

## INITIAL WRITTEN ASSESSMENT for Modification Proposal P179 Housekeeping Modification

Prepared by: ELEXON<sup>1</sup> Limited

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

### RECOMMENDATIONS

On the basis of the initial assessment BSCCo recommends that the Panel:

- **DETERMINE that Modification Proposal P179 should be submitted directly to the Report Phase;**
- **AGREE that the draft Modification Report should be prepared, consulted on and submitted to the Panel for consideration at its meeting of 9 December 2004;**
- **AGREE that the draft Modification Report contain a provisional recommendation that P179 should be made with an Implementation Date of 23 February 2005 if an Authority decision is received on or before 8 February 2005, or 10 Working Days after an Authority decision if received after 8 February 2005.**

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

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

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## SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

As far as BSCCo has been able to assess the following parties/documents have been initially identified as being potentially impacted by Modification Proposal P179.

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

### **1.1 Modification Proposal**

Modification Proposal 179 'Housekeeping Modification' (P179) was raised on 15 October 2004 by the BSC Panel, on recommendation by ELEXON. (See Annex 1 and associated attachment (P179 Legal text)).

Under Section F2.1.1(d)(iv) of the Balancing and Settlement Code ('Code'), ELEXON can recommend a Modification Proposal to the Panel to rectify manifest errors, to correct minor inconsistencies and/or make other minor consequential changes to the Code.

P179 identifies 26 minor changes to the Code to; resolving manifest errors, correcting incorrect references, clarifying use of Code defined terms, resolving typographical errors and inconsistencies.

Because changes to the Code that would result from the implementation of the Proposed Modification have been clearly identified, the associated draft legal text has been prepared and is attached in Annex 2.

### **1.2 Issues raised by the Modification Proposal**

P179 proposes three amendments to Section K to reference a new BSC Procedure (BSCP25) which is yet to be approved by the Panel, and is therefore not present in the current version of the BSC Baseline. A query was raised by a Party as to whether a Housekeeping Modification should include changes of this type, as it maybe pre-empting future approval of documents.

The difficulty with not initiating Modification Procedures before a BSCP is implemented is that it would be implemented without any required reference to it within the Code. To ensure BSCP25 is referenced once implemented, the Modification Procedures must be initiated in advance of the BSCP implementation date.

This process has been followed on previous occasions, most recently for BSCP27 'Technical Assurance of Half Hourly Metering Systems for Settlement Purposes' where a number of minor reference changes were required to the code as a result of the removal of BSCP26 and BSCP526 and the introduction of BSCP27. The Housekeeping changes went forward as P164, in advance of the BSCP27 implementation date and the Modification Report was submitted on 8 April. An implementation date of 30 June 2004 was approved on this occasion. The approach being used in the implementation of BSCP25 is consistent with previous practice.

BSCP25 must be approved by ISG and SVG who will both take joint ownership of the BSCP. Once ISG and SVG have approved the BSCP, then the Panel must approve the BSCP before it can be implemented. BSCP25 will therefore be recommended for approval with an implementation date of 22 February 2005 at the February Panel (10 February 2005).

A further query was also raised regarding changes to Section W relating to P131 Legal Text which had yet to be implemented at the time P179 was raised, but had been Approved by the Authority with an Implementation Date of 3 November 2004. Once a Modification has been Approved, it forms part of the legal baseline, and can thus be subject to a Modification Proposal.

A query was also raised relating to whether the change to W4.2.1 fell into the criteria of a housekeeping Modification. The amendment to W4.2.1 is necessary to correct an error in the P131 text, and adopt the position which existed prior to P131. There is no substantive change to the intention of P131 by this amendment.

## 2 COSTS<sup>3</sup>

### PROGRESSING MODIFICATION PROPOSAL

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

The implementation cost associated with this Modification is expected to be 2 Man days, equating to £300.

## 3 INITIAL ASSESSMENT OF IMPACTS OF MODIFICATION PROPOSAL

### 3.1 Impact on BSC Systems and processes

An initial assessment has been undertaken in respect of all BSC Systems and processes and no areas have been identified as potentially being impacted by the Modification Proposal.

### 3.2 Impact on other systems and processes used by Parties

An initial assessment has been undertaken in respect of systems and processes used by Parties and no areas have been identified as potentially being impacted by the Modification Proposal.

### 3.3 Impact on documentation

#### 3.3.1 Impact on Balancing and Settlement Code

An initial assessment has been undertaken in respect of all sections of the Code and the following areas have been identified as potentially being impacted by the Modification Proposal.

Item	Potential Impact of Proposed Modification
Section D	Amended reference
Section G	Manifest error, amended reference
Section K	Manifest error
Section M	Typographical error, corrections to usage of Code defined term
Section N	Amended references
Section Q	Amended reference, typographical error
Section R	Correction to usage of Code defined term, amended references

<sup>3</sup> Clarification of the meanings of the cost terms in this section can be found in annex 3 of this report

Section S	Manifest error, amended references
Section V	Correction to usage of Code defined term, amended references
Section W	Redundant clause, manifest errors
Section X	Correction to usage of Code defined term, amended references, inconsistencies

The initial assessment also identified 2 interactions with Section I 'Transitional Arrangements for the implementation of BETTA' of the Code and are detailed below. Section I is in place to amend or replace existing Code paragraphs for the Transition Period for BETTA. It should be noted that housekeeping changes affecting Section I cannot be modified using the procedures set out in Section F 'Modification Procedures of the BSC'. During the Transition Period Section I can only be modified via a Proposed Transitional Modification.

#### Interaction 1:

P179 proposes to amend K1.3.3 to read as follows;

"The Distribution System Operators whose Distribution Systems and/or Associated Distribution Systems are connected at a Distribution Systems Connection Point shall, in accordance with BSCP 20 and BSCP25, agree between themselves and nominate which of them shall be responsible for such Systems Connection Point."

Section I6.2.2 cross-references K1.3.3 and states:

"Where reference is made in Sections K1.3.3, K2.2.2, K2.2.3 and K2.2.5 and K2.2.6 to BSCP 20 this shall, during the Transition Period, in relation to the registration of a Metering System in CMRS which is located in Scotland be deemed to be a reference to BDTP 20."

This amendment to K1.3.3 could be interpreted to mean that registration of Scottish Metering Systems in the Central Meter Registration Service (CMRS) during Transition would be bound by BSCP25 as well as BDTP20.

However following further analysis ELEXON can confirm that this will not be an issue, given that Section I8.1.1 states:

"During the Transition Period parties who have or will become Parties and/or Party Agents as a result of the extension of the application of the Code to Scotland shall comply with BDTP 70 and BDTP 25 as applicable."

Therefore during the Transition Period, I8.1.1 will override the reference to BSCP25 in K1.3.3.

#### Interaction 2

It is proposed to amend R6.1.1 to reference BSCP02, rather than BSCP20. R6.1.1 states:

"In accordance with BSCP~~20~~ and in conjunction with the relevant Meter Operator Agent, the CDCA shall carry out proving tests on CVA Metering Systems and shall report any resulting errors to the relevant Meter Operator Agent and Registrant."

I7.1.2 states: "During the Transition Period, in relation to CVA Metering Systems located in Scotland, every reference in Section R and Annex X-1 to BSCP20 shall be deemed to be a reference to BDTP 20."

Currently R6.1.1 is read to refer to BDTP20 when considering Scottish CVA Metering Systems; however the impact of P179 could have the effect that Scottish CVA Metering Systems proving tests are bound by BSCP02 during the Transition Period.

Following further analysis, ELEXON can confirm that this will not be an issue, given that BDTP20 states that any party registering a Metering System using the processes and procedures detailed in BDTP20 must carry out a Proving Test on that Metering System in accordance with BDTP02. Section R requires Meter Technical Details to be submitted in accordance with BSCP20. As a consequence of I7.1.2, this is deemed to be a

reference to BDTP20, which as mentioned requires Proving Tests to be carried out according to BDTP02 and not BSCP02.

In practise, all Scottish Metering Systems have already registered using BDTP20 and therefore the Proving Tests will be carried out in accordance with BDTP02 and are expected to be completed by the time P179 is implemented, therefore P179 would not have any impact on Scottish CVA Metering Systems.

### **3.3.2 Impact on Code Subsidiary Documents**

An initial assessment has been undertaken in respect of all Code Subsidiary Documents and no areas have been identified as potentially being impacted by the Modification Proposal.

### **3.4 Impact on Core Industry Documents**

An initial assessment has been undertaken in respect of Core Industry Documents and no areas have been identified as potentially being impacted by the Modification Proposal.

### **3.5 Impact on other configurable items**

An initial assessment has been undertaken in respect of other configurable items and no areas have been identified as potentially being impacted by the Modification Proposal.

## **4 IMPACT ON BSCCO**

An initial assessment has been undertaken in respect of BSCCo and no areas have been identified as potentially being impacted by the Modification Proposal.

## **5 IMPACT ON BSC AGENT CONTRACTUAL ARRANGEMENTS**

An initial assessment has been undertaken in respect of BSC Agent contractual arrangements and no areas have been identified as potentially being impacted by the Modification Proposal.

## **6 RATIONALE FOR BSCCO'S RECOMMENDATIONS TO THE PANEL**

P179 was raised by the BSC Panel in accordance with section F2.1.1(d)(iv) of the Code to rectify manifest errors, to correct minor inconsistencies, and make other minor consequential changes to the Code. The Panel believe that P179 would better facilitate BSC Objective (d):

- d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.

In accordance with Section F2.7 of the Code, BSCCo therefore recommends that P179 should proceed directly to Report Phase with the recommendation that the Proposed Modification be made with an Implementation Date of 23 February 2005 if an Authority decision is received on or before 8 February 2005, or 10 working days after an Authority decision if received after 8 February 2005. This date is the earliest the Modification can be implemented because the CVA February Release is scheduled for implementation on 23 February 2005, when BSCP25 will be implemented as part of CP1049.

## **7 PROCESS, TIMETABLE AND COST FOR PROGRESSING THE MODIFICATION PROPOSAL**

BSCCo recommends that this Modification Proposal proceed directly to Report Phase with the following recommendation that the Proposed Modification be made with an implementation date of 23 February 2005

if an Authority decision is received on or before 8 February 2005, or 10 Working Days after an Authority decision if received after 8 February 2005.

## 8 DOCUMENT CONTROL

### 8.1 Authorities

Version	Date	Author	Reviewer	Reason for Review
0.1	25/10/04	Sakib Azam	Change Delivery	Formal
0.2	25/10/04	Sakib Azam	Change Delivery	Formal
0.3	02/11/04	Sakib Azam	Change Delivery	Formal
1.0	5/11/04	Sakib Azam	Change Delivery	For Issue

### 8.2 References

Ref No.	Document Title	Owner	Issue Date	Version



**ANNEX 1 MODIFICATION PROPOSAL**

<b>Modification Proposal</b>	<b>MP No: P179</b> <i>(mandatory by BSCCo)</i>
<b>Title of Modification Proposal</b> <i>(mandatory by proposer):</i> Housekeeping Modification	
<b>Submission Date</b> <i>(mandatory by proposer):</i> 15 October 2004	
<b>Description of Proposed Modification</b> <i>(mandatory by proposer):</i> Under Section F2.1.1(d)(iv) of the Balancing and Settlement Code, ELEXON can recommend a Modification Proposal to the Panel to rectify manifest errors, to correct minor inconsistencies and/or make other minor consequential changes to the Code.	
<b>Description of Issue or Defect that Modification Proposal Seeks to Address</b> <i>(mandatory by proposer):</i> 26 Minor changes to the Code to correct; manifest errors, incorrect references, use of Code defined terms, typographical errors and inconsistencies.	
<b>Impact on Code</b> <i>(optional by proposer):</i> See Annex 1 – Table of proposed changes to the Code	
<b>Impact on Core Industry Documents</b> <i>(optional by proposer):</i> None	
<b>Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties</b> <i>(optional by proposer):</i> None	
<b>Impact on other Configurable Items</b> <i>(optional by proposer):</i> None	
<b>Justification for Proposed Modification with Reference to Applicable BSC Objectives</b> <i>(mandatory by proposer):</i> The proposed changes would achieve Applicable BSCP Objective (D) "Promoting efficiency in the implementation and administration of the balancing and settlement arrangements". Making these would remove a number of potential ambiguities and possibilities of incorrect interpretations of the Code	
<b>Details of Proposer:</b> <b>Name:</b> <b>Organisation:</b> BSC Panel <b>Telephone Number:</b> <b>Email Address:</b>	

<b>Modification Proposal</b>	<b>MP No: P179</b> <i>(mandatory by BSCCo)</i>
<b>Details of Proposer's Representative:</b> <b>Name:</b> Modifications Secretary <b>Organisation:</b> ELEXON <b>Telephone Number:</b> 0207 380 4100 <b>Email Address:</b> chris.rowell@elexon.co.uk	
<b>Details of Representative's Alternate:</b> <b>Name:</b> <b>Organisation:</b> <b>Telephone Number:</b> <b>Email Address:</b>	
<b>Attachments: YES</b> <b>If Yes, Title and No. of Pages of Each Attachment:</b> Draft Legal text	