

## 304/03 BSC Change Report: July 2020

### Summary of Open Changes

#### Total open changes:

- Modifications – 15
- Change Proposals – 3
- Issues – 7

Please note that BSC Changes, as agreed by the BSC Panel, are being prioritised while the industry manages the impact of COVID-19. Details of the impacts of this agreed approach are summarised in section I and detailed in sections II and III. You can also find details on our webpage here: <https://www.elexon.co.uk/about/about-elexon/coronavirus-covid-19-latest-information/covid-19-impact-on-bsc-changes/>

#### Modifications and Change Proposals

##### Initial Written Assessment:

- None

##### Assessment Procedure

- Next Workgroups: P332 – mid July, P376 – July, P379 – TBC, P395 – TBC, P399- 17 July, Issue 86 – 6 March, Issue 69- 31 March, Issue 88 27 July, Issue 89 29 June, P402- end July , P407 – 7 July, Issue 90 - 13 July
- Assessment Consultations: P375 – Aug, P376 – Jul, P408 - Jul
- Assessment reports: CP1527, CP1529
- CPC batch: none

##### Report Phase

- RPC:
- DMR: P397, P408, P409

##### Awaiting decision

- Authority: P390
- Self-Governance: none

##### Awaiting implementation

- P396 – 5 Nov 20, CP1528 – 5 Nov 20, P383 – 1 Apr 21

#### Change

Process governing the code, subsidiary documents and systems.

#### BSC & Codes

The procedures that govern the electricity industry.

#### Risks

The techniques that confirm compliance or identify issues.

#### Committees

The groups that oversee changes and processes.

#### Market entry

Procedures for joining and leaving the market.



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## Key

Stage	Modifications	Change Proposals
Initial Written Assessment	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.
Assessment Procedure	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.
Report Phase	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.
Awaiting Decision	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.
Awaiting Implementation	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.
Rejected / Withdrawn	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.



## COVID-19: Managing changes to the Balancing and Settlement Code

At its monthly meeting on 9 April, the Balancing and Settlement Code (BSC) Panel agreed a set of principles for ELEXON to work to, when progressing changes to the code while the industry manages the impact of COVID-19. The Panel reviewed this approach on 11 June 2020, made no changes and agreed to review again on 13 August 2020.

Changes to the BSC (and its subsidiary documents) will continue to be progressed, but will be prioritised based on whether the change:

- Is required to mitigate risks and issues caused by COVID-19
- Is required to be implemented by a fixed deadline, and
- Has minimal impact on market participants, unless required for the previous two points.

The Panel recognises and agreed to these steps because the COVID-19 situation is challenging and unprecedented for market participants, and that it has resulted in significant operational challenges and changes to the way that they run their business.

### Modification and Issue Workgroups

Workgroups will continue, unless (or until) Members report that they cannot attend meetings.

Since the Government's lockdown was introduced, Workgroups have continued as planned, with no impacts or issues reported by the Members. ELEXON remains able and willing to support the progression of change.

### Change consultations

Some will be issued in line with the three principles above, but most will be staggered to reduce on the burden on market participants.

The Panel agreed in principle (and subject to the points above) to delay consultations where the change is likely to have significant impacts on market participants. Details of these impacts can be found in this report below.

### New changes

The Panel agreed that any changes raised from 9 April should be progressed in line with the agreed principles.

The Panel and ELEXON will monitor the situation and keep this approach under review. They also welcome any feedback you may have on this approach. Please send any comments or questions to [bsc.change@elexon.co.uk](mailto:bsc.change@elexon.co.uk).



## COVID-19: Prioritisation

Mod	Needed to tackle COVID-19	Needed to meet fixed timeline	Minimal impact on market participants	Result (▲ prioritised, ▼ de-prioritised)
P332 'Revision to the Supplier Hub'				▼ Stagger
P375 'Behind the Meter'				▼ Stagger
P376 'Baselining methodology'				▼ Stagger
P379 'Multiple Suppliers'				▼ Stagger
P395 'Final Consumption Levies'				▼ Stagger
P398 'Open Data'			X	▲ Continue
P399 'BSAD transparency'			X	▲ Continue
P402 'BSC Data for targeted Charging Review'		X		▲ Continue
P407 'MARI'		X		▲ Continue
P408 'Improved Output Useable Data'		X	X	▲ Continue
P409 'Balancing data for Clean Energy Package'		X	X	▲ Continue



## COVID-19: Impacts on Modification

	Mar 20	Apr 20	May 20	Jun 20	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21
P332								AR	DMR		
P375								AR		DMR	
P376							AR	DMR			
P379							CBA		AR	DMR	
P395								AR	DMR		
P398							AR	DMR			
P399							AR	DMR			
P402	IWA						AR	DMR			
P407			IWA								AR
P408			IWA		DMR						
P409			IWA		DMR						



## Modification Updates – up until decision

<b>P332: Revisions to the Supplier Hub Principle</b>		<b>Update</b>	
<b>Date Raised:</b>	28 January 2016	<b>Proposer:</b>	Smartest Energy
<b>Target Implementation Date:</b>	Post 2020	<b>Current Status:</b>	Assessment Procedure
<b>Latest Update:</b>	<p>The Assessment Consultation has been moved from June 20 to August 20 as a result of the COVID-19 prioritisation, as it has a significant impact on Parties, particularly Suppliers and their Agents. At its June 2020 meeting, the panel approved a three-month extension to the P332 Assessment Procedure. ELEXON will return with the Assessment Report by the October 2020 Panel meeting.</p>		
<b>Next Event:</b>	<p>The draft legal text and a proposed side-letter, which will be part of the Qualification process, has been reviewed by third party lawyers who have confirmed that the drafting is legally sound and robust. We will issue the legal text and side letter to the Workgroup and hold a Workgroup to discuss in mid-July.</p>		
<b>Issue:</b>	<p>The BSC when originally created was designed to support the Supplier hub principle and to this end is silent on the practice of ‘Customer appointed Agents’. The ‘appointment’ of Agents by Customers, outside of the Supplier hub principle, makes managing Agent performance and delivery of obligations within the BSC difficult, resulting in a reduction in a Supplier’s ability to manage performance against industry targets and risking non-delivery of specific obligations.</p>		
<b>Current Solution:</b>	<p>P332 proposes to require all existing and new Meter Operator Agents (MOAs) and Data Collectors (DCs) to sign a side letter to maintain Qualification status. The letter will require MOAs and DCs to agree to treat all appointments the same regardless of contract status, such that they meet all relevant BSC requirements.</p>		
<b>History:</b>	<p>P332 was raised by Smartest Energy Limited on 28 January 2016 and seeks to address issues associated with Customer’s contracting directly with Supplier Agents.</p> <p>The Panel, at its meeting on 14 September 2017, directed (in accordance with F2.6.10) the P332 Workgroup to pause work on the P332 solution – P332 was effectively placed on hold. The Panel believed the Significant Code Review (SCR) on Half Hourly Settlement (HHS) could change the baseline against which P332 was being developed and assessed. Periodic checkpoints were scheduled to check whether P332 should re-start, remain on-hold or be withdrawn.</p> <p>The Panel approved a seven-month extension to the Assessment Procedure at its meeting on 10 May 2018. The rationale for the extension was to allow enough time for the outcome of Ofgem’s policy work to be known and for the Target Operating Models (TOMs), which are being developed as part of the SCR, to be further developed. The Panel approved a nine-month extension to the P332 Assessment</p>		



Procedure at its meeting on 13 December 2018, returning with the Assessment Report to the September 2019 Panel meeting. This was on the basis that the preferred Target Operating Model (TOM) to be taken forward in Ofgem's [Significant Code Review \(SCR\) on Electricity Settlement Reform](#) represents a material change from the current baseline against which P332 would be assessed. Further, Ofgem is also considering two areas of policy which will have an impact on P332: [Consultation on supplier agent functions under market-wide settlement reform](#) and [Future of supply market arrangements – call for evidence \(includes Supplier Hub\)](#). The Proposer is monitoring the development of the SCR and these policy areas to consider whether P332 should be withdrawn or work restarted.

At the September 2019 Panel meeting, the Proposer provided his view that his issue has not yet been addressed in any of the wider Ofgem initiatives and that he is minded to reduce the scope to Meter Operator Agents only.

The Panel sought Ofgem's views as to whether P332 is in line with Ofgem's current strategic direction and whether P332 is or will be within scope of any of Ofgem's programmes of work. Ofgem provided its view on 9 October 2019. Ofgem believe P332 is not and is unlikely to be in scope of any of its programmes of work and P332 could be investigated separately from considerations of a fundamental change to the whole market design, especially considering the proposed narrowed scope of the modification.

On 10 October 2019, the Panel approved a three-month extension to the P332 Assessment Procedure with the understanding a further Workgroup meeting would be held.

The first P332 Workgroup in two years was held on 27 November 2019. The Workgroup agreed that work should continue on P332. Workgroup Members agreed to provide case studies for instances where customer preferred agents have been the cause of, or a significant contributing factor, in issues resulting in BSC underperformance.

The P332 Workgroup provided case studies with the aim of identifying specific areas to gather further evidence on and focus the solution on. The Panel approved a six-month extension, returning with the Assessment Report in July 2020, at its meeting on 16 January 2020

The seventh Workgroup meeting was held on 6 February 2020. The workgroup reviewed case studies provided by members and concluded that the issues identified are common to CPA and non-CPA sites, however, the amount of time and effort needed to resolve these issues for CPA sites is often higher than for non-CPA sites. The Workgroup decided not to conduct any further analysis or evidence gathering at this stage. The Proposer confirmed their preferred solution would be a side-letter as part of the Qualification process, requiring Agents to agree to treat all appointments the same regardless of contract status,



	such that they meet all relevant BSC requirements. This will bring DCs back in to scope and refer directly to CPAs. ELEXON drafted the business requirements and legal text, following the last Workgroup meeting in February 2020.
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<b><u>P375: Settlement of Secondary BM Units using metering behind the site Boundary Point</u></b>		<b>Update</b>	
<b>Date Raised:</b>	10 December 2018	<b>Proposer:</b>	Flexitricity
<b>Target Implementation Date:</b>	24 February 2022	<b>Current Status:</b>	Assessment Procedure
<b>Latest Update:</b>	<p>As per ELEXON’s communication concerning the impact of COVID-19 the timeline for P375 has been pushed back three months, as it has a significant impact on Parties, particularly Virtual Lead Parties and Suppliers. We are using this time to fine check the proposed legal text and finalise the consultation. We are also looking at how we can share draft proposed documents under caveat pending consultation so as to give some indication to industry of proposed technical standards, particularly in relation to a new Code of Practice, CoP 11, for Asset Meters. Almost all work had to stop on P375 during the Cyber-attack, therefore the Consultation and Panel Reports have been delayed to reflect this.</p>		
<b>Next Event:</b>	<p>ELEXON will update and finalise legal text based on Workgroup feedback before meeting on line to agree legal text prior to issuing the Assessment Consultation in August 2020 and returning with the Assessment Report to the October Panel meeting.</p>		
<b>Issue:</b>	<p>The BSC currently only allows metering at the defined Boundary Point to be used for Settlement purposes. However, with the future ability for consumers to participate in the BM and other alternative balancing products, which will be settled under the BSC framework, there is a need to allow Settlement from metering behind the Boundary Point at the asset which is delivering the Balancing Service. This Issue arose through the development of the Project TERRE arrangements through BSC Modification Proposal P344 ‘Project TERRE implementation into GB market arrangements’, but may become relevant to other Balancing Services in the future. The need to allow Settlement from metering behind the Boundary Point is due to the desire to further reduce any potential (either perceived or due to operational reasons) barriers to entry to participate in balancing products.</p>		
<b>Current Solution:</b>	<p>P375 proposes to settle Secondary Balancing Mechanism (BM) Units (to be introduced by P344 ‘Project TERRE’ (Trans European Replacement Reserves Exchange)) using metering equipment behind the defined Boundary Point for Balancing Services (known as ‘behind the Meter’), rather than settling using Metering Equipment at the Boundary Point as per current BSC obligations. This will allow balancing-related services on site to be separated from imbalance-related activities, more accurately reflecting the balancing-energy volumes provided by the Balancing Service Provider (BSP).</p>		



<b>History:</b>	<p>P375 was raised by Flexitricity on 10 December 2018. The Initial Written Assessment was presented to the Panel on 13 December 2018 and was entered into the Assessment Procedure. P375 and P376 are being progressed separately, but with similar Workgroup Members and as such, Workgroup meetings will be held together where appropriate.</p> <p>The first Workgroup meeting, held jointly with P376, was on 25 January 2019. The Workgroup discussed possible effects on the Boundary Site and how links with National Grid would affect the eventual solution.</p> <p>The second Workgroup meeting was on 18 March 2019 in conjunction with P376. The Workgroup discussed metering standards and processes for secondary asset metering for use for balancing services and settlement as well as the line loss methodology to be applied. The Workgroup also considered how asset meters should be registered.</p> <p>The third Workgroup meeting was on 16 May 2019. The Workgroup reviewed the draft Code of Practice for Asset Metering behind the Boundary Point and the work in progress Business Requirements. The Workgroup agreed that further consideration of the assurance regime, reporting and the types of behind the Boundary Point meters that should be included in the P375 solution are required..</p> <p>The BSC Panel approved a six-month extension to the P375 Assessment Procedure at their meeting on 13 June 2019. The P375 Assessment Report will be presented to Panel at its January 2020 Panel meeting.</p> <p>The fourth Workgroup was held on 4 July 2019. The Workgroup discussed the customer journey registration process and the role of Meter Operator Agents. The Workgroup reviewed a use case to illustrate a ‘metering by differencing’ approach with multiple VLP actions on a site as well as Performance Assurance Techniques for VLPs.</p> <p>The fifth P375 Workgroup was held on the 20 August 2019. The Workgroup conducted a detailed review of the business requirements and Asset Metering Code of Practice 11.</p> <p>The sixth Workgroup meeting was held on 6 November 2019. The Workgroup reviewed the solution as an end to-end solution, leading to tweaks being made once the component parts were reviewed in entirety.</p>
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	Given the complexity of aligning solutions and legal text with P379, the Assessment Phase was extended by three months at the December 2019 Panel meeting. This was extended by a further six months in April 2020 due to the interactions with P392, Covid-19 and delays with legal text.
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<b>P376: Utilising a Baseline Methodology to set Physical Notifications for Settlement of Applicable Balancing Services</b>		<b>Update</b>	
<b>Date Raised:</b>	11 December 2018	<b>Proposer:</b>	Enel Trade S.P.A.
<b>Target Implementation Date:</b>	TBC	<b>Current Status:</b>	Assessment Procedure
<b>Latest Update:</b>	As per ELEXON's communication concerning the impact of COVID-19, we now expect to issue the Assessment Procedure Consultation in July 2020 instead of May 2020, as it has a significant impact on Parties, particularly Virtual Lead Parties and Suppliers. We have issued the P376 Business requirements to our service providers to understand the system impacts of the proposed solution on BSC Systems. The Impact Assessment is due to be returned 30 June 2020. This constitutes a one month delay caused by resources focussing on operational issues caused by COVID-19.		
<b>Next Event:</b>	Following the Service Provider Impact Assessment, the Workgroup will meet in July to consider the impacts and prepare its Assessment Procedure Consultation for issuing in July 2020.		
<b>Issue:</b>	ELEXON raised Issue 71 'Introduction of a baselining methodology as an alternative to Physical Notifications' on 15 June 2018. This Modification builds on the back of this Issue and formally raises a Modification Proposal relating to the same defect. Modification Proposal P344 'Project TERRE implementation into GB market arrangements' seeks to align the Balancing and Settlement Code (BSC) with the European Balancing Project TERRE (Trans European Replacement Reserves Exchange) requirements. The solution developed by the P344 Workgroup allows customers (or independent aggregators acting on their behalf) to participate in TERRE (and the BM) independently of their electricity Supplier, by registering a 'Secondary BM Unit'. The P344 solution is intended to facilitate participation in the BM and TERRE by a wider range of industry market participants, including customers and independent aggregators. However, in the P344 solution, the existing BM Settlement arrangements remain unchanged.		
<b>Current Solution:</b>	This Modification proposes to allow the Final Physical Notification which feeds into the Settlement of Trading Charges to be created via a Baseline Methodology. This Modification builds on the work of <a href="#">Issue 71</a> .		



<b>History:</b>	<p>The Initial Written Assessment was presented to the Panel on 13 December 2018 and was entered into the Assessment Procedure.</p> <p>P376 was raised by Enel Trade S.P.A. on 11 December 2018.</p> <p>The first Workgroup meeting, held jointly with P375, was held on 25 January 2019, where the Workgroup explored the issue by discussing possible effects on the Boundary Point and how links with National Grid would affect the eventual solution.</p> <p>The second Workgroup for P376 was held in conjunction with P375 on 18 March 2019 to begin the process of designing a solution and exploring assurance methods in order to protect the integrity of the eventual solution.</p> <p>ELEXON worked with the Proposer to identify characteristics of baseline methodologies currently used in other markets.</p> <p>The third Workgroup was held on 3 June 2019, where the Workgroup considered baseline methodologies.</p> <p>ELEXON worked with the Proposer to draft initial Business Requirements and considered what analysis, if any, should be undertaken on preferred baselining methodologies.</p> <p>The fourth Workgroup was held on the 14 August 2019 to consider and develop the Business Requirements. ELEXON issued a Request for Information to support analysis on 23 September 2019 with responses due 11 October 2019. ELEXON is working with industry participants to ensure we have sufficient data to produce meaningful analysis to support the P376 solution. We are also working with the teams for P375 and P379 to ensure the Business Requirements are supportive of each other. The fifth Workgroup was held 10 December 2019 to review an industry Request for Information and finalise the Business Requirements. Following the fifth Workgroup meeting, ELEXON has amended the Business Requirements to account for feedback from Workgroup Members.</p>
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<b><u>P379: Multiple Suppliers through Meter Splitting</u></b>		<b>Update</b>	
<b>Date Raised:</b>	3 January 2019	<b>Proposer:</b>	GridBeyond
<b>Target Implementation Date:</b>	November 2022 (subject to impact assessment)	<b>Current Status:</b>	Assessment Procedure
<b>Latest Update:</b>	As per ELEXON's communication concerning the impact of COVID-19 the timeline for P379 has been pushed back at least three months as it has a significant impact on Parties, particularly Suppliers, Data		



	<p>Collectors and parties looking to become secondary Suppliers. We now expect to issue the cost-benefit analysis in September 2020, subject to tendering for the CBA to a third party. The Panel requested that ELEXON carry out a Cost Benefit Analysis (CBA) to determine the merits in continuing with Modification P379, at its March 2020 BSC Panel meeting. At its May 2020 meeting, the Panel asked ELEXON to consider the possibility of external consultants to carry out the cost/benefit analysis following a paper on the high-level scope and approach to the CBA.</p>
<b>Next Event:</b>	<p>We are defining tender requirements to inform whether a third party should assist in the production of the CBA, including costs and timescales. We will present our findings at the July 2020 Panel meeting.</p>
<b>Issue:</b>	<p>In the view of the Proposer, this Modification will address a significant barrier to competition in the market rules whereby multiple Trading Parties are unable to compete for behind the Meter energy volumes, measured at the same Settlement Meter at the BSC Boundary Meter Point. The Proposer outlines that the existing arrangements do not adequately facilitate the development of local energy markets and supply innovation, and effectively mean there is a monopoly of one Party, the default Supplier, over a consumer's energy volumes behind a Settlement Meter at any given time, restricting competition and innovation.</p>
<b>Current Solution:</b>	<p>This Modification will enable individual consumers to be supplied by multiple Trading Parties, including Suppliers through a Balancing and Settlement Code (BSC) Settlement Meter at the Boundary Point. It will amend the market rules to support development of non-traditional business models and innovation, expanding upon the solution to be implemented by BSC Modification P344 'Project TERRE implementation into GB market arrangements'. It will achieve this through the creation of a new Party Agent role, the Customer Notification Agent (CNA), who would reconcile power flows through the Settlement Meter, enabling accurate allocation of volumes and costs, which in turn will allow Trading Parties to reflect these volumes in their bills and payments to consumers.</p>



<p><b>History:</b></p>	<p>P379 was raised by New Anglia Energy on 3 January 2019 with the Initial Written Assessment presented to the BSC Panel at its meeting on 10 January 2019. The Panel determined that P379 should be submitted to the Assessment Procedure, with the Assessment Report to be presented to the Panel at its meeting on 12 September 2019. The Panel requested an interim report on P379 at its June 2019 meeting.</p> <p>The first P379 Workgroup meeting was held on 27 February 2019. The group considered the Terms of Reference and discussed views on the proposal. ELEXON took a number of actions arising from the meeting, including further areas for consideration.</p> <p>Following the first Workgroup discussions ELEXON updated and issued two use cases for the Workgroups review prior to the next meeting.</p> <p>The second P379 meeting was held on 3 April 2019. The purpose of the meeting was to:</p> <ul style="list-style-type: none"> <li>• To clarify the P379 issue and scope;</li> <li>• To discuss Workgroup views and feedback on use cases 1 (Electric Vehicle) and 2 (Exempt supply);and</li> </ul> <p>For Ofgem to provide an overview on Network Access and Forward-Looking Charge Arrangements Significant Code Review.</p> <p>The third P379 Workgroup was held on 18 April 2019. The purpose of the meeting was to finish discussions on the Exempt Supply Use Case. To provide more background information on Exempt Supply requirements Ofgem presented on the Exempt Supply framework and how this works within the current market. In addition ELEXON provided an overview of the existing options for non-licenced entities selling power over the Distribution Network Operator's (DNO) network and how the P379 solution could potentially work.</p> <p>An interim report was presented to the Panel on 13 June 2019, as agreed as part of the approved P379 progression plan. The Panel approved a six-month extension and advised the Workgroup to consider how the Modification could be scoped to deliver earlier. A meeting was held on 27 June 2019 to finish discussing balance responsibility and the Party Agent Role.</p> <p>The P379 WG6 and WG7 meetings were held on 23 and 24 July 2019 respectively. The Workgroup considered two 'operating models' for the P379 solution, highlighting the key priorities and areas of concern. A key part of P379 is the provision of metered data for assets (e.g. electric vehicle) behind the Boundary Point Meter. ELEXON provided an update on P375, which is looking at metering systems not installed</p>
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at the Boundary Point. Further P375 updates will be provided to the P379 Workgroup.

The P379 Workgroup 8 meeting was held on 13 August 2019. ELEXON presented the detailed proposed, and alternative models covering the different entities and functions involved in multiple supply. The Workgroup agreed with processes in both models. The Workgroup also considered the following items: P379 FAQ, Performance assurance, data flows and whether multiple supply will be optional or mandatory.

The P379 Workgroup 9 meeting was held on 24 September 2019. At the meeting Ofgem presented on Key design considerations. The Workgroup discussed the P379 high level Business Requirements, the Policy and Regulatory Log and complex use cases. ELEXON has drafted the detailed Business Requirements to be reviewed by the WG at the next meeting to be held in November 2019.

The P379 meeting (WG9) was held on 24 September 2019. At the meeting Ofgem presented on Key design considerations. The Workgroup reviewed the P379 high level Business Requirements, P379 Policy - Regulatory Log and complex use cases. ELEXON has drafted the detailed Business Requirements for WG review.

The P379 WG10 was held on 3 December 2019. The purpose of the meeting was to review the detailed P379 Business Requirements and agree next steps for Impact Assessment.

The last P379 meeting (WG11) was held on 3 February 2020. The purpose of the meeting was to review the P379 Business Requirements.

Between October 2019 and February 2020 the P379 Workgroup held three meetings to review the extensive P379 Business Requirements (over 50 pages). At its meeting on 3 February 2020, ELEXON informed the Workgroup that the P379 Proposer intends to withdraw the Modification. ELEXON informed the Workgroup that it is engaging with Parties who are considering adopting it. The Workgroup expressed a desire to issue the impact assessment, even if P379 is withdrawn. In the event P379 is closed, the Workgroup proposed the impact assessment is issued and its responses published. This was to provide important evidence in establishing the benefits case for multiple Suppliers and facilitate any other party that may wish to raise a new Modification Proposal.



	<p>The Workgroup requested a seven month extension to the P379 Assessment Procedure, returning with the Assessment Report to the September 2020 Panel meeting at the February 2020 Panel meeting. The Panel requested that the P379 Workgroup provide an Interim Assessment Report for their consideration before approving an extension.</p> <p>At the March 2020 BSC Panel meeting, the P379 Workgroup provided an Interim Assessment Report to the BSC Panel’s consideration before approving an extension. The Panel was informed that the original P379 Proposer, New Anglia Energy, withdrew P379 on 26 February 2020. GridBeyond adopted P379 on 26 February 2020 and are now the P379 Proposer.</p> <p>At the March 2020 meeting, following the presentation of an Interim Report, the BSC Panel approved an eight month extension to allow ELEXON to conduct a Cost Benefit Analysis (CBA) for P379.</p>
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<b><u>P390: Allowing extensions to ELEXON’s business and activities, subject to additional conditions</u></b>		<b>No Update</b>	
<b>Date Raised:</b>	12 August 2019	<b>Proposer:</b>	E.ON
<b>Target Implementation Date:</b>	5 Working Days after Authority decision	<b>Current Status:</b>	Report Phase
<b>Latest Update:</b>	<p><b>The timeline for P390 is not impacted by the COVID-19 prioritisation.</b></p> <p>The Draft Modification Report was presented to the Panel at their May 2020 meeting. The Panel unanimously agreed to recommend to Ofgem that P390 be approved. The Final Modification Report was submitted to Ofgem for decision on 21 May 2020.</p>		
<b>Next Event:</b>	Ofgem will determine whether to approve or reject P390. Ofgem normally determine whether to approve or reject a Modification within one month of receipt.		
<b>Issue:</b>	<p>The BSC restricts the activities of ELEXON and in the absence of a specific Modification any additional activities cannot be pursued by ELEXON (even when those activities would be of benefit to BSC Parties, industry generally and/or the consumer). In the past specific Modifications have been necessary which have enabled ELEXON to provide the Warm Homes Discount Reconciliation service, EMR settlement, and to participate in gas performance assurance framework and REC manager appointment processes.</p> <p>Such individual Modifications to extend ELEXON’s vires are time consuming and can be an unnecessary distraction for industry. They can also result in ELEXON being unable to pursue an opportunity within a required timeframe.</p>		



<p><b>Current Solution:</b></p>	<p>A framework into the BSC that allows the ELEXON Board to determine whether ELEXON can undertake additional activities provided certain conditions are met. All of the conditions introduced in previous Modifications to ELEXON’s vires, P330 ‘Allowing ELEXON to tender for the Uniform Network Code Gas Performance Assurance Framework Administrator (PAFA) role’ and P365 ‘Enabling ELEXON to tender for the Retail Energy Code (REC)’ are included, plus some additional conditions to safeguard the interests of BSC Parties.</p>
<p><b>History:</b></p>	<p>P390 was raised by E.ON on 12 August 2019. The IWA was presented to the Panel on 12 September 2019. ELEXON are ascertaining the most appropriate date for the first Workgroup, proposed for early October 2019 subject to the availability of the minimum number of members to be quorate. This has involved direct engagement with industry members with experience as a Workgroup member for similar modifications, as well as reminding industry about the Modification via communications channels. The first P390 Workgroup was held on 18 November 2019, where discussions focused on finding the appropriate balance between enabling the ELEXON Board to bid for appropriate opportunities of interest while ensuring that appropriate oversight and transparency remain for BSC Parties. ELEXON took several actions away and agreed to present some different options for the incorporation of a Panel or industry consultation within the P390 solution. Workgroup Members were generally comfortable with the proposed conditions for P390, however it was agreed to reintroduce the ‘undue competitive advantage’ Ofgem criteria, on the basis that it reaffirms conditions already present in the BSC and alleviates a concern raised by Ofgem. Due to delays securing the necessary number of Workgroup members to be quorate, we have been unable to meet the originally agreed timetable for P390, although good progress is now being made. The second P390 Workgroup meeting was held on 18 December 2019, where the Workgroup developed the solution. At the meeting Ofgem provided an update to the group that the Authority are currently considering the P390 solution against the Electricity Transmission Standard Licence Conditions. ELEXON met with Ofgem (15 January 20) to discuss their interpretation of the case for Authority consent for any expansion in ELEXON vires. ELEXON invited Ofgem to identify who they were seeking to protect and from what and how their concerns were not addressed in the proposed P390 conditions. On 22 January 20 Ofgem communicated a minded-to-position that the Authority should retain their role of consenting to expansions of ELEXON’s role. Ofgem believe it consistent with the licence which envisages a consent role for Ofgem. The Code Governance Review identified issues with the current framework including with accountability, and in this context Ofgem think that now is not the right time to change this role. The Workgroup has now agreed a solution for consultation. The P390 solution now involves ELEXON issuing a consultation and sending responses and the Board’s views on the P390 conditions to Ofgem for a 15 Working Day window. Ofgem may reject the proposal or request an extension if they need more time– if no action is taken then consent is implied. This meets</p>



	<p>the criteria for Ofgem acceptance, desire for industry engagement and efficiency versus a Modification. The Assessment Procedure Consultation for P390 closed on Monday 2 March 2020. The Workgroup initially recommend approval.</p> <p>The Assessment Report for P390 was presented to the Panel at their April 2020 meeting. The Panel initially believe P390 should be approved. The Report Phase Consultation was issued on 14 April 2020 and closed on 29 April 2020. All three respondents agreed with the Panel views.</p>
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<b><u>P395: Excluding generators from BM Unit Gross Demand and the calculation of EMR Supplier Charges</u></b>		<b>No Update</b>	
<b>Date Raised:</b>	7 November 2019	<b>Proposer:</b>	Centrica
<b>Target Implementation Date:</b>	TBC	<b>Current Status:</b>	Assessment Procedure
<b>Latest Update:</b>	<p><b>The timeline for P395 is not impacted by the COVID-19 prioritisation.</b></p> <p>The Panel approved a six month extension to the Assessment Procedure to P395 to allow for further solution development, returning with the Assessment Report at the October 2020 meeting. Due to consequential BSC changes for Ofgem’s Significant Code Review Trading Charging Review (P402), progression on P395 has been delayed. While one Workgroup meeting has been held, further work to develop the solution and associated requirements is required before impact assessment can occur. We note that due to dependencies on other Modifications, implementation of P395 is unlikely to be targeted before 2022 and we do not believe this delay will impact the P395 delivery.</p>		
<b>Next Event:</b>	ELEXON are progressing actions taken from the first meeting while ascertaining the best time for the next meeting.		
<b>Issue:</b>	Currently the BM Unit Gross Demand Report attributes to Suppliers electricity they have provided to generators (including storage facilities) operated by Generation Licensees, which falls outside the definition of ‘supply’ in the Electricity Act 1989.		
<b>Current Solution:</b>	P395 proposes to amend BSC systems and processes so that the SAA-I042 ‘BM Unit Gross Demand Report’ only includes electricity ‘supplied’ to premises by licensed Suppliers, and therefore excludes electricity imported by Generators operated by a licensee for generation activities (i.e. those activities authorised by their generation licence to carry on). To facilitate this outcome, P395 proposes that the BSC incorporates the interim solution and extends it to cover complex sites too. This solution would cover sites connected to both the distribution and transmission systems, and where the sites Metering Systems are registered in Supplier Meter Registration Service (SMRS) or Central Meter Registration Service (CMRS). P395 will build on top of capabilities being introduced by P344, P375 and P383.		
<b>History:</b>	P395 was raised by Centrica on 7 November 2019. The Panel considered the IWA on 14 November 2019 and agreed to advance the		



	<p>Modification to the Assessment Procedure. There was a delay in holding the first P395 Workgroup meeting caused by the urgent request to progress P397.</p> <p>The first meeting of the P395 Workgroup was held on 19 February 2020, with the Workgroup and Proposer agreeing with ELEXON’s interpretation of ToR A) ‘Which imports should be chargeable?’ The Workgroup noted that answering the P395 problem satisfactorily will involve consideration of scalability, practicality and cost to ensure that the solution is truly enduring, consistent with regulations and scalable to domestic level.</p>
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<b>P397: Assessing the costs and benefits of adjusting Parties’ Imbalances following a demand disconnection</b>		<b>No update</b>	
<b>Date Raised:</b>	7 November 2019	<b>Proposer:</b>	BSC Panel
<b>Target Implementation Date:</b>	5WD following Authority approval.	<b>Current Status:</b>	Report Phase
<b>Latest Update:</b>	<p><b>The timeline for P397 is not impacted by the COVID-19 prioritisation.</b></p> <p>The Authority sent back the P397 Final Modification Report with a request for further evidence to be gathered for it to make an informed decision. ELEXON presented the P397 Draft Send Back Process to the Panel on 12 March 2020, detailing its approach to gathering the required information. The Panel approved the proposed timeline, which includes the amended P397 Final Modification Report to be presented to the Panel at its meeting on 09 July 2020.</p>		
<b>Next Event:</b>	An amended P397 Modification Report will be presented to the Panel at its meeting on 09 July 2020.		
<b>Issue:</b>	Settlement Adjustment Processes (also known as the ‘bottom-up’ processes) introduced into the Balancing and Settlement Code (BSC) under P305 ‘Electricity Balancing Significant Code Review Developments’ in November 2015 may not be efficient to run in all circumstances, for example, when considering a Demand Control Event (DCE) that has minimal material impact on Settlement. This possibility was highlighted following the DCE which occurred on 9 August 2019.		
<b>Current Solution:</b>	P397 seeks to introduce a mechanism through which the Balancing and Settlement Code Company (BSCCo) determines whether Licensed Distribution System Operators (LDSOs), the National Electricity Transmission System Operator (NETSO), certain Party Agents and BSC Agents, and BSCCo should carry out the Settlement Adjustment Processes following a DCE. BSCCo would determine the nature of the DCE and, where necessary, determine and compare the costs and value of the DCE in order to determine whether the value of carrying out the Settlement Adjustment Processes outweighs the costs.		
<b>History:</b>	P397 was raised by the BSC Panel at its meeting on 12 December 2019. The BSC Panel agreed to raise P397 by majority at its meeting on P397 was raised by the BSC Panel at its meeting on 12 December 2019 and sent it directly to the Report Phase. P397 was issued for a 15 WD		



	<p>industry consultation on 16 December 2019 and concluded on 08 January 2020.</p> <p>Responses from the Report Phase Consultation were presented to the Panel at its meeting on 16 January 2020. Following guidance from Ofgem the Panel sent P397 to the Authority for decision, instead of treating P397 as a Self-Governance Proposal. The Panel recommend P397 is approved.</p>
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<b>P398: Increasing access to BSC Data</b>		<b>Update</b>	
<b>Date Raised:</b>	12 December 2019	<b>Proposer:</b>	BSC Panel
<b>Target Implementation Date:</b>	TBC	<b>Current Status:</b>	Assessment Procedure
<b>Latest Update:</b>	<p><b>The timeline for P398 is not impacted by the COVID-19 prioritisation.</b> The Assessment Consultation has been delayed due to a cyber-attack on our internal IT systems. Almost all work had to stop on P398 during the Cyber-attack, it is therefore requested that the Consultation and Panel Reports be delayed by a further month to reflect this.</p>		
<b>Next Event:</b>	<p>Legal text is being finalised and the Assessment Consultation will be issued in July 2020.</p>		
<b>Recommendation</b>	<p><b>We request a one month extension to the P398 Assessment Procedure, returning with the Assessment Report to the October 2020 Panel meeting, or earlier if possible.</b></p>		
<b>Issue:</b>	<p>In June 2019 the Energy Data Task Force (EDTF) published its report '<a href="#">A Strategy for a Modern Digitalised Energy System</a>'. One of its recommendations was that the energy sector should 'adopt the principle that Energy System Data should be Presumed Open'. The EDTF report recommends that BEIS and/or Ofgem should use legislative and regulatory powers to achieve this recommendation.</p> <p>The BSC does not currently fully support the open data principles as recommended by the EDTF. This Modification seeks to implement market leading working practises regarding data availability within the BSC.</p>		
<b>Current Solution:</b>	<p>P398 proposes amending the BSC so that all data is assumed open unless there is a reason otherwise. The Panel (or delegated Sub-Committee) will determine if there is any reason not to make data available. This will be done based on a transparent process of triage and categorisation. In the longer term, we will look at an IT solution to make accessing BSC data even easier than having to make a formal request for release/publication.</p>		
<b>History:</b>	<p>P398 was raised by the BSC Panel at its meeting on 12 December 2019. The first Workgroup meeting was held in January 2020. We have been liaising with Ofgem since P398 was raised.</p> <p>The Panel approved a two month extension at its April 2020 meeting. The Assessment Report will be presented at the July 2020 Panel meeting. This was granted to allow time to finalise legal text drafting</p>		



	and follow-up work from the previous Workgroups that is taking longer than expected.
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<b>P399: Making the identity of Balancing Service providers visible in the Balancing Services Adjustment Data</b>		<b>Update</b>	
<b>Date Raised:</b>	24 December 2019	<b>Proposer:</b>	Sutton Bridge Power Generation
<b>Target Implementation Date:</b>	TBC (to be confirmed through Modification Assessment)	<b>Current Status:</b>	Assessment Procedure
<b>Latest Update:</b>	<p><b>The timeline for P399 is not impacted by the COVID-19 prioritisation.</b></p> <p>The outcomes of the Impact Assessments were presented to the Workgroup at its meeting on 27 March 2020. National Grid ESO noted that in its current state, P399 would cost ~£2 million to implement and so proposed an alternative route forward that could significantly reduce costs and lead times. The Workgroup agreed that this would be the best way forward and NGENSO committed to completing the relevant Impact Assessments and to provide a timeline as to how quickly this would be completed. NGENSO have now confirmed that this IA will be returned by 30 June 2020 and the Workgroup will reconvene on 17 July 2020 to discuss it.</p>		
<b>Next Event:</b>	<p>NGESO will provide a revised impact assessment by 30 June 2020. Once the impact assessment has been submitted, the Workgroup will consider the assessment at its meeting on 17 July 2020 and provide its initial views for consultation.</p>		
<b>Issue:</b>	<p>Currently, each Balancing Adjustment Action taken outside the Balancing Mechanism is reported with a unique sequential number. The Proposer contends that this does not identify the counterparty to the bilateral trade and creates an information advantage to those counterparties, reducing transparency in the operation of the system creating a barrier to effective competition.</p>		
<b>Current Solution:</b>	<p>P399 seeks to create a level-playing field for information relating to BM and non-BM trades. Currently it seeks to include information identifying the provider of non-BM balancing, tendered status, technology type and location. The Workgroup are working with NGENSO to identify the best way to provide this data for publication on BMRS.</p>		
<b>History:</b>	<p>P399 was raised by Sutton Bridge Power Station on behalf of Calon Energy on 24 December 2019.</p> <p>The IWA for P399 was presented to the BSC Panel on 16 January 2020, where it was approved for progression to the Assessment Phase. The first Workgroup meeting was held on 27 January 2020 where the Workgroup agreed two possible solutions.</p> <p>The two potential solutions were impact assessed by ELEXON and National Grid ESO, which were subsequently returned prior to the second Workgroup meeting due to be held on 27 March 2020.</p> <p>The Panel granted a two month extension to P399 at its meeting in April 2020 to allow time for NGENSO to conduct a further impact assessment.</p>		



	The second Workgroup was on 30 March 2020. This allowed the Workgroup to review the proposed solution in entirety (the first Workgroup looked at the solution principles and in modules) as well as allowing ELEXON to clear up outstanding questions in relation to drafted legal text.
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<b>P402 : Enabling reform of residual network charging as directed by the Targeted Charging Review</b>		<b>Update</b>	
<b>Date Raised:</b>	5 March 2020	<b>Proposer:</b>	NGESO
<b>Target Implementation Date:</b>	1 April 2022	<b>Current Status:</b>	Assessment Procedure
<b>Latest Update:</b>	P402 has been staggered, despite being a priority, as it reduces the burden on industry in the short term, whilst allowing sufficient time for the Modification to conclude in good time. The second P402 Workgroup meeting took place on 6 May to consider alternative approaches to P402.		
<b>Next Event:</b>	The P402 business requirements are now being finalised and legal text drafted. A Workgroup meeting will be held in July to gather Workgroup views for consultation.		
<b>Issue:</b>	Following the conclusion of its Targeted Charging Review Significant Code Review, Ofgem directed National Grid and certain LDSOs to make changes to how residual revenues are recovered through Distribution Use of System (DUoS) and Transmission Network Use of System (TNUoS) demand charges. ELEXON understands that the LDSOs have or can procure all data necessary to implement the TCR SCR changes in relation to demand residual charging. However, NETSO does not have access to the relevant data.		
<b>Current Solution:</b>	P402 will introduce new reporting requirements on LDSOs and BSCCo that will ensure the provision of data to enable the NETSO to set TNUoS demand residual tariffs and enable accurate billing of subsequent charges.		
<b>History:</b>	National Grid ESO raised P402 on 5 March 2020. The BSC Panel considered the IWA at its meeting on 12 March 2020 and approved a 3 month Assessment Procedure, noting the challenging timeline to meet the Ofgem set implementation date of 1 April 2021. The BSC Panel considered the IWA at its meeting on 12 March 2020 Following a revised implementation plan by Ofgem, delivery of TCR changes has been pushed to April 2022 – one year later than previously required. The Panel approved a three month extension to the P402 Assessment Procedure at its May 2020 meeting. This was to allow the Workgroup to consider alternative approaches to solving the P402 issue, whilst recognising that work must continue in an expedient fashion to allow market participants enough time to amend their systems following approval of the Modification. The Assessment Report will now be presented in September 2020. The first P402 Workgroup meeting took place on 31 March to review the draft business requirements.		



<b>P407: Project MARI</b>			<b>Update</b>
<b>Date Raised:</b>	4 May 2020	<b>Proposer:</b>	NGESO
<b>Target Implementation Date:</b>	By July 2020	<b>Current Status:</b>	Assessment Procedure
<b>Latest Update:</b>	The first Workgroup took place on 23 June 2020. This Workgroup was intended as a soft introduction to Project MARI. The meeting focused on providing an overview of MARI, the Registration process, Qualification and testing. Workgroup members suggested revisions to the Grid Code terms of reference. Workgroup members also requested clarification around existing Interconnector issues.		
<b>Next Event:</b>	P407 will be developed by a cross-code Workgroup in the Assessment Procedure. The second Workgroup is planned for 7 July 2020 and will cover Bid Submission and Acceptance. The purpose of the meeting will be to consider outcomes of action from Workgroup meeting 1 and to assess the submission and acceptance options for P407/GC0145 and agree the way forward.		
<b>Issue:</b>	Article 20 of the EBGL (Commission Regulation (EU) 2017/2195) requires Transmission System Operators (TSOs) to establish a platform for the exchange of balancing energy from manually activated frequency restoration reserves (mFRR) by July 2022. To achieve this, the European Network of Transmission System Operators for Electricity (ENTSO-E) launched the Manually Activated Reserves Initiative (MARI) to deliver the European wide mFRR platform. P407 will ensure that the BSC, and associated systems, are amended ahead of go-live.		
<b>Current Solution:</b>	P407, along with the NGESO changes, will enable GB participants to participate in MARI.		
<b>History:</b>	The Panel determined that P407 should progress to the Assessment Procedure at its meeting on 14 May 2020. National Grid Electricity System Operator raised P407 'Project MARI' on 4 May 2020.		

<b>P408: Simplifying the Output Usable Data Process</b>			<b>Update</b>
<b>Date Raised:</b>	5 May 2020	<b>Proposer:</b>	NGESO
<b>Target Implementation Date:</b>	November 2020	<b>Current Status:</b>	Report Phase
<b>Latest Update:</b>	The Report Phase Consultation closed on 25 June 2020 with one respondent who were supportive of P408.		
<b>Next Event:</b>	The Draft Modification Report will be presented to the Panel on 9 July 2020.		
<b>Issue:</b>	P408 is being raised as a consequential BSC Modification to Grid Code Modification GC0130. Currently, Output Usable, Margin and Surplus data provided under the Grid Code is published on BMRS. Without P408, the BSC and Grid Code will not be aligned and the improved		



	market transparency and efficiency through provision of additional Output Usable, Margin and Surplus data in the two to three year ahead timescales will not be available on BMRS.
<b>Current Solution:</b>	To publish the amended Output Usable, Margin and Surplus data from GC0130 on BMRS.
<b>History:</b>	NGESO raised P408 on 5 May 2020. The Panel progressed P408 direct to the Report Phase with an initial recommendation to approve as a Self-Governance Modification.

<b>P409: Aligning BMRS Reporting Requirements with the Clean Energy Package</b>			<b>Update</b>
<b>Date Raised:</b>	12 May 2020	<b>Proposer:</b>	NGESO
<b>Target Implementation Date:</b>	5 November 2020	<b>Current Status:</b>	Submission
<b>Latest Update:</b>	The Initial Written Assessment was presented at the June 2020 Panel meeting, and subsequently circulated for Report Phase Consultation, with an initial recommendation approve as a Self-Governance Modification. This closed on 29 June 2020.		
<b>Next Event:</b>	The P409 Draft Modification Report will be presented to the Panel on 9 July 2020.		
<b>Issue:</b>	The BSC text does requires certain balancing information to be published within 45. The Clean Energy Package requires this information to be published within 30 minutes.		
<b>Current Solution:</b>	In practice the data is published within 30 minutes, so no system changes are required. However, the BSC will be updated to reflect the current practice of publishing the data within 30 minutes.		
<b>History:</b>	P409 was raised on 12 May 2020.		



## Change Proposal Updates – up until decision

<b>CP1527: Increase the minimum data storage capacity for Settlement Outstations and mandate specific selectable integration periods for Metering Codes of Practice</b>			<b>Update</b>
<b>Date Raised:</b>	28 January 2020	<b>Proposer:</b>	ELEXON
<b>Target Implementation Date:</b>	30 June 2022	<b>Current Status:</b>	Assessment Procedure
<b>Latest Update:</b>	The CP1527 consultation responses was presented to the SVG and ISG for decision on 7 April 2020. Both Committees deferred their decision pending ELEXON completion of a Cost Benefit Analysis requested by the committees to determine the optimal days per channel at 30 minute integration periods.		
<b>Next Event:</b>	CP1527 will be presented to the SVG and ISG for decision on 7 July 2020.		
<b>Issue:</b>	In the view of the Proposer the minimum data storage requirements within the metering CoPs are now 30 years old, unreasonably low and should be changed. More Outstation memory will allow more time to retrieve metered data from an Outstation at a site where there is a remote communications issue and/or where local access, to get a hand held read, is problematic.		
<b>Current Solution:</b>	Increase the minimum data storage capacity requirements for Settlement Outstations to 250 days per channel at 30 minutes integration periods and this CP will also mandate selectable integration periods for CoPs 3, 5, and 10 and add a test for this requirement (and for CoPs 1 and 2) into BSCP601.		
<b>History:</b>	CP1527 was raised on 28 January 2020 by ELEXON. CP1527 was raised on 28 January 2020. The CP Progression paper was presented to the ISG and SVG on 4 February 2020. CP1527 was issued for consultation on the 10 February 2020 with responses due on the 6 March 2020. There were 10 respondents, six supporting the changes and four opposed.		

<b>CP1529: Earlier initiation of Supplier Agreed Meter Readings process</b>			<b>Update</b>
<b>Date Raised:</b>	6 May 2020	<b>Proposer:</b>	ELEXON
<b>Target Implementation Date:</b>	5 November 2020	<b>Current Status:</b>	Assessment Procedure
<b>Latest Update:</b>	The CP1529 consultation closed on 8 June 2020. In total six responses were received from a combination of Suppliers and Supplier Agents. Respondents were unanimous in their support of the CP1529 solution and all but one respondent were supportive of the redlining that would deliver it.		



<b>Next Event:</b>	The SVG will decided whether to approve or reject CP1529 at its meeting on 7 July 2020.
<b>Issue:</b>	Suppliers currently have to wait 30 Working Days (WD) before initiating the Supplier Agreed Meter Readings process, when Change of Supplier (CoS) readings are missing. One of the main aims of Ofgem's Switching Programme is to allow customers, whether domestic or non-domestic, to change Supplier no more than two WDs after the day on which the switch request is submitted. As part of the Switching Programme, the 'Standstill Period' is also being reduced. This is the period of time following a CoS during which a further registration cannot validly be requested. As a result of these shortened timeframes, there is the potential for multiple CoS events to happen during the 30 WD period, resulting in a chain of missing data and Suppliers settling on estimated energy.
<b>Current Solution:</b>	CP1529 intends to reduce the time that the old Supplier can invoke the process to chase missing Change of Supplier (CoS) reads from 30 Working Days (WD) to 15 WD (and from 32 WD to 17 WD for the new Supplier) within BSCP504.
<b>History:</b>	CP1529 was raised by ELEXON on 6 May 2020. At it's meeting on 3 March 2020 (SVG229/17) SVG confirmed they were happy for the CP to go straight to consultation phase and did not ask for any additional questions to be added to the CP Consultation.



## Issue Updates

<b>Issue 69: Performance Assurance Framework Review</b>		<b>Update</b>
<b>Date Raised:</b>	30 March 2017	<b>Proposer:</b> ELEXON
<b>Latest Update:</b>	The final Issue 69 meeting was held on Tuesday 31 March. The workshop looked at Data and reporting under the PAF including the data-centric techniques (Performance Assurance Reporting and Monitoring System (PARMS) and Material Error Monitoring (MEM). ELEXON will present recommendations for improvement at the July PAB meeting.	
<b>Next Event:</b>	There are no more planned Issue 69 Workgroups. The Issue 69 Report will be presented at the August 2020 Panel meeting.	
<b>Issue:</b>	ELEXON and the Performance Assurance Board (PAB) are aware of opportunities to further enhance the application of the risk-based Performance Assurance Framework (PAF) envisaged in <a href="#">P207 'Introduction of a new governance regime to allow a risk based Performance Assurance Framework (PAF)'</a> to utilise and reinforce its effectiveness to address the challenges of a changing industry. This Issue Group will explore the issues and identify possible solutions for each work stream: Smart Metering, PAF procedures, data provision and Performance Assurance Techniques.	
<b>History:</b>	<p>The first work stream was Smart Metering, with two meetings held on 25 April 2017 and 24 May 2017 respectively. The interim Issue Report for Smart Metering was presented to the PAB in June 2017, and tabled at the BSC Panel in July 2017. ELEXON took a paper to the November 2017 PAB meeting that provided recommendations on mitigating the key smart risk areas identified. A high-risk area was identified in relation to the Supplier-Agent interface and as a result CP1500 'Amend the BSCP537 Appendices to add a requirement for Suppliers and MOAs to demonstrate the ability to send and receive Smart Meter Configuration details' was raised, seeking to include the D0367 data flow in the Qualification process.</p> <p>The second work stream is on PAF procedures. This work stream will focus on a new design for the PAF, covering what is currently the Risk Evaluation Methodology (REM), Risk Evaluation Register (RER), Risk Operating Plan (ROP) and the reporting.</p> <p>The first Workgroup on PAF procedures was held on 17 January 2018. In the meeting, ELEXON presented a proposed design to the group for review and comment. The second meeting was held on 10 April 2018 to align with work we are doing for the Performance Assurance Framework review. Additionally, ELEXON presented a related draft Modification Proposal ('Amendments to Section Z to better facilitate the production of the Risk Evaluation Methodology, Risk Evaluation Register and Risk Operating Plan') and associated draft redlined Legal text to the Workgroup in order to gain their endorsement toward its principles.</p>	



The third meeting for this work stream was held on 12 June 2018 where the Workgroup discussed a newly drafted version of the RER. At this meeting, as the Workgroup consisted of SVA experts only, they could not provide feedback on the CVA risks listed within the RER. Therefore, a dedicated session for CVA experts to provide feedback on the RER was held on 25 July 2018. The fourth and final meeting for the PAF Procedures Work Stream will be held on 15 August 2018. At this meeting the ELEXON will present the final design of the PAF along with its component parts.

Modification P368 'Amendments to Section Z to better facilitate the production of the Risk Evaluation Methodology, Risk Evaluation Register and Risk Operating Plan' was approved by the BSC Panel at its meeting on 12 July 2018 and will be implemented in the November 2018 BSC Release. This Modification arose from work completed by the Issue 69 group relating to PAF procedures.

The last Issue Group for the PAF Procedures work stream was held on 15 August 2018, with subsequent teleconference meetings held on 30 and 31 August 2018. During these sessions, ELEXON presented the final design of the PAF along with its component parts, on which the Issue Group members provided guidance and comment.

The third work stream, the Review of the PATs, aimed to catalogue the current performance assurance techniques (PATs), identify limitations or areas for improvement (based on stakeholder feedback and further discussion with technique owners), and integrate those improvements into a set of new PATs.

The first working group for this work stream took place on 30 November 2018. The working group discussed the key ideas for change to the audit techniques, and identified some additional potential improvements

The final work stream aims to identify and test alternative methods of data provision that will place less burden on participants to provide data, and will help support more accurate risk appraisal.

The first working group for this work stream took place on 3 October 2018, with subsequent working groups scheduled for roughly every quarter.

ELEXON presented the latest version of the Risk Register to the Performance Assurance Board (PAB) at its meeting on 29 November 2018, requesting that the document be approved for public consultation. The PAB commented positively on the revisions made to the Register, including the introduction of a materiality (£) figure associated with each risk to measure its impact, and noted that the reduction in the number of distinct risks, whilst maintaining total coverage of all potential risk events, made the Register more accessible and easier to navigate. The first Issue 69 working group for the Performance Assurance Techniques work stream was held on 30 November 2018. Summary notes from the Workgroups were sent to



	<p>members. Following the consultation period ending 21 December 2018, the PAB approved the new Risk Register on 31 January 2019.</p> <p>The Performance Assurance Board (PAB) suggested engagement with the Issue 69 workgroup (in particular Suppliers) on Supplier Charges review.</p> <p>The dates for workstreams on Supplier Charges review and BSC Audits as part of Issue 69 have been confirmed. Engagement with Issue 69 stakeholders for both the Performance Assurance Techniques Review and Data Provision workstreams is expected in spring 2019.</p> <p>The workstreams for the Supplier Charges review and the BSC Audit was held on Tuesday 14 May and Wednesday 15 May 2019 respectively.</p> <p>Issue 69 will now be focussing on Qualification and Re-Qualification well as Supplier Charges.</p> <p>The Issue 69 Qualification and Re-Qualification Workshop was held on Tuesday 2 July 2019. Following this Workshop a paper was presented to PAB providing an update on the review of the Qualification and re-Qualification Performance Assurance Technique. The PAB noted the updates and agreed to a sub-group to discuss options to include in the final Qualification and Re-Qualification PAF Review recommendations report. Following the meeting of the sub group the PAF team presented their recommendation at September PAB meeting on 26 September 2019.</p> <p>The main review of the Supplier Charges technique has commenced. At the Issue 69 Working Group meeting on 19 September 2019 we reviewed our initial ideas for change.</p> <p>The Issue 69 Working Group met on 19 September 2019 to review our initial ideas for change. The recommendation of the Qualification workshop was presented to <a href="#">PAB (224/06)</a> at its meeting on the 26 September 2019. PAB approved the recommendation to raise a number of Modifications and Change Proposals with a view to implement them in approximately 18 months.</p> <p>An Issue 69 Workshop to review the Peer Comparison technique was held on 14 November 2019. The PAF review team presented their recommendations to PAB in January 2020.</p> <p>A further Issue 69 Working Group on Supplier Charges was held on the 28 January 2020 with a view to further refining the ideas towards a set of recommendations for the PAB.</p> <p>The final workstream under Issue 69 looked at Data and Reporting. The workstream included the data-centric techniques (Performance Assurance Reporting and Monitoring System (PARMS) and Material Error Monitoring (MEM)) and assessed:</p> <ul style="list-style-type: none"> <li>• Different approaches to future assurance data provision;</li> </ul>
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	<ul style="list-style-type: none"> <li>• Which options to obtain data are cost-effective and whether required change/development is proportionate to the level of risk they mitigate and automation they provide; and</li> <li>• General working practices that ELEXON and the Performance Assurance Board (PAB) adopt when using new data sources.</li> </ul>
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<b>Issue 83: Ensuring that the Buy Price Adjustment reflects all additional balancing costs incurred by NGESO</b>		<b>No update</b>	
<b>Date Raised:</b>	1 July 2019	<b>Proposer:</b>	Sebmcorp UK
<b>Latest Update:</b>	Issue 83 is effectively on hold until June 2020. At the second Workgroup meeting, on 11 October, NGESO agreed to consider how the inclusion and distribution of balancing costs incurred by NGESO would affect the value of the BPA, and consequently the Imbalance Price.		
<b>Next Event:</b>	The Proposer agreed that Issue 83 should be paused until there was greater certainty around the future of the Buy Price Price Adjustment. This will follow the development of the solution to implement the Imbalance Settlement Harmonisation Proposal into the GB trading arrangements on which ACER will make a decision by June 2020.		
<b>Issue:</b>	<p>The Issue will consider the principles set out in Article 52(2) of the Commission Regulation (EU) 2017/2195 of 23 November 2017, establishing a guideline on electricity balancing to assess how the components of the Buy Price Price Adjustment can continue to be used in the Imbalance Price calculation. This will aim to ensure that it continues to be reflective of the actions taken by National Grid Electricity System Operator.</p> <p>In addition to this, Issue 83 will consider what components are included in the Buy Price Price Adjustment, including reserve actions, to ensure that it continues to be properly reflective.</p>		
<b>History:</b>	<p>Issue 83 was raised by Sebmcorp UK on 1 July 2019.</p> <p>The first Workgroup was held on 7 August 2019, where it discussed the components that are incorporated in the Buy Price Price Adjustment and how these could continue to be reflected in the Imbalance Price. The second meeting for Issue 83 was held on 11 October 2019 where the Issue Group further considered what components make up the BPA and how it could continue to be reflected in pricing.</p>		

<b>Issue 86: Review of processes potentially impacted by Ofgem's Faster Switching Programme.</b>		<b>No Update</b>	
<b>Date Raised:</b>	9 October 2019	<b>Date Raised:</b>	9 October 2019



<b>Latest Update:</b>	ELEXON submitted the redlining for the Faster Switching and Retail Code Consolidation SCRs on 31 March 2020 as per the correspondence between the BSC Panel and Ofgem late February/early March 2020. Ofgem’s work on their faster switching programme has been delayed by Covid-19 and we are seeking guidance on new timelines.
<b>Next Event:</b>	Agreed outstanding items will be sent to Ofgem as soon as practicable. We await feedback from Ofgem on documents submitted to date as well as how their work is being impacted by Covid-19.
<b>Issue:</b>	<p>The Retail Energy Code (REC) and Central Switching Service (CSS) are key components of Ofgem’s Faster Switching Programme. The Retail Code Consolidation (RCC) Significant Code Review (SCR) will consolidate existing Industry Codes into the REC. RCC changes are expected to be implemented on 1 April 2021 and CSS changes in summer 2021.</p> <p>ELEXON, on behalf of the BSC Panel, is required to inform Ofgem how processes relating to Change of Supplier (CoS) and Change of Agent (CoA) may be impacted. These processes will likely impact:</p> <ul style="list-style-type: none"> <li>• Data Collectors (DCs)</li> <li>• Data Aggregators (DAs)</li> <li>• Meter Operator Agents (MOAs)</li> <li>• Suppliers</li> </ul>
<b>History:</b>	<p>The first Issue group was held on 29 October 2019. The Issue Group discussed changes required to the switching process in BSCP501 and BSCP537 Appendix one to align with the Retail Energy Code (REC) and Central Switching Service (CSS) planned go-live date of 1 April 2021. The Issue Group started to discuss whether the Settlement time lines will be compatible with Faster Switching. The second Issue group was held on 13 December 2019 to finish reviewing the core BSC changes for faster switching. The third Issue Group was held on 30 January 2020 to wrap up outstanding matters from the original scope and agree how the Issue Group will support preparation of the RCC redlining. Ofgem asked for further redlining to be provided for the Retail Code Consolidation Significant Code Review (SCR). Issue 86 was raised to consider the redlining needed for the Faster Switching SCR and has been extended, and the scope widened, to facilitate the new SCR.</p> <p>The fourth Issue Group was held on 6 March 2020 to review progress/direction of travel regarding SCR document drafting as well as to agree way ahead with interim quick wins. Draft redlining was submitted on 31 March 2020 as agreed between the BSC Panel and Ofgem</p>

<b>Issue 87: Busbar voltage transformer metering for Offshore wind farms under OFTO arrangements</b>		<b>Update</b>
<b>Date Raised:</b>	3 March 2020	<b>Proposer:</b> Siemens Transmission and Distribution Limited



<b>Latest Update:</b>	The first meeting was postponed due to a cyber-attack on ELEXON’s IT systems.
<b>Next Event:</b>	The first meeting of the Issue 87 group will now take place on Monday 6 July 2020.
<b>Issue:</b>	The size and weight of VTs used in Metering Systems of Offshore wind farms can add significant weight and space requirements to a project. This in turn can make developing new wind farms more complex and costly, which ultimately will have a negative effect for end consumers who will have to fund this through their energy bills. The Proposer believes that there are effective alternatives to this metering set up, which can reduce the number of VTs (and hence weight) required, without impacting on the quality of data used in Settlement.
<b>History:</b>	Siemens Transmission and Distribution Limited raised Issue 87 on 3 March 2020. After delays to holding the first Issue Group due to gouracy challenges, ELEXON scheduled a meeting for 21 May 2020.

<b>Issue 88: Clarification of BSC Arrangements relating to Complex Sites</b>		<b>No Update</b>	
<b>Date Raised:</b>	18 March 2020	<b>Proposer:</b>	ELEXON
<b>Latest Update:</b>	The first Issue Group meeting was held on 29 April 2020. The aim of the meeting was to outline the issues currently experienced with the Complex Sites arrangements and to determine the best way forward. ELEXON took actions to provide potential solutions to the Issue Group at its next meeting.		
<b>Next Event:</b>	The next Issue Group meeting will be held on 27 July 2020 where it will consider the proposals put forward by ELEXON.		
<b>Issue:</b>	It has become clear that there are a number of issues and ambiguities relating to the complex site arrangements, which this issue seeks to address.  ELEXON believes that, as a result of the current lack of clarity, different Suppliers and Supplier Agents are likely to be operating with different interpretations of what is permitted under the complex site arrangements. This has the potential to create distortions in the supply market, with certain customers potentially incentivised to take their supply from a Supplier with an interpretation of the rules that favours their own situation.		
<b>History:</b>	Issue 88 was raised on 18 March 2020 by ELEXON.		

<b>Issue 89: Ensuring Demand Control Event (DCE) procedures remain fit for purpose</b>		<b>No Update</b>	
<b>Date Raised:</b>	23 March 2020	<b>Proposer:</b>	ELEXON
<b>Latest Update:</b>	The first Issue Group meeting was held on 22 April 2020. The meeting looked to determine the key difficulties experienced whilst performing the Settlement Adjustment Processes, and to establish the questions		



	<p>the group wanted to ask Industry in a formal Request for Information. The necessary questions have been included in the RFI, which was circulated for 15 WD with responses due by the 6 May 2020.</p>
<b>Next Event:</b>	<p>The outcomes of the RFI will be considered at the next meeting on 29 June 2020.</p>
<b>Issue:</b>	<p>This Issue seeks to examine efficacy of the Settlement Adjustment Processes (SAP) introduced by P305 'Electricity Significant Code Review Developments' in 2015. The intent of the SAP is to amend participants' imbalance positions following a DCE.</p> <p>The SAP were used for the first time following the DCE on 9 August 2019 and the majority of positions have been adjusted accordingly. However, difficulties were faced and this Issue will in part act as a lessons learned exercise for the SAP and seek potential improvements and efficiencies.</p> <p>Additionally, questions were raised by the BSC Panel as to whether the costs of running the processes were commensurate with the benefits of doing so. As such, the Panel raised P397 'Assessing the costs and benefits of adjusting Parties' Imbalances following a demand disconnection' as a means to introduce a materiality threshold wherein the processes are only performed where the estimated benefits outweigh the expected costs.</p> <p>On 3 March 2020, Ofgem sent back P397 citing a lack of evidence in regards to the costs of operating the processes, noting this was not fully available at the time. As well as performing a lessons learned exercise, over the course of this Issue Group we aim to gather that information.</p>
<b>History:</b>	<p>Issue 89 was raised on 23 March 2020 by ELEXON.</p>

<b>Issue 90: Could Elexon (under BSCco) administrate a tendered Market Maker (tMM)?</b>		<b>Update</b>	
<b>Date Raised:</b>	5 May 2020	<b>Proposer:</b>	Infinis Energy
<b>Latest Update:</b>	Issue 90 was raised on 5 May 2020. Arranging the first meeting was delayed due to the cyber-attack on ELEXON's internal systems.		
<b>Next Event:</b>	The first Issue group will be held on 13 July 2020.		
<b>Issue:</b>	This issue group intends to review the case for ELEXON, as BSCCo, administrating a tendered Market Maker (tMM) on behalf of the market and, if ELEXON could tender, what sort of service market participants would want a tMM to provide. It is also an opportunity to discuss if ELEXON is not the right party to run a tender for, and administer, a MM, who else could be considered to undertake this role if required.		
<b>History:</b>	Issue 90 was raised on 5 May 2020.		



## 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> RC: 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>D:</b> Delayed due to COVID-19	<b>CBA:</b> Cost/Benefit Analysis
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Mod	Title	Proposer	Date	Urgent
P332	Revisions to the Supplier Hub Principle	Smartest Energy	28 Jan 16	No
P371	Inclusion of non-BM Fast Reserve actions into the Imbalance Price calculation	UK Power Reserve	11 Sep 2018	No
P375	Settlement of Secondary BM Units using metering behind the site Boundary Point	Flexitricity	10 Dec 2018	No
P376	Utilising a Baseline Methodology to set Physical Notifications for Settlement of Applicable Balancing Services	Enel Trade S.P.A.	11 Dec 2018	No
P379	Multiple Suppliers through Meter Splitting	New Anglia Energy	3 January 2019	No

May	June	July	Aug	Sept	Oct
	D	D	APC	AR	DMR
AI	I				
D	D	APC			AR
D	D	APC		AR	DMR
				CBA	



Mod	Title	Proposer	Date	Urgent
<b>P390</b>	Allowing extensions to ELEXON's business and activities, subject to additional conditions	E.ON	12 August 2019	No
<b>P395</b>	Excluding generators from calculation of EMR Supplier Charges	Centrica	7 November 2019	No
<b>P396</b>	Revised treatment of BSC Charges for Lead Parties of Interconnector BM Units'	Nord Pool AS	10 December 2019	No
<b>P398</b>	Improving access to Open Data	BSC Panel	12 December 2019	No
<b>P399</b>	Making the identity of Balancing Service providers visible in the Balancing	Sutton Bridge Power	24 December 2019	No
<b>P402</b>	Enabling reform of residual network charging as directed by the Targeted Charging	National Grid ESO	5 March 2020.	No

Apr	May	June	July	Aug	Sept	Oct
AR	DMR/FMR			WA		
					APC	AR
AI	AI	AI	AI	AI	AI	AI
	APC	AR	RPC DMR FMR	RPC DMR FMR	WA	WA
		APC			AR	RPC DMR FMR
			APC		AR	DMR/FMR



Mod	Title	Proposer	Date	Urgent
<b>P407</b>	Project MARI	National Grid ESO	4 May 2020	No
<b>P408</b>	Simplifying the Output Usable Data Process	National Grid ESO	5 May 2020	No
<b>P409</b>	Aligning BMRS Reporting Requirements with the Clean Energy Package	National Grid ESO	12 May 2020	No

Apr	May	June	July	Aug	Sept	Oct
	IWA					APC
	IWA	RPC	DMR FMR			
		IWA RPC	DMR FMR			



## Progress 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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CP	Title	Proposer	Date Raised	Mar	Apr	May	June	July	Aug
CP1527	Increase the minimum data storage capacity for Settlement Outstations and mandate specific selectable integration periods for Metering Codes of Practice	ELEXON	28 January 2020	PP CPC	CPC	AR	AI	AI	AI
CP1528	CoP4 clarification of BSC Party responsibility for Commissioning of measurement transformers that the BSC Party adopts	ELEXON	28 January 2020	PP CPC	CPC	AR	AI	AI	AI
CP1529	Earlier initiation of Supplier Agreed Meter Readings process	ELEXON	6 May 2020			CPC		AR	AI



## BSC Systems Road Map

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

November 2020 BSC Release - 20 November 2020			
Change Number	Title of Change	BSC Central Systems/Document only impacts	Ofgem/BSC Panel/Panel Committee Approval Status
CP1528	Clarifying responsibility for the Commissioning of measurement transformers that will be later adopted	Document	Confirmed
P396	Revised treatment of BSC Charges for Lead Parties of Interconnector BM Units	System	Confirmed
P408	Simplifying the Output Usable Data Process	System	Pending
P409	Aligning BMRS Reporting Requirements with the Clean Energy Package	Document	Pending

June 2021 BSC Release - 29 June 2021			
Change Number	Title of Change	BSC Central Systems/Document only impacts	Ofgem/BSC Panel/Panel Committee Approval Status
P404	Moving the Self Assessment Document and associated documents from BSCP537 and making them a Category 3 BSC Configurable Item	Document	Confirmed

Ad-Hoc Release			
Change Number	Title of Change	BSC Central Systems/Document only impacts	Implementation date
P397	Assessing the costs and benefits of adjusting Parties' Imbalances following a demand disconnection	Document	5 WD following Authority decision
P383	Enhanced reporting of demand data to the NETSO to facilitate CUSC Modifications CMP280 and CMP281	System	01 Apr 21



TBC Release Date			
Change Number	Title of Change	BSC Central Systems/Document only impacts	Target Implementation Date
P332	Revisions to the Supplier Hub Principle	Document	ASAP
P376	Utilising a baselining methodology as an alternative to Physical Notifications	System	post TERRE
P379	Enabling consumers to buy and sell electricity from/to multiple providers through Meter Splitting	System	November 2022
P375	Settlement of Secondary BM Units using metering at the asset	System	TBC following Modification assessment
P390	Allowing extensions to ELEXON's business and activities, subject to additional conditions'	Document	5WDs after Authority Decision
P399	BSAD Data Change – C16 Statement - Addition of counterparty identification data to existing Balancing Services Adjustment Action notification	System	27 February 2021
P398	Increasing access to BSC Data	Document	TBC
P395	Excluding generators from BM Unit Gross Demand and the calculation of EMR Supplier Charges	System	TBC (targeted to coincide with P375)
P407	Project MARI	System	By July 2022
P402	TCR SCR - implementing Ofgem's policy decision	System	April 2022



# Modification Trend Chart





