



MODIFICATION REPORT for Modification Proposal P168

'Publication of BMU GC and DC values on ELEXON website'

Prepared by: ELEXON on behalf of the BSC Panel

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This document has been distributed in accordance with Section F2.1.10¹ of the Balancing and Settlement Code.

RECOMMENDATIONS

Having considered and taken into due account the contents of the draft Modification Report, the Balancing and Settlement Code Panel ('the Panel') recommends:

- **that the Proposed Modification P168 should be made;**
- **the P168 Implementation Date of 10 Working Days after an Authority decision; and**
- **the proposed text for modifying the Code, as set out in the Modification Report.**

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¹ The current version of the Balancing and Settlement Code (the 'Code') can be found at [ELEXON - Balancing and Settlement Code \(BSC\) – Live Version](#)

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SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

The following parties/documents have been identified as impacted by Modification Proposal P168.

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

*P168 requires no changes to any systems or processes used by Parties. However, P168 impacts Parties to the extent that the GC and DC values for their BM Units would be made available to all interested parties via the BSC Website. Publication of GC and DC values may also aid Parties in carrying out certain activities, such as monitoring their submitted BM Unit Metered Volume estimates and undertaking market analysis.

1 DESCRIPTION OF PROPOSED MODIFICATION AND ASSESSMENT AGAINST THE APPLICABLE BSC OBJECTIVES

1.1 Modification Proposal

1.1.1 Aim of Modification Proposal

Modification Proposal P168 'Publication of BMU GC and DC values on ELEXON website' ('P168') was raised by SmartestEnergy Ltd ('the Proposer') on 27 July 2004.

P168 proposes that Generation Capacity (GC) and Demand Capacity (DC) values be published on the BSC (ELEXON) Website for all live BM Units. The Proposer argues that this data should be made available to participants in order to aid market analysis, and that its publication would further the openness and transparency of the electricity market.

The Proposer therefore believes that P168 would better facilitate Applicable BSC Objective (c):

'Promoting 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'.

GC and DC values for all live BM Units are currently received by BSCCo from the Central Registration Agent (CRA), via the CRA-I020 data flow (Operations Registration Report) sent to BSCCo's Trading Operations Market Analysis System (TOMAS). These values had previously been published by BSCCo on the BSC Website following NETA Go-Live, but were withdrawn in December 2003 following legal advice that the data falls within the category of Confidential Information under the Balancing and Settlement Code ('the Code') and may not be Disclosed by BSCCo.

P168 therefore seeks to reinstate GC and DC values on the BSC Website by modifying the Code in order to expressly allow for publication of this data.

For more detail regarding the Code's definition of Confidential Information, and the rules regarding its Disclosure, please refer to the P168 Assessment Report in Annex 3.

1.1.2 Process followed to date

The P168 Initial Written Assessment (IWA, Reference 1) was presented at the Panel Meeting held on 12 August 2004, where the Panel determined that P168 should be submitted to a one-month Assessment Procedure by a new Modification Group composed of members of the Governance, Settlement and Volume Allocation Standing Modification Groups. Details of the Group's membership can be found in Annex 2.

During the one-month Assessment timetable the P168 Modification Group (P168 MG) held two meetings, on 16 August and by teleconference on 1 September 2004. An England and Wales industry consultation was issued (Reference 2), and a summary of the responses received can be found in the P168 Assessment Report in Annex 3.

At its meeting on 2 September 2004, following BETTA Go-Active, the Panel agreed that the Assessment Procedure for P168 should be extended by one month in order that a GB consultation be undertaken by industry (Reference 3). Those participants who had previously responded to the England and Wales consultation were requested to resubmit their earlier responses only if they identified any additional GB issues.

No responses were received to the GB consultation. The Group held a further meeting on 22 September 2004 to undertake its evaluation of P168 in a GB context.

A summary of the P168 MG's discussions and recommendations can be found in Section 1.5, and more detail is contained in the P168 Assessment Report in Annex 3. The Group also commissioned impact assessments from BSCCo and the Transmission Company, and summaries of the impacts returned can be found in Sections 4, 5 and 7.

The P168 Assessment Report was presented to the Panel at its meeting of 14 October 2004, where the Panel unanimously agreed with the recommendation of the Group that P168 proceed to the Report Phase with a provisional recommendation that the Proposed Modification should be made.

Respondents to the P168 Report Phase consultation unanimously agreed with the provisional recommendations of the Panel. A summary of the responses can be found in Section 6, with full copies of these responses attached as Annex 4.

The Panel considered the P168 draft Modification Report (Reference 4) and these consultation responses at its meeting on 11 November 2004, and unanimously confirmed its recommendation that the Proposed Modification should be made.

Legal text has been provided in respect of the Proposed Modification, and is attached as Annex 1.

1.1.3 Interaction with Modification Proposal P169

Modification Proposal P169 'Publication of BMU names on ELEXON website' ('P169') was also raised by SmartestEnergy Ltd on 27 July 2004, and proposes that BM Unit names be published against the existing BM Unit IDs on the BSC (ELEXON) Website. Since the defects identified by P168 and P169 are similar, the Panel agreed that the two Proposals should be considered by the same Modification Group.

The Panel initially determined that the Proposals should be progressed separately under a one-month Assessment Procedure for P168 and a two-month Assessment Procedure for P169. The Panel requested that the P168 discussions focus only on developing the solution for publishing GC and DC values, with any broader issues relating to Confidential Information or data publication to be considered under P169. Although the Panel subsequently extended the P168 Assessment timetable by one month in order to undertake a GB-wide consultation, the two Proposals were still progressed separately by the Modification Group.

However, it should be noted that both the Modification Group and the Panel expressed a preference for the Alternative Modification P169, which proposes to publish all BM Unit registration data contained in the CRA-I020 flow (including GC and DC values) – and would therefore negate the need for P168.

For further information regarding P169, please refer to the P169 Modification Report (Reference 5).

1.2 Proposed Modification

The solution developed by the P168 MG is that GC and DC values should be extracted by BSCCo from its market monitoring TOMAS system and published as part of the existing 'Registered BMU' spreadsheet within the Central Registration Service (CRS) Registration Data section of the BSC Website. This spreadsheet contains the CRS registration data which BSCCo is required to publish on the BSC Website in accordance with paragraph V4.2.3 of the Code (currently all Party IDs, Party names and live BM Unit IDs). The Group agreed that the 'Registered BMU' spreadsheet should continue to be updated on its existing weekly basis.

The P168 MG noted that this solution would reinstate the format and frequency under which GC and DC values had previously been published prior to their withdrawal from the website.

The Group therefore agreed that V4.2.3 should be amended to add GC and DC values to the list of CRS registration data. Where data is published under Section V, such data is no longer regarded as Confidential Information.

1.3 Issues raised by the Proposed Modification

The following issues raised by the Proposed Modification P168 were considered by the P168 MG during the Assessment Procedure:

- Format and frequency of publication of GC and DC values;
- Consideration of GB-wide arrangements following BETTA Go-Active; and
- Consideration of the draft legal text.

For further details regarding these issues, please refer to the P168 Assessment Report in Annex 3.

1.4 Governance and regulatory framework assessment

During the Assessment Procedure the P168 MG discussed whether there were any wider common-law confidentiality rights which might override the provisions of the Code. The Group noted BSCCo's legal advice that, under the existing provisions of V1.3, Parties 'irrevocably and unconditionally' consent to publication of data on the BSC Website (as well as the use and Disclosure of that data by other Parties) where such data is published under paragraph V4 of the Code. The Group noted BSCCo's legal view that no additional confidentiality waiver by Parties would be required in respect of their GC and DC values – since this data would be published in accordance with paragraph V4 under the P168 legal text, and the views of Parties regarding its publication would have been sought during the P168 consultations.

1.5 Modification Group's assessment of how the Proposed Modification would better facilitate the Applicable BSC Objectives

The unanimous view of the P168 MG was that P168 should be made.

- The majority of the Group agreed that P168 would better facilitate Applicable BSC Objective (c), since publication of GC and DC values would promote the transparency of the market and thereby facilitate competition. These members agreed that publication of these values would help Parties to monitor their own data and undertake market analysis. These members also considered that lack of transparency of the data could potentially act as a barrier to participation in the market – particularly for smaller players and new entrants, who might not have the knowledge needed to derive the information from other existing sources.
- One member of the Group – while noting that there did not appear to be any downside to publishing GC and DC values – stated that they found it difficult to say whether this would better facilitate competition, since it was not clear how the data would be used by participants. However, this member agreed with the recommendation of the Group that P168 should be made, as they believed publication of the data to be in the interests of transparency and since the other members of the Group and respondents to the Assessment Consultation had indicated that they would find such data useful.

No members of the P168 MG or respondents to the Assessment Consultation identified any reason why GC and DC values should remain Confidential Information, or any loss which would result to the owners of BM Units from the publication of these values. The Group considered that the information could already be derived using existing available data, such as the Maximum Import Limit/Maximum Export Limit.

Although believing that P168 would better facilitate the achievement of the Applicable BSC Objectives, it should be noted that the Group (and the majority of respondents to the P169 Assessment Consultation) expressed a preference for the Alternative Modification P169, which would negate the need for P168 (see Section 1.1.3).

For more information regarding the views of the P168 MG and Assessment Consultation respondents, please refer to the P168 Assessment Report in Annex 3.

2 COSTS²

PROGRESSING MODIFICATION PROPOSAL

Demand Led Cost	£500
ELEXON Resource	35 man days £6,360

IMPLEMENTATION COSTS

		Stand Alone Cost	P168 Incremental Cost	Tolerance
Service Provider³ Cost				
	Change Specific Cost	0	0	N/A
	Release Cost	0		N/A
	Incremental Release Cost	0	0	N/A
	Total Service Provider Cost	0	0	N/A
Implementation Cost				
	External Audit	0	0	N/A
	Design Clarifications	0	0	N/A
	Additional Resource Costs	0	0	N/A
	Additional Testing and Audit Support Costs	0		N/A
Total Demand Led Implementation Cost		0	0	N/A

² Clarification of the meanings of the cost terms in this section can be found in Annex 5 of this report.

³ BSC Agent and non-BSC Agent Service Provider and software costs.

ELEXON Implementation Resource Cost		39 man days* £11,700*	9 man days* £2,700*	+/- 5%
Total Implementation Cost		£11,700	£2,700	+/- 5%

* The recommended Implementation Date for P168 is 10 Working Days following an Authority decision, with the Code and ELEXON reporting changes to take effect from this date. Although there is also a minor impact on the Reporting Catalogue, the recommendation of the Panel is that the Reporting Catalogue change be made at a later opportune date as part of a scheduled release in order to only incur the incremental cost shown above (see Section 9 for further details).

ONGOING SUPPORT AND MAINTENANCE COSTS

	Stand Alone Cost	P168 Incremental Cost	Tolerance
Service Provider Operation Cost	0	0	N/A
Service Provider Maintenance Cost	0	0	N/A
ELEXON Operational Cost	0	0	N/A

3 RATIONALE FOR PANEL'S RECOMMENDATIONS

The Panel considered the P168 Assessment Report at its meeting of 14 October 2004, and agreed the provisional recommendation that P168 should be made.

The Panel unanimously agreed with the view of the P168 MG that P168 would better facilitate the achievement of Applicable BSC Objective (c) for the reasons set out in Section 1.5 above.

The Panel noted that it was required by the Code to make separate recommendations in respect of each Modification Proposal, based on whether the individual Proposal would better facilitate the achievement of the Applicable BSC Objectives. The Panel therefore agreed the provisional recommendation that P168 should be made. However, the Panel requested that the Authority note its preference for the Alternative Modification P169, which the Panel believed would better facilitate the achievement of Applicable BSC Objective (c) and which would also remove the requirement for P168.

The Panel unanimously agreed with the Implementation Date and implementation approach proposed by the Group, and noted that it would be desirable for the Authority to make its decisions regarding P168 and P169 simultaneously (see Section 9).

The Panel's provisional recommendation was consulted upon as part of the P168 draft Modification Report. At its meeting of 11 November 2004 the Panel considered this report and the responses received to the consultation (see Section 6), and unanimously confirmed its recommendation that P168 should be made.

4 IMPACT ON BSC SYSTEMS AND PARTIES

During the Assessment Procedure, an assessment was undertaken in respect of BSC Systems and Parties. The following have been identified as impacted by P168.

4.1 BSCCo

The table below provides a summary of the effort required by BSCCo to support the implementation of P168. Full cost information can be found in Section 2 of this report.

BSCCo Function	Estimated Impact of P168
BSC Configuration Administration	2 man days' effort would be required to implement changes to Section V of the Code.
Market Monitoring	½ man day's effort would be required to add new 'GC' and 'DC' fields to the TOMAS manual report template used to produce the 'Registered BMU' spreadsheet.
BSC Website	½ man day's effort would be required to amend the existing explanatory text for the 'Registered BMU' spreadsheet on the CRS Registration Data page (Market Data section).
CVA Programme	5 man days' effort would be required to amend the Reporting Catalogue as part of a scheduled Release. Alternatively, 35 man days' effort would be required to amend the Reporting Catalogue as a stand-alone change.
Corporate Assurance	1 man day's effort would be required to provide assurance to the CVA Programme and amend BSCCo's Obligations Register.

4.2 BSC Systems

P168 has no impact upon any BSC Systems or BSC Agents.

4.3 Parties and Party Agents

P168 requires no changes to any systems or processes used by Parties. However, P168 impacts Parties to the extent that the GC and DC values for their BM Units would be made available to all interested parties via the BSC Website. Publication of GC and DC values may also aid Parties in carrying out certain activities, such as monitoring their own values and undertaking market analysis.

P168 has no impact on any Party Agents.

5 IMPACT ON CODE AND DOCUMENTATION

5.1 Balancing and Settlement Code

P168 would impact the following Code Sections:

Code Section	Proposed Changes
Section V 'Reporting'	Addition of GC and DC values to the CRS registration data set out in V4.2.3, in order to expressly allow these values to be published on the BSC Website.

5.2 Code Subsidiary Documents

P168 would impact the following Code Subsidiary Documents:

Document	Proposed Changes
Reporting Catalogue	Addition of GC and DC values to Section 8.1 'BSCCo Reports Published on BSC Website'.

5.3 BSCCo Memorandum and Articles of Association

No impact identified.

5.4 Impact on Core Industry Documents and supporting arrangements

No impact identified.

6 SUMMARY OF REPORT PHASE CONSULTATION RESPONSES

4 responses (representing 35 BSC Parties) were received to the P168 Report Phase consultation.

A summary of the consultation responses is provided below, with the Panel's discussions of these responses contained in Section 6.5. Full copies of the responses are attached as Annex 4.

	Consultation question	Yes	No	No comment
1.	Do you agree with the Panel's views regarding P168 and the provisional recommendation to the Authority contained in the draft Modification Report that P168 should be made?	4 (35)	0	0
2.	Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the defect or issue identified in the Modification Proposal?	3 (34)	0	1 (1)
3.	Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P168?	4 (35)	0	0
4.	Are there any further comments on P168 that you wish to make?	1 (10)	3 (25)	0

6.1 Panel's provisional recommendation

All respondents to the Report Phase consultation unanimously agreed with the Panel's provisional recommendation that P168 should be made.

Two respondents noted their view that publication of GC and DC values would result in an improved level of market transparency, and would therefore better facilitate effective competition (Applicable BSC Objective (c)).

6.2 Draft legal text

Those respondents who commented on the draft legal text for P168 unanimously agreed that the proposed text correctly addressed the issue identified in the Modification Proposal.

No respondents had any further comments on the proposed text.

6.3 Recommended Implementation Date

All respondents unanimously agreed with the provisional Implementation Date proposed by the Panel for P168.

No respondents had any further comments on the proposed date.

6.4 Further comments

One respondent stated their preference for the Alternative Modification P169, noting that this would remove the requirement for P168.

6.5 Comments and views of the Panel

The Panel noted the responses received to the P168 Report Phase consultation, and that these contained no new arguments.

7 SUMMARY OF TRANSMISSION COMPANY ANALYSIS

7.1 Analysis

A Transmission Company analysis and impact assessment was commissioned during the Assessment Procedure for P168, and is summarised below:

- The Transmission Company did not believe P168 to have any impact on its ability to discharge its responsibilities under the Transmission Licence, its systems or processes, or any Core Industry Document;
- The Transmission Company expressed its view that P168 would better facilitate Applicable BSC Objective (c), since it believed the Proposal to be consistent with general support across the industry for greater transparency in the electricity market;
- Following BETTA Go-Active, the Transmission Company confirmed that its analysis applied on a GB-wide basis.

For more information regarding the Transmission Company's response, please refer to the P168 Assessment Report in Annex 3.

7.2 Comments and views of the Panel

The Panel noted the analysis and views of the Transmission Company.

8 SUMMARY OF EXTERNAL ADVICE

None commissioned.

9 IMPLEMENTATION APPROACH

The Panel noted the relatively small costs associated with amending the Code and BSCCo's reporting practice in order to publish GC and DC values on the BSC Website, and agreed the desirability of GC and DC values being reinstated on the website as soon as possible.

The Panel therefore agreed with the recommendation of the P168 MG that the Code Implementation Date for P168 should be 10 Working Days after an Authority decision, with the publication of GC and DC values to take effect from this date.⁴

The Panel noted that P168 would also result in a minor impact on the Reporting Catalogue, since this document mirrors the reporting requirements of Section V. The Panel agreed that the changes to the Reporting Catalogue should be implemented at a later opportune stage as part of a scheduled release in order to minimise the cost of these changes. The Panel noted the view of the P168 MG that no risk would result from delaying the Reporting Catalogue changes since the obligations of Section V would take precedence in the event of any perceived inconsistency between the Code and this Code Subsidiary Document.

The Panel considered the similarities between the estimated BSCCo implementation effort for P168 and for the Proposed Modification P169. The Panel noted BSCCo's advice that combining the implementation of P168 and the Proposed Modification P169 would incur only the P168 costs, due to the similarities in the solutions (and since the Proposed Modification P169 is estimated to require less effort than P168).

The Panel also expressed its preference for the Alternative Modification P169, and noted that if this was implemented P168 would no longer be required.

The Panel therefore considered that it would be desirable for the Authority to make its decisions regarding P168 and P169 simultaneously, since the proposed Implementation Dates for P169 Proposed and Alternative Modifications are also 10 Working Days following an Authority decision.

10 DOCUMENT CONTROL

10.1 Authorities

Version	Date	Author	Reviewer	Change Reference
0.1	21/10/04	Kathryn Coffin	BSC Parties/other interested parties	For consultation
0.2	01/11/04	Kathryn Coffin	Sarah Parsons	For technical review
0.3	02/11/04	Kathryn Coffin	Change Delivery	For quality review
0.4	04/11/04	Change Delivery	BSC Panel	For Panel review & approval
1.0	15/11/04	BSC Panel		For Authority decision

⁴ As the 'Registered BMU' spreadsheet is published every Monday using the previous Friday's data, the first publication of GC and DC values on the BSC Website would therefore occur on the first Monday following the Code Implementation Date for P168.

10.2 References

Ref	Document	Owner	Issue date	Version
1	Initial Written Assessment for Modification Proposal P168 'Publication of BMU GC and DC values on ELEXON website' ELEXON - Modification Proposal 168	BSCCo	06/08/04	1.0
2	England & Wales Assessment Consultation for Modification Proposal P168 'Publication of BMU GC and DC values on ELEXON website' ELEXON - Modification Proposal 168	BSCCo	20/08/04	1.0
3	GB Assessment Consultation for Modification Proposal P168 'Publication of BMU GC and DC values on ELEXON website' ELEXON - Modification Proposal 168	BSCCo	08/09/04	2.0
4	Draft Modification Report for Modification Proposal P168 'Publication of BMU GC and DC values on ELEXON website' ELEXON - Modification Proposal 168	BSCCo	04/11/04	0.4
5	Modification Report for Modification Proposal P169 'Publication of BMU names on ELEXON website' ELEXON - Modification Proposal 169	BSCCo	15/11/04	1.0

ANNEX 1 LEGAL TEXT

Legal text for P168 is included as Annex 1A, and is attached as a separate document.

ANNEX 2 MODIFICATION GROUP DETAILS

Member	Organisation	16/08/04	01/09/04 ☒	22/09/04
Roger Salomone	ELEXON (Chairman)	✓	✓	✓
Kathryn Coffin	ELEXON (Lead Analyst)	✓	✓	✓
Melanie Henry	ELEXON (Lawyer)	✓	✓	✓
Colin Prestwich	SmartestEnergy (Proposer's Representative)		✓	
Robert Owens	SmartestEnergy (Proposer's Alternate)	✓	✓	
Man Kwong Liu	SAIC		✓	✓
Carl Wilkes	Npower	✓		✓
Neil Smith	E.ON UK	✓	✓	✓
Mark Manley	Centrica	✓		✓
Andrew Colley	SSE		✓	
Helen Bray	EDF		✓	

Attendee	Organisation	16/08/04	01/09/04 ☒	22/09/04
Steve Mackay	Ofgem	✓		✓
David Edward	Ofgem		✓	
Phil Hewitt	EnAppSys	✓		

For details of the P168 MG's Terms of Reference for the Assessment Procedure, please refer to the P168 Assessment Report in Annex 3.

ANNEX 3 ASSESSMENT REPORT

The P168 Assessment Report is included as Annex 3A, and is attached as a separate document.

ANNEX 4 REPORT PHASE CONSULTATION RESPONSES

Copies of the responses received to the consultation regarding the P168 draft Modification Report are included as Annex 4A, and are attached as a separate document.

For copies of the responses received to the P168 Assessment Consultation, please refer to Annex 3B.

ANNEX 5 CLARIFICATION OF COSTS

There are several different types of costs relating to the implementation of Modification Proposals. ELEXON implements the majority of Approved Modifications under its CVA or SVA Release Programmes. These Programmes incur a base overhead which is broadly stable whatever the content of the release. On top of this, each Approved Modification incurs an incremental implementation cost. The table of estimated costs in Section 2 of this report has three columns:

- **Stand Alone Cost** – the cost of delivering the Modification as a stand-alone project outside of a CVA or SVA Release, or the cost of a CVA or SVA Release with no other changes included in the release scope. This is the estimated maximum cost that could be attributed to the Modification's implementation.
- **Incremental Cost** - the cost of adding the Modification to the scope of an existing release. This cost would also represent the potential saving if the Modification was to be removed from the scope of a release before development had started.
- **Tolerance** – the predicted limits of how certain the cost estimates are. The tolerance will be dependent on the complexity and certainty of the solution, and the time allowed for the provision of an impact assessment by the Service Provider(s).

The cost breakdowns are shown below:

PROGRESSING MODIFICATION PROPOSAL	
Meeting Cost	This is the cost associated with holding Modification Group meetings, and is based on an estimate of the travel expenses claimed by Modification Group members.
Legal/expert Cost	This is the cost associated with obtaining external expert advice, usually legal advice.
Impact Assessment Cost	Service Provider Impact Assessments are covered by a pre-determined monthly contractual charge. Therefore the cost included in this report is an estimate based on the level of impact assessment that the Modification is expected to require and may not reflect the actual cost attributed to the Modification, which will be based on a percentage of the contractual impact assessment costs for each month that it is assessed.
ELEXON Resource	This is the ELEXON Resource requirement to progress the Modification Proposal through the Modification Procedures. This is estimated using a standard formula based on the length of the Modification Procedures.

SERVICE PROVIDER ⁵ COSTS	
Change Specific Cost	Cost of the Service Provider(s) Systems development and other activities relating specifically to the Modification Proposal.

⁵ A Service Provider can be a BSC Agent or a non-BSC Agent, which provides a service or software as part of the BSC and BSC Agent Systems. The Service Provider cost will be the sum of the costs for all Service Providers who are impacted by the release.

Release Cost	Fixed cost associated with the development of the Service Provider(s) Systems as part of a release. This cost encompasses all the activities that would be undertaken regardless of the number or complexity of changes in the scope of a release. These activities include Project Management, the production of testing and deployment specifications and reports and various other standard release activities.
Incremental Release Cost	Additional costs on top of base Release Costs for delivering the specific Modification. For instance, the production of a Test Strategy and Test Report requires a certain amount of effort regardless of the number of changes to be tested, but the addition of a specific Modification may increase the scope of the Test Strategy and Test Report and hence incur additional costs.

IMPLEMENTATION COSTS	
External Audit	Allowance for the cost of external audit of the delivery of the release. For CVA BSC Systems Releases this is typically estimated as 10% of the total Service Provider Costs, with a tolerance of +/- 20%. At present the SVA Programme does not use an external auditor, so there is no External Audit cost associated with an SVA BSC Systems Release.
Design Clarifications	Allowance to cover the potential cost of making any amendments to the proposed solution to clarify any ambiguities identified during implementation. This is typically estimated as 5% of the total Service Provider Costs, with a tolerance of +/- 100%.
Additional Resource Costs	<p>Any short-term resource requirements in addition to the ELEXON resource available. For CVA BSC Systems Releases, this is typically only necessary if the proposed solution for a Modification would require more extensive testing than normal, procurements or 'in-house' development.</p> <p>For SVA BSC Systems Releases, this will include the management and operation of the Acceptance Testing and the associated testing environment.</p> <p>This cost relates solely to the short-term employment of contract staff to assist in the implementation of the release.</p>
Additional Testing and Audit Support Costs	Allowance for external assistance from the Service Provider(s) with testing, test environment and audit activities. Includes such activities as the creation of test environments and the operation of the Participant Test Service (PTS). For CVA BSC Systems Releases, this is typically estimated as £40k per release with a tolerance of +/-25%. For SVA BSC Systems Releases this is estimated on a Modification Proposal basis.

TOTAL DEMAND LED IMPLEMENTATION COSTS

This is calculated as the sum of the total Service Provider(s) Cost and the total Implementation Cost. The tolerance associated with the Total Demand Led Implementation Cost is calculated as the weighted average of the individual Service Provider(s) Costs and Implementation Costs tolerances. This tolerance will be rounded to the nearest 5%.

ELEXON IMPLEMENTATION RESOURCE COSTS

Cost quoted in man days multiplied by project average daily rate, which represents the resources utilised by ELEXON in supporting the implementation of the release. This cost is typically funded from the "ELEXON Operational" budget using existing staff, but there may be instances where the total resources required to deliver a release exceeds the level of available ELEXON resources, in which case additional Demand Led Resources will be required.

The ELEXON Implementation Resource Cost will typically have a tolerance of +/- 5% associated with it.

ONGOING SUPPORT AND MAINTENANCE COSTS

ELEXON Operational Cost	Cost, in man days per annum multiplied by project average daily rate, of operating the revised systems and processes post implementation.
Service Provider Operation Cost	Cost in £ per annum payable to the Service Provider(s) to cover staffing requirements, software or hardware licensing fees, communications charges or any hardware storage fees associated with the ongoing operation of the revised systems and processes.
Service Provider Maintenance Cost	Cost quoted in £ per annum payable to the Service Provider(s) to cover the maintenance of the amended BSC Systems.