

CP Progression Paper

CP1494 - 'Introduction of an objection window for Housekeeping Change Proposals'

ELEXON



Committee

Imbalance Settlement Group

Supplier Volume Allocation Group



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About This Document

This document provides information on new Change Proposal (CP) CP1494 and outlines our proposed progression timetable for this change, including when it will be issued for CP Consultation in the next suitable Change Proposal Circular (CPC) batch.

We are presenting this paper to capture any comments or questions from the Imbalance Settlement Group (ISG) and Supplier Volume Allocation Group (SVG) Members before we issue it for consultation.

There are three parts to this document:

- This is the main document. It provides a summary of the solution, impacts, anticipated costs, and proposed implementation approach, as well as our proposed progression approach for this CP.
- Attachment A contains the CP1494 proposal form.
- Attachment B contains the proposed redlined changes to deliver the CP1494 solution.

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Background

The evolution of the current rules for 'housekeeping' changes

In 2005, [CP1073 'Introduction of a Housekeeping Process into BSCP40'](#) first introduced the concepts of Housekeeping CPs and Housekeeping Changes into [Balancing and Settlement Code Procedure \(BSCP\) 40 'Change Management'](#). It argued that, for efficiency, CPs containing only 'housekeeping' changes (such as correcting typographical errors) should not be subject to the full CP process. It therefore introduced the rules that:

- Housekeeping CPs do not undergo industry Impact Assessment before they are approved; and
- the relevant Panel Committee¹ decides whether a CP should be progressed as a Housekeeping CP.

In 2007, [CP1170 'Improving the BSC Change Process'](#) (which made other, wider changes to the CP process in BSCP40) removed the original CP1073 requirement that Housekeeping CP redlining should undergo industry review after approval of the Housekeeping CP. It did not otherwise change the CP1073 definitions of a Housekeeping CP or a Housekeeping Change, which are today defined in BSCP40 as follows:

- 'Housekeeping' CP – a Change Proposal which, if approved, would result in a Housekeeping Change to one or more Configurable Items in the Baseline Statement². Housekeeping CPs will be published on the BSC Website and require Committee approval.'
- 'Housekeeping' Change – involves the correction of manifest errors, minor errors and inconsistencies, including typographical errors (e.g. punctuation errors, spelling mistakes, incorrect font, incorrect capitalisation) incorrect cross-referencing, and the removal of redundant text.'

In 2013, Balancing and Settlement Code (BSC) Modification [P296 'Introduction of a 'Fast Track' Modification Process following the outcomes of the Code Governance Review \(Phase 2\)'](#) introduced changes to the process for 'housekeeping' Modification Proposals.

Before P296, any minor 'housekeeping' changes to the BSC had to follow the same progression rules as any other Modification Proposal. P296 introduced the ability for the Panel to approve 'housekeeping' changes to the BSC, without industry consultation, through a Fast Track Self-Governance Modification Proposal.³

What is a Housekeeping Change?

[Balancing and Settlement Code Procedure \(BSCP\) 40 'Change Management'](#) section 2.2 defines a Housekeeping Change as: "*the correction of manifest errors, minor errors and inconsistencies, including typographical errors (e.g. punctuation errors, spelling mistakes, incorrect font, incorrect capitalisation) incorrect cross-referencing, and the removal of redundant text*".

¹ The relevant Panel Committee will decide whether a CP should be progressed as a Housekeeping CP'.

² The Baseline Statement lists each Configurable Items under BSCP40 change management along with its responsible Committee(s).

³ Defined in [Annex X-1](#) of the BSC as a Modification Proposal which:

- meets the BSC's Self-Governance Criteria;
- rectifies manifest errors or corrects minor inconsistencies in, or makes other minor consequential changes to, the BSC; and
- is required to correct an error in the BSC or as a result of a factual change, including but not limited to:
 - updating names or addresses;
 - correcting minor typographical errors;
 - correcting formatting and consistency errors, such as paragraph numbering; or
 - updating out of date references to other documents or paragraphs.

P296 also introduced a 15 Working Day (WD) objection window for Fast Track Self-Governance Modification Proposals, starting from the date that ELEXON notifies Parties of the Panel's approval. During this window, Parties can object to the Panel's approval on the basis that the Modification Proposal does not satisfy the Fast Track Self-Governance Criteria. Where an objection is received, the Panel must then put the Modification Proposal through the normal progression process including an industry consultation. Because of the objection process, P296 specified that the proposed Implementation Date for a Fast Track Self-Governance Modification Proposal must not be earlier than 16 WDs after the date that ELEXON provides notification of the Panel's approval.

The rules for Fast Track Self-Governance Modification Proposals are set out in [BSC Section F paragraph 7](#).

What is the issue?

Currently, Parties have the ability to object to Modification 'housekeeping' changes only and not Housekeeping CPs. This creates inconsistent governance principles between the Modification and CP processes. ELEXON is seeking to introduce an equivalent 15 WD objection window into the Housekeeping CP process in BSCP40.

ELEXON still believes that an industry consultation is not needed for Housekeeping CPs. However, we are seeking to introduce an objection window into the process.

2 Solution

Proposed solution

We propose to amend BSCP40 (sections 3.4 and 3.5) to introduce a 15 WD objection window for Housekeeping CPs.

Our proposed objection process is broadly in line with the Fast Track Self-Governance Modification Proposals process. In particular:

- The objection window will be 15 WDs from the date that ELEXON notifies participants of the relevant Panel Committee's approval of the Housekeeping CP;
- BSC Change Administrators (BCAs) and Party Agent Change Administrators (PACAs) may only object to a Housekeeping CP on the basis that it does not satisfy BSCP40's definition of a Housekeeping Change. PACAs do not have the power to raise a change however, as they are included in the Impact Assessment we believe they should have the power to object.
- Because of the objection window, the Implementation Date for a Housekeeping CP shall not be earlier than 16 WDs after the date that ELEXON notifies participants of the Panel Committee's decision;
- If no objections are received, the Housekeeping CP will be implemented as planned; and
- If an objection is received, ELEXON will progress the CP through the normal non-Housekeeping process – going through the CP Consultation and then Panel Committee decision processes as a non-Housekeeping CP.

Attachment B contains the proposed redlined changes to BSCP40.

Proposer's rationale

We believe that it is 'good governance' to include such an objection window under the Housekeeping process for CPs as it ensures the industry has the opportunity to challenge whether changes should be classed as Housekeeping, something at present they cannot do.

We also believe that it is pragmatic to better align the CP and Modification processes for Housekeeping/Fast Track Self-Governance changes. This ensures consistency within our change processes as well as the governance of these processes.

Proposed redlining

Attachment B contains the proposed changes to BSCP40 to deliver CP1494.

The attached redlining has been done against BSCP40 version 15.0.

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3 Impacts and Costs

Central impacts and costs

Central impacts

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP40	<ul style="list-style-type: none">N/A

Central costs

The implementation costs for CP1494 are approximately £240 (one ELEXON working day of effort) to make the required document changes.

BSC Party & Party Agent impacts and costs

We do not anticipate any direct impacts on BSC Parties or Party Agents and seek confirmation of this in the consultation.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
N/A	N/A

4 Implementation Approach

Recommended Implementation Date

ELEXON suggests that the solution to CP1494 be delivered on 22 February 2018 as part of the February 2018 BSC Release. This is the next available Release that can include this CP.

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5 Proposed Progression

Progression timetable

The table below outlines the proposed progression plan for CP1494:

Progression Timetable	
Event	Date
CP Progression Paper presented to ISG for information	26 September 2017
CP Progression Paper presented to SVG for information	03 October 2017
CP Consultation	09 October 2017 – 03 November 2017
CP Assessment Report presented to ISG for decision	28 November 2017
CP Assessment Report presented to SVG for decision	05 December 2017
Proposed Implementation Date	22 February 2018 (February 2018 Release)

CP Consultation questions

We intend to ask the standard CP Consultation questions for CP1494, we do not believe any additional questions need to be asked for this CP.

Standard CP Consultation Questions
Do you agree with the CP1494 proposed solution?
Do you agree that the draft redlining delivers the CP1494 proposed solution?
Will CP1494 impact your organisation?
Will your organisation incur any costs in implementing CP1494?
Do you agree with the proposed implementation approach for CP1494?

6 Recommendations

We invite you to:

- **NOTE** that CP1494 has been raised;
- **NOTE** the proposed progression timetable for CP1494;
- **NOTE** that CP1494 will also be presented to the SVG for information at its meeting on 3 October 2017; and
- **PROVIDE** any comments or additional questions for inclusion in the CP Consultation.

Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BCAs	BSC Change Administrators
BSC	Balancing and Settlement Code
BSCP	Balancing and Settlement Code Procedure
CP	Change Proposal
CPC	Change Proposal Circular
ISG	Imbalance Settlement Group
PACA	Party Agent Change Administrators
SVG	Supplier Volume Allocation Group
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	BSCP40 'Change Management'.	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/?show=all
2	CP1073 'Introduction of a Housekeeping Process into BSCP40'.	https://www.elexon.co.uk/change-proposal/cp1073-introduction-of-a-housekeeping-process-into-bscp40/
2	CP1107 'Timescale change to the 100kW notification from NHHDC'	https://www.elexon.co.uk/change-proposal/cp1107-timescale-change-to-the-100kw-notification-from-nhhdc/
2	P296 'Introduction of a 'Fast Track' Modification Process following the outcomes of the Code Governance Review (Phase 2)'.	https://www.elexon.co.uk/mod-proposal/p296/
3	BSC Section F 'Modification Procedure'.	https://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/

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