

306/03 BSC Change Report: September 2020

Summary of Open Changes

Total open changes*:

- Modifications – 17
- Change Proposals – 10
- Issues – 6

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:

- CP1537

Assessment Procedure

- Next Workgroups: , P402-4 September, P399- 18 September, P407 – early September, P410 – September, P376 – September, P375-late September, P398- later September, P332 – late September, Issue 89 - 26 August, Issue 87 – 18 September, Issue 88 - late Oct
- Assessment Consultations: P375 – August/September, P376 –September, P398 August/September, P399 – August/September, P402 - August
- Assessment reports: CP1531, CP1532, CP1533, CP1534, CP1535
- CPC batch: CP1536

Report Phase

- RPC: none
- DMR: none

Awaiting decision

- Authority: P390, P397
- Self-Governance: none

Awaiting implementation

- Nov 20: P396, P409, P411, CP1528, CP1529
- Dec 20: P408
- Apr 20: P383, CP1535
- June 22: CP1527

Note: This report was accurate as of 26 August 2020.

*inclusive of both changes progressing through the BSC Change pipeline, and changes approved pending implementation.

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. The Panel reviewed this approach on 13 August 2020 and agreed to continue the prioritisation and review again on 15 October 2020, in line with the time that it expects other performance techniques overseen by the Performance Assurance Board (PAB) to reconvene.

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 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 new changes 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.



COVID-19: Modification 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
P410 'European Imbalance Harmonisation'		X		▲ Continue
P411 'Qualification for new LDSOs'			X	▲ Continue

COVID-19: Impacts on Modification

Key	Initial Written Assessment:	Assessment Procedure: AR: Assessment Report APC: Assessment Procedure Consultation	Report Phase: RC: Report Phase Consultation DMR: Draft Modification Report FMR: Final Modification Report	I: Implementation	D: Delayed due to COVID- 19	CBA: Cost/Benefit Analysis
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	May 20	Jun 20	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20
P332						AR	DMR	
P375						AR		DMR
P376							AR	
P379					CBA		AR	DMR
P395						AR	DMR	
P398						AR	DMR	
P399						AR	DMR	
P402					APC AR	DMR	AR	DMR
P407	IWA							
P410			IWA	DMR	AI	AI	I	



Modification Updates – up until decision

P332: Revisions to the Supplier Hub Principle			Update
Date Raised:	28 January 2016	Proposer:	Smartest Energy
Target Implementation Date:	Post 2020	Current Status:	Assessment Procedure
Latest Update:	<p>The Assessment Consultation has been moved from June 20 to September 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>		
Next Event:	<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 at the end of September.</p>		
Recommendation:	<p>We are seeking a three-month extension to the P332 Assessment Procedure and are proposing to present the Assessment Report at the January 2021 Panel meeting or earlier if possible. The Workgroup due to be held in August has been rescheduled to September 2020 because of Proposer and Workgroup members' availability.</p>		
Issue:	<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>		
Current Solution:	<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>		
History:	<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 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p> <p>The seventh Workgroup meeting was held on 6 February 2020. The workgroup reviewed case studies provided by members and concluded</p>
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	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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P375: Settlement of Secondary BM Units using metering behind the site Boundary Point			Update
Date Raised:	10 December 2018	Proposer:	Flexitricity
Target Implementation Date:	24 February 2022	Current Status:	Assessment Procedure
Latest Update:	The Assessment Phase consultation was issued on 24 August 2020 with responses due by the 14 September 2020. The development took longer than expected due to complexities in the drafting process, however, we are now confident that the solution will fully deliver the intent of the Modification. During the consultation we are engaging with industry press and will host an industry Q&A drop-in session.		
Next Event:	The Assessment Phase consultation will close on 14 September 2020. The next Workgroup is planned for late September where the consultation responses will be reviewed and the final Workgroup recommendations will be made to the Panel at its meeting on 8 October 2020.		
Issue:	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.		
Current Solution:	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).
History:	<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</p>



	<p>tweaks being made once the component parts were reviewed in entirety.</p> <p>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. The legal text was finalised and the Assessment phase consultation issued on 24 August 2020.</p>
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<u>P376</u>: Utilising a Baselining Methodology to set Physical Notifications for Settlement of Applicable Balancing Services			Update
Date Raised:	11 December 2018	Proposer:	Enel Trade S.P.A.
Target Implementation Date:	TBC	Current Status:	Assessment Procedure
Latest Update:	We have issued the P376 Business requirements to our service providers to understand the BSC central system impacts of the proposed solution. This has been returned and we are considering the Assessment in preparation to walk the Workgroup through potential impacts.		
Next Event:	The Workgroup will meet in September to consider the impacts and prepare its Assessment Procedure Consultation to be issued in the September-October 2020 period.		
Issue:	<p>Exelon 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.</p> <p>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'.</p> <p>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.</p>		
Current Solution:	This Modification proposes to allow the Final Physical Notification which feeds into the Settlement of Trading Charges to be created via a Baselining Methodology. This Modification builds on the work of Issue 71.		



History:	<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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<u>P379:</u> Multiple Suppliers through Meter Splitting			Update
Date Raised:	3 January 2019	Proposer:	GridBeyond
Target Implementation Date:	November 2022 (subject to impact assessment)	Current Status:	Assessment Procedure
Latest Update:	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		

	<p>a significant impact on Parties, particularly Suppliers, Data Collectors and parties looking to become secondary Suppliers.</p> <p>Bidder selection is currently taking place after the third party Cost-Benefit Analysis proposals were independently scored.</p>
Next Event:	<p>We anticipate the contract to provide Cost-Benefit Analysis to be awarded September 2020.</p>
Issue:	<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>
Current Solution:	<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>
History:	<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"> • To clarify the P379 issue and scope; • To discuss Workgroup views and feedback on use cases 1 (Electric Vehicle) and 2 (Exempt supply);and



	<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 at the Boundary Point. Further P375 updates will be provided to the P379 Workgroup.</p> <p>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.</p> <p>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.</p> <p>The P379 meeting (WG9) was held on 24 September 2019. At the meeting Ofgem presented on Key design considerations. The</p>
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	<p>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.</p> <p>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.</p> <p>The last P379 meeting (WG11) was held on 3 February 2020. The purpose of the meeting was to review the P379 Business Requirements.</p> <p>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> <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> <p>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</p>
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	<p>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> <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> <p>We issued requests for proposals to five third parties to provide the Cost Benefit Analysis.</p> <p>Proposals were due to be returned by bidders by 12 August 2020.</p>
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P390: Allowing extensions to Elexon’s business and activities, subject to additional conditions			Update
Date Raised:	12 August 2019	Proposer:	E.ON
Target Implementation Date:	5 Working Days after Authority decision	Current Status:	Report Phase
Latest Update:	The Draft Modification Report was presented to the Panel at its 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. At the August 2020 Panel meeting, Ofgem indicated a Decision on P390 may be forthcoming early September 2020.		
Next Event:	Ofgem will determine whether to approve or reject P390.		
Issue:	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. 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.		
Current Solution:	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.		



History:	<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 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. 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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<u>P395: Excluding generators from BM Unit Gross Demand and the calculation of EMR Supplier Charges</u>			Update
Date Raised:	7 November 2019	Proposer:	Centrica
Target Implementation Date:	TBC	Current Status:	Assessment Procedure
Latest Update:	Further to Covid prioritisation, and 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. Given the complexity of the Modification and dependencies on P375 and P379, which are still in assessment, we believe that five more industry Workgroups are necessary, including industry and service provider consultations, to adequately develop the solution and assess its impacts on BSCCo and the wider industry.		
Next Event:	Progression on P395 is due to begin again in September.		
Recommendation:	We request an eight month extension to the P395 Assessment Procedure, returning with the Assessment Report to the May 2021 Panel meeting.		
Issue:	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.		
Current Solution:	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.		
History:	<p>P395 was raised by Centrica on 7 November 2019. The Panel considered the IWA on 14 November 2019 and agreed to advance the 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</p>		



	the solution is truly enduring, consistent with regulations and scalable to domestic level. 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.
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<u>P397:</u> Assessing the costs and benefits of adjusting Parties’ Imbalances following a demand disconnection			Update
Date Raised:	7 November 2019	Proposer:	BSC Panel
Target Implementation Date:	5WD following Authority approval.	Current Status:	Report Phase
Latest Update:	At its meeting on 9 July 2020, the Panel agreed to amend the P397 solution in line with the outcomes of the RFI and industry was re-consulted. The responses to the consultation were presented to the Panel at its meeting on 13 August and the FMR was subsequently sent to Ofgem on 14 August 2020.		
Next Event:	With Ofgem for decision.		
Issue:	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.		
Current Solution:	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 outweigh the costs.		
History:	<p>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 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> <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</p>		

	Panel on 12 March 2020, detailing its approach to gathering the required information. The Panel approved the proposed timeline, which included the amended P397 Final Modification Report to be presented to the Panel at its meeting on 09 July 2020.
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<u>P398: Increasing access to BSC Data</u>			Update
Date Raised:	12 December 2019	Proposer:	BSC Panel
Target Implementation Date:	TBC	Current Status:	Assessment Procedure
Latest Update:	The P398 Assessment Phase consultation was issued on 24 August and responses are requested by 14 September 2020.		
Next Event:	There will be a Workgroup meeting in September to discuss consultation responses and make final recommendations from the Workgroup to the BSC Panel at its meeting on 8 October 2020.		
Issue:	<p>In June 2019 the Energy Data Task Force (EDTF) published its report 'A Strategy for a Modern Digitalised Energy System'. 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>		
Current Solution:	<p>P398 proposes amending the BSC so that all data is assumed open unless there is a reason otherwise. The BSC will be amended to require the Panel to establish the BCB and for the BCB to have responsibility for publishing data. The detailed responsibilities will be captured in a new Cat3 document.</p> <p>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>		
History:	<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 and follow-up work from the previous Workgroups that is taking longer than expected. A further extension to October 2020 was granted to recognise the delay, and consequential impact caused by the cyber-attack and re-prioritisations.</p>		



P399: Making the identity of Balancing Service providers visible in the Balancing Services Adjustment Data			Update
Date Raised:	24 December 2019	Proposer:	Sutton Bridge Power Generation
Target Implementation Date:	TBC (to be confirmed through Modification Assessment)	Current Status:	Assessment Procedure
Latest Update:	. The P399 Assessment Procedure Consultation was issued for 15 WD on 17 August 2020 with responses due by 8 September.		
Next Event:	The P399 Assessment Procedure consultation will close on Tuesday 8 September. The responses will be considered by the Workgroup at its final meeting on 18 September. The Assessment Report will then be presented to the Panel at its meeting on 8 October, followed by a one month Report Phase consultation due to EBGL impacts.		
Issue:	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.		
Current Solution:	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 NGESO to identify the best way to provide this data for publication on BMRS.		
History:	<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 NGESO to conduct a further impact assessment.</p> <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.</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 NGESO committed to completing the</p>		

	<p>relevant Impact Assessments and to provide a timeline as to how quickly this would be completed. The outcomes of this IA were presented at the third P399 WG meeting on 17 July 2020. NGESO's revised impact assessment was presented to the WG at its meeting on 17 July 2020. The WG agreed a solution and to consult industry for 15WDs during August. There was a narrow window to hold the last Workgroup meeting following the consultation, but it has not been possible to get a quorate Workgroup</p>
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P402 : Enabling reform of residual network charging as directed by the Targeted Charging Review			Update
Date Raised:	5 March 2020	Proposer:	NGESO
Target Implementation Date:	1 April 2022	Current Status:	Assessment Procedure
Latest Update:	<p>As per Elexon's communication concerning the impact of COVID-19, 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 third Workgroup took place on 5 August 2020. The group discussed how P402 has a soft dependency for the related CUSC modifications – they will rely on a solution that provides NETSO with data for billing and tariff setting being implemented by April 2022 - but agreed that whilst P402 enables the TNUOS TCR arrangements, it doesn't implement any of the core requirements of Ofgem's TCR SCR.</p>		
Next Event:	<p>P402 is currently being impact assessed by our Service Provider with business requirements being finalised and legal text drafted with a view to issuing the Assessment Procedure Consultation September 2020.</p>		
Issue:	<p>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.</p>		
Current Solution:	<p>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.</p>		
History:	<p>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</p>		

	<p>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. The second P402 Workgroup meeting took place on 6 May to consider alternative approaches to P402.</p>
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P407: Project MARI			Update
Date Raised:	4 May 2020	Proposer:	NGESO
Target Implementation Date:	By July 2020	Current Status:	Assessment Procedure
Latest Update:	The third Workgroup planned for 21 July was postponed in order to ensure answers could be provided for all the questioned raised at the previous Workgroup. Instead the workgroup took place on 20 August 2020. The fourth workgroup took place soon after on the 26 August 2020. Both Workgroups discussed Dispatch and Settlement processes.		
Next Event:	Fifth Workgroup is planned for the period 4 - 11 September 2020. This Workgroup will discuss Reporting and Performance Assurance. Impact Assessment and consultation are due to follow this Workgroup.		
Issue:	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.		
Current Solution:	P407, along with the NGESO changes, will enable GB participants to participate in MARI.		
History:	<p>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.</p> <p>The Panel determined that P407 should progress to the Assessment Procedure at its meeting on 14 May 2020.</p> <p>National Grid Electricity System Operator raised P407 'Project MARI' on 4 May 2020.</p> <p>The second Workgroup was held 7 July 2020 and covered Bid Submission and Acceptance. The purpose of the meeting was to</p>		

	consider outcomes of actions from Workgroup meeting 1 and to assess the submission and acceptance options for P407/GC0145 and agree the way forward. A number of questions were asked about the detail of NGESO's solution which were taken away with a view to bring answers to the next Workgroup.
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P408: Simplifying the Output Usable Data Process			Update
Date Raised:	5 May 2020	Proposer:	NGESO
Target Implementation Date:	3 December 2020	Current Status:	Awaiting Implementation
Latest Update:	The Draft Modification Report was presented to the BSC panel at its meeting on 9 July 2020, with the Panel unanimously agreeing to approve the Modification under Self-Governance. BSC Parties had 15 Working Days (from 10 July 2020) to appeal the Panel's approval of P408. The 15 Working Day period expired on 31 July 2020 with no appeals received.		
Next Event:	P408 will be implemented on 3 December 2020.		
Issue:	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.		
Current Solution:	To publish the amended Output Usable, Margin and Surplus data from GC0130 on BMRS.		
History:	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.		

P410: Changing imbalance price calculations to comply with the Imbalance Settlement Harmonisation regulations			Update
Date Raised:	3 July 2020	Proposer:	NGESO
Target Implementation Date:	4 November 2021	Current Status:	Assessment Procedure
Latest Update:	The first Workgroup was held on 6 August where the Workgroup agreed principles for calculating a Value of Avoided Activation.		
Next Event:	Elexon is undertaking analysis into the impact this will have in pricing mechanisms. We are also working with the proposer to further develop the P410 solution to account for Workgroup comments. We are planning to hold another workgroup late September for the Workgroup to consider this.		



Issue:	P410 will introduce changes to the imbalance price calculations to ensure BSC compliance with the European Imbalance Settlement Harmonisation regulations.
Current Solution:	P410 will replace the Market Index Price in the Imbalance Calculation with a new Value of Avoided Activation of balancing energy as required by the ISHP.
History:	NGESO raised P410 on 3 July 2020. The Panel considered the IWA at its meeting on 9 July and agreed to progress P410 to the Assessment Procedure.

<u>P411</u>: Including new LDSOs in Qualification to mitigate potential risks to Settlement			Update
Date Raised:	9 July 2020	Proposer:	BSC Panel
Target Implementation Date:	5 November 2020	Current Status:	Awaiting Implementation
Latest Update:	The Panel considered the Draft Modification Report at its meeting on 13 August where the Panel approved P410 for implementation on 5 November 2020 as a Self-Governance Modification. The Self Governance Appeal window will close on 4 September 2020.		
Next Event:	P411 will be implemented on 5 November 2020, subject to no appeals being received.		
Issue:	Licensed Distribution System Operators (LDSOs) have numerous responsibilities under the BSC. Many of these responsibilities have a material effect on factors linked to Settlement Risks. Once operational, LDSOs are subject to Performance Assurance Techniques, such as the BSC Audit and Error and Failure Resolution, which provide ongoing assurance that LDSOs are able to fulfil their BSC role and obligations. However, LDSOs are not subject to any preventative assurance for these activities before they enter the market and go live.		
Current Solution:	This Modification proposes to include new entrant LDSOs in the scope of the Qualification technique in the role of LDSO.		
History:	The BSC Panel raised P411 at its meeting on 9 July 2020 and agreed to submit P411 direct to the Report Phase. The Report Phase Consultation was issued on 14 July with responses due by 29 July 2020.		



Change Proposal Updates – up until decision

CP1530: Introduction of a formalised process for the validation of measurement transformer ratios by Elexon			Update
Date Raised:	30 June 2020.	Proposer:	Elexon
Target Implementation Date:	25 February 2021	Current Status:	Change Proposal Circular Consultation
Latest Update:	The CP1530 Assessment Report will be presented to the SVG at its meeting on 1 September 2020. As a result of the responses we received to the CP1530 consultation, there are a number of material changes and clarifications needed to the CP1530 solution.		
Next Event:	Elexon will recommend to the SVG, at its meeting on 1 September that CP1530 be issued for a second consultation on the 7 September, with a response deadline of the 6 October.		
Issue:	Licensed Distribution System Operators (LDSOs) currently submit transformer ratios for measurement transformers as free text, where any value can be entered. There is currently no list of valid transformer ratios or a process for the validation of the transformer ratios submitted by LDSOs. This can at times lead to erroneous data being entered which will manifest itself as erroneous Settlement data.		
Current Solution:	CP1530 will create a valid list of transformer ratios and introduce a process, documented in Balancing and Settlement Code Procedure (BSCP) 515 'Licensed Distribution', where LDSOs submit transformer ratios to Elexon. On receipt, Elexon will check that the submitted ratios meet the valid format and establish a list of valid transformer ratios, to be used by LDSOs, on the Elexon Portal. A corresponding change to the Master Registration Agreement (MRA), which requires all registrations of metering systems to use a ratio selected from the valid set published on the Elexon Portal, has been raised: DTC CP 3576 – Introduction of Valid Sets for J0454 (CT Ratio) and J0455 (VT Ratio.)		
History:	CP1530 was raised by Elexon on 30 June 2020. The CP1530 Progression Paper was presented to the Supplier Volume Allocation Group (SVG) at its meeting on 7 July 2020. The SVG noted CP1530 had been raised and the proposed progression timetable. CP1530 was issued for industry consultation on 14 July 2020 with responses due by Monday 10 August.		

CP1531: Additionally provide the TUoS Report to National Grid ESO at the II Settlement Run			Update
Date Raised:	30 June 2020	Proposer:	National Grid ESO
Target Implementation Date:	1 April 2021	Current Status:	Committee Decision



Latest Update:	CP1531 was included in Change Proposal Circular Consultation CPC00805 on Tuesday 14 July 2020 with responses invited by 5pm on Monday 10 August 2020. There were no consultation responses received.
Next Event:	The CP1531 Assessment Report will be presented to the SVG at its meeting on 1 September 2020 for decision.
Issue:	National Grid ESO requires the Balancing and Settlement Code Company (BSCCo) to provide the Transmission Use of System (TUoS) Report at the II (Interim Information) Settlement Run to ensure they can continue to provide an indicative view of Balancing Services Use of System (BSUoS) charges to liable parties after the introduction of a proposed change to the charging methodology.
Current Solution:	The BSCCo shall generate and publish the existing P0210 TUoS Report (HH/NHH Split) at the II Settlement Run (currently only Settlement Runs SF onwards), make it available on the Elexon Portal, and deliver to National Grid ESO via file transfer. The TUoS Report is already generated and published for subsequent Settlement Runs as it is needed for the calculation of Transmission Network Use of System (TNUoS) charges.
History:	CP1531 was raised by National Grid ESO on 30 June 2020 and the CP1531 Progression Paper was presented to the SVG at its meeting on 7 July 2020.

<u>CP1532: ‘Reduce Half Hourly Change of Supplier timelines to meet the Initial Settlement Run’</u>			Update
Date Raised:	8 July 2020.	Proposer:	Elexon
Target Implementation Date:	25 February 2021	Current Status:	Committee Decision
Latest Update:	CP1532 was included in Change Proposal Circular Consultation CPC00805 on Tuesday 14 July 2020 with responses invited by 5pm on Monday 10 August 2020. There were ten respondents to the Change Proposal Consultation from market roles including Suppliers, Supplier Agents and a Distributor. Eight of the ten respondents agreed with the proposed solution, with seven respondents noting they would be impacted and incur costs.		
Next Event:	The CP1532 Assessment Report will be presented to the SVG at its meeting on 1 September 2020.		
Issue:	<p>It is not currently possible for HH Supplier Agents to complete Change of Supplier (CoS) activities by the Initial Settlement Run, if the CoS process is initiated two WDs ahead of the Supply Start Date (SSD) and if Suppliers and their Agents use the maximum lead times available within the relevant BSCPs.</p> <p>If Suppliers and Agents use the maximum lead time available to them, this could result in estimated data entering Settlement, due to the subsequent Agent appointment and data transfer processes not completing in time to provide actual data in the Initial Settlement Run.</p>		

	Updating and clarifying the timelines around the CoS process within these BSCPs will align with the objectives of the REC and Switching SCR in 2021 and ensure that the HH CoS process, in particular, will complete by the SF Run, by design rather than good practice.
Current Solution:	CP1532 intends to update CoS timescales within BSCP502, BSCP504 and BSCP514 to ensure that all activities can be completed by the Initial Settlement Run (SF). It will also align appointment and de-appointment timescales (in both the NHH and HH processes) with the expected changes introduced to facilitate the Switching programme.
History:	CP1532 was raised by Elexon on 8 July 2020. The Change Proposal has been raised on the back of Issue 86 'Review of processes potentially impacted by Ofgem's Faster Switching Programme' CP1532 was included in Change Proposal Circular Consultation CPC00805 on the 14 July 2020 with responses received by Monday 10 August.

CP1533: Mandatory Sending of D0052 for DCC serviced SVA NHH Metering Systems			Update
Date Raised:	8 July 2020.	Proposer:	Elexon
Target Implementation Date:	25 February 2021	Current Status:	Committee Decision
Latest Update:	CP1533 was included in Change Proposal Circular Consultation CPC00805 on Tuesday 14 July 2020 with responses invited by 5pm on Monday 10 August 2020. Five responses were received from Suppliers and Supplier Agents, all respondents agreed with the CP and implementation date. Two participants identified costs to implement CP1533 and four of the respondents identified they would be impacted.		
Next Event:	The CP1533 Assessment Report will be presented to the SVG at its meeting on 1 September 2020.		
Issue:	<p>P302 'Improve the Change of Supplier Meter read and Settlement process for smart Meters' introduced clause 3.2.6.50 in BSCP504, which requires the new Supplier to send a D0052 'Affirmation of Metering System Settlement Details' flow with a "new" Standard Settlement Configuration (SSC) and "new" Profile Class (PC) to its new Non Half Hourly Data Collector (NHHDC), following the receipt of the Meter Technical Details (MTDs) from the new Meter Operator Agent (MOA).</p> <p>The Issue 86 Workgroup identified that this process was not being followed by all participants, identifying the wording 'new' implies an optional dataflow, which will only be sent if a Supplier re-configures the smart meter as part of the switch. However, the original intention was the D0052 is required to be sent in all CoS events.</p>		



Current Solution:	CP1533 intends to update clause 3.2.6.50 in BSCP504 to remove instances of the word “new” in order to make it clear that D0052s shall be sent in all instances.
History:	CP1533 was raised by Elexon on 8 July 2020. The Change Proposal has been raised on the back of Issue 86 ‘Review of processes potentially impacted by Ofgem’s Faster Switching Programme’ CP1533 was included in Change Proposal Circular Consultation CPC00805 on the 14 July 2020 with responses received by Monday 10 August.

CP1534: Introduce Change of Supplier (CoS) - No Meter Process			Update
Date Raised:	8 July 2020.	Proposer:	Elexon
Target Implementation Date:	25 February 2021	Current Status:	Committee Decision
Latest Update:	CP1534 was included in Change Proposal Circular Consultation CPC00805 on Tuesday 14 July 2020 with responses invited by 5pm on Monday 10 August 2020. There were nine respondents to the CP consultation, from Market Roles including Suppliers, Supplier Agents and a Distributor. All nine respondents agreed with the CP, six identified impacts with five identifying costs.		
Next Event:	The CP1534 Assessment Report will be presented to the SVG at its meeting on 1 September 2020.		
Issue:	<p>Currently the Supplier Meter Registration Agent (SMRA) allows registrations to be deleted if no Meter has been installed on a Metering Point. This process removes the original Supplier’s registration so that a second Supplier can treat the site as a new connection (rather than a Change of Supplier (CoS)) and arrange for the Meter Operator (MOA) to install a Meter. This functionality will not be available within the Central Switching Service (CSS) which is due to go-live in Summer 2021 (subject to any re-planning as a result of the COVID-19 pandemic).</p> <p>The CoS process, where there is no Metering Equipment at site, is not explicitly defined within the relevant BSCPs. Suppliers and Supplier Agents follow the existing CoS processes, which includes requesting Meter Read History (MRH) that is not available due to the lack of Metering Equipment on site.</p> <p>Following the introduction of the CSS, this process will become more prevalent and affect Suppliers, Meter Operator Agents (MOA), Half Hourly Data Collectors (HHDC) and Non Half Hourly Data Collectors (NHHDC).</p>		
Current Solution:	CP1534 intend to create a new ‘Change of Supplier (CoS) No Meter’ process within BSCP502, BSCP504 and BSCP514. The new processes will instruct Suppliers, Data Collectors (DCs) and MOAs on which dataflows to send if there is no Metering Equipment on site.		



History:	CP1534 was raised by Elexon on 8 July 2020. The Change Proposal has been raised on the back of Issue 86 'Review of processes potentially impacted by Ofgem's Faster Switching Programme' CP1534 was included in Change Proposal Circular Consultation CPC00805 on the 14 July 2020 with responses received by Monday 10 August.
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CP1535: Interconnector Fuel Type Category update to BMRS			Update
Date Raised:	13 July 2020	Proposer:	National Grid ESO
Target Implementation Date:	1 April 2021	Current Status:	Awaiting Implementation
Latest Update:	The CP1535 Assessment Report was presented to the BSC Panel for decision at its meeting on 13 August 2020. The BSC Panel unanimously approved CP1535 to be implemented on 1 April 2020, as part of a standalone BSC Release.		
Next Event:	CP1535 will be implemented on 1 April 2021.		
Issue:	<p>The North Sea Link (NSL) Interconnector is currently under construction and due to be commissioned in 2021. The BSC requires a separate 'Fuel Type Category' to be defined for each Interconnector for reporting purposes and also for the Panel to approve all new fuel type categories. Therefore, for the NSL Interconnector data to be published on the BMRS, both BSC central system changes, as well as Panel approval for this new 'Fuel Type Category' are required.</p> <p>CP1516 'New Interconnector Fuel Type Categories: Eleclink & IFA2' implemented an interim solution to incorporate data from IFA2 and ElecLink Interconnectors on the BMRS. This was due to constraints on the BMRS at the time, created by the need to deliver a number of complex changes which all impacted the BMRS (P344, P384, and CP1516) over the same timeframe.</p>		
Current Solution:	CP1535 seeks to Add the North Sea Link (NSL) Interconnector to the BMRS. CP1535 will also enable the withdrawal of the CP1516 interim solution to incorporate data from IFA2 and ElecLink Interconnectors on the BMRS. It will implement the original CP1516 solution and give Market Participant visibility of the disaggregated Interconnector data and make it available through BMRS-hosted graphs, tables and XML / CSV downloads, APIs, Data Push and TIBCO services.		
History:	CP1535 was raised by National Grid ESO on 13 July 2020		

CP1536: Use of DTC data flow D0379 for submission of unmetered Half Hourly data			Update
Date Raised:	27 July 2020	Proposer:	Elexon



Target Implementation Date:	25 February 2021	Current Status:	Change Proposal Circular Consultation
Latest Update:	The CP1536 Progression Paper was presented to the SVG on 4 August 2020 for information. The SVG noted CP1536 had been raised and the proposed progression timetable. CP1536 was issued for industry consultation on 10 August 2020 with responses due by Monday 7 September 2020.		
Next Event:	The CP1536 Assessment report will be presented to the SVG at its meeting on 6 October 2020.		
Issue:	BSCP520 'Unmetered Supplies Registered in SMRS' permits the use of 'Electronic or other agreed method' for the sending of unmetered Half Hourly (HH) data from Meter Administrators (MAs) to Half Hourly Data Collectors (HHDCs) via the Data Transfer Catalogue (DTC) D0003 data flow 'Half Hourly Advances'. However, MAs are not currently able to send D0003 flows across the Data Transfer Network (DTN) to send unmetered HH data, as 'MA' is not specified as a 'Data Transfer Participant' in Annex A of the DTC. As a result, MAs currently send the unmetered HH data to HHDC via email.		
Current Solution:	The proposed CP1536 solution will amend BSCP520 to allow MAs to send unmetered HH data across the DTN using the existing DTC data flow D0379 – Half Hourly Advances UTC		
History:	On 27 July 2020, Elexon raised CP1536 following the recommendation from the Unmetered Supplies User Group (UMSUG) (UMSUG125/02D).		

CP1537: Extending the Timescales for agreeing Technical Assurance of Performance Assurance Parties (TAPAP) Findings Reports			Update
Date Raised:	21 August 2020	Proposer:	Elexon
Target Implementation Date:	25 February 2021	Current Status:	Assessment
Latest Update:	Elexon raised CP1537 on 21 August 2020.		
Next Event:	CP1537 will be presented to the PAB on 27th August 2020, and to the SVG on 1st September 2020		
Issue:	Under Balancing and Settlement Code Procedure (BSCP) 535 section 3.2.6, PAPs have two Working Days (WD) to respond to a TAPAP audit check findings report, either by accepting the findings, or by appealing them. If the PAP appeals the findings, it must provide a reason for the appeal within the same two WD period after receiving the TAPAP results notification. This time frame is insufficient to allow for multiple levels of stakeholder review, and therefore Parties are unable to fully consider the findings of the report nor compose a fully justified and evidenced appeal. This results in an unnecessary burden on the PAP in addition to that caused by COVID-19, industry change, and other code body work.		



Current Solution:	CP1537 proposes to increase the time allowed to respond to a TAPAP findings report from two working days to five working days. It also proposes to clarify the timescale allowed for providing evidence in support of an appeal, providing an additional five working days for this step.
History:	



Issue Updates

Issue 69: Performance Assurance Framework Review			No Update
Date Raised:	30 March 2017	Proposer:	Exelon
Latest Update:	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). Exelon will present the final PAF Review recommendations at the September 2020 PAB meeting.		
Next Event:	There are no more planned Issue 69 Workgroups. The Issue 69 Report will be presented to the BSC Panel at its meeting on 8 October 2020.		
Issue:	Exelon 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 P207 'Introduction of a new governance regime to allow a risk based Performance Assurance Framework (PAF)' 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.		
History:	<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. Exelon 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, Exelon 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, Exelon 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>		



	<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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p> <p>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.</p> <p>The first working group for this work stream took place on 3 October 2018, with subsequent working groups scheduled for roughly every quarter.</p> <p>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>
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	<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 PAB (224/06) 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">• Different approaches to future assurance data provision;
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	<ul style="list-style-type: none"> • 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 • General working practices that Elexon and the Performance Assurance Board (PAB) adopt when using new data sources.
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Issue 83: Ensuring that the Buy Price Adjustment reflects all additional balancing costs incurred by NGESO			Update
Date Raised:	1 July 2019	Proposer:	Sebmcorp UK
Latest Update:	Issue 83 is effectively on hold until December 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.		
Next Event:	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 Regulations into the GB trading arrangements. This is being done by P410 which is required to be implemented no later than December 2021.		
Issue:	<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>		
History:	Issue 83 was raised by Sebmcorp UK on 1 July 2019. 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.		



Issue 86: Review of processes potentially impacted by Ofgem’s Faster Switching Programme.		No Update	
Date Raised:	9 October 2019	Date Raised:	9 October 2019
Latest Update:	Agreed outstanding items have been sent to Ofgem. Ofgem provided feedback on documents submitted as well as a view on how their work is being impacted by Covid-19.		
Next Event:	We are making the necessary changes to the draft redlining to account for Ofgem’s comments ahead of the Retail Code Consolidation Consultation this autumn.		
Issue:	<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>Exelon, 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"> • Data Collectors (DCs) • Data Aggregators (DAs) • Meter Operator Agents (MOAs) • Suppliers 		
History:	<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> <p>Exelon 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.</p>		



Issue 87: Busbar voltage transformer metering for Offshore wind farms under OFTO arrangements			Update
Date Raised:	3 March 2020	Proposer:	Siemens Transmission and Distribution Limited
Latest Update:	The first Issue group meeting took place on 6 July, where the group considered potential solutions to the Issue. The group wish to consider whether the solution may be extended to cover onshore sites, and have requested some clarifications for consideration at the next meeting.		
Next Event:	Elexon are progressing actions and determining the best time to hold the second meeting.		
Issue:	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.		
History:	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. The first meeting was postponed due to a cyber-attack on Elexon's IT systems.		

Issue 88: Clarification of BSC Arrangements relating to Complex Sites			Update
Date Raised:	18 March 2020	Proposer:	Elexon
Latest Update:	The second Issue Group meeting was held on 27 July 2020. Elexon took several actions, including issuing a Request for Information (RFI) to industry to get a clearer picture of the current complex site portfolio in GB and the drafting of a new guidance document. The best time to issue the RFI is being considered, and the third Issue 88 meeting will be held following its completion.		
Next Event:	An RFI will be circulated to industry on 7 September for 15WD and the next Issue Group meeting in late October.		
Issue:	<p>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.</p> <p>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</p>		



	supply from a Supplier with an interpretation of the rules that favours their own situation.
History:	Issue 88 was raised on 18 March 2020 by Elexon. 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.

Issue 89: Ensuring Demand Control Event (DCE) procedures remain fit for purpose			Update
Date Raised:	23 March 2020	Proposer:	Elexon
Latest Update:	The third Issue 89 meeting was held on 26 August and members agreed to recommend process improvements to the Settlement Adjustment Processes as a result of this Issue.		
Next Event:	The Issue Report will be tabled at the Panel’s October meeting.		
Issue:	<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>		
History:	Issue 89 was raised on 23 March 2020 by Elexon. 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 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. The third meeting for Issue 89 was held on 26 August.
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Issue 90: Could Elexon (under BSCCo) administrate a tendered Market Maker (tMM)?			Update
Date Raised:	5 May 2020	Proposer:	Infinis Energy
Latest Update:	The Issue group concluded that Elexon could run a tender, were well placed to manage third parties delivering such services, and while there would be a lot of details to work through, this was a plausible route to go down in future.		
Next Event:	The Issue Group is now closed.		
Issue:	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.		
History:	Issue 90 was raised on 5 May 2020 and the first Issue group was held on 13 July 2020. The Issue group concluded no additional meetings should be held, and no changes or modifications were raised at this stage.		



Progression of Modifications – up until implementation

<u>Key</u>	<u>Initial Written Assessment:</u>	<u>Assessment Procedure:</u>	<u>Report Phase:</u>	<u>WA:</u> With Authority Awaiting Decision	<u>AI:</u> Awaiting Implementation	<u>I:</u> Implementation	<u>D:</u> Delayed due to COVID-19	<u>CBA:</u> Cost/Benefit Analysis
		AR: Assessment Report APC: Assessment Procedure Consultation	RC: Report Phase Consultation DMR: Draft Modification Report FMR: Final Modification Report					

Mod	Title	Proposer	Date	Urgent
P332	Revisions to the Supplier Hub Principle	Smartest Energy	28 Jan 16	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

June	July	Aug	Sept	Oct	Nov	Dec
D	D	APC	AR	DMR	FMR	
D	APC			AR		
D				APC		
D	D	D	CBA	APC/AR	APC/AR	



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

June	July	Aug	Sept	Oct	Nov	Dec
					WA	
			APC	AR		
				AI	I	
AR	RPC DMR FMR	RPC DMR FMR		WA		
APC				AR	RPC DMR FMR	WA
APC			AR	DMR/FMR	WA	



Mod	Title	Proposer	Date	Urgent
P407	Project MARI	National Grid ESO	4 May 2020	No
P408	Simplifying the Output Usable Data Process	National Grid ESO	5 May 2020	No
P410	Changing imbalance price calculations to comply with the Imbalance Settlement Harmonisation regulations	National Grid ESO	3 July 2020	No
P411	Including new LDSOs in Qualification to mitigate potential risks to Settlement	BSC Panel	9 July 2020	No

June	July	Aug	Sept	Oct	Nov	Dec
				APC	AR	
RPC	DMR FMR	AI	AI	AI		I
	IWA		APC		AR	
	IWA/RPC	DMR FMR	AI	AI	I	



Progress of Change Proposals – up until implementation

Key	Assessment Procedure:	CPC: Change Proposal Circular Consultation	Committee Decision:	AI: Awaiting Implementation	I: Implementation
	PP: Progression Paper		AR: Assessment Report FR: Final CP Report		

CP	Title	Proposer	Date Raised
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
CP1528	CoP4 clarification of BSC Party responsibility for Commissioning of measurement transformers that the BSC Party adopts	Elexon	28 January 2020
CP1529	Earlier initiation of Supplier Agreed Meter Readings process	Elexon	6 May 2020
CP1530	Introduction of a formalised process for the validation of measurement transformer ratios by Elexon	Elexon	30 June 2020

June	July	Aug	Sep	Oct	Nov	Dec
AI	AI	AI	AI	AI	AI	
AI	AI	AI	AI	AI	I	
	AR	AI			I	
	PP	CPC	AR	AI	AI	



CP	Title	Proposer	Date Raised
CP1531	Additionally provide the TUoS Report to National Grid ESO at the II Settlement Run	National Grid ESO	30 June 2020
CP1532	Reduce Half Hourly Change of Supplier timelines to meet the Initial Settlement Run	Elexon	8 July 2020
CP1533	Mandatory Sending of D0052 for DCC serviced SVA NHH Metering Systems	Elexon	8 July 2020.
CP1534	Introduce Change of Supplier (CoS) – No Meter Process	Elexon	8 July 2020.
CP1535	Interconnector Fuel Type Category update to BMRS	Elexon	13 July 2020
CP1536	Use of DTC data flow D0379 for submission of unmetered Half Hourly data	National Grid ESO	27 July 2020

June	July	Aug	Sep	Oct	Nov	Dec
	PP	CPC	AR FR	AI	AI	
	PP	CPC	AR	AI	AI	
	PP	CPC	AR	AI	AI	
	PP	CPC	AR	AI	AI	
	PP	CPC	AR	AI	AI	
		PP	CPC	AR	AI	



BSC Releases Road Map

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

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
P409	Aligning BMRS Reporting Requirements with the Clean Energy Package	Document	Confirmed

February 2021 BSC Release - 25 February 2021			
Change Number	Title of Change	BSC Central Systems/Document only impacts	Ofgem/BSC Panel/Panel Committee Approval Status
CP1532	Reduce Half Hourly Change of Supplier timelines to meet the Initial Settlement Run	Document	Confirmed
CP1533	Mandatory Sending of D0052 for DCC serviced SVA NHH Metering Systems	Document	Confirmed
CP1534	Introduce Change of Supplier (CoS) – No Meter Process	Document	Confirmed
CP1536	Use of DTC data flow D0379 for submission of unmetered Half Hourly data	Document	Confirmed

Ad-Hoc Releases			
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
P408	Simplifying the Output Usable Data Process	System	3 Dec 20



CP1531	Additionally provide the TUoS Report to National Grid ESO at the II Settlement Run	System	01 Apr 21
P390	Allowing extensions to ELEXON's business and activities, subject to additional conditions'	Document	5WDs after Authority Decision
CP1535	Interconnector Fuel Type Category update to BMRS	System	1 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	Post 2020
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 APC proposing 24 February 2022 or 22 June 2022
P399	BSAD Data Change – C16 Statement - Addition of counterparty identification data to existing Balancing Services Adjustment Action notification	System	June/February 2021 BSC Release
P398	Increasing access to BSC Data	Document	TBC, APC proposing 25 February 2021 or 24 June 2021
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





