

INITIAL WRITTEN ASSESSMENT for Modification Proposal P215 'Revised Credit Cover Methodology for Generating BM Units'

Prepared by: ELEXON Limited¹

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This document has been distributed in accordance with Section F2.1.10 of the Balancing and Settlement Code.²

P215 seeks to modify the Balancing and Settlement Code such that Final Physical Notifications are used in the calculation of Credit Assessment Energy Indebtedness for 'generating BM Units', instead of Credit Assessment Load Factors and Generation Capacity, in order to improve the accuracy of the Credit Cover arrangements for 'generating BM Units'. The definition of 'generating BM Units' would need to be explored in order to assess P215.

BSCCO'S RECOMMENDATIONS

On the basis of the initial assessment, BSCCo invites the Panel to:

- **DETERMINE that Modification Proposal P215 should be submitted to the Definition Procedure;**
- **AGREE the Definition Procedure timetable such that a Definition Report should be completed and submitted to the Panel for consideration at its meeting of 13 September 2007;**
- **DETERMINE that the P215 Modification Group be formed from members of the Settlement Standing Modification Group; and**
- **AGREE the Modification Group Terms of Reference.**

¹ ELEXON Ltd fulfils the role of the Balancing and Settlement Code Company ('BSCCo'), pursuant to Annex X-1 of the Balancing and Settlement Code (the 'Code').

² The current version of the Code can be found at <http://www.elexon.co.uk/bscrelateddocs/BSC/default.aspx>.

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SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

As far as BSCCo has been able to assess, the following parties/documents are potentially impacted by Modification Proposal P215.

Please note that this table represents a summary of the full initial impact assessment results contained in Appendix 2.

Parties	Sections of the BSC	Code Subsidiary Documents
Distribution System Operators <input type="checkbox"/>	A <input type="checkbox"/>	BSC Procedures <input type="checkbox"/>
Generators <input checked="" type="checkbox"/>	B <input type="checkbox"/>	Codes of Practice <input type="checkbox"/>
Interconnectors <input type="checkbox"/>	C <input type="checkbox"/>	BSC Service Descriptions <input checked="" type="checkbox"/>
Licence Exemptable Generators <input checked="" type="checkbox"/>	D <input type="checkbox"/>	Party Service Lines <input type="checkbox"/>
Non-Physical Traders <input type="checkbox"/>	E <input type="checkbox"/>	Data Catalogues <input checked="" type="checkbox"/>
Suppliers <input type="checkbox"/>	F <input type="checkbox"/>	Communication Requirements Documents <input type="checkbox"/>
Transmission Company <input checked="" type="checkbox"/>	G <input type="checkbox"/>	Reporting Catalogue <input type="checkbox"/>
Party Agents		
Data Aggregators <input type="checkbox"/>	H <input type="checkbox"/>	Core Industry Documents
Data Collectors <input type="checkbox"/>	I <input type="checkbox"/>	Ancillary Services Agreement <input type="checkbox"/>
Meter Administrators <input type="checkbox"/>	J <input type="checkbox"/>	British Grid Systems Agreement <input type="checkbox"/>
Meter Operator Agents <input type="checkbox"/>	K <input type="checkbox"/>	Data Transfer Services Agreement <input type="checkbox"/>
ECVNA <input type="checkbox"/>	L <input type="checkbox"/>	Distribution Code <input type="checkbox"/>
MVRNA <input type="checkbox"/>	M <input checked="" type="checkbox"/>	Distribution Connection and Use of System Agreement <input type="checkbox"/>
BSC Agents		
SAA <input type="checkbox"/>	N <input type="checkbox"/>	Grid Code <input checked="" type="checkbox"/>
FAA <input type="checkbox"/>	O <input type="checkbox"/>	Master Registration Agreement <input type="checkbox"/>
BMRA <input checked="" type="checkbox"/>	P <input type="checkbox"/>	Supplemental Agreements <input type="checkbox"/>
ECVAA <input checked="" type="checkbox"/>	Q <input checked="" type="checkbox"/>	Use of Interconnector Agreement <input type="checkbox"/>
CDCA <input type="checkbox"/>	R <input type="checkbox"/>	BSCCo
TAA <input type="checkbox"/>	S <input type="checkbox"/>	Internal Working Procedures <input checked="" type="checkbox"/>
CRA <input type="checkbox"/>	T <input type="checkbox"/>	BSC Panel/Panel Committees
SVAA <input type="checkbox"/>	U <input type="checkbox"/>	Working Practices <input type="checkbox"/>
Teleswitch Agent <input type="checkbox"/>	V <input type="checkbox"/>	Other
BSC Auditor <input type="checkbox"/>	W <input type="checkbox"/>	Market Index Data Provider <input type="checkbox"/>
Profile Administrator <input type="checkbox"/>	X <input type="checkbox"/>	Market Index Definition Statement <input type="checkbox"/>
Certification Agent <input type="checkbox"/>		System Operator-Transmission Owner Code <input type="checkbox"/>
Other Agents		
Supplier Meter Registration Agent <input type="checkbox"/>		Transmission Licence <input type="checkbox"/>
Unmetered Supplies Operator <input type="checkbox"/>		
Data Transfer Service Provider <input type="checkbox"/>		

1 DESCRIPTION OF PROPOSED MODIFICATION

1.1 Background

Section M of the Code concerns Credit Cover and Credit Default. Section M1.2 concerns Energy Indebtedness, and contains provisions for the calculation of Credit Assessment Energy Indebtedness (CEI) for different BM Unit types. The calculation for CEI for all types BM Units is:

$$CEI_{pj} = - \left(\sum_{a,i} CAQCE_{iaj} - \sum_a QABC_{aj} \right)$$

Where CAQCE is the Credit Assessment Credited Energy Volume and QABC is Account Bilateral Contract Volume. CAQCE is determined differently for each BM Unit type:

- For Production BM Units that are not Interconnector BM Units, BM Unit Credit Assessment Export Capability (BMCAEC) is a primary parameter in the calculation of CAQCE;
- For Consumption BM Units that are not Interconnector BM Units, BM Unit Credit Assessment Import Capability (BMCAIC) is a primary parameter in the calculation of CAQCE; and
- For Interconnector BM Units Final Physical Notification (FPN) is a primary factor in CAQCE.

Section M1.6 concerns Import and Export Capabilities, and contains the provisions for calculating BMCAEC and BMCAIC. BMCAEC, for Production BM Units, is calculated using the applicable Credit Assessment Load Factor (CALF) and Generation Capacity (GC) of the BM Unit. BMCAIC, for Consumption BM Units, is calculated using the applicable CALF and the Demand Capacity (DC) of the BM Unit. The calculations are:

- $BMCAEC_i = CALF_i * GC_i$
- $BMCAIC_i = CALF_i * DC_i$

Where the subscript 'i' denotes the BM Unit.

Approved Modification P140 'Revised Credit Cover Methodology for Interconnector BM Units' changed the provisions of Section M of the Code to introduce the use of FPN to calculate CEI for Interconnector BM Units, as described above. Prior to P140, CEI for Interconnector BM Units was calculated using BMCAEC and BMCAIC, in a similar manner to Production and Consumption BM Units.

CALF methodologies seek to make the BMCAIC and BMCAEC values equivalent to the average load of a BM Unit during a defined period (usually the equivalent season of the preceding year). Therefore a BM Unit's CEI reflects its deviation from its historical load pattern. P140 contended that historical behaviour is not an accurate guide to current and future trading activity for Interconnector BM Units, and that this may cause considerable difference between CAQCE and QABC values. It was argued that such differences result in large CEI values (positive or negative) which are not an accurate reflection of potential liabilities, in terms of future Trading Charges, of Interconnector Users.

It was argued that this inaccuracy led to Interconnector Users needing to lodge excessive amounts of Credit Cover to address periods of peak positive CEI, and to Interconnector Users having to monitor their Credit Cover position with extreme frequency.

It was noted in support of P140 that FPN values are considered to be deemed Metered Volumes for Interconnector BM Units, and will only fail to be met in instances where there is Interconnector technical failure; such failures are infrequent. It was not proposed as part of P140 that consideration be given to the application of a different methodology in calculating CEI for other BM Unit types.

As part of the assessment of Modification P200 'Introduction of a Zonal Transmission Losses Scheme with Transitional Scheme' the Modification Group considered how 'generator' BM Units could be defined. The P200 Group found it difficult to produce a fixed definition because the factors involved were all variable:

- BM unit Metered Volume (QM) is the most straightforward quantity that defines whether a BM Unit is generating or consuming, but it can vary between positive and negative for a given BM Unit over a period of time (also, BM Units that might be considered 'generators', such as embedded generation and pumped storage plant, can be net consumers of Metered Volumes over a given period);
- GC and DC are calculated on the basis of Parties' estimates of QM for each BM Unit for each BSC Season, and the value of GC and DC for a BM Unit, and hence which is its relevant quantity, can vary depending on the operation of the BM Unit;
- Production/Consumption (P/C) Status is determined using GC and DC values of BM Units, but this is done at a Trading Unit level and is redetermined when a BM Unit joins or leaves the Trading Unit;
- Exempt Export BM Units may choose their P/C Status; and
- The terms 'delivering' and 'offtaking' are used to describe Trading Unit behaviour on the basis of summed QM for a Settlement period, and are therefore similarly variable to QM, and are used at a Trading Unit level.

Due to the nature of P200, the Group were able to use a definition of 'generator BM Unit' that was based on historical net QM, i.e. whether the BM Unit had a net annual $QM > 0$ over a given period.

1.2 Modification Proposal

P215 was raised on 27 July 2007 by Uskmouth Power Limited ('the Proposer'). P215 seeks to revise the provisions regarding Credit Cover in the Balancing and Settlement Code ('the Code'). The revisions would be to the method of calculating Credit Cover with regard to generating BM Units, with the intent that the accuracy of the calculations would be increased and consequently the amount of credit that Parties are required to lodge would be based on more accurate data than at present.

P215 proposes to modify section M1.2 of the Code, concerning Energy Indebtedness, in relation to generating BM Units. It is intended that the definition of which BM Units this change would apply to, i.e. what constitutes a 'generating BM Unit', will be defined during the modification process. The specific change proposed is that BMCAEC is replaced with FPN in the calculations in M1.2 used to calculate Parties' CEI.

At present BMCAEC is used in the calculation of CAQCE for Production BM Units that are not Interconnector BM Units, and CAQCE is used in the calculation of CEI, as described above.

As noted, it is the intent of P215 that a definition of 'generating BM Units' (i.e. the BM Units to which the change proposed by P215 would apply) would be defined during the Modification process. During the Assessment of P200 a similar definition was attempted, and proved difficult. For the purposes of P200, a definition based on historical net QM value was possible. However, it appears unlikely that a similar approach could serve for P215. As there appears to be no static indicator of 'generator BM Unit' status, the possibility of using a dynamic definition (possibly based on QM in a given Settlement Period) might have to be explored, which could present process and system issues.

The Proposer believes that the use of FPN in the determination of Credit Cover for generating BM Units would allow more accurate calculation of the Credit Cover required, and that this would result in those generating BM Units being required to lodge a more appropriate amount of Credit Cover and the risks posed to that market being more accurately reflected than at present.

The Proposer contends that amending the Credit Cover methodology for generating BM Units as proposed by P215 would remove an unnecessary financial burden being placed on current and potential new Parties that have generating BM Units. This would be achieved by removing the need for generating BM Units to post excessive Credit Cover on the basis of inaccurate determination of the energy indebtedness. The Proposer also asserts that as well as reducing costs, the use of FPN as a parameter in Credit Cover calculation will better reflect the trading risk posed by the Parties.

The change proposed is limited to generating BM Units only, because FPN data is available close to real time only for generating BM Units. The proposal seeks to use the available FPN data to prevent excess credit being requested, and thus increase efficiency. The Proposer recognises that P215 would create a difference between the treatment of generating BM Units and Supplier BM Units in relation to the calculation of Credit Cover, but contends that this is simply due to the lack of real time data for Supplier BM Units. The Proposer asserts that P215 attempts to make better use of the available data and therefore should not be considered discriminatory.

2 AREAS FOR CONSIDERATION IN PROGRESSING MODIFICATION PROPOSAL

An initial assessment of P215 has identified the following areas which BSCCo recommends should be considered further during the progression of the Modification Proposal. In order to better define those areas for assessment it is proposed that a clear understanding of what constitutes a 'generating BM Unit' is required. As noted, a similar concept was discussed, but not satisfactorily concluded, under P200. BSCCo therefore recommends that to scope the areas for assessment the following issue should be considered in the Definition Procedure:

- Definition of a generating BM Unit.

BSCCo recommends the following areas should be considered in the Assessment Procedure:

- Potential discrimination between generating and consuming BM Units;
- Any relevant precedents from P140 and the interconnector use of FPN in CEI calculation;
- Any consequential impact of using FPN instead of CALF and GC/DC on the BSC or other Codes;
- Whether submission of FPN would be mandated for all generating BM Units, and whether this would include BM Units with output < 50MW (and the impact of mandating for < 50MW);
- A default position for the P215 provisions if FPN is not submitted, e.g. for interconnectors the ECVAA system uses the latest available FPN in calculations and if no previous FPN exists for the BM Unit the FPN value defaults to zero;
- Whether there are any implications of using FPN data for a purposes other than it was originally intended, i.e. any impact of using FPN in the Credit Cover calculation in addition to it being used by the System Operator (SO), for instance would FPN become a more commercial parameter, and would this affect the SO's ability to balance the System.
- Impact on National Grid of additional FPN data (i.e. from < 50MW generators if FPN submission is mandatory, or optional but attractive);
- If the ECVAA needs to use data (e.g. QM) that it does not currently possess in order to determine a BM Unit's generating status, what will be the impact on other BSC Agents that would supply the data, e.g. the SAA; and
- Impact on Central Systems.

3 RATIONALE FOR BSCCO'S RECOMMENDATIONS TO THE PANEL

BSCCo believes that further definition of the first area raised by this IWA, namely the definition of a generating BM Unit, is required before the Modification Proposal can be fully assessed. BSCCo therefore recommends that P215 proceed to the Definition Procedure.

BSCCo recommends that P215 be submitted to a one month Definition Procedure.

It is estimated that progression of P215 through the Definition Procedure will require:

- 1 Modification Group meeting; and
- 1 industry consultation.

The proposed timetable and estimated costs for the progression of P215 are shown in Appendix 3.

BSCCo recommends that the P215 Modification Group be formed from members of the Settlement Standing Modification Group, whose areas of expertise include Credit Cover arrangements, BM Unit Classification and Central Volume Allocation (CVA).

BSCCo recommends that the areas for consideration raised by this IWA should form the basis of the Modification Group Terms of Reference, along with any additional areas proposed by the Panel.

4 TERMS USED IN THIS DOCUMENT

Other acronyms and defined terms take the meanings defined in Section X of the Code.

Acronym/Term	Definition
CEI	Credit Assessment Energy Indebtedness
CAQCE	Credit Assessment Credited Energy Volume
QABC	Account Bilateral Contract Volume
BMCAEC	BM Unit Credit Assessment Export Capability
BMCAIC	BM Unit Credit Assessment Import Capability
FPN	Final Physical Notification
CALF	Credit Assessment Load Factor
GC	Generation Capacity
DC	Demand Capacity
QM	BM unit Metered Volume
P/C	Production/Consumption
CVA	Central Volume Allocation

5 DOCUMENT CONTROL

5.1 Authorities

Version	Date	Author	Reviewer	Reason for Review
0.1	02/08/07	Dean Riddell	David Jones	For peer review
0.2	02/08/07	Dean Riddell	C. Rowell, S. Francis	For technical review
0.3	02/08/07	Dean Riddell		For quality review
1.0	dd/mm/yy	Change Delivery		For Panel decision

5.2 References

Ref.	Document Title	Owner	Issue Date	Version
1	Modification Proposal P215		27/07/07	
2	Modification Proposal P200			
3	Approved Modification Proposal P140			

APPENDIX 1: MODIFICATION PROPOSAL

Modification Proposal – BSCP40/03	MP No: 215 <i>(mandatory by BSCCo)</i>
Title of Modification Proposal <i>(mandatory by originator)</i> : Revised Credit Cover Methodology for Generating BM Units.	
Submission Date <i>(mandatory by originator)</i> : 27 July 2007	
Description of Proposed Modification <i>(mandatory by originator)</i> The proposal is to modify Section M1.2 of the BSC for generating BM Units (where the definition of which BM Units this applies to should be defined during the modification process), replacing the BMCAEC of the CAQCE in the calculation of Credit Assessment Energy Indebtedness (CEI) with Final Physical Notification (FPN).	
Description of Issue or Defect that Modification Proposal Seeks to Address <i>(mandatory by originator)</i> <p>The modification seeks to address the way in which the CEI is calculated for generating BM Units. At present, the CEI is calculated for each Trading party using an estimate of the BM Unit generation or demand, as attributable to the Party's Energy Accounts and compared with the Party's contracted volume. For example, for generating BM Units, this estimate of generation is based on a Seasonal estimate; GC (maximum generation for the relevant BSC Season as notified by the Party) times CALF (calculated for the BSC Season using the previous year's load factor across the equivalent BSC Season), and therefore has little relevance to current or future trading activity.</p> <p>The proposal would replace the BMCAEC element of the Credit Assessment Credited Energy Volume (CAQCE) with the generating BM Unit's FPN. This may be considered more accurate, as historic performance and GC/DC values that are submitted for a 3 month period may bear little relation to what a particular generating BM Unit might be currently producing.</p> <p>The proposal seeks to use FPN to determine the credit cover required by a generating BM Unit thus allowing an accurate calculation, at the appropriate level that reflects the risks posed to that market than at present, through GC/DC and CALF values.</p> <p>The proposal has been limited to the category of generating BM Units on the basis of only FPN data being available for generating BM Units close to real time. The proposal seeks to use the FPN data that is available for generating BM Units to prevent excess credit being requested, via the current methodology of GC and CALF values, thus creating greater efficiency. We recognise that this proposal creates a difference in the way in which the credit requirement methodology is calculated for generating BM Units compared to supplier BM Units; however this is due to the lack of real time data being available for supplier BM Units. The proposal attempts to make better use of the available data and therefore should not be considered discriminatory. Uskmouth believes that more accurate credit cover calculations may be possible for other BM units, but this proposal does not seek to address all credit cover calculations.</p>	

Modification Proposal – BSCP40/03	MP No: 215 <i>(mandatory by BSCCo)</i>
Impact on Code <i>(optional by originator)</i> The proposal seeks the amendment of Para 1.2 of Section M of the BSC to include special provisions for generating BM Units and the consequent changes to be made to the CALF Guidelines.	
Impact on Core Industry Documents or System Operator-Transmission Owner Code <i>(optional by originator)</i>	
Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties <i>(optional by originator)</i> The CEI calculation would need to pick up the FPN data for each generating BM Unit, rather than the relevant GC/DC and CALF values.	
Impact on other Configurable Items <i>(optional by originator)</i>	
Justification for Proposed Modification with Reference to Applicable BSC Objectives <i>(mandatory by originator)</i> The need for lodging funds to cover the potential risks to the market is understood and accepted. The defect arises as the BSC calculations give an inaccurate reflection of a Party's activity and the associated risk they pose to the market. Furthermore the current calculation results in "excess credit" being lodged, at a cost to the industry which is ultimately born by customers. By amending the current credit cover methodology for generating BM Units, it would remove a financial burden being placed on current and potential new Parties that have generating BM Units, through avoiding credit cover being posted for an inaccurate determination of the indebtedness. As well as reducing costs, the use of FPN as a parameter in the CEI part of the credit cover calculation will better reflect the trading risk posed by the Parties. For these reasons, Uskmouth Power believes that this modification would better meet Applicable BSC Objectives (c), the promotion of 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. The proposed solution will ensure that generating BM Unit's energy indebtedness is more accurately calculated and all party risks better managed. This will ensure the posting of a representative amount of credit cover, at an economically efficient level to meet the desired objective of the BSC credit cover arrangements, i.e. to cover all party risk while not incurring excessive costs. This should reduce barriers to entry and thereby encourage competition in the sale and generation of electricity. Applicable BSC Objectives (d), the promotion of efficiency in the implementation and administration of the balancing and settlement arrangements, is also achieved through a reduction in effort required by BSCCo to handle CALF issues such as seasonal calculation and appeals processes. It is also more efficient for the market as a whole to have arrangements that achieve the "right" level of credit cover to manage the risk.	
Urgency Recommended: No <i>(delete as appropriate) (optional by originator)</i>	

Modification Proposal – BSCP40/03	MP No: 215 <i>(mandatory by BSCCo)</i>
Justification for Urgency Recommendation <i>(mandatory by originator if recommending progression as an Urgent Modification Proposal)</i>	
Details of Proposer:	
<i>Name... Rebecca Williams.....</i>	
<i>Organisation... Uskmouth Power Limited.....</i>	
<i>Telephone Number... 020 7659 6626.....</i>	
<i>Email Address... rebecca.williams@uskmouthpower.com.....</i>	
Details of Proposer’s Representative:	
<i>Name... Rekha Patel.....</i>	
<i>Organisation... Waters Wye Associates.....</i>	
<i>Telephone Number... 020 8286 2784.....</i>	
<i>Email address... rekha@waterswye.co.uk</i>	
Details of Representative’s Alternate:	
<i>Name...</i>	
<i>Organisation...</i>	
<i>Telephone Number.....</i>	
<i>Email address...</i>	
Attachments: No <i>(delete as appropriate) (mandatory by originator)</i>	
If Yes, Title and No. of Pages of Each Attachment:	

APPENDIX 2: INITIAL ASSESSMENT OF IMPACTS OF MODIFICATION PROPOSAL

An initial assessment has been undertaken by BSCCo in respect of all BSC systems, documentation and processes. The following have been identified as being potentially impacted by P215.

a) Impact on BSC Systems and Processes

BSC System / Process	Potential Impact of Proposed Modification
ECVAA System	The ECVAA system currently uses FPN data only in Credit Checking

BSC System / Process	Potential Impact of Proposed Modification
	for Interconnector BM Units: potential impact on software, CSDs, other configurable items
BMRA System	Should not be substantial impact if systems operate as currently understood: check for possible impact on CSDs and other configurable items
NGT System	Should not be substantial impact if systems operate as currently understood: check for possible impact on software, CSDs and other configurable items. (important as TC would supply FPN data)

b) Impact on BSC Agent Contractual Arrangements

No impact identified.

c) Impact on BSC Parties and Party Agents

Generators and, depending on the scope of P215 Licence Exemptable Generators, would be impacted (i.e. depending on what falls under the definition of 'generating BM Unit').

The Credit Cover methodology applied to those Parties impacted would be changed, as proposed by P215, with a consequent effect on the amount of Credit Cover they need to lodge. There may be an impact on Parties submission of FPNs, particularly if a change affected Parties for which at the moment submission of FPNs is not mandatory; if there was a requirement or an incentive for these Parties to submit FPNs, changes to their processes and systems might be needed.

No impact on BSC Party Agents identified.

d) Impact on Transmission Company

The Transmission Company already supplies FPN information to the ECVAA (via the BMRA), which uses FPNs only in the area of Credit Checking for Interconnector BM Units. However, all other FPN information received from the Transmission Company, though not used in any subsequent calculations, is loaded into the ECVAA system. Therefore, there should be no impact in this respect, though as ECVAA would be relying on the Transmission Company to supply FPN data, this must be confirmed.

It is possible that the Transmission Company may have to handle an increased amount of FPN data if a requirement is introduced for FPN submission by generators with output < 50MW (or if submission by such generators remains optional but there is an incentive for them to submit FPNs). The impact of this possibility may need to be assessed.

e) Impact on BSCCo

Area of Business	Potential Impact of Proposed Modification
Change Implementation	Implementation of changes to configurable items and other system documentation. Management of solution development and arranging participant testing, in conjunction with the ECVAA service provider.
CVA Data/Operations	Amendment of guidance documentation, information sheets, LWIs. Provide information for Trading Operations Report, provide support to Industry on the new methodology. Train staff in the new methodology, support implementation.
Corporate Services	Support implementation – assurance, audit software development.
Legal	Support assessment and implementation.

f) Impact on Code

Code Section	Potential Impact of Proposed Modification
Section M	M1.2.3 changed in accordance with P215.
Section Q	Contains the provisions for submissions of FPNs; if any change was made to the requirements around submission of FPNs for generators with output < 50MW, section Q would be impacted.

g) Impact on Code Subsidiary Documents

Document	Potential Impact of Proposed Modification
ECVAA Service Description	Add the new algorithm for the calculation of CEI for Generating BMUs from the FPN (and for calculating the total CEI for a Party). Amend the ECVAA-I014.
CVA Data Catalogue	Amend the ECVAA-I014.
BMRA Service Description	Possible impact, dependent on current system operation.

h) Impact on Core Industry Documents and Other Documents

Document	Potential Impact of Proposed Modification
Grid Code	Contains requirements for FPN submission; any change was made to BSC section Q would need to be reflected in the Grid Code (i.e. if any change was made to the requirements around submission of FPNs for generators with output < 50MW).

i) Impact on Other Configurable Items

Document	Potential Impact of Proposed Modification
Logica IDD part 1	Amend the ECVAA-I014.
BMRA URS	Possible impact, dependent on current system operation.

j) Impact on BSCo Memorandum and Articles of Association

No impact identified.

k) Impact on Governance and Regulatory Framework

No impact identified.

APPENDIX 3: COSTS AND TIMETABLE FOR PROGRESSION

ESTIMATED COSTS OF PROGRESSING MODIFICATION PROPOSAL³

Please note: these costs are for the Definition Procedure only. The extent of the Assessment Procedure required will be dependent on the conclusions within the Definition Report. An estimation of the costs required to progress P215 through Assessment will be provided at the conclusion of the Definition Phase.

Meeting Cost	£500
Legal/Expert Cost	£0
Impact Assessment Cost	£0
ELEXON Resource	19 man days £3660

³ Clarification of the meanings of the cost terms in this appendix can be found on the BSC Website at the following link:
http://www.elexon.co.uk/documents/Change_and_Implementation/Modifications_Process_-_Related_Documents/Clarification_of_Costs_in_Modification_Procedure_Reports.pdf

