
P463 – Digital Meeting Etiquette

- Welcome to the P463 Workgroup meeting 3 – we will start shortly
- No video please to conserve bandwidth
- Please stay on mute unless you need to talk – use IM if you can't break through
- Talk – pause – talk

ELEXION

P463 - Meeting 3

Introduce a Standard Change Process

10 April 2024

Meeting objectives and agenda

- Agree the solution and gather initial Workgroup views in order to proceed to the Assessment Procedure Consultation.

No.	Agenda Item	Lead
1.	Welcome and Meeting objectives	Lawrence Jones – Chair (Elexon)
2.	P463 Summary of actions from previous Workgroups	Serena Tilbury – Lead Analyst (Elexon)
3.	Review of proposed redlining Market Domain Data Housekeeping	Lawrence Jones
4.	Terms of reference and gathering views, specific ToR: definition of criteria, appeal process	Elexon and Workgroup
5.	Next steps	Serena Tilbury
6.	AOB & Meeting close	Lawrence Jones

P463 Summary of actions from previous Workgroup Meetings

No.	Action	Owner	Due by
3.0 Energy Code Reform	Jonathan from Ofgem is to look into whether the DIP change process comes under the purview of the Energy code reform or if it gets picked up because of the fact that Elexon will be managing it in the early days.	Jonathan Coe	WG3
3.1 MDD & MHHS	Elexon to discuss with Andrew Margan whether there are any issues with us changing the MDD processes in BSCP509.	Elexon	Meeting 27/03/24 – update to be given during WG3
3.5 Revisions to criteria	Workgroup to consider the proposed changes to the low-risk criteria, particularly the removed text (orange/yellow), the consequence of failure text (purple/red), and the inclusion of settlement (red).	Workgroup	Sent to WG on 03/04/24
5 Next steps	Elexon to issue updated redlining to the workgroup based on outcomes of discussion in WG2.	Elexon	Sent to WG on 03/04/24
	Workgroup members are to review the updated redlining offline before the next meeting.	Workgroup	Due: 12pm 09/04/24



PROPOSED REDLINING

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Updates to the proposed redlining in BSCP40

- Re-baselined on to the latest version 22.0, following the implementation of CP1584 in the Feb 24 Release
- Simplified definition of Standard Change Log
- Expanded consultation process in 3.16 from one row to three for greater clarity
- Combined rows 3.17.3 and 3.17.4
- Added appeal route in 3.16
- Updated definition of Mandatory Notice Period to be not less than 15WDs, to allow for appeals. 15WDs is in line with Modification process
- Added a note to 3.16 about removing items from the Standard Change Log, to avoid adding a whole new process table.
- Updated definition of Mandatory Notice Period, in order to allow for changes to it



MARKET DOMAIN DATA (MDD)

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MDD errors over the last three years

MDD Version	What was the error?	How was the error identified?	Was Settlement impacted?	
V313	A Change Request (CR) was withdrawn as some LLFC/SSC/PC combinations were being raised in areas where there was no corresponding Average Fraction of Yearly Consumption (AFYC) data.	Market Participant Impact Assessment	No	Pre Publish
V317	A CR creating combinations for use with Token meters but no other legacy Prepayment type was withdrawn, as it was highlighted the infrastructure would include legacy key meters.	Market Participant Impact Assessment	No	
V323	An incorrect Effective From Date was identified and corrected from 11/05/2022 to 18/05/2022.	Market Participant Impact Assessment	No	
V325	A Change Request creating new SSCs was withdrawn, as it was identified the data was incomplete and could be simplified.	Market Participant Impact Assessment	No	
V330	A CR end-dating a Supplier MPID was withdrawn, as SVG advised the MPID still had assigned MPANs.	SVG	No	
V345	AFYC records were end-dated or deleted in error. MDD was corrected and re-published before the go-live date.	Market Participant	No	Post Publish
V340	A CR was omitted from MDD in error. As there was no material impact, the CR was included in the next available MDD Version.	Market Participant	No	
V333 - 336	Erroneous end-dates were added to two AFYC records and the solutions in MDD V334 and V345 caused further issues. This required some Participants to make manual amendments to the D0269 or D0270 files.	Market Participant	No	
V320	There was an error in a Clock Time Change where one date had '2222' instead of '2022'. Until it was rectified in MDD V321, some Market Participants had to make a manual amendment to the D0269 or D0270 files.	Market Participant	No	
V319	A new Distributor Short Code of '77' was created and assigned to MPID 'AMSN' under Role Code R (Distributor). An associated Role Code P (PRS Agent) is required under the validation rules in MDD but this was not added for 'AMSN'. This was corrected in MDD V320.	Market Participant	No	

MHHS Impacts and Benefits

- Colleagues in MHHS described P463 'Introduce a Standard Change' as a sensible approach
- Confirmed that this would not impact the design of the MHHS Target Operating Model
- MHHS agreed with the view that, from a code drafting perspective, a programme CR would not be necessary. Amendments to BSCP509 would be incorporated into BSCP707
- Including MDD and subsequently Industry Standing Data (ISD) Change Requests in the Standard Change Process could reduce the risk to MHHS Migration that capacity is unused between PAB approval for Qualification and Migration activity
- The submission and processing of ISD via the Customer Solution has been configured around SVG approval. Some minor build changes would be required (Helix impact – CR required)



HOUSEKEEPING (HK)

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Housekeeping as a Standard Change

- At the first Workgroup meeting it was suggested that housekeeping changes could be suitable for following the Standard Change process
- The Issue 102 'BSC Change Process Review' group considered whether the housekeeping change process could be streamlined
 - The group agreed that it should be, but were unable to progress any significant changes to the Modification housekeeping processes as they are constrained by the BSC Modification procedures in the Transmission Licence
- Consequently, housekeeping changes to the BSC could not be made a Standard Change without first amending the Transmission Licence.
- However, the licence does not define the process to amend Code Subsidiary Documents (CSDs) and therefore housekeeping changes to CSDs can be considered for the Standard Change process:
 - Our initial assessment for Housekeeping changes to the CSDs is:

Criteria	Rationale
Low Risk	HK changes should not amend the intent of the rules in anyway. They therefore should pose no risk to Settlement, systems or processes and are therefore low risk.
Repeatable	The process to amend the CSDs follows a well defined document management process that has been done thousands of times
Predictable	The outcome is highly predictable, as the tracked changes clearly show the changes to be made

- If the appeal route is included, this should provide comfort that, should a party disagree with a proposed HK change, it can be appealed
- We therefore recommend that HK changes are a suitable candidate to follow the Standard Change process and should be made such, as part of P463



TERMS OF REFERENCE

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P463 Specific Terms of Reference

ToR	Details
a)	What criteria should be met in order for a change to be established as a Standard Change?
b)	Is there a need for an objection or appeal mechanism within the Standard Change framework? If so, how should it be implemented?
c)	Which changes could follow the Standard Change process and, of those, which should be included in the Modification Proposal?

Terms of Reference (a)

What criteria should be met in order for a change to be established as a Standard Change?

- **Draft Criteria:**
- **Low risk** - A change is considered low risk when it has a minimal or negligible chance of causing adverse effects to **Settlement and** the IT environment or the business processes it supports
- **Repeatable** - This relates to the ability to implement the change consistently over and over again without variations in the process or outcome. For a change to be considered standard, it must be repeatable. This means that the same steps are followed each time, and the results are consistent every time the change is made
- **Predictable** - This pertains to the expected outcomes of implementing the change. A predictable change is one where the outcome is known based on previous implementations or thorough testing. There shouldn't be any surprises when the change is made. The results of the change should be consistent every time it's implemented
- **Any other criteria published on the BSC Website**
- What are Initial Workgroup views?

Terms of Reference (b)

Is there a need for an objection or appeal mechanism within the Standard Change framework? If so, how should it be implemented?

- Does the Workgroup think that an objection or appeal mechanism is necessary within the Standard Change framework?
- If so, how should this be implemented?

Terms of Reference (c)

Which changes could follow the Standard Change process and, of those, which should be included in the Modification Proposal?

- Initial list of potential changes that could be classified as a Standard Change:
 - Adding, amending or removing Fuel Types on BMRS
 - Changes to Market Domain Data (MDD)
- Does the Workgroup consider any other Change Types to be good candidates for Standard Change?

P463 Standard Terms of Reference

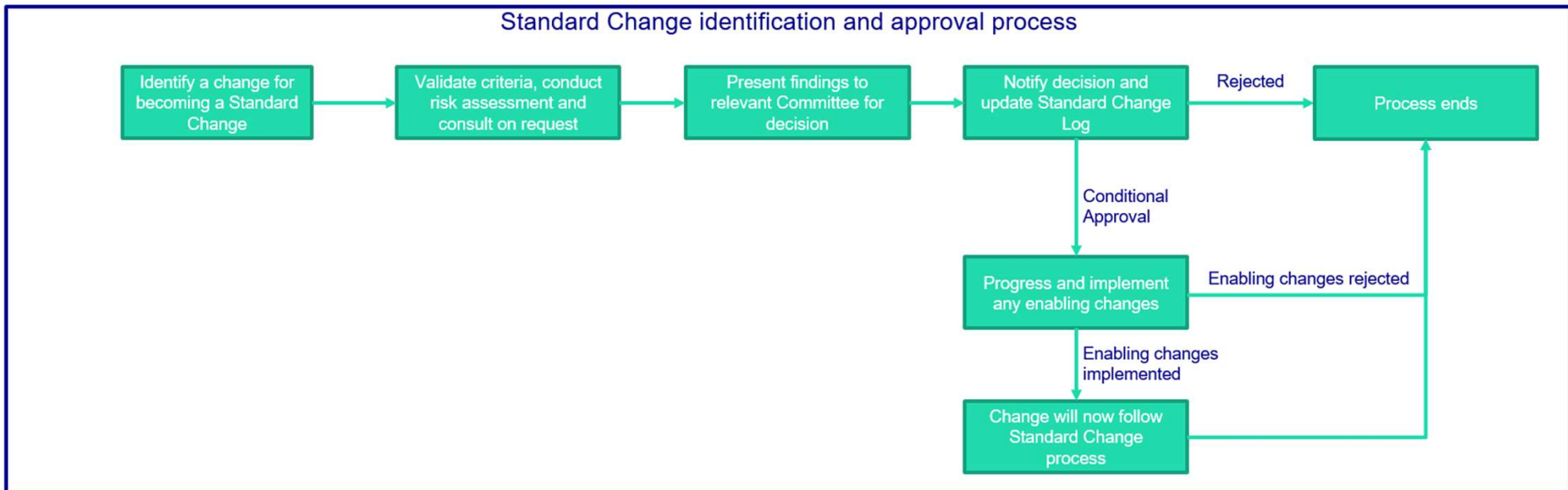
ToR	Details
d)	How will P463 impact the BSC Settlement Risks?
e)	What changes are needed to BSC documents, systems and processes to support P463 and what are the related costs and lead times? When will any required changes to subsidiary documents be developed and consulted on?
f)	Are there any Alternative Modifications?
g)	Should P463 be progressed as a Self-Governance Modification?
h)	Does P463 better facilitate the Applicable BSC Objectives than the current baseline?
i)	Does P463 impact the EBGL provisions held within the BSC, and if so, what is the impact on the EBGL Objectives?

P463 Standard Terms of Reference (d)

(d) How will P463 impact the BSC Settlement Risks?

Fuel Type changes and Housekeeping – no perceived risk to Settlement

MDD changes – no perceived risk, subject to the Workgroup’s solution. Risk and Assurance are satisfied that there is sufficient opportunity built into the identification and approval process for a potential Standard Change to be disqualified and progressed as a Mod or CP.



P463 Standard Terms of Reference (e)

(e) What changes are needed to BSC documents, systems and processes to support P463 and what are the related costs and lead times? When will any required changes to subsidiary documents be developed and consulted on?

Costs are estimated to be between 1k – 7k, subject to the agreed solution.

Item	Redlining	Status
Section F	Amendment to include BSC Standard Change procedure	Drafted
Section Q	Fuel Type changes	Drafted
Section X-1	Addition of Standard Change to glossary terms	Drafted
BSCP40	Inclusion of Standard Change process Housekeeping	Drafted
BSCP509	MDD	Drafting required

P463 Standard Terms of Reference (f)

(f) Are there any Alternative Modifications?

- Initial view is that there is not an Alternative Solution for this Modification.
- Does the Workgroup agree?

P463 Standard Terms of Reference (g)

(g) Should P463 be progressed as a Self-Governance Modification?

- Initial position is that P463 should not be considered suitable for Self Governance decision as it proposes to amend the Code's governance procedures
- To what extent is the amended Code governance procedure material?
 - It could be argued that it is a material amendment as it will allow certain types of changes to be excluded from the Mods and CP process
 - Conversely, it could be argued, while this proposal modifies the Code's governance, introducing the Standard Change framework itself has no immediate impact on self-governance. Only changes categorised as Standard Changes will follow this process. Therefore, it could be argued that the proposal's impact depends on the specific types of changes and their associated enabling changes, not the framework itself. Though Standard Changes are inherently low-risk, their specific impact on self-governance criteria still needs evaluation.
- What do the Workgroup think?

P463 Standard Terms of Reference (h)

(h) - Does P463 better facilitate the Applicable BSC Objectives than the current baseline?

- Initial view is that P463 better facilitates:
 - d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements
- By introducing a Standard Change process, P463 will allow certain changes to be progressed more efficiently, reducing the burden for industry and Elexon.
- Does the Workgroup agree?

P463 Standard Terms of Reference (i)

(i) Does P463 impact the EBGL provisions held within the BSC, and if so, what is the impact on the EBGL Objectives?

- We believe that P463 does not impact on the EBGL provisions held within the BSC, nor does it extend them.
 - It therefore has no impact on the EBGL objectives
- The BSC paragraphs that constitute EBGL are contained in BSC Annex F-2
 - P463 Legal Text is not expected to impact any of these, but this view will be confirmed once drafting is completed



ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

Assessment procedure consultation questions

1. Do you agree with the Workgroup's initial unanimous/majority view that P463 does better facilitate the Applicable BSC Objectives than the current baseline?
2. Do you agree with the Workgroup that the draft legal text in Attachment X delivers the intention of P463?
3. Do you agree with the Workgroup that the draft amendments to the CSDs in Attachment X deliver the intention of P463?
4. Do you agree with the Workgroup's recommended Implementation Date?
5. Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P463 which would better facilitate the Applicable BSC Objectives?
6. Do you agree with the Workgroup's assessment of the impact on the BSC Settlement Risks?
7. Do you agree with the Workgroup's assessment of the consumer benefits?
8. Do you agree with the Workgroup's assessment that P463 does not impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?
9. Will P463 impact your organisation?
10. How much will it cost your organisation to implement P463?
11. What will the ongoing cost of P463 be to your organisation?
12. How long (from the point of approval) would you need to implement P463?
13. Do you have any further comments on P463?

Does the workgroup have any other questions that they think should be included in the Assessment Procedure Consultation?



PROGRESSION PLAN & NEXT STEPS

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P463 Progression Plan

Event	Date
Present IWA to Panel	9 November 2023
Workgroup meeting 1	19 December 2023
Workgroup meeting 2	6 March 2024
Workgroup meeting 3 – to review redlining and gather WG initial views	10 April 2024
Assessment Procedure Consultation (15 WDs)	22 April 2024 – 13 May 2024
Workgroup meeting 4 – review AC responses and gather WG final views	w/c 20 May 2024
Workgroup Report presented to Panel	13 June 2024
Report Phase Consultation (10 WDs)	18 June 2024 – 1 July 2024
Present Draft Modification Report to Panel	11 July 2024
Issue Final Modification Report to Authority	15 July 2024

P463 Workgroup input – dates for diaries

Event	Date
Present IWA to Panel	9 November 2023
Workgroup meeting 1	19 December 2023
Workgroup meeting 2	6 March 2024
Workgroup meeting 3	10 April 2024
Workgroup to review of Assessment Consultation	w/c 15 April 2024
Workgroup meeting 4	w/c 20 May 2024
Workgroup to review Assessment Report	29 May 2024 – 31 May 2024

MEETING CLOSE

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THANK YOU

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6 March 2024