Stage 04: Final Modification Report

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Self-Governance Modification: appeal deadline 3 January 2012

P279: Correcting the BSC description of the CDCA to SVAA interface for GSP Group net Export

This Modification corrects a self evident error in the Code provisions relating to the CDCA to SVAA interface. It corrects the Code provisions so that their application facilitates the delivery of accurate Settlement where there is Export by a GSP Group.

The Panel:

Approved P279 Proposed Modification for implementation 5 Working Days following approval (following the appeals window)

Low Impact:

ELEXON

190/04

P279
Final Modification Report

14 December 2011

Version 1.0

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About this document:

This is the P279 Self-Governance Modification Report. ELEXON submitted this report to Ofgem and the Transmission Company, and copied it to all BSC Parties and BSC Panel Members.

P279 is a Self-Governance Modification, so it did not go to the Authority for decision. The Panel approved P279 for implementation 5 Working Days following approval (and following the Self-Governance appeals window, i.e. implementation on 10 January 2012). In accordance with Section F6.4 of the BSC, Parties have until 3 January 2012 (15 Working Days from the decision date) to appeal the Panel's decision to the Authority.

Any questions?

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1 Summary

Why Change?

Code provisions relating the data interface between the Central Data Collection Agent (CDCA) and Supplier Volume Allocation Agent (SVAA) do not require that CDCA systems treat GSP Group Export as a negative value. This self evident error could cause uncertainty among Parties as to how the BSC systems should operate. Addressing the error clearly aligns the provisions of the Code with the promotion of accurate Settlement in relation to Export by GSP Groups.

Solution

Amend Section R of the Code to clearly require that when data is sent from the CDCA to the SVAA an Export from a GSP Group must have a negative value.

Impacts & Costs

P279 is a Code only change. It has no affect on ELEXON's activities, BSC Parties and Party Agents, BSC Systems and process, Code Subsidiary Documents or contractual arrangements with service providers.

Implementation

P279 requires only minimal changes to the Code and will be implemented on 10 January 2012 (5 Working Days after the Self-Governance appeals window closes on 3 January 2012).

The Case for Change

The Panel believes that P279 better facilitates the achievement of BSC Objective (d) and considers that it is self evident that removing a clear error from the Code promotes efficiency in the BSC arrangements.

Self-Governance

The Panel unanimously agree that P279 meets the Self-Governance Criteria. Ofgem has confirmed that it does not object to this.

Decision

The Panel unanimously approved P279.

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2 Why Change?

Background

The Panel raised Issue 38, 'Potential Improvements to Credit Checking Rules to Support High Levels of Embedded Generation in North Scotland', in October 2009 to consider whether BSC processes would operate appropriately for Grid Supply Point (GSP) Groups with high levels of embedded generation.

The Issue 38 Group investigated a number of issues associated with increased levels of embedded generation. The Issue 38 Report of 10 December 2009 recommended that Modification Proposals should be raised to address three of the issues considered.

This Modification Proposal relates to one of these three issues, 'Issue 4: BSC description of interface from Central Data Collection Agent (CDCA) to Supplier Volume Allocation Agent (SVAA)'. A summary of previous Modifications relating to the two other recommended changes can be found in 'Related changes', below.

Issue 38

Issue 38 identified that the description of the interface between the CDCA and SVAA in section R5.7.1 (b) of the Code is not suitable where a GSP Group Exports.

Generally, under the Code, flows of energy onto the Transmission System (Exports) are positive and flows of energy from the Transmission System (Imports) are negative. However, the Code recognises that data sent from the CDCA to the SVAA uses the opposite sign convention to maintain consistency with the operation of pre-existing SVAA software, i.e. for the purposes of the CDCA/SVAA interface Imports are positive values.

The Issue 38 Group considered that the reference to 'magnitude' in R5.7.1 implies that the provisions consider that a GSP Group will always Import. This is because, considered in the context of other Code provisions, the term 'magnitude' implies that the value being transferred from the CDCA will always be a positive value (which corresponds to Import). The Issue 38 Group concluded that the use of the term 'magnitude' is therefore incorrect because GSP Groups can Export. It should be noted that at the time of the Issue 38 Report no GSP Group had actually produced a net Export, but Export by a GSP Group has since occurred.

The Issue 38 Group was advised that the BSC Systems were capable of correct operation with respect to Export by a GSP Group. Export by a GSP Group since the Issue 38 Group made its report has shown this to be incorrect (see below) due to a defect in the CDCA software, but we do not believe this invalidates the Issue 38 Group's conclusions.

The Issue 38 Group recommended that a Modification Proposal should be raised on the grounds of efficiency to amend R5.7.1 (b) to make the requirement robust with respect to Exports (and aligned with way BSC Systems were, at that time, understood to operate). The draft legal text in Attachment A is based on the Issue 38 Group's recommended amendment to R5.7.1 (b).

Since the recommended change was a Code-only change, and understood to have no practical impact, it was agreed to be progressed when opportune. This has been our usual approach for minor amendments, intended to maximise the efficiency of their progression.

Why is Issue 38 relevant?

The Issue 38 Report recommended in 2009 that the Code should be changed to correct a self evident error.

Due to recent operational issues we believe the recommended change should be made now, to ensure the CDCA/ SVAA interface is consistent with accurate Settlement and to clarify how CDCA systems should operate.

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Export by a GSP Group in practice

In early September 2011 three Settlement Periods occurred in which, for the first time, a GSP Group had an Export associated with it. The CDCA systems did not operate as anticipated, and reported the volumes to the SVAA as positive values (indicating Import) instead of negative values (indicating Export).

The positive volume reported by the CDCA affected the GSP Group Correction process in SVAA, causing it to calculate metered volumes for each Supplier in the GSP Group that did not sum to the correct total volume of energy of the GSP Group. This discrepancy caused SAA to reject the Supplier metered volumes calculated by SVAA. As a short term measure the SAA validation tolerance was increased so the BSC processes could proceed.

Magnitude of CDCA software defect

Increasing the SAA tolerance enabled the volumes to be accepted by the SAA, but the discrepancy in volumes remained in Settlement. Effectively the CDCA reported the Export as an equal and opposite Import. This volume is shared amongst Suppliers in the affected GSP Group in proportion to their NHH demand, increasing the amount of demand allocated to them in that GSP Group; this increases their exposure to Imbalance Charges. Conversely, other Parties' Imbalance Charges are reduced by a decrease in the Transmission Losses assigned to them.

The volume associated with the CDCA system defect over the three affected Settlement Periods is 50.5MWh. Approximately 40MWh of this is associated with a single Party, equating to around a £1,500 ex VAT cost spread over the three Settlement Periods. The remaining volume (i.e. 10MWh) is spread primarily across three other Parties. The corresponding benefit of the discrepancy is spread across Parties through a reduction in their Transmission Losses.

Addressing the CDCA software defect

Addressing the identified CDCA software defect is not part of P279. As it is a defect in the systems managed by our Service Providers we are pursuing a resolution of the issue outside the BSC Change Process.

When the software issue was identified an ELEXON circular was issued to appraise industry participants. We will communicate to the industry any significant matters regarding this issue or its resolution.

The issue

The issue that this Modification Proposal seeks to address is that the relevant Code provisions that relate to the CDCA/SVAA data interface do not unambiguously require that CDCA systems treat GSP Group Export as a negative value. The provisions are unclear and refer to 'magnitude' (R5.7.1 (b)) which, when considered in the context of other BSC provisions, implies that both GSP Group Imports and Exports should be treated as positive values.

In the context of the issues with the CDCA systems caused by a software defect, this self evident error in the Code could cause uncertainty among Parties as to how the BSC systems should operate. Addressing the error will clearly align the provisions of the Code with the promotion of accurate Settlement in relation to Export by GSP Groups.

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Related changes

No BSC changes directly relate to or interact with P279, but the following information may be useful as background.

Previous Modifications relating to Issue 38

Beside Issue 4, to which this Modification Proposal relates, the Issue 38 Report concluded that Modifications should be progressed in relation to two other areas:

- Issue 1: Reduced accuracy of the Credit Checking Process; and
- Issue 2: GSP Group treated as Production.

At ELEXON's request the Panel raised Modification Proposal P253, 'Improving the accuracy of the credit calculation for SVA participants' to address Issue 1. P253 was approved by the Authority in November 2010 for implementation on 3 November 2011.

Approved Modification P269, 'Prevention of Base Trading Unit BMUs' Account Status Flipping from Consumption to Production', relates to Issue 2 and was raised by SmartestEnergy on 3 February 2011. P269 will be implemented on 23 February 2012.

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3 Solution

Proposed solution

This Modification proposes to amend the Code such that it clearly requires that when data is sent from the CDCA to the SVAA an Export from a GSP Group must have a negative value. This would be achieved by amending Section R of the Code as set out in the draft legal text in Attachment A.

The attached legal text includes proposed clarifications which do not change the P279 solution. We recommend that these amendments are made to address comments received in a response to, and in discussions following, the P279 Report Phase Consultation. The comments and an explanation of the amendments are set out in the section 'Report Phase Consultation Responses', below.

The BSC section affected by P279 was impacted by the November BSC Release, which was implemented on 3 November 2011. The P279 Report Phase consultation spanned this date. Though there was no direct interaction between the November Release changes and the changes proposed by P279 we issued the legal text with the November Release changes included and highlighted as we believed this was the clearest and most transparent way to present the proposed P279 changes to participants. The legal text in Attachment A shows changes to version 12 of Section R, which is the current live baseline.

4 Impacts & Costs

Implementation Costs

Estimated Implementation Costs	
ELEXON effort	1 man day, equating to approximately £240
Service Provider	Zero
Total	£240

Impacts

The Proposed Solution is a Code only change, and would amend the BSC as set out in the draft legal text in Attachment A. Its implementation would have no affect on ELEXON's activities, BSC Parties and Party Agents, BSC Systems and process, Code Subsidiary Documents or the contractual arrangements with our service providers.

Impact on Code	
Code section	Potential impact
Section R: Collection and Aggregation of Meter Data from CVA Metering Systems	Amend such that R5.7.1 requires the CDCA to report a positive or negative value for GSP Group Take.

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5 Implementation

Implementation Approach

Implementation of the Proposed Modification would require only minimal changes to the Code. P279 will be implemented 5 Working Days after approval by the Panel under the Self-Governance arrangements (following the Self-Governance appeals window of 15 Working Days). Implementation would be on a prospective basis.

6 The Case for Change

Justification against the Applicable BSC Objectives

The Panel believes that P279 better facilitates the achievement of BSC Objective (d), 'Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'.

The Panel believes it is self evident that removing a clear error from the Code promotes efficiency in the BSC arrangements by ensuring that the practical intent of the BSC is clearly reflected and can be given effect, and that the provisions of the BSC unambiguously promote accurate Settlement.

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7 Initial Panel Discussions

Direct to Report Phase

F2.2.4 of the Code states that the Panel may progress a Modification straight to the Report Phase if the Panel's recommendation on the Modification would generally be considered to be self evident.

The Panel noted that the Issue 38 Group had concluded that the current Code provisions relating to the CDCA/SVAA interface are not robust with respect to Export by GSP Groups and should be amended to correct this oversight.

The Panel unanimously agreed that P279 should proceed directly to the Report Phase. All Panel members believe it is self evident that applying the relevant Code provisions in practice will have an adverse effect on Settlement since it would lead to Export volumes being reported by the CDCA as an equal and opposite Import. This would impact Parties' exposure to Imbalance Charges.

Self-Governance

The Panel unanimously agreed that P279 meets the Self-Governance Criteria set out in Annex X-1 of the Code, and therefore agreed that it should progress as a Self-Governance Modification Proposal.

The proposed change to the Code addresses a known discrepancy which is accepted to have no practical impact and the proposed change to CDCA systems would bring those systems into line with how they were understood, until recently, to operate.

The Modification addresses a known, self evident error in the Code and preserves the accepted status quo in terms of BSC systems operation; it therefore has no material impact on consumers, competition, Transmission System operation, wider market/network management issues or Code procedures, and does not discriminate between different classes of Parties.

We have submitted to the Authority, on the Panel's behalf, a Self-Governance Statement detailing why the Panel believes P279 satisfies the Self-Governance Criteria and noting that the Panel intends to decide whether to approve Proposed Modification P279 at its meeting on 8 December 2011.

As part of the P279 Report Phase consultation the Panel invited the views of industry participants regarding the progression of P279 as a Self-Governance Modification.

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8 Report Phase Consultation Responses

The full responses to the P279 Report Phase Consultation are available on the P279 page of the ELEXON website. We received three responses, as summarised in the table below. All respondents agreed with the Panel's initial view that P279 should be approved and that it should be progressed as a Self Governance Modification. None of the respondents disagreed with the proposed legal text, but one respondent had comments on the legal text. The comments received and ELEXON's responses, details of subsequent discussions with the respondent and proposed amendments to the legal text issued for consultation are set out below.

Summary of P279 Report Phase Consultation responses

Question		Response
1.	Do you agree with the Panel's view that the Proposed Modification should be approved?	Yes: 3 No: 0
2.	Do you agree that the draft legal text delivers the intention of P279?	Yes: 2 No: 0 Other: 1
3.	Do you agree with the Panel's suggested Implementation Date?	Yes: 3 No: 0
4.	Do you agree with the Panel's view that P279 should be progressed as a Self-Governance Modification Proposal?	Yes: 3 No: 0
5.	Do you have any further comments on P279?	Yes: 1 No: 2

All respondents agreed the Proposed Modification would rectify a self evident error in the BSC. They also unanimously supported the proposed implementation of P279 because they believed it should be implemented as soon as is practical since it corrects a self evident error and has no material impact.

Respondents unanimously agreed that P279 was suitable for consideration as a Self Governance Modification Proposal because it corrects a self evident error in the BSC and has minimal practical impact.

Legal Text

Two respondents agreed with the draft legal text issued for consultation, with no further comment. One respondent, EDF Energy, believed the proposed change would reflect the correct provision of GSP Group Take information from CDCA to the SVAA, but was concerned that apparent inconsistency with other Code provisions could lead to further misunderstanding.

EDF Energy noted that the normal BSC convention is to consider energy flows to the Total System (including distribution) as Export (positive) and energy flows from the Total System as Import (negative). They suggested that this may cause misunderstanding due to the different convention in the Supplier Volume Allocation arrangements of Section S, and in consideration of distribution boundary flows. They note that in Section S flows are usually unsigned, with Export and Import processed separately in all but final summations, where Export from user sites to distribution is subtracted (i.e. considered negative, the opposite sign convention to that used elsewhere in the BSC), and GSP Group Take is considered to be normally positive. EDF Energy considers that the error identified by P279 is one potential area of misunderstanding, but that there may be other areas of possible confusion.

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We agree with most of EDF Energy's comments, but believe that only one is relevant to P279. The cause of the issues identified is that BSC Systems use two different (opposite) sign conventions for GSP Group Take:

- Treats Import as positive and Export as negative: this convention is used within SVAA systems and processes and when transferring data between CDCA and SVAA. It arose from the Electricity Pool's 1998 Programme.
- Treat Export as positive and Import as negative: this convention is used within CDCA systems and processes. It arose from the NETA Programme.

One of the implications of this is that when providing data to SVAA, the CDCA has to convert from its own sign convention to the SVAA's opposite sign convention. We believe that the respondent is concerned because the proposed text does not make this clear.

EDF Energy's specific comments are set out in the table below, with ELEXON's responses.

Summary of P279 Report Phase Consultation responses		
EDF Energy comment		ELEXON response
1.	The calculation of GSP Group Correction in Section S-2 9.2.1 clearly expects a normally positive value of GSP Group Take.	Agree that the S-2, 9.2.1 calculation assumes a normally positive value of GSP Group Take, but do not consider that this is relevant to P279, and therefore **no change is recommended**.
2.	Section X-2 section 2.4.2 concerning sign conventions makes a special exception for GSP Group Take, stating that it "shall, for the avoidance of doubt, be positive, negative or zero as determined in accordance with the algebraic determination of such variable pursuant to the Code."	Agree that X-2, 2.4.2 specifically carves out GSP Group Take as something that may not follow usual sign conventions (to allow for different sign conventions to be used), but do not consider that this is relevant to P279, and therefore **no change is recommended**.
3.	The definition of GSP Group Take in Section X-2 Table X-2 is only rational if GSP Group Take is to be considered normally as a negative quantity, for which subtraction of the magnitude of CVA exports makes it more negative, i.e. increases the SVA demand. This would require GSP Group Volume determined by CDCA (the flow at the distribution-transmission boundary) to normally be negative. Perhaps a clarification should be added to this definition to indicate that for the purposes of CDCA (CVA) calculations a flow from transmission to distribution is considered negative and the reverse flow is positive (as written), while for the purposes of SVAA calculations, the signs are reversed.	Agree that the definition in Table X-2 is based on the premise that GSP Group Take is normally negative, i.e. it describes the CDCA sign convention rather than the SVAA sign convention (because Table X-2 doesn't apply to Section S, and this definition was therefore intended to apply to CDCA rather than SVAA). **Propose amending the draft legal text** to clarify that two different sign conventions are in use, as detailed below.
4.	The definition of GSP Group Take in Section X-2 Table X-6 refers only to a number, hinting at an unsigned value rather than a signed value (consistent with current R5.7.1). Perhaps this definition	Do not agree that 'number' implies an unsigned value whereas 'value' implies a signed value, and therefore **no change is recommended**.

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	should also be changed to refer to "value".	
5.	Section S-2, Section 10.1.2 says that the SVAA "shall use the relevant value of GSP Group Take (GSPGTHj) which is derived from the corresponding Volume Allocation Run provided by the CDCA in accordance with Section R5.7". Note that it refers to a value "derived from" and not necessarily the actual value provided.	Agree that S-2 10.1.2 gives SVAA some freedom to 'derive' a value, but do not consider that this is relevant to P279, and therefore **no change is recommended**.

Clarification of sign conventions

We recommend that the P279 legal text should be amended to clarify that two different sign conventions are in use. This would be done by adding the words 'notwithstanding that this is the opposite sign convention to that used in Table X-2 of Annex X-2.' to the new paragraph 5.7.2 which P279 will introduce. EDF Energy confirmed that this amendment is acceptable.

Refinement of criteria for CDCA value to be positive or negative

In discussions with ELEXON following the P279 consultation, EDF Energy also noted that they believe that the criteria in new paragraph 5.7.2 for the value submitted by the CDCA to be either positive or negative should be clarified. As drafted for consultation the legal text specified that the value would be positive or negative based on whether the GSP Group is a net importer or net exporter.

EDF Energy believes that the reference to GSP Group could be misleading as it might be considered to imply a relation to boundary point metering, where a flow into a Distribution System is defined as an export. This would conflict with the P279 solution, since for the purposes of P279 a flow into a Distribution System is considered an import. EDF Energy suggested that the scope for misunderstanding could be reduced by amending the provisions to refer to Group Take of the relevant Distribution System(s), rather than GSP Group.

They also believe that it should be made explicit that the P279 criteria apply to a Settlement Period, thus avoiding any potential misunderstanding that netting is over some other period. EDF Energy therefore proposed that 5.7.2 should be amended so the criteria for the CDCA's value to be positive or negative based on whether the GSP Group Take represents a net import into, or a net export from, the relevant Distribution System(s) in a Settlement Period.

ELEXON agrees that the suggested amendments would clarify the criteria in 5.7.2. We note that the classification of flows at a GSP as 'import' or 'export' under the BSC is not clear, and therefore believe that EDF Energy's suggestion would clarify and better define the provisions in the new paragraph 5.7.2. The suggested new wording is therefore reflected in 5.7.2 (a) and 5.7.2 (b) of the attached legal text.

Impact on P279 Proposed Solution

ELEXON does not believe that either amendment changes the P279 solution, since both simply add clarification to the proposed P279 solution. The draft legal text in Attachment A includes both proposed further amendments.

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Consideration of Report Phase Consultation responses

The Panel noted the relatively small number of responses received to the P279 Report Phase Consultation. This is perhaps understandable since P279 has minimal practical impact on Parties (hence the application of Self-Governance). The responses that were received were in accord, and the Panel acknowledged that it was evident that one respondent had thoroughly reviewed, and provided comment on, the P279 legal text.

The Panel noted the unanimous support from the consultation respondents for the approval of P279 for the reasons put forward by the Panel, the suggested implementation approach, and the treatment of P279 as a Self-Governance Modification.

The Panel noted the amendments to the legal text proposed following ELEXON's discussions with the consultation respondent who commented on the drafting issued for consultation. The Panel agreed that the amendments would clarify the P279 changes without affecting the proposed solution, and agreed that the P279 legal text should be updated with the suggested amendments.

Though not directly related to P279, a Panel member queried whether it was possible that other issues could arise as a result of Export by GSP Groups. However, the Panel noted that no further issues had yet arisen as a result of the recent occurrence of the first (and so far only) instances of GSP Group Export, and also acknowledged that possible implications of GSP Group Export had been thoroughly considered under Issue 38.

Estimated progression costs

The Panel noted the minimal implementation impact of P279, and requested that estimates of the costs of progressing P279 through the Modification process be included in the Final Modification Report. Cost estimates based on the anticipated progression activities were included in the P279 IWA, and these have been updated to reflect the actual activities associated with P279 progression.

Estimated progression costs	
ELEXON resource	4 man days, equating to approximately £960

The ELEXON resource cost is an estimate of how much time and effort it took us to progress P270 through the Report Phase. The resource is minimal since the only activities were considering consultation responses and updating the Draft Modification Report for the Panel's consideration. However, we estimate that the resource utilised was slightly greater than predicted at the IWA stage (3 man days) due to the consideration of detailed comments on the legal text and development of legal text amendments to address issues raised.

We have also estimated the cost incurred by the industry in responding to the P279 Report Phase consultation. At the IWA stage we speculated that we might receive eight responses, and received three in practice.

Estimate of industry assessment costs

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Consultation response support	Est #con	Est #resp	Est effort	Est rate	Total
	1	3	2.5	605	**£4,540**

The consultation costs are estimated based on the industry responses to the Report Phase consultation and the approximate time and effort it is thought that Parties are likely to have spent on responses. We received three responses to the consultations (compared with a prediction of eight in the IWA) and assume each response required 2.5 man days of effort. A standard rate of £605 per man day is applied.

Conclusions

With no objection received from the Authority, the Panel unanimously agreed that P279 proceed as a Self-Governance Modification. The Panel unanimously agreed both the P279 legal text (with the suggested clarifying amendments) and that P279 be approved for implementation five Working Days after the deadline for Self-Governance appeals.

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10 Panel Decisions

The Panel:

- **NOTED** the P279 Draft Modification Report and the Report Phase consultation responses;
- **DETERMINED** (in the absence of any Authority direction) that P279 is a Self-Governance Modification Proposal;
- **APPROVED** P279 with an Implementation date of 5 Working Days following approval of P279 and the Self-Governance appeals window[1] (i.e. 10 January 2012);
- **APPROVED** the legal text for Proposed Modification P279;
- **NOTED** that, in accordance with Section F6 of the Code, ELEXON will:
  - Notify the Authority, Transmission Company and Parties of the Panel's decision on the same day as the Panel meeting;
  - Finalise the P279 Self-Governance Report[2], submit it to the Authority, and copy it to Parties and Panel Members within 3 Working Days; and
  - Copy the Transmission Company's notice to modify the Code to Parties, Panel Members, the Authority and the other interested Parties specified in F1.1.2(b);
- **NOTED** that the appeal window for P279 will close 15 Working Days after ELEXON's notification of the Panel's decision (i.e. on 3 January 2012);
- **NOTED** that, if no appeal is raised, P279 will be implemented in accordance with the Panel's determination; and
- **NOTED** that, if an appeal is raised in accordance with F6.4.2 and F6.4.10, the Authority will consider the appeal in accordance with the process set out in Section F6.4.

Decision

The Panel unanimously approved P279.

11 Further Information

More information is available in:

Attachment A: Legal Text Proposed

All consultation responses and other P279 documentation are available from the P279 page of the ELEXON website.

[1] A Self-Governance Modification may be appealed within 15 Working Days.
[2] This Draft Modification Report, updated with the Panel's final discussions and decisions, will form the Self-Governance Report.

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