



## MODIFICATION REPORT for Modification Proposal P169

### 'Publication of BMU names on ELEXON website'

Prepared by: ELEXON on behalf of the BSC Panel

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#### RECOMMENDATIONS

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

- **that the Alternative Modification P169 should be made;**
- **that the Proposed Modification P169 should not be made;**
- **an Implementation Date for the Alternative Modification of 10 Working Days after an Authority decision;**
- **an Implementation Date for the Proposed Modification (in the event that the Authority determines that the Proposed Modification should be made) of 10 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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<sup>1</sup> The current version of the Balancing and Settlement Code (the 'Code') can be found at [ELEXON - Balancing and Settlement Code \(BSC\) - Live Version](#)

## CONTENTS TABLE

<b>Recommendations .....</b>	<b>1</b>
<b>Summary of impacted parties and documents .....</b>	<b>3</b>
<b>1 Description of Proposed Modification and assessment against the Applicable BSC Objectives .....</b>	<b>4</b>
1.1 Modification Proposal .....	4
1.1.1 Aim of Modification Proposal .....	4
1.1.2 Process followed to date .....	4
1.1.3 Interaction with Modification Proposal P168 .....	5
1.2 Proposed Modification .....	5
1.3 Issues raised by the Proposed Modification .....	6
1.4 Alternative Modification .....	6
1.5 Issues raised by the Alternative Modification .....	7
1.6 Governance and regulatory framework assessment .....	7
1.7 Modification Group's assessment of how the Proposed Modification would better facilitate the Applicable BSC Objectives.....	7
1.8 Assessment of how the Alternative Modification will better facilitate the Applicable BSC Objectives.....	8
<b>2 Costs.....</b>	<b>9</b>
2.1 Implementation costs – Proposed Modification .....	9
2.2 Implementation costs – Alternative Modification .....	10
<b>3 Rationale for Panel's recommendations .....</b>	<b>11</b>
<b>4 Impact on BSC Systems and Parties .....</b>	<b>12</b>
4.1 BSCCo .....	12
4.2 BSC Systems.....	12
4.3 Parties and Party Agents .....	13
<b>5 Impact on Code and documentation.....</b>	<b>13</b>
5.1 Balancing and Settlement Code .....	13
5.2 Code Subsidiary Documents .....	13
5.3 BSCCo Memorandum and Articles of Association .....	13
5.4 Impact on Core Industry Documents and supporting arrangements .....	13
<b>6 Summary of Report Phase consultation responses .....</b>	<b>14</b>
6.1 Panel's provisional recommendation .....	14
6.2 Draft legal text .....	14
6.3 Recommended Implementation Date .....	14
6.4 Further comments .....	14
6.5 Comments and views of the Panel .....	15
<b>7 Summary of Transmission Company analysis.....</b>	<b>15</b>
7.1 Analysis.....	15
7.2 Comments and views of the Panel .....	15
<b>8 Summary of external advice .....</b>	<b>15</b>
<b>9 Implementation approach .....</b>	<b>15</b>
<b>10 Document control .....</b>	<b>16</b>
10.1 Authorities .....	16
10.2 References.....	17
<b>Annex 1 Legal text .....</b>	<b>17</b>
<b>Annex 2 Modification Group details.....</b>	<b>17</b>

**Annex 3 Assessment Report ..... 18**  
**Annex 4 Report Phase consultation responses..... 18**  
**Annex 5 Clarification of Costs ..... 18**

**SUMMARY OF IMPACTED PARTIES AND DOCUMENTS**

The following parties/documents have been identified as impacted by Modification Proposal P169.

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

\*P169 requires no changes to any systems or processes used by Parties. However, P169 impacts Parties to the extent that the names of their BM Units (Proposed Modification P169) and wider BM Unit registration data (Alternative Modification P169) would be made available to all interested parties via the BSC Website. Publication of this data may also aid Parties in carrying out certain activities, such as undertaking market analysis and monitoring their own data.

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

## **1.1 Modification Proposal**

### **1.1.1 Aim of Modification Proposal**

Modification Proposal P169 'Publication of BMU names on ELEXON website' ('P169') was raised by SmartestEnergy Ltd ('the Proposer') on 27 July 2004.

P169 proposes that all BM Unit names be published on the BSC (ELEXON) Website alongside their identification numbers (IDs). The Proposer notes that BM Unit IDs and Party names and IDs are already published on the website, and argues that additionally making BM Unit names available would aid market analysis – furthering the openness and transparency of the electricity market.

The Proposer therefore believes that P169 would better facilitate Applicable BSC Objective (c):

'Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity'.

BM Unit names for all live BM Units are currently received by BSCCo from the Central Registration Agent (CRA), via the CRA-I020 data flow (Operations Registration Report) sent to BSCCo's Trading Operations Market Analysis System (TOMAS). This data currently falls within the category of Confidential Information under the Balancing and Settlement Code ('the Code'), and may not be Disclosed by BSCCo.

P169 therefore seeks to modify the Code in order to expressly allow for publication of BM Unit names. This data has never been published under NETA, and would therefore represent new information for industry.

For more detail regarding the Code's definition of Confidential Information, and the rules regarding its Disclosure, please refer to the P169 Assessment Report in Annex 3.

### **1.1.2 Process followed to date**

The P169 Initial Written Assessment (IWA, Reference 1) was presented at the Panel Meeting held on 12 August 2004, where the Panel determined that P169 should be submitted to a two-month Assessment Procedure by a new Modification Group composed of members of the Governance, Settlement and Volume Allocation Standing Modification Groups. Details of the Group's membership can be found in Annex 2.

The P169 Modification Group (P169 MG) met twice during the Assessment Procedure – on 16 August and 22 September 2004 – and also developed an Alternative Modification. An England and Wales industry consultation was issued (Reference 2), and subsequently extended following BETTA Go-Active to allow respondents to consider any additional GB issues relating to P169 (Reference 3). A summary of the P169 MG's discussions and recommendations can be found in Sections 1.7 and 1.8, and more detail regarding these discussions and the Assessment Consultation responses can be found in the P169 Assessment Report in Annex 3. The Group also commissioned impact assessments from BSCCo and the Transmission Company, and summaries of the impacts returned can be found in Sections 4, 5 and 7.

The P169 Assessment Report was presented to the Panel at its meeting of 14 October 2004, where the Panel unanimously agreed with the recommendation of the Group that P169 proceed to the Report Phase with a provisional recommendation that the Alternative Modification should be made.

Respondents to the P169 Report Phase consultation unanimously agreed with the provisional recommendations of the Panel. A summary of the responses can be found in Section 6, with full copies of these responses attached as Annex 4.

The Panel considered the P169 draft Modification Report (Reference 4) and these consultation responses at its meeting on 11 November 2004. The Panel unanimously confirmed its recommendation that the Alternative Modification P169 should be made, and that the Proposed Modification P169 should therefore not be made.

Legal text has been provided for both the Proposed and Alternative Modifications, and is attached as Annex 1.

### **1.1.3 Interaction with Modification Proposal P168**

Modification Proposal P168 'Publication of BMU GC and DC values on ELEXON website' ('P168') was also raised by SmartestEnergy Ltd on 27 July 2004, and proposes that Generation Capacity (GC) and Demand Capacity (DC) values be published on the BSC Website for all live BM Units. Since the defects identified by P168 and P169 are similar, the Panel agreed that the two Proposals should be considered by the same Modification Group.

The Panel initially determined that the Proposals should be progressed separately under a one-month Assessment Procedure for P168 and a two-month Assessment Procedure for P169. The Panel requested that the P168 discussions focus only on developing the solution for publishing GC and DC values, with any broader issues relating to Confidential Information or data publication to be considered under P169.

At its meeting of 2 September 2004, the Panel subsequently extended the P168 Assessment timetable by one month in order to undertake a GB-wide consultation. Please note that, although the two Proposals were still progressed separately by the Modification Group, both the Group and the Panel expressed a preference for the Alternative Modification P169 which would negate the need for P168. More detail can be found in Sections 1.4, 3 and 9 of this report.

For further information regarding P168, please refer to the P168 Modification Report (Reference 5).

## **1.2 Proposed Modification**

The solution developed by the P169 MG is that BM Unit names should be extracted from TOMAS by BSCCo and published as part of the existing 'Registered BMU' spreadsheet within the Central Registration Service (CRS) Registration Data section of the BSC Website. This spreadsheet contains the CRS registration data which BSCCo is required to publish on the BSC Website in accordance with paragraph V4.2.3 of the Code (currently all Party IDs, Party names and live BM Unit IDs). The Group agreed that the 'Registered BMU' spreadsheet should continue to be updated on its existing weekly basis.

The P169 MG noted that this solution matched the intention of the Proposer that BM Unit names should be published alongside BM Unit IDs. The Group additionally noted that, since P168 proposes to include GC and DC values within the same spreadsheet, this approach would mean that all the data would be available in one place if both P168 and the Proposed Modification P169 were approved – and would also enable implementation costs to be shared if the two Modifications were delivered together (see Section 9 for more information regarding this interaction).

The Group therefore agreed that V4.2.3 should be amended to add BM Unit names to the list of CRS registration data. Where data is published under Section V, such data is no longer regarded as Confidential Information.

### 1.3 Issues raised by the Proposed Modification

The following issues raised by the Proposed Modification P169 were considered by the P169 MG during the Assessment Procedure:

- Format and frequency of publication of BM Unit names;
- Consideration of GB-wide arrangements following BETTA Go-Active; and
- Consideration of the draft legal text.

For further details regarding these issues, please refer to the P169 Assessment Report in Annex 3.

### 1.4 Alternative Modification

During the Assessment Procedure for P169, the P169 MG also developed an Alternative Modification whereby the registration data for all live BM Units contained in the CRA-I020 flow would be published on the BSC Website. This data would include both BM Unit names and GC/DC values, plus additional information for each live BM Unit as outlined below:

- BM Unit ID;
- BM Unit name;
- BM Unit type;
- NGC BM Unit name;
- Lead Party ID;
- GSP Group ID;
- GSP Group name;
- Trading Unit name;
- Generation Capacity (MW);
- Demand Capacity (MW);
- Production/Consumption flag;
- Production/Consumption status;
- Transmission Loss Factor;
- Credit Assessment Load Factor;
- BM Unit Credit Assessment Import Capability;
- BM Unit Credit Assessment Export Capability;
- Exempt Export flag;
- Base Trading Unit flag;
- Final Physical Notification flag;
- Interconnector ID; and
- Effective From Date.

The P169 MG agreed that the Alternative Modification addressed the defect identified by the Modification Proposal, and noted that it would also negate the need for P168 since the data would contain GC and DC values. The Group noted that this Alternative would go part way to delivering the recommendation of a recent expert group to the Imbalance Settlement Group that the full contents of the CRA-I020 should be made available, and could avoid the costs of future Modification Proposals being raised in order to Disclose further BM Unit data. The Group also noted that publication of the additional data under the Alternative would not incur any additional implementation costs, since the costs of implementing the Alternative Modification P169 would be the same as for P168 (see Sections 4, 5 and 9 for more detail).

The P169 MG agreed that this BM Unit registration data should be added to the existing 'Registered BMU' spreadsheet, so that it could be viewed against the BM Unit IDs, Party names and Party IDs already published within this document. The Group agreed that this would enable all BM Unit

registration data to be viewed in one easily-accessible format. The Group also agreed that the 'Registered BMU' spreadsheet should continue to be updated weekly under the Alternative Modification.

For more detail regarding the Group's rationale in developing the Alternative Modification, please refer to the P169 Assessment Report in Annex 3.

## **1.5 Issues raised by the Alternative Modification**

The following issues raised by the Alternative Modification P169 were considered by the P169 MG during the Assessment Procedure:

- Contents of CRA-I020 and scope of Alternative Modification;
- Format and frequency of publication of BM Unit registration data;
- Consideration of GB-wide arrangements following BETTA Go-Active; and
- Consideration of the draft legal text.

For further details regarding these issues, please refer to the P169 Assessment Report in Annex 3.

## **1.6 Governance and regulatory framework assessment**

The P169 MG discussed whether there were any wider common-law confidentiality rights which might override the provisions of the Code. The Group noted BSCCo's legal advice that, under the existing provisions of V1.3, Parties 'irrevocably and unconditionally' consent to publication of data on the BSC Website (as well as the use and Disclosure of that data by other Parties) where such data is published under paragraph V4 of the Code. The Group noted BSCCo's legal view that no additional confidentiality waiver by Parties would be required in respect of their BM Unit names (Proposed Modification P169) or wider BM Unit registration data (Alternative Modification P169) – since this data would be published in accordance with paragraph V4 under the P169 legal text, and the views of Parties regarding its publication would have been sought during the P169 consultations.

## **1.7 Modification Group's assessment of how the Proposed Modification would better facilitate the Applicable BSC Objectives**

The majority view of the P169 MG was that P169 would better facilitate the achievement of Applicable BSC Objective (c).

- A majority of the Group agreed that publication of BM Unit names would promote the transparency of the market and thereby better facilitate competition. These members considered that publication of this information would help Parties in monitoring their own data, participants in undertaking market analysis, and directly-connected Customers in establishing which site they are connected to. These members also considered that lack of transparency of the data could potentially act as a barrier to participation in the market – particularly for smaller players and new entrants, who might not have the knowledge needed to derive the information from other existing sources.
- However, one member of the Group stated that they were unconvinced that publication of BM Unit names would better facilitate competition, since it was not clear to them how the data would be used by participants.

No members of the P169 MG or respondents to the Assessment Consultation identified any reason why BM Unit names should remain Confidential Information, or any loss which would result to the owners of BM Units from the publication of this data. The Group considered that the information could already be derived using existing available data, such as BM Unit IDs or NGC's Seven Year Statement.

The P169 MG noted that the usefulness of BM Unit names would depend upon the individual names chosen by the Lead Parties under BSCP15 'BM Unit Registration', since some contain the names of individual generating plant whilst others are simply a repetition of the BM Unit ID.

Although the majority of P169 MG members believed that the Proposed Modification would better facilitate the achievement of the Applicable BSC Objectives, it should be noted that all members of the Group (and the majority of respondents to the Assessment Consultation) expressed a preference for the Alternative Modification (see Section 1.8 below).

The unanimous view of the P169 MG was therefore that the Proposed Modification P169 should not be made.

## **1.8 Assessment of how the Alternative Modification will better facilitate the Applicable BSC Objectives**

The unanimous view of the P169 MG was that the Alternative Modification P169 should be made.

- The Group agreed that the Alternative Modification would better facilitate Applicable BSC Objective (c), when compared with the Proposed Modification and the current Code baseline.
- The Group agreed that the data published under the Alternative would deliver the benefits of both P168 and the Proposed Modification P169 at no additional cost, and would also go further towards achieving a fully transparent market and facilitating competition by publishing additional BM Unit registration data.
- The Group agreed that publication of this data would help Parties in monitoring their own data, and participants in undertaking market analysis. The Group also considered that non-publication of wider BM Unit registration data potentially discriminated against small Parties or new entrants, since these would not necessarily have the resources or knowledge to locate or derive the information via other existing sources.

No members of the P169 MG or respondents to the Assessment Consultation identified any reason why the wider BM Unit registration data should remain Confidential Information, or any loss which would result to the owners of BM Units from the publication of these values. The Group noted that some of the data concerned – such as CALF values and NGC BM Unit names – are already published elsewhere, and that more commercially-sensitive information is also available to Parties through Settlement reports such as the SAA-I014 data flow. In addition, some members suggested that larger Parties or those with a longer history of market participation may already be able to work out the remaining data using existing information such as the SAA-I014 or NGC's Seven Year Statement.

The P169 MG noted that approval of the Alternative Modification P169 would negate the need for P168.



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

### PROGRESSING MODIFICATION PROPOSAL

<b>Demand Led Cost</b>	£500
<b>ELEXON Resource</b>	35 Man days £6,360

### 2.1 Implementation costs – Proposed Modification

#### IMPLEMENTATION COSTS – Proposed Modification P169

		Stand Alone Cost	P169 (Proposed) Incremental Cost	Tolerance
<b>Service Provider<sup>3</sup> Cost</b>				
	Change Specific Cost	0	0	N/A
	Release Cost	0		N/A
	Incremental Release Cost	0	0	N/A
	<b>Total Service Provider Cost</b>	0	0	N/A
<b>Implementation Cost</b>				
	External Audit	0	0	N/A
	Design Clarifications	0	0	N/A
	Additional Resource Costs	0	0	N/A
	Additional Testing and Audit Support Costs	0		N/A
<b>Total Demand Led Implementation Cost</b>		0	0	N/A

<sup>2</sup> Clarification of the meanings of the cost terms in this section can be found in Annex 5 of this report.

<sup>3</sup> BSC Agent and non-BSC Agent Service Provider and software costs.

<b>ELEXON Implementation Resource Cost</b>		3.5 man days* £1,050*	N/A*	+/- 5%
<b>Total Implementation Cost</b>		£1,050	N/A	+/- 5%

\*Please note that the Proposed Modification P169 would incur changes to the Code and BSCCo systems and processes only. As no Code Subsidiary Documents or other configurable items are impacted (see Section 5.2), there is therefore no cost distinction between implementation as a stand-alone change and as part of a release. The recommended Implementation Date for the Proposed Modification is 10 Working Days following an Authority decision. More information can be found in Section 9.

## ONGOING SUPPORT AND MAINTENANCE COSTS – Proposed Modification P169

	Stand Alone Cost	P169 (Proposed) Incremental Cost	Tolerance
Service Provider Operation Cost	0	0	N/A
Service Provider Maintenance Cost	0	0	N/A
ELEXON Operational Cost	0	0	N/A

## 2.2 Implementation costs – Alternative Modification

### IMPLEMENTATION COSTS – Alternative Modification P169

	Stand Alone Cost	P169 (Alternative) Incremental Cost	Tolerance
<b>Service Provider Cost</b>			
Change Specific Cost	0	0	N/A
Release Cost	0		N/A
Incremental Release Cost	0	0	N/A
Total Service Provider Cost	0	0	N/A
<b>Implementation Cost</b>			
External Audit	0	0	N/A
Design Clarifications	0	0	N/A
Additional Resource Costs	0	0	N/A
Additional Testing and Audit Support Costs	0		N/A

<b>Total Demand Led Implementation Cost</b>		0	0	N/A
<b>ELEXON Implementation Resource Cost</b>		39 man days* £11,700*	9 man days* £2,700*	+/- 5%
<b>Total Implementation Cost</b>		£11,700	£2,700	+/- 5%

\* The recommended Implementation Date for the Alternative Modification P169 is 10 Working Days following an Authority decision, with the Code and ELEXON reporting changes to take effect from this date. Although there is also a minor impact on the Reporting Catalogue, the recommendation of the P169 MG is that the Reporting Catalogue change be made at a later opportune date as part of a scheduled release in order to only incur the incremental cost shown above (see Section 9 for further details).

## ONGOING SUPPORT AND MAINTENANCE COSTS – Proposed Modification P169

	Stand Alone Cost	P169 (Alternative) Incremental Cost	Tolerance
Service Provider Operation Cost	0	0	N/A
Service Provider Maintenance Cost	0	0	N/A
ELEXON Operational Cost	0	0	N/A

### 3 RATIONALE FOR PANEL'S RECOMMENDATIONS

The Panel considered the P169 Assessment Report at its meeting of 14 October 2004. The Panel agreed with the view of the P169 MG that the Proposed Modification would better facilitate the achievement of Applicable BSC Objective (c), but that the Alternative Modification would better facilitate the achievement of this objective when compared with the Proposed Modification and the current Code baseline.

The Panel therefore unanimously agreed the provisional recommendation that the Alternative Modification should be made, and that the Proposed Modification should not be made. The arguments of the Panel mirrored those of the Group as set out in Sections 1.7 and 1.8 above.

The Panel requested that the Authority note its preference for the Alternative Modification P169 over P168, which would no longer be required if the Alternative was implemented.

The Panel unanimously agreed with the Implementation Date and implementation approach proposed by the Group, and noted that it would be desirable for the Authority to make its decisions regarding P168 and P169 simultaneously (see Section 9). A Panel Member commented that the proposed method of utilising an existing spreadsheet for publication of the data represented an efficient solution.

Another Panel Member commented that the P169 Assessment Consultation responses had showed a marked split in the views of larger Parties (who believed that non-publication of the data was not a barrier to participation) and smaller players (who did believe it to be a barrier). BSCCo clarified that the P169 MG had agreed that lack of data transparency could be a barrier to participation in the market for smaller participants and new entrants.

The Panel's provisional recommendation was consulted upon as part of the P169 draft Modification Report. At its meeting of 11 November 2004 the Panel considered this report and the responses received to the consultation (see Section 6). The Panel unanimously confirmed its recommendation that the Alternative Modification P169 should be made, and that the Proposed Modification P169 should therefore not be made.

## 4 IMPACT ON BSC SYSTEMS AND PARTIES

During the Assessment Procedure, an assessment was undertaken in respect of BSC Systems and Parties. The following have been identified as impacted by P169.

### 4.1 BSCCo

The table below provides a summary of the effort required by BSCCo to support the implementation of the P169 Proposed and Alternative Modifications. Full cost information can be found in Section 2 of this report.

Area of business	Impact of Proposed Modification	Impact of Alternative Modification
BSC Configuration Administration	2 man days' effort would be required to implement changes to Section V of the Code.	Same as for Proposed Modification.
Market Monitoring	½ man day's effort would be required to add new 'BM Unit name' field to the TOMAS manual report template used to produce the 'Registered BMU' spreadsheet.	½ man day's effort would be required to add new BM Unit registration data fields to the TOMAS manual report template used to produce the 'Registered BMU' spreadsheet.
BSC Website	½ man day's effort would be required to amend the existing explanatory text for the 'Registered BMU' spreadsheet on the CRS Registration Data page (Market Data section).	Same as for Proposed Modification.
CVA Programme	No impact (see Section 5.2).	5 man days' effort would be required to amend the Reporting Catalogue as part of a scheduled Release.  Alternatively, 35 man days' effort would be required to amend the Reporting Catalogue as a stand-alone change.
Corporate Assurance	½ man day's effort would be required to amend BSCCo's Obligations Register.	1 man day's effort would be required to provide assurance to the CVA Programme and amend BSCCo's Obligations Register.

### 4.2 BSC Systems

P169 has no impact upon any BSC Systems or BSC Agents.

### 4.3 Parties and Party Agents

P169 requires no changes to any systems or processes used by Parties. However, P169 impacts Parties to the extent that the names of their BM Units (Proposed Modification) and wider BM Unit registration data (Alternative Modification) would be made available to all interested parties via the BSC Website. Publication of this data may also aid Parties in carrying out certain activities, such as undertaking market analysis and monitoring their own data.

P169 has no impact on any Party Agents.

## 5 IMPACT ON CODE AND DOCUMENTATION

### 5.1 Balancing and Settlement Code

Code Section	Impact of Proposed Modification	Impact of Alternative Modification
Section V 'Reporting'	Addition of BM Unit names to the CRS registration data set out in V4.2.3, in order to expressly allow this data to be published on the BSC Website.	Addition of BM Unit registration data (as provided to BSCCo in the Operations Registration Report) to the CRS registration data set out in V4.2.3, in order to expressly allow this data to be published on the BSC Website.

### 5.2 Code Subsidiary Documents

Document	Impact of Proposed Modification	Impact of Alternative Modification
Reporting Catalogue	No impact (see below).	Addition of list of BM Unit registration data to Section 8.1 'BSCCo Reports Published on BSC Website'.

The Panel noted that Section 8 of the Reporting Catalogue details the data items within those BSCCo reports which are published on the BSC Website in accordance with Section V.

However, the Panel noted that the Reporting Catalogue already erroneously refers to publication of BM Unit names, although these are not currently published since this is not provided for by Section V. Although the Reporting Catalogue therefore conflicts with Section V and with BSCCo's actual reporting, the Panel noted that the result of this erroneous inclusion is that no changes would be required to the Reporting Catalogue for the Proposed Modification (should P169 not be made, BSCCo intends to remove the erroneous Reporting Catalogue reference to BM Unit names via an opportune Change Proposal).

The Panel noted that changes would, however, be required to the Reporting Catalogue as a result of the Alternative Modification, in order to add additional BM Unit registration data to the list of BSCCo reports which are published on the BSC Website. The Panel noted that, as a result, the implementation costs of the Alternative Modification are greater than those for the Proposed Modification – but that the costs of the Alternative Modification P169 would be the same as for P168.

### 5.3 BSCCo Memorandum and Articles of Association

No impact identified.

### 5.4 Impact on Core Industry Documents and supporting arrangements

No impact identified.

## 6 SUMMARY OF REPORT PHASE CONSULTATION RESPONSES

4 responses (representing 35 BSC Parties) were received to the P169 Report Phase consultation.

A summary of the consultation responses is provided below, with the Panel's discussions of these responses contained in Section 6.5. Full copies of the responses are attached as Annex 4.

	Consultation question	Yes	No	No comment
1.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that the Alternative Modification P169 <b>should</b> be made?	4 (35)	0	0
2.	Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that the Proposed Modification P169 <b>should not</b> be made?	4 (35)	0	0
3.	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?	3 (34)	0	1 (1)
5.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P169?	4 (35)	0	0
4.	Are there any further comments on P169 that you wish to make?	1 (1)	3 (34)	0

### 6.1 Panel's provisional recommendation

All respondents to the Report Phase consultation unanimously agreed with the Panel's provisional recommendation that the Alternative Modification P169 should be made, and that the Proposed Modification P169 should not be made.

One respondent (although of the view that the Proposed Modification would also better facilitate the Applicable BSC Objectives) noted that the Alternative Modification would provide a greater level of information, and therefore considered that the Alternative would enhance transparency and competition to a higher degree than the Proposed Modification.

### 6.2 Draft legal text

Those respondents who commented on the draft legal text for the Proposed and Alternative Modifications unanimously agreed that the proposed text correctly addressed the issue identified in the Modification Proposal.

No respondents had any further comments on the proposed text.

### 6.3 Recommended Implementation Date

All respondents unanimously agreed with the provisional Implementation Dates proposed by the Panel for the Proposed and Alternative Modifications.

No respondents had any further comment on the proposed dates.

### 6.4 Further comments

One respondent noted that implementation of the Alternative Modification P169 would remove the requirement for P168.

## 6.5 Comments and views of the Panel

The Panel noted the responses received to the P169 Report Phase consultation, and that these contained new no arguments.

## 7 SUMMARY OF TRANSMISSION COMPANY ANALYSIS

### 7.1 Analysis

A Transmission Company analysis and impact assessment was commissioned during the Assessment Procedure for P169, and is summarised below:

- The Transmission Company did not believe either the Proposed or Alternative Modifications for P169 to have any impact on its ability to discharge its responsibilities under the Transmission Licence, its systems or processes, or any Core Industry Document.
- The Transmission Company expressed its view that the Proposed Modification P169 would better facilitate Applicable BSC Objective (c) by increasing the overall transparency of the market.
- The Transmission Company considered that it was more appropriate for Parties to comment on the merits of publishing a wider spectrum of their BM Unit registration data under the potential Alternative Modification. However, the Transmission Company supported the general principle of transparency, and suggested that Party information should be made available to all industry participants unless there was a steadfast reason for it to remain confidential.
- The Transmission Company confirmed that its assessment applied on a GB-wide basis.

For more information regarding the Transmission Company's response, please refer to the P169 Assessment Report in Annex 3.

### 7.2 Comments and views of the Panel

The Panel noted the analysis and views of the Transmission Company.

## 8 SUMMARY OF EXTERNAL ADVICE

None commissioned.

## 9 IMPLEMENTATION APPROACH

### Proposed Modification

The Panel agreed a Code Implementation Date for the Proposed Modification P169 of 10 Working Days after an Authority decision.<sup>4</sup> The Panel noted that no changes to any Code Subsidiary Documents were required as a result of the Proposed Modification, since the Reporting Catalogue already erroneously refers to publication of BM Unit names (see Section 5.2).

### Alternative Modification

The Panel agreed a Code Implementation Date for the Alternative Modification P169 of 10 Working Days after an Authority decision, with the publication of the relevant BM Unit registration data to take effect from this date.<sup>4</sup>

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<sup>4</sup> As the 'Registered BMU' spreadsheet is published every Monday using the previous Friday's data, the first publication of the data would therefore occur on the first Monday following the Code Implementation Date for P169.

The Panel noted that the Alternative Modification P169 would also result in a minor impact on the Reporting Catalogue, since this document reflects the reporting requirements of Section V. The Panel agreed that the changes to the Reporting Catalogue should be implemented at a later opportune stage as part of a scheduled release in order to minimise the cost of these changes. The Panel considered that no risk would result from delaying the Reporting Catalogue changes since the obligations of Section V would take precedence in the event of any perceived inconsistency between the Code and this Code Subsidiary Document.

### **Interaction with P168**

The Panel considered the similarities between the estimated BSCCo implementation effort for the Proposed Modification P169 and for P168. The Panel noted BSCCo's advice that combining the implementation of P168 and the Proposed Modification P169 would incur only the P168 costs, due to the similarities in the solutions (and since the Proposed Modification P169 is estimated to require less effort than P168, since it requires no Reporting Catalogue change).

The Panel noted that the costs of the Alternative Modification P169 were the same as for P168, but that if this Alternative was implemented P168 would no longer be required (since the BM Unit registration data which would be published under the Alternative includes GC and DC values). The Panel asked the Authority to note its preference for the Alternative Modification P169 over P168.

Given the above, the Panel therefore considered that it would be desirable for the Authority to make its decisions regarding P168 and P169 simultaneously. The proposed Implementation Date for P168 is also 10 Working Days following an Authority decision.

## **10 DOCUMENT CONTROL**

### **10.1 Authorities**

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Reviewer</b>	<b>Change Reference</b>
0.1	21/10/04	Kathryn Coffin	BSC Parties/other interested parties	For consultation
0.2	01/11/04	Kathryn Coffin	Sarah Parsons	For technical review
0.3	02/11/04	Kathryn Coffin	Change Delivery	For quality review
0.4	04/11/04	Change Delivery	BSC Panel	For Panel review & approval
1.0	15/11/04	BSC Panel		For Authority decision



## 10.2 References

Ref	Document	Owner	Issue date	Version
1	Initial Written Assessment for Modification Proposal P169 'Publication of BMU names on ELEXON website' <a href="#">ELEXON - Modification Proposal 169</a>	BSCCo	06/08/04	1.0
2	England and Wales Assessment Consultation document for Modification Proposal P169 'Publication of BMU names on ELEXON website' <a href="#">ELEXON - Modification Proposal 169</a>	BSCCo	20/08/04	1.0
3	GB Assessment Consultation document for Modification Proposal P169 'Publication of BMU names on ELEXON website' <a href="#">ELEXON - Modification Proposal 169</a>	BSCCo	02/09/04	2.0
4	Draft Modification Report for Modification Proposal P169 'Publication of BMU names on ELEXON website' <a href="#">ELEXON - Modification Proposal 169</a>	BSCCo	04/11/04	0.4
5	Modification Report for Modification Proposal P168 'Publication of BMU GC and DC values on ELEXON website' <a href="#">ELEXON - Modification Proposal 168</a>	BSCCo	15/11/04	1.0

### ANNEX 1 LEGAL TEXT

Legal text for the Proposed Modification P169 is included as Annex 1A, and is attached as a separate document.

Legal text for the Alternative Modification P169 is also attached as a separate document Annex 1B.

### ANNEX 2 MODIFICATION GROUP DETAILS

Member	Organisation	16/08/04	22/09/04
Roger Salomone	ELEXON (Chairman)	✓	✓
Kathryn Coffin	ELEXON (Lead Analyst)	✓	✓
Melanie Henry	ELEXON (Lawyer)	✓	✓
Robert Owens	SmartestEnergy (Proposer's Alternate)	✓	
Man Kwong Liu	SAIC		✓
Carl Wilkes	Npower	✓	✓
Neil Smith	E.ON UK	✓	✓
Mark Manley	Centrica	✓	✓

Attendee	Organisation	16/08/04	22/09/04
Steve Mackay	Ofgem	✓	✓
Phil Hewitt	EnAppSys	✓	

For details of the P169 MG's Terms of Reference for the Assessment Procedure, please refer to the P169 Assessment Report in Annex 3.

### ANNEX 3 ASSESSMENT REPORT

The P169 Assessment Report is included as Annex 3A, and is attached as a separate document.

### ANNEX 4 REPORT PHASE CONSULTATION RESPONSES

Copies of the responses received to the consultation regarding the P169 draft Modification Report are included as Annex 4A, and are attached as a separate document.

For copies of the responses received to the P169 Assessment Consultation, please refer to Annex 3B.

### ANNEX 5 CLARIFICATION OF COSTS

There are several different types of costs relating to the implementation of Modification Proposals. ELEXON implements the majority of Approved Modifications under its CVA or SVA Release Programmes. These Programmes incur a base overhead which is broadly stable whatever the content of the release. On top of this, each Approved Modification incurs an incremental implementation cost. The table of estimated costs in Section 2 of this report has three columns:

- **Stand Alone Cost** – the cost of delivering the Modification as a stand-alone project outside of a CVA or SVA Release, or the cost of a CVA or SVA Release with no other changes included in the release scope. This is the estimated maximum cost that could be attributed to the Modification's implementation.
- **Incremental Cost** - the cost of adding the Modification to the scope of an existing release. This cost would also represent the potential saving if the Modification was to be removed from the scope of a release before development had started.
- **Tolerance** – the predicted limits of how certain the cost estimates are. The tolerance will be dependent on the complexity and certainty of the solution, and the time allowed for the provision of an impact assessment by the Service Provider(s).

The cost breakdowns are shown below:

PROGRESSING MODIFICATION PROPOSAL	
<b>Meeting Cost</b>	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.
<b>Legal/expert Cost</b>	This is the cost associated with obtaining external expert advice, usually legal advice.
<b>Impact Assessment Cost</b>	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.
<b>ELEXON Resource</b>	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 Procedures.

<b>SERVICE PROVIDER<sup>5</sup> COSTS</b>	
<b>Change Specific Cost</b>	Cost of the Service Provider(s) Systems development and other activities relating specifically to the Modification Proposal.
<b>Release Cost</b>	Fixed cost associated with the development of the Service Provider(s) Systems as part of a release. This cost encompasses all the activities that would be undertaken regardless of the number or complexity of changes in the scope of a release. These activities include Project Management, the production of testing and deployment specifications and reports and various other standard release activities.
<b>Incremental Release Cost</b>	Additional costs on top of base Release Costs for delivering the specific Modification. For instance, the production of a Test Strategy and Test Report requires a certain amount of effort regardless of the number of changes to be tested, but the addition of a specific Modification may increase the scope of the Test Strategy and Test Report and hence incur additional costs.

<b>IMPLEMENTATION COSTS</b>	
<b>External Audit</b>	Allowance for the cost of external audit of the delivery of the release. For CVA BSC Systems Releases this is typically estimated as 10% of the total Service Provider Costs, with a tolerance of +/- 20%. At present the SVA Programme does not use an external auditor, so there is no External Audit cost associated with an SVA BSC Systems Release.
<b>Design Clarifications</b>	Allowance to cover the potential cost of making any amendments to the proposed solution to clarify any ambiguities identified during implementation. This is typically estimated as 5% of the total Service Provider Costs, with a tolerance of +/- 100%.
<b>Additional Resource Costs</b>	<p>Any short-term resource requirements in addition to the ELEXON resource available. For CVA BSC Systems Releases, this is typically only necessary if the proposed solution for a Modification would require more extensive testing than normal, procurements or 'in-house' development.</p> <p>For SVA BSC Systems Releases, this will include the management and operation of the Acceptance Testing and the associated testing environment.</p> <p>This cost relates solely to the short-term employment of contract staff to assist in the implementation of the release.</p>

<sup>5</sup> A Service Provider can be a BSC Agent or a non-BSC Agent, which provides a service or software as part of the BSC and BSC Agent Systems. The Service Provider cost will be the sum of the costs for all Service Providers who are impacted by the release.

<b>Additional Testing and Audit Support Costs</b>	Allowance for external assistance from the Service Provider(s) with testing, test environment and audit activities. Includes such activities as the creation of test environments and the operation of the Participant Test Service (PTS). For CVA BSC Systems Releases, this is typically estimated as £40k per release with a tolerance of +/-25%. For SVA BSC Systems Releases this is estimated on a Modification Proposal basis.
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### TOTAL DEMAND LED IMPLEMENTATION COSTS

This is calculated as the sum of the total Service Provider(s) Cost and the total Implementation Cost. The tolerance associated with the Total Demand Led Implementation Cost is calculated as the weighted average of the individual Service Provider(s) Costs and Implementation Costs tolerances. This tolerance will be rounded to the nearest 5%.

### ELEXON IMPLEMENTATION RESOURCE COSTS

Cost quoted in man days multiplied by project average daily rate, which represents the resources utilised by ELEXON in supporting the implementation of the release. This cost is typically funded from the "ELEXON Operational" budget using existing staff, but there may be instances where the total resources required to deliver a release exceeds the level of available ELEXON resources, in which case additional Demand Led Resources will be required.

The ELEXON Implementation Resource Cost will typically have a tolerance of +/- 5% associated with it.

### ONGOING SUPPORT AND MAINTENANCE COSTS

<b>ELEXON Operational Cost</b>	Cost, in man days per annum multiplied by project average daily rate, of operating the revised systems and processes post implementation.
<b>Service Provider Operation Cost</b>	Cost in £ per annum payable to the Service Provider(s) to cover staffing requirements, software or hardware licensing fees, communications charges or any hardware storage fees associated with the ongoing operation of the revised systems and processes.
<b>Service Provider Maintenance Cost</b>	Cost quoted in £ per annum payable to the Service Provider(s) to cover the maintenance of the amended BSC Systems.