

<b>Change Proposal – F40/01</b>	<b>CP No:1170</b>  <b>Version No:</b> <b>5.0</b>
<b>Title</b> <i>(mandatory by originator)</i> Improving the BSC Change Process	
<b>Description of Problem/Issue</b> <i>(mandatory by originator)</i>  SVA Suppliers and their Agents have for some time been expressing concerns (at SVG, SAF and elsewhere) that the BSC Change Process does not adequately meet their needs with regards to the timely implementation of the changes to their systems and processes that are required in order to implement Agreed Changes to the BSC Baseline. Industry participants are particularly concerned that changes are not being adequately defined early enough in the change process, in particular that the red-lined version of industry documentation, such as BSCPs, that have been impacted by a Change Proposal (CP) are usually not produced and circulated to the industry until close to the Implementation Date of the CP. This late availability of core documents often necessitates market participants to commence with the development work (eg specification, development and testing) required to implement agreed changes on the basis of an individual company's interpretation of the solution as contained within the Change Proposal, rather than on the basis of a well-defined solution (as contained in the red-lined documentation that is received close to the implementation date). This situation often leads to differences of interpretation occurring between market participants, which in turn leads to the following issues: <ul style="list-style-type: none"> <li>• Interoperability issues</li> <li>• Inconsistencies in the industry (BSC) requirements</li> <li>• The creation of new issues within the market process(es) that have been impacted by the Change Proposal (sometimes the creation of more serious issues than those that the original CP was intended to resolve)</li> <li>• Increased Costs, especially if parties are required to amend their development plans close to implementation when further clarification becomes available or inconsistencies are resolved</li> <li>• Delays in implementation in order to resolve any differing interpretation issues etc that may come to light during the course of individual companies development work</li> </ul>	
<b>Proposed Solution(s)</b> <i>(mandatory by originator)</i>  In order to resolve the issues outlined above, it is proposed that the following changes should be made to the BSC Change Process: <p><b>Change Proposals (CPs)</b></p> CPs will become formal changes where the Originator has a clear understanding of the issue and its solution, and should be raised on Form BSCP40/02. CPs need to meet the following criteria (which are detailed in BSCP40 Appendix 4.4) before they can be accepted by ELEXON into the change process. The CP must: <ol style="list-style-type: none"> <li>1. Contain a single clearly defined solution and should, where applicable, be accompanied by supporting documentation (eg red-lined versions of any Category 1 Configurable items that the CP is proposing should be amended; formats of proposed new/amended reports etc).</li> </ol>	

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2. Contain a Requested Implementation Date.
3. Contain a List of Impacts on Configurable Items and Core Industry Documents (eg Other Category 2 Configurable Items, DTC, STC etc)
4. Contain a reference to any associated or interacting Changes (DTC or other ELEXON Changes)

All fields within Form BSCP40/02 are Mandatory. Upon receipt of a CP ELEXON will check that all fields have been correctly completed and that all the required information has been provided. ELEXON will liaise with the Originator of the CP where necessary.

Category 1 Configurable Items are as follows:

- Balancing and Settlement Code Procedures;
- Party Service Lines;
- Codes of Practice;
- Business Definition Documents (encompassing Data catalogues, the Reporting Catalogue and the Communications Requirements Document);
- Interface Design Documents; and
- Descriptions of physical interfaces in Settlement Software Documents.

Please note that due to the detailed design work necessary for the production of the IDD, only the BSC Agent will be responsible for the drafting of this Category 1 document. Work on this documentation will only commence once a Panel Committee has agreed that such work can be undertaken. Once the redline text for the IDD has been produced by the BSC Agent it will be submitted alongside the CP and will under go the same Change Management controls as any of the other Category 1 documents.

Category 2 Configurable Items are all other Configurable Items.

Estimated Central Costs shall be added to the CP by ELEXON prior to the CP being issued to the Industry for Impact Assessment

CPs will be issued to the Industry for Impact Assessment in accordance with an agreed timetable, which shall be published on the BSC Website. If a CP is not received in time for inclusion in the next timetabled batch, then it will be included in the following batch. Urgent CPs (as determined by SVG/ISG as applicable), may be circulated outside the agreed timetable. Once a CP has been issued to the Industry for Impact Assessment it shall be published on the BSC Website.

ELEXON shall collate all responses received to a CP Impact Assessment and shall circulate these to all BCAs and PACAs on the date published in the CP batching timetable.

All CP's should be considered by SVG/ISG (as applicable), who should be able to agree to minor amendments to a CP provided that these have been proposed within the Impact Assessment responses received and that they have no material impact upon the Solution. The decision to make such amendments to a CP must be unanimous.

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The SVG/ISG (as applicable) should unanimously agree or reject each CP, and the results of this should be communicated to all BCAs and PACAs within 5 Working Days of the SVG/ISG meeting. Similarly, where the SVG/ISG (as applicable) have approved amendments to a CP then the amended version of the CP that has been approved shall be circulated to all BCAs and PACAs within 5 Working Days of the SVG/ISG meeting. The ISG / SVG will also agree the Implementation Date for the CP. Should it be necessary to change the Implementation Date of a CP after this has been agreed by the ISG / SVG, a consultation would be issued and any new Implementation Date would have to be agreed by the ISG / SVG.

### **Draft Change Proposals (DCPs)**

CP1170 is proposing that a new optional stage of raising a Draft CP should be introduced into BSCP40. This new optional stage, which is similar in concept to the MRA “pre-assessment” (SPF) process, would provide the Industry with the opportunity to submit Draft Change Proposals (DCPs) to the Industry for consultation. DCPs should highlight an issue that is being experienced within the industry and should contain one or more proposed solutions. Indeed the purpose of raising a DCP could be that the Originator wishes to stimulate debate within the industry regarding potential solutions to the issue. The following process is being proposed for DCPs:

1. DCPs should be completed using Form BSCP40/01, which should be completed by the Originator in accordance with the Guidelines contained within BSCP40 Appendix 4.2
2. An Originator of a DCP can elect to either submit the DCP to the Industry for consultation (alongside CPs) in accordance with the agreed timetable published on the BSC Website, or to request that they be progressed through a Working Group (see below).
3. Where an Originator has elected to submit a DCP to the Industry for consultation in accordance with the agreed timetable, ELEXON shall collate all responses received to the DCP consultation and shall circulate these to the Originator of the DCP, all BCAs and all PACAs on the date published in the CP batching timetable.
4. DCPs will not be sent to the SVG/ISG for review and consideration, rather all responses received to a DCP will be forwarded to the Originator for their consideration. Having reviewed the responses received, the Originator of a DCP can pursue one of the following courses of action:
  - The Originator can submit the DCP (or the Issue outlined in the DCP) to a Working Group for discussion and progression.
  - The Originator can revise the DCP in light of responses received and submit this revised DCP for further consultation.
  - The Originator can submit a formal CP into the process.
  - The Originator can take no action.

Draft Change Proposals would be identified as DCP. DCPs would be numbered starting at number 001.

Where a party wishes to refer a DCP to a Working Group the Originating BCA should submit a paper to be included on the Agenda of the next SVG/ISG meeting (as applicable) requesting that

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the DCP is investigated by a Working Group. The SVG/ISG will either agree or disagree for the DCP to be discussed at a Working Group and set the timetable for reporting back to the SVG/ISG. If agreed, the Working Group will then discuss the DCP and will report on its progress to SVG/ISG as agreed. Once the Working Group has reached a decision as to the most effective way forward, the originator or their representative on the Working Group can then choose not to progress the issue further, raise another DCP in accordance with the DCP process outlined in BSCP40, or if appropriate raise a CP using the CP process outlined in BSCP40. The Originator would be able to raise a CP at any point in the process if they wished. If the SVG/ISG do not agree that the DCP merits discussion at a working Group, they will notify the Originator of the reason for this. A DCP can be raised where a Party needs assistance to produce the redline text required for a CP. Under these circumstances the CP will be discussed by the Working Group, however Working Group will consist of only ELEXON and the Originator. In this scenario no approval will be sought from the Panel Committees to commence discussions.

### **Issues**

Where a Party feels that they have an issue, but are unsure of how/if to progress the concern, they may present the issue to the Panel Committees in order to seek guidance. The Panel Committees would then advise on any possible solution to the concern and how best to resolve the problem, i.e. raise a Draft CP and progress the issue to a Working Group. Please note that this process of addressing issues is an optional approach and does not affect the Issues process as defined in Section F of the BSC. In no way does this optional process remove the right of any applicable Party from raising a Draft or Formal CP.

An 'Issue' form can be found in Section 4.11 of BSCP40 and once completed should be submitted to the relevant Panel Committee secretariat so that it may be added to the applicable Panel Committee agenda.

### **Implementation of CPs**

Once the redlined text for Category 1 Configurable Items in a CP has been approved by the SVG/ISG, ELEXON would update the appropriate documents and the baseline for future changes would include the agreed text. Once the Implementation cut of date for any particular release has passed, ELEXON will publish the redlined text for all approved CPs in the release. Shortly before the Implementation Date for the release ELEXON will publish the clean version of the Configurable Items in the release.

For Category 2 Configurable Items included in a release, ELEXON would develop the changes in the same way as changes are currently developed. ELEXON would consult the industry on these changes and request the SVG/ISG agree the changes. The final redlined documents would not be available until they had been approved by the SVG/ISG which may be as late as 1-2 months prior to the Implementation Date of the CP.

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Since the redlined changes to documents important to Parties and Party Agents would be available when the CP is approved, ELEXON would no longer produce a Business Requirements Solution (BRS) for Parties and Party Agents to detail the changes.

### **Implementation of Modifications**

It is important that the redlined changes to Category 1 Configurable Items that are impacted by the implementation of a Modification Proposal are available to Parties and Party Agents in enough time to develop the changes that they need to their systems. Therefore, when Modifications are issued for Party and Party Agent Impact Assessment, ELEXON should ask the industry how long is required to implement the changes from the receipt of the agreed redlined text. The proposed Implementation Date for Modifications should take into account the length of time required for ELEXON to develop the redlined changes to Category 1 Configurable Items and receive approval for these from SVG/ISG and the length of time that the industry needs to implement the changes. Where agreed by the Panel, ELEXON may begin the process of developing the redlined changes prior to the Authority agreeing a Modification to reduce the overall implementation timescales. Therefore the approved redlined changes for Category 1 Configurable Items that are impacted by a Modification would be available in the timescales required by Parties and Party Agents.

Changes to category 2 Configurable Items impacted by a Modification would be developed in the same way as changes to category 2 Configurable Items impacted by a CP.

As with the implementation of CPs, since the redlined text is being produced early on in the process, there will no longer be a requirement for ELEXON to produce a BRS and issue this to Parties and Party Agents.

### **Working Group Membership**

Where it is possible current working groups will be used to discuss issues. Where necessary working groups will be created by the ISG/SVG. Working Groups can include Parties, Party Agents, ELEXON, BSC Agents, MRASCo, Ofgem energywatch and other industry experts where appropriate. ELEXON would chair the meetings and provide secretariat support. It is envisaged that participants will be able to join a standing membership email distribution list. When an issue or DPC is raised for discussion at a Working Group, all members of the appropriate Working Group will be notified, and those members who feel that they are impacted or can provide information on the issue or DPC can choose to attend the meeting of the Working Group.

Terms of Reference for the Working Group would have to be developed and agreed by the SVG/ISG.

Where a Party needs assistance developing the redlined changes to support their CP, they could raise a DCP and a Working Group could be formed of ELEXON and the originator to work up the redlined changes.

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### **Correcting Identified Errors**

It is proposed that the three sections in BSCP40 that relate to correcting identified errors are removed as the appropriate way to correct an identified error is to raise a CP (or if appropriate a DCP).

### **Urgent CPs**

A process for progressing urgent change proposals should also be added. The SVG/ISG would have to agree if a CP should be progressed urgently. If this is agreed then participants would still be able to comment on the CP, and it would still have to be approved by the ISG / SVG, however the timescales for progression and implementation could be shortened.

### **Agreement of the CP Impact Assessment Timetable**

Minor changes should be made to this section to allow the timetable to be released in line with the Panel timetable. Any changes to the published timetable should be sent to BCAs / PACAs for their views and agreed by the SVG/ISG. It is also proposed that the CP Impact Assessment timetable will also include the dates when the responses will be published on the BSC Website.

### **Other changes to BSCP40**

The introduction and appendices to BSCP40 should be updated to reflect the changes detailed above. A new form for raising a DCP is required.

It is proposed to remove the Impact Assessment form, as different questions will need to be asked for CPs and DCPs. If a CP is issued for Impact Assessment, BSCP40 would specify the minimum questions relating to agreement of the CP, Implementation Date and the impacts of the CP. There would be no standard questions for the Impact Assessment of DCPs. These will be determined by ELEXON and the Originator.

Since the changes to BSCP40 are wholesale, it is also proposed to renumber the remaining BSCP interface and timetable sections.

### **CSD Review**

Two changes to the CP form are proposed to take into account the findings of the CSD review. Firstly, the justification for a CP should be related to the Applicable BSC Objectives and secondly, a new line should be added to the form so that the proposer can detail the section in the Code that the required change relates to.

CP1170 is not proposing any changes to the current process for housekeeping changes, raising of Modifications, changes to the market index definition statement or registration of BSC Party Change Administrators or Party Agent Change Administrators.

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<p>The attached document details the changes proposed to BSCP40. Redlined and clean versions of this document are included.</p>	
<p><b>Justification for Change</b> <i>(mandatory by originator)</i></p> <p>The fundamental objective of the Change Process is the timely, consistent and efficient implementation across the industry of improvements to the processes specified in the BSC Code Subsidiary Documents.</p> <p>The purpose of this change is to ensure that all formal changes raised into the process have a clear, fully defined single solution with supporting documentation available at the point of Impact Assessment. This will ensure that when undertaking an Impact Assessment all participants have a clear understanding of the solution, with no potential for individual interpretation, which shall ensure a consistent approach towards implementation of the CP is achieved across the industry.</p> <p>The purpose of including the ability to raise draft change proposals (DCPs) to a Working Group, is to allow parties to consult on issues where the solution is not fully defined and where wider discussion across the industry would be beneficial.</p> <p>The Changes outlined above will make the process for developing, raising and implementing changes more robust, transparent, and should remove the issues being experienced with the current change process that are outlined within this CP.</p>	
<p><b>Configurable Items Potentially Affected by Proposed Solution(s)</b> <i>(optional by Originator)</i></p> <p>BSCP40</p>	
<p><b>Impact on Core Industry Documents</b> <i>(optional by originator)</i></p> <p>N/A</p>	
<p><b>Related Changes and/or Projects</b> <i>(mandatory by BSSCo)</i></p>	

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<b>Requested Implementation Date (mandatory by originator)</b> February 2007  <b>Reason:</b> February 2007 is the next available release.	
<b>Agreed Release/Implementation Date (mandatory by BSCCo)</b>	
<b>Originator's Details:</b>  <i>BCA Name...Laura Doherty.....</i>  <i>Organisation.....npower.....</i>  <i>Email Address.....market.compliance@npower.com.....</i>  <i>Date.....1<sup>st</sup> August 2006.....</i>	
Attachments: Yes – Revised BSCP40 (Clean) (59 Pages) and Revised BSCP40 (Redlined) (66 Pages)	