

CP Consultation

CP1600 ‘Amend BSCP301 to remove the Funds Accession paper form from being submitted via e-mail’

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About This Document

You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary](#)¹.

The purpose of this Change Proposal (CP) Consultation is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP1600. The ISG and SVG will then consider the consultation responses before making a decision on whether or not to approve CP1600.

There are 4 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 ISG and SVG initial views on the proposed changes.
- Attachment A contains the CP proposal form.
- Attachment B contains the proposed redlined changes to deliver the CP1600 solution.
- Attachment C contains the specific questions on which we seek your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish to be considered.



Committees

SVG285/05

ISG285/04



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¹ <https://www.elexon.co.uk/glossary/?show=all>



Not sure where to start?

We suggest reading the following sections:

- Have 5 minutes? Read section 1
- Have 15 minutes? Read sections 1, 4, 5 and 6
- Have 30 minutes? Read all sections
- Have longer? Read all sections and the annexes and attachments

Why change?

[BSCP 301 'Clearing, Invoice and Payment'](#)² requires BSC Parties to submit Trading Charges and bank details to Funds Administration Agents (FAA) through two methods: an online form in Elexon Kinnect and a paper BSCP301 Funds Accession Form. However, the existence of these dual processes has led to data inconsistencies and missing information due to misalignment of mandatory fields, increasing the risk of errors during data entry. Ongoing data anomalies may significantly impact the migration to the new FAA system, which will utilise an API for direct data sourcing, emphasising the need for robust data controls that the current paper process does not support.

Solution

This CP proposes to amend BSCP301 to enable the removal of BSC Parties being able to submit a BSCP301/04(a) and BSCP301/04(b) paper form to register/amend details required for FAA.

Impacts and costs

The estimated central implementation costs for this CP will be >1k.

Implementation

This CP is proposed for implementation in January 2025 as part of a Special BSC Release.

² <https://bscdocs.elexon.co.uk/bsc-procedures/bscp301-clearing-invoicing-and-payment>

2. Why Change?

What is the issue?

BSCP 301 'Clearing, Invoice and Payment' requires BSC Parties to provide their Trading Charges Details/Bank details that are required for Funds Administration Agents (FAA).

Currently, these details for FAA can be submitted by the BSC Party via two routes.

- Using the on-line form to 'Register Bank Details' for Trading Charges on the Elexon Kinnect Customer Solution
- Submitting a paper BSCP301 Funds Accession Form via email

For both of the two options for the details will also need to be added into the FAA system. If a paper form is submitted the details will have to be inputted the FAA system by the FAA user.

During the preparation as part of the Data Cleanse for the new FAA System, it has shown that due to the two methods of the processes above, data can be missing or inconsistent due to misalignment of mandatory fields across both forms.

This can result in incorrect data being sent to the new FAA system, meaning inefficiencies within the FAA-Replacement and with entering data within BSCP 301.

As highlighted in the background section below, having two process routes for submitting these details has led to issues including data misalignment (e.g., differing mandatory/optional field requirements), resulting in missing or inconsistent data across both forms and systems. This has also led to unnecessary duplication of manual input efforts and increased the risk of incorrect data entry.

Within the current FAA System there are ongoing data anomalies and misalignments that could significantly impact the data migration required for the new FAA transition. These issues contribute to duplication of effort and unnecessary manual input, both of which increase the risk of incorrect data being entered manually.

Once the new FAA system has been implemented data will be sourced to FAA via an API directly into Elexon Kinnect there robust data controls will need to be place and the current process of the paper form does not support this and is believed to be a risk.

Background

The Funds Administration Agent is being updated As part of the Elexon Strategy and the implementation of Elexon Kinnect, a cloud based platform, the FAA systems are being replaced. The FAA transfers Trading Charges to and from BSC Parties and manages the BSC Credit Cover arrangements. Kinnect is flexible, scalable and adaptable. Creating a new FAA Service, will modernise the BSC banking and payments processes, be less resource-intensive, reduce manual processes and improve controls.

This CP has arisen around the current submission process for BSC Parties, as they currently have two options for submitting these details, the dual submission methods, each with potentially different required fields, have led to inconsistencies and missing data during the data cleanse process for the new FAA Replacement. This misalignment can result in inefficiencies when data is transferred or used within the FAA system. The upcoming FAA



What is Elexon Kinnect?

Elexon Kinnect is a digital customer-centric platform delivering a smart and flexible central solution for the industry, which will be delivered through a number of releases over the next few years. The modular technology it uses will enable us to implement BSC rule changes more quickly, and provide speedier support for innovation by existing companies and new entrants.

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Replacement aims to streamline the processes and improve data integrity. Inconsistent data would counteract the improvements that we had originally planned for the new FAA System, therefore a change to BSCP 301 is needed to improve and support the FAA Replacement.

During preparation for the new FAA system, a Data Cleanse was required to ensure a consistency across the system and processes, it was identified during the cleanse that certain areas invited a change to improve the reliability and accuracy of the new FAA system.

As part of this activity, misalignment in data was identified due to the existence of two different process methods, leading to the following risks and issues:

- The current paper form process does not align with the specified field types in the online form with Elexon Kinnect, resulting in discrepancies in data types and mandatory/optional fields, which can cause missing data and anomalies.
- The data formats differ across both forms and systems.
- This misalignment will hinder support for the new FAA processes once implemented, particularly in relation to API source data.

This Change is related to [P466 'Section N Modernisation'](#) which involved amending BSC Section N to align it with modern practices and the updated FAA systems The processes should reduce duplication and make the process more efficient.

3. Solution

Proposed solution

This Change Proposal (CP) aims to amend BSCP301 to eliminate the process that allows BSC Parties to submit paper forms BSCP301/04(a) and BSCP30104(b) for registering or amending Funds Accession details required by the FAA. Instead, BSC Parties will only be able to provide these details through the online form available via the Self-Service gateway on Elexon Kinnect

The online equivalents of forms (a) and (b) are already accessible in Elexon Kinnect for registering new Trading Charges bank details. Additionally, a further review has been conducted to identify other improvements to streamline the process and enhance the online form for BSC Parties.

Below is a table which highlights the differences with the Online form found on Elexon Kinnect.

Data field on the on-line form in Elexon Kinnect	Comments/ Changes to on-line form	Rationale for Change
VAT Number	Validation to be applied so that a user must enter VAT country code followed by number format. e.g. GB123456789	This will allow correct VAT reporting/consistency and enable the removal of EU fields shown below
Type of Credit Cover	This data field to be removed.	The process for BSC Parties to lodge credit cover is outside of the system so this is an unnecessary field within the form so to be removed.
Method of Payment for Trading Charges	Currently it allows the user to pick from a list, but it is a mandatory field. To be changed to optional	If the user selects the direct debit option, this will allow them to download a direct debit mandate form if required but they do not have to fill in as circumstances can change and this process is dealt with outside the system.
Payment Notice e-mail address (used for delivery of Advice notes etc.)	Currently a user has to set up a contact to enable them to enter the payment notice e-mail address. Field type to be changed.	Better experience for the user as they can enter an e-mail address without having to set up unnecessary contact.
For the purposes of Council of the European Union Directive 2003/92/EC as regards the rules on the place of supply of gas and electricity, should	To be removed	Not Required as the change of VAT number format will allow correct VAT reporting. See VAT number

the place of supply of electricity for this Party ID be considered in the UK or not		
If for the purposes of Council of the European Union Directive 2003/92/EC as regards the rules on the place of supply of gas and electricity, the place of supply of electricity for this Party ID is within the European Union, please supply the two-letter identifier code for the place of supply country	To be removed	Not Required as the change of VAT number format will allow correct VAT reporting. See VAT number
Trading Charges Address	Currently a user cannot amend an existing Trading Charges address on the on-line form.	Required to enable the removal of the paper form

Rationale

Whilst this CP can be implemented independently of the new FAA Replacement, it will provide better efficiencies and a modern way of working.

Elexon believe that this CP is needed to support both the current FAA system and the upcoming FAA system re-development project.

For the Current FAA System this CP will:

- Ensure that accurate and consistent data is captured in both Elexon Kinnect and the FAA, facilitating effective data migration and ongoing processes.
- Reduce and mitigate unnecessary manual input to minimize the risk of data errors.

For the New FAA System (once implemented) this CP will:

- Continue to support the capture of accurate and consistent data as outlined above.
- Enable the API to source the correct data entered by BSC Parties.

This CP will facilitate the implementation of the new FAA system; however, this CP can be implemented prior to the implementation of the FAA Replacement.

- BSCP65 will be amended to align with the changes that will be made in BSCP 301, these include:
- Changes made to Section 4 Interface and Timetable Information

- 4.1.2 - Replaced reference to Funds Accession changed to Trading Charges Account and removed fax, post and e-mail under medium
- Footnote 2 - Replaced reference to Funds Accession to Trading Charges Account details
- 4.4.1 - Replaced reference to Fund Accession to Trading Charges Account and removed electronic and replaced with Self-Service Gateway
- Changes made to Appendix 2 - Market Entry Processes
 - BSCP301 - Replaced reference to Funds Accession to Trading Charges Account Details

You can find the redlined documents in Attachment B.

CP Consultation Question
Do you agree with the CP1600 proposed solution? <i>Please provide your rationale.</i>
We invite you to give your views using the response form in Attachment C

Proposed redlining

The proposed solution requires BSCP 301 and [BSCP65 'Registration of Parties and Exit Procedures'](#)³ to be updated, this looks to amend:

BSCP301 Section 1 Introduction

Section	Ref	Summary of Change	Rationale
1.2	Main Users of the Procedure and their Responsibilities	<u>Deleted text</u> Where a Party has access to the Self -Service Gateway and an equivalent online form is provided, the Party may use the online form as an alternative to the paper forms defined in this BSCP	Removed as the only form that had a paper and on-line equivalent is the BSCP301/04 (a) and (b). The paper form is being removed under this CP so this no longer applies
1.2	Main Users of the Procedure and their Responsibilities	<u>Deleted text</u> Please note that there will not always be a one-to-one equivalence between the data collected via the Self-Service Gateway and the paper forms defined in this BSCP. For example, data collected in one form may be collected by more than one online form. Conversely, a single online form may collect data from more than one paper form	Removed as text no longer relevant in this CP

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³ <https://bscdocs.elexon.co.uk/bsc-procedures/bscp-65-registration-of-parties-and-exit-procedures>

Section		Ref	Summary of Change	Rationale
4.5	Maintain Arrangements with Banks	4.5.1.1	<u>Amended text under Action Column</u> Submit completed on-line form for Trading Charges Account details for new or amended details, as necessary	To align the existing Funds accession form to Trading Charges Account details form as named on the on-line form
4.5	Maintain Arrangements with Banks	4.5.1.1	<u>Added/Amended text under Information Required</u>	To provide clarity in reference to the on-line form.
4.5	Maintain Arrangements with Banks	4.5.1.1	<u>Removed reference to Manual under Method</u>	To remove the submission of paper form from method
4.5	Maintain Arrangements with Banks	4.5.1.1	Added new footnote 6 that was previously in later part of document amending to represent submitting by Self Service Gateway. It is the responsibility of each Party to notify the FAA and BSCCo immediately upon any changes to its Trading Charges Account details by submitting an on-line form via the Self-Service Gateway. In the absence of such notification, and any notice or other communication given in connection with the Code or relevant BSC Procedure(s) and sent Trading Charges Account Details provided by a Party shall be treated as valid for the purposes of the Code, except where otherwise expressly provided in the Code or relevant Code Subsidiary Document	To state the responsibility of each Party to notify the FAA and BSCCo of changes
4.5	Maintain Arrangements with Banks	4.5.1.1	Removed text as part of footnote 7 Or has given an address within the EU but has not declared a VAT number and/or the two-letter country identifier for the relevant EU	Removed reference to EU as references to these fields have been removed
4.5	Maintain Arrangements with Banks	4.5.1.2	Removed reference to Funds Accession details and replaced with Trading Charges Account details	To align the naming of the existing form and on-line form
4.5	Maintain Arrangements with Banks	4.5.1.2	Removed reference BSCP301/04(a) and (b) and replaced with Trading Charge Account Details Removed text reference to Manual under Method	To align the naming of the existing form to the on-line form To remove the submission of paper form from method
4.5	Maintain Arrangements with Banks	4.5.1.3	Removed reference to Funds Accession Form to Trading Charges Account	To align the naming of the existing form and on-line form

Section		Ref	Summary of Change	Rationale
5.1.	Summary of Forms	5.1.4	Added Not in Use to Appendices BSCP301/04(a) Funds Accession Form BSCP301/04(b) Amendments to Funds Accession Details and deleted footnote 12	Added Not is Use as paper form no longer in use and an on-line form for Trading Charges Account details will be used to add new details or amend existing ones
5.1.	Summary of Forms	5.1.4	Deleted both form BSCP301/04(a) and (b)	Deleted forms as no longer in use. Only on-line

CP Consultation Question

Do you agree that the draft redlining delivers the CP1600 proposed solution?

If 'No', please provide your rationale.

We invite you to give your views using the response form in Attachment C

4. Impacts and Costs

BSC Party & Party Agent impacts and costs

This Change Proposal is a document-only change and therefore we understand that there will be no additional cost or direct impact on Parties.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
All BSC Parties	Elexon believe this will be a low impact as the online form already exists, this CP will only remove the Paper form from BSCP 301

Central impacts and costs

Central impacts

Elexon will need to amend BSCP 301 as part of this CP, and as a consequential change will update BSCP 65 to align with the changes that have been made within BSCP301.

This change has been made as a result of the improvements made to the online form as part of the new FAA System re-development project, this CP will be a consequential change to the FAA project causing an indirect Impact. No further costs will occur.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP 301BSCP 65	<ul style="list-style-type: none">Indirect Impact to the new FAA System

Impact on BSC Settlement Risks

Impact on BSC Settlement Risks
No impacts on Settlement Risks are anticipated.

Impact on Market-wide Half Hourly Settlement (MHHS)

Impact on MHHS
No impact on MHHS have been identified.

Central costs

The central implementation costs for this CP will be <1k.

CP Consultation Question

Will CP1600 impact your organisation?

If 'Yes', please provide a description of the impact(s) on your organisation and any activities which you will need to undertake between the approval of CP1600 and the CP1600 Implementation Date (including any necessary changes to your systems, documents and processes). Where applicable, please state which of the roles that you operate as will be impacted and any differences in the impacts between each role.

Will your organisation incur any costs in implementing CP1600?

If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs.

We invite you to give your views using the response form in Attachment C

5. Implementation Approach

Recommended Implementation Date

This CP is proposed for Implementation in January 2025 as part of a Special BSC Release. This is so that the benefits can be realised at the earliest opportunity, limiting any errors that are input into the FAA system and missing data due to the current misalignment of mandatory fields across different versions of the forms.

6. Initial Committee Views

ISG's initial views

Due to quoracy issues CP1600 went to the ISG as an Ex-committee item. ([ISG283/04](#)⁴)

SVG's initial views

Elexon presented the CP1600 Progression Paper to the SVG on Tuesday 5 November 2024 ([SVG285/05](#)⁵).

An SVG member commented that they had signing in issues with Elexon Kinnect and would further like to understand if this is common issue with industry. Elexon have recognised that there has been some log in issues as part of the Okta to Entra ID changes but consider this an isolated issue to the Entra Change and do not expect ongoing or further issues with accessing the system. . There were also comments on the implementation date being a special release, Elexon explained that implementing CP1600 outside of one of the three standard industry releases would allow the benefits to be realised sooner, limiting the errors that are input into the FAA system due to the current misalignment of mandatory fields across different versions of the forms. This would help minimise further data cleanse activities required in readiness for when the new FAA is implemented. Elexon also believe that since the Online form is already available via Elexon Kinnect the system Impacts to be low

Finally, the SVG commented on the ex-committee approach that Elexon had decided to take to present the Assessment Report and gain approval. They were unsure that they would be able to make a decision on an ex-committee date and wondered if Elexon could bring the Assessment Report to the January SVG. Elexon will amend the CP timetable accordingly, in the Assessment Report.

CP Consultation Question

Have you experienced any issues with signing in to Elexon Kinnect?

Please provide your rationale.

We invite you to give your views using the response form in Attachment C

⁴ <https://www.elexon.co.uk/meeting/isg283-2/>

⁵ <https://www.elexon.co.uk/meeting/svg285/>