

# 248/09 - REQUEST TO DEFER P321 FROM JUNE 2016 RELEASE

**MEETING NAME** BSC Panel

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**Purpose of paper** For Decision

**Classification** Public

**Summary** The Panel is asked to write to Ofgem to request a deferral of the implementation of P321 from the June to the November 2016 Release.

## 1. What is Modification P321

- 1.1 P321 'Publication of Trading Unit Delivery Mode' proposes to publish information on the direction of delivery (delivering or offtaking) of Trading Units, for each Grid Supply Point (GSP) Group, in each Settlement Period. The information can currently be obtained through Balancing Services Use of System (BSUoS) bills and Transmission Loss Multiplier (TLM) values. Through publication of the data on a new page on BMRS there is increased transparency of the direction of delivery and the consequent data that drives any changes in charges. Therefore both BSC Parties and customers (non domestic customers of Suppliers who pass these charges through) can validate what they are being charged.
- 1.2 P321 was approved as a Self Governance Modification by the Panel in October 2015 and was proposed for inclusion in the June 2016 Release.

## 2. Why does ELEXON wish to defer implementation from June 2016

- 2.1 ELEXON believes it is beneficial to defer the implementation of P321 to the November release for the following reasons:
  - It simplifies the June Release at a time when we are undergoing a transfer of service from our current Application Management and Development (AMD) service provider;
  - It reduces a risk on BMRS Phase 3 delivery which is being developed in parallel;
  - It eliminates potential additional costs (in the order of >£100K) which are specific to implementing P321 during this period; and
  - It eliminates the need to consider the need to potentially develop changes to old BMRS in the event of any delay to BMRS Phase 3 (ELEXON would not wish to consider this given that we have ceased any development of old BMRS some time ago).
- 2.1.1 We are currently implementing the final phase of the new BMRS service. This is the culmination of a two year project to redevelop and redesign the BMRS. Testing of the final phase is being undertaken during the first quarter of 2016. The implementation of P321 requires development of additional functionality onto a system which is still undergoing testing. This creates additional risk for both the new BMRS development and the P321 solution. ELEXON believes it is practical to defer the P321 implementation and eliminate the risk to both projects.
- 2.1.2 If we were to develop the P321 solution in parallel with the BMRS Phase 3 testing we would need additional software licences and test environments, this creates additional cost to implementation specific to the June Release. This cost can be avoided if P321 is deferred to November.

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- 2.1.3 We are in the process of transferring the responsibility for the AMD services, this process commences in January 2016 and requires a handover and knowledge transfer between our service providers. The outgoing AMD will deliver the June Release as its final release deliverable. It would simplify the handover approach if we were to defer P321.
- 2.2 The original rationale, from a systems point of view, for including P321 in the June 2016 release was related to the fact the central systems impact assessment identified a change to SVAA. SVAA changes were already agreed for other changes within the June Release so it appeared logical to implement P321 at the same time. However we have subsequently identified that no SVAA changes are required for P321.
- 2.2.1 As a result it would be sensible, from a central systems viewpoint, to implement P321 in November 2016 as we are already implementing other BMRS changes in November 2016 (P297).
- 2.3 Section F2.11.5 makes provision for ELEXON to report to the Panel if ELEXON believes that:
- (a) it appears, in BSCCo's reasonable opinion, that problems may arise, or have arisen, in the implementation of an Approved Modification in accordance with the project brief prepared pursuant to paragraph 2.6.6(e); and/or*
- (b) BSCCo has reason to believe that the changes necessary to BSC Systems and processes will not have been completed by the Implementation Date; and/or*
- (c) BSCCo becomes aware of any circumstances which might otherwise prevent or delay the full and timely implementation of the Approved Modification.*
- 2.4 This paper constitutes a 'report' to the Panel as referred to in F2.11.5. ELEXON is not currently saying that P321 will not be delivered but, in accordance with reference to F2.11.5(c), wishes to de-risk the potential for delay to the implementation of both P321 and BMRS Phase 3 by deferring P321 to the November 2016 Release.

### 3. What is the view of the proposer?

- 3.1 ELEXON discussed the proposal for deferral with the Proposer. The Proposer is disappointed and frustrated that a deferral is being requested as they do not wish the implementation to be deferred. It is possible that any Suppliers who pass through these costs to customers will have informed them that the information will be available from June.
- 3.2 ELEXON is exploring the potential to publish the information using a manual process as described in section 5.

### 4. Steps required to approve a revised implementation date

- 4.1 Section F2.11.8 makes provision for the Panel to request from the Authority an extension to the Implementation Date if it becomes aware of circumstances that may lead to a delay in implementing a Modification.
- 4.2 P321 is a Self Governance Modification and was approved by the Panel. The Panel is therefore asked to write to the Authority to request an extension to the Implementation Date for P321 to 3 November 2016.
- 4.3 However, reviewing the BSC has raised an interesting point with regards to amending implementation dates that were not approved by the Authority. Does the Panel require Ofgem approval or is the Panel permitted to amend the implementation date for Self Governance Modifications? The BSC could be clearer on this and this may be something for consideration under any wider cross code governance changes that may be considered by the Authority. If Ofgem provides a view that changing an Implementation Date of a Self Governance Modification can be done by the Panel, the Panel are asked to approve the change of implementation date.

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## 5. Can we make P321 data available in the meantime?

- 5.1 The information that will be published under P321 is currently available to market participants from looking at Balancing Services Use of System (BSUoS) bills and Transmission Loss Multiplier (TLM) values. However this is not as transparent or easily accessible as the P321 solution.
- 5.2 ELEXON is currently investigating how we can extract the relevant information and provide the same data outputs as P321 in another format until the November implementation (e.g. on the ELEXON website or mailed to interested Parties).

## 6. Recommendations

The Panel is invited to:

- a) **AGREE** that P321 should be deferred from 30 June 2016 to 3 November 2016; and
- b) **WRITE** to the Authority to request that the implementation of P321 be deferred from 30 June 2016 to 3 November 2016.