



## **BSC Change Process**

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# What is the Change process under the BSC?

The BSC Change process can be used to make changes to the BSC arrangements in response to any concerns, problems or defects that Parties and non-BSC Parties, where designated by the Panel, may identify in the current processes. The BSC arrangements consist of:

- The **Balancing and Settlement Code** (BSC), which contains the obligations, requirements and principles that BSC Parties must follow;
- **Code Subsidiary Documents** (CSDs), which support the BSC in detailing the step-by-step processes which must be undertaken in order to meet these obligations; and
- **BSC Systems**, which are used to deliver many aspects of the arrangements.

The BSC Change processes are defined under [BSC Section F: Modification Procedures](#) and BSC Procedure [BSCP40: Change Management](#).

This section will help you to identify which type of Change would be required for any potential changes you may wish to raise. The remainder of this document will explain:

- The different types of Change;
- Who can raise a Change and how;
- The subsequent progression of a Change;
- The timescales involved; and
- How you can get involved with the various processes.

## What are the different types of Change?

There are several processes for progressing Change, depending on the nature of your Change and whether you have a clear solution in mind. The various types of Change and the progression between them are summarised below.

		Will my solution amend the BSC?	
		Yes	No
Do I have a clear solution?	Yes	Modification	CP
	No	Issue	Issue

## Modifications

A Modification is required for any change that would amend the BSC. A Modification will often amend CSDs and/or BSC Systems in addition to the BSC, and these changes are also done as part of the Modification. When raising a Modification, the Proposer will need to put forward a clear solution. However, they will be able to amend their proposed solution at any time until the Modification reaches the Report Phase, as long as it continues to address the identified issue.

A Modification will typically take six to eight months to be progressed to a final decision, and will then take further time to be implemented, depending on the required lead times.

## Change Proposals (CPs)

A Change Proposal (CP) is required to make a change that would only impact CSDs and/or BSC Systems. A CP will provide a single clear solution to the issue, which will be fixed once the CP has been raised and issued for consultation. Redlined changes to impacted documents will also need to be produced, which we will be able to assist the Proposer with.

A CP will typically take around three months to be progressed to a final decision, and will then take further time to be implemented, depending on the required lead times.

## Draft Change Proposals (DCPs) – (remains in BSCP40 but not commonly used)

If a participant wants to make a change that would require a CP, but has multiple possible solutions and is not sure which to progress, they can raise a Draft Change Proposal (DCP). A DCP will be issued for consultation to seek the views of other market participants on the proposed solutions, though the potential redlined changes are not required at this stage. Following this consultation, the Proposer can then decide which solution (if any) would be best to progress as a CP.

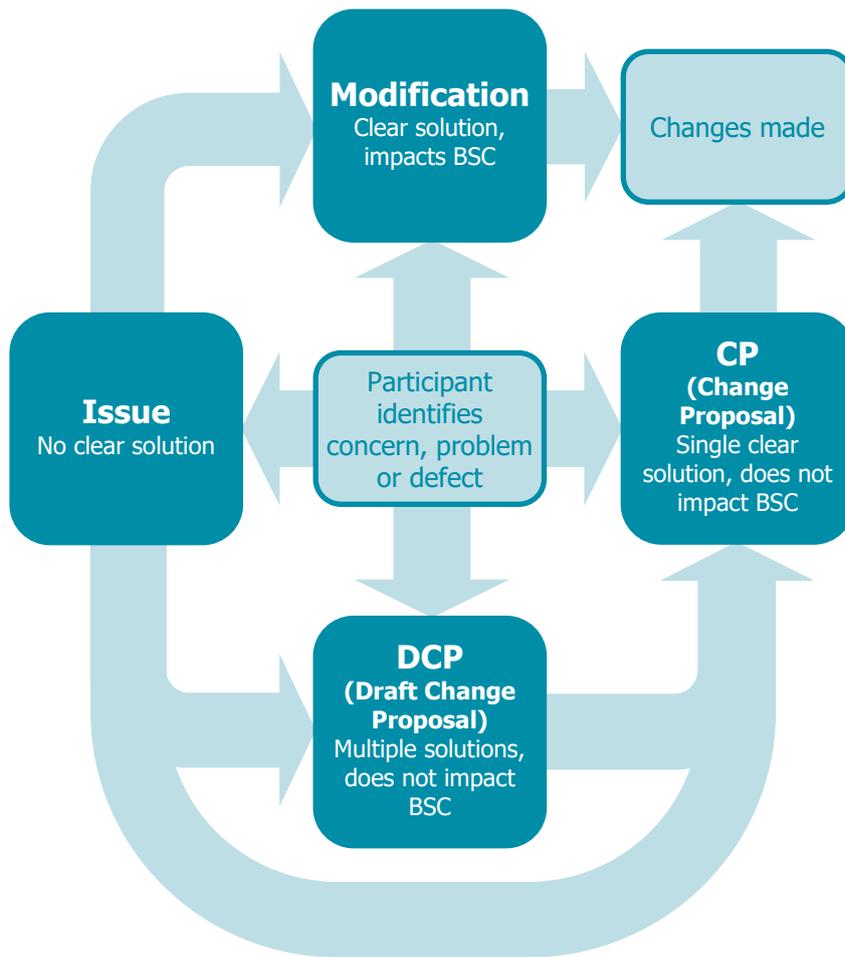
A DCP is usually completed within one to two months, after which a CP is required to take anything forward. Please note that, whilst this process remains in BSCP40, it's not commonly used and has been generally operationally replaced by the Issues process and by Elexon working with market participants in its role as a critical friend in developing proposals..

## Issues

If a participant has identified a problem or potential improvement to the current arrangements but does not know how it should be resolved, they can raise an Issue. The Issue will be discussed by an Issue Group, who will consider possible solutions to the problem. The Proposer can then decide which solution (if any) should be raised and how best this should be taken forward.

There are no set timescales for Issues, so an Issue can take varying amounts of time to complete depending on the nature and complexity of the problem in question, after which a Modification, CP or DCP is required to take anything forward.

## The different types of Change



## How am I informed of Changes?

We issue email notifications in relation to all types of Change. This includes whenever Changes are raised, consultations issued and decisions made or for other key events that we believe it is important to inform you of.

If you wish to be on the mailing list for receiving these emails, please email us at [bsc.change@elexon.co.uk](mailto:bsc.change@elexon.co.uk). We advise that you have these emails sent to a central 'shared mailbox' with a generic email address that several people at your organisation can access, rather than to an individual's address. This is so we can ensure our customers continue to receive these notifications, even when the named recipient is on leave, changes role or leaves the organisation.

# Modifications

## What is a Modification?

A Modification is raised in order to progress changes that would alter any part of the BSC. Any CSDs or BSC Systems impacted by the proposed changes would also be updated as part of the Modification.

Changes that would not alter the BSC itself but instead only impact CSDs and/or BSC Systems do not require a Modification, and are progressed using the CP process instead.

## Who governs the Modification procedures?

The Modification procedures are overseen by the BSC Panel, who will direct how a Modification is progressed. Elexon will assist the Panel throughout a Modification's progression, providing the advice, support and resources required, and will oversee the implementation of any approved Modifications. The processes for Modifications are laid out in [BSC Section F](#).

A Modification is deemed to be a Self-Governance Modification until it is seen not to meet the Self-Governance Criteria (see below for more information on these). Where a Modification is Self-Governance the Panel will make the final decision on whether the Modification should be approved. However, in the majority of cases (where a Modification is deemed not to be Self-Governance), the Panel will make a recommendation to Ofgem, as the Authority, on whether a Modification should be approved or not. Ofgem will then make the final decision on whether the BSC should be changed.

Any changes made to the BSC through a Modification must, in isolation to all other changes, better facilitate the Applicable BSC Objectives (as laid out in the Transmission Licence, Condition C3.3) when compared to the current BSC baseline, although Ofgem can consider wider implications if relevant when it makes its final decision. These Objectives are:

- (a) The efficient discharge by the National Electricity Transmission System Operator (NETSO) of the obligations imposed upon it by the Transmission Licence
- (b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System
- (c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity
- (d) Promoting efficiency in the implementation of the balancing and settlement arrangements
- (e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]
- (f) Implementing and administrating the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation
- (g) Compliance with the Transmission Losses Principle

## How can I raise a Modification?

Any BSC Party (except Elexon and its subsidiaries), Citizens Advice, Citizens Advice Scotland, other bodies designated by the BSC Panel and, in limited cases, the BSC Panel, Ofgem, a Contracts for Difference (CfD) Counterparty or the Capacity Market (CM) Settlement Body can raise a Modification Proposal. Non-BSC Parties may raise a Modification subject to designation from the BSC Panel.

### BSC Parties

As a BSC Party, to submit a Modification, you will need to fill in a copy of the Modification Proposal form (available on the Elexon website) and submit it to [bsc.change@elexon.co.uk](mailto:bsc.change@elexon.co.uk). Guidance on completing this is contained within the form, but please contact us at the above email address if you require further assistance. We also advise that you contact us before raising a Modification, as we can offer guidance and advice on your proposal and assist you with drafting it before it is formally raised.

In order to be discussed at the next regular Panel meeting (which are held on the second Thursday of the month), a Modification needs to be submitted by 12noon on the Friday two weeks before at latest (this deadline may occasionally be amended to account for Bank Holidays). If you submit a Modification after this time, it will be presented at the following month's meeting instead.

When raising a Modification, please be aware that the Proposer (or their representative) is expected to introduce the Modification to the Panel at its next meeting, and is also expected to attend all Workgroup meetings should the Modification be submitted to an Assessment Procedure.

Please note that a submitted Modification Proposal can be refused if it would have substantially the same effect as an existing Modification Proposal that has yet to reach a final decision or has been rejected within the last two months.

### Non-BSC Parties

Non-BSC Parties need to submit a designation application to raise a Modification. We are here to help support and guide you through the designation process. If you are thinking of seeking designation to raise a Modification Proposal, please get in touch with us by emailing [bsc.change@elexon.co.uk](mailto:bsc.change@elexon.co.uk). The designation application is made up of three key things:

1. A Designation Request Form – provides details of designation request, including why you want to amend the BSC
2. A Modification Proposal Form – provides details of the change you are seeking to make to the BSC
3. A Third Party Applicant Letter – confirms your rights and obligations under the BSC

Where Elexon considers the application to be invalid, the reasons will be provided to the applicant. Elexon will act as a critical friend to non-BSC Parties prior to submissions of their application.

Where a valid application is submitted, Elexon will prepare a paper for the next available Panel meeting, outlining the designation request and proposed changes. Elexon will inform Industry that a non-BSC Party is seeking designation at the next Panel meeting. The applicant will be invited to present their change to the Panel, who will decide whether to designate the non-Party or not.

Where the non-Party is designated, its Modification Proposal will be raised and progressed in accordance with the normal Modification Procedure, which is outlined below. Similarly to a Modification Proposal raised by the Panel, a non-Party's Modification Proposal shall be raised on the day of the designation. Following the raising of the Modification Proposal, Elexon will notify Industry, providing details of the Modification and the designation. Where the Panel rejects the designation

request, Elexon will notify Industry, including the applicant, of the decision and the reasons for the Panel's rejection. The interested non-BSC Party whose designation request is rejected by the BSC Panel can appeal the Panel's decision to Ofgem.

Within 15 Working Days of the Panel designating a non-Party to raise a Modification Proposal, BSC Parties who disagree with the decision of Panel can raise an appeal to the Authority in writing. The grounds of an appeal would likely be based on the Panel's application of the designation criteria or Ofgem's wider statutory duties.

## **Can I change or withdraw my Modification Proposal?**

The proposed solution to a Modification is 'owned' by the Proposer, who may amend the proposed solution at any time before the Modification is submitted to the Report Phase (at which point the solution is fixed). Any amendments to the solution must continue to address the same issue or defect that was originally identified when the Modification was raised. An Alternative Modification developed by the Workgroup is owned by the Workgroup as a whole and so cannot be amended by the Proposer.

The Proposer can also elect to withdraw the Modification at any time before it is submitted to the Report Phase. Elexon will inform the industry should the Proposer wish to withdraw their Modification. Another BSC Party can, if they want, choose to adopt the Modification within five Working Days of this notification. If this happens, that Party then becomes the Proposer of the Modification, which will continue to be progressed in line with the agreed timetable. If no-one elects to adopt the Modification within this time then it is closed.

## **How is a Modification progressed?**

A Modification will typically progress through several stages of assessment before a final decision is made, which will typically take six to eight months (other progression routes are explained later in this document). In addition, there will be a lead time needed between approval and implementation of a Modification, which will depend on the nature of the particular change. You will need to take these timescales into account when raising a Modification, as in many cases it can take well over a year between a Modification being raised and it being implemented.

### **Initial Written Assessment**

Once a Modification has been raised, we will produce an Initial Written Assessment (IWA), which we will present to the Panel at its next meeting. This IWA will summarise the proposal and will contain a recommended plan and timetable for progressing the Modification and the proposed Terms of Reference for any Workgroup. At its meeting, the Panel will consider these proposals and will decide how the Modification should be progressed. In the majority of cases, a Modification will be submitted to an Assessment Procedure, but if the Panel deems a Modification to be self-evident then it can submit it straight to the Report Phase.

### **Assessment Procedure**

Most Modifications will undergo an Assessment Procedure where it will be assessed in detail by a Workgroup (group of relevant subject experts convening to develop a solution to the issue(s) raised). As part of its assessment, the Workgroup will:

- Help the Proposer in developing the proposed solution, including producing draft BSC legal text;

- Consider the costs and impacts the Modification would have and what lead time would be required for implementing the Modification;
- Provide a view on whether the Modification would better facilitate the Applicable BSC Objectives;
- Develop an Alternative Modification if it thinks there is an alternative solution to the issue that would better facilitate the Applicable BSC Objectives than the proposed solution; and
- Consult with the industry on its views and recommendations.

The Assessment Procedure will typically last for three to four months, after which the Workgroup will present its Assessment Report, containing its full discussions, considerations and recommendations on the Modification, to the Panel.

### Report Phase

After considering the Workgroup's Assessment Report (or the IWA if the Modification was sent straight to the Report Phase), the Panel will provide an initial recommendation on the Modification. It will then consult with the industry on its initial recommendations, before making a decision (in the case of Self-Governance Modifications) or providing a final recommendation to Ofgem (in the case of Modifications which are not Self-Governance) on whether the Modification should be approved or rejected. See below for 'What is a Self-Governance Modification?'

The Report Phase will typically last for one to two months, depending on whether the Modification also impacts the European Electricity Balancing (EBGL) terms and conditions held within the BSC. At the end, the Panel will produce its Modification Report, which will contain all of the views, discussions and considerations on the Modification throughout its progression, along with the Panel's decision or final recommendations.

### EBGL Change Process

The [European Electricity Balancing Guideline \(EBGL\)](#) came into force on 18 December 2017. The EBGL was published as Commission (EU) Regulation 2017/2195, establishing a guideline on electricity balancing. Article 18 of the EBGL sets obligations on the Transmission System Operators (TSOs) of each Member State to develop the terms and conditions for Balancing Service Providers (BSPs) and Balancing Responsible Parties (BRPs). It also describes at a high level what these balancing and imbalance terms and conditions must cover. As the BSC already covered some of these items, the National Electricity System Operator (NETSO) created a proposal that meant some of these existing BSC provisions also covered the EBGL requirements, which Ofgem subsequently approved. Further, the EBGL outlines a separate change process for how these terms and conditions can be amended. This means that any BSC Modification that impacts BSC provisions that also constitute EBGL Article 18 terms and conditions (outlined in BSC Section F Annex F-2) must also be subject to the EBGL Change Process.

The EBGL change process officially begins in the Report Phase of a Modification and is based on there being one process that satisfies two legal frameworks: the BSC Change Process and the EBGL Change Process (as described in EBGL Article 10). Any BSC Modification that impacts the EBGL cannot be progressed as Self-Governance as Ofgem must make the final decision, per EBGL requirements. This is reflected in the Self-Governance Criteria.

If a BSC Modification is also considered to impact the Article 18 terms and conditions held within the BSC, it will be subject to a one month consultation in the Report Phase of the Modification process. If comments are received that may require the Modification Proposal to be amended the Modification can be submitted back to the Workgroup. The Workgroup have the power to amend the Draft Modification Report and must include sound justification for including or not including the views

resulting from the consultation, and may also amend other parts of the report to take account of its further analysis and make recommendations to the BSC Panel.

Under a Send Back direction for Modifications that wholly or partly impact EBGL Article 18 terms and conditions, the Panel will consider the next appropriate steps to take. This may include reconvening the workgroup to make amendments to the Modification in consideration of Ofgem's Send Back Direction. It may also include further consultation if it considers this necessary (provided that any such steps must be completed within two months). If a second consultation is needed this does not need to be a consultation of one calendar month, as this requirement of the EBGL process will have already been completed at this point..

However, the two month timeframe mandated under EBGL to submit a revised proposal to Ofgem may prove challenging if a Workgroup were to be reconvened and a further consultation held. In this circumstance, a report may be resubmitted to Ofgem, with a recommendation that a further Workgroup and/or consultation be held. In this circumstance, Ofgem may issue a further Send Back Direction.

For further information on the EBGL Change Process, please see the [P392 'Amending BSC Change Process for EBGL Article 18' webpage](#). Alongside all the relevant documentation, there is also a webinar explaining the impacts of the EBGL on the BSC Change Process in more detail.

## Final Decision

The decision on whether to approve or reject the Modification is made by the Panel in the case of Self-Governance Modifications. BSC Parties will then have 15 Working Days to appeal the decision to Ofgem should they wish. If no appeal is notified, the Panel's decision is final.

If it is not a Self-Governance Modification the Panel will make its final recommendation. This will be included in the Modification Report, which is sent to Ofgem for its consideration and determination. Ofgem will then make a final decision on whether to approve or reject the Modification.

Ofgem will normally aim to make its decision within 25 Working Days of receiving the Modification Report, unless it feels it needs to undertake its own Regulatory Impact Assessment first. Once it has made its decision, Ofgem will produce a letter detailing its decision and the reasons behind it. Should Ofgem feel that it does not have enough information to make a decision, it can send the Modification back to the Panel requesting further assessment/information.

## Implementation

If a Modification is approved, it will be implemented in accordance with the timescales identified during assessment. In most cases, a Modification will be implemented as part of one of the three planned BSC Systems Releases scheduled for each year ([February](#), [June](#) and [November](#)), though some Modifications may need to be implemented on other, standalone dates. Further information on Releases can be found on the [Releases](#) page of the [BSC Website](#).

The lead time for a Modification will vary greatly depending on the nature and complexity of the solution, and can vary from a single Working Day after approval for document-only changes to a year or more if complex system changes are required.

## What is an Urgent Modification?

If the issue highlighted by the Modification needs to be resolved urgently, the Proposer, Elexon or NETSO can request that the Modification be an Urgent Modification. An Urgent Modification can be progressed by a different process and timetable to normal, to cater for the urgent nature of the Modification; this is determined and approved on a case-by-case basis. Where an Urgent Modification Proposal impacts the EBGL Article 18 terms and conditions it must undergo the extended BSC Modifications process which covers also covers the EBGL change processes, including an industry consultation of one calendar month.

If urgency is requested then the Panel Chairman will consult with the Panel before recommending to Ofgem whether urgency should be granted. Ofgem will then make the final decision on whether the Modification should be granted urgency and, if so, what the timetable and process should be.

Ex-post reviews of implemented Urgent Modifications are carried out to decide whether the Modification could have been made in an alternative way that would have better facilitated the Applicable BSC Objectives.

## What is a Self-Governance Modification?

All Modifications should, in the first instance, be considered as a Self-Governance Modification. You will need to indicate on the Modification Proposal Form whether you believe it should be Self-Governance or not, and why. If you are unsure, please contact us at [bsc.change@elexon.co.uk](mailto:bsc.change@elexon.co.uk).

For a Modification to proceed as Self-Governance it must meet the Self Governance Criteria, i.e. it must be a proposal that, if implemented:

- (a) Does not involve any amendments whether in whole or in part to the EBGL Article 18 terms and conditions, except to the extent required to correct an error in the EBGL Article 18 terms and conditions or as a result of a factual change, including but not limited to:
  - i) Correcting minor typographical errors;
  - ii) Correcting formatting or consistency errors, such as paragraph numbering; or
  - iii) Updating out of date references to other documents or paragraphs.
- (b) Is unlikely to have a material effect on:
  - i) Existing or future electricity consumers; and
  - ii) Competition in the generation, distribution or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity; and
  - iii) The operation of the national electricity transmission system; and
  - iv) Matters relating to sustainable development, safety or security of supply, or the management of market network emergencies; and
  - v) The Code's governance procedures or modification procedures; and
- (c) Is unlikely to discriminate between different classes of Parties.

## **What is a Fast Track Self-Governance Modification?**

A Fast Track Self-Governance Modification is used to make self-evident housekeeping changes to the BSC, such as updating names, addresses and references within the Code or correcting typographical, formatting and consistency errors. If a change meets this criteria and the Self-Governance Criteria above then the Proposer can request that the Modification is progressed as a Fast Track Self-Governance Modification.

In order for a Modification to progress via the Fast Track route, the Panel must unanimously agree that the above conditions are met when considering the IWA. If it does then the Modification will proceed directly to a decision by the Panel. BSC Parties will then have 15 Working Days following the Panel's decision to object to the decision to Elexon should they wish. If no objection is notified, the Panel's decision is final.

Whilst a Modification that seeks to amend the EBGL Article 18 terms and conditions cannot be progressed as Self-Governance, it may be progressed as Fast Track Self-Governance where the changes are immaterial (for example, but not limited to, the correction of manifest or typographical errors) as outlined in the Self-Governance criteria.

If the Panel does not unanimously agree to progress via the Fast Track route or if any objections are raised by BSC Parties then the Modification will no longer be Fast Track and will instead progress down either the normal or the Self-Governance route.

## How can I participate in the Modification process?

There are two ways that industry members can participate in a Modification's progression.

### Joining the Workgroup

If a Modification is progressed to an Assessment Procedure, a Workgroup is formed in order to carry out a detailed assessment. A Workgroup's membership will consist of:

- The Proposer (or a representative appointed by them);
- At least five industry experts who have qualified to act as independent Workgroup members; and
- A representative from the NETSO (at its own discretion).

A representative from Ofgem may also attend and participate in discussions, as can any other interested Parties. However, these attendees are unable to vote when the Workgroup comes to provide its recommendations.

In addition, Elexon will provide employees as appropriate (a Chairman, the Lead Analyst, the Lead Lawyer and a Design Authority representative or other technical specialist).

Industry experts on a Workgroup are expected to act independently of their respective organisations, and are expected to remain a part of the Workgroup for the duration of its Assessment Procedure. If you wish to volunteer to be a Workgroup member, please email [bsc.change@elexon.co.uk](mailto:bsc.change@elexon.co.uk).

### Responding to Consultations

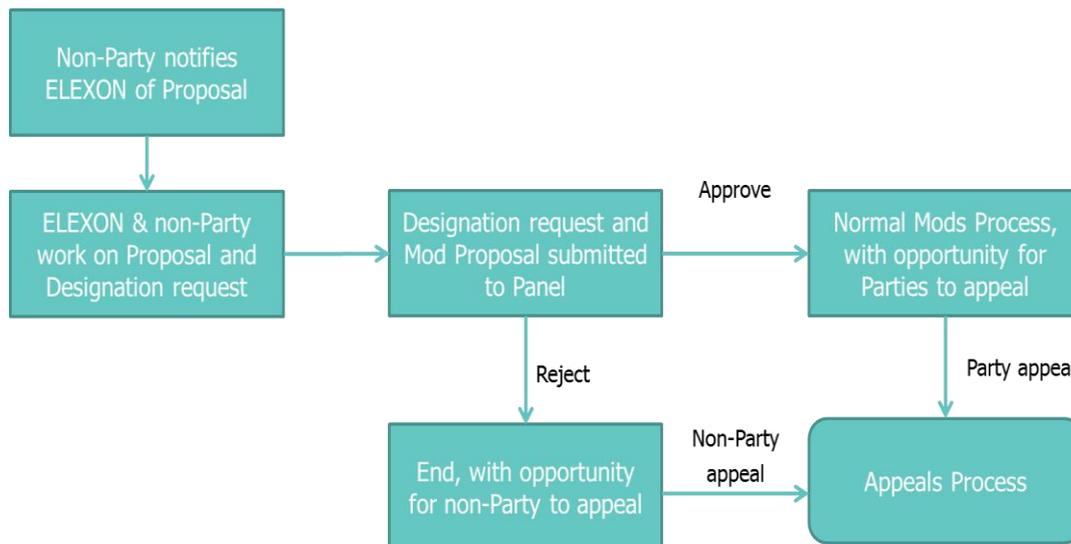
During a Modification's Assessment Procedure, the Workgroup will consult with the industry on:

- Its initial recommendations;
- The proposed legal text;
- The proposed implementation approach;
- Any alternative solutions the Workgroup may have considered; and
- Any other questions the Workgroup feels appropriate.

The Workgroup may also issue an Impact Assessment if it feels there may be a significant impact on market participants, in order to assess the impacts, costs and lead times required for any changes Parties may need to make to implement the Modification.

The Panel will also consult with the industry during the Report Phase, to seek views from market participants on its initial recommendations.

We encourage you to respond to these consultations, as all responses are taken into consideration by the Workgroup, the Panel and Ofgem. Please be aware that any confidential responses will not be shared with the Workgroup, the Panel or the wider industry, but will be submitted to Ofgem alongside the Modification Report.



### Submit application to Elexon

Non-BSC Parties will submit applications to Elexon for validation by completing the three forms, which can be downloaded from the BSCP40 Change Management page, where you can also find guidance on how to complete the forms. Where ELEXON considers the application to be invalid, the reasons will be provided to the applicant. ELEXON will act as a critical friend to non-BSC Parties prior to submissions of their application to increase the likelihood of a successful application.

### Application submitted to Panel

Where a valid application is submitted, Elexon will prepare a paper for the next available Panel meeting. You will be invited to present your proposed change to the Panel.

### BSC Panel decision

The Panel will hear from you and will decide whether to accept the Designation request or not.

### Panel approves request

Where your Designation request is approved, the associated Modification Proposal will be raised and progressed in accordance with the standard Modification Procedures and the timetable set by the Panel.

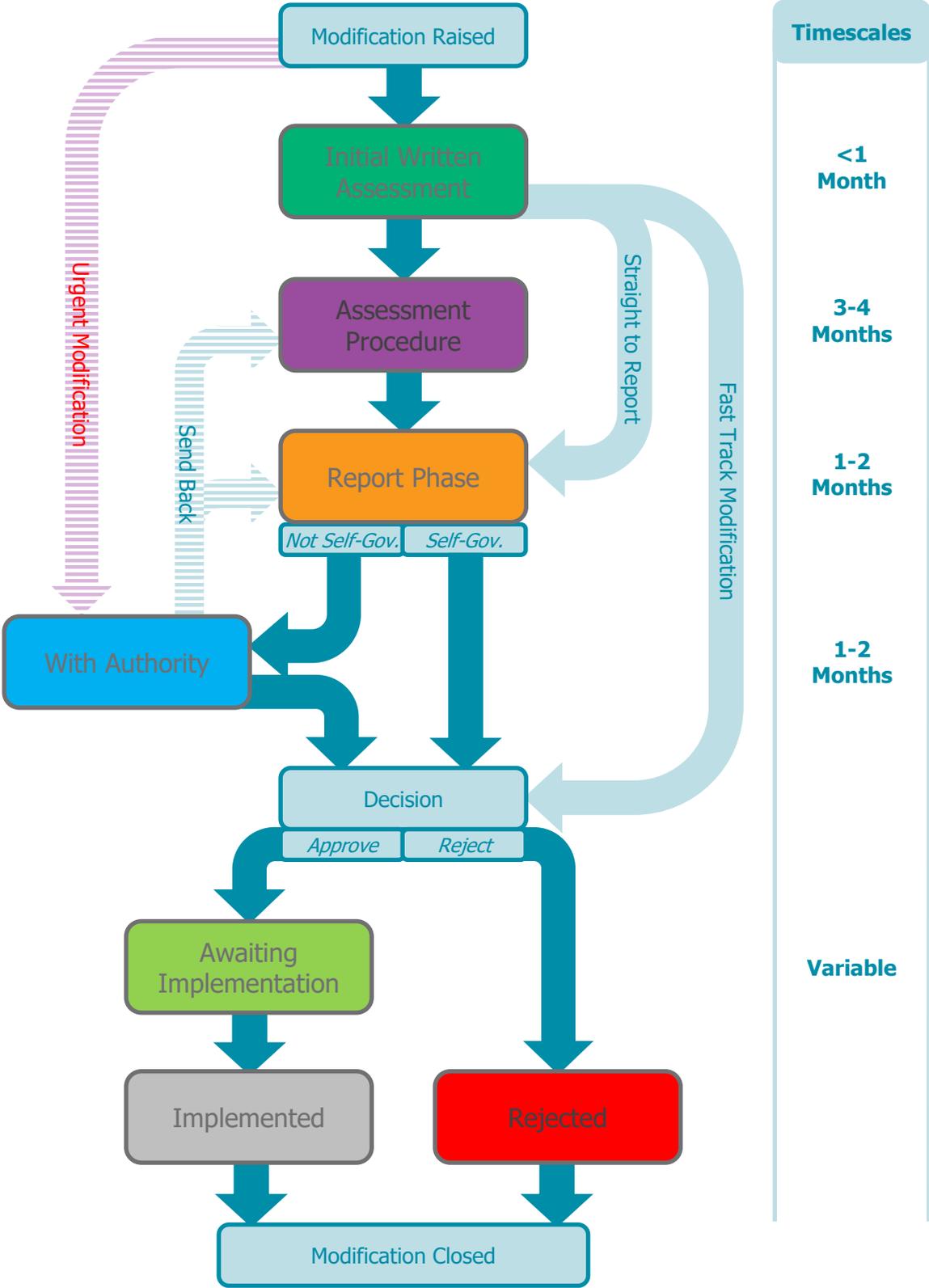
### Panel rejects request

Where your Designation request is rejected, Elexon will notify you and Industry via email, of the decision and the reasons for the Panel's refusal. You may appeal the Panel's decision to Ofgem. BSC Parties can appeal the BSC Panel's decision to designate a non-BSC Party to Ofgem as the Authority.

Please note, each designation of a non-BSC Party to raise a Modification Proposal is for one Modification Proposal and cannot be for multiple Modifications or left open for future Proposals. If a non-BSC Party wishes to raise another Modification, they would require another designation.

If you are thinking of seeking designation to raise a Modification Proposal, please get in touch with us by emailing [bsc.change@elexon.co.uk](mailto:bsc.change@elexon.co.uk).

# Modification Progression



# Change Proposals

## What is a Change Proposal?

A CP is a detailed proposal which is raised in order to amend CSDs and/or BSC Systems, but would not alter the BSC. A CP must have a clear aim, a single defined solution and contain the relevant redlined documentation changes.

Since CPs must have a single clear solution, if there are multiple solutions being raised or there is concern over industry support then you should consider raising an Issue or a DCP instead. These allow for multiple solutions to be assessed and allow the Proposer to use the industry to further develop their change.

It should be noted that a CP cannot alter the BSC. If your proposal would alter the BSC itself, you will need to raise a Modification instead.

## Who governs the CP procedures?

The CP procedures are overseen by the BSC Panel, but it has delegated this responsibility to its Panel Committees. Elexon will assist the Panel Committees throughout a CP's progression, providing the advice, support and resources required, and will oversee the implementation of any approved CP. The processes for CPs are laid out in [BSCP40](#).

The final decision on whether a CP is approved or rejected is taken by the relevant Panel Committee(s) responsible for the impacted Configurable Items. In most cases, only the Imbalance Settlement Group (ISG) or Supplier Volume Allocation Group (SVG) will progress CPs, but in some cases endorsement will also be required from the Performance Assurance Board (PAB) or Trading Disputes Committee (TDC). The decision needs to be unanimous both within a Committee and across all the relevant Committees, and that decision is final. If there is disagreement, the CP is escalated to the Panel for a final decision.

## How can I raise a CP?

CPs can be raised by Elexon, BSC Agents, BSC Parties, the BSC Panel, Panel Committees, Citizens Advice and Citizens Advice Scotland. Please note that Party Agents and non-BSC Parties cannot raise CPs, and will need to ask a BSC Party to raise one on their behalf.

To submit a CP, you will need to fill in a copy of form [BSCP40/02](#) and submit it to [bsc.change@elexon.co.uk](mailto:bsc.change@elexon.co.uk). Guidance on completing this can be found at the end of this form, but please contact us at the above email address if you require further assistance. We also advise that you contact us before raising a CP, as we can offer guidance and advice on your proposal and assist you with drafting it before it is formally raised.

Draft redlining is required for any CSDs classed as Category 1 Configurable Items under the BSC Baseline Statement that will be impacted by the CP, and this needs to be produced before the CP is issued for consultation. We will usually produce this on behalf of the Proposer before the CP is issued for consultation. Please see the [BSC Baseline Statement](#) for a list of which CSDs are Category 1.

## Can I change or withdraw my CP?

Once a CP has been raised and issued for consultation, the solution is fixed and cannot be changed or withdrawn. The only changes permitted to the proposed redlining included in the CP would be to correct any errors or provide any further clarity that may be required. If you wish to amend a CP's solution, the original CP will generally need to be rejected and a new CP raised in its place, though in certain circumstances it may be appropriate to approve the original CP and then raise a further CP to provide further clarity.

## How is a CP progressed?

A CP will be assessed and issued for a consultation (unless it has been agreed to meet the conditions of a De Minimis BMRS Change, as defined in BSCP40) before a final decision is made, which will typically take around three months in total. In addition, there will be a lead time needed between approval and implementation of a CP, which will depend on the nature of the particular change. You will need to take these timescales into account when raising a CP, as it usually takes at least six months between a CP being raised and being implemented, and can take a year or more in some cases.

### Assessment

Once a CP has been raised, we will assess the central costs and impacts of the CP and ensure the required redlined changes to the relevant Configurable Items are produced. Once this is complete, we will present the CP to the relevant Panel Committee(s) for their initial view on the proposed change. As applicable, the Committee will decide whether a CP should be progressed as a Housekeeping or De Minimis BMRS CP. This phase will normally take no longer than a month to complete.

### CPC Consultation

Once a CP has been presented to the relevant Committee(s) for initial comment, it will be issued as part of the next available Change Proposal Circular (CPC) Batch. These CPCs are issued once a month, and invite market participants to carry out an Impact Assessment, in order to help us to understand the costs and impacts the CP will have on organisations, the required lead times to make the changes, and their views and opinions on the proposed changes. Please see the CP IA Timetable within the [Change Register](#) for the relevant dates for each CPC. Please note that 'Housekeeping' CPs and De Minimis BMRS CPs will not be issued for consultation as they are considered to be self-evident. However, there is a process by which Parties and Party Agents can object to Housekeeping and De Minimis BMRS CPs (see below).

### Committee Decision

A CP will be presented to the relevant Panel Committee(s) for decision at their next meeting(s) following the end of the CPC consultation. The Committee(s) will consider each CP and the views of respondents to the consultation before making a decision on whether the CP should be approved or rejected. This decision needs to be unanimous; if such a decision cannot be reached across the relevant Panel Committee(s) then the CP is escalated to the Panel.

When a Housekeeping CP or De Minimis BMRS CP is approved by the relevant Committee(s), a 15 Working Day objection window will be opened to allow Parties and Party Agents to object to the CP being a Housekeeping or De Minimis BMRS Change. Objections should be made if Parties or Party Agents believe the CP does not meet BSCP40's definition of a Housekeeping or De Minimis BMRS Change. Parties and Party Agents will be notified of the Housekeeping or De Minimis BMRS CP's approval via email. Should an objection come through, the CP will go out for CP Consultation and then back to the relevant Panel Committee for final decision, as per the normal CP process.

## Implementation

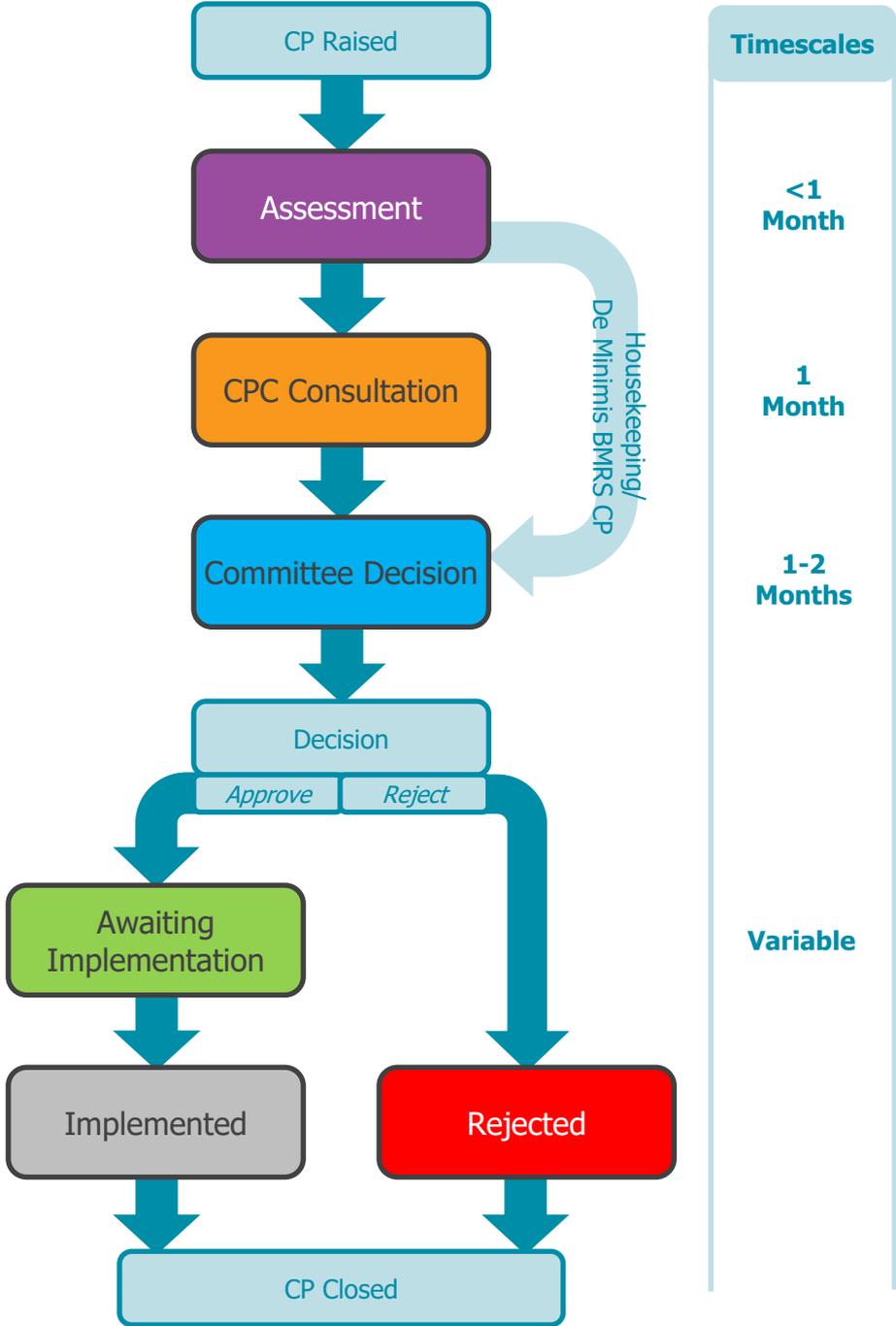
If a CP is approved, it will be implemented in accordance with the timescales identified during assessment. A CP will be implemented as part of one of the three planned BSC Systems Releases scheduled for each year ([February](#), [June](#) and [November](#)), unless there is a clear need to implement on another date. Further information on Releases can be found on the [Releases](#) page of the [BSC Website](#).

The lead time for a CP will depend on the nature and complexity of the solution. Document-only changes with little material impact will usually be implemented in the next available Release. If the CP will require system changes or the impacts are more complex a longer lead time may be needed.

## How can I participate in the CP process?

All CPs (except Housekeeping and De Minimis BMRS CPs) are issued for consultation to seek the views from industry members on the CP and its impacts. We encourage you to respond to these, as all responses are taken into consideration by the relevant Panel Committees. Please be aware that any confidential responses will not be shared with the wider industry, but will be submitted to the relevant Panel Committee(s) when they make their decision.

# CP Progression



# Draft Change Proposals

## What is a Draft Change Proposal?

If you have identified an issue that would require a CP but you have more than one potential solution, you can raise a DCP to seek views from industry members on which solution (if any) would be the best to take forward as a CP.

A DCP is solely used to seek views on potential solutions for a CP, and will not itself make any changes to CSDs or BSC Systems. You will need to raise a CP following the conclusion of the DCP if you wish to progress any potential changes.

## How can I raise a DCP?

DCPs can be raised by Elexon, BSC Agents, BSC Parties, the BSC Panel, Panel Committees, Citizens Advice and Citizens Advice Scotland. Please note that Party Agents cannot raise DCPs, and will need to ask a BSC Party to raise one on their behalf.

To submit a DCP, you will need to fill in a copy of form [BSCP40/01](#) and submit it to [bsc.change@elexon.co.uk](mailto:bsc.change@elexon.co.uk). Guidance on completing this can be found at the end of this form, but please contact us at the above email address if you require further assistance. We also advise that you contact us before raising a DCP, as we can offer guidance and advice on your proposal and assist you with drafting it before it is formally raised.

Unlike CPs, you do not need to produce any redlining for a DCP. You simply need to detail the issue and potential solutions that could be taken forward as a CP for the industry to comment on.

## How is a DCP progressed?

A DCP will be issued in the next CPC Batch for industry consultation. Once responses have been received, we will pass these to the Proposer, who will then decide whether or not to take forward any of the proposed solutions as a CP.

A DCP will usually be completed within one to two months. Any further progression will be done as a CP.

## How can I participate in the DCP process?

All DCPs are issued for consultation to seek the views from industry members on the proposed solutions. Respondents can also suggest alternative solutions that they feel may be better than those put forward. We encourage you to respond to these, as all responses are taken into consideration by the Proposer in deciding which solution (if any) to progress.

# Issues

## What is an Issue?

If you have identified a potential problem, but you do not have any clear solutions that could be progressed, you can raise an Issue to seek views from industry members on whether they agree with your problem and what potential solutions could be raised.

An Issue is solely used to seek views on potential solutions for an identified problem, and will not itself make any changes to the BSC, CSDs or BSC Systems. You will need to raise a Modification, CP or DCP following the conclusion of the Issue if you wish to progress any potential changes.

## How can I raise an Issue?

Issues can be raised by Elexon, BSC Agents, BSC Parties, the BSC Panel, Panel Committees, Citizens Advice, Citizens Advice Scotland, and non-BSC Parties or interested third parties, including Party Agents.

To submit an Issue, you will need to fill in a copy of form [BSCP40/04](#) and submit it to [bsc.change@elexon.co.uk](mailto:bsc.change@elexon.co.uk). Guidance on completing this can be found at the end of this form, but please contact us at the above email address if you require further assistance. We also advise that you contact us before raising an Issue, as we can offer guidance and advice on your proposal and assist you with drafting it before it is formally raised.

Where Elexon is unsure of whether an Issue is of relevance or importance to the BSC, we will seek advice and guidance from the relevant Panel Committee(s) as to whether the Issue should be raised.

## How is an Issue progressed?

Once an Issue has been raised, an Issue Group will be formed to discuss the identified problem and consider what solutions could be raised to resolve it. There is no fixed process for an Issue Group, and an Issue's progression will be determined in an ad-hoc manner depending on how the discussions progress. There are standard terms of reference that apply to all Issue Groups. The Issue Group Terms of Reference provide clarity to the governance and operation of Issues, including the role of an Issue Group in making recommendations and how any voting should work. Once the Group has finished its discussions, it will produce a report on its views and recommendations, which will be presented to the Panel for information.

It should be noted that an Issue Group will propose and consider potential solutions to the problem highlighted, but it is not required to impact assess or develop these. Any further assessment or development would be left until a solution has been taken forward as a Modification, CP or DCP.

There are no set timescales for Issues, so an Issue can take varying amounts of time to complete depending on the nature and complexity of the problem in question. Once a solution has been identified, any further progression would be done as a Modification, CP or DCP.

## How can I participate in the Issue process?

Issue Groups are open to anyone who wishes to attend. If you are interested in the problem that has been highlighted by an Issue, or you have expertise in the relevant areas, we would encourage you to join the Issue Group.

## Need more information?

- [BSC Section F: Modification Procedures](#)
- [BSCP40: Change Management](#)

For further information please contact the [BSC Service Desk](#).

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