



## Stage 01: Initial Written Assessment

# P301 'Replacement of National Consumer Council by Citizens Advice and Citizens Advice Scotland'

P301 proposes minor amendments to the BSC to reflect that the National Consumer Council has been abolished and its responsibilities have been transferred to Citizens Advice and Citizens Advice Scotland.



ELEXON recommends P301 is progressed as a Fast Track Self-Governance Modification and should be approved

This Modification is expected to impact:

- BSC Panel
- Citizens Advice and Citizens Advice Scotland
- ELEXON

What stage is this document in the process?

**01** Initial Written Assessment

**02** Definition Procedure

**03** Assessment Procedure

**04** Report Phase

224/07

P301  
Initial Written Assessment

30 April 2014

Version 1.0

Page 1 of 10

© ELEXON Limited 2014

## Contents

<b>1</b>	<b>Why Change?</b>	<b>3</b>
<b>2</b>	<b>Solution</b>	<b>4</b>
<b>3</b>	<b>Proposed Progression</b>	<b>6</b>
<b>4</b>	<b>Likely Impacts</b>	<b>8</b>
<b>5</b>	<b>Recommendations</b>	<b>9</b>
	<b>Appendix 1 – Glossary and References</b>	<b>10</b>

## About This Document

This document is an Initial Written Assessment (IWA), which ELEXON will present to the Panel on 8 May 2014. The Panel will consider the recommendations and agree how to progress P301.

You can find further information in the attached Modification Proposal (Attachment A), draft BSC legal text (Attachment B), and draft BSCP40 'Change Management' redlining (Attachment C).



### Any questions?

Contact:

**David Barber**



**david.barber@elexon.co.uk**



**020 7380 4327**

224/07

P301

Initial Written Assessment

30 April 2014

Version 1.0

Page 2 of 10

© ELEXON Limited 2014

# 1 Why Change?

## Background

On the 1 April 2014 the National Consumer Council (NCC) was abolished and its functions were transferred to Citizens Advice (the National Association of Citizens Advice Bureaux) and Citizens Advice Scotland (the Scottish Association of Citizens Advice Bureaux).

On 24 February 2014, the Authority issued a notice<sup>1</sup> advising of its decision to modify all [Standard Licence conditions](#), including the [Transmission Licence](#) to reflect the abolition of the NCC.

The changes to the Transmission Licence took effect on the 22 April, 56 days after the Authority's notice. As a result of this Modification has been raised to reflect these licence changes within the BSC.

## What is the issue?

The BSC requires amendment to align it with the Transmission Licence by replacing instances of NCC with Citizens Advice and Citizens Advice Scotland. P301 has been raised by National Grid to take forward these changes.

---

224/07

P301

Initial Written Assessment

---

30 April 2014

Version 1.0

---

Page 3 of 10

© ELEXON Limited 2014

---

<sup>1</sup> [Decision to modify the Standard Licence Conditions following the abolition of the National Consumer Council](#)

### Proposed solution

P301 proposes amendments to the BSC to reflect that the functions of the abolished NCC have been transferred to Citizens Advice and Citizens Advice Scotland.

The specific BSC sections that require amendment are set out below:

#### BSC Section B 'The Panel'

- Section B1.1.2(c). B2.3 and B2.3.1 covering the composition of the Panel and the appointment of Panel members by Citizens Advice and Citizens Advice Scotland.

Clarity will be added to Section B2.3.1 to make it clear that the two consumer Panel Member seats will remain unchanged. Two members from Citizens Advice or Citizens Advice Scotland can be appointed with the two bodies determining how these seats are filled.

For the avoidance of doubt there will continue to be only up to two consumer Panel Member seats.

#### BSC Section F 'Modification Procedures'

- Section F2.1.1(b) and F2.1.10(a) covering who can raise Modification Proposals and who will receive Modification documents.

#### BSC Section X Annex X-1 'General Glossary'

- Delete definition of 'National Consumer Council'
- Add new definition for 'Citizens Advice'
- Add new definition for 'Citizens Advice Scotland'

#### BSC Section Z 'Performance Assurance'

- Section Z2.1.2(e) covering who can attend the Performance Assurance Board meetings. Additional minor changes are proposed to restructure Section Z2.1.2(e) to make it easier to read and follow.

#### Other Code Subsidiary Document changes

Minor changes are also needed to BSC Procedure (BSCP)40 'Change Management' to replace instances of NCC with Citizens Advice and Citizens Advice Scotland.

## Justification against the Applicable BSC Objectives

By making these amendments it will ensure that the Code is aligned with the provisions in the Transmission Licence and provides clarity over which bodies can sit on the Panel and also raise Modification Proposals.

With this in mind the Proposer believes that this Modification Proposal will better facilitate Applicable BSC Objectives:

- (a) 'The efficient discharge of the Transmission Company of the obligations imposed upon it by the Transmission Licence' as the proposed changes will mean that the BSC is consistent with SLC C3 of the Licence; and
- (d) 'Promoting efficiency in the implementation of the Balancing and Settlement arrangements' by ensuring that the BSC provisions reflect the Transmission Licence conditions by removing any discrepancy between the two.

## Legal Text and Code Subsidiary Document changes

The proposed legal text can be found in Attachment B and the proposed changes to BSCP40 can be found in Attachment C.



---

### What are the Applicable BSC Objectives?

(a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence

(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System

(c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity

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

(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]

---

224/07

P301

Initial Written Assessment

---

30 April 2014

---

Version 1.0

---

Page 5 of 10

---

© ELEXON Limited 2014

We recommend that P301 progresses as a Fast Track Self-Governance Modification.

#### Why Fast Track Self-Governance?

A Modification Proposal can be progressed as a Fast Track Self-Governance Modification if the changes:

- meet the Self-Governance Criteria;
- fall within Section F2.1.1(d)(iv), in that the changes will rectify manifest errors to correct minor inconsistencies including updating names and typographical errors (i.e. 'housekeeping changes').

The Modification meets the Fast Track Self-Governance Criteria because:

- it satisfies the Self-Governance Criteria, as the changes having no material impact on consumers, competition, the Transmission System and/or BSC Governance as the changes are minor, correct inconsistencies between the BSC and the Transmission Licence and making sections easier to read; and
- the proposed changes will be updating names (by replacing NCC with Citizens Advice and Citizens Advice Scotland) in the BSC to align with the Transmission Licence.

Therefore the changes should be progressed as a Fast Track Self-Governance Modification

For a Modification to be treated as Fast Track Self-Governance the Panel must unanimously agree that the Modification meets the Fast Track Self-Governance Criteria and should be implemented.

#### Implementation Approach

If the Panel approves the Modification Proposal, we recommend that it is implemented **1 Working Day (WD)** following the end of the Fast Track Self-Governance objection window, if no objections are raised.

#### When would P301 be implemented if progressed as a Fast Track Self-Governance Modification?

If the Panel unanimously agrees to progress P301 as a Fast Track Self-Governance Modification and that it should be implemented, the Panel's decision along with the Fast Track Self-Governance Modification report will be published within 1WD and issued to the Authority, Transmission Company and each Party, in accordance with BSC Section F7.2.2.

The 15 WD objection window, will commence from this notification. If no objections are raised, P301 would then be implemented **1 WD** following the end of the objection window on **3 June 2014**.



#### Self-Governance Criteria

(a) it is unlikely to have a material effect on:

(i) existing or future consumers;

(ii) competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution, or supply of electricity;

(iii) the operation of the national electricity transmission system;

(iv) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and

(v) the BSC's governance procedures or modification procedures; and

(b) it is unlikely to discriminate between different classes of BSC parties.

224/07

P301  
Initial Written Assessment

30 April 2014

Version 1.0

Page 6 of 10

© ELEXON Limited 2014



## Timetable

The following Fast Track Self-Governance Modification timetable will be followed:

Proposed Progression Timetable for P301	
Event	Date
Present Initial Written Assessment to Panel	8 May 2014
Fast Track Self-Governance report and Panel decision published – 15 WD objection window commences	9 May 2014
Fast Track Self-Governance objection window closes	2 Jun 2014
P301 implemented 1 WD following end of objection Window	3 Jun 2014

### Fast Track Self-Governance Criteria

- Is a Modification which;
- (i) if implemented would satisfy the Self-Governance Criteria;
  - (ii) falls within the scope of Section F2.1.1(d)(iv) (without limiting the right of any person specified in paragraph 2.1.1 to propose a Fast Track Self-Governance Modification Proposal) and which is required to correct an error in the Code or as a result of a factual change, including but not limited to:
    - (a) updating names or addresses listed in the Code;
    - (b) correcting minor typographical errors;
    - (c) correcting formatting and consistency errors, such as paragraph numbering; or
    - (d) updating out of date references to other documents or paragraphs;

224/07

P301  
Initial Written Assessment

30 April 2014

Version 1.0

Page 7 of 10

© ELEXON Limited 2014

## 4 Likely Impacts

### Implementation Costs

Implementation costs	
ELEXON effort	1 man day, equating to approximately £240
<b>Total costs</b>	<b>Approximately £240</b>

### Impacts

Impact on BSC Parties and Party Agents	
No impacts	

Impact on Transmission Company	
No impact	

Impact on Code	
Code Section	Impact
Section B	Replace instances of NCC with Citizens Advice and Citizens Advice Scotland
Section F	Replace instances of NCC with Citizens Advice and Citizens Advice Scotland
Section X Annex X-1	To remove the definition of NCC Add definitions of Citizens Advice and Citizens Advice Scotland
Section Z	Replace instances of NCC with Citizens Advice and Citizens Advice Scotland

Impact on Code Subsidiary Documents	
CSD	Impact
BSCP40	Replace instances of NCC with Citizens Advice and Citizens Advice Scotland

224/07

P301

Initial Written Assessment

30 April 2014

Version 1.0

Page 8 of 10

© ELEXON Limited 2014



## 5 Recommendations



### Fast Track Self-Governance Modification

We recommend that the Panel progresses P301 as a Fast Track Self-Governance Modification and that it should be approved.

We invite the Panel to:

- **AGREE** that P301 should be progressed as a Fast Track Self-Governance Modification;
- **AGREE** that P301:
  - **DOES** better facilitate Applicable BSC Objective (a); and
  - **DOES** better facilitate Applicable BSC Objective (d);
- **AGREE** that P301 should be **approved**;
- **AGREE** an Implementation Date of:
  - **1 Working Day** after the Fast Track Self-Governance objection window closes; and
- **AGREE** the legal text and BSCP40 redlined changes.

224/07

P301  
Initial Written Assessment

30 April 2014

Version 1.0

Page 9 of 10

© ELEXON Limited 2014

## Appendix 1 – Glossary and References

### Glossary of defined terms

Acronyms and other defined terms used in this document are listed in the table below.

Glossary of Defined Terms	
Acronym	Definition
BSC	Balancing and Settlement Code
BSCP	Balancing and Settlement Code Procedure
NCC	National Consumer Council
SLC	Standard Licence Conditions
WD	Working Day

### External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
3	Decision to modify the Standard Licence Conditions following the abolition of the National Consumer Council	<a href="https://www.ofgem.gov.uk/publications-and-updates/decision-under-section-11a-electricity-act-1989-and-section-23-gas-act-1986-modification-licences-following-abolition-national-consumer-council?utm_source=Ofgem%20Website%20Mailing%20List&amp;utm_campaign=d4ea6f08c1-Ofgem_Email_Alert2_24_2014&amp;utm_medium=email&amp;utm_term=0_a9e586c268-d4ea6f08c1-376723873">https://www.ofgem.gov.uk/publications-and-updates/decision-under-section-11a-electricity-act-1989-and-section-23-gas-act-1986-modification-licences-following-abolition-national-consumer-council?utm_source=Ofgem%20Website%20Mailing%20List&amp;utm_campaign=d4ea6f08c1-Ofgem_Email_Alert2_24_2014&amp;utm_medium=email&amp;utm_term=0_a9e586c268-d4ea6f08c1-376723873</a>
3	Link to Standard Licence Conditions	<a href="https://www.ofgem.gov.uk/licences-codes-and-standards/licences/licence-conditions">https://www.ofgem.gov.uk/licences-codes-and-standards/licences/licence-conditions</a>
3	Link to Transmission Licence	<a href="https://epr.ofgem.gov.uk/Content/Documents/Electricity%20transmission%20full%20set%20of%20consolidated%20standard%20licence%20conditions%20-%20Current%20Version.pdf">https://epr.ofgem.gov.uk/Content/Documents/Electricity%20transmission%20full%20set%20of%20consolidated%20standard%20licence%20conditions%20-%20Current%20Version.pdf</a>

224/07

P301  
Initial Written Assessment

30 April 2014

Version 1.0

Page 10 of 10

© ELEXON Limited 2014