



MODIFICATION REPORT for Modification Proposal P192

Change of Name of the Transmission Company

Prepared by: ELEXON on behalf of the Balancing and Settlement Code Panel (the 'Panel')

Date of issue: 13 September 2005 **Document reference:** P192MR10
Reason for issue: For Authority Decision **Issue/Version number:** Final/1.0

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RECOMMENDATIONS

Having considered and taken into due account the contents of draft P192 Modification Report, the Balancing and Settlement Code Panel recommends:

- **that Proposed Modification P192 should be made;**
- **the P192 Implementation Date of, 5 Working Days after an Authority decision; and**
- **the proposed text for modifying the Code, as set out in the Modification Report.**

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¹ The current version of the Balancing and Settlement Code (the 'Code') can be found at <http://www.elexon.co.uk/bscrelateddocs/BSC/default.aspx>

CONTENTS TABLE

Recommendations	1
Summary of Impacted Parties and Documents	3
1 Description of Proposed Modification and Assessment Against the Applicable BSC Objectives	4
1.1 Modification Proposal	4
1.2 Proposed Modification	4
1.3 Issues Raised by the Proposed Modification	4
1.4 Assessment of how the Proposed Modification will Better Facilitate the Applicable BSC Objectives	4
1.5 Alternative Modification	5
1.6 Governance and Regulatory Framework Assessment	5
2 Costs	5
3 Rationale for Panel’s Recommendations	5
4 Impact on BSC Systems and Parties	5
4.1 BSCCo	6
5 Impact on Code and Documentation	6
5.1 Balancing and Settlement Code.....	6
5.2 Code Subsidiary Documents and Configurable Items	6
5.3 BSCCo Memorandum and Articles of Association	7
5.4 Impact on Core Industry Documents and Supporting Arrangements.....	7
6 Summary of Consultations.....	7
7 Summary of Transmission Company Analysis	8
7.1 Analysis.....	8
8 Summary of External Advice.....	8
9 Implementation Approach	8
10 Document Control	8
10.1 Authorities	8
10.2 References	8
Annex 1 Legal Text.....	9
Annex 2 Initial Written Assessment Report	9
Annex 3 Transmission Company Analysis.....	9
Annex 4 Clarification of Costs	9
Annex 5 Consultation Responses	9

SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

The following parties/documents have been identified as being potentially impacted by Modification Proposal P192.

Parties	Sections of the BSC	Code Subsidiary Documents
Suppliers <input type="checkbox"/>	A <input type="checkbox"/>	BSC Procedures <input checked="" type="checkbox"/>
Generators <input type="checkbox"/>	B <input type="checkbox"/>	Codes of Practice <input checked="" type="checkbox"/>
Licence Exemptable Generators <input type="checkbox"/>	C <input type="checkbox"/>	BSC Service Descriptions <input checked="" type="checkbox"/>
Transmission Company <input checked="" type="checkbox"/>	D <input type="checkbox"/>	Service Lines <input checked="" type="checkbox"/>
Interconnector <input type="checkbox"/>	E <input type="checkbox"/>	Data Catalogues <input checked="" type="checkbox"/>
Distribution System Operators <input type="checkbox"/>	F <input type="checkbox"/>	Communication Requirements Documents <input type="checkbox"/>
Non-Physical Traders <input type="checkbox"/>	G <input type="checkbox"/>	Reporting Catalogue <input checked="" type="checkbox"/>
Party Agents	H <input type="checkbox"/>	MIDS <input type="checkbox"/>
Data Aggregators <input type="checkbox"/>	I <input type="checkbox"/>	Core Industry Documents
Data Collectors <input type="checkbox"/>	J <input type="checkbox"/>	Grid Code <input type="checkbox"/>
Meter Operator Agents <input type="checkbox"/>	K <input type="checkbox"/>	Supplemental Agreements <input type="checkbox"/>
ECVNA <input type="checkbox"/>	L <input type="checkbox"/>	Ancillary Services Agreements <input type="checkbox"/>
MVRNA <input type="checkbox"/>	M <input type="checkbox"/>	Master Registration Agreement <input type="checkbox"/>
BSC Agents	N <input type="checkbox"/>	Data Transfer Services Agreement <input type="checkbox"/>
SAA <input type="checkbox"/>	O <input type="checkbox"/>	British Grid Systems Agreement <input type="checkbox"/>
FAA <input type="checkbox"/>	P <input type="checkbox"/>	Use of Interconnector Agreement <input type="checkbox"/>
BMRA <input type="checkbox"/>	Q <input type="checkbox"/>	Settlement Agreement for Scotland <input type="checkbox"/>
ECVAA <input type="checkbox"/>	R <input type="checkbox"/>	Distribution Codes <input type="checkbox"/>
CDCA <input type="checkbox"/>	S <input type="checkbox"/>	Distribution Use of System Agreements <input type="checkbox"/>
TAA <input type="checkbox"/>	T <input type="checkbox"/>	Distribution Connection Agreements <input type="checkbox"/>
CRA <input type="checkbox"/>	U <input type="checkbox"/>	BSCCo
Teleswitch Agent <input type="checkbox"/>	V <input checked="" type="checkbox"/>	Internal Working Procedures <input checked="" type="checkbox"/>
SVAA <input type="checkbox"/>	W <input type="checkbox"/>	Other Documents
BSC Auditor <input type="checkbox"/>	X <input checked="" type="checkbox"/>	Transmission Licence <input type="checkbox"/>
Profile Administrator <input type="checkbox"/>		System Operator-Transmission Owner Code <input type="checkbox"/>
Certification Agent <input type="checkbox"/>		
MIDP <input type="checkbox"/>		
Other Agents		
SMRA <input type="checkbox"/>		
Data Transmission Provider <input type="checkbox"/>		

X = Identified in Report for last Procedure
 N = Newly identified in this Report

1 DESCRIPTION OF PROPOSED MODIFICATION AND ASSESSMENT AGAINST THE APPLICABLE BSC OBJECTIVES

1.1 Modification Proposal

Modification Proposal P192 'Change of Name of the Transmission Company' ('P192') (Annex 1) was raised on 27 July 2005 by National Grid Electricity Transmission plc (the 'Proposer').

The P192 Initial Written Assessment (IWA) (Annex 2) was presented to the Panel on 11 August 2005; where the Panel provisionally determined that P192 should be made and should proceed directly to the Report Phase.

The Panel agreed that a draft Modification Report, based on its provisional views, should be issued for industry consultation and be submitted to the Panel for decision on 8 September 2005.

At the Panel meeting on 8 September 2005, the Panel considered the responses to this consultation and confirmed it's recommendation that P192 should be approved.

1.2 Proposed Modification

P192 proposes that the Code be modified to reflect the new name of the Transmission Company – National Grid Electricity Transmission plc.

A motion was submitted to the Annual General Meeting of the Transmission Company held on 25 July 2005 proposing to change the Company name from "National Grid Company plc" to "National Grid Electricity Transmission plc". The motion also amended the Group Company name to "National Grid plc" (formerly "National Grid Transco plc"). The motion was approved by shareholders and the changes took effect legally on 27 July 2005.

The definition of the Transmission Company should consequently be amended in the Code to align with the new legal name of the Company.

It should be noted that although the company name has changed, the company number remains the same. Legally there would be no interpretational problems with the current reference to National Grid Company Plc, while the Modification Proposal is progressed.

1.3 Issues Raised by the Proposed Modification

The following issues were considered during the assessment of Proposed Modification P192:

- Implementation approach; and
- Impact on the Code, Code Subsidiary Documents (CSDs) and other configurable items

These issues are detailed in section 1.2 of the Initial Written Assessment Report (Annex 2).

1.4 Assessment of how the Proposed Modification will Better Facilitate the Applicable BSC Objectives

The Panel supports the Proposer's view that it is self-evident that P192 better facilitates the achievement of Applicable BSC Objectives (a) and (d):

"The efficient discharge by the Transmission Company of the obligations imposed under the Transmission Licence;" is satisfied, as the Transmission Company are ensuring the correct definition of their name is reflected in the Code; and

"The promotion of efficiency in the implementation and administration of the balancing and settlement arrangements" is satisfied, as BSCCo are ensuring the Code and CSDs are consistent and correct with the definition of the Transmission Company.

The Panel is of the view that P192 has no impact on any of the other Applicable BSC Objectives.

1.5 Alternative Modification

There is no Alternative Modification.

1.6 Governance and Regulatory Framework Assessment

No impact identified

2 COSTS²

PROGRESSING MODIFICATION PROPOSAL

Meeting Cost	£ 0
Legal/expert Cost	£ 0
Impact Assessment Cost	£ 0
ELEXON Resource	5 Man days £ 930

IMPLEMENTATION COSTS

The changes to CSDs and other configurable items would be made on an opportune basis (i.e. when the documents are next open for change) and therefore the associated cost of delivery would be negligible.

3 RATIONALE FOR PANEL'S RECOMMENDATIONS

The Panel Members unanimously believed that Proposed Modification P192 would better facilitate the achievement of Applicable BSC Objectives (a) and (d), and should be approved (see section 1.4).

The Panel Members unanimously agreed that the recommended Implementation Date for Proposed Modification P192 should be 5 Working Days after an Authority decision is made. It was agreed that the required changes to CSDs and other configurable items should be made on an opportune basis at a later date.

4 IMPACT ON BSC SYSTEMS AND PARTIES

An assessment has been undertaken in respect of BSC Systems and Parties and the following have been identified as potentially being impacted by the Proposed Modification.

² Clarification of the meanings of the cost terms in this section can be found in annex 7 of this report

4.1 BSCCo

The delivery teams will be responsible for updating the CSDs, to reflect the Transmission Company's new name. Individual departments and teams will be responsible for updating their internal procedures, the BSCCo website, and BSC Agent contracts to recognise the new name of the Transmission Company.

These changes would be made on an opportune basis, hence would be updated when the relevant items are next open for change.

5 IMPACT ON CODE AND DOCUMENTATION

5.1 Balancing and Settlement Code

The Code sections impacted by P192 are section X-1 and V:

Item	Potential Impact of Proposed Modification
Section X-1	The Transmission Company is currently defined as 'The National Grid plc, registered number 02366977;' This will be amended to 'National Grid Electricity Transmission plc, registered number 02366977, and any reference to "NGC" in the Code or any Code Subsidiary Document shall have the same meaning;'
Section V	NGC Demand Forecast (DF) will become Transmission Company Demand Forecast (DF)

5.2 Code Subsidiary Documents and Configurable Items

An initial assessment has been undertaken in respect of all CSDs and configurable items and the following documents have been identified as potentially being impacted by the Modification Proposal. The recommended changes to documentation are detailed in Annex 4 of the Initial Written Assessment Report (Annex 2).

Item(s)	Potential Impact of Proposed Modification
BSCP14, BSCP15, BSCP20, BSCP68, BSCP75, BSCP508	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate. Where 'NGC' is part of a flow name, group name or data item name, these items should not be changed.
Reporting Catalogue NETA Data File Catalogue	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate. Where 'NGC' is part of a flow name, group name or data item name, these items should not be changed.
Interface Definition and Design (IDD) Part 1, IDD Part 2	References to 'NGC' should be either replaced with 'NGET' or the System Operator as appropriate. Where 'NGC' is part of a flow name, group name or data item name, these items should not be changed.
Service Descriptions: Central Data Collection Agent, Settlement Administration Agent, Schedule,	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate. Where 'NGC' is part of a flow name, group name or data item name, these items should not be changed.
SVAA (Supplier Volume Allocation Agent)	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate. Where 'NGC' is part of a flow name,

Service Line 330	group name or data item name, these items should not be changed.
Initial Settlement and Reconciliation Agent (ISRA) System Management Guide, ISRA Technical Specification.	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate. Where 'NGC' is part of a flow name, group name or data item name, these items should not be changed.
User Requirement Specification: CDCA, CRA, ECVAA, FAA, SAA, SVAA, TAA, Website	References to 'NGC' should be either replaced with 'NGET' or the System Operator as appropriate. Where 'NGC' is part of a flow name, group name or data item name, these items should not be changed.

5.3 BSCCo Memorandum and Articles of Association

There is no impact on the BSCCo Memorandum and Articles of Association.

5.4 Impact on Core Industry Documents and Supporting Arrangements

There is no impact on Core Industry Documents or supporting arrangements by this Modification Proposal, however National Grid Electricity Transmission plc are submitting separate changes to address the name change in other Industry Codes. These changes are independent of P192.

6 SUMMARY OF CONSULTATIONS

A consultation on the draft Modification Report was issued to the industry on 15 August 2005 with responses due on 24 August 2005. Four responses were received, representing 22 Parties. The responses may be seen in full in annex 5 of this document.

Consultation question	Respondent agrees	Respondent disagrees	Opinion unexpressed
Do you agree with the Panel's views on P192 and the provisional recommendation to the Authority contained in the draft Modification Report that P192 should be made?	4 (22)	0	0
Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal?	4 (22)	0	0
Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P192?	4 (22)	0	0

All respondents agreed with the recommendations in the draft Modification Report, and that the legal text addresses the issues identified in the report. No other comments were received.

The Panel noted the unanimous support from the respondents for the Proposed Modification, and for the legal text and Implementation Date.

7 SUMMARY OF TRANSMISSION COMPANY ANALYSIS

7.1 Analysis

The Transmission Company Analysis of P192 is detailed in annex 3, and has highlighted the following points:

- the implementation of P192 would have no impact on the Transmission Company's ability to discharge their obligations under the Transmission Licence;
- the Transmission Company believe P192 better facilitates applicable BSC Objective a) and d);
- there are no impacts on Transmission Company computer systems;
- there are no issues relating to the security of supply;
- there are no developmental costs; and
- other industry codes are going through separate change processes independently of P192.

8 SUMMARY OF EXTERNAL ADVICE

No external advice was sought.

9 IMPLEMENTATION APPROACH

The recommended Implementation Date for Proposed Modification P192 is:

- 5 Working Days after an Authority decision is made.

It should be noted that, the recommended changes to CSDs and other configurable items would be delivered on an opportune basis.

10 DOCUMENT CONTROL

10.1 Authorities

Version	Date	Author	Reviewer	Change Reference
0.1	11/08/05	Sakib Azam	Tom Bowcutt	
0.2	12/08/05	Sakib Azam	Sarah Jones	
0.3	15/08/05	Sakib Azam	Industry Consultation	
0.4	30/08/05	Sakib Azam	Sarah Jones	
0.5	30/08/05	Sakib Azam	David Osborne	
0.6	02/08/05	Sakib Azam	Panel	
1.0	08/08/05	Sakib Azam	Authority	

10.2 References

Ref	Document	Owner	Issue date	Version
1	P192 Modification Proposal	ELEXON	27/07/2005	1.0
2	P192 Initial Written Assessment	ELEXON	5/08/2005	1.0

ANNEX 1 LEGAL TEXT

Attachment 1 contains the legal text for Proposed Modification P192.

ANNEX 2 INITIAL WRITTEN ASSESSMENT REPORT

Attachment 2 contains the Initial Written Assessment Report for P192.

ANNEX 3 TRANSMISSION COMPANY ANALYSIS

Attachment 3 contains the Transmission Company Analysis.

ANNEX 4 CLARIFICATION OF COSTS

The cost breakdowns are shown below:

PROGRESSING MODIFICATION PROPOSAL	
Meeting Cost	This is the cost associated with holding Modification Group meetings and is based on an estimate of the travel expenses claimed by Modification Group members.
Legal/expert Cost	This is the cost associated with obtaining external expert advice, usually legal advice.
Impact Assessment Cost	Service Provider Impact Assessments are covered by a pre-determined monthly contractual charge. Therefore the cost included in this report is an estimate based on the level of impact assessment that the modification is expected to require and may not reflect the actual cost attributed to the modification, which will be based on a percentage of the contractual impact assessment costs for each month that it is assessed.
ELEXON Resource	This is the ELEXON Resource requirement to progress the Modification Proposal through the Modification Procedures. This is estimated using a standard formula based on the length of the Modification Procedure.

ANNEX 5 CONSULTATION REPONSES

Attachment 4 contains the consultation responses