

Draft MODIFICATION REPORT for Modification Proposal P209 'Housekeeping Modification - Change of Code References from BSCP531 to BSCP537'

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

Proposed Modification P209 seeks to deliver a minor referencing change to the Code (as modified via Approved Modification P197 'SVA Qualification Processes review') from BSCP531 to BSCP537. This will remove an existing ambiguity from the Code as the P197 Qualification arrangements are described in the new BSCP537, not BSCP531 which is currently quoted in the Code. P209 has been raised by the Panel in accordance with paragraph F2.1.1(d)(iv) of the Code.

No Alternative Modification has been developed.

BSC PANEL'S RECOMMENDATIONS

Having considered and taken into due account the contents of the P209 draft Modification Report, the BSC Panel recommends:

- **that Proposed Modification P209 should be made;**
- **an Implementation Date for Proposed Modification P209 of 23 August 2007 if an Authority decision is received on or before 9 August 2007, or 10 Working Days after an Authority decision if it is received after 9 August 2007;**
- **the proposed text for modifying the Code, as set out in the draft Modification Report.**

¹ ELEXON Ltd fulfils the role of the Balancing and Settlement Code Company ('BSCCo').

² The current version of the Code can be found at <http://www.elexon.co.uk/bcsrelateddocs/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 would be impacted by P209.

Please note that this table represents a summary of the full impact assessment results contained in Appendix 3.

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 type="checkbox"/>	B <input type="checkbox"/>	Codes of Practice <input type="checkbox"/>
Interconnectors <input type="checkbox"/>	C <input type="checkbox"/>	BSC Service Descriptions <input type="checkbox"/>
Licence Exemptable Generators <input 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 type="checkbox"/>
Suppliers <input type="checkbox"/>	F <input type="checkbox"/>	Communication Requirements Documents <input type="checkbox"/>
Transmission Company <input 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 checked="" type="checkbox"/>	British Grid Systems Agreement <input type="checkbox"/>
Meter Operator Agents <input type="checkbox"/>	K <input checked="" 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 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 type="checkbox"/>
FAA <input type="checkbox"/>	O <input type="checkbox"/>	Master Registration Agreement <input type="checkbox"/>
BMRA <input type="checkbox"/>	P <input type="checkbox"/>	Supplemental Agreements <input type="checkbox"/>
ECVAA <input type="checkbox"/>	Q <input type="checkbox"/>	Use of Interconnector Agreement <input type="checkbox"/>
CDCA <input type="checkbox"/>	R <input type="checkbox"/>	BSCCo
TAA <input type="checkbox"/>	S <input checked="" type="checkbox"/>	Internal Working Procedures <input 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 checked="" 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 MODIFICATION

For a full description of the original Modification Proposal as submitted by The Panel ('the Proposer'), and the background to the proposal, please refer to the P209 Initial Written Assessment (IWA).

1.1 Proposed Modification

P209 was raised by the BSC Panel ('the Panel') at the Panel meeting held on 11 January 2007, following its agreement with the recommendation of BSCCo that a Modification Proposal be raised. The Panel noted that paragraph F2.1.1(d)(iv) of the Balancing and Settlement Code ('the Code') allows the Panel to raise a Modification Proposal on the recommendation of BSCCo to rectify manifest errors, to correct minor inconsistencies and/or to make other minor consequential changes to the Code. Such Modification Proposals are often referred to as 'housekeeping' modifications. The Panel agreed with the view of BSCCo that the proposed changes were of a minor consequential nature, and that its recommendation to the Authority would therefore generally be considered to be self-evident. It therefore agreed that P209 should be progressed directly to the Report Phase in accordance with paragraph F2.2.4 of the Code.

P209 seeks to make a minor consequential change to the current Code baseline, as modified by P197, by replacing all BSCP531 references to BSCP537. The full legal text to deliver the changes is provided as Attachment 1 to this report.

2 IMPLEMENTATION APPROACH AND COSTS

PROPOSED MODIFICATION IMPLEMENTATION COSTS³

		Stand Alone Cost	Incremental Cost	Tolerance
Total Demand Led Implementation Cost		Nil	Nil	N/A
ELEXON Implementation Resource Cost		2 man days £480	2 man days £480	+/- 5%
Total Implementation Cost		£480	£480	+/- 5%

PROPOSED MODIFICATION ONGOING SUPPORT AND MAINTENANCE COSTS

		Stand Alone Cost	Incremental Cost	Tolerance
Service Provider Operation Cost		Nil	Nil	N/A

³ An explanation of the cost terms used in this section 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

Service Provider Maintenance Cost	Nil	Nil	N/A
ELEXON Operational Cost	Nil	Nil	N/A

a) BSC Agent Impact

P209 has no impact on any BSC Agents.

b) BSC Party and Party Agent Impact

P209 has no impact on BSC Parties or Party Agents, since the changes are non-material and do not alter the obligations set out in the Code.

c) Transmission Company Impact

P209 has no impact on the Transmission Company.

d) BSCCo Impact

P209 would be a Code-only change, and the majority of the estimated implementation costs comprise the effort required to amend the Code.

3 RATIONALE FOR PANEL'S RECOMMENDATIONS TO THE AUTHORITY

3.1 Panel's Consideration of IWA

The Panel considered the P209 IWA at its meeting on 11 January 2007. This section summarises the Panel's discussions in formulating its provisional recommendation for inclusion in the draft Modification Report. Details of the Report Phase consultation responses, the Panel's discussion of the responses and its final recommendation to the Authority can be found in Sections 3.2, 3.3 and 3.4 respectively.

3.1.2 Applicable BSC Objectives

Consistent with previous housekeeping modifications, BSCCo recommended that the changes outlined in P209 are self-evident and that P209 would therefore better facilitate the achievement of **Applicable BSC Objective (d)** 'promoting efficiency in the implementation and administration of the balancing and settlement arrangements', by improving the clarity of the Code around the Qualification processes and reducing any potential for misunderstanding by Parties (particularly for new entrants to the market).

The Panel agreed that the proposed housekeeping changes appeared to be self-evident, and therefore agreed a unanimous provisional recommendation to the Authority that the Proposed Modification should be made.

3.1.3 Implementation Date

The Panel provisionally agreed with the IWA's recommendation regarding the following Implementation Dates for P209:

- 23 August 2007 if an Authority decision is received on or before 9 August 2007; or
- 10 Working Days after an Authority decision if received after 9 August 2007.

3.1.4 Legal Text

The Panel reviewed the draft text and provisionally agreed that it addresses the defect identified by the Modification Proposal.

3.2 Results of Report Phase Consultation

This section to be completed following the Report Phase consultation

3.3 Panel's Consideration of Draft Modification Report

This section to be completed following the Panel meeting at which the draft Modification Report and Report Phase consultation responses are considered.

3.4 Panel's Final Recommendation to the Authority

This section to be completed following the Panel meeting at which the draft Modification Report and Report Phase consultation responses are considered.

4 TERMS USED IN THIS DOCUMENT

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

Acronym/Term	Definition
BSCCo	Balancing and Settlement Code Company
BSCP	Balancing and Settlement Code Procedure
Code	The Balancing and Settlement Code
CVA	Central Volume Allocation
Housekeeping modification	A Modification Proposal raised by the Panel on the recommendation of BSCCo in accordance with paragraph F2.1.1 of the Code, in order to correct minor errors and inconsistencies in the Code.
MOA	Meter Operation Agent
SVA	Supplier Volume Allocation

5 DOCUMENT CONTROL

5.1 Authorities

Version	Date	Author	Reviewer	Reason for Review
0.1	12/01/07	Chris Stewart	David Jones	For technical review
0.2	15/01/07	Chris Stewart	Ysanne Hills	For quality review
0.3	16/01/07	Chris Stewart	BSC Parties and other interested parties	For consultation
0.4	dd/mm/yy			For quality review
0.5	dd/mm/yy	Change Delivery	BSC Panel	For Panel decision
1.0	dd/mm/yy	BSC Panel		For Authority decision

APPENDIX 1: LEGAL TEXT

Draft legal text for the Proposed Modification is attached as a separate document, Attachment 1.

The draft legal text replaces the 32 BSCP531 references in Sections J, S, X-1 and Annex K-1 of the Code to BSCP537.

APPENDIX 2: PROCESS FOLLOWED

Copies of all documents referred to in the table below can be found on the BSC Website at: <http://www.elexon.co.uk/changeimplementation/ModificationProcess/ModificationDocumentation/modProposalView.aspx?propID=229>

Date	Event
11/01/07	Modification Proposal raised by The Panel
11/01/07	IWA presented to the Panel
16/01/07	Draft Modification Report issued for industry consultation

ESTIMATED COSTS OF PROGRESSING MODIFICATION PROPOSAL⁴

Meeting Cost	Nil
Legal/Expert Cost	Nil
Impact Assessment Cost	Nil
ELEXON Resource	4 man days £960

APPENDIX 3: RESULTS OF IMPACT ASSESSMENT

During the Report Phase an impact assessment was undertaken by BSCCo in respect of all BSC Systems, processes, documentation and parties. The following have been identified as impacted by P209.

For details of the costs associated with these impacts, please refer to Section 2.

a) Impact on BSC Systems and Processes

No Impact.

⁴ 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

b) Impact on BSC Agent Contractual Arrangements

No Impact.

c) Impact on BSC Parties and Party Agents

No Impact.

d) Impact on Transmission Company

No Impact

e) Impact on BSCCo

Area of Business	Impact of Proposed/Alternative Modification
Code administration/configuration	Minor impact to make the required 'housekeeping' changes to the text of the Code following approval of P209.

f) Impact on Code

With the implementation of Approved Modification P197 on 23 August 2007 there will be a total of 32 references to BSCP531 in the Code that need to be changed to BSCP537. These references are found in Section J, Annex K-1, Section S and Section X-1 of the Code.

A copy of the draft legal text to give effect to these changes can be found in Attachment 1.

g) Impact on Code Subsidiary Documents

Whilst there will be no impact from the Proposed Modification on the Code Subsidiary Documents, this Proposal is related to the new BSCP537 that was established by the Panel at its 11 January 2007 meeting.

h) Impact on Core Industry Documents/System Operator-Transmission Owner Code

No Impact

i) Impact on Other Configurable Items

No Impact

j) Impact on BSCCo Memorandum and Articles of Association

No Impact

k) Impact on Governance and Regulatory Framework

No Impact

APPENDIX 4: REPORT PHASE CONSULTATION RESPONSES

To be attached following Report Phase consultation