

Public

**P383 'Enhanced  
reporting of demand data  
to the NETSO to facilitate  
CUSC Modifications  
CMP280 and CMP281'**

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Workgroup meeting 3

29 July 2019  
Danielle Pettitt

**ELEXON**

# Health & Safety

## In case of an emergency

An alarm will sound to alert you. The alarm is tested for fifteen seconds every Wednesday at 9.20am

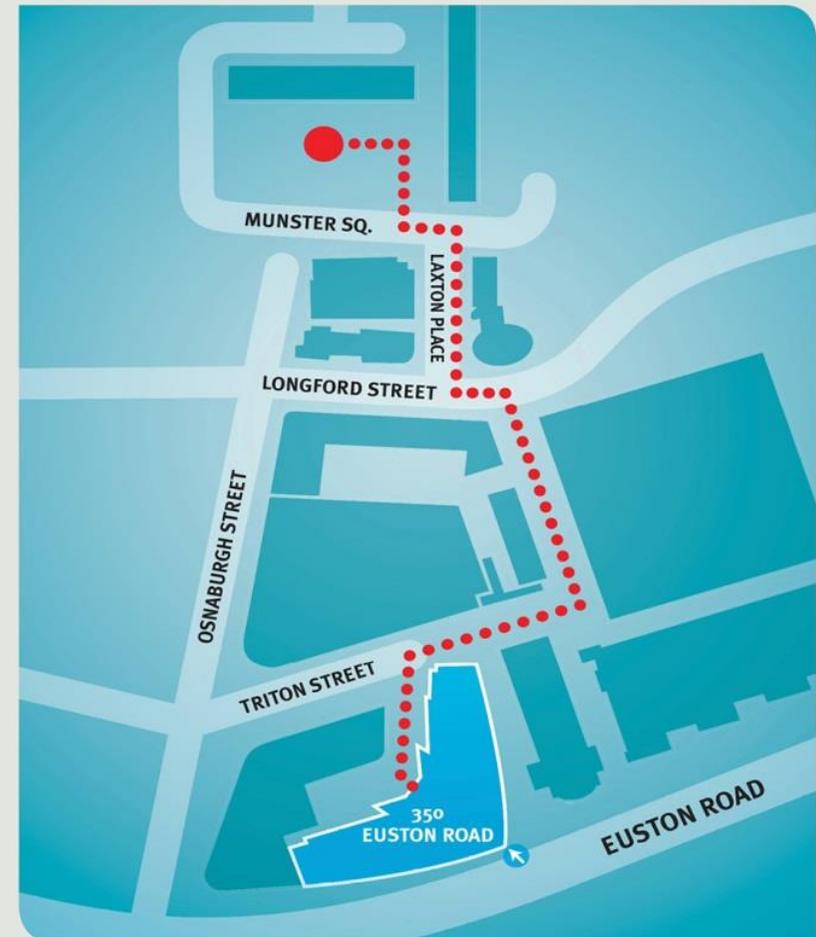
## Evacuating 350 Euston Road

- If you discover a fire, operate one of the fire alarms next to the four emergency exits.
- Please do not tackle a fire yourself.
- If you hear the alarm, please leave the building immediately.
- Evacuate by the nearest signposted fire exit and walk to the assembly point.
- Please remain with a member of ELEXON staff and await further instructions from a Fire Warden.
- For visitors unable to use stairs, a Fire Warden will guide you to a refuge point and let the fire brigade know where you are.

## When evacuating please remember

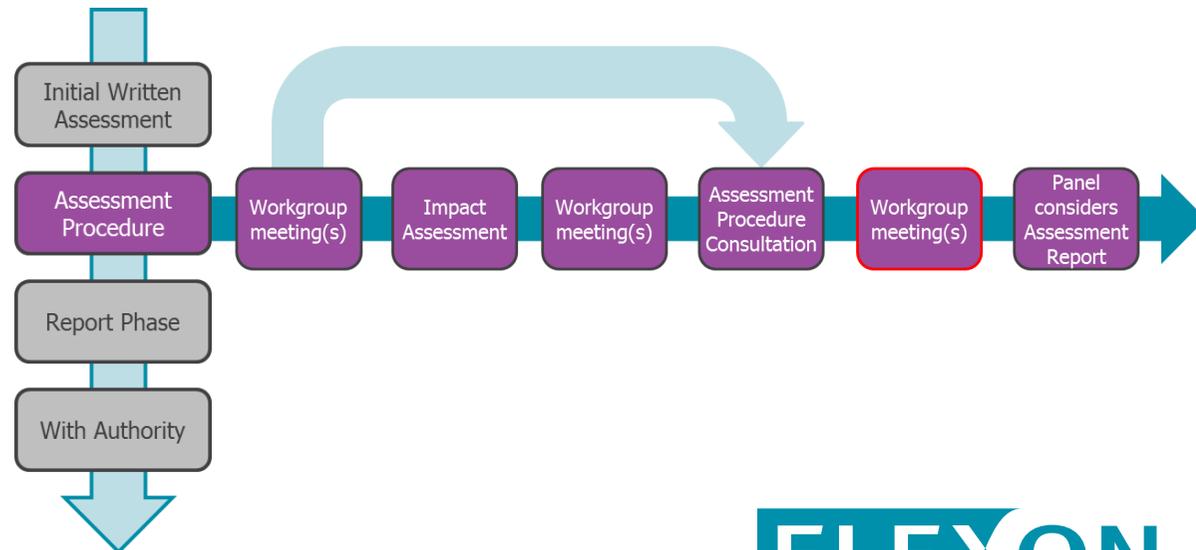
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# Agenda and Meeting Objectives

- Welcome, review of last meeting and meeting objectives
- Review Assessment Consultation responses
- Confirm final solution to progress
  - Any Alternatives?
- Confirm BSC legal text
- P383 Terms of Reference summary
- Confirm final views on Objectives
- Next steps and meeting close



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# Summary of P383 Solution

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- The proposed solution comprises the following overall elements:
  - A declaration process
  - Request for and reporting of declared Storage Facilities' HH Metering Systems metered data
  - Aggregation of declared Storage Facilities' metered volumes and reporting of these volumes to the NETSO
  - Assurance measures – upfront validation, and ongoing monitoring and reporting
- This solution only applies to SVA Storage Facilities, whose Imports and Exports are only measured by SVA HH Metering Systems (not unmetered)
  - CVA Storage Facilities must follow processes set out in the CUSC



# Assessment Consultation Responses

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# Summary of Assessment Procedure Consultation

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## ■ **Two key themes** to come out of the P383 Assessment Procedure Consultation:

### 1. Role of Virtual Lead Parties

- Two respondents said that the draft legal text only refers to Suppliers as the potential registrants for a storage facility operator, and does not take into account the role of Virtual Lead Parties (VLPs)
- VLPs are not subject to TNUOS or BSUOS charges. As such only Suppliers (Lead Party for a Supplier BMU and registrant for associated Metering Systems) have a direct interest in the Storage Facilities' Imports (and Exports) which they are responsible for (per K1.2.2) and will be charged TNUOS and BSUOS on.

### 2. Implications of Ofgem's 'Statutory Consultation on electricity generation licence changes and next steps' – licence condition proposal to publish and provide info on storage facilities

- One respondent noted that 'As this is a licence condition, it would seem appropriate to review the requirements set out in the proposed Modification to ensure that they do not duplicate the process'
- The proposed licence change would introduce additional requirements on licensees to provide and publish information about their storage facilities. We agree that this increases the burden on licensees.
- However, the proposed licence requirements do not entirely mirror those necessary to support CMP280/281 and P383.
- Therefore we believe it is still necessary for Storage Operators and Suppliers to provide the information proposed by P383.

# Q1 – Assessment Consultation Responses

**01** Do you agree that P383 does not meet the Self-Governance Criteria and so should not be progressed as a Self-Governance Modification?

Yes	8
No	0
Neutral	0
Other	0

- **All** respondents agreed P383 should **not** be progressed as Self-Governance
  - “It has a material beneficial effect on competition”
  - “will improve competition in the electricity market and therefore better facilitates BSC Objective (c)”
  - “will have a material and beneficial impact on competition in the generation of electricity for storage operators participating with other generators; will also be of benefit to matters relating to sustainable development & operation of the national transmission system. Therefore, it should not be treated as a Self-Governance Modification as it materially impacts Self-Governance criterion (ii), (iii) and (iv).”
  - “As this modification has a direct link to the charges payable by generator users, and supports two CUSC modifications which have a material effect on competition, it is appropriate to consider the Authority to make a determination on implementation.”

## Q2 – Assessment Consultation Responses

02

Do you agree with the Workgroup that the draft legal text delivers the intention of P383?

Yes	6
No	2
Neutral	0
Other	0

- **Five** respondents all **in favor** with no rationale provided
- **Two** respondents voted **not in favor**, both conclude that the draft legal text fails to take into account the role of Virtual Lead Parties (VLPs)

## Q3 – Assessment Consultation Responses

03

Do you agree that the draft redlined changes to BSCP508 and BSCP503, deliver the intention of P383?

Yes	5
No	2
Neutral	0
Other	1

- **Four** voted in **favour** with no rationale provided
- **One** voted for **partial**
  - they had a question regarding BSCP508 which they followed up with in Question 15
- **Two** voted **against**
  - Both believe that Virtual Lead Parties should be included in the redlining

## Q4 – Assessment Consultation Responses

04

Do you agree with the Workgroup that there are no potential Alternative Modifications within the scope of P383 which would better facilitate the Applicable BSC Objectives?

Yes	6
No	0
Neutral	1
Other	0

- **Six** voted in **favour**, five with no rationale provided
  - A BSC Party commented “Whilst the Storage submission could go directly to the BSC Co, this would then be reported to the supplier as such this alternative is not an improvement of the proposed approach.”
  - NG ESO commented “As the issue being resolved is the facilitation of two other code modifications, there are no other options which could reasonably be said to be in scope of this P383”
- **One** gave **no comment** and provided no rationale

## Q5 – Assessment Consultation Responses

05 Will the implementation of P383 impact your organisation?

Yes	6
No	2
Neutral	0
Other	0

- The **majority** of respondents said there would be **minimal** impact to their organisation
  - A Party Agent said the P383 impact will be minor code adjustment to HHDA system to be able to differentiate between instructions sent to it by its Supplier and those sent by SVAA.
  - It will be important to acknowledge the File Sequence Number and Instruction Number included in two D0354 data flows may be the same, except that one is sent by a Supplier and the other by the SVAA. However, both must be actioned as independent instructions.
- A Supplier commented:
  - As the proposed solution builds upon the measures for reporting data for the calculation of Capacity Market (CM) and Contracts for Difference (CfD) charges, this would have minimal impact as it will be built upon into our existing processes.
  - They requested that P383 monthly reporting timelines are tied up as far as possible with existing reporting and submission timelines.

## Q5 – Assessment Consultation Responses (1/2)

**05** Will the implementation of P383 impact your organisation?

Yes	6
No	2
Neutral	0
Other	0

- **NG ESO** highlighted that they would need to change:
  - The system which receives data from SVAA;
  - The 'gateway' which passes it through to our billing system;
  - Their billing system to ensure that new logic applies the relevant tariffs to the relevant volumes;
  - The process by which they use extant settlement data to forecast future chargeable demand for the purpose of tariff-setting.
- They also said that there would be other significant changes for NETSO in relation to the creation and forecasting of new tariffs/charging exemptions for storage but these are driven primarily by CMPs 280 and 281 rather than being innate to P383.

## Q6 – Assessment Consultation Responses (2/2)

**06** Will your organisation incur any costs in implementing P383?

Yes	6
No	2
Neutral	0
Other	0

### ■ **Six** voted **yes**

- Five who voted yes said the cost was a one off initial sum, or that it was a minor resource cost
- National Grid ESO responded “Our overall anticipated expenditure for CMPs 280 and 281, as well as this P383 is around £1.5m. These are one-off costs. We have not isolated costs for P383 as without CMPs 280 and 281 we do not believe P383 would be necessary and therefore no costs would be incurred.”

### ■ **Two** voted **no**

- “We do not envisage that we will incur any costs in implementing P383 at this time. However, it is an administratively complex solution which may introduce future additional costs for our Supply Business.”

## Q7 – Assessment Consultation Responses

**07** Do you agree with the Workgroup’s assessment of the impact on the BSC Settlement Risks?

Yes	5
No	0
Neutral	3
Other	0

### ■ **Four** were **in agreement** with the Workgroup

- A Party agent commented “Whilst there are the risks associated with increased activities these should not be materially significant, as P383 builds on processes that either exist or in development.”
- Another Party Agent said that they agree that P383 is unlikely to materially impact BSC Settlement Risks. In the event Settlement Risks are materially impacted the PAF is able to manage these. In parallel P383 introduces insurance measures to monitor and manage compliance with these new non Settlement arrangements.
- National Grid ESO responded “Whilst we understand a view that new activity could affect Party Agent’s abilities to deliver their existing requirements we do not consider this risk to be material, especially as this new activity will be supported by current and new processes.”

### ■ **Three** had **no comment**

## Q8 – Assessment Consultation Responses

08

Please indicate how many storage facilities you expect Suppliers to be declaring under the process that P383 seeks to implement.

- One BSC Party said ‘We expect numbers to be in the 10’s rather than the 100’s of providers’
- Another respondent had the following concern:
  - “We have no information on the extent to which the Modification proposal will impact on suppliers. However, we are concerned that the proposal will place further obligations on suppliers and their agents and increase costs which they may be unable to recover.”

## Q9 – Assessment Consultation Responses

09

Do you agree with the Workgroup that the new obligations placed on Suppliers are appropriate in delivering the P383 solution?

Yes	4
No	2
Neutral	2
Other	0

- **Three** respondents **agreed** with the Workgroup
  - “The obligation are driven by the CUSC obligations as such the supplier is the only part that can take on the obligations and provide/receive storage applications.”
  - National Grid ESO responded that they did not believe Suppliers are in a position to assess the compliance of a Storage Providers declaration but accept that they may choose to do so. However, they expect Suppliers to manage their Party Agents and customers (storage) to resolve settlement-related issues including invalid declarations and resubmission of data.
- **Two** respondents gave **no comment/voted N/A**
  - “Delivering an SVA solution will impact on Suppliers where they are responsible for the relevant metering systems.”
- **Two** respondents voted **no**
  - Both respondents wish the legal text to be altered to include VLPs as well as Suppliers

# Q10 – Assessment Consultation Responses

**10** Do you agree with the Workgroup’s recommended Implementation Date?

Yes	7
No	0
Neutral	0
Other	1

- **Seven** respondents voted **yes**

- “It is appropriate that the P383 implementation date is tied to the implementation date of CUSC Modifications CMP280 and CMP281.”
- National Grid ESO agreed that P383 should align with WACM1 of CMP280, CMP281, DCPs 341 and 342. However, if the implementation date of CMPs 280 and 281 is moved, then P383 should be changed accordingly.

- A HHDA voted **partial**

- They highlighted a risk in that market conditions and requirements may change between now and then.
- They asked how will ELEXON track that any other changes do/don’t impact P383.
- They suggested it may be useful to consider an extra reminder/ newscast type of communication as the go live date approaches
  - ELEXON will actively monitor related BSC Modifications, Change Proposals and other system changes. We will then make decisions on a case by case basis as to whether and how we communicate conflicts or implications of overlapping business requirements or changes to baseline conditions.

# Q11 – Assessment Consultation Responses

11

Is it appropriate for a storage operator to submit their own declarations where such storage operator is a BSC Party?

Yes	2
No	2
Neutral	4
Other	0

- **Two** voted in **favour**

- “Ensures accountability under the BSC & acknowledgment of all responsibilities.”

- A BSC Party voted **against**

- “The submission should be via the supplier as they are the party with the obligation and who receive the relief that can potentially be passed on the storage customer”

- National Grid ESO voted **against**

- “Whilst it is appropriate in principle (that is, we have no particular objection to it), we believe the Supplier should be responsible for submission in order to ensure that they have visibility of the MSID(s) and contracts affected to aid in their own forecasting and internal processes. The Supplier is accountable for settlement and therefore should have all requisite information to enable them to fulfil their obligations.”

- **Four** respondents were **neutral**

- One respondent said that Ofgem issued a “Statutory Consultation on electricity generation license changes and next steps” on “Clarifying the regulatory framework for electricity storage”. Given this is a license condition, it would seem appropriate to review the requirements set out in the proposed Modification to ensure that they do not duplicate the processes envisaged under the License.

## Q12 – Assessment Consultation Responses

**12** If any issue identified by SVAA were to be corrected from the Settlement Day the issue first took effect (up to 14 months), what is the longest period of time between checks by SVAA that you would be willing to accept? Please explain your rationale.

- A BSC Party commented:
  - “This should follow the normal settlement process”
- Another respondent commented:
  - “We do not have any detailed comments on this matter, though we note that the processes should ensure that the integrity of settlement is maintained at all times.”
- National Grid ESO responded
  - They agreed that this was something Suppliers and BSCCo are better placed to do. However, they noted that submission of incorrect data will affect parties’ UoS liabilities which can only be corrected up to 14 months in arrears and that stringent and regular checks are likely more appropriate.
- No other respondents provided a view on this question

## Q13 – Assessment Consultation Responses (1/2)

**13** How far back should any issue be corrected? For example if an issue is identified 14 months after the date it first started, should the correction be made from the point at which it first started or should the point at which a correction is applied be limited? If you believe it should be limited, by how much? Please explain your rationale.

- Please see the following views on this question
  - A BSC Party commented, “this should follow the normal settlement process, the regular monitoring will provide the comfort that long re-runs are unlikely to occur.”
  - “The normal processes should apply to the correction of settlement including the disputes process in relation to material errors.”
    - ELEXON notes that the Trading Disputes process would not apply to errors specifically relating to the P383 process or data, i.e. Trading Disputes only apply to Settlement Errors.
  - A Half Hourly Data Aggregator said “We are happy to support corrections in line with any other SVA traded site so 14 months is no issue.
  - Is it envisaged that there could be a Post Final dispute process? What might this look like?”

## Q13 – Assessment Consultation Responses (2/2)

**13** How far back should any issue be corrected? For example if an issue is identified 14 months after the date it first started, should the correction be made from the point at which it first started or should the point at which a correction is applied be limited? If you believe it should be limited, by how much? Please explain your rationale.

- **National Grid ESO** raised the following
- They noted that corrections should be permissible in accordance with the settlement calendar. However, the NETSO cannot use DF data in the reconciliation of UoS
  - This means there is a risk that if a declaration is submitted in error/ is invalid, the storage provider will have been exempt for e.g. BSUoS on imports for more than 14 months, but it is only the last 14 months of that liability which can be corrected and charges issued.
  - “Given the frequency of potential DF runs and the material effect on other parties’ charges we do not believe it would be appropriate to use DF data for reconciliation and so consider that the checks undertaken under this P383 will be critical in assuring parties that exemptions (total or partial) are being correctly applied.”

## Q14 – Assessment Consultation Responses (1/2)

**14** Do you agree with the Workgroup’s initial unanimous view that P383 does better facilitate the Applicable BSC Objectives than the current baseline?

Yes	6
No	0
Neutral	1
Other	1

- **Six** respondents voted in **favour** of the Workgroups initial unanimous view
  - Subject to inclusion of VLPs as a potential Registrant, P383 better facilitates BSC Objectives (a), (c) and (d), for the reasons outlined in the consultation document.
- **One** respondent was **neutral**
  - They agreed with P383 better facilitating Objective (c). However, they noted that additional processes are required to deliver the proposed solution, which is administratively complex.
  - They highlighted the new processes interacts with the declarations envisaged under proposals to amend the Generation License as set out in the Ofgem “Statutory Consultation on electricity generation license changes and next steps” on “Clarifying the regulatory framework for electricity storage,” published on 26 June 2019.

## Q14 – Assessment Consultation Responses (2/2)

**14** Do you agree with the Workgroup’s initial unanimous view that P383 does better facilitate the Applicable BSC Objectives than the current baseline?

Yes	6
No	0
Neutral	1
Other	1

### ■ National Grid ESO

- They said that this Modification will be better against objective (a) and (c) than the baseline.
- “No effect on ABOs (b), (f) or (g)”
- They agree that this is an an efficient solution as it utilises existing or soon-to-be-released processes. However, they do not believe that this is necessarily a balancing and settlement activity in and of itself and as such believe it is neutral against (d).
- NG ESO are concerned that P383 could be negative against (e)
  - “We are particularly mindful of Regulation (EU) 2019/943. Article 18, para 1 sets the requirement that, “...network charges shall not discriminate either positively or negatively against energy storage” and that there is a clear interaction between this European regulation and P383, and the charging modifications it seeks to facilitate.”
  - They said that this is a matter for the Authority in its assessment of the suite of cross-code modifications developed to meet its policy aims.

## Q15 – Assessment Consultation Responses

15 Do you have any further comments on P383?

Yes 3

No 5

- One respondent questioned “How will the proposed SVA Storage Facilities Register Publication requirement interact with Ofgem’s proposed Supplementary Standard Conditions for electricity storage requirement for licensees to publish similar information for each storage facility and final consumer at the electricity storage facility.” - It would be preferential to avoid duplication of publication requirements.
- Another respondent highlighted “On 26th June Ofgem issued a Consultation on electricity generation licence changes and next steps on Clarifying the regulatory framework for electricity storage. The proposed modification proposal should be reviewed in the context of the proposal to amend the Generation Licence and introduce new business processes under the license. These processes may remove the need for declaration under proposed arrangements, and may indeed require new processes to administer the potential outcomes.”

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## Q15 – Assessment Consultation Responses

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- A HHDA questioned that BR1.24 implies that a HHDA would continue to submit D385 reports even though the Supplier has changed from the original appointment; else SVAA would not receive data where the Supplier Id did not match the original appointment.
  - Under BR1.25 following the case where 'Where a Supplier changed, the SVAA should mark a declaration as no longer valid. New Supplier should not be notified in such instance.'
  - Does this mean SVAA would then issue a D354 with an end date matching the end date of the previous Supplier?
- This means the process would become:
  1. Receive D354 from SVAA
  2. Assuming this is valid, HHDA issues D355
  3. HHDA generates D385 in line with Settlement Calendar
  4. If D209 received by HHDA for new Supplier, continue to issue D385s
  5. SVAA detects difference in Supplier,
  6. SVAA instructs HHDA to stop issuing D385s, via D354 with appropriate end date
- HHDA questioned whether this was correct, as the requirement has not seemed to be captured in BSCP508.

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# Proposed changes following Assessment Consultation

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- Issue – following CoS, should SVAA issue a D0354 to the HHDA with an end date matching the end date of the previous Supplier?
  - Solution – SVAA should check that there is no other valid reason for HHDA to continue sending D0385 to SVAA, if not then D0354 will be sent to deappoint HHDA from date of CoS.
    - ELEXON to update BRs and BSCP accordingly
- Issue – Metered Data for Invalid MSIDs or Facilities should only be corrected up to 14 months prior to date that the error was identified.
  - Solution – BRs will be updated to reflect that metered data older than 14 months cannot be corrected, even if the validity of an MSID or Facility is determined to have commenced more than 14 months earlier.
- Issue – publication of information should include a monthly report of the total Storage Facility Imports and Exports per GSP Group and for each Settlement Period.
  - Solution – BSCCO will publish this report on the BSC Website.
    - This is in addition to any data BSCCo may report to the BSC Panel and a public register of declared Storage Facilities and the GSP Group they are connected in.
    - Should volumes be reported where only one Storage Facility in a GSP Group?

# Proposed BSC Solution – The declaration process

- SVA registered storage facility operator must send its Supplier(s) a director-signed declaration:
  - confirming that the facility complies with the CUSC criteria – see below
  - Containing additional information necessary to support the BSC process
  - Confirms that they are happy for details of the facility to be shared
- Whilst the CUSC criteria have not been finalised, the primary requirements are that an SVA Storage Facility:
  - Is operated by a generation license holder;
  - Has a sole function which is that of 'electricity storage'; and
  - is metered by HH SVA Metering Systems only, which do not measure any other activity except for electricity storage and those activities necessary to support electricity storage at the facility.
- Declaration must also include:
  - Storage Facility Name and address
  - Import and/or Export MSID(s)
  - Registered Supplier
  - Operator's Generation License Number
  - Operator's registered company name
  - Operator Contact Details
  - Director's Name
- A standard declaration template will be defined in BSCP508:
  - the EMRS Director Certificate may provide a model to work from – see [Working Practice 25 - Appendix 4](#).

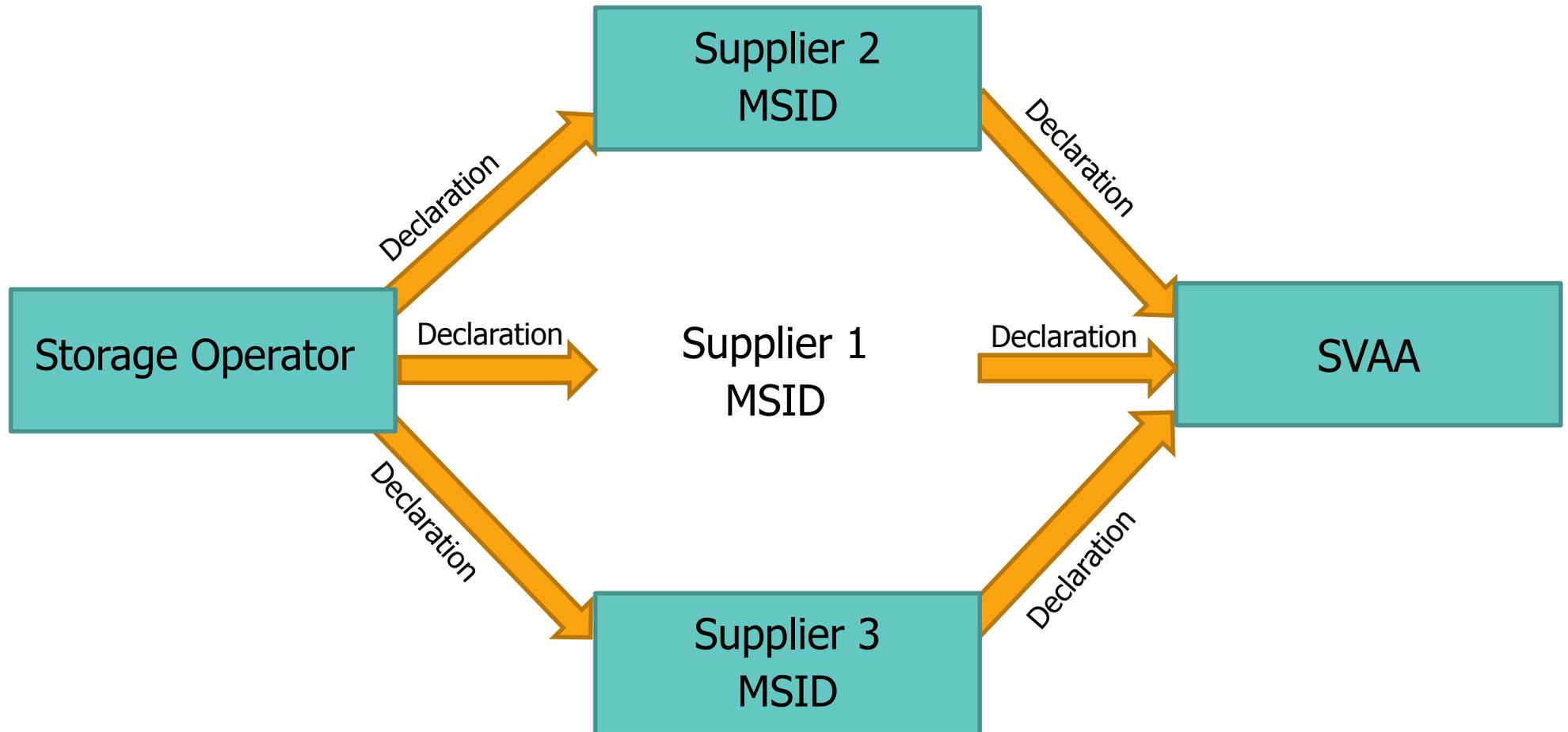
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# Proposed BSC Solution – The declaration process

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- Where a Storage Facility's Metering Systems are registered by one Supplier only, the operator need only prepare a single declaration.
  - If the storage facility's Metering Systems are registered with more than one Supplier, it must ensure separate declarations are prepared and sent to each Supplier, but that each declaration identifies any related MSIDs.
- In order to register the Storage Facilities, Suppliers must send declarations to SVAA.
  - The Supplier **may** perform its own-validation of the declaration.
- SVAA must check that any declaration is completed properly and that it is valid i.e. that it satisfies the criteria that will be set out in the CUSC in accordance with CMP280 and CMP281.
  
- Storage operators and Suppliers must notify SVAA of changes to an existing declaration, e.g. update or rescind a declaration

# The declaration process



# Proposed BSC solution – SVAA obtaining metered volumes



- SVAA uses ECOES to identify HHDA's appointed to Storage Facilities' Metering Systems
- SVAA appoints HHDA's using D0354
- Once appointed the HHDA will report HH Import and/or Export metered data to SVAA using D0385 and according to the prevailing SVAA Settlement Calendar for data aggregation.
- The HHDA will cease to report metered data to SVAA if the MSID(s) it is appointed to are the subject of a change of supplier (CoS) or change of Agent (CoA) event.
  - **Issue:** following CoS, should SVAA issue a D0354 to the HHDA with an end date matching the end date of the previous Supplier?
  - **Solution:** SVAA should check that there is no other valid reason for HHDA to continue sending D0385 to SVAA, if not then D0354 will be sent to deappoint HHDA from date of CoS.

# Proposed BSC solution – SVAA obtaining metered volumes

## Aggregated metered data

- In accordance with the SVAA Settlement Calendar, the SVAA will aggregate the HH Import data reported to it by HHDAs by:

- Settlement Day
- Settlement Period
- Supplier BMU
- Measurement Class

the SVAA will calculate distribution losses for these aggregated metered volumes.

When aggregating metered data, the SVAA will check for MSIDs with missing Imports and Exports investigate missing data and resolve these exceptions

- **Issue:** Metered Data for Invalid MSIDs or Facilities should only be corrected up to 14 months prior to date that the error was identified.
- **Solution:** BRs will be updated to reflect that metered data older than 14 months cannot be corrected, even if the validity of an MSID or Facility is determined to have commenced more than 14 months earlier.

## Proposed BSC solution – SVAA providing aggregated metered volumes

- SVAA must report the following to the NETSO via the P0210:

BMU	Explanation	Group
Corrected Period BMU Gross HH Demand	Is its Period BMU Gross HH Demand minus Period BMU Storage Demand	It will be added to the HHB group
Period BMU Gross Storage Demand	Is the sum of gross Imports for successfully declared SVA Storage Facilities	It will be added to the HHB Group
Daily BMU Gross HH Storage Demand		It will be added to the TO3 group

- SVAA must continue to send the P0210 to the NETSO in line with timescales set out in BSCP503
- National Grid accept a standalone report that is not the P0210?

## Proposed BSC solution – BSCCo monitoring successful declarations

- The P383 proposed solution will establish ongoing assurance measures (or at least enable the BSC Panel to establish measures)
  - What, if any, specific measures should be specified in the BSC or its CSDs?
- We propose that the following ongoing measures are specified:
  - SVAA should send the BSC Panel a [monthly/ quarterly] report that summarises overall performance of the P383 processes, e.g.
    - the total metered volumes (by Supplier) reported in P0210 – over the reporting period
    - The numbers of declarations submitted, accepted and rejected
    - Details of any exceptions
  - SVAA must, at the request of BSCCo or the BSC Panel, or at least every [6 or 12] months, check the validity of all live declarations, i.e. that they remain compliant with CUSC criteria, carry out any necessary follow up investigation/analysis and report its findings to BSCCo.
  - The Panel upon reviewing any evidence provided by BSCCo may decide to exclude MSIDs from the SVAA's aggregation of Storage Facilities' metered data.
  - SVAA must make P383 data available/accessible to the BSC Panel, BSCCo [and NETSO?].
- **Issue:** publication of information should include a monthly report of the total Storage Facility Imports and Exports per GSP Group and for each Settlement Period
- **Solution:** BSCCO will publish this report on the BSC Website.
  - This is in addition to any data BSCCo may report to the BSC Panel and a public register of declared Storage Facilities and the GSP Group they are connected in.
  - Should volumes be reported where only one Storage Facility in a GSP Group?



**A 'common registry' -  
Interaction with related  
BSC Modifications**

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## A 'common registry'

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- P383 proposes to create a 'registry' to store information about declared Storage Facilities and Metering Systems.
- This is similar to requirements under P344 (TERRE), P354 (ABSVD), P375 (Secondary Metering) and P388 (P344/354 alignment).
- ELEXON is exploring how a common technical solution, a 'common registry' of MSIDs, might support these BSC Modifications and future requirements
- To facilitate this work, we propose that the P383 solution is modified such that:
  - the proposed changes to BSCPs are now published for illustrative purposes only;
  - Business Requirements **1.03, 1.07 and 1.11** are amended so certain provisions and data items are for illustrative purposes only; and
  - The BSCP legal texts, including the final data items to be declared by Operators, are determined as part of the Implementation project should P383 be approved.
    - This would mean that either the BSC Panel or SVG would approve the final BSCPs



**Confirm solution**  
Any Alternatives?



**Confirm BSC legal text**



# **P383 Terms of Reference**

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## Confirm Terms of reference (1/2)

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- a) What changes are needed to BSC documents, systems and processes to support P383 and what are the related costs and lead times?
- b) Are there any Alternative Modifications?
- c) Should P383 be progressed as a Self-Governance Modification?
- d) Does P383 better facilitate the Applicable BSC Objectives than the current baseline?
- e) Based on the solutions for Electricity Market Reform (EMR) reporting and P344, are there specific lessons or changes that should be incorporated into this solution?
- f) Whether this solution clearly sets out consistent provisions that will effectively support the operation of CMP280 WACM and/or CMP281?

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## Confirm Terms of reference (2/2)

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- g) Whether the approach to assurance is appropriate and whether there are any particular assurance measures that should be specified in the BSC or CSDs or if not specified in the BSC or CSDs that the Panel should consider adopting?
- h) What wider data provisions could be made available once the data has been collected as this would be useful for Parties trading in the market, and what data flows would be appropriate to use?
- i) In Ofgem's open letter on storage it had indicated that it is looking at a distribution site solution, the Workgroup should consider the solution being developed to support CUSC and also to support DCUSA.

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# Applicable BSC Objectives

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- a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission License
- 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 and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation
- g) Compliance with the Transmission Losses Principle

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## Proposer view on Applicable BSC Objectives (1/2)

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- **Objective (a):** The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission License
  - P383 proposes to put in place processes that will collect, aggregate and report metered volumes to the Transmission Company; and
  - By building on best practice and making best use of existing and forthcoming centralised BSC processes and Systems, this solution will enable the efficient discharge of the Transmission Company’s license obligations.
  
- **Objective (c):** The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission License
  - P383 is necessary to support the implementation of the CMP280 WACM and CMP281; and
  - P383 is essential to promoting effective competition in the generation of electricity.

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## Proposer view on Applicable BSC Objectives (2/2)

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- **Objective (d):** Promoting efficiency in the implementation of the balancing and settlement arrangement
  - P383 seeks to build on existing processes and make use of forthcoming processes, systems and interfaces.
- Neutral on all other Objectives

# Initial Workgroup view on Applicable BSC Objectives

Objective	View
(a) – TC discharge of Transmission Licence obligations	<b>Majority Support</b> – Will put in place processes to collect, aggregate and report metered volumes to NETSO, will also build on best practise. <b>One neutral.</b>
(b) – efficient, economic and co-ordinated operation of Transmission System - <b>neutral</b>	
(c) – Promoting effective competition	<b>Unanimous Support</b> – Will support CMP280 WACM and CMP281.
(d) – Promoting efficiency in the implementation of the BSC arrangements	<b>Unanimous Support</b> – Efficient as using existing systems and processes
(e) – Compliance with EU law - <b>neutral</b>	
(f) - Implementing and administrating the arrangements for the operation of CFD and CM - <b>neutral</b>	
(g) - Compliance with the Transmission Losses Principle - <b>neutral</b>	

# Initial Workgroup view on Applicable BSC Objectives

Member	Proposed						
	(a)	(b)	(c)	(d)	(e)	(f)	(g)
Simon (Proposer)	+	N	+	+	N	N	N
Andy	N	N	+	+	N	N	N
Nik	+	N	+	+	N	N	N
Binoy	+	N	+	+	N	N	N
Ian	+	N	+	+	N	N	N
Robert	+	N	+	+	N	N	N
+	<b>5</b>	0	<b>6</b>	<b>6</b>	0	0	0
-	0	0	0	0	0	0	0
N	1	<b>6</b>	0	0	<b>6</b>	<b>6</b>	<b>6</b>

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# Vote

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- Any Alternative solutions?
- BSC Applicable Objectives
- Self-Governance
- Legal Text

# Progression timeline

Event	Date
Workgroup Meeting 1	29 April 2019
Teleconference 2	11 June 2019
Assessment Procedure Consultation	2 July – 22 July 2019
Workgroup Meeting 3	29 July 2019
Assessment Report to Panel	8 August 2019
Report Phase Consultation	13 August – 27 August 2019
Present Draft Modification Report to Panel	12 September 2019
Issue Final Modification Report to Authority – aligning with CUSC and DCUSA Mods	16 September 2019

**Next Step:** Assessment Report presented to Panel on 8 August 2019.

