

December 2002

**Modification P107: 'Initial Assessment of
Modification Proposal P107 - Data
Retention Requirements for Post-Final
Trading Dispute' Requirements
Specification**

Document Reference	P107AS
Version no.	1.0
Issue	Final
Date of Issue	13 December 2002
Reason for Issue	Industry consultation
Author	ELEXON

I DOCUMENT CONTROL

a Authorities

Version	Date	Author	Signature	Change Reference
0.1	14/11/02	Change Delivery		For peer review
0.2	22/11/02	Change Delivery		For GSMG review
0.3	05/12/02	Change Delivery		Incorporate GSMG review comments
1.0	13/12/02	Change Delivery		Approved

Version	Date	Reviewer	Signature	Responsibility
0.1	14/11/02	ELEXON		
0.2	22/11/02	GSMG		Ensure consistency with GSMG requirements
0.3	05/12/02	Parties		Incorporate GSMG review comments
1.0	13/12/02	Industry		Industry consultation

b Distribution

Name	Organisation
SSMG	Various
BSC Parties	Various
Party Agents	Various

c Related Documents

Reference 1	Modification Proposal P107 'Data Retention Requirements for Post-Final Trading Disputes' (30 October 2002)
Reference 2	Initial Written Assessment of Modification Proposal P107 'Initial Assessment Of Modification Proposal P107 - Data Retention Requirements for Post-Final Trading Disputes (P107IR V1.0, 8 November 2002)
Reference 3	Modification Report, Modification Proposal P61 – Ad Hoc Adjustments to Settlement involving material errors without resorting to Ad Hoc Settlement Runs (MR 44/004 V2.0, 17 May 2002)
Reference 4	'Respecification of Trading Data' Requirements Specification (P103AS V1.0, 19 November 2002)
Reference 5	BSCP40 'Change Management'
Reference 6	Modification Report, Modification Proposal P63 - Change Of Contract Management of MPAN's For Data Collector, Data Aggregator And Meter Operator (P063RC, V0.3, Issue 1, 28 October 2002)
Reference 7	Ofgem decision letter, P78 'Revised Definitions of System Buy Price and System Sell Price' (Ref: MP No: P78, 9 September 2002)
Reference 8	Modification Report, Modification Proposal P62 - Changes to Facilitate Competitive Supply on the Networks of New Licensed Distributors (P062RR, V1.0, Issue Final, 22 July 2002)

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1 INTRODUCTION

1.1 Background and Scope

This Requirements Specification for Modification Proposal P107 'Data Retention Requirements for Post-Final Trading Disputes' (P107) (Reference 1) forms the basis for an impact assessment of the implementation and associated issues should this Modification Proposal be adopted. This Requirements Specification defines the requirements for implementation of the Modification Proposal. No Alternative Modification Proposal is considered within this Requirements Specification.

P107 was raised by SSE Energy Supply Limited on 30 October 2002, and the Initial Written Assessment (Reference 2) was considered by the Panel at its meeting of 14 November 2002, where the Panel agreed to submit P107 to a three month Assessment Procedure.

P107 seeks to revise the cut-off points for raising a Post Final Trading Query / Trading Dispute and undertaking the Post-Final Settlement Run and Extra-Settlement Determination. In addition, P107 seeks to include specific data retention obligations in support of the Post-Final Trading Disputes process.

On the basis that P107 may impact the majority of the industry and is a governance related Modification Proposal, it is being progressed by the Governance Standing Modification Group (GSMG) (with appropriate expertise being provided by the Settlement Standing Modification Group (SSMG), the Volume Allocation Standing Modification Group (VASMG) and the Trading Dispute Committee (TDC)).

The GSMG met on 22 November 2002, during which time a number of requirements were determined and agreed. This Requirements Specification represents the outcome of this meeting and forms the consultation for P107.

It should be noted however that the GSMG's requirements included within this Requirement Specification may or may not change following analysis of the responses from the industry to the consultation. The GSMG will in January 2003 initiate a Detailed Level Impact Assessment (DLIA) to assess the impact on the industry of the Potential Modification. It may be necessary, as part of this DLIA, to provide an updated version of the Requirements Specification; this would highlight any variation in requirements since the consultation.

In addition, the requirements within this Requirement Specification may change following the conclusions reached by the TDC on correcting data after the Final Settlement Run. The TDC are currently debating this issue and are meeting on 18 December 2002 with a paper being formally presented at the TDC meeting in January 2003. Currently Post-Final Trading Disputes are being corrected at 24 months after the Settlement Day; the proposals within this Requirements Specification are therefore more than sufficient to support the Trading Dispute correction process.

1.2 Purpose and Structure of Document

The primary purpose of this document is to specify the requirements for the requisite changes to central services, BSC Agents, Parties and Party Agents and to the Code, Code Subsidiary Documents and industry documentation, in sufficient detail to enable all impacted BSC Agents, Parties, Party Agents and documentation owners to provide an impact assessment of the changes required to support P107.

A particular purpose of this document is to specify ELEXON's (representing GSMG) requirements for the requisite change to central services functionality in sufficient detail to allow the BSC Agents to provide an initial detailed assessment of the following:

- An assessment of the cost of any changes to the contractual baseline.
- An assessment of the time required to implement the changes.
- A proposed testing strategy for the changes.
- A proposed release and acceptance strategy (e.g. whether to phase the implementation to provide a quick solution to urgent operational issues).

For the purposes of this assessment, the BSC Agents should assume that the changes will be implemented as a standalone development project managed by ELEXON.

The document is structured as follows:

- Section 2 specifies the required functionality for the changes defined within P107.
- Section 3 specifies ELEXON's requirements for involvement in the design and testing process.

1.3 Glossary

The following acronyms have been used throughout this document:

AA	Annualised Advance
BMRA	Balancing Mechanism Reporting Agent
BMRS	Balancing Mechanism Reporting Service
BSC	Balancing and Settlement Code
BSCCo	Balancing and Settlement Code Company
BSCP	Balancing and Settlement Procedure
CDCA	Central Data Collection Agent
CRA	Central Registration Agent
CVA	Central Volume Allocation
DLIA	Detailed Level Impact Assessment
EAC	Estimated Annual Consumption
ECVAA	Energy Contract Volume Aggregation Agent
ECVNA	Energy Contract Volume Notification Agent
EPC	Entry Process Co-ordinator
FAA	Funds Administration Agent
GSMG	Governance Standing Modification Group
HHDC	Half Hourly Data Collector
MDD	Market Domain Data

MVNRA	Metered Volume Notification Reallocation Agent
NHHDA	Non-Half Hourly Data Aggregator
SAA	Settlement Administration Agent
SACR	Self Assessment Certification Return
SMRA	Supplier Meter Registration Agent
SMRS	Supplier Meter Registration Service
SSMG	Settlement Standing Modification Group
SVA	Supplier Volume Allocation
SVAA	Supplier Volume Allocation Agent
SVG	Supplier Volume Allocation Group
TAA	Technical Assurance Agent
TDC	Trading Dispute Committee
VASMG	Volume Allocation Standing Modification Group

1.4 Other Modification Proposals

Approved Modification Proposals

1.4.1 P61 'Ad Hoc Adjustments to Settlement involving material errors without resorting to Ad Hoc Settlement Runs'

P61 was implemented within the BSC on 10 December 2002. P61 introduces the concept of 'Post-Final Settlement Run' and 'Extra Settlement Determinations'¹. On the basis that P61 allows for Trading Query / Trading Dispute corrections via these mechanisms after the Final Settlement Run and P107 proposes changes to the disputes processes after the Final Settlement Run, it is appropriate that this Requirements Specification takes into account the introduction of these concepts as a method for rectifying Trading Queries / Trading Disputes after the Final Settlement Run. The legal text for P61, that is used as a basis for preparing this Requirements Specification, is contained in the 'P61 Modification Report, Annex 2 – Legal text to give effect to the Proposed Modification (Reference 3).

1.4.2 P62 'Changes to Facilitate Competitive Supply on the Networks of New Licensed Distributors'

P62 (Reference 8) will be implemented on 1 August 2003. P62 will enable multiple distributors to exist within each of the existing GSP Groups, and will also require each distributor to be serviced by its own single Supplier Meter Registration Service (SMRS). Therefore these distributors will be affected by any P107 proposals.

¹ The Extra Settlement Determination allows for a Settlement Run (and related Volume Allocation Runs) in relation to a Settlement Day, after the Final Reconciliation Settlement Run and related Final Reconciliation Volume Allocation Run.

1.4.3 P78 'Revised Definition of System Buy Price and System Sell Price'

P78 (Reference 7) will be implemented on 28 February 2003. P78 introduces the concept of Market Index Data Providers, who are non-BSC Agents and instead will have commercial contracts with ELEXON. These Market Index Data Providers will have a relationship with the BSC community and therefore they may be involved in the Trading Dispute process and will have data retention obligations placed upon them. The contractual arrangements placed upon them will need to take account of potential involvement in the Trading Dispute process and will also include appropriate data retention obligations. On the basis that the contractual arrangements for the Market Index Data Providers will be in place prior to the completion of P107, should P107 be approved, there maybe an impact on such contracts.

Modification Proposals Not Yet Approved

1.4.4 P63 'Change Of Contract Management of MPAN's For Data Collector, Data Aggregator And Meter Operator'

P63 (Reference 6) has been issued to the Authority for determination. Although P63 is not yet approved, readers of this Requirements Specification are requested to note that the obligation proposed on Parties will be to retain up to 48 months of data² after the Settlement Day in support of a failing Party Agent. The proposed data retention on Parties for P107 will also be up to 48 months. There will therefore be no impact on the proposed legal text for P63 on the basis that the data retention period remains at up to 48 months. The legal text for P63 is contained in the 'P63 Modification Report, Attachment 1 – Legal text to give effect to the Proposed Modification' (Reference 6).

Should the data retention obligations for P107 change from 48 months, and if P63 were approved by the Authority for implementation, there would be a consequential impact on the P63 legal text. The affected P63 legal text that is proposed for inclusion within Section S, paragraph 2.7.9 of the BSC is as follows:

"2.7.9 Each Supplier shall at all times hold the following data in relation to each SVA

Metering System for which it is responsible:

- (a) the Meter Technical Details;*
- (b) in the case of a Non Half Hourly Metering System, the Metered Data obtained for each relevant Settlement Register on each occasion during the preceding 48 months on which valid Metered Data was obtained, and the latest values of Estimated Annual Consumption and Annualised Advance."*

² 'up to 48 months of data' refers to those new Metering Systems that may not have accumulated sufficient historical information on the basis that they have been registered for less than the data retention period. A Supplier with these types of Metering Systems would be non-compliant should the 'up to' not be included in the legal text.

1.4.5 P103 'Respecification of Trading Data'

P103 seeks to extend the content and retention period for information currently provided by the Balancing Mechanism Reporting Agent (BMRA) on the Balancing Mechanism Reporting System (BMRS). In addition P103 seeks to provide additional tools to allow users of the BMRS to query the data using such tools as Microsoft® Access® so that the data is made available in a more user friendly manner and transparent manner. P103 also seeks to change the interface to the BMRS to ensure that data items displayed there are updated as a result of Settlement Runs. P103 is in the Assessment Procedure with the Assessment Report being presented to the Panel on 16 January 2003. The GSMG do not believe that there is any need in support of P107 to define data retention obligations on the BMRA.

1.5 Change Proposals

There are two Change Proposals which are currently on hold pending the outcome of P107, these are:

1.5.1 CP842 'Revision to Non-Half Historical Data Transfer Requirements'

CP842 was raised on behalf of the VASMG during the progression of P63. The rationale for progressing this Change Proposal was to require an old Non-Half Hourly Data Collector to provide sufficient historical data to enable the new Non-Half Hourly Data Collector to fulfil its obligations following a bulk change of Non-Half Hourly Data Collector. On the basis that P107 seeks to clarify the data retention requirements it is desirable that the data transfer requirements be consistent with P107. Consequently, this Requirements Specification proposes appropriate data transfer requirements.

1.5.2 CP873 'Changes to the Half Hourly Data Estimation Requirements within the Code Subsidiary Documents'

CP873 proposes a re-write of the half hourly data estimation rules within a number of Code Subsidiary Documents. One of the changes proposed is to refine how much data is transferred between Half Hourly Data Collectors following an appointment change. Hence, this Requirements Specification proposes appropriate data transfer requirements.

2 REQUIREMENTS SPECIFICATION FOR MODIFICATION PROPOSAL P107

2.1 Requirements Specification Overview

P107 requires amendment to the cut-off timescales by which Trading Disputes can be raised and adjusted after the Final Settlement Run. In addition, P107 proposes prescription of the data retention obligations.

Following implementation of P61 on 10 December 2002, the BSC provides an extremely protracted timetable for raising and resolving Trading Disputes. The cut-off point for raising Trading Disputes is set out in Section W 1.2.5 of the BSC, which states that:

“No Trading Query or Trading Dispute may be raised in respect of a Settlement Day after the third anniversary of such Settlement Day...”

thus allowing a whole twenty-two months after the Final Reconciliation for Parties to raise a Trading Dispute. The cut-off for resolving Disputes (following implementation of P61) is set out in Section U2.2.4 of the BSC, which states that:

“No Settlement Run or Volume Allocation Run shall be carried out on any date which is more than 36 months after the Settlement Day to which such runs relate, save only that (on the recommendation of the Trading Disputes Committee and with the approval of the Panel in accordance with Section W) an Post-Final Settlement Run and Post-Final Volume Allocation Runs may be carried out after that date, upon resolution after that date of a Trading Dispute which was raised not later than 36 months after the Settlement Day in question.”

thus allowing an unlimited period of time for resolving Trading Disputes.

No precise cut-off points are included within the BSC relating to data retention obligations other than for the BMRA, where at least 12 months of data is required to be retained. Paragraph 2.2.4 of Section V states that:

“Unless otherwise specified in this paragraph 2 or Table 1, all BMRS data will remain available on the BMRS (except that errors in such data may be corrected) until no earlier than the expiry of a period of 12 months after:

- (a) the Settlement Day to which such data relates, or*
- (b) in the case of forecast data, the day on which such data was provided.”*

The data retention obligations on Parties and others are implied by the Trading Query / Trading Dispute obligations.

P107 proposes that:

- The cut-off point for raising a Trading Dispute should be [20] months after the Settlement Day.
- The cut-off point for a Post-Final Settlement Run should be [28] months after the Settlement Day.
- The cut-off point for an Extra-Settlement Determination should be [28] months after the Settlement Day.
- The data retention obligations should be defined.

It is proposed that P107 be implemented on a Settlement rather than calendar day basis.

2.2 Raising Post-Final Settlement Run Trading Query / Trading Dispute

As stated above, the BSC states that a Party can raise a Post-Final Trading Dispute up to 36 months after the Settlement Day. In practice, Parties raise Post-Final Trading Disputes within a much shorter timescale.

P107 therefore proposes that the BSC is modified so that Parties will be able to raise a Post-Final Trading Dispute up to 20 months after the Settlement Day (this allows a Party six months after the Final Settlement Run to identify and raise a Trading Query / Trading Dispute with the TDC).

The GSMG have assessed P107 and believe that reducing the timescale by when a Party can raise a Post-Final Trading Dispute is desirable on the basis that a Party will in practice determine if there is a data error problem near or soon after the Final Settlement Run. Therefore the GSMG believe that reducing the timescale will bring the BSC closer to existing industry practice, and as such the impact of making the change is expected to be less than the impact of leaving the BSC unchanged. There may be an impact on systems / processes used by Parties, Party Agents and BSC Agents.

GSMG Requirement Summary: A Trading Query / Trading Dispute can be raised up to 20 months after the Settlement Day. Where a Trading Query / Trading Dispute is raised covering a number of Settlement Days, all days in the disputed period will satisfy the 20 month cut-off period.

2.3 Resolution of Post-Final Settlement Run Trading Disputes (Post-Final Settlement Run and Extra-Settlement Determination)

As stated in section 2.1, the BSC states that the resolution of a Post-Final Trading Dispute will in normal circumstances occur no more than 36 months after the Settlement Day. However the BSC does allow, for a Trading Dispute to be resolved (following the approval of the TDC) after the 36 months using the Post-Final Settlement Run and Post-Final Volume Allocation Runs mechanisms. The cut-off point for the correcting the Trading Dispute is currently indefinite.

Following implementation of P61 'Ad Hoc Adjustments to Settlement involving material errors without resorting to Ad Hoc Settlement Runs' on 10 December 2002 the mechanism for achieving Trading Error / Trading Query corrections after the Final Settlement Run will be via a Post-Final Settlement Run or an Extra-Settlement Determination. No amendment however has been made to the resolution period under P61. Therefore the cut-off point for correcting the Trading Dispute will continue to be indefinite.

P107 proposes that the BSC is modified so that Post-Final Settlement Run and Extra-Settlement Determinations will be undertaken by 28 months after the Settlement Day. This will give the TDC, (in conjunction with ELEXON, Parties and where affected BSC Agents) eight months to resolve the Trading Dispute.

The GSMG have assessed P107 and believe that this open ended cut-off point is undesirable because it places onerous obligations on the TDC, ELEXON, Parties and potentially the relevant BSC Agents as they will be required to support resolution of the Post-Final Trading Dispute indefinitely as well as retaining the relevant Settlement data. Following initial legal advice, the GSMG recognised that it may be undesirable to set a cut-off timescale on the basis that this may compromise the ability of the TDC to reach a valid determination and may also restrict the amount of time required to correct the Trading error. The GSMG however agreed that most Trading Disputes would be resolved within 28 months of the Settlement Day to which they relate and therefore those which would not be resolved within 28 months of the Settlement Day could be treated as 'special cases'.

The GSMG therefore concluded that it was desirable that for those Trading Disputes which were unlikely to be resolved within 28 months of the Settlement Day to which they relate, that ELEXON (via the TDC) would notify the industry accordingly. . This approach is similar to the notification that is provided by BSCCo to relevant parties relating to Past Notification Error claims (paragraph 6.3.1 of Section P of the BSC). The purpose of this notification is to enable a Party to determine whether or not they may potentially be impacted by a Trading Dispute.

GSMG Requirement Summary: ELEXON on behalf of the TDC to notify the industry of those Trading Queries / Trading Disputes which are unlikely to be resolved within 28 months of the Settlement Day to which they relate.

2.4 Data Retention

As stated in section 2.1, the BSC does not prescribe the amount, type and mechanism for data retention, other than for the BMRA who is required to retain data for a minimum of 12 months after the Settlement Day (paragraph 2.2.4 of Section V of the BSC).

Parties in particular may therefore be unclear as to how much data should be retained. Obligations to retain data by the BSC Agents on the other hand are documented in the relevant contracts as well as a number of Service Descriptions (and also User Requirement Specifications). In addition, obligations to retain data by the Supplier Agents are described within the relevant Party Agent Service Lines. Appendix 1 of P107 'Data Retention Requirements within Code Subsidiary Documents and other Configurable Items' (Reference 1) identifies the documents where the data retention obligations are identified and also the amount of data that is currently required to be retained.

The GSMG have considered what data retention obligations should be introduced in support of P107 and in determining the amount of data to be retained have considered a number of factors. The cut-off point for data retention should:

- not compromise the Settlement timetable;
- not compromise the ability of a Trading Party to raise a Trading Dispute after the Final Settlement Run (up to a reasonable cut-off point);
- not compromise the Past Notification Error correction process described within Section P, paragraph 6 of the BSC;

- not compromise the correction of any large Estimated Annual Consumption (EACs) / Annualised Advances (AAs);
- allow for different data retention obligations, dependent upon the market role type;
- accommodate existing industry practices;
- not compromise audit requirements; and
- not compromise the BSC financial obligations.

There may be an impact on systems / processes used by Parties, Party Agents and BSC Agents.

Amount of Data Retention

The subsequent sections of this Requirement Specification propose that the following two levels of data retention obligations will apply:

- data will be required to be held within the 'live operational environment' for a period of time; and
- subsequently the data will be required to be held using an appropriate archiving mechanism for a further period of time.

Resolution of Post-Final Settlement Run Disputes

Where a Trading Query / Trading Dispute relates to a number of Settlement Days, all days within the disputed period will need to satisfy the 20 month cut-off period.

In order for the TDC to be able to correct a Trading Dispute post the Final Settlement Run, a snapshot view as to what was settled at a particular Settlement Run will be required. Data that has been updated since the Settlement Run where the error occurred is of no use in resolving the Trading Query / Trading Dispute.

Relevant Settlement Data

Although ELEXON recommended that the type of data to be retained should be described in broad terms, the GSMG did not believe that this was necessary. The GSMG recognised that there was an implied obligation on the industry to retain the 'relevant Settlement data' that may be required to discharge various Settlement process obligations. These Settlement process obligations are documented in the BSC and Code Subsidiary Documents. However the specific requirement to retain 'relevant Settlement data' is not documented within the BSC. The GSMG agreed that an obligation to retain the 'relevant Settlement data' that may be required to discharge obligations outside the Settlement timetable in support of Trading Queries / Trading Disputes was necessary.

The consultation will seek the views of the industry as to whether or not the type of data to be retained should be prescribed as opposed to a generic definition of 'relevant Settlement data'. If the industry recommends that the type of data should be prescribed, changes maybe required to industry and BSC Systems and as a result there may be a consequential impact on the Certification documents and the Certification process itself. Should the consultation feedback indicate that the preferred approach is to define the types of data, the impact on the industry will be established during the DLIA which will be undertaken in January 2003.

GSMG Requirement Summary: Prefer the definition of 'relevant Settlement data' but seek the views of the industry as to whether the type of data to be retained should be defined.

2.4.1 Party Data Retention Obligations (Non-P6 Applicable)

Although Parties may not be directly impacted by the Past Notification Error claims process (Section P6 of the BSC), there will be an indirect impact on Parties via the Error Correction Payment Reallocation process which is applied to each Energy Account for each Trading Party (as outlined in paragraph 6.5.5 of Section P of the BSC). Therefore as a minimum, the requirements below will apply to Parties.

Parties that are directly affected by the Past Notification Error claims process will additionally be required to be compliant with section 2.5. Parties involved in the EAC/AA correction process will also be required to comply with section 2.6.

Data Retention Amount

Parties can potentially be involved in the Trading Dispute process and as such should retain sufficient Settlement data to enable Trading Disputes to be resolved. Parties who are not subject to the Past Notification Error process, will therefore be required to retain Settlement related data for 48 months after the Settlement Day.

Data Retention Mechanism

Each Party will ensure that the Settlement data will be retained for 28 months after the Settlement Day in the 'live operational environment'. Thereafter, the Party will keep this Settlement Data for a further 20 months (either using the 'live operational environment' or an archiving mechanism) in a format which is easily retrievable and can be used, if required by the TDC, in the resolution of a Post-Final Settlement Run Trading Dispute.

Where an archiving mechanism is to be employed, the frequency of such archiving (eg. daily, weekly, monthly) will be established during the consultation.

2.4.2 Party Agent Data Retention Obligations (Non-P6 Applicable)

There are three types of Party Agent:

- Supplier Agents (half hourly and non-half hourly Meter Operators, Data Collectors and Data Aggregators);
- Supplier Meter Registration Agents (SMRAs); and
- Notification Agents (Energy Contract Volume Notification Agents (ECVNAs) and Metered Volume Notification Reallocation Agents (MVRNAs)).

Data Retention Amount

Each of the above Party Agents will be required to retain Settlement related data for 48 months after the Settlement Day. Party Agents that are subject to the Past Notification Error process will also be required to be compliant with section 2.5. Party Agents involved in the EAC/AA correction process will also be required to comply with section 2.6.

Data Retention Mechanism

Each Party Agent will ensure that the Settlement data will be retained for 28 months after the Settlement Day in the 'live operational environment'. Thereafter, the Party Agent will keep this Settlement Data for a further 20 months (either using the 'live operational environment' or an archiving mechanism) in a format which is easily retrievable and can be used, if required by the TDC, in the resolution of a Post-Final Settlement Run Trading Dispute.

Where an archiving mechanism is to be employed, the frequency of such archiving (eg. daily, weekly, monthly) will be established during the consultation.

Data Transfer Requirements

There is an existing obligation (as outlined in the relevant BSC Procedures (BSCPs) and Service Lines)) that relevant Party Agents, specifically Meter Operator Agents and Data Collectors provide historical data to the incoming Party Agent following de-appointment. Therefore to ensure that the incoming Party Agent can perform its duties adequately, the following data transfer requirements will apply:

(a) Change of Meter Operator Agent

All the Meter Technical Details (as defined in Annex X-1 of the Code) available from the 'live operational environment' (ie. 28 months after the Settlement Day) to be provided to the incoming Meter Operator Agent. Where historic Meter Technical Details is not available electronically, paper copies should be transferred.

(b) Change of Data Collector

All the Metered Data (valid / invalid) and for Non-Half Hourly Metering Systems additionally the valid EAC/AA data from the 'live operational environment' (ie. 28 months after the Settlement Day) to be provided to the incoming Data Collector.

(c) Change of Data Aggregator

No BSC requirement.

2.4.3 BSC Agent Data Retention Obligations (Non-P6 Applicable)

There are currently the following twelve BSC Agents:

- (a) Balancing Mechanism Reporting Agent (BMRA)
- (b) BSC Auditor
- (c) Central Data Collection Agent (CDCA)
- (d) Central Registration Agent (CRA)
- (e) Certification Agent
- (f) Energy Contract Volume Aggregation Agent (ECVAA)
- (g) Funds Administration Agent (FAA)
- (h) Profile Administrator
- (i) Settlement Administration Agent (SAA)

- (j) Supplier Volume Allocation Agent (SVAA)
- (k) Technical Assurance Agent (TAA)
- (l) Teleswitch Agent

Below are the specific requirements on each of the BSC Agents. BSC Agents that are subject to the Past Notification Error process will also be required to be compliant with section 2.5.

Where an archiving mechanism is to be employed, the frequency of such archiving (eg. daily, weekly, monthly) will be established during the consultation.

(a) Balancing Mechanism Reporting Agent

There is no proposal to amend the BMRA data retention obligations included within Section V of the BSC on the basis that this is a reporting tool and the data provided by it is not used for Settlement calculations.

P103 seeks to extend the content and retention period for information currently provided by the BMRA on the Balancing Mechanism Reporting System (BMRS). The SSMG, which is responsible for progressing P103, is currently reviewing the data retention periods (including the data retention mechanisms). The P103 Requirements Specification (Reference 4) outlines the proposed amendments to the BMRA service. The SSMG provisional view obtained on 10 December 2002 is that P103 does not better facilitate the relevant BSC Objective.

Data Retention Amount

No revision proposed to the existing BSC obligations (paragraph 2.2.4 of Section V of the BSC).

Data Retention Mechanism

No revision proposed to existing BSC obligations (paragraph 2.2.4 of Section V of the BSC).

(b) BSC Auditor

The BSC Auditor undertakes the auditing requirements on behalf of BSSCo. On the basis that the BSC Auditor role is an ad-hoc service (which is triggered from the relevant BSC Procedure (BSCP) and because ELEXON manages the results of the BSC Audit, it is not necessary that specific data retention obligations are placed upon the BSC Auditor.

Data Retention Amount

No BSC requirement.

Data Retention Mechanism

No BSC requirement.

(c) Central Data Collection Agent (CDCA)

The CDCA collects and processes Metered Data from Central Volume Allocation (CVA) registered Metering Systems. This role is similar to that performed by the Half Hourly Data Collectors (HHDCs) in the SVA market.

Data Retention Amount

The CDCA will be required to retain Settlement related data for 48 months after the Settlement Day.

Data Retention Mechanism

The CDCA will ensure that the Settlement data will be retained for 28 months after the Settlement Day in the 'live operational environment'. Thereafter, the CDCA will archive this Settlement data for a further 20 months in a format which is easily retrievable and can be used, if required by the TDC, in the resolution of a Post-Final Settlement Run Trading Dispute.

(d) Central Registration Agent (CRA)

The CRA registers all CVA Metering Systems. This role is similar to that performed by the SMRS in the SVA market.

Data Retention Amount

The CRA will be required to retain Settlement related data for 48 months after the Settlement Day.

Data Retention Mechanism

The CRA will ensure that the Settlement data will be retained for 28 months after the Settlement Day in the 'live operational environment'. Thereafter, the CRA will archive this Settlement data for a further 20 months in a format which is easily retrievable and can be used, if required by the TDC, in the resolution of a Post-Final Settlement Run Trading Dispute.

(e) Certification Agent

The Certification Agent undertakes the Certification of Party Agents. On the basis that the Certification Agent role is an ad-hoc service (which is triggered for example when a Party Agent joins the BSC arrangements or changes role type) and because ELEXON manages the results of the Certification process, it is not necessary that specific data retention obligations are placed upon the Certification Agent.

Data Retention Amount

No BSC requirement.

Data Retention Mechanism

No BSC requirement.

(f) Energy Contract Volume Aggregation Agent (ECVAA) (Non-P6 Applicable)

The ECVAA receives and processes Volume Notifications submitted by the Notification Agents (ECVNAs and MVRNAs) and determines the positions of Parties for onward submission to the SAA. The ECVAA will also be required to be compliant with section 2.5 for the period affected by Past Notification Error claims.

Data Retention Amount

The ECVAA will be required to retain Settlement related data for 48 months after the Settlement Day.

Data Retention Mechanism

The ECVAA will ensure that the Settlement data will be retained for 28 months after the Settlement Day in the 'live operational environment'. Thereafter, the ECVAA will archive this Settlement data for a further 20 months in a format which is easily retrievable and can be used, if required by the TDC, in the resolution of a Post-Final Settlement Run Trading Dispute.

(g) Funds Administration Agent (FAA)

The FAA is the BSC Agent that administers the clearing, invoicing and payment activities for Parties on behalf of the BSC. This information is dependent on the output from the SAA. This requirement is equal to that required of the SAA. In addition, the FAA will be required to meet the Past Notification Error requirements described in section 2.5. Where the FAA is involved in the EAC/AA correction process there will also be the requirement to comply with section 2.6.

Data Retention Amount

On the basis that the FAA is involved in the financial reporting and collection of funds, the FAA will be required to retain Settlement related data for 48 months after the Settlement Day.

Data Retention Mechanism

The FAA will ensure that the Settlement data will be retained for 28 months after the Settlement Day in the 'live operational environment'. Thereafter, the FAA will archive this Settlement data for a further 20 months in a format which is easily retrievable and can be used, if required by the TDC, in the resolution of a Post-Final Settlement Run Trading Dispute.

(h) Profile Administrator

The Profile Administrator provides load research data for use in the Supplier Volume Allocation processes. On the basis that the Profile Administrator role is to provide profile research data for consideration by the industry and because the Supplier Volume Allocation Group (SVG) determine whether or not changes in the profiling regime should be utilised in Settlement, and thereby publishes this information to the industry (using the change control mechanism outlined in BSCP40 'Change Management' (reference 5)), it is not necessary that specific data retention obligations are placed upon the Profile Administrator.

Data Retention Amount

No BSC requirement.

Data Retention Mechanism

No BSC requirement.

(i) Settlement Administration Agent (SAA)

The SAA is the BSC Agent that calculates the financial liabilities of Parties on behalf of the BSC.

Data Retention Amount

On the basis that the SAA is also involved in the financial calculations of the BSC, the SAA will retain Settlement data for 48 months after the Settlement Day. This requirement is equal to that required of the FAA. In addition, the SAA will be required to meet the Past Notification Error requirements

described in section 2.5. Where the SAA is involved in the EAC/AA correction process there will also be the requirement to comply with section 2.6.

Data Retention Mechanism

The SAA will ensure that the Settlement data will be retained for 28 months after the Settlement Day in the 'live operational environment'. Thereafter, the SAA will archive this Settlement data for a further 20 months in a format which is easily retrievable and can be used, if required by the TDC, in the resolution of a Post-Final Settlement Run Trading Dispute.

(j) Supplier Volume Allocation Agents (SVAA)

The SVAA is the BSC Agent that calculates the Supplier take for all Metering Systems registered in the SMRS. The SVAA however does not calculate the financial liability of Parties.

Data Retention Amount

The SVAA will be required to retain Settlement related data for 48 months after the Settlement Day. Where the SVAA is involved in the EAC/AA correction process there will also be the requirement to comply with section 2.6.

Data Retention Mechanism

The SVAA will ensure that the Settlement data will be retained for 28 months after the Settlement Day in the 'live operational environment'. Thereafter, the SVAA will archive this Settlement data for a further 20 months in a format which is easily retrievable and can be used, if required by the TDC, in the resolution of a Post-Final Settlement Run Trading Dispute.

(k) Technical Assurance Agent (TAA)

The TAA administers the Technical Assurance obligations of the BSC. On the basis that ELEXON manages the results of the TAA visits, it is not necessary that specific data retention obligations are placed upon the TAA.

Data Retention Amount

No BSC requirement.

Data Retention Mechanism

No BSC requirement.

(l) Teleswitch Agent

The Teleswitch Agent provides teleswitch messages (ie. the teleswitch contact interval data) to the SVAA. On the basis that the SVAA receives and utilises the teleswitch messages (via the D0277 'Teleswitch Contact Interval Data File') during the Daily Profile Production Runs and maintains this data. There is no separate requirement for the Teleswitch Agent to retain data.

Data to be Retained

No BSC requirement.

Data Retention Mechanism

No BSC requirement.

2.5 P6 'Past Notification Error' Data Retention Obligations

Those Parties, Party Agents (ECVNAs and / or MVRNAs) using the Volume Notification process and the ECVAAs may be impacted by the Past Notification Error claims process provided for in paragraph 6 of Section P of the BSC. Therefore different data retention obligations will apply for those that have submitted / or are affected by Past Notification Error claims.

These claims affect Settlement Days in the period from NETA go-live until approximately the end of May 2002. The Past Notification Error process requires that claims can be investigated, assessed and determined, appealed, and, as appropriate, rectified.

Data to be Retained by Parties

Parties have already submitted their Past Notification Error related claim information to ELEXON (as required by paragraph 6.2 of Section P of the BSC). At this stage ELEXON, on behalf of the Past Notification Error Committee, are investigating the Past Notification Error claims (as required by paragraph 6.4.4 (b) (i) of Section P of the BSC). In doing this, it may be necessary for further 'information as BSCCo may reasonably request' to be requested from Parties. Therefore Parties will need to be compliant with paragraph 6.4.4 (b) (i) of Section P of the BSC until such time as a Past Notification Error claim is determined, corrected and the appeal process, if initiated has been completed.

Data to be Retained by BSC Agents

BSC Agents must retain all relevant Settlement data necessary to execute each of these aspects of the Past Notification Error process. In particular:

- ECVAAs must retain all data relating to Volume Notifications which are the subject of claims;
- ECVAAs must retain all data necessary to validate proposed adjustments to Volume Notifications;
- ECVAAs must retain all data necessary to accept and process corrected Volume Notifications;
- SAAs must retain all data relevant to the Settlement Days affected by claims;
- SAAs must retain all data necessary to accept corrected Volume Notification data and re-run Settlement for the affected Settlement Days;
- SAAs must retain all data necessary to calculate the Error Correction Payment (ECP) defined by the Past Notification Error process, and to calculate how this should be redistributed to Parties;
- FAAs must retain all data necessary to apply and collect revised Settlement charges resulting from Past Notification Error process rectifications and ECP calculations.
- BSC Agents must retain all operational data relating to the periods including claims, including, for instance, help desk call logs, records of reports distributed, and records of any problems encountered; and
- The BMRA may be required to retain any data that was made available to the industry during the claim period.

Data Retention Mechanism

Any data potentially associated with a Past Notification Error should be retained in a format which is easily retrievable for presentation to ELEXON, on behalf of BSCCo.

2.6 Correction of Large Estimated Annual Consumption / Annualised Advances

Any Parties, Party Agents or BSC Agents affected by the resolution of the large EAC/AA issue will be required to retain Settlement data for 28 months after the Settlement Day in the 'live operational environment'.

2.7 Amendments Required for P107

This section defines amendments that will be required to the BSC, BSC Systems, Code Subsidiary Documents and other configurable items that are maintained by ELEXON.

2.7.1 Amendments to the BSC

The following amendments will be required to the BSC:

BSC Section	Proposed Amendment
Section P	Paragraph 6 to be amended so that Past Notification Error process timescales are not compromised by P107.
Section W	Paragraph 1.2.5 to be amended so that no Trading Query or Trading Dispute can be raised more than 20 months after the Settlement Day.
To be determined	Data Retention obligations

2.7.2 Amendments to the BSC Systems

It is not envisaged that changes will be required to BSC Systems. This will be confirmed during the DLIA.

2.7.3 Amendments to Code Subsidiary Documents

Amendments will be required to a number of Code Subsidiary Documents, these being:

Code Subsidiary Document	Proposed Amendment
BSCP01 'Overview of Trading Arrangements'	<ol style="list-style-type: none"> 1. Section 1 to specify that Post-Final Reconciliation Runs and Extra Determinations do exist 2. Section 1 to specify that data retention obligations exist
BSCP11 'Volume Allocation and Settlement Run Queries	<ol style="list-style-type: none"> 1. Amend the timescale by when a Trading Query / Trading Dispute can be raised 2. Amend the timescale by when a Post-Final Reconciliation Run / Extra Settlement Determination will be completed

Code Subsidiary Document	Proposed Amendment
BSCP508 'Supplier Volume Allocation Agent'	3.4 'Annual Profile Data': The timescale currently allows for annual profile data to be requested from SVAA 'At any time'. Following implementation of P107, this data will only be available up to the data retention capacity. The timescale references in this process will need modification to restrict a Party's ability to indefinitely request this data
PSL110 'SVA Meter Operation'	Clarification of: 1. the data retention mechanism ie. on-line for 28 months and archived for 20 months 2. the type of data to be retained
PSL120 'Non-Half Hourly Data Collection'	Clarification of: 1. the data retention mechanism ie. on-line for 28 months and archived for 20 months 2. the type of data to be retained
PSL130 'Half Hourly Data Collection'	Clarification of: 1. the data retention mechanism ie. on-line for 28 months and archived for 20 months 2. the type of data to be retained
PSL140 'Non-Half Hourly Data Aggregation'	Clarification of: 1. the data retention mechanism ie. on-line for 28 months and archived for 20 months 2. the type of data to be retained
PSL150 'Half Hourly Data Aggregation'	Clarification of: 1. the data retention mechanism ie. on-line for 28 months and archived for 20 months 2. the type of data to be retained
PSL160 'Supplier Meter Registration Agent'	Clarification of: 1. the data retention mechanism ie. on-line for 28 months and archived for 20 months 2. the type of data to be retained
PSL170 'Meter Administration'	Clarification of: 1. the data retention mechanism ie. on-line for 28 months and archived for 20 months 2. the type of data to be retained
PSL180 'CVA Meter Operation'	Clarification of: 1. the data retention mechanism ie. on-line for 28 months and archived for 20 months 2. the type of data to be retained
SSL320 'Disaster Recovery Service'	Cross-refer to SSL370 for the data retention obligations
SSL330 'National Support Services'	Cross-refer to SSL370 for the data retention obligations
SSL370 'Miscellaneous Services'	Clarification of: 1. the data retention mechanism ie. on-line for 28 months and archived for 20 months 2. the type of data to be retained
BMRA Service Description	Embodiment of the current BSC obligations (paragraph 2.2.4 of Section V) into the Service Description. Note: P103 may seek to revise the BSC obligations
CRA Service Description	Inclusion of: 1. the data retention mechanism ie. on-line for 28 months and archived for 20 months 2. the type of data to be retained

Code Subsidiary Document	Proposed Amendment
FAA Service Description	<ol style="list-style-type: none"> 1. inclusion of the data retention mechanism ie. on-line for 28 months and archived for 20 months (48 months in total) 2. inclusion of the type of data to be retained 3. ensure that the Past Notification Error process data retention requirements are not compromised by the P107 data retention requirements
CDCA Service Description	Inclusion of: <ol style="list-style-type: none"> 1. the data retention mechanism ie. on-line for 28 months and archived for 20 months 2. the type of data to be retained
ECVAA Service Description	<ol style="list-style-type: none"> 1. inclusion of the data retention mechanism ie. on-line for 28 months and archived for 20 months 2. inclusion of the type of data to be retained 3. ensure that the Past Notification Error process data retention requirements are not compromised by the P107 data retention requirements
SAA Service Description	<ol style="list-style-type: none"> 1. inclusion of the data retention mechanism ie. on-line for 28 months and archived for 20 months (48 months in total) 2. inclusion of the type of data to be retained 3. ensure that the Past Notification Error process data retention requirements are not compromised by the P107 data retention requirements

2.7.4 Amendments to Other Configurable Items

Amendments will be required to a number of other configurable items, these being:

Configurable Item	Proposed Amendment
BMRA User Requirement Specification	Consistency changes with Service Description changes
CDCA User Requirement Specification	Consistency changes with Service Description changes
EAC/AA User Requirement Specification	Consistency changes with Service Description changes
FAA User Requirement Specification	Consistency changes with Service Description changes
NHHDA User Requirement Specification	Consistency changes with Service Description changes
SVAA User Requirement Specification	Consistency changes with Service Description changes

2.7.5 Impacts on ELEXON

ELEXON is already involved in the Trading Disputes process and also retains certain data received from a number of BSC Agents. These responsibilities will continue to apply should P107 be implemented. In particular ELEXON will retain the results of:

- Certification including the Self-Assessment Certification Returns (SACR)³ and any other documentation that are provided by the Certification Agent;
- Technical Assurance Visits;

³ P99 'Changes to Accreditation and the PARMS Serials and Standards, resulting from the Performance Assurance Framework (PAF) Review (Phase 1)' proposes replacing the SACR with a Certification Check List. P99 was recommended by the Panel on 12 December 2002 for approval.

- Entry Processes; and
- Teleswitch Agent, BSC Audit and Profile Administrator recommendations.

In addition, ELEXON will continue to support the resolution of the large EAC / AA corrections process which will continue for the foreseeable future.

2.8 Potential Changes to Systems (Party, Party Agent and BSC Agent Systems)

There may be an impact on Party systems and processes as a result of the requirements outlined in section 2.4.1 and 2.5.

There may be an impact on Party Agent systems and processes as a result of the requirements outlined in section 2.4.2 and 2.5.

There may be an impact on BSC Agent systems and processes as a result of the requirements outlined in section 2.4.3 and 2.5.

The DLIA undertaken by Parties, Party Agents and the BSC Agents in January 2003 will confirm what impacts, if any, including any lead timescales that would be required to develop and implement the necessary system changes (including appropriate archiving mechanisms) for P107. The DLIA responses will be considered by the GSMG prior to determining an appropriate Implementation Date for recommendation to the Panel.

The GSMG believe that the proposed solution for P107 aligns the BSC with industry practice and therefore the impact on the industry will be minimal. This will be confirmed via the DLIA (which will follow the consultation).

2.9 Potential Changes to Core Industry Documentation

The following lists the documentation (other than the documentation specific to the BSC) that requires amendment as a result of the implementation of P107 together with a brief summary of the potential change. The documentation listed is believed to represent the full set of impacted documents at this time.

Core Industry Document	Proposed Amendment
Master Registration Agreement	The MRA requires that 28 months of data is retained. P107 proposes that 48 months of data in total is retained (28 months on-line and 20 months archived). A change to the MRA will therefore be required to include equivalent requirements to those proposed for inclusion in BSCP501 and PSL160. The joint change control process will be initiated following approval of P107.

2.10 Exclusions

The following section outlines those areas that are not considered to be within the scope of P107:

- Any statutory obligations relating to data retention that may apply to Parties, Party Agents and BSC Agents.
- Any process changes that may be required by Parties and Party Agents.

- Any system changes that may be required by Parties and Party Agents (excluding the EAC/AA and the NHHDA software).
- There is no proposal to specify data retention obligations on the Entry Process Co-ordinator (EPC)⁴ on the basis that that the EPC role is an ad-hoc service (which is triggered for example when a Party Agent joins the BSC arrangements or changes role type) and because ELEXON manages and receives the results of the Entry Process, it is not necessary that specific data retention obligations are placed upon the EPC.
- As stated earlier in this document P78 was approved by the Authority on 9 September 2002 (Reference 7) with an Implementation Date of 25 February 2003. P78 introduces the concept of Market Data Index Providers, who are not BSC Agents. These agents will be appointed by ELEXON by contractual means. These agents will be required, amongst other things, to retain data. As contractual arrangements are nearly in place, it is not proposed to amend the data retention obligations of these agents any further at this stage. Revisions to the agent contracts may need to occur following approval of P107 and would be achieved using the contract change control process, initiated by ELEXON. This activity is outside the scope of this Requirements Specification. In addition, the Market Data Index Providers may be involved in the Trading Query / Trading Dispute process should the calculations not be performed as required in the contract. No further obligations are required on the Market Data Index Providers at this time.
- On the basis of the timetable recommended for P107, the progress of P107 through the Modification Procedure and on to the Authority will not be completed until April 2003 at the earliest, in order to avoid non-compliance with the BSC, Parties will need to negotiate an extension to the data retention requirements with their Agents prior to 27 July 2003 (i.e. twenty-eight months after NETA Go-Live date).
- On the basis that the P107 Modification Report will not be presented to the Authority until April 2003 (based on currently planning estimates) at the earliest, ELEXON will negotiate any additional data retention requirements with the affected BSC Agents, pending a determination on P107. This activity is outside the scope of this Requirements Specification.

⁴ The EPC is not a BSC Agent and is appointed by ELEXON by contractual means.

3 DEVELOPMENT PROCESS

For the purposes of this assessment, BSC Agents (ie. Logica Consortium, EPFAL Limited and Cap, Gemini, Ernst & Young) should assume that the changes will be implemented as a standalone development project managed by ELEXON.

Notwithstanding, ELEXON recognise that responsibility for design, testing and implementation of the BSC Systems lies with the BSC Agents, and in order to gain assurance that changes made are consistent with the requirements, ELEXON requires visibility of these processes. The following sections give an indication of the control points required during design, testing and implementation and are supplied to provide a basis on which the BSC Agent can estimate.

3.1 Design

ELEXON intend that responsibility for the correctness of the design should remain with the BSC Agents, but that ELEXON should have the opportunity to review it, and identify apparent inconsistencies with the requirements. The following processes are proposed to achieve this:

- ELEXON will review changes to the User Requirement Specifications (URS), and sign-off the document once review comments have been addressed.
- ELEXON will review changes to the System Specification and Design Specification, and identify any evident inconsistencies with the URS, but will not sign-off the documents.

3.2 Testing

ELEXON intend that responsibility for software testing should remain with the BSC Agents, but that ELEXON should have some visibility of the process, in order to gain assurance that the integrity of Trading and Settlement is maintained. The following processes are proposed to achieve this:

- As part of the response to this document, the BSC Agents will provide a statement of their proposed testing strategy. This statement will be reviewed by ELEXON, and should explain how the BSC Agents will demonstrate that the changes are ready for live operation, and that there is no unplanned impact on pre-existing facilities.
- ELEXON will be provided for information with test plans, test scripts and other test documentation that they may request. ELEXON will review these documents, and identify any evident inconsistencies with the agreed testing strategy, but will not authorise them.
- ELEXON will have the option of witnessing appropriate elements of the BSC Agent's testing.
- The BSC Agent will provide ELEXON with a test report, summarising the testing carried out, and the results of those tests. The report will also describe any defects found during testing, and the steps taken to resolve them.

3.3 Implementation

ELEXON anticipate the following interaction with the BSC Agent's implementation process:

- As part of the impact assessment of this document, the BSC Agents will provide a high-level statement of their proposed implementation approach (describing, for example, whether a phased approach is proposed). ELEXON will review and sign-off this high-level implementation strategy.

- Implementation date(s) for the changes described in this document will be agreed in advance by ELEXON and the Agents.