

INITIAL WRITTEN ASSESSMENT for Modification Proposal P232 'Black Start and Fuel Security Compensation and Single Imbalance Price Derivation'

Prepared by: ELEXON Limited¹

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This document has been distributed in accordance with Section F2.1.10 of the Balancing and Settlement Code.²

P232 aims to improve transparency regarding the compensation arrangements pursuant to a Black Start or Fuel Security Code (FSC) period. Section G of the Balancing and Settlement Code (BSC) provides high level details of the compensation arrangements associated with a Black Start or FSC period, however, certain areas require further clarification.

BSCCO'S RECOMMENDATIONS

On the basis of the initial assessment, BSCCo invites the Panel to:

- **DETERMINE that Modification Proposal P232 should be submitted to the Assessment Procedure;**
- **AGREE the Assessment Procedure timetable such that an Assessment Report should be completed and submitted to the Panel for consideration at its meeting of 09 April 2008;**
- **DETERMINE that the P232 Modification Group be formed from members of the Settlement and Governance Standing Modification Groups (and should be the same Group that considers P231); and**
- **AGREE the Modification Group Terms of Reference.**

Potential impacts:

- **Parties:** Generators, Suppliers, Licence Exemptable Generators, Interconnector users and the Transmission Company.
- **BSC Agents:** the Funds Administration Agent (FAA).

¹ ELEXON Ltd fulfils the role of the Balancing and Settlement Code Company ('BSCCo'), pursuant to Annex X-1 of the Balancing and Settlement Code (the 'Code').

² The current version of the Code can be found at <http://www.elexon.co.uk/bscrelateddocs/BSC/default.aspx>.

Purpose of this document:

This document is an Initial Written Assessment (IWA), which ELEXON will present to the Panel on 15 January 2009. The Panel will consider the recommendations and agree how P232 should be progressed.

Further information is available in the P232 Modification Proposal form, which is an appendix to this document.

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1 WHY CHANGE?

In the event of a Fuel Security or Black Start period Parties are expected to adhere to certain activities which are outlined within the Balancing and Settlement Code (BSC). [Issue 32 'Black Start'](#)³ and [Issue 33 'Fuel Security Code \(FSC\)'](#)⁴ were raised in order to consider and develop requirements to enable the BSC Panel, BSC Parties, BSCCo and BSC Agents to fulfil their obligations in a transparent and timely manner.

The aim of this Modification is to refine the current compensation arrangements pursuant to a Black Start or FSC event. Although these processes and procedures are covered within the BSC, the proposer believes that that these arrangements require further clarification.

While this Modification amalgamates compensation issues pursuant to a Black Start and Fuel Security event these two events are different. Section 1.1.1 and 1.1.2 below provide a high level explanation of the two events.

The Issue Groups also discussed the processes and procedures associated with a Black Start and Fuel Security period. In addition the Groups discussed the specific roles and responsibilities of relevant participants. The changes from these discussions are being progressed as Modification Proposal P231.

1.1 Black Start

A 'Black Start' is a recovery process for restoring electricity on the Transmission System. Power stations need electricity from the Transmission System to start up and maintain their generators. If the Transmission System collapses, power stations would be unable to keep their generators running and as a result power stations would stop producing electricity.

Certain power stations have contracts with National Grid where they will be able to initiate a Black Start if the Transmission System collapses. These power stations do not require an external source of energy to produce electricity. In most instances, such power stations would use diesel generators to start larger generators and start generating in small 'pockets' throughout the country. In turn these 'pockets' are gradually connected to each other until the Transmission System is fully energised.

1.2 What is a Fuel Security Code event?

A 'Fuel Security Code' (FSC) event occurs when the Secretary of State exercises his powers under sections 34 and 35 of the Electricity Act 1989, to direct power stations to operate in specific ways (for example a power station could generate more or less energy in order to balance the electricity grid) or to direct Transmission Licensees (National Grid). A FSC 'direction' can be issued to one or multiple participants and a single FSC direction or several distinct FSC directions can be issued.

Unless specified by the Department for Energy and Climate Change (DECC), formerly the Department for Business Enterprise and Regulatory Reform (BERR)), information regarding a security period will be declared by National Grid to all impacted parties e.g. Generators, Distributors and other stakeholders.

2 P232 SOLUTION

Based on investigations carried out by Issue Groups 32 and 33, a number of conclusions were drawn, one of which was to put in place a more detailed process in order to recover relevant costs arising from a Black Start or Fuel Security event. This Modification proposes refinements relating to:

1. **The claims processes; and**
2. **The formulation of a single imbalance cash-out price.**

³ Issue 32 Black Start Report – Please refer to the following Link: [Issue 32 Black Start Report](#)

⁴ Issue 33 Fuel Security Code – Please refer to the following Link: [Issue 33 Fuel Security code](#)

2.1 Claims Process

2.1.1 Black Start Claims Process

The BSC allows BSC Parties to submit claims to the BSC Panel for costs incurred as a result of complying with a Black Start Instruction (Instructions will be issued in accordance with [The Grid Code - Contingency Planning](#)). Sections G2 and G3 of the BSC set out matters which the Panel will have regard to in considering what level of compensation is to be awarded, the calculations to be utilised in the Panel's considerations and a number of obligations regarding the compensation claims process. Section G3 also includes detailed algebra in respect of how the costs associated with the upheld claims would be recovered from the industry through Ad-Hoc Trading Charges.

The BSC states that it is only Parties that receive instructions from National Grid pursuant to the relevant Operating or Balancing Code that can submit a claim for payment of compensation after a Black Start event.

During a Black Start Period, a single imbalance price shall apply to all Parties. In the example of a Generator, if their true costs of generating (as was instructed to generate by National Grid) were greater than the amount received through the "single imbalance cash out price x metered volume calculation", the Generator could claim back the difference (Avoidable Costs – minus the amount the Generator received from the "single imbalance price x metered volume" calculation) through the compensation claims process.

Avoidable Costs are (subject to Section G 3.2) the amount, determined by the Panel as being (in its opinion), the net costs of operating a BM Unit which arise as a consequence of the relevant changes in Exports and/or Imports during a Settlement Period in a Black Start Period. Therefore if the Generators Avoidable Costs exceeded their income they can claim for compensation, but if their income exceeded their Avoidable Costs they cannot claim for compensation.

2.1.2 Fuel Security Claims Process

Section G5 of the BSC allows Generators to claim for Exceptional Costs incurred as a result of the Generator responding to a FSC direction. All claims from Generators will be handled by the BSC Panel who will specify the format in which they wish the claim applications to be submitted. The BSC Panel may also require that the Party making the claim provide such additional information or explanation (and provide such other assistance) as the BSC Panel deems necessary in order for them to assess the claim from the Generator. An Auditors' statement may also be asked for from claimants by the BSC Panel. For the avoidance of doubt the BSC Panel may validate each element of each Generator's claim as it sees fit.

The Panel is required to determine whether:

1. The Generator has incurred Exceptional Costs in carrying on its Generation Business as a result of a direction or directions given by the Secretary of State (whether in anticipation of or during a Security Period) under section 34 or section 35 of the Act; and
2. The Generator should receive compensation in respect of those Exceptional Costs:
 - In the sum specified by the Generator in accordance with paragraph 5.4.1 of the BSC; or
 - In such other sum as the Panel deems appropriate.

All claims from Generators should be paid as quickly as is practicable after the claims have been validated by the BSC Panel. These costs should be recovered from Supplier Trading Parties in a manner determined by the Authority.

2.1.3 Current Issues

- Although the BSC explicitly states that claims for compensation resulting from FSC directions can only be made by Generators, it is unclear whether both Lead Parties of BM Units for Production and Consumption can apply for compensation in relation to Black Start events;
- There is a difference between what can be claimed under the BSC for Avoidable Costs for a Black Start and what can be claimed under the FSC for Exceptional Costs after a FSC event, so consideration should be given to what should and should not be included in Avoidable Costs;
- The BSC currently states that Avoidable costs can only be claimed in relation to changes in Imports and Exports. The Issue 32 and Issue 33 Groups believed that warm up or stand by costs should be included within Avoidable Costs;
- A claim associated with a Black Start Instruction (BSI) must be made within 20 working days starting from the end of the Black Start period and a claim associated with a FSC event must be made within 60 business days. The Issue 32 and Issue 33 Groups believed that this does not provide BSC Parties with sufficient time to collate all relevant documentation. Therefore additional time should be allocated to relevant parties who wish to submit further evidence to support their claims;
- The Issue 33 Group highlighted issues associated with cost recovery and suggested that a BSC funding shares methodology would be the most accurate means of establishing charges (should Ofgem decide that cost recovery be managed under the BSC).
- There is no detailed process for how a claim will be progressed, however the Issue Group developed the concept and basic model for a Claims Committee.

2.2 Single Imbalance Cash-Out Price

2.2.1 Current Process

Section G3.2.1 (d) of the BSC states that for all Settlement Periods which fall within a Black Start Period, a single imbalance price shall apply in accordance with Section T1.6. In addition Section G4.2 states that the Secretary of State may direct the application of a single imbalance price in relation to Settlement Periods affected by FSC directions (in accordance with Section T1.6).

2.2.2 Current Issues

Section T1.6 of the BSC provides high-level provisions as to how the single imbalance cash-out price should be determined by the Panel, but does not specify a methodology for deriving the exact value of the price. In practice it would be very difficult for the BSC Panel to convene during the initial period of a Black Start event and therefore determine the price. It should be noted that the single imbalance price would only be required post-event and would be subject to approval by the Authority.

3 PROPOSED CHANGES/REFINEMENTS

Based upon discussions highlighted during the Issues 32 and 33 Group meetings the following proposed changes/refinements were raised:

- A Claims Committee shall be established in order to facilitate claims arising from a Black Start or FSC event;
- A high level process to be followed by the Claims Committee should be included in the BSC;
- The submission of a claim should be via a BSCP-type form, a new BSCP should be created to provide this form and any administrative details, which the Modification Group may suggest;

- It is proposed that a 'de minimis threshold' process be developed. The Claims Committee will determine all aspects of the 'de minimus' claims validation process (as well as the claim threshold amount).
- It is proposed that the Lead Party of a BM Unit should be able to seek compensation for any 'warm up' or 'hot standby' costs that were incurred pursuant to a BSI, even though this does not in itself constitute a change in Imports or Exports;
- It is proposed that Section T1.6 be expanded to include details about how the single imbalance price should be derived as follows:
 1. A single imbalance price should be derived by taking the mean of the System Sell Price (SSP) and System Buy Price (SBP) for a given Settlement Period over a predefined number of days (no contract notifications or Bids and Offers would be included).
 2. The default approach would be to use the data over the previous 30 Settlement Days. However, a Settlement Period (SP) that was subject to an FSC, Black Start event, or Emergency Instruction would not be used and would be replaced with another appropriate historical SP. Please see the Issue 32 report for proposed approaches.
 3. The Panel would determine an alternative pricing methodology if the Panel deemed it to be more appropriate.
- It shall be proposed that cost recovery be achieved via the funding shares methodology, and is carried out in each case over a period of time determined by the Authority and depending on the amount to be recovered;

4 TERMS OF REFERENCE

An initial assessment of P232 has identified the following areas which the BSCCo recommends should be considered further during the progression of the Modification Proposal (based on the Issue 32/33 conclusions):

- Confirm what further detail is required regarding the compensation arrangements pursuant to a Black Start or FSC event, and where this detail should be documented including:
 - What the de-minis threshold should be;
 - The timetable for submission of claims and admission of further evidence;
 - The timetable and process for progression of claims;
 - The treatment of interim claims; and
 - The publication of claims material and compensation decisions.
- Confirm the process for cost recovery under the BSC;
- Identify the impacts on BSC Parties, BSC Panel, BSCCo and the Transmission Company;
- Detail the formulation and composition of the Claims Committee;
- Confirm the further detail of the calculation of a single Imbalance Price;
- Determine whether additional procedures introduced by P232 will necessitate the development of a new BSCP to facilitate the proposed claims process; and

- Determine which costs should constitute Avoidable Costs (in terms of a Black Start) or Exceptional Costs (in terms of an FSC event).

It is not anticipated that there are any environmental impacts, therefore no assessment will be made. The Group should also be mindful of the conclusions arising from P231.

ELEXON has contacted DECC to invite them to participate in the Modification process.

5 RECOMMENDATIONS TO THE PANEL

As the areas for consideration are well defined, BSCCo recommends a 3 month Assessment Procedure for P232. This time will be used to further consider and consult upon the areas raised in this IWA. Additionally participants will be given a longer period to participate in both the impact assessment and consultation.

It is estimated that progression of P232 will require:

- 3 Modification Group meetings (2 of which will be used for finalising the procedures relevant to P232);
- 1 BSCCo impact assessment;
- 1 joint industry consultation and impact assessment by BSC Agents, BSCCo, Parties and Party Agents (which will run in parallel with the impact assessment for P232); and
- 1 request for Transmission Company analysis.

The proposed timetable and estimated costs for the progression of P232 are shown in Appendix 3.

BSCCo recommends that the P232 Modification Group be formed from members of the Settlement and Governance Standing Modification Groups (and should be the same Group that considers P231)

BSCCo recommends that the areas for consideration raised by this IWA should form the basis of the Modification Group Terms of Reference, along with any additional areas proposed by the Panel.

6 PROPOSED TIMETABLE AND ESTIMATED COSTS

The detailed timetable and costs associated with the progression of P232 can be found in Appendix 3.

7 TERMS USED IN THIS DOCUMENT

Other acronyms and defined terms take the meanings defined in Section X of the Code.

Acronym/Term	Definition
BERR	Department for Business Enterprise and Regulatory Reform
BMRS	Balancing Mechanism Reporting System
DECC	Department for Energy and Climate Change
FSC	Fuel Security Code
GSMG	Governance Standing Modification Group
SSMG	Settlement Standing Modification Group

8 REFERENCES

Ref.	Document Title	Owner	Issue Date	Version
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1	Issue 32 Black Start Report	ELEXON	10/07/2008	1.0
2	Issue 33 Fuel Security Code Report	ELEXON	10/07/2008	1.0

APPENDIX 1: MODIFICATION PROPOSAL

<h3>Modification Proposal – BSCP40/03</h3>	MP No: P232 <i>(mandatory by BSCCo)</i>
Title of Modification Proposal: Black Start and Fuel Security Compensation and Single Imbalance Price Derivation	
Submission Date: 23 December 2008	
<p>Description of Proposed Modification: The aim of this Modification Proposal is to improve transparency regarding the compensation arrangements pursuant to a Black Start or Fuel Security Code (FSC) period. Section G of the Balancing and Settlement Code (BSC) provides high level details of the compensation arrangements associated with a Black Start or FSC period, however, certain areas require further clarification.</p> <p>Based on the investigations carried out by the Issue groups 32 and 33, a number of conclusions were drawn, one of which was to put in place a more detailed process to recover relevant costs during a Black Start or Fuel Security event. This Modification aims to address this by outlining:</p> <ol style="list-style-type: none"> 1. The claims processes associated with a Black Start and Fuel Security period; and 2. The formulation of a single imbalance cash-out price in relation to a Black Start and Fuel Security Period. <p>The above mentioned points are described in further detail below:</p> <p>1. Compensation Arrangements Associated with a Black Start and Fuel Security Instruction</p> <p>With regards to a Black Start event, Section G3.3 of the BSC states that the Lead Party of a BM Unit who is given a Black Start Instruction (BSI) may submit a claim for compensation. This claim would be based on the Avoidable Costs of the Lead Party in relation to relevant changes in Exports and/or Imports. Section G2 sets out the types of cost that can be considered under a claim for Avoidable Costs.</p> <p>With regards to an FSC event, Section G5 of the BSC states that the Lead Party of a BM Unit who has been subject to an FSC direction may submit a claim for Exceptional Costs.</p> <p>Claims for Avoidable Costs and Exceptional Costs would both be assessed by the BSC Panel who would determine the amount of compensation the Lead Party should receive.</p> <p>It is proposed that:</p> <ul style="list-style-type: none"> • A Claims Committee shall be established in order to facilitate claims arising from a Black Start or FSC event. (For further clarity regarding the Claims Committee please see Attachment B – Issue 33: Claims Committee, Pg 10). • The high level process to be followed by the Claims Committee should be included in the BSC as developed by the Issue 33 Group (Attachment B – Issue 33: Claims Committee, Pg 15 & 16). <p>The BSC should reflect that:</p> <ul style="list-style-type: none"> • The submission of a claim should be via a BSCP-type form, a new BSCP should be created to provide this form and any administrative details, which the Modification Group may suggest; • As stated in the BSC, a claim arising from an FSC instruction must be made within 60 Business Days starting from the end of the FSC period, whilst a claim arising from a BSI must be made within 20 Working Days starting from the end of the Black Start period; and • An additional 60 Business Days will be allocated for submission of further evidence by a claimant arising from a FSC or Black Start event. 	

Modification Proposal – BSCP40/03	MP No: P232 <i>(mandatory by BSCCo)</i>
<p>2. Warm Up and Hot Standby Costs</p> <p>As highlighted above, the BSC states that claims for Avoidable Costs following a BSI must be in relation to relevant changes in Exports and/or Imports. It is proposed that additionally the Lead Party of a BM Unit should be able to seek compensation for any 'warm up' or 'hot standby' costs that were incurred pursuant to a BSI, even though this does not in itself constitute a change in Imports or Exports (For further clarity please see Attachment A – Issue 32 – Section 3.4.)</p>	
<p>3. Calculation of a Single Imbalance Price.</p> <p>Section G3.2.1 (d) states that for all Settlement Periods which fall within a Black Start Period, a single imbalance price shall apply in accordance with Section T1.6. In addition Section G4.2 states that the Secretary of State may direct the application of a single imbalance price in relation to Settlement Periods affected by FSC directions (in accordance with Section T1.6).</p> <p>Section T1.6 states that the BSC Panel shall determine the single imbalance price. It is therefore proposed that Section T1.6 be expanded to include details about how the single imbalance price should be derived as follows:</p> <ul style="list-style-type: none"> • A single imbalance price should be derived by taking the mean of the System Sell Price (SSP) and System Buy Price (SBP) for a given Settlement Period over a predefined number of days (no contract notifications or Bids and Offers would be included). • The default approach would be to use the data over the previous 30 Settlement Days. However, a Settlement Period (SP) that was subject to an FSC, Black Start event, or Emergency Instruction would not be used and would be replaced with another appropriate historical SP. Please see the issue 32 report for proposed approaches. • The Panel would determine an alternative pricing methodology if the Panel deemed it to be more appropriate (see Issue 32 report for other potential alternatives). 	
<p>Description of Issue or Defect that Modification Proposal Seeks to Address</p> <p>Section G of the BSC seeks to address various contingencies, and related provisions. In particular, paragraphs 3 and 4 focus on the issues of a Black Start and Fuel Security respectively. This modification seeks to improve the transparency of the BSC processes and procedures that would be associated with a Black Start or Fuel Security event.</p>	
<p>Impact on Code</p> <p>The proposed changes will have an impact on sections G and T of the BSC.</p>	
<p>Impact on Core Industry Documents or System Operator-Transmission Owner Code</p> <p>Potential impact on the Grid Code.</p>	
<p>Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties</p> <p>Potential impact on BSC Systems and Party Systems. Impact on Panel procedures</p>	
<p>Impact on other Configurable Items <i>(optional by originator)</i></p> <p>New BSCP to be created for the Claims process administration.</p>	

Modification Proposal – BSCP40/03	MP No: P232 (mandatory by BSCCo)
Justification for Proposed Modification with Reference to Applicable BSC Objectives	
<p>Clarifications/amendments to the Black Start and Fuel Security provisions would benefit the determination and financial settlement of obligations between parties and would bring about efficiencies in the administration and implementation of the BSC arrangements (objective (d)).</p> <p>The proposed changes are expected to have a positive impact on objective (b). Clarity regarding the Transmission Company's post-event obligations, will ensure that individual participants have a better understanding of Black Start and FSC procedures which could assist the Transmission Company to operate the Transmission System in an efficient manner.</p>	
Urgency Recommended:	
No	
Justification for Urgency Recommendation	
N/A	
Details of Proposer:	
<p>Name: <i>Shafqat Ali</i></p> <p>Organisation: <i>National Grid</i></p> <p>Telephone Number: <i>01926 655980</i></p> <p>Email Address: shafqat.r.ali@uk.ngrid.com</p>	
Details of Proposer's Representative:	
<p>Name: <i>Shafqat Ali</i></p> <p>Organisation: <i>National Grid</i></p> <p>Telephone Number: <i>01926 655980</i></p> <p>Email address: shafqat.r.ali@uk.ngrid.com</p>	
Details of Representative's Alternate:	
<p>Name: <i>Rob Smith</i></p> <p>Organisation: <i>National Grid.</i></p> <p>Telephone Number: <i>01926 654076</i></p> <p>Email address: robert.smith@uk.ngrid.com</p>	
Attachments: Yes	
<p>Attachment 1 - Issue 32 Black Start Report</p> <p>Attachment 2 - Report on Issue 33 'Fuel Security Code (FSC) Guidance'</p>	

Please find access to the Attachments via the hyperlink in the References section (8).

APPENDIX 2: INITIAL ASSESSMENT OF IMPACTS OF MODIFICATION PROPOSAL

An initial assessment has been undertaken by BSCCo in respect of all BSC systems, documentation and processes. The following have been identified as being potentially impacted by P232.

a) Impact on BSC Systems and Processes

No impact.

b) Impact on BSC Agent Contractual Arrangements

BSC Agent Contract	Potential Impact of Proposed Modification
LogicaCMG (FAA)	It is possible that the FAA could be used for recovery of costs from compensation claims (or this could be directly administered by ELEXON).

c) Impact on BSC Parties and Party Agents

BSC Parties will be required to familiarise themselves with the solution and assess any changes to their working processes, probably developing procedures for submitting claims.

d) Impact on Transmission Company

The Transmission Company will need to ensure the solution is consistent with its processes and obligations under the BSC and other Codes.

e) Impact on BSCCo

Area of Business	Potential Impact of Proposed Modification
Operational support	Support the operational processes during a Black Start and/or FSC period. This will require updates to, and potentially creation of a new, Local Working Instructions.
Change Implementation	Update to the BSC and potentially the creation of a new BSCP.

f) Impact on BSC Panel

The BSC Panel will be required to establish a claims committee to consider compensation claims.

g) Impact on Code

Code Section	Potential Impact of Proposed Modification
Section G	The BSC will need to be amended to include new obligations on: <ul style="list-style-type: none"> The BSC Panel; BSC Parties;

Code Section	Potential Impact of Proposed Modification
	<ul style="list-style-type: none"> • BSC Agents; • Interconnector users; • Transmission Company.
Section T	<ul style="list-style-type: none"> • The BSC will need to be amended to include the detailed process for calculating the single Imbalance Price.

h) Impact on Code Subsidiary Documents

A new BSCP may need to be created to outline the procedures relating to the duration of a Black Start / FSC event, and the return to normal market operations.

i) Impact on Core Industry Documents and Other Documents

Document	Potential Impact of Proposed Modification
Grid Code	Operating Code 9 may require amendments to reflect the solution.

j) Impact on Other Configurable Items

No impact.

k) Impact on BSCCo Memorandum and Articles of Association

No impact.

l) Impact on Governance and Regulatory Framework

No impact.

APPENDIX 3: COSTS AND TIMETABLE FOR PROGRESSION**ESTIMATED COSTS OF PROGRESSING MODIFICATION PROPOSAL⁵**

Meeting Cost	£1,500
Legal/Expert Cost	£0
Impact Assessment Cost	£ 5,000
ELEXON Resource	96 man days £24,660

⁵ Clarification of the meanings of the cost terms in this appendix can be found on the BSC Website at the following link:
http://www.elexon.co.uk/documents/Change_and_Implementation/Modifications_Process_-_Related_Documents/Clarification_of_Costs_in_Modification_Procedure_Reports.pdf

Initial Timetable for Progression of P232 (note that the dates of Modification Group meetings are indicative)

ID	Task Name	Duration	Start	Finish	Timeline														
					01 February			01 March		01 April									
					12/01	26/01	09/02	23/02	09/03	23/03	06/04								
1	IWA presented to Panel	0 days	Thu 15/01/09	Thu 15/01/09	◆	◆													
2	MG meeting 1	1 day	Wed 21/01/09	Wed 21/01/09		◆													
3	MG meeting 2	1 day	Thu 29/01/09	Thu 29/01/09			◆												
4	Start drafting Legal text	10 days	Fri 30/01/09	Thu 12/02/09				■											
5	Draft Requirements Specification and Consultation	5 days	Fri 30/01/09	Thu 05/02/09				■											
6	Group review Requirements Specification and Consultation	5 days	Fri 06/02/09	Thu 12/02/09					■										
7	Update Requirements Specification with comments	2 days	Fri 13/02/09	Mon 16/02/09						■									
8	Conduct Impact Assessment and Consultation	10 days	Tue 17/02/09	Mon 02/03/09							■								
9	Collate responses and forward onto Group	4 days	Tue 03/03/09	Fri 06/03/09								■							
10	MG Meeting 3	1 day	Tue 10/03/09	Tue 10/03/09									◆						
11	Update Legal text	2 days	Wed 11/03/09	Thu 12/03/09										■					
12	Draft Assessment Report	4 days	Wed 11/03/09	Mon 16/03/09											■				
13	Group to review Assessment Report	5 days	Tue 17/03/09	Mon 23/03/09												■			
14	Update Assessment Report	2 days	Tue 24/03/09	Wed 25/03/09													■		
15	Internal Paper day	0 days	Wed 01/04/09	Wed 01/04/09														◆	
16	External Paper day	0 days	Fri 03/04/09	Fri 03/04/09															◆
17	Assessment Report presented to Panel	0 days	Thu 09/04/09	Thu 09/04/09															◆

APPENDIX 4: LEGAL REQUIREMENTS MATRIX

1. Compensation Arrangements Associated with a Black Start and Fuel Security Instruction

Ref	Requirement	Impact on Code	BSCPs	FSC
1	The insertion of a requirement for a Claims Committee to be established in order to facilitate claims arising from a Black Start Period or Fuel Security Period.	Section G	Detailed in a new 'Contingencies' BSCP	None
2	The insertion of text to state that in relation to a Black Start event, Parties can claim Avoidable Costs for Warm up and Hot Standby	Section G	None	None
3	The insertion of text to detail the process for calculating a single imbalance price as set out in the modification.	Section T1.6	None	None