

# Draft MODIFICATION REPORT for Modification Proposal P134 The Halting of Unnecessary and Inefficient Work and Expenditure Associated with Approved BSC

Prepared by: ELEXON on behalf of the Balancing and Settlement Code Panel

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**Consultation**

This document has been distributed in accordance with Section F2.1.10<sup>1</sup> of the Balancing and Settlement Code.

## RECOMMENDATIONS

The Balancing and Settlement Code Panel recommends that:

- **Modification Proposal P134 should be made; and**
- **AGREE the P134 Implementation Date of 2 Working Days after the Authority decision.**

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<sup>1</sup> The current version of the Balancing and Settlement Code (the 'Code') can be found at [www.elexon.co.uk/ta/bsc/el\\_docs/bsc\\_code.html](http://www.elexon.co.uk/ta/bsc/el_docs/bsc_code.html)

## CONTENTS TABLE

<b>Summary of impacted parties and documents .....</b>	<b>3</b>
<b>1 Description of (and issues raised by) Proposed Modification.....</b>	<b>4</b>
1.1 Modification Proposal .....	4
1.2 Proposed Modification .....	5
1.3 Issues raised by the Proposed Modification .....	5
1.4 Assessment of how the Proposed Modification will better facilitate the Applicable BSC Objectives 6	
1.5 Modification Group’s cost benefit analysis of Proposed Modification .....	6
1.6 Governance and regulatory framework assessment .....	6
<b>2 Rationale for Panel’s recommendations .....</b>	<b>7</b>
<b>3 Impact on BSC Systems and Parties .....</b>	<b>8</b>
3.1 BSCCo .....	8
3.2 BSC Systems.....	9
3.3 Parties and Party Agents .....	9
<b>4 Impact on Code and documentation.....</b>	<b>10</b>
4.1 Balancing and Settlement Code .....	10
4.2 Code Subsidiary Documents .....	10
4.3 Impact on Core Industry Documents and supporting arrangements .....	11
4.4 Impact on other configurable items.....	11
<b>5 Summary of consultations .....</b>	<b>11</b>
5.1 Summary of the consultation responses .....	12
<b>6 Summary of Transmission Company analysis.....</b>	<b>12</b>
<b>7 Summary of external advice .....</b>	<b>12</b>
<b>8 Implementation approach .....</b>	<b>12</b>
<b>9 Document control .....</b>	<b>12</b>
9.1 Authorities .....	12
<b>Annex 1 Draft legal text.....</b>	<b>13</b>
<b>Annex 2 Modification Group details.....</b>	<b>13</b>
<b>Annex 3 Consultation responses.....</b>	<b>13</b>
<b>Annex 4 Transmission Company analysis .....</b>	<b>13</b>
<b>Annex 5 BSC Agent impact assessments .....</b>	<b>13</b>
<b>Annex 6 Party impact assessments .....</b>	<b>13</b>
<b>Annex 7 Cost benefit analysis .....</b>	<b>13</b>
<b>Annex 8 Core Industry Document Owner impact assessments.....</b>	<b>13</b>
<b>Annex 9 Proposed text to modify BSCCo Memorandum and Articles of Association .....</b>	<b>13</b>
<b>Annex 10 Terms of reference and report/analysis of external consultants/advisors.....</b>	<b>13</b>

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### SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

The following parties/documents have been identified as being potentially impacted by Modification Proposal P134.

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

<b>Cost of implementing Proposed Modification:</b>	<b>See section 3.1</b>
<b>Total:</b>	

# 1 DESCRIPTION OF (AND ISSUES RAISED BY) PROPOSED MODIFICATION

## 1.1 Modification Proposal

Modification Proposal P134 'The Halting of Unnecessary and Inefficient Work and Expenditure Associated with Approved BSC Modification P82' (**P134**) was raised on 30 June 2003 by British Energy Power and Trading Limited.

P134 was raised following the statement by the Trade and Industry Secretary indicating that the government is not minded to introduce non-zero Transmission Loss Factors across Great Britain following the introduction of the British Electricity Trading and Transmission Arrangements (BETTA)<sup>2</sup>. It is understood from public statements made by the DTI/Ofgem that BETTA is expected to be implemented by April 2005. The Implementation Date for P82 is 1 April 2004.

P134, therefore seeks to modify the Balancing and Settlement Code ('the Code') to remove the changes that Approved Modification P82 ('Introduction of Zonal Transmission Losses on an Average Basis') introduced. P134 also seeks to ensure that BSCCo immediately discontinues work on the implementation of P82 which is scheduled for implementation on 1 April 2004.

The Code does recognise that transmission losses could be allocated on a locational basis, although the parameters to support this, the Transmission Loss Factors (TLFs), have been set to zero since Go-Live. P82 introduces the application of zonal differentiation of transmission losses on an average basis to generation and demand. Currently, and until the Implementation Date of P82, allocation is based on a fixed and uniform basis with a defined split between production and consumption.

Under P82, a new BSC Agent ('the Transmission Loss Factor Agent (TLFA)) is required to be appointed to calculate annual TLFs, on an ex-ante basis, using a methodology specified in the Code. In addition, TLFs would be 'scaled' by a factor of 0.5 such that only variable losses (i.e. those caused by heating) would be allocated on a zonal basis. The Authority in its decision letter stated that it was its opinion that P82 better facilitated the achievement of Applicable BSC Objectives (a), (b) and (c).

The P134 Proposer argued that the operation of P82 for a finite period of time, anticipated by them to be 12 months, will introduce costs which far outweigh any benefit of such limited operation and its removal through P134 would better facilitate the achievement of the Applicable BSC Objectives (b) and (d).

### Validity of the Modification Proposal

P134 is a valid Modification Proposal and was accepted as such by the Modification Secretary.

P134 satisfies the threshold tests of validity set out in F2.1.1 and F2.1.2 of the Code primarily because it identifies an issue in relation to the current legal version of the Code. The current version of the Code at any point in time is the Code as it is then published, plus all Approved Modifications.

### Urgent Modification Request

In submitting P134, the Proposer also requested that in order to avoid any unnecessary expenditure, P134 be treated as an Urgent Modification Proposal pursuant to Section F2.9 of the Code. BSCCo took into consideration the range of factors that had previously been used when evaluating whether a Modification Proposal should be recommended to have urgent status and agreed to recommend the urgent treatment of P134 to the Panel.

The procedures outlined within Section F2.9 of the Code have been followed and the Panel Chairman sought views on the urgent treatment of P134 from Panel members during a telephone conference on 30 June 2003. Of the Panel Members present during the telephone conference, all were supportive of the urgent treatment of this Modification Proposal. The Distribution System Operators' representative was also present and supportive of such treatment.

The urgent treatment of P134 was justified by the Panel on the basis that costs associated with the implementation of P82 are being incurred both centrally and by participants on an on-going basis. The Panel's view was that such expense may be unnecessary were P134 to be approved by the Authority

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<sup>2</sup> BETTA is scheduled for implementation on 1 April 2005

and it also recognised that BSCCo was in the process of finalising the terms of the TLFA contract, the signing of which would trigger release of funds to the TLFA.

### **Authority Decision on Urgent Modification Status**

On 01 July 2003, the Authority issued its decision letter, which stated that P134 should be subject to the normal Modification Procedures and should not be treated as urgent.

In making its decision, the Authority described some of the characteristics that it currently consider Modification Proposals should exhibit prior to being granted urgent status. These characteristics are:

- there is a very real likelihood of significant commercial impact upon NGC, industry parties, or customers if a Proposed Modification is not urgent;
- safety and security of the network is likely to be impacted if a Proposed Modification is not urgent; and
- the Proposal is linked to an imminent date related event.

Furthermore the decision letter stated that in addition - *"the Authority is of the opinion that the issuing of a 'minded to' statement by the Secretary of State regarding potential future GB wide trading arrangements should not affect its decisions regarding the processes concerning the modification of the England and Wales code. You will be aware that on the 17 January 2003 the Authority wrote to the Chairmen of all the code Panels and explained that until such time as the E (TT) Bill attained a significant step on the road to legal certainty, modifications to the England and Wales codes would continue to be processed and assessed on their appropriateness to England and Wales .... Until that time the prospective BETTA legislation should not influence the Authority's good regulatory practice which must be based on the current legislative and regulatory framework of the industry"*.

## **1.2 Proposed Modification**

The Proposed Modification is fully defined within the Modification Proposal and seeks to ensure that work currently underway implementing Modification Proposal P82 is halted and that the Code is modified to remove the changes that Approved Modification P82 ('Introduction of Zonal Transmission Losses on an Average Basis') introduced.

## **1.3 Issues raised by the Proposed Modification**

An initial written assessment (IWA) of Modification Proposal P134 was presented to the Panel at its meeting on 10 July 2003. The IWA identified the following potential areas of impact and issues which would need to be considered and addressed in processing the Modification Proposal.

- **The Authority has determined that P82 better facilitates the Applicable BSC Objectives.** P134 was raised to remove the effect of an Approved Modification, in this case P82. In making its determination with respect to P82, the Authority concluded that the achievement of the Applicable BSC Objectives would be better facilitated by P82's introduction. Additionally, in making its determination with respect to the urgency of P134, the Authority stated that prospective BETTA legislation should not influence the Authority's good regulatory practice which must be based upon the current legislative and the regulatory framework of the industry.

ELEXON noted in this regard that the DTI's view only has the status of a "minded to" decision and therefore, in ELEXON's opinion, has an inherent degree of uncertainty. It is clear that the BETTA proposed legalisation has government support, as is expressly stated by the Authority in its letter rejecting the application to treat P134 as an urgent modification. However, as the proposed legislation has not yet reached a significant step along the way to legal certainty, it therefore must also be regarded as having an inherent degree of uncertainty. Added to this,

the suggested BETTA implementation date of April 2005 in itself must also be regarded as, notwithstanding government support and firm intention, having an inherent degree of uncertainty.

Consideration of the above matters and of the Authority's letter to the Panel Chairman dated 17 January 2003 referred to above together with the Authorities letter to the Panel Chairman rejecting the application to treat P134 as urgent led ELEXON to conclude in the IWA that insufficient justification exists to support the view that the Applicable BSC Objectives would be better facilitated by the introduction of P134.

- **Interaction with Approved Modification P82 Development Plans.** It was noted that during the progression of P134, the work necessary to implement Approved Modification P82 would continue in order to meet its Implementation Date. This development work would include the signing of contracts with the new BSC Agent together with the contract for the model reviewer.
- **Interaction with Modification Proposal P125.** It was noted that should **P134** be approved, Modification Proposal P125 '*Apportionment of the Scottish Interconnector flows to the Northern and North Western GSP Groups for the purposes of calculating losses*' (P125) would not be necessary. This is because P125 sought to amend the treatment of zonally differentiated transmission losses across the Interconnector, in the context of the P82 arrangements. Were P125 to be approved prior to P134, the legal text for P134 may need to be amended to take into account the change to the baseline.

#### **1.4 Assessment of how the Proposed Modification will better facilitate the Applicable BSC Objectives**

At its meeting on 10 July 2003, the Panel agreed that P134 should be submitted directly to the Report Phase with a recommendation that the Proposed Modification should be made. This section of the report normally contains the Modification Group's view on how the Proposed Modification better facilitates the achievement of the Applicable BSC Objectives. As no Modification Group met to discuss P134 the rationale for why, in the Panel's opinion, P134 better facilitates the achievement of the Applicable BSC Objectives is contained within Section 2 of this Report.

#### **1.5 Modification Group's cost benefit analysis of Proposed Modification**

No Modification Group was appointed to assess P134 and as such no cost benefit has been undertaken.

#### **1.6 Governance and regulatory framework assessment**

It is the view of the Proposer of P134 that the "Government's 27th June 2003 statement gave the strongest possible signals in the absence of primary legislation of its intention not to include Average Zonal Transmission Losses in the design of the GB market."<sup>3</sup>

The Authority has stated its view however that the BETTA arrangements have not yet attained a sufficient degree of certainty to enable it to influence the progression of Modification Proposals through the Modification Procedures set out under the Code.

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<sup>3</sup> Source: Slides presented to the Panel meeting on 10 July 2003 by the Proposer of P134

## 2 RATIONALE FOR PANEL'S RECOMMENDATIONS

At its meeting on 10 July 2003, the Panel agreed that P134 should be submitted directly to the Report Phase with a recommendation that the Proposed Modification should be made. The rationale for why, in the Panel's opinion, P134 better facilitates the achievement of the Applicable BSC Objectives is set out below.

It was the Proposer's view that significant weighting should be given to the "minded to" statement by the Secretary of State and that as a result of this statement and the pending BETTA legislation, that introduction of P134, by preventing what it viewed as unnecessary costs, would better facilitate the achievement of Applicable BSC Objectives (b) "The efficient, economic and co-ordinated operation by the Transmission Company of the Transmission System" and Applicable BSC Objective (d) "Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.". It was the Proposer's opinion that these benefits would be seen provided that expenditure on the progression of P82 is halted quickly. It was also the Proposer's view that continuing with P82 will create uncertainty for suppliers and customers wishing to enter into contracts for supply in the forthcoming Autumn contract round. The Proposer also believed that P134 better facilitated the achievement of Applicable BSC Objective (e). *"without prejudice to the foregoing objectives and subject to paragraph 3A, the undertaking of work by BSCCo (as defined in the BSC) which is:*

- (i) *necessary for the timely and effective implementation of the proposed British Electricity Trading and Transmission Arrangements (BETTA); and*
- (ii) *relevant to the proposed GB wide balancing and settlement code;"*

In coming to the recommendation within the P134 IWA, BSCCo outlined that it did not believe it was a sufficiently competent body with respect to judging how much influence the following factors should have on the outcome of the decision by the Panel in respect of P134:

- the certainty or otherwise of the BETTA Legislation;
- the certainty or otherwise of the proposed implementation timetable of BETTA; and
- how much influence a "minded to" statement should have on the treatment of Modification Proposals under the Code.

As such BSCCo's recommendations therefore considered only those matters which it believed could legitimately be taken into account in considering any modification to the Code. This view was also supported by BSCCo's legal advisors before and at the Panel meeting.

In view of the above, the only recommendation open to BSCCo, in the absence of any formal change occurring, within the Balancing and Settlement Code legal framework, was to recommend that the Panel's recommendation should be that P134 should be submitted directly to the Report Phase with a recommendation that the Proposed Modification should not be made.

The Panel discussed to what extent a "minded to" statement by the Secretary of State in relation to whether non zero Transmission Losses would be introduced on a GB wide basis should influence their decision in respect of P134.

The Panel believed that there was a reasonable certainty that the existing Balancing and Settlement Code would evolve into the relevant Code to be applied on a GB-wide basis. In view of the 'minded to' statement from the Secretary of State, that non-zero TLFs would no longer be applied within the Code from that point, the Panel believed that the "minded to" statement should have a heavy bearing on its recommendation.

Consequently, the Panel believed that the costs (both to BSCCo and the industry) involved in implementing P82 were not justified, as the purported benefits of the transmission losses scheme would not be realised over the life of the scheme as the lifetime of the scheme would now be considerably shorter than that originally envisaged. (i.e. it was the Panel's opinion that non zero TLFs

would only exist between the P82 implementation date and the BETTA go live date). The Panel therefore believed that the benefits of P82 would be curtailed to the point of being nugatory, although the implementation costs remain. Hence implementing P134 would, in the Panel's opinion, prevent some unnecessary costs being incurred and would therefore better facilitate the achievement of Applicable BSC Objective (d).

The Panel also considered the position of participants who were attempting to agree contracts during Autumn 2003. If P134 were to be rejected, the Panel judged that participants would need to negotiate contracts which reflected the P82 arrangements for a short period of time and then not to, albeit with some degree of uncertainty, particularly on the actual timescale for the inclusion of the P82 treatment. If P134 were to be accepted, contracts could be negotiated without any account being taken of the P82 arrangements with an improved degree of certainty. The Panel concluded, therefore, that acceptance of P134 would result in enhanced efficiency for the industry, thus leading to better achievement of Applicable BSC Objective (c).

In view of the above considerations, the Panel agreed that its recommendation to the Authority was self evident and that P134 should be submitted to the Report Phase with a recommendation to approve the Proposed Modification P134. The Panel also recognised that going straight to report (having failed to gain urgency status) would mean that resolution of the issue would not be delayed any further. It believed that the benefits through the reduction of costs which P134 seeks to achieve would not be realised, as those costs would be incurred anyway if any other, more lengthy, procedure was followed.

In coming to this recommendation, the Panel recognised that in taking its decision on P82 the Authority would have taken into account its wider statutory responsibilities and objectives (in relation to consumers, the environment etc.) and that on these same grounds it was possible that the Authority might reach a different decision on P134 than that recommended by the Panel which was looking solely at what might be best within the confines of the Code.

### 3 IMPACT ON BSC SYSTEMS AND PARTIES

#### 3.1 BSCCo

The initial assessment undertaken in respect of P134 identified the following as potentially being impacted by the Modification Proposal.

Area of Business	Potential Impact of Proposed Modification
BSCCo Systems	Business Process Model <sup>4</sup> , BSC Website developed and the ELEXON NGC file converter would need to be amended to remove any changes introduced by P82.
BSCCo Contracts (Excluding BSC Agent Contracts)	The contract with the TLFA Modelling Reviewer will need to be terminated.
Other (e.g. costs, staffing, etc.)	The project to implement Modification Proposal P82 has an overall budget of approximately £670K including the costs of procuring a new BSC Agent. At the July Panel meeting, approximately £160K of this budget had been spent with the majority of the remaining budget to be spent by 1 December 2003. Were any decision in favour of P134 forthcoming before this date then, other than Project closedown

<sup>4</sup> Work on the Business Process Model and the BSC Website has not yet commenced.

	costs, there would be an amount of money as yet unspent on the P82 development, a proportion of which (i.e. that not already contractually committed) would not have to be spent.
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### 3.2 BSC Systems

An initial assessment has been undertaken in respect of all BSC Systems and processes and the following have been identified as potentially being impacted by the Modification Proposal

BSC System / Process	Potential Impact of Proposed Modification
Registration	Changes to the Central Registration Agent systems and processes have been commenced in order to implement P82. This work will need to be stopped. It should be noted however that the changes required for P82 have been developed in a modular manner and therefore can be removed from the relevant software release without the need for additional retesting.
Collection and Aggregation of Metered Data	The Central Data Collection Agent is developing some bespoke software in order to provide an extract of Metered Volumes for the sample Settlement Periods required by the TLFA and work undertaken on this would need to be halted
TLFA Service Development	Activities associated with the service development currently being undertaken by the TLFA would need to be halted.

### 3.3 Parties and Party Agents

During the progression of P82 Detailed Level Impact Assessments were requested to understand which Party systems would be impacted by the introduction of P82. It is logical to assume that systems impacted by the introduction of P82 may also be impacted by the approval of P134.

The following Party systems were identified as being potentially impacted by the introduction of P82 and hence could be impacted by the introduction of P134:

- Demand forecasting;
- Billing;
- Settlement;
- Risk Management;
- Power Pricing; and
- Trading

At the time of the P82 impact assessment, respondents indicated that a lead-time of between 3 and 12 months would be required to implement the necessary changes and two respondents cited costs for the additional developments required, one quoted a cost of £250,000 to £500,000 and the other a cost of £500,000 to £1,500,000. It is also assumed that a proportion of party implementation costs would be avoided if P134 was approved, although it is not possible to quantify this amount without further information from parties.

## 4 IMPACT ON CODE AND DOCUMENTATION

### 4.1 Balancing and Settlement Code

An initial assessment has been undertaken in respect of all Sections of the Code and the following Sections have been identified as potentially being impacted by the Modification Proposal.

Item	Potential Impact of Proposed Modification
Section E	The definition of the TLFA would need to be removed from the Code.
Section H	Reference to the Load Flow Model specification would need to be removed.
Section T	Additional annexes inserted during P82 that provided a high level description of the Transmission Factor Methodology and the Load Flow Model used to generate zonal TLFs would need to be removed.
Section V	The reporting requirements of the TLFA
Annex X1 and X2	The additional definitions added to Annex X1 and Annex X2 would need to be removed.

### 4.2 Code Subsidiary Documents

An initial assessment has been undertaken in respect of all Code Subsidiary Documents and the following documents have been identified as potentially being impacted by the Modification Proposal.

It should be noted that Code Subsidiary Documentation changes developed as part of the implementation of P82, have been developed in a standalone manner. The main impact will therefore be to ensure that any changes to Code Subsidiary Documents introduced as part of P82 are not incorporated into the final versions of any documents release as part of the Central Volume Allocation release programme.

Item	Potential Impact of Proposed Modification
BSCP01	BSCP01 – 'Overview of Trading Arrangement – Remove changes introduced by P82
BSCP15	BSCP15 - 'BM Unit Registration' - update required to remove obligation on the CRA to notify TLFA of registration of new BM Units and de-registration of existing BM Units – Remove changes introduced by P82
BSCP38	BSCP38 – Authorisations - – Remove changes introduced by P82
BSCP41	BSCP41 – Report Requests and Authorisation - – Remove changes introduced by P82.
TLFA Service Description	Work has completed on the TLFA Service Description was approved at the Panel meeting on 10 July 2003 will need to be deleted.
CRA Service Description	Remove changes introduced by P82 (draft)
CDCA Service Description	Remove changes introduced by P82 (draft)
SAA Service Description	Remove changes introduced by P82 (draft)

NETA Data File Catalogue	Remove changes introduced by P82 (draft)
Reporting Catalogue	Remove changes introduced by P82 (draft)
Communications Requirements Document	Remove changes introduced by P82 (draft)
Load Flow Model Specification	Remove changes introduced by P82 – Approved by Panel at June 2003 meeting.

### 4.3 Impact on Core Industry Documents and supporting arrangements

An initial assessment has been undertaken in respect of Core Industry Documents and no documents have been identified as potentially being impacted by the Modification Proposal.

An initial assessment has been undertaken in respect of other configurable items and the following have been identified as potentially being impacted by the Modification Proposal.

### 4.4 Impact on other configurable items

Item	Potential Impact of Proposed Modification
CDCA User Requirements Specification	Remove changes introduced by P82
CRA User Requirements Specification	Remove changes introduced by P82
TLFA Documentation	Remove changes introduced by P82
Interface Definition Document Part II	Remove changes introduced by P82

## 5 SUMMARY OF CONSULTATIONS

To be completed following the consultation on P134.

Consultation question	Respondent agrees	Respondent disagrees	Opinion unexpressed
Do you agree with the Panel's views on P134 and the provisional recommendation to the Authority contained in the draft Modification Report that P134 <b>should</b> be made?			
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?			

Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P134? Please give rationale.			
Do you believe that there are any impacts that have not been highlighted?			

### 5.1 Summary of the consultation responses

[To be completed following the consultation on P134.]

## 6 SUMMARY OF TRANSMISSION COMPANY ANALYSIS

No transmission Company Analysis has been commissioned. However at the July Panel meeting, the Transmission Company represented indicated the size of the budget within the Transmission Company to prepare for BETTA. The Transmission Company representative indicated that as the costs were significant they had placed a heavy reliance on BETTA being introduced.

## 7 SUMMARY OF EXTERNAL ADVICE

None commissioned.

## 8 IMPLEMENTATION APPROACH

On the advice of the BSCCo, the Panel recommends that P134 should be implemented two Working Days after an Authority decision in favour of P134. If a decision is made in favour of P134, BSCCo would seek to close down in an orderly manner any work underway on the development of P82.

## 9 DOCUMENT CONTROL

### 9.1 Authorities

Version	Date	Author	Reviewer	Change Reference
0.1	17/07/03	Richard Clarke	Change Delivery	For review
0.2	24/07/03	Richard Clarke	Change Delivery	Incorporating Review comments – Issued for consultation

**ANNEX 1 DRAFT LEGAL TEXT**

The legal text for the Proposed Modification is attached as a separate document.

**ANNEX 2 MODIFICATION GROUP DETAILS**

As this Modification Proposal was submitted directly to the Report Phase, no Modification Group was formed to undertake an assessment of whether or not the Proposed Modification better facilitates the Applicable BSC Objectives.

**ANNEX 3 CONSULTATION RESPONSES**

[To be completed following consultation]

**ANNEX 4 TRANSMISSION COMPANY ANALYSIS**

None commissioned.

**ANNEX 5 BSC AGENT IMPACT ASSESSMENTS**

None commissioned.

**ANNEX 6 PARTY IMPACT ASSESSMENTS**

None commissioned.

**ANNEX 7 COST BENEFIT ANALYSIS**

None commissioned.

**ANNEX 8 CORE INDUSTRY DOCUMENT OWNER IMPACT ASSESSMENTS**

None commissioned.

**ANNEX 9 PROPOSED TEXT TO MODIFY BSCCO MEMORANDUM AND ARTICLES OF ASSOCIATION**

No impact identified.

**ANNEX 10 TERMS OF REFERENCE AND REPORT/ANALYSIS OF EXTERNAL CONSULTANTS/ADVISORS**

No external consultations/advisors commissioned.