

Draft MODIFICATION REPORT for Modification Proposal P156 Suspending the Implementation of the Zonal Allocation of Transmission Losses

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This document has been distributed in accordance with Section F2.1.10¹ of the Balancing and Settlement Code.

RECOMMENDATIONS

The Balancing and Settlement Code Panel recommends that:

- **Proposed Modification P156 should not be made; and**
- **The Implementation Date should be 1 April 2004, if an Authority determination is received on or before 27 February 2004 or, 23 Working Days after an Authority determination where an Authority determination is received after that date.**

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¹ The current version of the Balancing and Settlement Code (the 'Code') can be found at www.elexon.co.uk/ta/bsc/el_docs/bsc_code.html

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SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

The following parties/documents have been identified as being potentially impacted by Modification Proposal P156.

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

Cost of implementing Proposed Modification:	15 ELEXON man days
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1 DESCRIPTION OF PROPOSED MODIFICATION AND ASSESSMENT AGAINST THE APPLICABLE BSC OBJECTIVES

1.1 Modification Proposal

Modification Proposal P156 'Suspending the Implementation of the Zonal Allocation of Transmission Losses' (P156) was submitted by Scottish Power Energy Management Limited (the 'Proposer') on 19 December 2003. A copy of the Modification Proposal form is attached as Annex 1.

P156 seeks to modify the Balancing and Settlement Code (the 'Code') to prevent the implementation of the combined changes introduced by Approved Modification Proposals P82 'Introduction of Zonal Transmission Losses on an Average Basis' (P82) (Reference 1) and P125 'Apportionment of the Scottish Interconnector Flows to the Northern and North Western GSP Groups for the Purposes of Calculating Losses' (P125) (Reference 2) scheduled for 1 April 2004.

The method to be used to prevent the implementation of 'Average Zonal Transmission Losses' (AZTL), the arrangements due to be introduced by P82 as modified by P125, is not specified - 'withdrawing' and 'disabling' the relevant system and documentation changes are cited as potential methods.

The Proposer believes that implementation of AZTL, as approved by the Authority, will have several negative consequences at variance with the achievement of the Applicable BSC Objectives.

First the alleged, but unproven, benefits that will be introduced by the long term 'economic signals'² of AZTL will be unlikely to be realised over the short period, of one year, for which it appears the arrangements will be in place. Following consultation on AZTL in the BETTA³ context, the DTI announced on 27 June 2003 that the benefits of AZTL were unproven, and in particular that the benefits would outweigh the costs was unproven. As a consequence, the DTI issued a statement indicating that "the Secretary of State and the Minister for Energy, E-Commerce and Postal Services, Stephen Timms, are not minded to designate Average Zonal Transmission Losses as part of the GB BSC". With BETTA scheduled to go live on 1 April 2005, this suggests that the AZTL arrangements will only be operational for one year. According to the Proposer, the probability of such a short period of operation has increased since June 2003. On 11 December 2003, the Energy Bill, which contains the legislation necessary for BETTA, received its second reading in the House of Lords. A milestone which the Authority previously indicated would constitute at point in time at which "the BETTA legislation could be seen to have attained a significant step towards forming part of the legal framework within which Ofgem will operate".

Second, whilst the development costs associated with the implementation of AZTL have already been incurred, work on the systems of market participants to accommodate the new arrangements has yet to be completed. The costs associated with such development work will ultimately be paid for by customers.

In summary, the probability that AZTL will be in place for only a year has increased. The purported benefits of the arrangements, in terms of long term economic signals, are unlikely to be realised over such a short timescale. In addition, market participants are still incurring costs, which will ultimately be paid for by customers, due to ongoing development work to accommodate AZTL. Therefore, given that the BETTA legislation is now progressing through Parliament, the Proposer believes that the implementation of AZTL should be reconsidered.

² In the context of AZTL, the term 'economic signals' has been used to refer to the incentives provided by the differential between zonal Transmission Loss Factors (TLFs) to locate assets within zones where TLFs are comparatively favourable.

³ 'BETTA' refers to the British Electricity Trading and Transmission Arrangements.

According to the Proposer, P156 would better facilitate the achievement of Applicable BSC Objectives (a), (c) and (d) which are as follows:

- Applicable BSC Objective (a): 'the efficient discharge by the licensee of the obligations imposed upon it by this licence';
- 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'; and
- Applicable BSC Objective (d): 'promoting efficiency in the implementation and administration of the balancing and settlement arrangements'.

Under Applicable BSC Objective (a), the Transmission Company is charged with the efficient discharge of obligations imposed upon it under the Transmission Licence. According to the Proposer, incurring costs, through the ongoing development work for AZTL amongst market participants, for no or negligible benefit, owing to the short period for which the AZTL arrangements will be operational, is counter to Applicable BSC Objective (a). Therefore, the immediate cessation of the implementation of AZTL and its removal from the trading arrangements, through P156, would better facilitate achievement of Applicable BSC Objective (a).

Under Applicable BSC Objective (c), the trading arrangements should promote competition in the various sectors of the electricity market. According to the Proposer, the redistribution of the costs attributed to transmission losses between market participants for the twelve month period for which it appears AZTL will be in place will distort competition in the market through temporary gains and losses. In addition, the removal of AZTL would "increase confidence in the shape of the GB market going forward, thereby reducing the perceptions of risk, and hence cost, faced by all participants in the GB market". Therefore, the removal of AZTL from the trading arrangements, through P156, would better facilitate achievement of Applicable BSC Objective (c).

Under Applicable BSC Objective (d), efficiency in the implementation and administration of the balancing and settlement arrangements should be promoted. According to the Proposer, the continuing development costs being incurred by market participants to accommodate AZTL, the costs that will be incurred to reverse the changes introduced by AZTL for BETTA Go-Live and the additional costs which might be incurred in preparation for the potential extension of AZTL to cover Scotland (e.g. the additional cost and complexity of requiring different loss allocation systems in the NETA live systems and the BETTA test systems) run counter to Applicable BSC Objective (d). Therefore, the immediate cessation of the implementation of AZTL and its removal from the trading arrangements, through P156, would better facilitate achievement of Applicable BSC Objective (d).

BSCCo prepared an Initial Written Assessment (IWA), which was presented to the Panel at its meeting on 15 January 2004. By a majority, the Panel agreed with BSCCo's recommendation that P156 proceed directly to the Report Phase with a provisional recommendation that it should be rejected. The rationale for the Panel's recommendation, and the discussion of the issues raised by P156, is documented in Section 2 of this report.

1.2 Request for Urgency

The Proposer requested that P156 be treated as urgent. The procedure for granting urgent status is described in F 2.9 of the Code. The initial requirement is that 'the Transmission Company and/or BSCCo recommend to the Panel Chairman that a proposal should be treated as an Urgent Modification Proposal'.

BSCCo believed that P156 does not meet the criteria previously applied to determine that a Modification Proposal should be granted Urgent status. Progressing P156 according to the normal Modification

Procedure timetable would not pose a risk to the integrity of the settlement process, impose disproportionate costs or introduce uncertainty. Moreover, BSCCo believed that P156 could be processed, without Urgent status, such that a determination could be received in sufficient time prior to the 1 April 2004 AZTL Implementation Date, to prevent implementation of those arrangements.

1.3 Proposed Modification

Details of the proposed Modification are as outlined within the Modification Proposal. (See annex 1 of the Initial Written Assessment).

1.4 Issues raised by the Proposed Modification

BSCCo's IWA identified the following issues:

- **Issue One:** the Authority determinations on P82 and P125 concluded that both would better facilitate the achievement of the Applicable BSC Objectives. No new issues relevant to the England and Wales Code have been raised by P156. The Proposer cites the fact that Scottish generators have made location and investment decisions based upon the separate Scottish trading arrangements and, that therefore, it would be discriminatory to apply AZTL to those generators. However, BSCCo believes that consideration of decisions made under the Scottish trading arrangements and of the implications of extending NETA to Scotland are outside the scope of the BSC.
- **Issue Two:** no Code changes, relevant to AZTL, have taken place since Modification Proposal P134 'The Halting of Unnecessary and Inefficient Work and Expenditure Associated with Approved BSC Modification P82' (P134) (Reference 3) was rejected by the Authority on 18 September 2003. P134, like P156, sought to remove the effect of AZTL. The Proposer cites the Second Reading of the Energy Bill in Parliament as a relevant development. However, BSCCo believes that the entry into and progression through the Parliamentary process of a Government Bill is outside the scope of the Code. Moreover, there is still no certainty regarding the outcome of that process or the BETTA Go-Live date.
- **Issue Three:** all central system development costs associated with the implementation of AZTL have already been incurred. Several of the central system and process changes made to give effect to AZTL would need to be disabled or removed to implement P156. The time and cost associated with this activity would depend on the method used to remove the effect of AZTL and, as mentioned previously, no method is specified under P156. Under certain methods, costs could be considerable.
- **Impact Four:** any modifications or enhancements already made to Party systems and processes would be made redundant by implementation of P156. However, any costs associated with developments yet to be made or completed would be avoided were P156 implemented.

1.5 Assessment of the Proposed Modification against the Applicable BSC Objectives

An Assessment Procedure was not undertaken; therefore P156 was not assessed by a Modification Group.

1.6 Modification Group's cost benefit analysis of Proposed Modification

An Assessment Procedure was not undertaken; therefore P156 was not assessed by a Modification Group.

1.7 Alternative Modification

An Assessment Procedure was not undertaken; therefore no Alternative Modification could have been developed.

1.8 Governance and regulatory framework assessment

The Proposer is of the opinion that AZTL needs to be reconsidered in light of the evolving statutory framework within which the Code exists. The second reading of the Energy Bill in Parliament, in December 2003, has increased the probability that BETTA will Go-Live on 1 April 2005 and that, therefore, AZTL will only be operational for a year. A period of time which the Proposer believes fundamentally alters the cost-benefit analysis of AZTL.

The majority of the Panel acknowledged the change in the political environment cited by the Proposer, but concluded that assessing the implications of the change was outside the vires of both a Modification Group and the Panel.

2 RATIONALE FOR PANEL'S RECOMMENDATIONS

The Panel considered P156, and ELEXON's IWA of P156, at its 15 January 2004 meeting.

The Panel, unanimously, determined that P156 should be submitted to the Report Phase. The rationale for this determination was threefold. First, all Panel members believed that the recommendation which ought to be made to the Authority was self evident, although members differed as to what that recommendation should be (see below). Second, P156 ought to be expedited through the Modification Procedure so as to minimise any further uncertainty regarding the future of the zonal transmission loss arrangements amongst market participants. Finally, neither of the alternative options available to the Panel – submission to a Definition Procedure or to an Assessment Procedure – would have been appropriate. P156 was deemed sufficiently well defined not to warrant further definition and it was not obvious what issues, within the scope of the England and Wales BSC, could be assessed by a Modification Group which had not already been considered during either the assessment of P82 or the P134 Report Phase.

Five Panel members were of the opinion that P156 would not better facilitate achievement of the Applicable BSC Objectives. These members noted that the Authority determined that P82 would better facilitate the achievement of the Applicable BSC Objectives and shared ELEXON's view that, from the perspective of the England and Wales BSC, no new issues had been raised by 156. As a consequence, there were no grounds upon which to re-evaluate the merits of zonal transmission losses.

Some of those members were of the view that a material change in the political circumstances surrounding zonal losses had occurred with the second reading of the Energy Bill in Parliament, but concluded that assessing the implications of such a change was outside the vires of both a Modification Group and the Panel. In addition, it was noted that the Authority, in considering Modification Proposals, already had a broader remit than the Panel by virtue of its wider statutory duties and so would have the ability to assess P156 in a wider context. Additionally, the Authority was now consulting on proposed modifications in a Great Britain context and had just announced that it would conduct Regulatory Impact Assessments on 'significant' Modification Proposals.

Three Panel members were of the opinion that P156 would better facilitate achievement of Applicable BSC Objectives (c) and (d). These members shared the view of the Proposer that, on the basis of the statement made by the Secretary of State that she was 'minded' not to designate zonal transmission losses as part of the GB BSC coupled with the progress of the Energy Bill through Parliament, there was now a greater probability that the zonal losses arrangements would be in place for only a short period of time (i.e. between their implementation on 1 April 2004 and the scheduled BETTA Go-Live date of 1

April 2005). As a consequence, these Panel members felt that the cost-benefit analysis fundamentally altered – a short life-time for the arrangements would deliver none of the purported long-term benefits and would only serve to distort competition in the-short term.

In summary, the Panel, by a majority of five to three, made the provisional recommendation that P156 should not be made.

3 IMPACT ON BSC SYSTEMS AND PARTIES

As part of BSCCo's IWA, an assessment of the impact of P156 on BSCCo, BSC Systems and Parties was undertaken.

3.1 BSCCo

BSCCo identified the following impacts on its systems, processes and operations:

Area of Business	Potential Impact of Proposed Modification
BSCCo Systems	AZTL processes would need to be removed from the Business Process Model and the AZTL page on the BSC Website withdrawn.
BSCCo Procedures	BSCCo calculation of the zonal TLF applicable to Scottish Interconnector and production of the Network Mapping Statement would need to be discontinued.
BSCCo Contracts (Excluding BSC Agent Contracts)	The contract with the TLFA Modelling Reviewer would need to be terminated.
Other (e.g. costs, staffing, etc.)	Time and effort would need to be expended to disable or remove the documentation and system changes associated with P82, as modified by P125. However, the level of that effort and the time taken is dependent on the method adopted.

3.2 BSC Systems

The following potential impacts were identified:

BSC System / Process	Potential Impact of Proposed Modification
Collection and Aggregation of Metered Data	The bespoke software developed by the Central Data Collection Agent (CDCA), to provide an extract of Metered Volumes for the sample Settlement Periods required by the Transmission Loss Factor Agent (TFLA), would have to be disabled or removed.
Settlement	The SAA would need to be instructed to set TLFs to zero for the purposes of Settlement if P156 were implemented after 1 April 2004.
Registration	The Central Registration Agent (CRA) would need to set TLFs to zero. Note that BM Unit zonal TLFs (i.e. non-zero TLFs) are due to be loaded into the CRA systems in March 2004. If an Authority determination in favour of P156 is received after the TLFs have been loaded, CRA would need to be instructed to load a file of zero TLFs into its systems for the purposes of Settlement.

BSC System / Process	Potential Impact of Proposed Modification
Reporting	Reporting functionality associated (e.g. enhancements made to BMRS) with AZTL would have to be disabled or removed from the central systems.
Generation of Zonal Transmission Loss Factors	<p>Depending upon the timing of an Authority determination in favour of P156, the generation of zonal TLFs by the TLFA for use in BSC Year 2005/6 might need to be halted. BSCCo is scheduled to enter into a contract with the TLFA to generate zonal TLFs for use in BSC Year 2005/6, and notice must be given to the TLFA should BSCCo wish not to enter in that contract.</p> <p>In addition, production of AZTL-based ETLMOs would need to be discontinued.</p>

The nature and materiality of the impact on central systems and processes is dependent on the method used to remove the effect of AZTL from the trading arrangements. No method was specified as part of the Modification Proposal. BSCCo recommends a low-impact solution to enable P156 to be implemented on 1 April 2004. The following solution is recommended

- Removal of AZTL-specific text is removed from all outward facing and published documentation;
- No removal of AZTL functionality from BSC Agent software/systems;
- Amendment to BSC Agent documentation through footnotes; and
- Provide CRA with a file comprising TLFs of zero and instruct the CRA to load that file (if an Authority determination is received after the CRA has loaded non-zero TLFs into its systems).

BSCCo estimates that implementation of the above solution will require a lead-time of 23 working days and 15 Man Days of ELEXON Effort.

Note that BSCCo proposes implementation of P156 on a Settlement Day basis, such that implementation after 1 April 2004 would result in Settlement having been carried out with non-zero TLFs for the interim period.

3.3 Parties and Party Agents

The following impacts were identified:

System / Process	Potential Impact of Proposed Modification
Transmission Company Provision of Network Data	The Transmission Company would no longer be required to compile and provide the TLFA with network data for use in the Load Flow Model each BSC Year.
Transmission Company technical advice on Network Mapping Statement	The Transmission Company would no longer be required to provide technical advice on the Network Mapping Statement.
Party AZTL Modifications	Any modifications or enhancements already made to Party systems and processes would be made redundant by implementation of P156. However, any costs associated with developments yet to be made or completed would be avoided were P156 implemented.

4 IMPACT ON CODE AND DOCUMENTATION

As part of BSCCo's IWA, an assessment of the impact of P156 on the Code, Code Subsidiary Documents and other Configurable Items was undertaken.

4.1 Balancing and Settlement Code

The following impacts on the Code were identified:

Code Section	Potential Impact of Proposed Modification
E	The definition of the TLFA would need to be removed.
H	Reference to the Load Flow Model would need to be removed.
T	Annex T-2, and reference to that Annex within Section T, would have to be removed. Annex T-2 provides a high-level description of the 'Transmission Loss Factor Methodology' and the 'Load Flow Model' used to generate zonal TLFs.
V	The reporting requirements of the TLFA would need to be removed.
Annexes X-1 & X-2	The additional definitions, introduced by P82 as modified by P125 into these two annexes, would need to be removed.

4.2 Code Subsidiary Documents

The following impacts on Code Subsidiary Documents were identified:

Item	Potential Impact of Proposed Modification
BSCP01	BSCP01 – 'Overview of Trading Arrangement – Remove changes introduced by P82
BSCP15	BSCP15 - 'BM Unit Registration' - update required to remove obligation on the CRA to notify TLFA of registration of new BM Units and de-registration of existing BM Units – Remove changes introduced by P82
BSCP20	BSCP20 – Registration, Commissioning and Proving of Metering Systems for CVA – Remove changes introduced by P82
BSCP38	BSCP38 – Authorisations – Remove changes introduced by P82
BSCP41	BSCP41 – Report Requests and Authorisation – Remove changes introduced by P82.
BSCP42	BSCP42 'Business Continuity' – Remove changes introduced by P82
TLFA Service Description	The TLFA Service Description would become redundant and would need to be discontinued.
CRA Service Description	Remove changes introduced by P82
CDCA Service Description	Remove changes introduced by P82
SAA Service Description	Remove changes introduced by P82

NETA Data File Catalogue	Remove changes introduced by P82
Reporting Catalogue	Remove changes introduced by P82
Communications Requirements Document	Remove changes introduced by P82

4.3 Other Configurable Items

The following impacts on other Configurable Items were identified:

Item	Potential Impact of Proposed Modification
CDCA User Requirements Specification	Remove changes introduced by P82, as modified by P125.
CRA User Requirements Specification	Remove changes introduced by P82, as modified by P125.
Interface Definition & Design Document (IDD)	Any changes made to support P82, as modified by P125, would need to be removed.
TLFA Documentation	All TLFA documentation would need to be discontinued.
Network Mapping Statement	The Network Mapping Statement, maintained by BSCCo, would need to be discontinued.

4.4 BSCCo Memorandum and Articles of Association

No impact was identified by BSCCO.

4.5 Impact on Core Industry Documents and supporting arrangements

No impact was identified by BSCCO.

5 SUMMARY OF CONSULTATIONS

Consultation question	Respondent agrees	Respondent disagrees	Opinion unexpressed
Do you agree with the Panel's views on P156 and the provisional recommendation to the Authority contained in the draft Modification Report that P156 should be not made?			
Do you agree with that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal?			

Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P156?			
Are there any further comments on P156 that you wish to make?			

5.1 Summary of the consultation responses

[To be inserted once received]

5.2 Comments and views of the Panel

[To be inserted once received]

6 SUMMARY OF TRANSMISSION COMPANY ANALYSIS

Since P156 proceeded directly from the IWA stage to the Report Phase, no analysis was sought from the Transmission Company.

7 SUMMARY OF EXTERNAL ADVICE

No external advice was sought on P156.

8 IMPLEMENTATION APPROACH

The nature and materiality of the impact on central systems and processes is dependent on the method used to remove the effect of AZTL from the trading arrangements. No method was specified as part of the Modification Proposal. BSCCo recommends a low-impact solution to enable P156 to be implemented on 1 April 2004. The following solution is recommended

- Removal of AZTL-specific text is removed from all outward facing and published documentation;
- No removal of AZTL functionality from BSC Agent software/systems;
- Amendment to BSC Agent documentation through footnotes; and
- Provide CRA with a file comprising TLFs of zero and instruct the CRA to load that file (if an Authority determination is received after the CRA has loaded non-zero TLFs into its systems).

BSCCo estimates that implementation of the above solution will require a lead-time of 23 working days and 15 Man Days of ELEXON Effort.

9 DOCUMENT CONTROL

9.1 Authorities

Version	Date	Author	Reviewer	Change Reference
0.1	21.01.04	Roger Salomone	Sarah Parsons	For Change Delivery Review
0.2	22.01.04	Roger Salomone	Industry	For Consultation

9.2 References

Ref	Document	Owner	Issue date	Version
1	Modification Proposal P82	-	3 May 2002	-
2	Modification Proposal P125	-	31 March 2003	-

3	Modification Proposal P134	-	30 June 2003	-
4	Modification Proposal P156 IWA	ELEXON	9 January 2004	1.0

ANNEX 1 DRAFT LEGAL TEXT

See separate attachment

ANNEX 2 CONSULTATION RESPONSES

[To be attached once received]