

<b>Change Proposal – F40/01</b>	<b>CP No: 974</b>  <b>Version No: 2</b>
<b>Title</b> <i>(mandatory by originator)</i> Full review of BSCP65	
<b>Description of Problem/Issue</b> <i>(mandatory by originator)</i>  A full review of BSCP65 needs to be carried out to ensure that the processes are clarified and are brought in line with Section A of the Code. Inconsistencies have been identified as part of the BSC review (in particular with regard to Withdrawal from Acceded Status).	
<b>Proposed Solution(s)</b> <i>(mandatory by originator)</i>  It is proposed that the following in particular are reviewed and the relevant processes clarified: <ul style="list-style-type: none"> <li>• Section A of the BSC refers to the following Participation capacities: <ul style="list-style-type: none"> <li>- Transmission Company</li> <li>- Distribution System Operator</li> <li>- Trading Party</li> <li>- Interconnector Error Administrator</li> <li>- Interconnector Administrator</li> <li>- Supplier</li> </ul> </li> </ul> <p>BSCP65/4.1 reflects these capacities. However, 'Trading Party' is an umbrella term which encapsulates the roles of Generator, Interconnector User and Non-Physical Trader (and Supplier). Participants are required to specify which particular role they wish to register in on Central Systems, and they are subjected to the Qualification requirements relevant to the role in which the Party wishes to register.</p> <p>It is suggested that reference is made to the roles encapsulated under the 'Trading Party' umbrella term on the BSCP65/4.1 form, as per the Accession and Registration Route Map depicted in Fig. 1 within BSCP65. Thus, in accordance with this suggestion, the BSCP65/4.1 would include the following options within the Participation Capacities table:</p> <p>Trading Party – Generator  Trading Party – Interconnector User  Trading Party – Non-Physical Trader</p> <ul style="list-style-type: none"> <li>• Within the Participation Categories box, 'Supplier' appears as a separate option, giving the false impression that a Supplier is not a Trading Party. In line with the suggestion above, it is proposed that the option Trading Party – Supplier is included in the Participation Capacities table on the BSCP65/4.1 form.</li> </ul>	

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- The interface and interdependencies with the **FAA** need to be reviewed and clarified (CP 720 – this should now be reviewed as part of this CP).

Please note the following points:

- a. Section 1.2 incorrectly states that the FAA is a user of BSCP65 in respect of interface tests. This incorrect statement should be removed and clearer references should be made in Section 3.1 of the Interface Timetable to the BSC Agents involved in the interface tests.
- b. Section 3.1.4 of the Interface Timetable states that the Party Applicant must complete and submit a FAA Registration Form using BSCP301 at least 10 working days before the applicant becomes a Trading Party.

BSC Section A4 which deals with Party registration does not make any reference to such a dependency. Whether or not such a dependency should exist needs to be explored.

If it is deemed that such a dependency should be included in BSCP65:

- An additional step should be inserted requiring the FAA to check with BSCCo that the Applicant has acceded to the BSC
  - Whether the BSCCo requires confirmation from the FAA that the required form and details have been provided, before instructing the CRA to set the effective from date for the Trading Party role on Central Systems, also needs to be clarified
  - Replace all references to FAA Registration Form with Funds Accession Form (BSCP301/04a)
- Relevant **dataflow** references are not consistently defined throughout the BSCP.

The applicable dataflows should be referenced in the 'Input Information Required' column throughout the BSCP.

- Section 3.1 does not at present make any reference to the **Communication Line Acquisition** process which is required to undertake Interface testing.

There should be some reference to the Communication Line Acquisition process for those Party Applicants who will be undertaking Interface Testing.

- Section 3.1.7 states that BSCCo should advise the Party Applicant of the Interface Tests Required. There is no reference in this section to the option of submitting an Application for a Waiver of Qualification testing.

It is proposed that Section 3.17 should state that BSCCo should advise the Party Applicant of the Qualification Requirements (this would then encapsulate Qualification Testing and Waivers).

- Section 3.1.7 which refers to the **registration of a Supplier** role does not adequately define the requirement that **registration via BSCP65 is done in parallel with registration in MDD and the updating of the registration of the Base BM Units**.

The required parallel activities need to be clarified and defined in the BSCP. The applicable timescales for Supplier registrations also need to be detailed. This should include the requirement that the Supplier's registration details need to be on Central Systems 2 weeks before the effective to date of the

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Supplier role which will be the same as the applicable MDD Go live date.

- Section 3.1.7 which refers to the **registration of an LDSO role** does not adequately define the requirement that **registration via BSCP65 is done in parallel with registration in MDD**.
- The required parallel activities need to be clarified and defined in the BSCP. The applicable timescales for LDSO registrations also need to be detailed.
- 3.1.9 refers to the Testing Counterparty sending the **Interface Testing Completion form (BSCP65/4.2)** to BSCCo following the completion of the Interface testing. This form is redundant. The Testing Counterparty currently sends BSCCo a spreadsheet detailing the flows tested and the results of the testing.

The BSCP65/4.2 form and references to it should be removed. 3.1.9 should say that the Testing Counterparty sends the BSCCo the test results in the 'Actions' column and should reference the Qualification Report spreadsheet in the 'Input information required' column.

- 3.1.10 The resulting action of determining the Party Applicant has successfully completed the interface tests or has been granted a Waiver, should be the BSCCo issuing a **Qualification statement** to the Applicant (copied to the CRA) which confirms the completion of the Qualification requirement.

A reference to the issuing of the Qualification Statement should be added in the 'Actions' and 'Input Information Required' columns.

- Section 3.2 which refers to **Changes to Party Registration Data** is particularly confusing as it covers a number of different scenarios – namely changes to participation capacities, changes to Party registration data and holding/closing energy accounts.

In accordance with the wording under BSC Section A4.4.1.(C), rather than referring to holding/closing energy accounts, the reference should be to a Party wishing to become a Trading Party or wishing to cease to be a Trading Party.

The scenarios within Section 3.2 should be separated and the relevant processes scoped out.

- The process for adding a role of Supplier or LDSO, should reflect the process defined for registering the roles under initial registration and vice versa eg under 3.2.8 a reference is included for the Party to update MDD in accordance with BSCP509 by submitting the relevant forms to MDDM (term which is not defined in the BSCP). This step is not included under 3.1 although it could apply equally to an Applicant registering in the role of Supplier in the first instance.

The key processes defined for registering roles initially or following a previous registration, should mirror each other.

- Section 3.2.1 should refer to BSCP65/4.1 in the 'Input Information Required' column as opposed to F65/01.
- Section 3.2 deals with the deregistration of Trading Parties. Under BSC Section A1.3.1 (c), a Trading Party is defined as 'a Party, other than the Transmission Company, which holds Energy Accounts...'. BSC Section A4.4.3 (a) goes on to define the circumstances in which a Party may cease to be a Trading Party. This clause does not refer to any dependency that a Party may not cease to be a Trading Party if

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the Final Reconciliation Run for the last Settlement day on which the Party traded has not been completed. Indeed, Section A4.4.1 (b) states 'where a Party ceases to be a Trading Party, it shall remain liable for any obligations and entitled to any benefits accrued or accruing to it as a Trading Party ... in respect of any Settlement Period ...prior to the date referred to in paragraph (a) (including in respect of Reconciliation Charges)...'.

The note in the 'Actions' column of Section 3.2.12 of BSCP65 states that where a Party wishes to cease being a Trading Party, all invoices associated with the Final Reconciliation for the relevant Settlement date need to be settled before Energy Accounts can be closed.

The following points need to be clarified:

- Can Parties set an effective to date for Trading Party roles on Central Systems where prior to all invoices associated with the Final Reconciliation for the relevant Settlement date being settled and their Energy Accounts being 'closed' (NB Central Systems is not configured in such a way as to allow accounts to be closed)
  - In this case, will Parties still be treated as Trading Parties (pursuant to A4.4.1(b)) from a Code perspective even though they are not registered on Central Systems as a Trading Party
  - Is the note in Section 3.2.12 correct? It is unclear in any case if it was intended as a note for Suppliers only.
- 3.2.12, in which CRA informs BSCCo whether the relevant deregistrations and terminations, should be followed by a step where **BSCCo authorises the CRA** to set the effective to date for the Trading Party role and the CRA then sets the effective to date for the role.
  - Section 3.3 which refers to the **Withdrawals process** needs to be reviewed in light of Section A5 of the Code and rewritten and the process scoped out considerably.

Please note the following points:

- 3.3.1 of BSCP65 states that a Withdrawals notice form (BSCP65/03 as opposed to BSCP65/4.3 as stated in the 'Input Information Required' column) cannot be submitted until the deregistrations/terminations and the closure of the energy accounts referred to in section 3.2 has been completed. This is not consistent with BSC Section A5 which defines no such dependency.

Section 3.3.1 of BSCP65 should be amended to reflect the fact that in accordance with BSC Section A5, **Parties can submit a Withdrawal notice at any time** with their choice of a Withdrawal date specified (providing it is 'not less than 28 days after the date of the Withdrawals notice'). If any of the criteria under Section A.5.1.3 are not met when the checks are carried out by BSCCo 2 business days prior to the Withdrawal date, the Notice given 'shall be of no effect'.

The **BSCP65/03 Withdrawals Notice form** should also be amended as, in its current format, Parties are led to believe they have to be able to answer 'no' to all of the questions, before they can submit the notice.

- Where the Notice has been checked, verified and accepted by BSCCo, there should be a step included whereby **BSCCo informs the Party in writing of their proposed withdrawal date and possible continuing liabilities under BSC Section A5.3.3 beyond their Withdrawal.**

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- The 'When' column in Section 3.3 of BSCP65 needs to be reviewed and clearly defined.
- With regard to Section 3.3.3, BSCCo would not be in a position to **verify the Party's Withdrawal date** until the checks under BSC Section A5.1.3 are completed and satisfied 2 business days prior to the proposed Withdrawal date.

The step whereby the **BSCCo undertakes the checks** 2 business days prior to the Withdrawal date should be added to the process specified under Section 3.3.

- With regard to Section 3.3.4, the BSCCo would only be in a position to **notify the industry** following the completion of the checks under BSC Section A5.1.3, providing those checks are satisfied.
- BSC Section A5.3.5 states that the following **groups** should be **notified in the event of a Withdrawal or Expulsion**:
  - a) each other Party
  - b) each Panel Member
  - c) the Authority; and
  - d) each BSC Agent

Steps 3.3.4 and 3.4.8 in BSCP65 need to be updated to bring them in line with BSC Section A5.3.5.

- The **BSCP65/4.1 form** should:

- Be set out in such a way that it is absolutely clear where a Party is changing their Party Name
- Allow Parties to enter an effective from date for the change to the Party Name
- Include a note that when making changes to their registration details, the changes will only be effected for their Party IDs. To change details for Party agents roles, they will need to submit a BSCP71/06 form.
- Have reference to BSCP65/01 on the form removed.

BSC Section A5.12 and A5.2.4 state that **the time and date of Withdrawal and Expulsion** respectively should be specified on the relevant forms. There is currently nowhere on the Withdrawals Notice Form or Expulsion Notice Form for this information to be entered.

It is suggested that a note is included on both forms stating that the Withdrawal/Expulsion will be effective from 23:59:59 on the date specified on the form.

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<b>Justification for Change</b> <i>(mandatory by originator)</i>  To bring BSCP65 in line with the BSC and clarify the processes Parties are required to undertake and adhere to.	
<b>Configurable Items Potentially Affected by Proposed Solution(s)</b> <i>(optional by Originator)</i>	
<b>Impact on Core Industry Documents</b> <i>(optional by originator)</i> None	
<b>Related Changes and/or Projects</b> <i>(mandatory by BSSCo)</i> None	
<b>Requested Implementation Date</b> <i>(mandatory by originator)</i>  <b>Reason:</b>	
<b>Agreed Release/Implementation Date</b> <i>(mandatory by BSSCo)</i>	

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***Date.....***

Attachments: Y/N\* (If Yes, No. of Pages attached:.....)  
*(delete as appropriate)*