

ELEXION

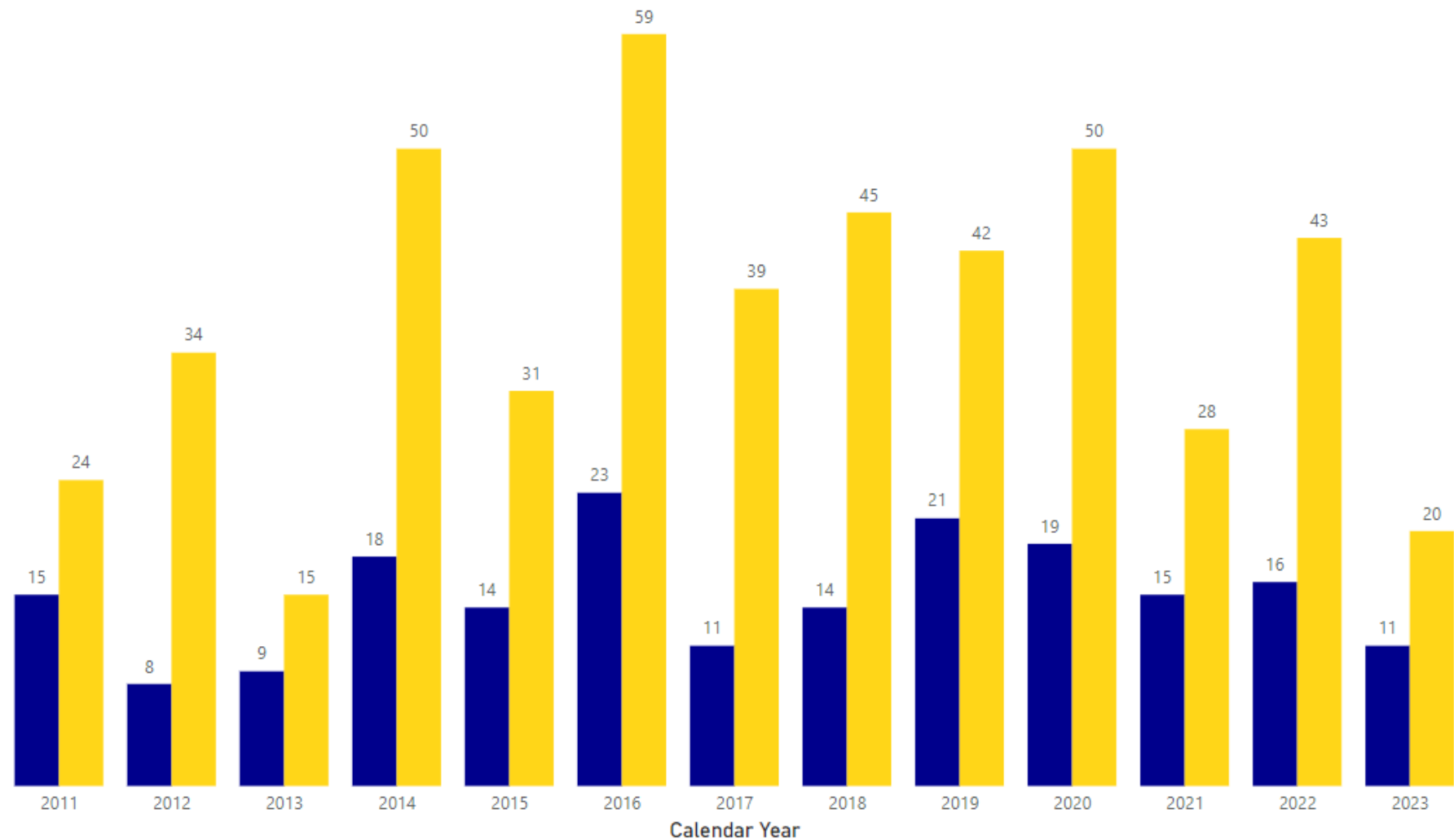
**Change Report and Progress of
Modification Proposals**

343/02 – Ivar Macsween

BSC Modifications raised by year and Workgroups held

How many Modifications raised and Workgroups held?

● Mods raised ● Workgroups (excl. Issues)



BSC Modifications overview

Initial Written Assessment	P461
Assessment Procedure	P412, P441, P442, P444 (Sent Back), P451, P454, P455, P459
Report Phase	P456
Urgent	-
With Authority (decision cut-off)	P432 (+3 months after Ofgem decision), P443 (+3 months after Ofgem decision), P457 (+5WDs), P460 (+5WDs)
Authority Determined (implementation date)	-
Self-Gov. Determined	-
Fast Track Determined	-
Withdrawn	-
Open Issues	Issue 101, Issue 103, Issue 106, Issue 109

BSC Modifications approved timelines

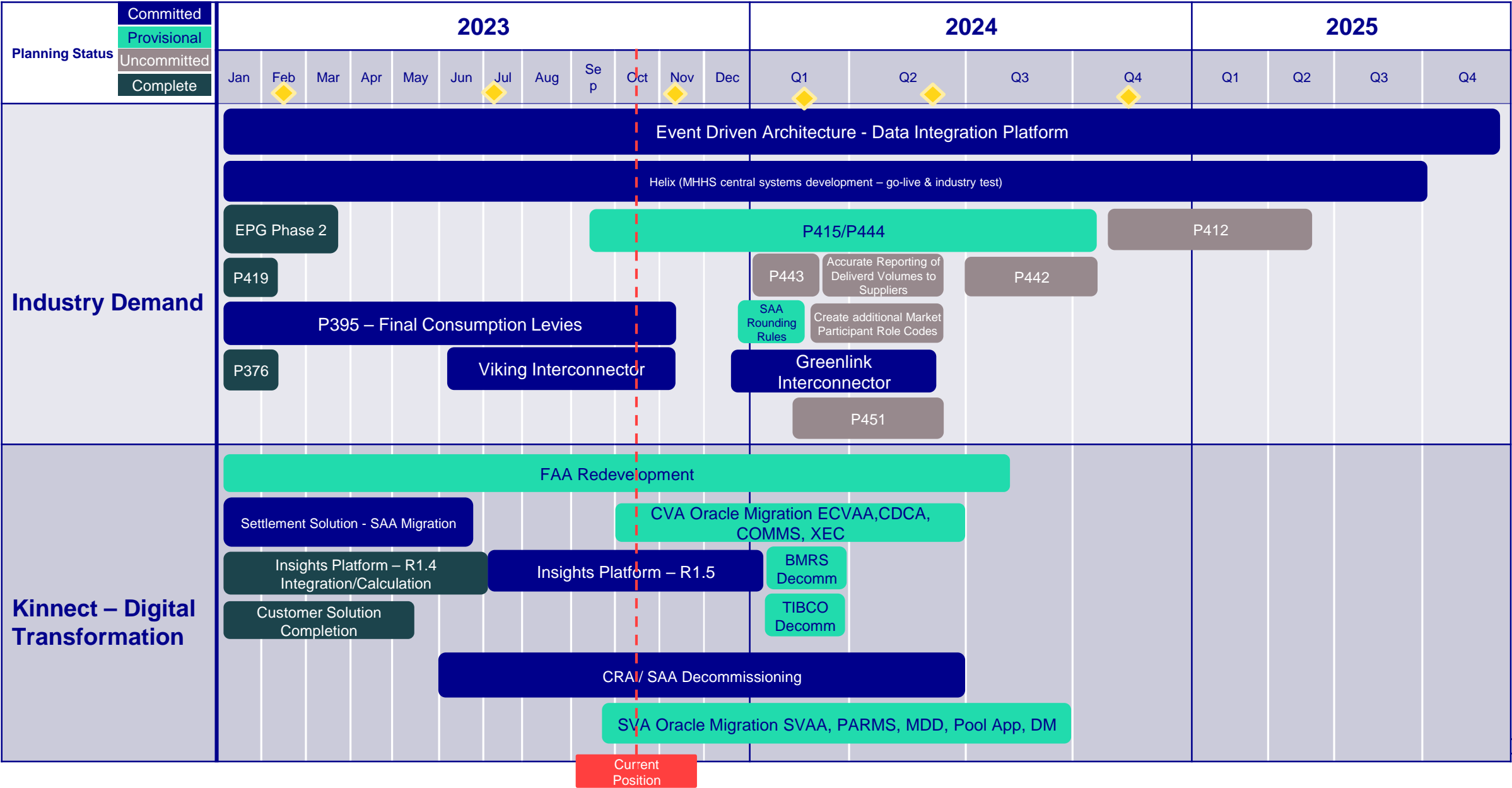
	Ext. Reqs.	Aug 23	Sep 23	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24
P412 'Non-BM Balancing Providers pay for non-delivery imbalance'	4				AR		DMR						
P441 'Creation of complex site classes'	2				AR	DMR							
P442 'Reporting FCL for exempt and licenced supply'	1				AR		DMR						
P451 'System Restoration'	1					AR		DMR					
P454 'Removal of obligation to provide TIBCO service'	1					AR	DMR						
P455 'On-site aggregation method'	0						AR	DMR					
P456 'Enable Elexon to procure ancillary Technology Services for use by BSC Agents'	0			DMR									
P457 'Replace the EAA with LCIA'	0		DMR										
P459 'Allow different Supplier Agents for Import and Export MSIDs'	0	IWA								AR	DMR		
P460 'Amend responsibility for MHHS Migration Plan'	0	IWA	DMR										

BSC Change Release Roadmap

2023	2023	2024			Un-allocated
Ad-hoc	Nov	Feb	Jun	Nov	
P432 'HH Settlement for CT Adv. Meters' (+3 months after the Authority's approval)	P395 'Final consumption levies'	CP1578 'Enabling Embedded LDSOs to submit Site Specific LLFs'	P451 'System Restoration'	P415 'VLP access to wholesale market' (Q4 2024)	P412 'Non-BM BS providers pay non-delivery'
P443 'Cap NGESO Interconnector Trades' (+3 months)	P453 'Metering Dispensation improvements'	CP1584 'Allow non-BSC Parties to raise CPs'	P455 'On-site aggregation method'	P444 'Compensation for VLP actions in the BM' (Q4 2024)	P441 'Creation of complex site classes'
P454 'TIBCO retirement' (+5WDs)	CP1574 'Improving the use of the D0215'	CP1585 'Submission of Half Hourly data for Embedded LDSO sites to Host LDSO'			P442 'Reporting FCL for exempt and licenced supply'
P456 'Enable Elexon to procure ancillary Technology Services for use by BSC Agents' (+5WDs)	CP1575 'Permitting the use of busbar VTs within metering Codes of Practice 1 and 2'				MHHS
P457 'Replace the EAA with LCIA' (+5WDs)	CP1576 'New Interconnector Fuel Type Category: Viking Link'				P459 'Allow different Supplier Agents for Import and Export MSIDs'
P458 'Update data protection rules for MHHS testing' (+5WDs)	CP1577 'Clarify use of D0151'				
P460 'Amend responsibility for MHHS Migration Plan' (+5WDs)	CP1579 'Allowing HHDCs to undergo Protocol Approval before completing Qualification'				<div><div>Key</div><div>Approved</div><div>With Authority</div><div>Report Phase</div><div>Assessment Phase</div><div>Direction</div><div>Urgent</div></div>
	CP1581 'Recommendation to update BSCP18 following Issue 105'				
	CP1582 'Remove MA from BSCP520 3.6.2.3'				
	CP1583 'Rationalising publication of ETR data on Elexon Systems'				

Portfolio Pipeline and Plan (Systems impacting change excludes Doc only)

Denotes Industry release



‘Ensuring non-BM Balancing Services providers pay for non-delivery imbalances at a price that reflects the real-time value of energy’

- NGESO are finalising their impact assessment and recommendation report for the P412 solution options
 1. P354 with Mandatory Data Sharing
 2. P354 with Optional Data Sharing
 3. NGESO Pass-through
 4. New Party role
 5. Non-BM Balancing Services Providers move to the BM
- Elexon are still awaiting the impact assessment and recommendation report to clarify the scope of future work. This could range from requiring further Workgroup meetings, consultation and impact assessment, or a recommendation of no change, (NGESO could potentially withdraw the Modification in this case)
- Until this is received, the next steps are currently unclear and therefore we are seeking an additional 9 month extension to cover all eventualities in the case that further work is required

‘Creation of Complex Site Classes’

- Elexon held the 8th Workgroup on 20th September 2023. Ofgem attended the Workgroup and advised they would require further analysis on the current P441 solution to help them make a decision. As a result of this the Proposer will work alongside Elexon and NGESO to gather requirements
- The decision was made to put on hold the Assessment Procedure Consultation until the analysis had been completed, and as a result Elexon will be requesting an extension to the Modification from the BSC Panel. We have informed both DCUSA and REC due to the impact on their consequential changes and will reconvene with all impacted codes when a new progression timetable has been agreed
- Due to the need conduct further analysis, we ask the Panel to approve a 6 month extension to the P441 Assessment period to allow for these activities to take place, followed by cross code consultation and gathering of any final Workgroup views

‘Reporting chargeable volumes for exempt and licensed supply’

- The P442 Assessment Procedure Consultation was issued on 2 October 2023 will close on 20 October 2023
- The Workgroup will meet to discuss the consultation responses and carry out final voting on 25 October 2023
- We are aiming to present the Assessment Report to the BSC Panel on 12 November 2023 but note that there is a risk as this timing is subject to the complexity of responses received in the Assessment Consultation and the efficient closing of discussions at the final Workgroup meeting
- We therefore request a two month extension to the Assessment Procedure to provide contingency

Modification update: P444

- **‘Compensation for Virtual Lead Party actions in the Balancing Mechanism’**
- P444 was sent back to the BSC Panel on 8 September 2023, as Ofgem felt they were unable to form an opinion on whether or not P444 should be approved
- Next Workgroup meeting will take place on 2 November 2023, meeting objectives will be to:
 - Consider the Send Back and seek consensus (and buy in from Ofgem) on the best way to answer it
 - Offer a refresher on the P444 Solution and approval of the P415 ‘Facilitating access to wholesale markets for flexibility dispatched by Virtual Lead Parties’ Proposed Solution
 - Consider options and develop requirements for further analysis for P444
- Elexon have been seeking additional input from VLPs and Suppliers active in the BM who are not already a part of the P444 Workgroup
- We can update the Panel on the meeting outcomes at the November meeting

Issue 106 Update: 'Review of BSC Credit Cover Arrangements'

The issue: Credit Cover has not been sufficient to cover outstanding Trading Charges leading to debt mutualisation of £71m+. Further, concern was raised around parts of the Credit calculation, in particular around the Credit Assessment Price (CAP) processes.

So far, the Issue group has:

- Conducted a survey across industry to gather feedback on the Credit processes
- Analysed delaying rejection/refusal of energy contract notifications when a Party in Credit Default
- Suggested a New Credit Calculation which uses available meter read data from D+1
- Suggested changes such that Parties posing a greater risk to the market should post greater levels of Credit collateral
- Assessed whether a mechanised process could replace the CAP process as run by the Credit Committee
 - Whilst the survey and initial issue group feedback suggested the CAP should be amended, the Issue group reflected on the mechanised option presented and preferred the current processes
- Considered other operational level changes to the Credit processes such as shortening the time taken to withdraw Credit

The next steps for Issue 106 are:

- Hold further meetings to:
 - Recap on the initial feedback and confirm what changes should be progressed through Modifications (recommending at least three):
 - Confirm the Panel/Elexon to Ofgem hand-off where there has been a recommendation to expel a Party, in scenarios where there is a license and customers (reflecting on the 2021/2022 expulsion challenges)

We welcome thoughts from the Panel on anything that has not yet been covered, subject to being within scope of the defined issue

Upcoming Modification Proposals

- We are supporting Proposers on the following upcoming Modification Proposals:
 - Outcome from Issue 107: Review of Section N 'Clearing, Invoicing & Payment' → targeting November Panel
 - Outcome from Issue 102: Allow more than one Alternative for BSC Modifications → November Panel
 - Introducing Standard Changes into the BSC → November Panel

Recommendations

We invite the Panel to:

- a) **APPROVE** a nine month extension to the P412 Assessment Procedure;
- b) **APPROVE** a six month extension to the P441 Assessment Procedure;
- c) **APPROVE** a two month extension to the P442 Assessment Procedure; and
- d) **NOTE** the contents of the October Change Report.

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**343/04 - P451 'Updating BSC Black Start
Provisions and Compensation
Arrangements' Assessment Report**

Patrick Matthewson

12 October 2023

P451: Background

- **Issue:**
- NGESO is progressing [GC0156 'Facilitating the implementation of the Electricity System Restoration Standard'](#) to:
 - Update all references to “Black Start” to “System Restoration” in the Grid Code
 - Allow Distributed Energy Resources (DERs) to be to be used as Restoration Service Providers. These can be BSC or non-BSC Parties
- Currently, non-BSC Parties cannot claim BSC Black Start compensation
 - GC0156 Market and Funding Mechanisms sub group recommended P451 be raised to address this

P451: Proposed solution

- **Proposed solution:**
 - Amend BSC [Section G 'Contingencies'](#) to allow non-BSC parties who have a contract with NGESO to provide System Restoration services to claim BSC Black Start compensation
 - Update references to “Black Start” to “System Restoration”
 - Update cross references to relevant parts of the Grid Code that have been renumbered by GC0156

Impacts & costs

Implementation:

Organisation	Item	Implementation costs (£)
Elexon	Systems	N/A
	Documents	<£2k
	Other	N/A
NGESO	Systems	N/A
	Other	N/A
Industry	Systems & processes	N/A

On-going:

Organisation	On-going costs (£)
Elexon	Approx £1K
NGESO	N/A
Industry	Low

- The Workgroup agreed that this would be a **document only** change:
 - BSC Section G: Contingencies
 - BSC Section T: Settlement and Trading Charges
 - BSC Section X-1: General Glossary
 - BSCP18: Corrections to Bid-Offer Acceptance Related Data
 - BSCP201: Black Start and Fuel Security Contingency Provisions and Claims Processes
 - Central Registration Agent User Requirements Specification
 - BSC Service Description for Energy Contract Volume Aggregation
- **EBGL Article 18 Terms and Conditions**
 - The changes proposed to BSC Section G3 and T1.7 amend BSC provisions identified as constituting European Balancing Guideline (EBGL) Article 18 Terms and Conditions, as listed in BSC Section F, Annex F-2. This means that the Report Phase Consultation is required to be of one calendar month's duration
 - The Workgroup view is that this impact is **neutral**

P451: Consumer and environment impacts

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

P451: Implementation approach

- **5 Working Days following Authority decision** in order to ensure that P451 (if approved) is implemented prior to the ESRS contracts going live in July 2025

P451: Workgroup views (1 of 2)

- **The Workgroup met four times with discussion focused across a range of specific and standard ToR with focus on the compensation mechanism and legal changes.**
- Compensation recipients
 - The Workgroup agreed that non-BSC Parties who are System Restoration Contractors should be eligible to claim for BSC compensation
 - The Workgroup agreed that the receipt of instructions as part of a Distribution Zone Restoration Plan under GC0156 would trigger eligibility and would be sufficient to limit compensation to the intended non-BSC Party
- Compensation process
 - The Workgroup agreed that Lead Parties would submit the claim on behalf of non-BSC Parties within 20 Business Days of a System Restoration event
 - The Workgroup agreed that the process for payment of claims from Elexon would remain the same as outlined in Section G3.6.6(a)
 - The Workgroup agreed that the claims committee responsibilities would be extended to include non-BSC Parties

P451: Workgroup views (2 of 2)

Cost recovery mechanism

- The Workgroup **consulted on 3 variants to the P451 Solution**: the original proposal, a variant with gross demand (including final demand) and a variant with gross demand (including non-final demand) to help them come to an informed decision
- Elxon legal counsel was requested to **confirm that the change would be in scope** according to the original Modification Proposal form
- Elxon legal counsel and the Workgroup concluded that this was **not in scope** of the defect as described in the original Modification Proposal form

P451: Assessment consultation responses (1 of 3)

- The P451 Assessment consultation ran from 4 September 2023 until 28 September 2023 receiving 1 response from the Proposer

Question	Yes	No	Neutral	Other
Do you agree with the Workgroup’s initial unanimous view that P451 does better facilitate the Applicable BSC Objectives than the current baseline?	1	0	0	0
Do you agree with the Workgroup that the draft legal text in Attachment B delivers the intention of P451?	1	0	0	0
Do you agree with the Workgroup that the draft amendments to the Code Subsidiary Documents in Attachment C delivers the intention of P451?	1	0	0	0
Do you agree with the Workgroup’s recommended Implementation Date?	1	0	0	0
Do you have a preference for implementation of P451 in the Standard BSC June 2024 release, or 5 Working Days after Authority decision?	5 Working Days after Authority decision			
Do you believe that cost recovery should be based on net or gross demand?	The respondent argued that the original proposal unless amended by the proposer, would continue by default with the net demand recovery basis of existing BSC Section G claims by relevant BSC Parties under baseline however could change opinion based on appetite and evidence.			

P451: Assessment consultation responses (2 of 3)

Question	Yes	No	Neutral	Other
Do you believe that cost recovery under P451 should be based on final demand?	0	1	0	0
Do you agree that under P451 the Lead Party will submit the claim on behalf of the non-BSC Restoration Contractor?	1	0	0	0
Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P451 which would better facilitate the Applicable BSC Objectives?	1	0	0	0
Do you agree with the Workgroup's assessment of the impact on the BSC Settlement Risks?	1	0	0	0
Do you agree with the Workgroup's assessment that P451 does impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?	1	0	0	0

P451: Assessment consultation responses (3 of 3)

Question	Yes	No	Neutral	Other
Will P451 impact your organisation?	1	0	0	0
How much will it cost your organisation to implement P451?	The respondent noted that aside from initial investment and resource from implementation (estimated £20k) the operational burden will fall to Elexon			
What will the ongoing cost of P451 be to your organisation?	The respondent felt that there would not be ongoing work other than de-minimis time in explaining to tenderers and other enquiries			

- The P451 Workgroup noted the low response rate to the consultation (with only 1 response received from the Proposer). The Workgroup discussed why this may have been the case noting that non-BSC parties, who would likely be beneficiaries, may not have the resource or understanding of Elexon to respond to this consultation. Additional engagement is planned to address this

P451: Workgroup views against BSC Objectives

Does the P451 Proposed Solution better facilitate the Applicable BSC Objectives?			
Applicable BSC Objective	(a)	(c)	(d)
Proposer Views	Positive	Positive	Positive
Final Workgroup Views	Positive (Unanimous)	Positive (Unanimous)	Positive (Unanimous)

- **Objective (a)** - The Workgroup believes that P451 will facilitate the implementation of NGESO’s new approach to System Restoration set out in GC0156. This new approach will enable NGESO to meet their new Transmission Licence obligation to satisfy the ESRS that comes into full effect on 31 December 2026
- **Objective (c)** – The Workgroup believes that the new System Restoration/Distributed ReStart approach that P451 facilitates will enable a wider range of potential Restoration Contractors to tender for System Restoration Services
- **Objective (d)** - The Workgroup believes that P451 promotes efficiency in the implementation of balancing and settlement arrangements because without it, the BSC’s System Restoration processes and terminology will become outdated and misaligned with other industry codes such as the Grid Code and CUSC

P451: Recommendations

We invite the Panel to:

- a) **AGREE** that P451 Proposed Modification:
 - i. **DOES** better facilitate Applicable BSC Objective (a);
 - ii. **DOES** better facilitate Applicable BSC Objective (c); and
 - iii. **DOES** better facilitate Applicable BSC Objective (d);
- b) **AGREE** an initial view that P451 **SHOULD NOT** be treated as a Self-Governance Modification;
- c) **AGREE** that P451 **DOES** impact the EBGL Article 18 terms and conditions held within the BSC;
- d) **AGREE** that the impact on the EBGL objectives is **neutral**;
- h) **AGREE** an initial recommendation to the Authority that the P451 Proposed Modification should be **approved**;
- i) **AGREE** an initial Implementation Date of:
 - i. **5 WORKING DAYS** after Authority approval ;
- j) **AGREE** the draft Legal Text;
- k) **APPROVE** the draft amendments to the Code Subsidiary Documents
- l) **AGREE** that P451 is submitted to the Report Phase; and
- m) **NOTE** that Elexon will issue the P451 Draft Modification Report (including the draft Legal Text) for a one month consultation and will present the results to the Panel at its meeting on 14 December 2023.

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**P456 'Enable Elexon to procure ancillary
Technology Services for use by BSC
Agents' - Modification Report**

343/05 – Jacob Snowden (Elexon)

12 October 2023

P456: Background and proposed solution

Issue

- Elexon will roll out the cloud-based platform Kinect within the next 15 months. This is to ensure Elexon can support the changing needs of its customers and replace ageing systems which are increasingly unsuitable
- Requiring a BSC Agent to procure cloud-based services on its behalf, may be significantly more expensive than Elexon procuring these services itself
- Therefore, Elexon requires flexibility to enter contacts with these types of arrangements and relieve relevant BSC Agents appropriate responsibility for the ancillary Technology Services (but not the ancillary Technology Services Providers themselves)

Proposed solution

- Modify Section E 'Role of BSC Agents' to enable Elexon, rather than BSC Agents to procure ancillary Technology Services
 - Adding in new definitions and making clear that Technology Service Providers would not be BSC Agents

P456: Impacts and costs

- P456 is a Document-only change, with no BSC system impacts identified
 - Change to BSC Section E 'BSC Agents'
 - Cost of <£1k to implement
- No on-going costs for Elexon have been identified, but the solution could avoid incurring certain costs and impact future negotiations and BSC Agent contracts
- No implementation or on-going costs or impacts on industry have been identified
- There are potential costs savings for all BSC Parties if P456 is implemented
- There are **no** EBGL impacts or impacts on EBGL objectives

P456: Report Phase consultation responses

Question	Yes	No	Neutral	Other
Question 1: Do you agree with the Panel’s initial unanimous recommendation that P456 should be approved?	1	0	0	0
Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P456?	1	0	0	0
Question 3: Do you agree with the Panel’s recommended Implementation Date?	1	0	0	0
Question 4: Do you agree with the Panel’s initial view that P456 should be treated as a Self-Governance Modification?	1	0	0	0
Question 5: Do you agree with the Panel’s initial recommendation that P456 does not impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?	1	0	0	0
Question 6: Do you agree with the identified consumer benefits for P456?	1	0	0	0
Question 7: Will P456 impact your organisation?	0	1	0	0

- We received one response representing a Distributor:
 - They confirmed that there would be no implementation or ongoing costs for P456 for their organisation

P456: Recommendations

We invite the Panel to:

- a) **AGREE** that P456 **DOES** better facilitate Applicable BSC Objective (d);
- b) **AGREE** that P456 **DOES NOT** impact the EBGL Article 18 terms and conditions held within the BSC;
- c) **DETERMINE** (in the absence of any Authority direction) P456 is a Self-Governance Modification Proposal;
- d) **APPROVE** P456;
- e) **APPROVE** the Implementation Date for P456 of **20 Working Days** after the Panel decision as a Special BSC Release;
- f) **APPROVE** the draft Legal Text for P456; and
- g) **APPROVE** the P456 Modification Report.

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**Approval of creation of new 'On-Site
Energy Allocation Methodology Document'
the November 2023 BSC Release**

343/06 – Ivar Macsween (Elxon)

12 October 2023

Approval of Configurable Item changes for the November 2023 BSC Release

- The BSC Panel are invited to approve the new Category 3 document 'On-Site Energy Allocation Methodology Document'.
- This document has been drafted to give effect to the implementation of P395 'Aligning BSC Reporting with EMR Regulations – an enduring solution'
 - Approved by Ofgem on 6 October 2022 for Implementation as part of the November 2023 Standard BSC Release.
- To ensure appropriate governance and visibility of any changes to how Supplier Volume Allocation Agent (SVAA) calculates non-chargeable demand under P395, Elexon have created the 'On-Site Energy Allocation Methodology Document'
 - New Category 3 BSC Configurable Item which will specify how the SVAA should calculate non-chargeable demand using the metered volumes for the Boundary Point Metering System Identifiers (MSIDs) and Asset Metering System Identifiers (AMSIDs) submitted by Suppliers in Electricity Market Reform (EMR) AMSID Declarations.
 - Category 3 Configurable Items are not amended by Modifications or Change Proposals. Elexon invites the BSC Panel to assume ownership so that any changes can be consulted with industry before approval requested from the BSC Panel in accordance with the governance process set out in the document.
- We received no responses relating to the documents from the industry review, we are now presenting the 'On-Site Energy Allocation Methodology Document' to the BSC Panel for approval.

Recommendations

We invite the Panel to:

- a) **APPROVE** new BSC Configurable Item 'On-Site Energy Allocation Methodology Document' to become effective as version 1.0 on 2 November 2023 as part of the November 2023 BSC Release;
- b) **AGREE** that the 'On-Site Energy Allocation Methodology Document' should be a Category 3 BSC Configurable Item; and
- c) **AGREE** that the BSC Panel will have ownership of the 'On-Site Energy Allocation Methodology Document'.

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**343/07 Update to P427 Peer Comparison
Data**

Simon Waltho

12 October 2023

Background

- Under P427 Elexon currently publishes Suppliers' performance in relation to Active Import (AI) Energy
- Performance for Active Export (AE) Energy not previously monitored due to historically low volumes; these have now increased to the point at which poor Settlement performance can impact the wider industry
- NHH Export Performance is extremely poor (18.67% at RF for Settlement Month June 2022)
- No volume standard in HH Export due to requirement to estimate to 0; however, estimation to 0 where generation is taking place necessarily introduces error into Settlement
 - ~10% of MC C and ~33% of MC E, F & G Export MSIDs estimating at R1 on Settlement Day 5 July 2023
 - Compares to ~11% of MC C and ~9% of MC E & G Import MSIDs – both of which equate to Settlement performance below the compliant standard
- Making this data Public is consistent with the general principles of P427:
 - to provide a further incentive for Parties to improve their performance; and
 - to allow individual Suppliers to be held accountable for any serious Settlement Errors resulting from their underperformance
- **PAB272** unanimously agreed to recommend that Panel Approve the publication of Export performance data

Recommendations

We invite the Panel to:

- a) **APPROVE** the routine publication of Export Settlement Performance data via the Peer Comparison technique under Modification P427.

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**P461 'Accurate Reporting of Customers
Delivered Volumes to Suppliers'**
- Initial Written Assessment

343/03 – Serena Tilbury (Lead Analyst) &
Graham Wilcox (Endco)

12 October 2023



Issue: The P287 flow does not contain **all** data pertaining to VLP actions

Cause: The P287 flow was introduced to advise the supplier of VLP actions taken so that supplier could determine how their SAAi014 report had been adjusted in respect of MPANs registered to them

However, whilst the P287 does contain VLP *reported* actions it does **not** contain the Elexon adjustments which are made in response to knowing what the *actual* VLP actions were (*after the fact*)

e.g. Adjusted SAAi014 + P287 \neq Unadjusted SAAi014



Impact: Since the introduction of VLP BM actions within the market, EnDCo has not been able to accurately charge its customers imbalance

EnDCo's business model is to pass through all market charges and benefits to the customer at 100%

To calculate customer imbalance, EnDCo proportionalise BMU level imbalance provided by the SAAi014 across MPANs within that BMU.

Where VLP actions are reported via the P287, EnDCo adjusts the proportionalisation accordingly. If we did not then all other MPANs within the BMU would subsidise any VLP actions.

Where the Elexon adjustments to the VLP Actions are missing from the P287 data, those adjustments are subsidised by the non VLP MPANs



Solution: Inclusion of Elexon VLP Action adjustments in the P287

Effect: $\text{Adjusted SAAi014} + \text{P287} = \text{Unadjusted SAAi014}$

With all the VLP Action data, EnDCo can correctly proportionalise the BMU Imbalance across all MPANs within a BMU

P287 structure is not being altered

Only additional adjustment data is being added



Views against objectives :

The proposal meets BSC Objective (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:

This change is expected to positively impact competition in the sale and purchase of electricity, by providing Suppliers with more accurate information on the actions taken by their customers through VLPs and allowing them to charge those customers in a way that is cost-reflective and consistent with agreed contractual terms.

P461: Issue and Proposed solution

Issue

- The details reported to Suppliers (where customer consent is given) when a customer delivers a Bid Offer Acceptance (BOA) through a Virtual Lead Party (VLP) do not reflect any adjustments made to that data in Settlement

Proposed solution

- Values reported to Suppliers on the P0287 'Secondary Half Hourly Delivered Volumes' data flow should incorporate any adjustments made by the Settlement Administration Agent (SAA)

P461: Impacts & Costs

- Updates to Settlement Administration Agent (SAA) and Data and Calculations Platform (DCP) systems
- Document changes to BSC Section S Annex S-2, Section T, Section X-2
- Impact on EBGL Article 18 balancing terms and conditions due to updates to Section T4:
 - We do not believe this proposal has a direct or material impact on the EBGL provisions and is therefore neutral against the EBGL objectives
 - A calculation is being added into SAA to obtain an adjustment ratio as the most efficient place for this to be done. This will be sent to DCP and not used in settlement.

Organisation	Implementation (£)	On-going (£)	Impacts
Elexon	170k – 260k	0	Cost to update DCP & SAA systems
NGESO	0	0	
Industry	0	0	Delay in receiving data may cause billing delays for some Suppliers which could incur some costs. This will be clarified during the Report Phase Consultation
Total	170k – 260k	0	

- **Potential impact on Industry: “Delay in receiving data may cause billing delays for some Suppliers which could incur some costs. This will be clarified during the Report Phase Consultation”**
- This delay will be 2 days, to allow for SAA to do its calculations and then send it back to SVAA to adjust the volume to be reported
- The proposer understands and accepts that a delay in the P0287 is necessary to ensure accurate billing for customers by incorporating the balance adjustments
- Our assumption is that suppliers will not be affected by this delayed billing run. Those who may be affected (not known, but believed to be maximum of <5) would be those who require the MPAN level data contained within the P0287. Any suppliers using MPAN data should welcome the change, as it provides them with data that has been missing since the inception of P0287
- We propose including a question to address this in the Report Phase Consultation. E.g. “If you are a Supplier that uses MPAN data, do you expect the 2-day delay to receiving this data to impact you?”. We will also invite them to provide information such as costings, to assess the scale of impact

P461: Proposed Progression

- Straight to Report Phase
- One calendar month consultation period due to the impact on the EBGL Article 18 terms and conditions held within the BSC:
 - Updates required to Section T4
 - Not a candidate for Self-Governance due to EBGL impacts

Event	Date
Present Initial Written Assessment to Panel	12 October 2023
Report Phase Consultation (1 month EBGL consultation)	19 October 2023 – 20 November 2023
Present Draft Modification Report to Panel	14 December 2023
Issue Final Modification Report to Authority	20 December 2023

Implementation

- Suggested Implementation Dates:
- **7 November 2024** if an Authority decision is received on or before 7 May 2024; or
- **27 February 2025** if an Authority decision is received after 7 May 2024 but on or before 27 August 2024

P461: Recommendations

We invite the Panel to:

- a) **AGREE** that P461 progresses directly to the Report Phase;
- b) **AGREE** that P461:
 - i. **DOES** better facilitate Applicable BSC Objective (c);
- c) **AGREE** an initial view that P461 **should not** be treated as a Self-Governance Modification;
- d) **AGREE** that P461 **DOES** impact the EBGL Article 18 terms and conditions held within the BSC;
- e) **AGREE** the impact on the EBGL objectives;
- f) **AGREE** an initial recommendation to the Authority that P461 should be **approved**;
- g) **AGREE** an initial Implementation Date of:
 - i. **7 November 2024** if an Authority decision is received on or before 7 May 2024; or
 - ii. **27 February 2025** if an Authority decision is received after 7 May 2024 but on or before 27 August 2024;
- h) **AGREE** the draft Legal Text; and
- i) **NOTE** that Elexon will issue the P461 Draft Modification Report (including the draft Legal Text) for a one month consultation and will present the results to the Panel at its meeting on 14 December 2023.