

CP Progression Paper

CP1480 'Creation of a new authorisation category for corrections to BOA Related Data'

ELEXON



Committee

Supplier Volume Allocation Group / Imbalance Settlement Group



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About This Document

This document provides information on new Change Proposal (CP) CP1480 and outlines our proposed progression timetable for this change, including when it will be issued for CP Consultation in the next suitable Change Proposal Circular (CPC) batch.

We are presenting this paper to capture any comments or questions from the Imbalance Settlement Group (ISG) and Supplier Volume Allocation Group (SVG) Members on this CP before we issue it for consultation.

There are four parts to this document:

- This is the main document. It provides a summary of the solution, impacts, anticipated costs, and proposed implementation approach, as well as our proposed progression approach for this CP.
- Attachment A contains the CP1480 proposal form.
- Attachments B and C contains the proposed redlined changes to deliver the CP1480 solution.

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1 Why Change?

What is the current process?

The Transmission Company (TC) must send Bid-Offer Acceptance (BOA) Related Data to the Settlement Administration Agent (SAA). The TC can correct errors in this data, if they identify the error at least eight Working Days before the Initial Settlement Run (SF). Errors can be data that is incorrect, non-applicable or missing. The full process, including timescales, is set out in [BSC Procedure \(BSCP\) 18 'Corrections to Bid-Offer Acceptance Related Data'](#). As part of this process, the TC must send details of the proposed correction to the Party involved and gain their consent for the correction to be made and sent to the SAA.

What is the issue?

BSCP18 is ambiguous on who may authorise corrections to BOA Related Data. It states the TC must contact 'authorised personnel at BSC Party' but does not state explicitly who this should be at the BSC Party. This lack of clarity is creating problems for the TC when trying to identify the right individual to contact and can cause delays.

The TC is currently using a workaround, which involves contacting the BSC Service Desk to request contact details for a particular Party. The BSC Service Desk then contacts the Party to ask for them if they are happy for the contact details to be shared with the TC. This process is inefficient and does not always provide the TC with the information it requires if a Party does not respond.

If the TC is unable to gain consent for the correction then the error will enter Settlement at SF and can affect the imbalance price. The error can be raised as a Trading Dispute in accordance with [Section W 'Trading Disputes'](#) and the process set out in [BSCP11 'Trading Disputes'](#). However if the error does not meet the criteria for a Trading Dispute, for example because its materiality is less than £3,000, then it cannot be resolved. If it does become a Trading Dispute, the process can be lengthy and require extra effort from Parties and ELEXON, so it is preferable to correct the error before SF.

The TC has informed ELEXON that there are at least two or three incidents per month which require it to seek consent for corrections. For around 20% of these incidents it has difficulty identifying a contact or is unable to contact anyone at all.



Bid-Offer Acceptance Related Data

In BSCP18, the term 'Bid-Offer Acceptance Related Data' is used to refer to any of the following:

- Final Physical Notification (FPN),
- Bid-Offer Data (BOD),
- Quiescent Physical Notification (QPN),
- Bid-Offer Acceptance Level (BOAL) and
- Bid-Offer Acceptance Level Flagged (BOALF) data.

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Proposed solution

National Grid Electricity Transmission Plc raised [CP1480 'Creation of a new authorisation category for corrections to BOA related data'](#) on 28 November 2016. To provide clarity on who can provide consent for corrections to BOA Related Data, it proposes that a new category of Authorised Persons (Category "E") is created specifically for that activity within [BSCP38 'Authorisations'](#).

The process in BSCP18 will explicitly reference this category. When a Party nominates an individual to be a Category "E" Authorised Person, they will be required to provide consent for ELEXON to share their information with the TC specifically for purpose of considering corrections to BOA Related Data in accordance with BSCP18. In this regard, the form which Parties use to create new authorisations, BSCP38 section 5.1 part C, will contain a consent statement which a Party must acknowledge and agree to when creating a Category "E" authorisation. The same statement will also require acknowledgement, if a Party chooses to use the online form on the [ELEXON Portal](#) to create the new authorisation, rather than BSCP38/5.1. The statement will inform the Party that the Category "E" Authorised Person's information will be made available to the TC who may need to contact them to gain consent for corrections to BOA Related Data.

The name of the Category "E" Authorised Person, the Party which they represent, and their email and telephone contacts will be available to the TC. BSCP38 will place an obligation on the TC not to share this information with any other third party. The TC will have access to the Category "E" information via the ELEXON Portal.

The Central Registration Agent (CRA) will be responsible for a one-off exercise to create and add Category "E" Authorised Persons to the Authorisation Register. They will also perform an annual confirmation process as they do for all other authorisation categories.

Proposer's rationale

The Proposer believes that by having a clearly defined process with specific individuals who have the authorisation to provide consent to BOA data corrections, it will speed up the process and reduce the chance of errors entering Settlement.

Proposed redlining

Attachments B and C contain the proposed changes to BSCP18 and BSCP38 respectively to deliver CP1480.

ELEXON's views

ELEXON believes there are constraints with the proposed solution, as described below, which mean that it may not be the most efficient way of resolving the difficulties that the TC is facing.

- i) From experience of similar exercises, ELEXON believes it is likely that not all Parties will respond to a communication asking for Category "E" nominations and that a low response rate will mean that the TC still does not have a contact point for every Party for this purpose.

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- ii) Category "A" Authorised Persons have the same powers as all other categories but we do not believe it is appropriate to propose sharing all Category "A" contact details with the TC. For large organisations, Category "A" Authorised Persons are often company directors who will usually not be the correct people to deal with such operational issues. Conversely, some smaller organisations only have Category "A" Authorised Persons so this will mean the TC does not have a list of every person that can give consent to BOA data corrections.

ELEXON believes there is no need to restrict who can give consent to BOA data corrections to only certain Authorised individuals, unless Parties feel there needs to be tighter controls on this. We intend to ask a question on this in the CP Consultation – see Section 5 below. ELEXON understands that the TC has the option of establishing a process and bilateral contact details for getting consent directly with Parties without placing obligations in the BSC and BSCPs that may not achieve the TC's desired outcome.

3 Impacts and Costs

Central impacts and costs

The central implementation costs for CP1480 will be approximately **£8,000**. This includes costs to deliver changes to systems and documents.

The CRA will need to activate the new Category "E" in its database and make changes to the ELEXON Portal to allow the TC to have access to Category "E" details. This will require system changes. The CRA will also conduct a one-off exercise to contact Parties to ask them to nominate a Category "E" individual(s).

The Customer Operations team within ELEXON is unlikely to be impacted by this change; however it may receive additional queries relating to the new authorisation category. We expect this to be absorbed by business as usual processes.

ELEXON will also make the necessary document changes, which will require one working day of effort.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">• BSCP18• BSCP38	<ul style="list-style-type: none">• CRA• ELEXON Portal

BSC Party & Party Agent impacts and costs

CP1480 is expected to impact Parties that participate in balancing mechanism activities (i.e. Suppliers and generators), if they chose to create a Category "E" Authorised Person. Such Parties will have to fill out the BSP38/5.1 form and may need to establish processes and roles for Category "E" Authorised Persons. We do not expect that other types of Party are likely to want to make use of Category "E". As part of the CP Consultation, we will seek to clarify the extent of the impact and any associated costs required to implement CP1480.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Generators Suppliers	May chose to nominate individuals for Category "E" authorisation.
Transmission Company	Will have access to Category "E" information.

4 Implementation Approach

Recommended Implementation Date

CP1480 is proposed for implementation on **29 June 2017**, as part of the June 2017 BSC Systems Release. This is the next available Release date that this CP can be included in.

5 Proposed Progression

Progression timetable

The table below outlines the proposed progression plan for CP1480:

Progression Timetable	
Event	Date
CP Progression Paper presented to ISG for information	13 Dec 16
CP Progression Paper presented to SVG for information	03 Jan 17
CP Consultation	09 Jan 17 – 01 Feb 17
CP Assessment Report presented to ISG for decision	21 Feb 17
CP Assessment Report presented to SVG for decision	28 Feb 17
Proposed Implementation Date	29 Jun 17 (Jun 17 Release)

CP Consultation questions

In addition to the standard CP Consultation questions for CP1480, we intend to ask an additional question as outlined below.

Standard CP Consultation Questions
Do you agree with the CP1480 proposed solution?
Do you agree that the draft redlining delivers the CP1480 proposed solution?
Will CP1480 impact your organisation?
Will your organisation incur any costs in implementing CP1480?
Do you agree with the proposed implementation approach for CP1480?

Additional CP Consultation Questions
Do you believe that is necessary or desirable to restrict who can authorise corrections to BOA Related Data?

The ISG also requested an additional question to be included in the CP Consultation, as discussed in section 6. We welcome the SVG's views on this.

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CP1480 was presented to the ISG at its meeting on 13 December 2016 ([ISG188/06](#)). Several ISG Members recognised the problems with the current situation but had concerns that the proposed solution may not achieve the desired outcome in practice, for similar reasons as highlighted in section 2.

One ISG Member noted that Balancing Mechanism (BM) Unit owners provide contact details for their control room when registering a BM Unit with the Transmission Company. The Member questioned whether this would provide a route into an organisation. They questioned whether these contact details would be sufficient. Or alternatively if a change could be made to the Grid Code to include an obligation on BM Unit owners to provide a contact for consenting to BOA Related Data corrections at the point that the BM Unit is registered with the Transmission Company. ELEXON agreed to include a question on these options in the CP Consultation.

7 Recommendations

We invite you to:

- **NOTE** that CP1480 has been raised;
- **NOTE** the proposed progression timetable for CP1480;
- **PROVIDE** any comments or additional questions for inclusion in the CP Consultation; and
- **NOTE** that this CP was presented to the ISG at its meeting on 13 December 2016.

Appendix 1: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
BM	Balancing Mechanism
BOA	Bid-Offer Acceptance
BSCP	Balancing and Settlement Code Procedure (<i>Code Subsidiary Document</i>)
CP	Change Proposal
CPC	Change Proposal Circular
CRA	Central Registration Agent
ISG	Imbalance Settlement Group (<i>Panel Committee</i>)
SAA	Settlement Administration Agent
SF	Settlement Final
TC	Transmission Company
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2, 3	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
2	BSC Sections	https://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/
3	CP1480 webpage	https://www.elexon.co.uk/change-proposal/cp1480/
3	ELEXON Portal on the ELEXON website	https://www.elexonportal.co.uk/news/latest
7	ISG 188 meeting webpage	https://www.elexon.co.uk/meeting/isg-188/?from_url=https://www.elexon.co.uk/events-calendar-item/isg-188/

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