

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

P377 'Amending Gate Closure references in Market Index Data to include trades up to the Submission Deadline in the Market Index Data Calculations'

This Modification proposes to include data up to the Submission Deadline, instead of Gate Closure, in the Market Index Data calculations by replacing references to 'Gate Closure' with 'Submission Deadline'.



The BSC Panel recommends **approval** of P377

This Modification is expected to impact:

- ELEXON
- BSC Trading Parties
- Market Index Data Providers (MIDPs)
- Market Participants who use the Market Index Definition Statement

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Contact**Danielle Pettitt**

020 7380 4314

Danielle.Pettitt@elexon.co.uk



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About This Document

This is the P377 Final Modification Report, which ELEXON has submitted to the Authority on behalf of the BSC Panel. It includes a summary of the Panel's Report Phase Consultation. The Authority will consider this report and will decide whether to approve or reject P377.

There are four parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits/drawbacks and proposed implementation approach.
- Attachment A contains the approved Proposal Form for P377.
- Attachment B contains the approved redlined changes to the Market Index Definition Statement (MIDS) to deliver P377.
- Attachment C contains the approved redlined changes to BSC Section T for P377.

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Why Change?

[BSC Section T 1.5.3\(b\)](#) (iii) defines 'short term' in relation to Market Index Data (MID) as a time period in reference to Gate Closure. Following Balancing and Settlement Code (BSC) Modification [P342](#) implemented in November 2017, the deadline for contracts for delivery in a Settlement Period has moved from Gate Closure to the Submission Deadline. P342 did not change the [Market Index Definition Statement](#) (MIDS) to reflect this. This means that MID is excluding trades following Gate Closure up to the Submission Deadline, meaning that the MID is not as reflective as it could be of wholesale electricity in Great Britain.

Solution

This Modification is being used as the vehicle to deliver the recommendation from the [2018 MIDS Review](#). The 2018 MIDS Review concluded and this Modification proposes that:

- The Market Index Data Providers (MIDPs) include trades made post-Gate Closure and prior to the Submission Deadline; and
- Timeband 6 weighting is changed from '1' to '0'.

Impacts & Costs

P377 will impact BSC Trading Parties who are exposed to Imbalance Volume. P377 will also impact MIDPs. There are two MIDPs, Nord Pool and EPEX SPOT. Nord Pool have confirmed that they will not charge for the change. EPEX SPOT have said that they will charge a one-off cost of approximately £28,000.

Implementation

P377 is proposed for implementation on 29 March 2019 as part of an ad-hoc BSC Release, if an Ofgem decision is received by 22 February 2019. Or 5 weeks after Ofgem approval if an Ofgem decision is received after 22 February 2019. EPEX SPOT have confirmed they require a 5 week lead time to implement these changes. Nord Pool has confirmed that they are also able to deliver within 5 weeks.

Recommendation

The Panel unanimously believed that P377 would better facilitate BSC Objective (d) and so should be **approved**. It also unanimously agreed that P377 should **not** be progressed as a Self-Governance Modification Proposal. The Panel sent P377 directly to the Report Phase [at its meeting on 13 December 2018](#).

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What is the issue?

Currently, the MID is excluding trades following Gate Closure up to the Submission Deadline, meaning that the MID is not as reflective as it could be of wholesale electricity in Great Britain.

BSC Modification P342 '[Change to Gate Closure for Energy Contract Volume Notifications](#)' implemented in November 2017, changed the deadline for the submission of Energy Contract Volume Notifications (ECVNs), for each Settlement Period, from Gate Closure to the Submission Deadline. P342 did not change the Market Index Definition Statement (MIDS) to reflect this as the Workgroup wanted to wait and see if the volume of trades warranted amending the MIDS. The outcome of the [2018 MIDS Review](#) is that the volume of trades occurring past Gate Closure is now significant enough that the calculation of the MID should include trades up to the Submission Deadline, instead of Gate Closure.

Timeband 6 has contributed little volume to Market Index Data. The removal of the weighting of Timeband 6 would aid principle 4.2(f) in the MIDS, by allowing trades as close as possible to the Submission Deadline as it does not contain a significant volume.

Amending the MIDS provides the opportunity to make minor housekeeping changes at this time as well.

Background

What is Gate Closure?

Gate Closure is the point of time one hour prior to a Settlement Period by which Physical Notifications (PNs) relating to that Settlement Period must be submitted. This deadline is the point by which Trading Parties, mainly generators, must notify their Final Physical Notifications (FPNs) and Bids and Offers for that Settlement Period to National Grid, acting as the Electricity System Operator (ESO).

P342 '[Change to Gate Closure for Energy Contract Volume Notifications](#)'

[P342](#) introduced a new deadline for the purpose of submitting Energy Contract Volume Notifications (ECVNs) and Metered Volume Reallocation Notifications (MRVNs) for each Settlement Period. The new contract notification deadline was decoupled from Gate Closure, and was set to the Submission Deadline instead. The Submission Deadline for any Settlement Period is the time at the start of that Settlement Period.

The Workgroup considered if the submission of Market Index Data should also be moved to the Submission Deadline or remain at Gate Closure. It was noted at the time (2016) that the volumes expected to be traded after Gate Closure but before the Submission Deadline would, to begin with, be low enough not to materially influence the Imbalance Price calculation. However, the Workgroup did note that once sufficient data was available on the volumes and prices of trades carried out between Gate Closure and the Submission Deadline, a determination of the most appropriate deadline could be included in the Market Index Definition Statement (MIDS) review in August 2018.

What are Physical Notifications?

Physical Notifications (PNs) are a notification made by a Party for its BM Unit and a Settlement Period to the ESO as to the expected level of Export or Import, as at the Transmission System Boundary, in the absence of any Balancing Mechanism Acceptances. The Final Physical Notification is the final level of import or export that a Party expects to import and export for its BM Unit for a Settlement Period at Gate Closure.

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What is the Market Index Definition Statement?

MID is used in Settlement to calculate a Market Price, expressed in £/MWh in respect of each Settlement Period. The calculation of Energy Imbalance Prices uses the Market Price in two defaulting scenarios. When the Net Imbalance Volume (NIV) is zero, then the Energy Imbalance Price will default to the Market Price. Alternatively, if all of the actions in the price stack are unpriced, then the Replacement Price will be set by the Market Price and the Energy Imbalance Price will consequently be set by the Market Price. It is designed to reflect the price of wholesale electricity in Great Britain in the short-term market. The Market Price is derived from trades made on power exchanges. Short term is currently defined as period of hours or days immediately prior to Gate Closure, but in any event no more than three Business Days prior to Gate Closure.

ELEXON reviews the MIDS annually on behalf of the BSC Panel, in accordance with [BSC Section T1.5.4](#). ELEXON conducted [its 2018 MIDS review](#) in October 2018. In this review, the analysis covers the period 1 August 2017 to 31 July 2018. The review is undertaken to ensure that parameters used in the MIDS calculations (i.e. the Individual Liquidity Threshold (ILT), Timeband weightings and product weightings) remain fit for purpose and through the parameters, checking the MIDS principles (BSC Section T1.5.3) are being met.

In particular, the MIDS defines:

- The overall price (Market Index Price) and volume (Market Index Volume) calculation process;
- A volume threshold (Individual Liquidity Threshold);
- A list of power exchange products that are included in the calculation;
- A list of Timebands, which group trades according to how long before Gate Closure they are made;
- Weightings which reflect the importance of the products and Timebands; and
- Principles by which the weightings, products and thresholds are determined.

The two main parameters that the MIDS define are:

Individual Liquidity Threshold:

- A volume threshold that is set to apply default rules when there is insufficient trading on the power exchange to provide a suitable price. The aim is to avoid the price being set by a single trade – i.e. not having the ILT too low – but also to minimise the number of Settlement Periods where the default rule is applied – not having the ILT too high.

Time and Product Weightings:

- Weightings are applied to reflect the importance of each product and Timeband and are set to '1' or '0', which either completely includes or excludes particular trades.

Timebands

Trades are classified by a number of Timebands, which determine how long before Gate Closure the trade was made. These Timebands cover a number of Settlement Periods. Timebands 1-6 are currently used to calculate the MID. Timeband 6 begins 12 hours ahead of Gate Closure, and ends 8 hours before Gate Closure. Timeband 1 is the final hour up to Gate Closure, as shown in the diagram below.



Amendments to the MIDS

[BSCP40 'Change Management'](#) details (in section 3.10) the process for reviewing and amending the MIDS. Changes to the MIDS must be approved by Ofgem (the Authority). This Modification Proposal is being used as the vehicle to recommend to the Panel and Ofgem the proposed changes following the 2018 MIDS Review and for Ofgem to approve the changes.

Approved solution

The [2018 MIDS Review](#) concluded that the MIDPs should include trades made post-Gate Closure and prior to the Submission Deadline. The 2018 MIDS Review recommended amending Timeband 6 weighting from '1' to '0' if changes are made between Gate Closure and Submission Deadline.

Amend BSC Section T 1.5.3(b) (iii)

BSC Section T 1.5.3(b) (iii) defines 'short term' in relation to Market Index Data as a time period in reference to Gate Closure. The proposed solution would replace the reference to 'Gate Closure' with the 'Submission Deadline'.

Amend the MIDS to refer to the Submission Deadline instead of Gate Closure

Update relevant references in the MIDS from 'Gate Closure' to refer to the 'Submission Deadline' instead.

Amend the MIDS to remove Timeband 6 as a weighted Timeband

Set the Timeband 6 from '1' to '0'. Under the proposed Modification this will exclude trades from the Market Index Definition submission made 8-12 hours ahead of the Submission Deadline. Timebands 1-5 (representing 0-8 hours prior to the Submission Deadline) will remain the weighted Timebands.

Amend the MIDS with a number of housekeeping changes

Correcting a number of grammatical and format changes.

Legal text

The agreed changes to the MIDS to deliver P377 can be found in Attachment B and the agreed changes to the BSC to deliver P377 can be found in Attachment C.

4 Impacts & Costs

Estimated central implementation costs of P377

The estimated central implementation costs for P377 are approximately £28,000. These comprise of:

- approximately £28,000 for EPEX SPOT to amend its systems to include trades post-Gate Closure in the MID;
- approximately £360 for ELEXON to implement the impacted documents.

No on-going costs have been identified or are expected as a result of the P377 solution.

Indicative industry costs of P377

No industry costs have been identified or are expected in order to implement the P377 solution.

P377 impacts

Impact on BSC Parties and Party Agents

Party/Party Agent	Impact
None	

Impact on Transmission Company

None	
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Impact on BSCCo

Area of ELEXON	Impact
Configuration Management	Implement the changes to the BSC and MIDS

Impact on BSC Systems and process

BSC System/Process	Impact
None	

Impact on BSC Agent/service provider contractual arrangements

BSC Agent/service provider contract	Impact
Nord Pool	System changes are required – no associated costs
EPEX SPOT	System changes are required – approximately £28,000 to amend its systems with a 5 week lead time

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Impact on Code	
Code Section	Impact
Section T 'Settlement and Trading'	Changing Section T 1.5.3(b)(iii) definition of short term.

Impact on other Configurable Items	
Configurable Item	Impact
Market Index Definition Statement	Amending references to 'Gate Closure' to 'Submission Deadline' and the removal of Timeband 6 as a weighted Timeband, as well as housekeeping changes.

Impact on Core Industry Documents and other documents	
Document	Impact
Ancillary Services Agreements	None
Connection and Use of System Code	
Data Transfer Services Agreement	
Distribution Code	
Distribution Connection and Use of System Agreement	
Grid Code	
Master Registration Agreement	
Supplemental Agreements	
System Operator-Transmission Owner Code	
Transmission Licence	
Use of Interconnector Agreement	

Impact on Consumers
The day to day operation of Balancing and Settlement would remain unaffected so there would be no direct cost to consumers.

Impact on the Environment
The MIDS provisions being amended will not have any impact on the Environment.

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Impact on a Significant Code Review (SCR) or other significant industry change projects

Ofgem confirmed on 13 December 2018 that, as at that time, P377 was not in the scope of the three open SCR's, and should be considered exempt.

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Recommended Implementation Date

- **29 March 2019** if the Authority's decision is received on or before **22 February 2019**; or
- **5 weeks** after the Authority's approval if a decision is received after **22 February 2019**.



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 administering the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation

(g) Compliance with the Transmission Losses Principle

The BSC Panel's discussion of P377

A draft P377 Modification Proposal was presented, alongside an Initial Written Assessment for that proposal ([Panel 285/09](#)), to the Panel at its meeting on 13 December 2018. BSCCo recommended the Panel raise the draft Modification Proposal on the basis that it would better facilitate Applicable BSC Objective (d). The Panel agreed and raised P377 in accordance with F2.1.1(d)(i).

P377 Costs

One Member asked why Nord Pool was not charging anything, whilst EPEX SPOT were charging £28,000. The Panel Member was concerned that this was not good value for money. Other Panel Members shared this concern and asked if the cost was justifiable for this change. A Member also queried whether the data provided by the two providers was the same following the introduction of [XBID](#). ELEXON confirmed that the data provided by the two MIDPs was different and that often it is the EPEX Spot data that derives the Market Index Price.

The Panel requested that ELEXON look into why the costs are varied and to bring this out in the Report Phase Consultation. ELEXON asked respondents in the Report Phase Consultation to consider whether the costs associated with the change justify the benefits.

Following the Panel meeting, ELEXON can confirm that the XBID data is not used in the MIDS. Further, the EPEX Spot system changes are more complex and require detailed testing, which is driving the majority of the associated costs. ELEXON raised the issue with EPEX SPOT and provided an update to the Panel at its meeting on 10 January 2019.

Panel's views against the BSC Applicable Objectives

The Panel **unanimously** agreed that P377 would better facilitate BSC Objective (d) as it would have a positive impact on the efficiency of the implementation of the Balancing and Settlement arrangements. It would allow MIDPs to include post-Gate Closure trades in Market Index Data, providing more insight into wholesale trading activity resulting in a more cost reflective MIP.

Panel's views on redlining

The Panel **unanimously** agreed that the draft redlined changes to the BSC and the MIDS for P377 deliver the intention of P377.

Panel's view on the implementation date

The BSC Panel **unanimously** recommended an implementation date of:

- 29 March if the Authority's decision is received on or before 22 February 2019; or
- 5 weeks after the Authority's approval if a decision is received after 22 February 2019.

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Panel views on Self-Governance

The BSC Panel **unanimously** agreed that P377 should **not** be progressed as a Self-Governance Modification as this Modification would alter competition in commercial activities connected with the generation as well as matters relating to the management of the market. As it will include additional trades in the Market Index Data calculations, which may be used in the calculation of Parties' Imbalance Charges. Further any changes to the MIDS are required by BSCP40 to be approved by the Authority.

7 Report Phase Consultation Responses

P377 was submitted for Report Phase Consultation on Monday 17 December 2018, with responses due by 5pm Wednesday 2 January 2019.

The Report Phase Consultation did not receive any responses or questions. The Consultation was active for a standard 10 Working Days, and industry was reminded to respond.

The lack of response was expected as the proposed changes to the MIDS, as described in P377, had previously been subject to a four week industry consultation as part of the MIDS review process and endorsed by the Imbalance Settlement Group (ISG).

The Draft Modification Report (DMR) for P377 was presented to the BSC Panel at its meeting on [10 January 2019 \(Panel 286/05\)](#) to seek their final views on P377. The Panel agreed with all recommendations unanimously as set out in Section 9 of this paper below.

Panel's final discussions on P370

Amendments to the Draft Modification redlining

At the beginning of the presentation it was highlighted and clarified for the Panel that there were a few manifest errors regarding the draft redlining for the MIDS as well as Section T. These were:

- Section 4.4.2 of the MIDS includes a graphical representation of the Timebands which is there for illustrative purposes to aid understanding of Timebands. By changing references in the MIDS from Gate Closure to the Submission Deadline the intention was to update this diagram accordingly but the changes to the diagram were omitted from the Report Phase Consultation. Based on the current redlining in the approved MIDS redlining that was consulted on, the text and the graph in 4.4.2 would be misleading. Due to this ELEXON asked the BSC Panel to approve the new diagram. Attachment B contains the corrected and Panel approved version of the MIDS.
- BSC Section T paragraph 1.5.3 redlining that consulted on by industry was correct. However, the attachment that was presented to the Panel as part of the Draft Modification Report missed out the word 'the' in sub paragraph (iii). Consequently the Panel were asked to approve the redlining that they had previously seen and that was sent out for consultation. Attachment C contains the corrected and Panel approved version of the legal text.
- It was also noted that the recommendations that were included in the slides varied slightly to the recommendations in the Draft Modification Report. It was confirmed that the recommendations on the slides were correct and the P377 DMR was updated to reflect this.

XBID

A Panel member asked for clarification of [XBID](#) and market coupling in Market Index Data when the P377 IWA was presented. ELEXON confirmed to the Panel that the UK was not part of XBID at present and that if intraday market coupling would impact the MIDS in the future, this would be addressed in a future MIDS review.

EPEX SPOT costing

The BSC Panel Chairman asked for clarification that the EPEX SPOT costs had been included in the Report Phase Consultation (RPC). ELEXON confirmed that following the Panel meeting on 13 December 2018 EPEX SPOT had been contacted about their costs and responded with confirmation that their costs were largely driven by the need for additional testing as their system changes were more complex. ELEXON further confirmed that this information was captured in the RPC.

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Panel's final views

The Panel's final views and arguments remained unchanged from their initial views (as described in section six above). The Panel unanimously:

- **AGREED** that the P377 Proposed Modification:
 - **DOES** better facilitate Applicable BSC Objective (d).
- **AGREED** a recommendation that the P377 Proposed Modification should be **approved**;
- **APPROVED** an Implementation Date for the Proposed Modification of:
 - 29 March if an Authority decision is received on or before 22 February 2019; or
 - 5 weeks after Ofgem approval if an Authority decision is received after 22 February 2019.
- **APPROVED** the draft legal text and changes to the MIDS for the Proposed Modification; and
- **APPROVED** the P377 Modification Report.

Please note the approved legal text and MIDS changes included the amendments described above.



What are the Self-Governance criteria?

A proposal that, if implemented:

- a) is unlikely to have a material effect on:
 - i. existing or future electricity consumers; and
 - ii. competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution, or supply of electricity; and
- iii. the operation of the national electricity transmission system; and
- iv. matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and
- v. the Code's governance procedures or modification procedures; and
- b) is unlikely to discriminate between different classes of Parties

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9 Recommendations

The BSC Panel recommends to the Authority:

- That P377 should be **approved**;
- An Implementation Date for P377 of:
 - **29 March 2019** if an Authority decision is received on or before **22 February 2019**; or
 - **5 weeks** after the Authority's approval if a decision is received after **22 February 2019**.
- The BSC legal text for P377;
- The changes to the MIDS.

Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BM	Balancing Mechanism
BSC	Balancing and Settlement
CR	Change Request
DMR	Draft Modification Report
ECVAA	Energy Contract Volume Aggregation Agent
ECVNA	Energy Contract Volume Notification Agent
EPEX	EPEX SPOT
ILT	Individual Liquidity Threshold
ISG	Imbalance Settlement Group
IWA	Initial Written Assessment
MID	Market Index Data
MIDP	Market Index Data Provider
MIDS	Market Index Definition Statement
MVRNs	Metered Volume Reallocation Notifications
N2EX	Nord Pool
PN	Physical Notification
RER	Risk Evaluation Register
RPC	Report Phase Consultation
SAA	Settlement Administration Agent
SCM	Supply Chain Management

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	BSC Section T, Settlement and Trading Charges	https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/

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External Links		
Page(s)	Description	URL
3	Market Index Definition Statement	https://www.elexon.co.uk/consultation/mids-review-2018-consultation/
3	P342 – Change to Gate Closure for Energy Contract Volume Notifications	https://www.elexon.co.uk/mod-proposal/p342/