

# CP Assessment Report

## CP1480 'Creation of a new authorisation category for corrections to Bid-Offer Acceptance Related Data'

**ELEXON**



### Committee

Imbalance Settlement Group  
Supplier Volume Allocation Group

### Recommendation

Reject

### Implementation Date

2 November 2017  
(November 2017 Release)



### Contact

**Claire Kerr**

020 7380 4293

[claire.kerr@elexon.co.uk](mailto:claire.kerr@elexon.co.uk)



### Contents

<b>1</b>	<b>Why Change?</b>	<b>2</b>
<b>2</b>	<b>Solution</b>	<b>3</b>
<b>3</b>	<b>Impacts and Costs</b>	<b>6</b>
<b>4</b>	<b>Implementation Approach</b>	<b>7</b>
<b>5</b>	<b>Initial Committee Views</b>	<b>8</b>
<b>6</b>	<b>Industry Views</b>	<b>11</b>
<b>7</b>	<b>Recommendations</b>	<b>14</b>
	<b>Appendix 1: Glossary &amp; References</b>	<b>15</b>

### About This Document

This document is the Change Proposal (CP) Assessment Report for CP1480 which ELEXON will present to the Supplier Volume Allocation Group (SVG) on 4 July 2017 and the Imbalance Settlement Group (ISG) on 25 July 2017. The ISG and SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1480.

There are five parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's and ISG's initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachments A and B contain the proposed redlined changes to deliver the CP1480 solution.
- Attachment C contains the full responses received to the CP Consultation for CP1480 v1.0 in January 2017.
- Attachment D contains the full responses received to the CP Consultation for CP1480 v2.0 in May 2017.

SVG197/03

CP1480  
CP Assessment Report

26 June 2017

Version 1.0

Page 1 of 16

© ELEXON Limited 2017



## What is the current process?

The Transmission Company (TC) must send Bid-Offer Acceptance (BOA) Related Data to the Settlement Administration Agent (SAA). The TC can correct errors in this data, if they identify the error at least eight Working Days (WDs) before the Initial Settlement Run (SF). After this, only errors of £3,000 or above can be corrected through the Trading Disputes process. Errors can be related to data that is incorrect, non-applicable or missing. The full process, including timescales, is set out in [Balancing and Settlement Code Procedure \(BSCP\) 18 'Corrections to Bid-Offer Acceptance Related Data'](#). As part of this process, the TC must send details of the proposed correction to the Party involved and gain their consent for the correction to be made. The TC will then forward this on to the SAA.

## What is the issue?

BSCP18 does not permit the TC to correct BOA Related Data without the relevant Party's consent. The Proposer contends that BSCP18 is ambiguous on who at the relevant Party may authorise such error corrections. The BSCP states that the TC must contact 'authorised personnel at BSC Party', but does not explicitly state who this personnel should be or how they are authorised. This lack of clarity has created problems for the TC when trying to identify the right individual to contact and can cause delays.

The TC is currently using a workaround, which involves contacting the BSC Service Desk to request Authorised Persons' contact details for a particular Party. The BSC Service Desk then contacts the Party to ask if they are happy for the contact details to be shared with the TC. This process is inefficient and does not always provide the TC with the information it requires if a Party does not respond.

The identified defect is therefore that the TC cannot obtain a contact for each Party for the purposes of authorising BOA Related Data corrections.

## What happens if the Transmission Company is unable to gain consent?

If the TC is unable to gain consent for the correction then the error will enter Settlement at SF and can affect the System Price (i.e. the imbalance price). The error can be raised as a Trading Dispute in accordance with [BSC Section W 'Trading Disputes'](#) and the process set out in [BSCP11 'Trading Disputes'](#). However if the error does not meet the criteria for a Trading Dispute, for example because its materiality is less than £3,000, then it cannot be resolved. If it does become a Trading Dispute, the process can be lengthy and require extra effort from Parties and ELEXON. It is therefore preferable to correct the error before SF.

The TC has informed ELEXON that there are at least two or three incidents per month that require it to seek consent for corrections. It notes that it has difficulty identifying a suitable contact or is unable to make contact with the Party at all.

## Bid-Offer Acceptance Related Data

In BSCP18, the term 'Bid-Offer Acceptance Related Data' is used to refer to any of the following:

- Final Physical Notification (FPN),
- Bid-Offer Data (BOD),
- Quiescent Physical Notification (QPN),
- Bid-Offer Acceptance Level (BOAL) and
- Bid-Offer Acceptance Level Flagged (BOALF) data.

SVG197/03

CP1480

CP Assessment Report

26 June 2017

Version 1.0

Page 2 of 16

© ELEXON Limited 2017

### Proposed solution

[CP1480 'Creation of a new authorisation category for corrections to BOA Related Data'](#) was raised by National Grid Transmission Plc on 28 November 2016. It seeks to provide clarity on who can provide consent for corrections to BOA Related Data, by creating a new category of Authorised Person (Category "E") specifically for that activity within [BSCP38 'Authorisations'](#).

Nominating a Category E Authorised Person will be optional for Parties under CP1480. This is because BSCP38 only requires Parties to nominate at least one individual to be a Category A Authorised Person. Category A signatories then have the option to nominate individuals for the other categories of Authorised Persons, but are not required to do so.

In addition to creating the new Category E, CP1480 also allows Category A Authorised Persons to consent to their contact information being provided to the TC and used for the purpose of authorising BOA Related Data corrections in accordance with BSCP18. CP1480 requires the TC to use the Category E contacts in the first instance, but allows it to use the Category A contacts where a Category E signatory has not been nominated or cannot be contacted.

Due to data protection principles, CP1480 will only allow ELEXON to pass individual Category A or Category E contact details<sup>1</sup> to the TC where the individual signatories have explicitly consented to their details being shared with and used by the TC. We explain this in more detail below.

### Obtaining consent

The form which Parties use to create and amend Authorised Persons, in BSCP38 section 5.1, will be amended as follows:

- When creating or amending a Category A Authorised Person, that individual Category A signatory will be required to complete a new declaration in Part A of the form confirming whether or not they consent to their contact details being used by the TC for the purpose of BOA Related Data corrections under BSCP18. Because this is only one part of the Category A role, the individual Category A signatory will have the option to either consent, or not consent, to its contact details being used for this purpose.
- If a Category A Authorised Person chooses to create a Category E Authorised Person, then that individual Category E signatory must complete a new declaration in Part C of the form confirming that they consent to their contact details being used by the TC for the purposes of BOA Related Data corrections under BSCP18. If this declaration is not completed, the new Category E nomination will not be valid.

Parties will be required to complete equivalent online declarations if using the online form on the [ELEXON Portal](#), rather than the BSCP38/5.1 form.

Under the existing rules in BSCP38 Section 1.3, when Parties first register any Authorised Person they must provide a password. This password is then used for authorisation purposes along with the individual's registered email address (or their registered signature for post/fax).

<sup>1</sup> Contact details means the Party which they represent, and their email and telephone contacts.

Under CP1480, the CRA will not share any Category A signatories' passwords with the TC. BSCP38 will state that any acceptance or rejection of a BOA Related Data correction will be valid if it originates from the email address registered to the relevant Category A or Category E Authorised Person. Therefore neither Category A or E Authorised Persons will be required to provide the TC with a password for this purpose.

BSCP38 will place an obligation on the TC to ensure that it only uses Category A and E contact details for the purpose of seeking consent to correct BOA Related Data. It will prohibit the TC from using the details for any other purpose or from sharing them with any other third party. The TC will have access to the consented Category A and Category E information via the ELEXON Portal.

The Central Registration Agent (CRA) will be responsible for adding any new and valid Category E Authorised Persons to the Authorisation Register that it maintains under BSCP38. It will also be responsible for recording which Category A Authorised Persons have, and have not, consented to their contact details being used by the TC. The CRA shall be responsible for ensuring that it only provides the TC with contact details where the relevant individuals have consented.

## Proposer's rationale

The Proposer believes that by having a clearly defined process, with specific individuals who have the authorisation to provide consent to BOA Related Data corrections, the time taken to complete the process and the risk of errors entering Settlement will be reduced.

## Proposed redlining

Attachments A and B contain the proposed changes to BSCP18 and BSCP38 respectively to deliver the CP1480 solution.

## History of proposed solution

### CP1480 v1.0

CP1480 v1.0 proposed to only create a new Category E Authorised Person category for the purposes of BOA Related Data corrections. However, because creating a Category E signatory is optional, ELEXON, the ISG and the SVG believed that this would not address the identified defect.

ELEXON noted that some Parties (e.g. smaller organisations) choose to only use Category A Authorised Persons and therefore choose not to nominate other categories of signatory. CP1480 v1.0 did not permit the TC to use Category A signatories where no Category E was available. If a Party did not nominate a Category E Authorised Person then, under CP1480 v1.0, the TC would be unable to gain consent to any BOA Related Data corrections for that Party. The SVG believed that this would be worse (more restrictive) than the current arrangements where authorised personnel are not specified and the TC can try any/multiple contacts at a Party.

---

SVG197/03

CP1480  
CP Assessment Report

---

26 June 2017

---

Version 1.0

---

Page 4 of 16

---

© ELEXON Limited 2017

## CP1480 v2.0

In addition to enabling Parties to optionally create one or more new Category E Authorised Persons, CP1480 v2.0 also enables Parties to optionally consent to their Category A Authorised Person(s) being used for the purposes of BOA Related Data corrections. This means that, according to its individual preference, a Party could choose to use Category A contact(s) only, Category E contact(s) only, or both Categories (with Category A being used where Category E is unavailable).

The ISG and SVG originally proposed that, to address the limitations of CP1480 v1.0 and to fully address the identified defect, the TC should be able to use Category A contact details where no Category E is available. They believed that this would ensure that the TC always has a minimum of one contact per Party. They noted that, while Category A Authorised Persons could be company directors rather than operational contacts, using their details as a backstop could incentivise them to nominate Category E signatories if other contacts would be more appropriate.

However, in drafting v2.0 of the CP solution we have been unable to fully deliver the ISG's and SVG's intention, and thus to fully address the defect. This is because, under CP1480 v2.0, a Party may still choose not to nominate any Category E Authorised Person or consent to the use of any Category A Authorised Person for the purpose of BOA Related Data corrections. In this situation, the TC would not be able to gain consent to any BOA Related Data corrections for that Party. See below for more details.

### Legal view on solution

Although it is not mandatory in the UK to obtain the consent of data subjects before processing personal data, data controllers often view consent as the simplest way to justify processing. This is required under the first data protection principle in the [Data Protection Act \(DPA\) 1998](#). The first principle requires holders of personal information to use that information lawfully and fairly and in accordance with the provisions of the DPA. According to the [Information Commissioner's Office](#), amongst other things, information holders should handle people's personal data only in ways they would reasonably expect at the time they entered the relationship with the information holder (such that they can make an informed choice on whether or not to enter that relationship).

To provide the TC with any individual Authorised Person's contact details for the purposes of authorising corrections to BOA Related Data, ELEXON would therefore first need to obtain that individual's explicit consent to their contact details being shared with or used by the TC for that purpose. While CP1480 v2.0 introduces a process in the BSCPs to seek consent from all Category A and Category E Authorised Persons, we cannot guarantee that all of these individuals will consent.

Consequently, due to the above, we are unable to fully address the ISG and SVG's concerns<sup>2</sup>. ELEXON has been unable to identify any further changes to the CP1480 solution that could overcome these data protection limitations and fully address the defect identified by the TC. We note that the current baseline does not limit corrections to being authorised by a particular person or persons. As such, we recommend that this CP is rejected as we believe it has not been proven to be better than the baseline.

---

SVG197/03

CP1480  
CP Assessment Report

---

26 June 2017

---

Version 1.0

---

Page 5 of 16

---

© ELEXON Limited 2017

---

<sup>2</sup> For the full ISG and SVG's discussions on CP1480, please see section 5.

## 3 Impacts and Costs

### Central impacts and costs

#### Central impacts

The CRA will need to amend its systems and the ELEXON Portal in order to:

- Add any new and valid (consented) Category E Authorised Persons to the Authorisation Register;
- Record within the Authorisation Register which Category A Authorised Persons have consented to sharing their contact details with the TC;
- Allow the TC to access the consented Category E and Category A contact details;
- Enable Parties to access their own Category E details; and
- Implement equivalent consent statements in the online ELEXON Portal authorisation forms to those introduced in the BSCP38 form.

The CRA will also undertake the following exercises:

- As a one-off exercise during the implementation of CP1480, it will contact all Category A signatories asking them whether they wish to nominate new Category E contacts and/or share their Category A contact details with the TC for the purposes of BOA Related Data corrections.
- Once a year, as already required by BSCP38 Section 3.2 for all categories of Authorised Person, the CRA will ask Parties to confirm that their Authorised Persons' contact details are up-to-date.

ELEXON will make the necessary BSCP changes, which will require one WD of effort.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none"><li>• BSCP18</li><li>• BSCP38</li></ul>	<ul style="list-style-type: none"><li>• CRA</li><li>• ELEXON Portal</li></ul>

#### Central costs

The central implementation costs for CP1480 will be approximately **£10,000**. This includes costs to deliver the above changes to systems and documents.

### BSC Party & Party Agent impacts and costs

CP1480 is expected to impact Parties that participate in the Balancing Mechanism (BM) (i.e. Suppliers, generators and non-physical traders), if they choose to give consent to share Category A Authorised Person information and/or create a Category E Authorised Person(s). Such Parties will have to fill out the BSCP38/5.1 form and may need to establish processes and roles for Category E Authorised Persons. We do not expect that other types of Party will assign a Category E signatory.

SVG197/03

CP1480  
CP Assessment Report

26 June 2017

Version 1.0

Page 6 of 16

© ELEXON Limited 2017

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
<ul style="list-style-type: none"> <li>Transmission Company</li> </ul>	Will have access to consented Category A and Category E contact details.
<ul style="list-style-type: none"> <li>Generators</li> <li>Suppliers</li> </ul>	May choose to nominate individuals for Category E authorisation and give consent to share Category A information.

## CP Consultation responses

Three responses were received in total to the CP1480 v1.0 and CP1480 v2.0 Consultations, with one of these respondents providing a view on both solutions.

Two of the three respondents to the CP Consultations indicated that there would be impacts and costs associated with implementing CP1480 v1.0 and CP1480 v2.0. The Proposer of the CP commented that, by having a clearly defined process with specific individuals who have the authorisation to provide consent to BOA data corrections, CP1480 v2.0 will speed up the process and reduce the chance of errors entering Settlement.

The respondent who provided a response to both Consultations emphasised in both responses that this change would be an increased burden on their Settlement team to provide cover for the Authorised Person. They advised that these costs would be ongoing and were difficult to quantify. Additionally they highlighted that at least one senior manager and their first line reports would require training and support to any Category "E" or Category "A" Authorised Persons if their experience and knowledge was not suitable. This again would require an additional cost to the Party.

The other respondent, who noted that they were a new entrant, did not foresee any impacts and costs associated with implementing CP1480 v1.0. They noted that as they are new to the market, they are taking adequate precautions to set up their system. Subsequently, they did not envisage any costs with implementing this change.

## 4 Implementation Approach

### Recommended Implementation Date

CP1480 v2.0 is proposed for implementation on **2 November 2017**, as part of the November 2017 BSC Systems Release. This is the next available Release that this CP can be included in.

## CP Consultation responses

Of the three overall respondents to the Consultations, two agreed and one disagreed with the proposed Implementation Date.

The respondent who disagreed with the Implementation Date was the respondent that disagreed with the CP. They commented that they believed there was other, less cumbersome and bureaucratic, options highlighted by ELEXON and by the ISG and SVG. Further details of these can be found in section 5 of this paper. The respondent did not provide any further comments on the Implementation Date itself.

SVG197/03

CP1480  
CP Assessment Report

26 June 2017

Version 1.0

Page 7 of 16

© ELEXON Limited 2017



### SVG's initial views

CP1480 was presented to the SVG at its meetings on 3 January 2017 ([SVG191/07](#)) and 28 February 2017 ([SVG193/06](#)).

During its initial discussion of CP1480 v1.0, the SVG noted that the defect identified by the Proposer is that the TC cannot obtain a contact for each Party for the purposes of authorising BOA Related Data corrections. It noted it is only mandatory for Parties to nominate Category A Authorised Signatories and that provision of all other categories of Authorised Person is optional. Some SVG Members disagreed with the CP in principle, believing that the problem could be more efficiently solved outside the BSC. Some Members argued that the proposed solution would not achieve the Proposer's desired outcome and that the CP would therefore not be an efficient use of BSC resources. However, the SVG noted that CP1480 would proceed to consultation if the Proposer still wished to progress it.

The SVG agreed that there were potential limitations with the proposed solution and discussed several alternative options including:

1. The TC could create its own contact list outside the BSC, without the need for a new BSC authorisation category;
2. BSCP18 could be amended to allow the TC to correct BOA Related Data if it has notified the Party and the Party has not objected within a set timeframe (rather than requiring the Party's explicit consent) – an SVG Member suggested that there may need to be a monetary threshold above which explicit consent is still required. (This solution option would require a different CP); and
3. The TC could utilise its other existing contacts with Parties under the Grid Code and the Connection and Use of System Code (CUSC), e.g. for control rooms/invoicing teams, to identify the correct individuals for consenting to BOA Related Data corrections.

The SVG discussed how and why errors occur in BOA Related Data, noting that this was unclear from the CP. A Member suggested that the TC should tighten its internal processes to prevent such errors. Other Members noted that errors (e.g. transcription errors) can occur where there is a system outage and BOAs are issued manually. Members noted that the errors may not meet the criteria for a Trading Dispute and that the BSCP18 process is designed to correct them before they enter Settlement.

Following responses received to the CP1480 v1.0 Consultation, the SVG agreed that the original CP1480 solution as proposed could not be guaranteed to address the identified defect. This is because not all Parties will necessarily nominate the new Category E Authorised Person created by CP1480. Because the solution restricted the authorisation of BOA Related Data corrections to Category E signatories only, if a Party did not nominate a Category E Authorised Person then the TC would be unable to obtain consent to any BOA Related Data corrections for that Party. The SVG believed that this could leave the TC worse off than under the current arrangements (where authorised personnel are not specified, and so the TC can try any/multiple contacts at a Party).

The SVG considered that the only way the CP solution could be amended to fully address the defect would be to allow Category A Authorised Persons to make corrections and to provide the TC with the Category A Authorised Person contact details as a backstop, if no



Category E contact is available. The SVG noted that Category A signatories may not be the appropriate contacts for corrections to BOA Related Data, since they are often company directors. However, it considered that using these contacts as a backstop would provide an incentive for Parties to nominate a more appropriate Category E signatory, particularly as only the Category A signatory can nominate other categories of Authorised Person.

Some SVG Members reiterated their view that the TC could address the issue by implementing other solutions outside the BSC. However, they noted that they were required to decide whether CP1480 would better facilitate achievement of the Applicable BSC Objectives compared with the current arrangements. The SVG noted that the main difference between the current arrangements and CP1480 is that the CP puts the onus on the Party to provide the appropriate contact(s), whereas the existing process puts the onus on the TC to obtain them.

SVG Members agreed that CP1480 v1.0 would actually be worse than the current arrangements for the reasons given above. They advised that they were not minded to approve the CP with its original solution, but would be prepared to consider approving it with the solution change to use Category A signatories as a backstop.

## ISG's initial views

CP1480 was presented to the ISG at its meetings on 13 December 2016 ([ISG188/06](#)), 21 February 2017 ([ISG191/04](#)) and 28 March 2017 ([ISG192](#)). Several ISG Members recognised the issue with the current situation, but had concerns that the proposed solution may not achieve the desired outcome in practice.

Following responses to the CP1480 v1.0 Consultation, the ISG requested that ELEXON provide further information on certain areas as detailed in the table below:

Information requested at ISG191	
ISG question	ELEXON's response
Can ELEXON clarify the timescales on how long an Authorised Person has to respond to an issue (i.e. confirmation that a 24/7 Party contact is not required for corrections to BOA Related Data, contrary to the suggestion of a consultation respondent)?	We advise that an Authorised Person has a minimum of 3 WDs in accordance with BSCP18 to give consent to a correction and so the process does not require a contact outside of normal working hours.
Can ELEXON investigate the possibility of an Authorised Person using a generic mailbox to decrease the reliance on a single person to address/resolve any issues?	We note that an Authorised Person is not able to use a generic mailbox under BSCP38. <sup>3</sup> However, BSCP38 does allow Parties to nominate more than one person to be an Authorised Signatory in any particular category. Therefore Parties could achieve the same effect by registering multiple Category "E" Authorised Persons.

<sup>3</sup> Because BSCP38 requires Authorised Persons to be named individuals with unique passwords and contact details.

Information requested at ISG191	
ISG question	ELEXON's response
Can the ELEXON Portal allow all categories of Authorised Signatories to be managed online, so Parties can dynamically maintain their set of Authorised Persons, instead of the current paper-based system?	We believe that the use of the ELEXON Portal to manage Authorised Signatories can be done outside of this CP as a potential service improvement. However we note that it would be beneficial to progress a CP in relation to BSCP38 to clarify that changes to Authorised Persons can be made online.

Following ELEXON's response to the ISG's request for further information and the views expressed at SVG193, the ISG agreed that the solution should be amended. This is that the TC can contact a Category A Authorised Person when there is no Category E Authorised Person available. The ISG therefore agreed that CP1480 should be issued for a second CP Consultation.

## 6 Industry Views

This section summarises the responses received to the CP1480 v1.0 and CP1480 v2.0 Consultations. You can find the full responses in Attachments C and D.

Two responses were received to the CP1480 v1.0 Consultation and two responses were received to the CP1480 v2.0 Consultation:

- One respondent ('big six' Supplier) provided a response to both Consultations;
- The other respondent to CP1480 v1.0 was a new entrant to the market; and
- The other respondent to CP1480 v2.0 was the Proposer of the CP.

Summary of Responses to CP1480 v1.0 and CP1480 v2.0 CP Consultations		
Question	CP1480 v1.0	CP1480 v2.0
Do you agree with the CP1480 proposed solution?	Yes – 1 No – 1*	Yes – 1 No – 1*
Do you agree that the draft redlining delivers the intent of CP1480?	Yes – 1 No – 1*	Yes – 2* No – 0
Will CP1480 impact your organisation?	Yes – 1* No – 1	Yes – 2* No – 0
Will your organisation incur any costs in implementing CP1480?	Yes – 1* No – 1	Yes – 1* No – 1
Do you agree with the proposed implementation approach for CP1480?	Yes – 1 No – 1*	Yes – 1 No – 1*
Do you believe there are any potential alternative solutions (e.g. those discussed by the ISG and SVG as detailed in Section 5 of the Consultation Paper) that would provide a better solution than the one proposed by CP1480?	Yes – 1 No – 1	N/A
Do you believe that it is necessary or desirable to restrict who can authorise corrections to BOA Related Data?	Yes – 1 No – 1	N/A
Do you agree that the revised timescale is reasonable for Parties to resolve BOA Related Data errors noting that Category "A" Authorised Persons can also be used as an escalation point?	N/A	Yes – 2 No – 0
Do you have any further comments on CP1480?	Yes – 0 No – 2	Yes – 1 No – 1

\* Same respondent

### Comments on the CP

One respondent agreed with the proposed solution and one disagreed for both CP1480 v1.0 and CP1480 v2.0. The one respondent who agreed with the CP1480 v1.0 solution commented that although they were not convinced that the solution would fully rectify the

SVG197/03

CP1480  
CP Assessment Report

26 June 2017

Version 1.0

Page 11 of 16

© ELEXON Limited 2017

issue, they noted that it would be an improvement. The respondent who agreed with the CP1480 v2.0 solution was the Proposer of the CP. They emphasised that having a clearly defined process with specific individuals who have authorisation to provide consent to BOA data corrections, will enable the TC to speed up the process. In addition, it will reduce the chance of Settlement disputes being raised by Trading Parties when a data error has occurred.

The respondent who disagreed with both CP1480 solution options provided a similar response to both CP Consultations. The respondent commented that both CP1480 v1.0 and CP1480 v2.0 propose the same overly bureaucratic process although CP1480 v2.0 has the addition of increasing responsibility in a different category of Authorised Persons. Following their response to CP1480 v1.0, they reiterated as part of their response to CP1480 v2.0 that they felt it inappropriate to include the broad range of Category A Authorised Persons in operational matters. The respondent also highlighted that the initial view from the SVG still describes less onerous alternatives.

Additionally, the respondent noted that although the CP Consultation suggests that there are minimal incidents per month, its Settlement team are regularly involved in providing corrections and respond within appropriate timescales. Furthermore, although for some participants Category A Authorised Persons may be in positions to assist this class of query, in their case, all Category A Authorised Persons are typically senior managers. They therefore believed that this would be an inappropriate query for them to answer as they are unlikely to have any role in the correction of this operational data. This could therefore lead to delays and potential errors.

We highlighted that we do not see any reason why the TC will skip contacting Category E Authorised Persons. Additionally, the BSCP18 draft redlined text requires Category E Authorised Persons to be contacted first. We understand the concern that senior managers do not necessarily want to get involved in these types of matters. However, this will only occur if Category E Authorised Persons are unavailable. If this does occur or starts to occur regularly, this would be an internal issue that Parties would need to resolve by nominating more appropriate Category E contacts.

### **Additional consultation questions**

As part of the CP1480 v1.0 CP Consultation, we asked participants whether it is necessary or desirable to restrict who can authorise corrections to BOA Related Data. One respondent agreed that it was necessary to add restrictions commenting that they believed the process can only be maintained in combination with strict authorisation. The other respondent disagreed noting that additional controls are not necessary. In addition, this respondent agreed with ELEXON that there is no need to restrict consent for BOA Related Data corrections to any particular single individual(s).

Additionally, we asked whether participants believed that there are any potential alternative solutions that would provide a better solution than CP1480 v1.0. One consultation respondent commented that they did not believe that any alternatives suggested by the Panel Committees would be better. However, they noted that, as a new entrant, they have no direct operational experience of the issue. The other consultation respondent suggested that a solution not requiring a formal authorised person, or a process outside of the BSC arrangements such as the TC creating its own contact list outside the BSC, would be preferable.

As part of the CP1480 v2.0 Consultation, the ISG requested that participants were asked whether they agreed that the revised timescale (8WD before SF) is reasonable for Parties to resolve BOA Related Data errors noting that Category "A" Authorised Persons can also be used as an escalation point. Both respondents agreed with the revised timescale with one commenting that this was not a matter of concern.

## Comments on the proposed redlining

In response to CP1480 v1.0, one respondent agreed with the proposed redlining and one disagreed. The respondent who disagreed was concerned over whether a single point of contact would be sufficient. Additionally the respondent queried whether it would be necessary to provide sufficient Category E nominations to cover the full operational issue given that BOAs are a 24-hour operational issue. Furthermore the respondent was concerned that the changes create an additional unnecessary level of complication in the event of maintaining this point of contact for planned or unplanned absences. ELEXON noted the respondents' view and this prompted discussion on whether one person needed to be a contact 24/7. We clarified that a 24/7 contact was not needed and additionally, it did not have to be a single point of contact. The ISG's discussion on this concern can be found in section 5.

This respondent who disagreed with the CP1480 v1.0 draft redlined text also provided a response to the draft redlined text for CP1480 v2.0. Although they do not agree with the CP1480 v2.0 proposed solution, they agreed that the draft redlining would deliver the intent of the change. The other respondent, who is the Proposer of the CP, was of the view that the explicit consent form for Category E Authorised Persons is unnecessary as this authorisation will exist only to be contacted by the TC for corrections to BOA Related Data. ELEXON advised that although Parties may consider this form to be arduous, it is required for data protection purposes.

## Proposer's view

Following the second CP Consultation, we updated the Proposer on the limitations of CP1480 v2.0. We asked for their views but as of yet have not received a response. We will provide a verbal update to the SVG at its meeting if we receive any information in the interim.

## ELEXON's recommendation

We note that we only received three responses from Industry following two separate CP Consultations. Of the three respondents, only one who uses the process is in favour of the CP (the Proposer). From these responses, we have no evidence that this is a material issue for Parties. Furthermore, we have identified that we are unable to fully address the defect that the TC is trying to resolve under the BSC. Taking this and our legal team's view (as detailed in section 2 of the paper) into consideration, we are recommending that this CP is rejected.

---

SVG197/03

CP1480  
CP Assessment Report

---

26 June 2017

---

Version 1.0

---

Page 13 of 16

---

© ELEXON Limited 2017

## 7 Recommendations

We invite you to:

- **REJECT** CP1480; and
- **NOTE** that CP1480 will also be presented to the ISG on 25 July 2017 for decision.

## Appendix 1: Glossary & References

### Acronyms

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

Acronyms	
Acronym	Definition
BM	Balancing Mechanism
BOA	Bid-Offer Acceptance
BSC	Balancing and Settlement Code
BSCP	Balancing and Settlement Code Procedure ( <i>Code Subsidiary Document</i> )
CP	Change Proposal
CPC	Change Proposal Circular
CRA	Central Registration Agent
DPA	Data Protection Act ( <i>UK Legislation</i> )
ISG	Imbalance Settlement Group ( <i>Panel Committee</i> )
SAA	Settlement Administration Agent
SF	Initial Settlement Run
SVG	Supplier Volume Allocation Group ( <i>Panel Committee</i> )
TC	Transmission Company
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
2	BSCPs page on the ELEXON website	<a href="https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/">https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/</a>
2	BSC sections page on the ELEXON website	<a href="https://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/">https://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/</a>
3	CP1480 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1480/">https://www.elexon.co.uk/change-proposal/cp1480/</a>
3	ELEXON Portal website	<a href="https://www.elexonportal.co.uk/news/latest">https://www.elexonportal.co.uk/news/latest</a>
4	Data Protection Act 1998 on the UK Government website	<a href="http://www.legislation.gov.uk/ukpga/1998/29/contents">http://www.legislation.gov.uk/ukpga/1998/29/contents</a>
4	Guide to data protection on the Information Commissioner's Office website	<a href="https://ico.org.uk/for-organisations/guide-to-data-protection/principle-1-fair-and-lawful/">https://ico.org.uk/for-organisations/guide-to-data-protection/principle-1-fair-and-lawful/</a>

---

SVG197/03

---

CP1480  
CP Assessment Report

---

26 June 2017

---

Version 1.0

---

Page 15 of 16

---

© ELEXON Limited 2017



External Links		
Page(s)	Description	URL
7	SVG191 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/svg-191-2/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-191/">https://www.elexon.co.uk/meeting/svg-191-2/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-191/</a>
7	SVG193 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/svg-193/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-193/">https://www.elexon.co.uk/meeting/svg-193/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-193/</a>
7	SVG194 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/svg-194/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-194/">https://www.elexon.co.uk/meeting/svg-194/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-194/</a>
8	ISG188 meeting page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/isg-188/?from_url=https://www.elexon.co.uk/events-calendar-item/isg-188/">https://www.elexon.co.uk/meeting/isg-188/?from_url=https://www.elexon.co.uk/events-calendar-item/isg-188/</a>
8	ISG191 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/isg191/?from_url=https://www.elexon.co.uk/events-calendar-item/isg-190/">https://www.elexon.co.uk/meeting/isg191/?from_url=https://www.elexon.co.uk/events-calendar-item/isg-190/</a>
8	ISG192 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/isg-192/?from_url=https://www.elexon.co.uk/events-calendar-item/isg-191/">https://www.elexon.co.uk/meeting/isg-192/?from_url=https://www.elexon.co.uk/events-calendar-item/isg-191/</a>

SVG197/03

CP1480

CP Assessment Report

26 June 2017

Version 1.0

Page 16 of 16

© ELEXON Limited 2017