

Final MODIFICATION REPORT for Modification Proposal P151 Housekeeping Modification

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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:

- **Modification P151 should be made; and**
- **That P151 should be made with an Implementation Date of 10 Working Days following the Authority decision.**

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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/bscrel_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 P151

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 checked="" type="checkbox"/>	BSC Service Descriptions <input type="checkbox"/>
Transmission Company <input type="checkbox"/>	D <input 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 checked="" type="checkbox"/>	Communication Requirements Documents <input type="checkbox"/>
Party Agents		
Data Aggregators <input type="checkbox"/>	G <input type="checkbox"/>	Reporting Catalogue <input type="checkbox"/>
Data Collectors <input type="checkbox"/>	H <input 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 checked="" type="checkbox"/>	Supplemental Agreements <input type="checkbox"/>
BSC Agents		
SAA <input type="checkbox"/>	M <input checked="" type="checkbox"/>	Ancillary Services Agreements <input type="checkbox"/>
FAA <input type="checkbox"/>	N <input type="checkbox"/>	Master Registration Agreement <input type="checkbox"/>
BMRA <input 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 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 type="checkbox"/>	S <input checked="" 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 checked="" type="checkbox"/>	Distribution Connection Agreements <input type="checkbox"/>
BSC Auditor <input type="checkbox"/>	V <input type="checkbox"/>	BSCCo
Profile Administrator <input type="checkbox"/>	W <input checked="" type="checkbox"/>	Internal Working Procedures <input 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 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

Estimated cost for progressing P151 through Modification Procedures	10 ELEXON man days
Cost of implementing Proposed Modification: Change specific Operational/maintenance	£0 10 ELEXON man days
Total:	10 ELEXON man days

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

1.1 Modification Proposal

Modification Proposal P151 'Housekeeping Modification' (P151) was raised on 28 November 2003 by the BSC Panel, on the recommendation of ELEXON.

P151 identifies a number of minor inconsistencies, typographical errors and omissions identified in the Balancing and Settlement Code (Code) and represents a consolidation of the various 'housekeeping' changes required to rectify these defects.

1.2 Proposed Modification

P151 proposes to rectify minor inconsistencies, typographical errors and omissions within 9 sections of the Code.

1.3 Issues raised by the Proposed Modification

An initial assessment of Modification Proposal P151 has identified that there are no potential areas of impact other than the Code itself, and no issues which will need to be considered and addressed in progressing the Modification Proposal. The Panel noted an interaction with P131 'Introduction of further provisions relating to the determination of Trading Disputes' which changes parts of Section W. These are minor changes which will not affect P151. However, if P131 is approved prior to the approval of P151 then the housekeeping changes to Section W will be redundant.

1.4 Assessment of how the Proposed Modification will better facilitate the Applicable BSC Objectives

P151 was raised by the BSC Panel in accordance with section F2.1.1(d)(iv) of the Code to rectify minor inconsistencies, typographical errors or omissions. The Panel believe that P151 would better facilitate BSC Objective (d):

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

2 RATIONALE FOR PANEL'S RECOMMENDATIONS

This modification seeks to address a number of minor inconsistencies, typographical errors and omissions within the Code. If unremedied, these errors, inconsistencies and omissions may lead to misunderstandings and confusion, which could potentially impact a Party's understanding of the operation of the Code. Addressing these defects periodically, via a consolidated housekeeping modification, is a more robust and efficient way of administering arrangements than addressing each individually when identified or awaiting individual disputes and issues to arise. Clearly it is also in all Parties' general interests that the Code is as accurate and internally consistent as possible.

The Panel therefore believes that this modification would better facilitate the achievement of the Applicable BSC Objectives contained in Condition 7A of the Transmission Licence. In particular, the modification is justified with reference to the objective in Condition 7A(3)(d) (*promoting efficiency in the implementation and administration of the balancing and settlement arrangements*). The proposal has no impact on any of the other objectives, as set out in Condition 7A(3)(a) to (c).

3 IMPACT ON BSC SYSTEMS AND PARTIES

The suggested changes have no systems impact. The effect of the changes is to increase efficiency in the administration of BSC processes and, accordingly, they have been raised under Section C3.8.8 of the Code with a view to better achieving the objective in Condition 7A(3)(d) of the Transmission Licence.

4 IMPACT ON CODE AND DOCUMENTATION

4.1 Balancing and Settlement Code

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

Item	Potential Impact of Proposed Modification
Section C	Changes to address minor inconsistencies, typographical errors or omissions
Section F	Changes to address minor inconsistencies, typographical errors or omissions
Section L	Changes to address minor inconsistencies, typographical errors or omissions
Section M	Changes to address minor inconsistencies, typographical errors or omissions
Section S	Changes to address minor inconsistencies, typographical errors or omissions
Section T	Changes to address minor inconsistencies, typographical errors or omissions
Section U	Changes to address minor inconsistencies, typographical errors or omissions
Section W	Changes to address minor inconsistencies, typographical errors or omissions
Annex X-1	Changes to address minor inconsistencies, typographical errors or omissions

4.2 Code Subsidiary Documents

No impact identified.

4.3 BSCCo Memorandum and Articles of Association

No impact identified.

4.4 Impact on Core Industry Documents and supporting arrangements

No impact identified.

5 SUMMARY OF CONSULTATIONS

Consultation question	Respondent agrees	Respondent disagrees	Opinion unexpressed
Do you agree with the Panel's views on P151 and the provisional recommendation to the Authority contained in the draft Modification Report that P151 should be made?	6		1
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 1 (see section 5.1) 1 (see section 5.1)		2
Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P151?	6		1
Are there any further comments on P151 that you wish to make?	4 had no further comments 1 had comments (see section 5.1)		2

5.1 Summary of the consultation responses

7 responses (26 Parties) were received to the consultation on the draft Modification Report.

In response to the first consultation question 6 respondents (25 Parties) expressed support for the Proposed Modification. Of these, 2 respondents based their views on specific issues relating to the proposed Code drafting being addressed (see responses to the second consultation question below). 1 respondent (1 Party) expressed 'No Comment'.

In response to the second consultation question, 1 respondent suggested a number of amendments to the proposed legal drafting. Two of the suggested changes are minor omissions and have therefore been incorporated into the final legal drafting. One issue could not be implemented as this sub sections of the Code was not being changed. However, the proposed change will be incorporated into a future Housekeeping Modification. A further proposed change has been discussed with the respondent and the comment has now been withdrawn.

Another respondent also identified a number of further minor typographical errors affecting the same sub section of the Code as P151. These have been addressed in the final legal drafting. A further suggested change has not been implemented, the reasons for this have been agreed with the respondent concerned.

In response to the third consultation question, 6 respondents (25 Parties), who expressed a view on the Implementation Date, agreed with the Implementation Date proposed within the draft Modification Report.

- Finally, and in response to the final consultation question, some concern was raised by 1 respondent with regard to 2 of the changes as it was felt that although the change was desirable, it was not clear to them that the change met with ELEXON's usual strict criteria for classification as a Housekeeping Modification. This has been noted but ELEXON do believe that these changes were suitable for inclusion.

6 SUMMARY OF TRANSMISSION COMPANY ANALYSIS

None commissioned as no assessment procedure required.

7 SUMMARY OF EXTERNAL ADVICE

No external advice sought.

8 IMPLEMENTATION APPROACH

The changes will be implemented on a 'stand-alone' basis 10 working days following the Authority's decision.

9 DOCUMENT CONTROL

9.1 Authorities

Version	Date	Author	Reviewer	Change Reference
0.1	15/12/03	Lisa Molloghan	David Osborne	For review
0.2	17/12/03	Lisa Molloghan	Change Delivery	For Consultation
0.3	09/01/04	Lisa Molloghan	BSC Panel	For Panel Decision
1.0	16/01/04	Lisa Molloghan	Change Delivery	For Authority Decision

ANNEX 1 LEGAL TEXT

- Text for Proposed Modification attached as a separate document.
- Note 1: There is an interaction with P131 'Introduction of further provisions relating to the determination of Trading Disputes' which changes parts of Section W. These are minor changes which will not affect P151. However, if P131 is approved prior to the approval of P151 then the housekeeping changes to Section W will be redundant.

ANNEX 2 CONSULTATION RESPONSES

Responses from P151 Draft Report Consultation

Consultation issued on 18 December 2003.

Representations were received from the following parties:

No	Company	File Number	No. BSC Parties Represented	No. Non-Parties Represented
1.	National Grid	P151_DR_001	1	0
2.	British Gas Trading	P151_DR_002	1	0
3.	EDF Energy Trading Networks	P151_DR_003	9	0
4.	Scottish Power UK Plc	P151_DR_004	6	0
5.	Aquila Networks Plc	P151_DR_005	1	0
6.	British Energy Power & Energy Trading Ltd	P151_DR_006	3	0
7.	Scottish and Southern Energy	P151_DR_007	5	0

P151_DR_001 – National Grid

Respondent:	Clare Talbot
No. of BSC Parties Represented	One
BSC Parties Represented	National Grid
No. of Non BSC Parties Represented	None
Non BSC Parties represented	None
Role of Respondent	BSC Party

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P151 and the provisional recommendation to the Authority contained in the draft Modification Report that P151 should be made? Please give rationale.	Yes	We support the Panel's provisional recommendation to the Authority that the modification should be made.
2.	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? Please give rationale.	Yes	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P151? Please give rationale.	Yes	As there are no systems impacts resulting from this changes we believe that an implementation date of 10 working days post decision is appropriate.
4.	Are there any further comments on P151 that you wish to make?	No	

P151_DR_002 – British Gas Trading

Dear Sirs,

Re: Modification Proposal P151 – Housekeeping Modification (BSC Panel)

Thank you for the opportunity of responding to this draft modification report considering Modification Proposal P151. British Gas Trading (BGT) agrees with the Panel's provisional recommendation that the Modification Proposal will better facilitate Applicable BSC Objective (d).

BGT concur with the proposed implementation date.

If you have any questions regarding this response please contact me 01753 758137.

Yours faithfully

Mark Manley
Contract Manager

P151_DR_003 EDF Energy Networks plc

Respondent:	Paul Chesterman
No. of BSC Parties Represented	9
BSC Parties Represented	EDF Energy Networks (EPN) plc; EDF Energy Networks (LPN) plc EDF Energy Networks (SPN) plc; EDF Energy (Sutton Bridge Power) EDF Energy (Cottam Power) Ltd; EDF Energy (West Burton Power) Ltd; EDF Energy plc; London Energy plc; Seeboard Energy Limited
No. of Non BSC Parties Represented	
Non BSC Parties represented	
Role of Respondent	Supplier / Generator / Party Agent / Distribution Business

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P151 and the provisional recommendation to the Authority contained in the draft Modification Report that P151 should be made? Please give rationale.	Yes	Although these are only minor problems ensuring BSC is unambiguous reduces possible problems for existing and new parties.
2.	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? Please give rationale.		We are prepared to accept Elexon's guidance over this matter.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P151? Please give rationale.	Yes	Amendments should be introduced to BSC as soon as practicable.
4.	Are there any further comments on P151 that you wish to make?	No	

P151_DR_004 Scottish Power UK Plc

Respondent:	John W Russell (SAIC Ltd)
No. of BSC Parties Represented	6
BSC Parties Represented	Scottish Power UK plc; ScottishPower Energy Management Ltd.; ScottishPower Generation Ltd; ScottishPower Energy Retail Ltd.; SP Transmission Ltd; SP Manweb plc.
No. of Non BSC Parties Represented	0
Non BSC Parties represented	
Role of Respondent	Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P151 and the provisional recommendation to the Authority contained in the draft Modification Report that P151 should be made? Please give rationale.	Yes	We agree that the proposed changes to address a number of minor inconsistencies, typographical errors and omissions within the BSC should be made.
2.	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? Please give rationale.	Yes	We agree that the legal text would appear to be appropriate to address the defects identified in this proposal.
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P151? Please give rationale.	Yes	We agree that due to the minor nature of these changes, with no systems impact, that 10wd is sufficient notification following an Authority decision.
4.	Are there any further comments on P151 that you wish to make?	No	

P151_DR_005 Aquila Networks Plc

Aquila Networks PLC would like to return a response of 'No Comment' to P151 Consultation on Draft Modification Report.

P151_DR_006 British Energy Power & Energy Trading Ltd

Respondent:	
No. of BSC Parties Represented	3
BSC Parties Represented	<i>British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, Eggborough Power Ltd</i>
No. of Non BSC Parties Represented	-
Non BSC Parties represented	-.
Role of Respondent	<i>Supplier/Generator/Trader/Consolidator/Exemptable Generator/Party Agent)</i>

Q	Question	Response	Rationale
1.	Do you agree with the Panel's views on P151 and the provisional recommendation to the Authority contained in the draft Modification Report that P151 should be made?	Yes	Mostly minor typographical and consistency errors which should be corrected at minimum cost. Note comments below in respect of items 10, 12, 16 and 17 of modification proposal appendix 1.
2.	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?	Yes	
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P151?	Yes	
4.	Are there any further comments on P151 that you wish to make?	Yes	See below.

Item 10 of the Modification Proposal appendix and legal text refer to Section W3.3.1 & 3.6.1. W3.6.1(a) also requires typo correction of 'respect if' to 'respect of'.

Item 12 Section L: refers to consequential changes arising from implementation of CP854 revised BSCP514. The Code currently states that certain SVA Meter Operator Agent processes should be carried out in accordance with Party Service Line 110. The modification proposes that a requirement for adherence to BSCP514 should be added. Unless the requirements of BSCP514 are the same as those in Party Service Line 110, this does not appear to meet Elexon's usual strict criteria for classification as a Housekeeping modification, since it could have a commercial impact on the operation of the BSC.

Item 13 Section U1.6.2: Addition of TLFA to list of BSC Agents. For consistency, the legal text should say '..the FAA and the TLFA'. Again, a desirable change but not clear to me that this meets Elexon's usual strict criteria for classification as a Housekeeping modification.

Item 16 refers to formatting changes in section T. T4.5.1(a) reference to QBS also has an obsolete historic markup highlight still showing, following a previous change from QBO to QBS.

Item 17: Section T3.6. The notation k-1 is preferable, indicating the notification notified before the one being considered, being the notation used in the equations themselves, being less able to be "lost" or confused in printing, and being consistent with the SAA Service Description. The SAA URS uses the k- notation, and should be brought into consistency at an opportune time.

P151_DR_007 Scottish and Southern Energy

This response is sent on behalf of Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd.

In relation to the four questions contained within your note of 17th December 2003, and the associated Modification Report for P151, we have the following comments to make:-

Q1 Do you agree with the Panel's views on P151 and the provisional recommendation to the Authority contained in the draft Modification Report that P151 should be made? Please give rationale.

Subject to our comments on the legal text, Yes, we agree with the proposed BSC Panel recommendation to the Authority that Modification Proposal P151 should be made for the reasons outlined in the Modification Report. We believe that P151 will better facilitate the achievement of the Applicable BSC Objectives and it should therefore be approved.

Q2 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? Please give rationale.

We believe there are four amendments needed to the proposed legal text, as follows:-

(i) In respect of the change to Section W paragraph 3.6.1, should the opening line read: -

"Subject to paragraph 3.6.2, a Party may refer a matter that is the subject of a Trading Dispute to arbitration".

(ii) In respect of the change to Section W paragraph 3.6.1, should the change read "or" rather than "and" between the "(a)" and "(b)" sub-paragraphs? If the matter is not referred to the Panel (as indicated in the second sub-paragraph of 3.6.1) then the Panel cannot make a decision (as indicated in the first sub-paragraph of 3.6.1) and therefore the matter cannot be referred to arbitration. This does not appear (by virtue of there being a second sub-paragraph) to be the intention of the text in this paragraph.

(iii) Could it please be clarified where the letter "(b)" shown (in this P151 legal text) in Section W paragraph 3.6.1 appears in the Code? According to Version 5 of Section W this shows paragraph 3.6.1 as having two sub-paragraphs "(a)". Should this therefore be formally shown in the legal text as a change from "(a)" to "(b)" for this P151 Modification Proposal?

(iv) In respect of Section W paragraph 3.5.3 should there be an "or" between the "(a)" and "(b)" sub-paragraphs"?

Q3 Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P151? Please give rationale.

If the Modification Proposal P151 is approved, we agree with the proposed BSC Panel recommendation on the timing for the Implementation Date, as outlined in the Modification Report.

Q4 Are there any further comments on P151 that you wish to make?

Nothing further at this time.

Regards

Scottish and Southern plc