting was held on 23 March 2023. The Workgroup discussed the proposed long-term solution and reviewed proposed improvements to the current processes.		
<b>Next Event:</b>	The third Issue 106 Workgroup meeting will be held on 15 June. The Workgroup will consider the pending actions from the previous meetings and the proposals made by Outlook Energy/ EPEX and ECC.		
<b>Issue:</b>	<p>The Credit Committee has requested that Elexon review the Credit Cover arrangements with industry experts through an Issue Group. This is in response to key concerns about credit being sufficient to protect the market from Supplier Failure while also not being an onerous burden on market participants.</p> <p>Existing Credit Cover arrangements have not been sufficient to cover outstanding Trading Charges in most market failures in the past. This has led to debt mutualisation of over £71m through the Default Funding Share accumulated over the last five years. These arrangements do not consider the additional BSC Trading Charges that collateral may be required to cover if a Supplier has not sufficiently balanced their Settlement position.</p> <p>There is a direct link between market prices for electricity and Credit Cover requirements. As market prices fluctuate, the amount of credit to be lodged with the BSC also fluctuates. Further, as the market goes through a period of change to meet future consumer needs, such as changes being introduced as part of Market-wide Half Hourly Settlement (MHHS), now is a good time to review whether wider credit calculations remain fit for purpose.</p> <p>The Workgroup will consider five work streams:</p> <ul style="list-style-type: none"> <li>• What should Credit Cover be used for;</li> <li>• Data and Timeframes;</li> <li>• Fairness and Equality;</li> <li>• Impacts of lodging Credit; and</li> <li>• Credit Governance.</li> </ul>		

<b>Issue 107: Review of BSC Section N 'Clearing, Invoicing &amp; Payment</b>		<b>New</b>	
<b>Date Raised:</b>	5 May 2023	<b>Proposer:</b>	Elexon
<b>Latest Update:</b>	Issue 107 was raised by Elexon on 5 May 2023.		
<b>Next Event:</b>	The first Workgroup meeting will be held on 6 June 2023. The Workgroup will consider the background to Issue 107 and the changes required to BSC Section N.		
<b>Issue:</b>	<p>Due to BSC Section N 'Clearing, Invoicing &amp; Payment' being written over 20 years ago, it is believed that some sections within it may now be redundant and no longer align with modern ways of working (e.g. invoicing and banking practices). This results in some inefficiencies, unnecessary rules and constraints that prevent opportunities and additional benefits from being sought and realised.</p> <p>A key component of the approved Elexon strategy is digitisation. This includes the possibility of replacing/updating the existing FAA systems. It would seem the right time for a review of BSC Section N which could identify potential opportunities that could streamline processes and improve efficiencies at the same time for the benefit of BSC Parties.</p> <p>This Issue would review BSC Section N to identify which areas and associated processes are currently pain points experienced by the Industry. It would identify solutions to address these to improve efficiency and the user experience for these processes.</p>		



## IV. Progression of Modifications – up until implementation

<b>Key</b>	<b>Initial Written Assessment:</b>	<b>Assessment Procedure:</b> AR: Assessment Report APC: Assessment Procedure Consultation	<b>Report Phase:</b> RPC: Report Phase Consultation DMR: Draft Modification Report FMR: Final Modification Report	<b>WA:</b> With Authority Awaiting Decision	<b>AI:</b> Awaiting Implementation	<b>I:</b> Implementation	<b>CBA:</b> Cost/Benefit Analysis
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Note: The progression plans below reflect the approved timetables.

Mod	Title	Proposer	Date Raised	Urgent		Apr	May	Jun	Jul	Aug	Sep	Oct
P395	Excluding generators from calculation of EMR Supplier Charges	Centrica	7 Nov 2019	No								
P412	Ensuring non-BM Balancing Services providers pay for non-delivery imbalances at a price that reflects the real-time value of energy	NGESO	3 Sep 2020	No								
P415	Facilitating access to wholesale markets for flexibility dispatched by Virtual Lead Parties	Enel X	30 Sep 2020	No		AR	RPC	DMR/ FMR	WA			
P432	Half Hourly Settlement for CT Advanced Metering Systems	Npower Commercial Gas	2 Dec 2021	No								
P441	Creation of Complex Site Classes	Green Energy	14 Jul 2022	No			APC		AR	RPC	DMR/ FMR	

Mod	Title	Proposer	Date Raised	Urgent		Apr	May	Jun	Jul	Aug	Sep	Oct
P442	Reporting chargeable volumes for exempt and licensed supply	UC Energy Ltd	7 Jul 2022	No							APC	
P443	To Cap NGESO Interconnector Trades at the Value of Lost Load (VoLL)	Saltend Cogeneration Company Ltd	17 Aug 2022	No		AR	RPC	DMR/ FMR	WA			
P444	Compensation for Virtual Lead Party actions in the Balancing Mechanism	BSC Panel	8 Sep 2022	No		AR	RPC	DMR/ FMR	WA			
P451	Updating BSC Black Start provisions and compensation	NGESO	1 Mar 2023	No					APC		AR	RPC
P452	Replacement of the EBRS for non-domestic customers with the EBDS	NGESO	24 Mar 2023	Yes		DMR/ FMR/ I						
P453	Metering Dispensation process improvements and clarification to the CoPs	UK Power Network	6 Apr 2023	No		IWA / RPC	DMR/ FMR	AI				
P454	Removal of BSC obligations to provide BMRS Data via TIBCO and the High Grade Service	BSC Panel	13 Apr 2023	No		IWA				APC		AR

## V. Progression of Change Proposals – up until implementation

<b>Key</b>	<b>Assessment Procedure:</b> PP: Progression Paper	<b>CPC:</b> Change Proposal Circular Consultation	<b>Committee Decision:</b> AR: Assessment Report FR: Final CP Report	<b>AI:</b> Awaiting Implementation	<b>I:</b> Implementation
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Mod	Title	Proposer	Date Raised	Apr	May	Jun	Jul	Aug	Sep	Oct
CP1558	New Registration data items and processes to support the MHHS transition	Elexon	16 Feb 2022			I				
CP1568	Inclusion of new LDSO-mastered SMRS data items	Elexon	6 Sep 2022			I				
CP1571	Clarify the number of Meter measuring elements and measurement transformers	Elexon	1 Nov 2022			I				
CP1572	Specifying the requirements to provide SLDs for HV and EHV sites	Elexon	1 Nov 2022			I				
CP1574	Improving the use of the D0215 data flow in the relevant industry processes	Elexon	4 Apr 2023	PP/CPC		AR/FR	AI			
CP1575	Permitting the use of busbar voltage transformers within metering Codes of Practice 1 and 2	Elexon	4 April 2023	PP/CPC		AR/FR	AI			
CP1576	Creation of a new Interconnector Fuel Type Category for the Viking Link Interconnector	National Grid	4 April 2023	PP/CPC		AR/FR	AI			

Mod	Title	Proposer	Date Raised	Apr	May	Jun	Jul	Aug	Sep	Oct
CP1577	To clarify the sending of a D0151 is required for all COS NHH loss processes	EDF Energy	2 May 2023		PP/ CPC		AR/ FR			
CP1578	Enabling Embedded LDSOs to submit Site Specific LLFs	Elexon	2 May 2023		PP/ CPC		AR/ FR			
CP1579	Allowing HHDCs to undergo Protocol Approval before completing Qualification	Elexon	2 May 2023		PP/ CPC		AR/ FR			
CP1580	Making the Code Subsidiary Documents (CSDs) gender neutral and Housekeeping	Elexon	10 May 2023		AR/ FR	I				

## VI. BSC Releases Road Map

The tables below summarise the scope of each BSC Release. Further information can be found on the [Releases](#) page of our website.

June 2023 Release			
Change Number	Title of Change	BSC Central Systems/Document only impacts	Current Status of Change
CP1580	Housekeeping CP to correct BSCP602 in reference with P419 and also make the CSDs gender neutral to align with BSC	Document Only	6. Authority Decision / SG Appeal Window
CP1572	Specifying the requirements to provide Single Line Diagrams (SLDs) for High Voltage (HV) and Extra High Voltage (EHV) sites in the relevant CoPs, to ensure assurance is maintained, especially in scenarios where the AMP is not aligned with the DMP.	Document Only	7. Implementation Phase
CP1571	Clarifying the requirements for the number of measuring elements in the relevant CoPs	Document Only	7. Implementation Phase
CP1568	Inclusion of new LDSO-mastered SMRS data items in the SVAData Catalogue, the REC EMAR Data Specification and BSCP604	Document Only	7. Implementation Phase
CP1558	New Registration data items and processes to support the transition to MHHS	Document Only	7. Implementation Phase

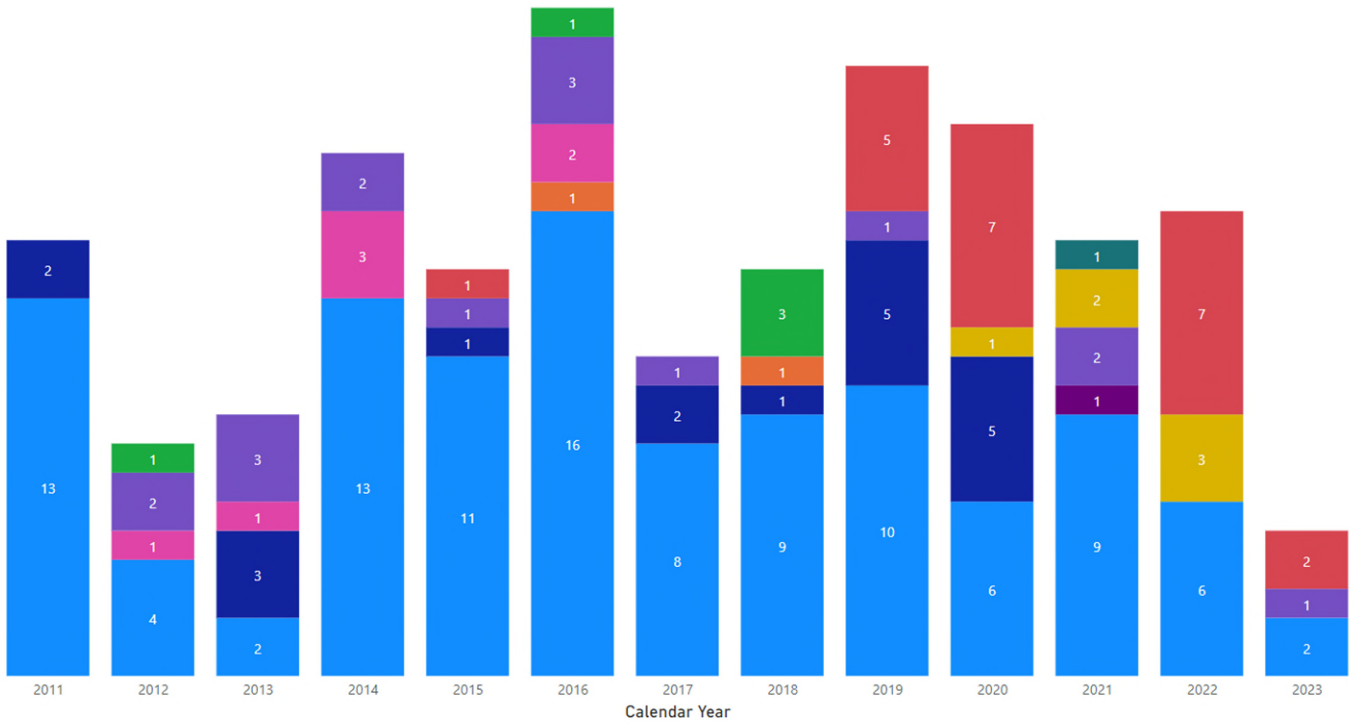
November 2023 Release			
Change Number	Title of Change	BSC Central Systems/Document only impacts	Current Status of Change
P453	Amending Metering Dispensation Process, Updating AMP/DMP in CoPs and Clarifying the Relevant CoP	Document Only	6. Authority Decision / SG Appeal Window
P395	Final Consumption Levies (FCLs)	System	7. Implementation Phase

TBC Release Date				
Change Number	Title of Change	BSC Central Systems/Document only impacts	Current Status of Change	Target Implementation Date
P412	Ensuring non-BM Balancing Services providers pay for non-delivery imbalances at a price that reflects the real-time value of energy	System	4. Assessment / Consultation Phase	TBC
<b>P415</b>	<b>Facilitating access to wholesale markets for flexibility dispatched by Virtual Lead Parties</b>	<b>System</b>	<b>5. Report / Panel Decision Phase</b>	<b>Nov 24</b>
P432	Half Hourly Settlement for CT Advanced Meters	Document Only	6. Authority Decision / SG Appeal Window	3 months after Authority decision
<b>P441</b>	<b>Creation of Complex Site Classes</b>	<b>Document Only</b>	<b>4. Assessment / Consultation Phase</b>	<b>TBC</b>
P442	Reporting to EMRS of chargeable volumes for SVA Metering Systems that record both exempt and licensed supply	System	4. Assessment / Consultation Phase	TBC
<b>P443</b>	<b>To Cap NGENSO Interconnector Trades at the Value of Lost Load (VoLL)</b>	<b>System</b>	<b>5. Report / Panel Decision Phase</b>	<b>Nov 23</b>
P444	Compensation for Virtual Lead Party actions in the Balancing Mechanism	System	5. Report / Panel Decision Phase	Nov 24
<b>P451</b>	<b>Updating BSC Black Start provisions and compensation arrangements to align with NGENSO's new approach to System Restoration</b>	<b>System</b>	<b>4. Assessment / Consultation Phase</b>	<b>TBC</b>
CP1578	Enabling Embedded LDSOs to calculate and submit Site Specific LLFs as required	Document Only	4. Assessment / Consultation Phase	Nov 23
<b>CP1577</b>	<b>To clarify the sending of a D0151 is required for all change of supplier NHH loss processes</b>	<b>Document Only</b>	<b>4. Assessment / Consultation Phase</b>	<b>Nov 23</b>
CP1576	Creation of a new Interconnector Fuel Type Category for the Viking Link Interconnector	System	4. Assessment / Consultation Phase	Nov 23
<b>CP1575</b>	<b>Permitting the use of busbar voltage transformers within metering Code of Practice 1 and 2</b>	<b>Document Only</b>	<b>4. Assessment / Consultation Phase</b>	<b>Nov 23</b>
CP1574	This CP was recommended by the Issue 99 Workgroup to streamline the use of the D0215 flow in the relevant industry process.	Document Only	4. Assessment / Consultation Phase	Nov 23

# VII. Modification Trend Chart

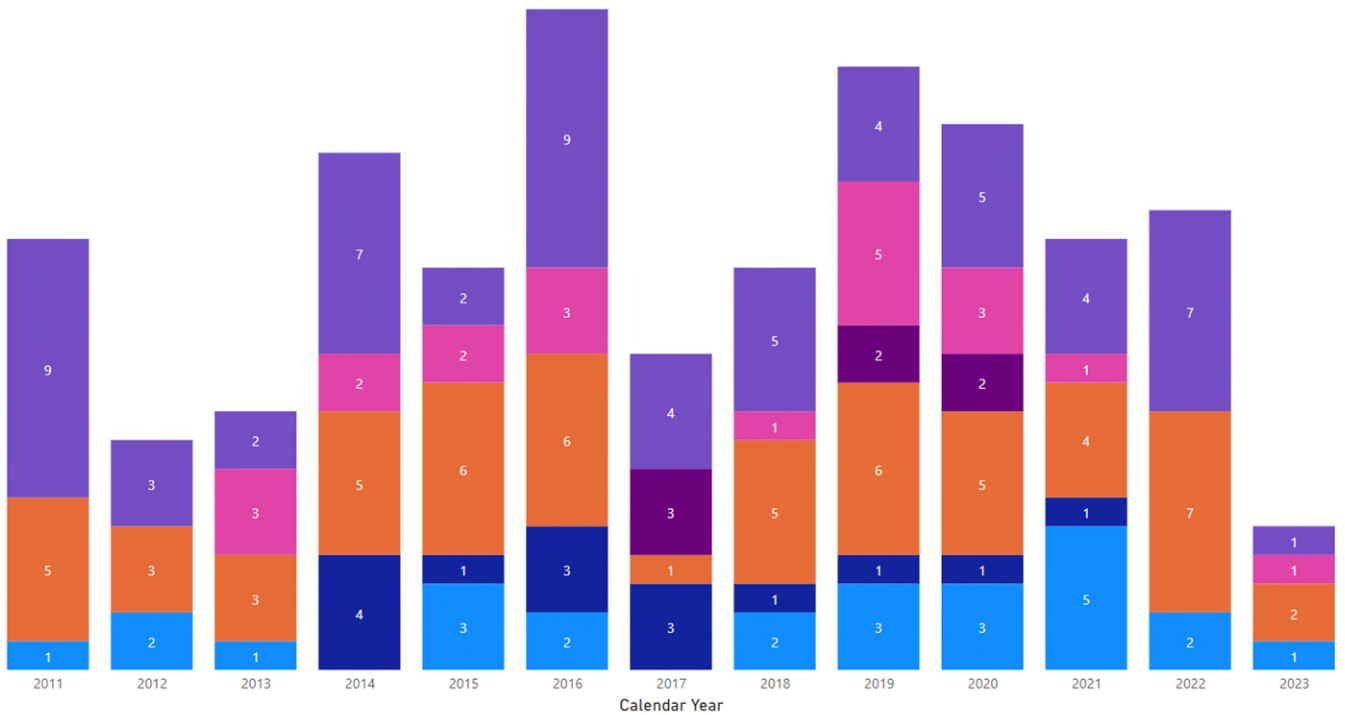
What's driving the raising of Modifications?

Driver ● Defect ● Europe ● Legislation ● Legislation (inc. CMA) ● Ofgem ● Other Code ● SCR ● Strategic Improvement ● Workgroup / Committee / Issue ● Workgroup/Committee



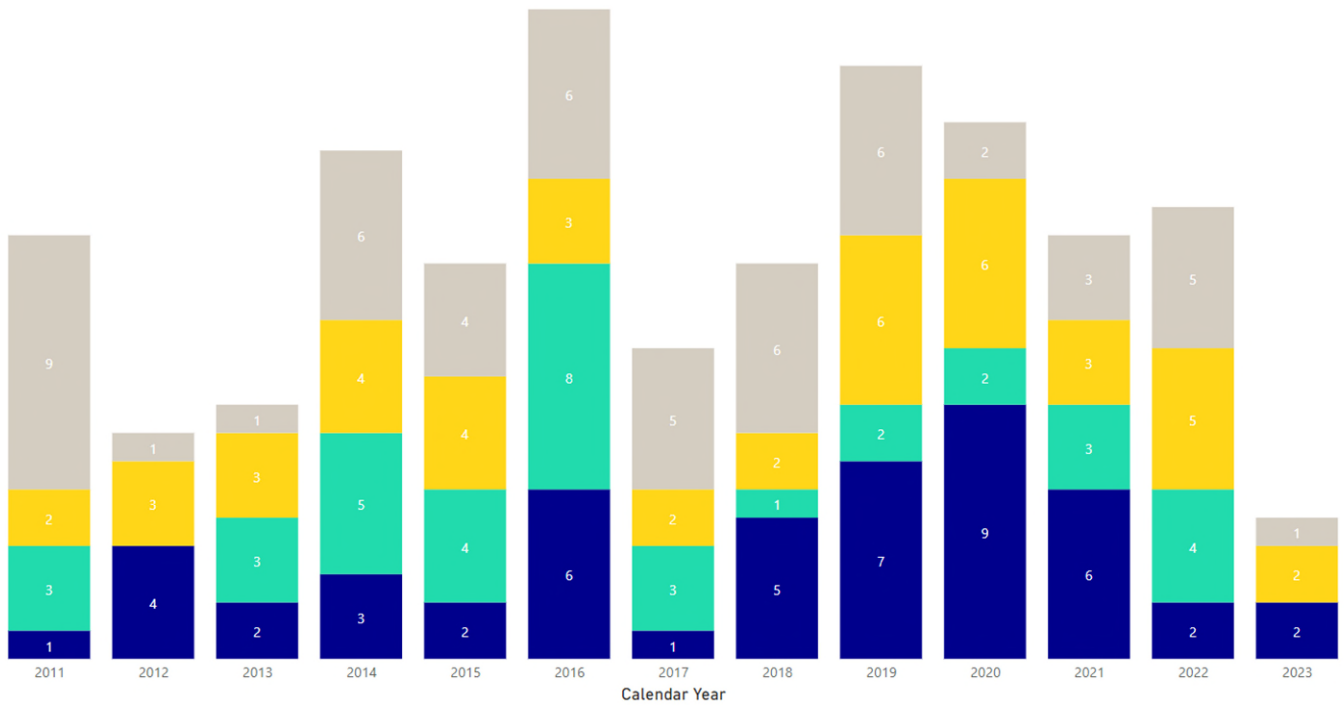
What type of Modifications are being raised?

Category L1 ● Assurance ● Credit ● Governance ● Registration ● Reporting ● Settlement



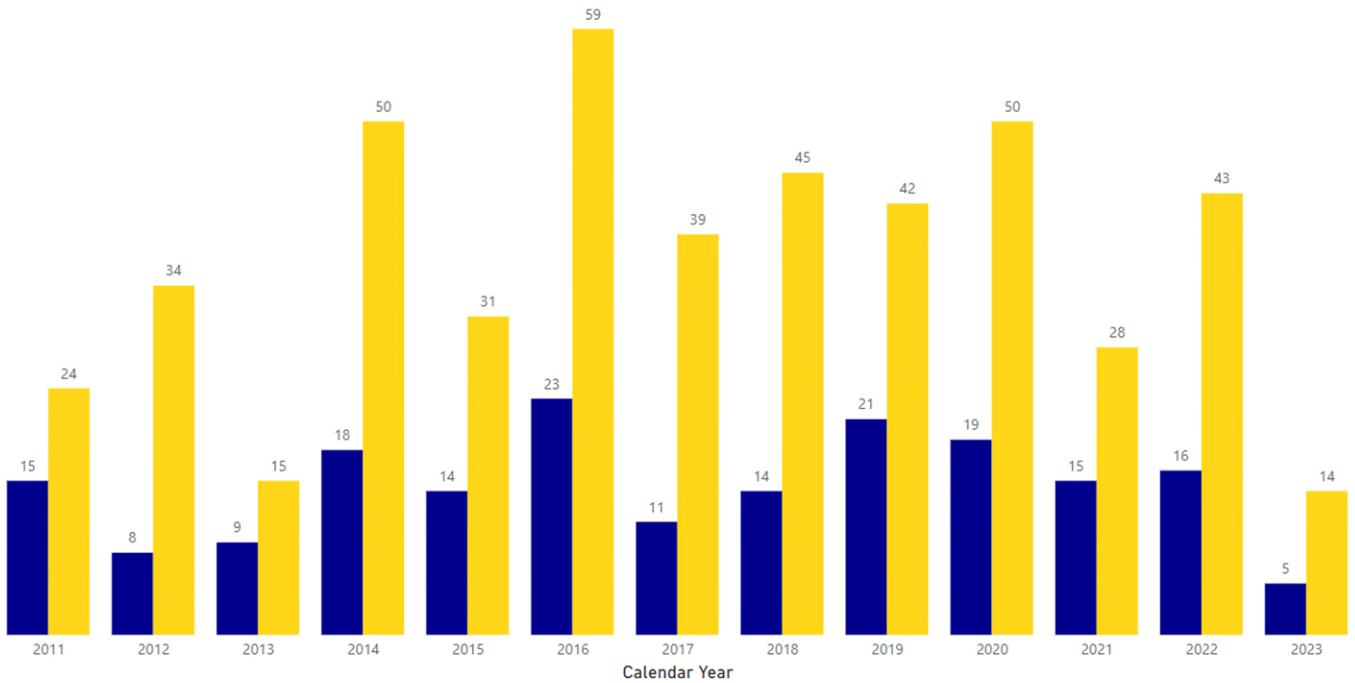
### Who is raising Modifications?

Raiser ● BSC Panel ● Incumbents ● National Grid ● Other



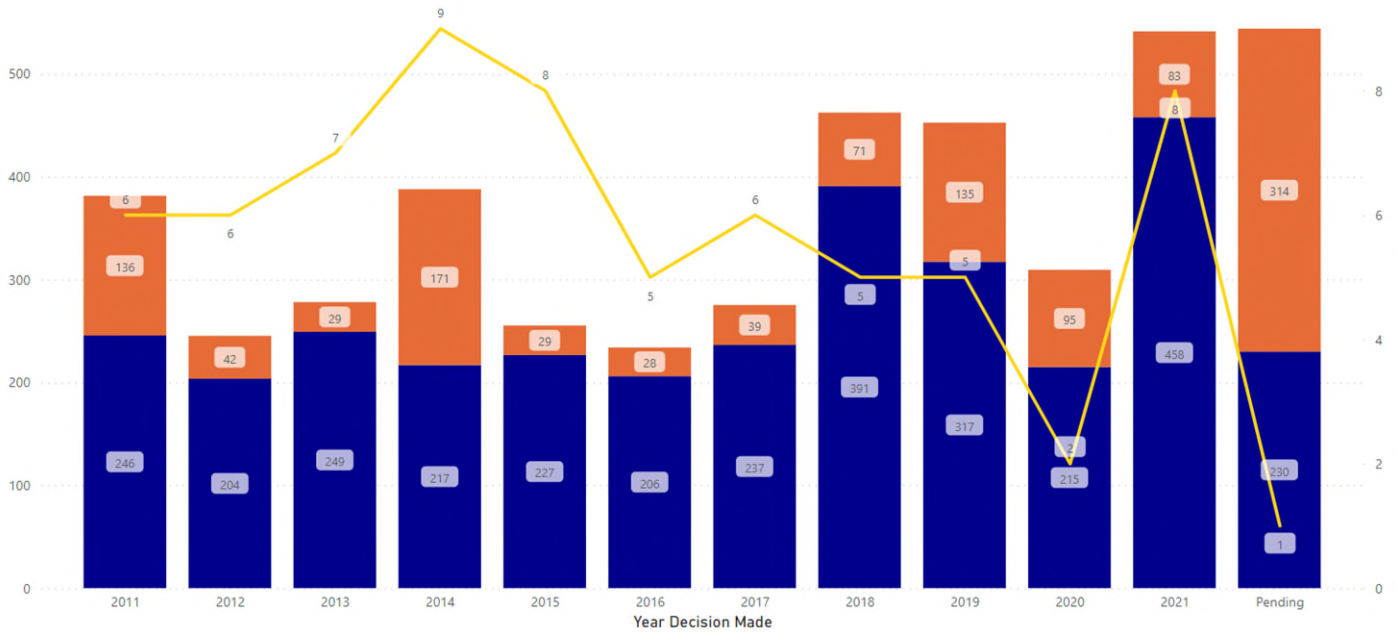
### How many Modifications raised and Workgroups held?

● Mods raised ● Workgroups (excl. Issues)



Mean calendar days to send to Ofgem, Mean calendar days for Ofgem to make decision and Count of Mods decided by Year Decision Made

● Mean calendar days to send to Ofgem ● Mean calendar days for Ofgem to make decision ● Count of Mods decided



\* excludes Self-Governance, Fast-Track Self Governance, straight to Report Phase and Urgent Modifications

## VIII: Recommendations

We invite the Panel to:

- a) **APPROVE** a four month extension for P441; and
- b) **NOTE** the contents of the June 2023 Change Report.

**For more information, please contact:**

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# Appendix A

## Key

Stage	Modifications	Change Proposals
<b>Initial Written Assessment</b>	Includes Elexon's Initial Written Assessment of the implications of each Modification Proposal and a recommendation of how the Modification should proceed.	Includes Elexon's Initial Written Assessment of the implications of each Change Proposal to seek Committee(s) initial views and agree the consultation questions.
<b>Assessment Procedure</b>	Workgroups are held to develop and assess the proposal. The Workgroup recommendations are consulted on (Assessment Procedure Consultation), before being submitted to Panel with the Workgroup's recommendations on how to proceed (Assessment Report). The Panel initial views are gathered.	The proposal is consulted on in a Change Proposal Consultation Batch. The relevant Committee(s) then decide(s) whether to approve or reject the Change Proposal.
<b>Report Phase</b>	The Panel's initial views on whether to approve and timescales for implementation are consulted on (Report phase Consultation). The responses to the consultation are then presented to the Panel for their final views (Draft Modification Report). The Panel decide whether to approve or reject the Modification and publish the Final Modification Report. If the Modification cannot be approved under Self-governance, the Final Modification Report is sent to Ofgem for decision.	Not applicable.
<b>Awaiting Decision</b>	Modifications that have been submitted to Ofgem for decision or Modifications that have been decided on by the Panel under Self-Governance arrangements and are still subject to objection by BSC Parties (15 Working days after the Panel's decision).	Not applicable.
<b>Awaiting Implementation</b>	Modifications that have been approved but not yet implemented and details of Modifications that have been rejected or withdrawn.	Change Proposals that have been approved but not yet implemented and Change Proposals that have been rejected.
<b>Rejected / Withdrawn</b>	Modifications that have been rejected by the BSC Panel/ the Authority or withdrawn by the Proposer or the Pane	Change Proposals that have been rejected by the Panel or the relevant Panel sub-Committee.