

Request to Raise a Modification Proposal

ELEXON

What stage is this document in the process?

▶ **01** Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Request to Raise: 'Required Housekeeping Changes to Implement P291 and P295'

This Modification proposes minor changes to BSC Sections Q and V to ensure the implementation of the P291 legal text on 31 December 2014 will not impact the approved P295 solution, which will be implemented on 16 December 2014.



ELEXON recommends that a Modification is raised and progressed as a Fast Track Self-Governance Modification, with a recommendation to approve.

This Modification is expected to impact:

- ELEXON

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Any questions?

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About This Document

This document is a Request to Raise a Modification which ELEXON will present to the Panel on 14 August 2014. The Panel will consider whether to raise the Modification and agree how to progress it.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach.
- Attachment A contains the Modification Proposal Form.
- Attachment B contains the draft redlined changes to the BSC for this Modification.

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1 Why Change?

Background

[P291¹ 'REMIT Inside Information Reporting Platform for GB Electricity'](#) has been approved for implementation on 31 December 2014. P291 requires changes to the Balancing Mechanism Reporting Service (BMRS) and BSC Sections Q and V. These changes are required to enable the reporting of necessary information to meet the requirements of The Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT) regulation.

Subsequent to the P291 decision, [P295² 'Submission and publication of Transparency regulation data via the BMRS'](#) has been approved for implementation on 16 December 2014. P295 requires changes to the BMRS and BSC Sections Q and V to enable the reporting and forwarding of required Transparency regulation data.

When P291 was approved by the Authority in August 2013, the BSC legal text changes directed as part of the Modification were drafted against Section Q v22.0 and Section V v26.0 (the baseline at the time).

When P295 was approved by the Authority on 22 January 2014, the BSC legal text changes for the Modification were also drafted against Section Q v22.0 and Section V v26.0. This was necessary and correct as P295 is will be implemented prior to P291 and therefore must be drafted against the current BSC baseline.

What is the Issue?

There are six instances (as listed below) where both P291 and P295 impact the same text:

- Section Q 1.1.1
- Section V 2.2.1
- Section V new 2.2.2B (introduced by P291)
- Section V 2.3.3
- Section V 2.5.1
- Section V Annex V-1

Since P291 was drafted before P295 was raised, the P291 legal text does not take into account those changes approved under P295, for these six instances. This in effect means that when P291 is implemented on 31 December 2014, it will overwrite the changes introduced by P295 on 16 December 2014 (for the six instances where both Modifications impact the same sections).

For example, both P291 and P295 introduce a new BSC Section V 2.3.3 (d). This means that a change is required to the approved P291 legal text to allow for the introduction of a new BSC Section V 2.3.3 (e) instead, as shown below in an excerpt from the draft redlined BSC changes for this Modification (in blue for P295 and in red for P291):

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¹ Further information about P291 can be found on the [P291](#) page of the ELEXON website.

² Further information about P295 can be found on the [P295](#) page of the ELEXON website.

Amend paragraph 2.3.3 to read as follows:

2.3.3 BMRS data will be available on the BMRS as follows:

- (a) data provided by the Transmission Company pursuant to Section Q (and listed in Table 1) will be available within 5 minutes after the BMRA received such data from the Transmission Company;
- (b) data relating to a Settlement Period and established by the BMRA in accordance with paragraph 2.6 will be available within 45 minutes after the end of the relevant Settlement Period;~~and~~
- (c) data provided by the BSCCo pursuant to Section Q (and listed in Table 1A) will be available within 1 Business Day after the BMRA received such data from the BSCCo; ~~and~~
- ~~(d) Transparency Regulation Data listed in Table 1B will be published as soon as reasonably practicable (taking into account any technical constraints) after such data is received by the BMRA; and~~
- ~~(e) Inside Information Data will be published as soon as reasonably practicable (taking into account any technical constraints) after being received from the Transmission Company or BSCCo.~~

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Proposed solution

In order to facilitate the implementation of both the P291 and P295 solutions, this Modification proposes a set of amalgamated legal text to allow for P291 to be implemented without overwriting the approved changes introduced by P295.

Amendments will be made to the following six instances where legal drafting for both Modifications interact:

- Section Q 1.1.1 – Create sub-bullet (k), meaning that the sub-bullet (j) introduced by P295 is not overwritten.
- Section V 2.2.1 – Add Table 1C in addition to Table 1B.
- Section V new 2.2.2B – Create new 2.2.2C, meaning that the new 2.2.2B introduced by P295 is not overwritten, also Reference Table 1C instead of Table 1B.
- Section V 2.3.3 – Create sub-bullet (e), meaning that the sub-bullet (d) introduced by P295 is not overwritten.
- Section V 2.5.1 – Create sub-bullet (f), meaning that the sub-bullet (e) introduced by P295 is not overwritten.
- Section V Annex V-1 – Add Table 1C in addition to Table 1B.

There will be no changes to the approved P291 or P295 wording, except where the removal or addition of words like 'and' are required (i.e. for addition or removal of bullet points) as well as changes to table and paragraph numbers.

Attachment A contains the draft BSC legal text we ask the Panel to approve. For information, Attachment B highlights changes introduced under P295 and those introduced under P291, showing the six instances where both Modifications interact.

Impacts and costs

This Modification will not impact BSC Parties, Party Agents or the Transmission Company. It only ensures the correct implementation of both the P291 and P295 approved solutions.

The estimated central implementation costs will equate to £240, or one ELEXON man day.

Impact on Code	
Code Section	Potential Impact
Section Q	Changes will be required to implement the solution.
Section V	

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Applicable BSC Objectives

ELEXON believes that this Modification would better facilitate the achievement of:

- **Applicable BSC Objective (d)** as making these required housekeeping changes will allow for both P291 and P295 to be implemented successfully and as intended, promoting efficiency.

Implementation approach

It is recommended that this Modification be implemented on **31 December 2014** (simultaneously with P291) to enable the proposed legal text changes to take precedence over the previously approved P291 legal text.



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]

(f) Implementing and administrating the arrangements for the operation of contracts for difference arrangements that facilitate the operation of a capacity market pursuant to EMR legislation.

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Next steps

We believe that this Modification should be progressed as a Fast Track Self-Governance Modification³.

The proposed changes to BSC Sections Q and V are housekeeping changes only, which are required to enable both P291 and P295 to be implemented successfully and as intended. Therefore, we believe that this Modification meets the Fast Track Self-Governance Modification criteria.

If the Panel **unanimously** agrees⁴ that the Modification should be progressed as a Fast Track Self-Governance Modification, and approve the draft legal text, ELEXON will issue the Fast Track Self-Governance Modification Report (including the approved BSC legal text) to the Authority, the Transmission Company and BSC Parties. There will then be a 15 Working Day appeal window to raise an objection to the implementation of the Modification.

If an objection is received, the implementation of the Modification will be suspended and the objection tabled at the next available Panel meeting; which in the case of this Modification would be on 11 September 2014.

If no objections are received, the Panel will be advised and the Modification will be implemented on 31 December 2014.

Fast Track Self-Governance Criteria

Means a Modification Proposal which:

- (i) if implemented would satisfy the Self-Governance Criteria; and
- (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;

³ Further information about the Fast Track Self-Governance Modification process can be found in [BSC Section F, BSCP40](#) and on the [P296](#) page of the ELEXON website.

⁴ If one or more Panel Members believe the Modification does not meet the Fast Track criteria, the Panel can decide to treat the Modification as either a standard Self-Governance Modification or a standard Modification.

4 Recommendations

We invite the Panel to:

- **RAISE** the Modification Proposal in Attachment A;
- **AGREE** that this Modification should be progressed as a Fast Track Self-Governance Modification;
- **AGREE** that this Modification:
 - **DOES** better facilitate Applicable BSC Objective (d);
- **AGREE** that this Modification should be **approved**;
- **AGREE** an Implementation Date of:
 - **31 December 2014**;
- **AGREE** the proposed legal text;
- **NOTE** that this Modification will become P311; and
- **NOTE** that ELEXON will issue the P311 Fast Track Modification Report (including the draft BSC legal text), which will then be subject to a 15 Working Day objection period.

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Appendix 1: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Glossary of Defined Terms	
Acronym	Definition
BMRS	Balancing Mechanism Reporting Service
REMIT	The Regulation on Wholesale Energy Markets Integrity and Transparency

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	P291 page of the ELEXON website	http://www.elexon.co.uk/mod-proposal/p291/
3	P295 page of the ELEXON website	http://www.elexon.co.uk/mod-proposal/p295/
6	BSC Sections page of the ELEXON website	http://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/
6	BSCP40 page of the ELEXON website	http://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
6	P296 page of the ELEXON website	http://www.elexon.co.uk/mod-proposal/p296/

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