

<b>Meeting name</b>	Panel
<b>Date of meeting</b>	14 March 2007
<b>Paper title</b>	Changes to BSCP71 arising from Modification Proposal P210
<b>Purpose of paper</b>	For Decision
<b>Synopsis</b>	This paper seeks conditional Panel approval for the changes to BSCP71 that have been identified as being necessary should Modification Proposal P210 be approved. The Panel are asked to note the process followed and conditionally approve the changes to be implemented coincident with P210.

## **1 Introduction**

- 1.1 Modification Proposal P210 'Revisions to the Text in Section P related to Single Notifications of Energy Contract Volumes and Metered Volume Reallocations' was raised by the BSC Panel on 5 February 2007.
- 1.2 As part of the Terms of Reference for the P210 Modification Group (the Group) the Panel asked the Group to consider 'whether any changes are required to the Code subsidiary documents'.

## **2 Discussions of the Modification Group<sup>1</sup>**

- 2.1 At its first meeting the Group agreed by majority that, whilst the proposed changes in the Code were sufficient to resolve the immediate issue, there should be additional supporting information relating to the submission and processing of notifications within the Code Subsidiary Document. The Group agreed that the current Code reference to BSCP01 'Overview of Trading Arrangements' was not useful and neither was BSCP01 the most appropriate BSCP for this information. The Group discussed the potential for a new BSCP but was mindful of the processes required to set up a new BSCP. The Group agreed that the BSCP changes should be made concurrent with the Code changes, such that the reference in the Code to the BSCP did not remain superfluous or did not refer to a BSCP where there was no additional useful information. The Group therefore agreed that, under the circumstances it was appropriate that the changes should be included within BSCP71 'ECVNA and MVRNA Registration, Authorisation and Termination', as it already covered a number of activities required to support the submission of notifications.
- 2.2 In order to ensure that the revisions to BSCP71 were comprehensive and recognising the limited time available to draft the changes, the Group agreed that a redlined version of BSCP71 be made available for consultation in the week following the issue of the P210 Modification consultation.
- 2.3 The ISG are normally the approvers of changes to BSCP71 and it was agreed that this would not be appropriate given the dependency on P210. Instead the ISG (several of whom were also P210 Modification Group members) would be informed of the proposed approach to the implementation approach for BSCP71 changes arising from P210. The ISG Chair communicated this approach to the ISG at its meeting on 20 February 2007.

---

<sup>1</sup> Full details of the Modification Group discussions and consultation responses can be found in the P210 Modification Report and its Attachments.

- 2.4 The Group also asked ELEXON to consider a guidance note on notifications, which it was felt was especially important for new entrants. ELEXON confirmed that its operational teams were currently working on a guidance note. At the second meeting of the P210 Modification Group it was requested that the guidance note should contain information on the impact of a Party being in Credit Default on the processing of notifications. ELEXON agreed to include this information. The guidance note will be available in the near future.

### 3 Process Followed

- 3.1 The processes for the modification of Code Subsidiary Documents are detailed in Section F.3 of the Code.
- 3.2 Paragraph 3.2 states that 'The Panel shall, prior to making any modification to a Code Subsidiary Document ..., consult with Parties and interested third parties in such manner as it considers appropriate, in the light of the complexity, importance and urgency of the proposed change and shall have regard to any representations made and not withdrawn during such consultation.'
- 3.3 The draft BSCP71 changes were published to the same, full, list of recipients of Change Process documentation as they would have been if the changes were being progressed and agreed by the normal BSCP40 processes. Additionally the change circular went to the Modifications consultations recipients. The BSCP71 changes were issued for industry consultation on 21 February 2007 in Change circular CPC00598, the circular stated clearly that the proposed changes were being progressed as part of P210 and would be implemented coincident with the P210 implementation date (this was reiterated from the original P210 consultation document issued on 15 March 2007), if approved. Recipients were provided with five Working Days to provide comments.
- 3.4 Five consultation responses were received by the consultation deadline and one late response was received. The responses are summarised below:

Q	Consultation question	Yes	No	Neutral
1.	Do you agree with the changes to BSCP71?	5 (30 + 0)	0	1 (0 + 1)
2.	Do you believe the changes reflect the requirements of the modification as detailed in the P210 Urgent Consultation document?	5 (30 + 0)	0	1 (1 + 1)
3.	Do you have any review comments?	1 (5 + 0)	5 (25 + 1)	0
4.	Do you support this BSCP being implemented concurrently with Proposed Modification P210 as preferred by the Modification Group?	5 (30 + 0)	0	1 (0 + 1)

- 3.5 One respondent was neutral on the changes and support for the BSCP as it did not impact them.
- 3.6 All other respondents agreed with the changes, agreed the changes reflected the requirements of P210 and supported the provisional implementation of the changes to BSCP71, subject to the approval of P210.
- 3.7 The late response contained a number of suggested improvements which were discussed by the Modification Group on 2 March. The suggestions and discussion are detailed in section 2.3.2 of the P210 Modification Report.
- 3.8 BSCP71 was revised to incorporate the changes agreed by the Group and sent to the industry and the Modification Group (along with the draft Modification Report) for final comments on 5 March

2007 via CPC00601. Recipients were asked if they agreed with the further changes to BSCP71 with responses due by 9 March 2007.

- 3.9 Four responses were received, representing 22 Parties and 1 Party Agent. One respondent remained neutral on the changes, the three remaining respondent agreed with the further BSCP changes. No further points were raised.
- 3.10 The final draft changes to BSCP71 are included as Attachment 2 to the draft Modification Report.

## **4 Next Steps**

- 4.1 The Panel are asked to note the process followed and authorise the changes to BSCP71 to be conditional on the approval and concurrent with the implementation of P210 (Proposed or Alternative).
- 4.2 The Authority do not authorise changes to Code Subsidiary Documents, therefore the Panel will not be asking the Authority to make a decision on the BSCP71 changes as part of P210 but will note that the changes to BSCP71, if agreed by the Panel, are subject to the approval of P210. Should P210 not be approved then these changes to BSCP71 will not be sought.

## **5 Recommendations**

- 5.1 The Panel is invited to:
- a) NOTE the process followed for the changes to BSCP71 to support P210; and
  - b) AUTHORISE the changes to BSCP71 to be made concurrently with the implementation of P210, and SUBJECT TO Authority approval of P210 (Proposed or Alternative); and
  - c) NOTE to the Authority, in the Modification Report, the authorisation of the changes to BSCP71, subject to P210 approval.

**Chris Rowell**

**Modifications Secretary**