

Draft MODIFICATION REPORT for Modification Proposal P143
Revision of P99 to Halt the Progression of the
Performance Assurance Reporting Monitoring System
(PARMS) Serials, Standards and Supplier Charge
Elements

Prepared by: ELEXON

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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:

- **the Proposed Modification P143 should not be made; and**
- **In the event that the Authority determines that the Proposed Modification Pxx should be made, AGREE an Implementation Date of 2 Working Days after 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/bscresl_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 P143.

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 type="checkbox"/>	C <input type="checkbox"/>	BSC Service Descriptions <input checked="" type="checkbox"/>
Transmission Company <input type="checkbox"/>	D <input type="checkbox"/>	Service Lines <input checked="" type="checkbox"/>
Interconnector <input type="checkbox"/>	E <input type="checkbox"/>	Data Catalogues <input type="checkbox"/>
Distribution System Operators <input type="checkbox"/>	F <input type="checkbox"/>	Communication Requirements Documents <input type="checkbox"/>
Party Agents		
Data Aggregators <input checked="" type="checkbox"/>	G <input type="checkbox"/>	Reporting Catalogue <input type="checkbox"/>
Data Collectors <input checked="" type="checkbox"/>	H <input type="checkbox"/>	MIDS <input type="checkbox"/>
Meter Operator Agents <input checked="" type="checkbox"/>	J <input checked="" 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 type="checkbox"/>	M <input type="checkbox"/>	Ancillary Services Agreements <input type="checkbox"/>
FAA <input type="checkbox"/>	N <input type="checkbox"/>	Master Registration Agreement <input checked="" 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 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 type="checkbox"/>	S <input checked="" type="checkbox"/>	Distribution Codes <input type="checkbox"/>
Teleswitch Agent <input type="checkbox"/>	T <input type="checkbox"/>	Distribution Use of System Agreements <input type="checkbox"/>
SVAA <input checked="" type="checkbox"/>	U <input 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 type="checkbox"/>	Internal Working Procedures <input type="checkbox"/>
Certification Agent <input type="checkbox"/>	X <input type="checkbox"/>	Other Documents
MIDP <input type="checkbox"/>		Transmission Licence <input type="checkbox"/>
TFLA <input type="checkbox"/>		
Other Agents		
SMRA <input checked="" 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:	See Section 3.1
Total:	

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

1.1 Modification Proposal

Modification Proposal P143 "Revision of P99 to halt the progression of the PARMS Serials, Standards and Supplier Charge elements" (P143) was submitted by Centrica on 1 September 2003. P143 was raised following an increase in the estimated costs of implementing Approved Modification P99 "Changes to Accreditation and the PARMS Serials and Standards, resulting from the Performance Assurance Framework (PAF) Review (Phase 1)" (P99).

P99 included the requirement to implement changes to three elements of the PAF: Accreditation; Entry Processes; and Serials and Standards. P143 proposes that work continues on two of these elements, Accreditation and Entry Process, in time for an Implementation Date of 1 May 2004 whilst work on the development of IT systems and associated process associated with Serials and Standards elements of P99 is halted. The Proposed Modification suggested that:

- Supplier Charges are excluded from P99²;
- Serials are removed from the implementation of P99;
- a further review is undertaken relating to the complexity of Serials that are in part responsible for some of the increased costs attributable to P99³; and
- the results of this review be included within a "holistic Modification following a review of Supplier Charges".

The issue or defect with the Balancing and Settlement Code ('the Code') that P143 is aimed to address has been cited as being the complexity of the Serials that P99 introduced to the Code. P143 therefore proposes that as an interim measure the definition of Serials present within the Code before the Approval of P99 is adopted pending approval of the future Modification Proposal.

1.2 History of Modification Proposal P99

A review of the Performance Assurance Framework (PAF) within the Trading Arrangements was initiated in September 2001 by the Balancing and Settlement Code Panel ('the Panel') which used the Risk Assessment Group (RAG) to oversee the review. Phase 1 of the PAF Review focussed on the techniques of Accreditation, Audit, Entry Processes and Serials and Standards. Each technique was analysed by an expert group comprised of industry participants representing a range of market roles, and the findings of the analysis were reported to the RAG and then presented to the Panel for approval on 18 April 2002. The Panel agreed with the recommendations of the PAF Review and requested that these findings be issued to industry for formal consultation.

The majority of industry responses to the consultation supported the PAF Review's recommendations. The relevant expert groups discussed the queries and suggestions raised by respondents to the consultation and where appropriate, actions were taken to modify the PAF review recommendations accordingly.

On 2 September 2002, British Gas Trading raised a Modification Proposal, P99, in order to implement the recommendations of the PAF Review. P99 was aimed at delivering the results of Phase 1 of the PAF Review in a single package. The Initial Written Assessment for P99, was presented to the Panel on

² It should be noted that P99 modified the Serials defined within the Code and that it was not intended to change the way in which Supplier Charges operates, other than to apply them to the revised Serials as appropriate.

³ For the avoidance of doubt a Modification Proposal is not required to instigate a review of Serials within the Code.

12 September 2002 and the Panel agreed to submit Modification Proposal P99 to a two-month Assessment Procedure conducted by the Volume Allocation Standing Modification Group (the Group).

During the Assessment Procedure of P99 the Group met to discuss the responses to the consultation and impact assessment. While the responses were supportive of the Modification Proposal in principle, they highlighted that many respondents required a further level of technical detail before being able to provide a sufficiently detailed impact on their organisation. Consequentially the Group concluded that additional analysis was required and at the Panel meeting on 14 November 2002 requested and was granted, a one-month extension to the Assessment Procedure. As part of the assessment during this additional month additional technical details were specified and the Group also sought to understand the perceived costs and benefits introduced by P99 used this in its assessment of Proposed Modification P99 against the Applicable BSC Objectives.

The Group set out its estimates of the costs likely to be incurred by industry to incorporate P99. This estimate identified one off costs in the range £1m to £3m. The Group also estimated the potential benefit to industry at between £2m and £5m per annum. Whilst cost benefit analysis is not an Applicable BSC Objective, the Group used this information to form part of its overall assessment when determining whether P99 better facilitated the achievement of the Applicable BSC Objectives. The final Assessment Report was presented to the Panel at its meeting on 12 December 2002 and the Panel endorsed the VASMG's recommendation that Proposed Modification P99 should be made based on the better facilitation of the Applicable BSC Objectives. Following confirmation of the Panel's provisional recommendation during the Report Phase a Modification Report was presented to the Authority on 24 January 2003. On 26 February 2003, the Authority directed that P99 should be made with an Implementation Date of 20 January 2004.

Following the initiation of the P99 development project, BSCCo identified a number of issues associated with the implementation of P99 that required further clarification. BSCCo consequently requested that the Panel seek an extension to the Implementation Date as the clarification of these issues would require additional time to implement P99. The Authority subsequently granted an extension to 1 May 2004.

1.3 Proposed Modification

Whilst it could be argued that the Modification Proposal does not fully describe a Proposed Modification, further clarification was sought from the Proposer about the intended effect of the proposal. The Proposer confirmed that the legal text with respect to Serials should revert to the pre-P99 version of the text and that a subsequent Modification Proposal should be raised to deliver any further changes to the definition of Serials within the Code.

1.4 Issues raised by the Proposed Modification

An initial assessment of Modification Proposal P143 was undertaken which identified the following potential areas of impact and issues which may need to be considered when determining which course of action to take with respect to P143. These impacts and issues are detailed below:

- **Definition of Proposed Modification** – The Proposed Modification states that it seeks to halt the implementation work on P99 however it is not clear what changes to the Code are being proposed to achieve this. There are two possibilities: 1) P143 seeks to introduce an as yet undefined new set of rules relating to Serials and Standards in which case further definition of this would be required; or 2) P143 seeks to reverse the changes to the Code that were introduced under P99 with respect to Serials and revert the legal text to the pre-P99 position.

Subsequent to the raising of P143, BSCCo has contacted the Proposer who has confirmed that P143 was intended to propose option 2 above, i.e. they wish the Code to revert back to the Pre-P99 legal text in relation to Serials.

- **Previous consultation in respect of Serials and Standards** - P99 was raised following Phase 1 of the review of the Performance Assurance Framework (PAF). Following this review, a consultation was undertaken to refine the findings of the PAF and this culminated in the raising of P99. During the progression of P99 through the Modification Procedures, further consultations had been initiated with Parties at both the Assessment Procedure stage and the Report Phase. The majority of the consultation responses indicated support for the findings of the PAF review as embodied within P99.
- **Reversion to Pre-P99 Serials** – P99 proposed to reduce the total number of Serials from 63 to a 34. This involved the removal of 50 Serials and the inclusion of a further 21 new Serials. The 50 removed Serials had been removed on the grounds that they were not used due or were meaningless measurements. P143 would see the re-introduction of these removed Serials.
- **Authority determination on P99** – The Authority, in coming to its decision on P99 carefully considered the issues raised in the P99 Modification Report and acknowledged the concerns of respondents relating to the costs of implementing P99. The Authority however also noted that the identified benefits to the operational efficiency and data quality were significant. The Authority also accepted the Modification Group’s opinion that the overall cost of performance assurance would decrease, even if this were not the case of each individual technique. The Authority made its decision having regard to both the Applicable BSC Objectives and its wider statutory obligations. Given the VASMG’s recommendation to approve P99, it is not clear what has changed that would affect that view.
- **Parties may have already commenced work to ensure that they are P99 compliant** – It is possible that Parties will have committed the necessary resource to ensure that the reporting requirements for P99 are fully delivered by the Implementation Date for P99. Any Modification Proposal halting the work on this Modification Proposal may render this work nugatory.
- **Requirement to undertake a review of Serials and Standards** – P143 suggests that a further review of the complex levels of Serials is undertaken. Whilst P143 suggests that a further review of the “complex levels of Serials that are contributing to the escalating costs [of P99]”, should be undertaken, the Proposer has confirmed that P143 should not be delayed whilst this review to concludes. The Panel were therefore being requested to initiate a further review of Serials and Standards. Such a review would have repeated the extensive work carried out by the Serials and Standards expert group within the PAF review.
- **Uncertainty of a future Modification Proposal** – The Proposal suggests that following a review of Supplier Charges together with the review of Serials suggested above a new Modification Proposal could be raised which encompasses the issues related to both Supplier Charges and the complexity of Serials and Standards. Until such a Modification Proposal is raised, it is not clear that such a Proposal will ever be raised nor is there certainty that such a Modification Proposal will be approved by the Authority.
- **Costs of P99** – The Modification Proposal states that the costs of implementing the Serials elements of P99 have increased from £250,000 up to £2.2m (of which £1.8m are demand led costs). It should be noted that the estimated £1.8m demand led costs also includes the costs attributable to the other parts of P99, i.e. Accreditation and Entry Process. This cost does also include an appropriate level of contingency. The detailed costs of implementing P99 are not

yet available as the tendering process for the software development is still underway. However based on the above the cost benefit estimates provided by the Group identified, there would still be a net benefit to industry within less than three years⁴.

- **Interaction with P99 development plans** – In the absence of a decision approving P143, work on the implementation of P99 within BSCCo and its agents will continue according to its current plan. This will likely to include the conclusion of a tendering process and award of contracts for software development for a new Performance Assurance Reporting and Monitoring System (PARMS) which is currently scheduled to occur between the October 2003 and November 2003 Panel meetings. It is also unclear what impact P99 will have on Party and Party Agents own development plans as they may have prepared to amend / decommission their existing reporting systems and committed the resource to create new reporting systems where appropriate.
- **Interaction with P141** – It should be noted that there is an interaction with Modification Proposal P141. Existing PARMS is a fragile IT system, which is not capable of being modified. Any changes to the rules associated with Standards and Serials would require a system to be developed to accommodate them. Were P143 to be approved and in the absence of P141 being approved, it is likely that a system would be required to be built to accommodate the Pre-P99 Serials and Standards for the period between 24 June 2003, and the Implementation Date of P143.
- **Effect of P143 and similar Modifications on future negotiations undertaken by BSCCo and third Parties** – The existence of P143 and/or similar Modification Proposals seeking to halt work on Approved Modifications may have a detrimental effect on the responses to tenders that BSCCo undertake as it may increase penalty clauses that contractors may wish to include within the contracts.

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

At its meeting on 11 September 2003, the Panel determined that in light of:

- the previous consultations in respect of P99;
- its original recommendation in respect of P99, that the P99 Serials better facilitated the achievement of the Applicable BSC Objectives when compared with the Serials that existed prior to P99;
- Authority decision letters with respect to P99; and
- that P143 proposed to revert to a previous version of the definitions of Serials,

the recommendation that the Panel would make, would generally be considered self evident. The Panel concluded that the Applicable BSC Objectives would not be better facilitated by the introduction of P143 and therefore submitted P143 directly to the Report Phase with a recommendation that P143 should not be made.

⁴ This calculation assumed an implementation cost of P99 to be £1.8m of demand led funds added to the worst case costs to industry of £3m. This gives a total cost of £4.8m. If the worst case benefits were taken to be £2m per annum (the lower end of the £2m-5m range) then P99 would still realise the benefits estimated by the VASMG within less than 3 years. The VASMG's estimate of the benefits included an estimate of the value of avoiding Audit qualification and was based on the assumption that the improvements delivered by P99 prove to be useful for at least 2 years.

1.6 Modification Group's cost benefit analysis of Proposed Modification

No cost benefit analysis was undertaken as no Modification Group was appointed to undertake an assessment of P143.

1.7 Governance and regulatory framework assessment

The Panel considered the wider implications of P143 in the context of the statutory, regulatory and contractual framework within which the Code sits, as is required by the Code (Annex F-1, paragraph 1(g)). The Panel were of the opinion that, were P143 to be implemented, there would be no such wider implications.

2 RATIONALE FOR PANEL'S RECOMMENDATIONS

In coming to its decision with respect to P143, the Panel considered the presentation provided by the Proposer as well as the contents of the Initial Written Assessment (IWA).

The Proposer had suggested its ideal solution would be to halt work on P99 as an interim step whilst a thorough review of Serials was made in conjunction with the review of Supplier Charges. The Proposer stated that they had concerns relating to the costs of the P99 development and the transparency of the cost benefit analysis undertaken by the Modification Group in discussing P99. The Proposer noted that it was not possible to achieve its desired outcome within a single Modification Proposal. P143 was therefore raised to change the definition of Serials to its pre-P99 position, as an interim measure, as a means to halting any work in respect of P99 whilst a subsequent Modification Proposal could be raised to develop the eventual solution to the Serials that should be contained within the Code. The Proposer had suggested that P143 should be submitted directly to the Report Phase with a recommendation that P143 should be made. In order to achieve this it would be necessary for the draft Modification Report to contain legal text.

BSCCo presented the IWA which outlined the issues as contained within section 1.4 of this report. BSCCo noted that given the issues identified and in particular the Authority's decision letters in respect of P99, both the original approval and subsequent extension to the timetable, that the cost benefit analysis developed by the VASMG still showed P99 to be beneficial within 3 years. BSCCo also noted that whilst the costs of implementing P99 had increased from that outlined within the P99 Assessment Report, the costs quoted within Modification Proposal P143 may have been misleading. Furthermore BSCCo noted that the costs quoted within the Modification had shown a comparison of the demand led development costs for PARMS with the total project budget (both demand led and operational resources) for the entire project. The P143 IWA also noted that no legal text had been prepared during the development of the IWA and requested that the Panel consult with the Authority to determine if such text was required within any draft Modification Report.

BSCCo also noted that the issue of Supplier Charges was being addressed as Issue 6, currently being progressed by the VASMG.

In discussing whether or not the recommendation of the Panel would generally be considered to be self evident, one Panel member suggested that it may be appropriate to undertake short Definition Procedure to determine what the eventual solution for Serials should be. BSCCo reported that such definition of Serials was outside the scope of P143 as P143 sought to redefine the Serials to that existing within the pre-P99 baseline.

It was suggested that BSCCo could seek a further delay to the Implementation of P99 if this would help resolve the time pressure however one Panel member expressed concern that the Accreditation and Entry Process elements of P99 would also be delayed by any such extension and that this was undesirable.

During the discussion, the Ofgem representative drew attention to the Authority's earlier decision in respect of P99.

In coming to its recommendation that P143 should not be made, the Panel considered the previous decisions in respect of P99 including the evidence of the previous consultation in respect of both P99 and the PAF. The Panel concluded it had originally compared the Serials introduced by P99 with the baseline that existed prior to P99's incorporation into the Code. At that time the Panel concluded that the achievement of the Applicable BSC Objectives would be better facilitated by the introduction of P99. Whilst the Panel expressed concern over the increased cost of P99, it saw no reason to change its original recommendation in respect of the Serials introduced by P99. The Panel concluded therefore that its recommendation would generally be considered to be self evident and that P143 should be submitted directly to the Report Phase with a recommendation that P143 should not be made.

Provision of Legal Text

No Assessment Procedure was undertaken in respect to P143 and as such no legal text was prepared. Paragraph F2.7.3 of the Code states that where no legal text has been prepared in the Assessment Procedure and the recommendation of the Panel is that the Proposed Modification (or Alternative Modification where relevant) is not made, the Panel shall consult with the Authority to determine whether or not the draft Modification Report should contain such text. The Panel sought to consult with the Authority to determine if legal text for the Proposed Modification was required. The Authority representative indicated that there was no requirement for the Authority to give its view on legal text if the Modification Proposal was submitted directly to the Report Stage following the presentation of an IWA.

3 IMPACT ON BSC SYSTEMS AND PARTIES

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

3.1 BSCCo

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

The impacts of P143 on BSCCo will be twofold:

- The P99 development activities associated with Serials and Standards would need to be stopped;
- Procurement of the PARMS developer would need to be halted, or in the case that procurement had completed at the time of the Authority determination, the contract should be terminated; and
- An impact assessment to determine the period during which the existing PARMS could continue to operate without requiring further redevelopment to cater for things such as advances in operating systems and to ensure it is always running on a supported IT platform or changes by way of Modification Proposals. It is also possible that were P143 to be approved and P141 not approved, backdated to 24 June 2003, that a system would be required to be developed that would be capable of calculating the Serials and Supplier Charges from period of 24 June 2003 to the Implementation Date of P143.

3.2 BSC Systems

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

BSC System / Process	Potential Impact of Proposed Modification
Supplier Volume Allocation	As part of P99, any changes required to support the new Serials developed by the Supplier Volume Allocation Agent would no longer be required. A full description of the impacts as a result of the changes required for P99 is contained within Attachment 1.

3.3 Parties and Party Agents

The impact on Party's⁵ and Party Agent's preparation activities to determine the level of resources and impact of commitments already made to ensure their systems are compliant by the P99 Implementation Date.

It should be noted however that P99 was approved on 26 February 2003 with an intended Implementation Date of 20 January 2004, this date was later extended to 1 May 2004. This implies that of the 15 months (12 originally) total available development time available for Parties and Party Agents to undertake changes to their systems seven months have passed.

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 J 'Party Agents'	P99 introduced a new requirement for Supplier Meter Registration Agents (SMRAs) to provide registration data to BSCCo for the purposes of market monitoring – this change would need to be reversed.
Annex S-1 Performance Levels and Supplier Charges	Annex S-1 'Performance Levels and Supplier Charges' would be revised to reflect the new standards and Serials, particularly the Supplier Serials. These changes would no longer be required.

4.2 Code Subsidiary Documents

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

⁵ For the avoidance of doubt this includes the preparation activities being undertaken by Parties will include any work being undertaken by the Supplier Meter Registration Agents in order to support the P99 arrangements.

The following documents all contain references to the set of PARMS Serials and Standards modified by P99 and therefore any changes currently under development would no longer be necessary:

- BSCP536 – Supplier Liquidated Damages
- BSC SVA Data Catalogue (Part 1)
- PSL110 – SVA Meter Operation
- PSL120 – Non Half Hourly Data Collection
- PSL130 – Half Hourly Data Collection
- PSL140 – Non Half Hourly Data Aggregation
- PSL150 – Half Hourly Data Aggregation
- PSL160 – Supplier Meter Registration Service
- PSL170 – Meter Administrator
- PSL180 – CVA Meter Operation
- SSL300 – Supplier Volume Allocation
- SSL310 – Daily Profile Production
- SSL360 – Market Domain Data

In addition to this BSCP533 contains two large appendices: the PARMS File Formats and the Monitoring Implementation Requirements Tables (MIRT). The changes being developed by BSCCO to ensure that the extensive revisions to align them with the P99 Serials will no longer be required. Work is currently underway on these changes.

4.3 Impact on Core Industry Documents and supporting arrangements

An initial assessment has been undertaken in respect of Core Industry Documents and the following documents have been identified as potentially being impacted by the Modification Proposal.

Item	Potential Impact of Proposed Modification
Master Registration Agreement	Under P99 a change was required to the Master Registration Agreement to align with the changes in Section J of the BSC relating to data provision by SMRAs. This change would no longer be necessary.

5 SUMMARY OF CONSULTATIONS

To be completed following the Report Phase consultation

Consultation question	Respondent agrees	Respondent disagrees	Opinion unexpressed
Do you agree with the Panel's views on P143 and the provisional recommendation to the Authority contained in the draft Modification Report that P143 should not be made?			

Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P143?			
Do you believe that there are any impacts that have not been highlighted?			

5.1 Summary of the consultation responses

To be completed following the Report Phase consultation

5.2 Comments and views of the Panel

To be completed following the Report Phase consultation

6 SUMMARY OF TRANSMISSION COMPANY ANALYSIS

6.1 Analysis

None commissioned as no Assessment Procedure was undertaken.

7 SUMMARY OF EXTERNAL ADVICE

None commissioned

8 IMPLEMENTATION APPROACH

On the advice of the BSCCo, the Panel recommends that were P143 to be implemented it should be undertaken two Working Days after an Authority decision in favour of P143. If a decision is made in favour of P143, BSCCo would seek to close down in an orderly manner any work underway on the development of P99.

9 DOCUMENT CONTROL

9.1 Authorities

Version	Date	Author	Reviewer	Change Reference
0.1	22/09/03	Richard Clarke	Change Delivery	

9.2 References

Ref	Document	Owner	Issue date	Version

ANNEX 1 DRAFT LEGAL TEXT

- No legal text has been prepared for P143.

ANNEX 2 MODIFICATION GROUP DETAILS

No Modification Group was used to assess P143

ANNEX 3 CONSULTATION RESPONSES

To be completed following consultation

ANNEX 4 TRANSMISSION COMPANY ANALYSIS

None commissioned

ANNEX 5 BSC AGENT IMPACT ASSESSMENTS

None Commissioned

ANNEX 6 PARTY IMPACT ASSESSMENTS

None Commissioned

ANNEX 7 COST BENEFIT ANALYSIS

None undertaken

ANNEX 8 CORE INDUSTRY DOCUMENT OWNER IMPACT ASSESSMENTS

None Commissioned

ANNEX 9 PROPOSED TEXT TO MODIFY BSCCO MEMORANDUM AND ARTICLES OF ASSOCIATION

None amendments identified

ANNEX 10 TERMS OF REFERENCE AND REPORT/ANALYSIS OF EXTERNAL CONSULTANTS/ADVISORS

None Commissioned