

Stage 03: Assessment Procedure Consultation

P298 'Consequential amendments to the BSC Modification process following the implementation of Third package and other miscellaneous changes'

P298 seeks to align the BSC with the Transmission Licence to reflect that the Authority can raise, or direct National Grid (as the Transmission Company and Licensee) to raise, Modifications it considers necessary to comply with, or implement, European electricity regulations and legally binding decisions.

This Assessment Procedure Consultation for P298 closes:

5pm on Thursday 27 February 2014

The Workgroup may not be able to consider late responses.



The P298 Workgroup initially recommends **approval** of P298

Low Impact:



- The Authority
- Transmission Company
- BSCCo

What stage is this document in the process?

- 01 Initial Written Assessment
- 02 Definition Procedure
- 03 Assessment Procedure
- 04 Report Phase



Any questions?

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About This Document

The purpose of this P298 Assessment Procedure Consultation is to invite BSC Parties and other interested parties to provide their views on the merits of P298. The P298 Workgroup will then discuss the consultation responses, before making a recommendation to the BSC Panel at its meeting on 10 April 2014 on whether or not to approve P298.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits/drawbacks and proposed implementation approach. It also summarises the Workgroup's key views on the areas set by the Panel in its Terms of Reference, and contains details of the Workgroup's membership and full Terms of Reference.
- Attachment A contains the draft legal text changes to the BSC for P298.
- Attachment B contains the specific questions on which the Workgroup seeks your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish the Workgroup to consider.

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Why Change?

The BSC needs amending to align with the Electricity Transmission Licence Standard Conditions ('the Licence'), specifically Standard Licence Condition (SLC) C3, which covers the BSC. This is to reflect that the Authority can raise, or direct National Grid¹ to raise, Modification Proposals in order to ensure that the BSC complies with the Electricity Regulation and any relevant legally binding decisions of the European Commission (EC) and/or the Agency² ('European Required').

This Modification is being progressed in parallel with the [Connection and Use of System Code](#) (CUSC) Modification Proposal [CMP225](#)³, as CMP225 proposes to make equivalent changes to the CUSC.

Solution

P298 proposes to modify Section F 'Modification Procedures' of the Balancing and Settlement Code (BSC) to align it with the Licence to reflect that the Authority may either (i) raise, or (ii) direct National Grid to raise, a Modification under certain circumstances. It also proposed to modify Section X: Annex X-1 'General Glossary' of the BSC to define certain terms used in the modification of Section F.

The Workgroup have not proposed an Alternative solution.

Impacts & Costs

P298 impacts BSCCo, the Transmission Company and the Authority. The changes will align the BSC with changes that have been made to the Licence.

The central implementation cost of the proposed solution will be approximately £240, which equates to one man-days effort.

As part of this consultation the Workgroup wishes to clarify and confirm any industry costs and impacts.

Implementation

The P298 Workgroup have recommended an initial approach of implementation 10 Working Days following an Authority decision to approve as part of a standalone release.

Recommendation

The Workgroup initially unanimously believes that the P298 Proposed solution would better facilitate Applicable BSC Objectives (a), (d) and (e). Therefore, the P298 Workgroup initially recommends that P298 is approved.

What is the proposed solution?

The proposed solution seeks to modify Section F to align it with the Transmission Licence Standard Conditions (SLC C3).

¹ As the Transmission Company and holder of the Licence (the Licensee).

² This relates to any legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators (ACER).

³ 'Consequential changes following Implementation of the Third Package and other miscellaneous changes'.



Background

In November 2011, the Department for Energy & Climate Change (DECC) implemented changes to the Licence to reflect new European legislation known as the 'Third Package'. It also introduced consequential changes that enable the Authority to:

- Raise Modifications to the BSC to implement Electricity Regulation and any relevant binding decision of the European Commission and/or the Agency ('European Required Modification').
- Direct National Grid to raise such Modifications within the same parameters.

Similar to Significant Code Review (SCR) Modifications, it also introduced requirements that an Authority raised or directed Modification:

- must be accepted by the Panel into the Modifications process;
- must not be withdrawn without the prior consent of the Authority; and
- must proceed in accordance with the Authority's timetable, which it may amend as required.

Furthermore, it introduced requirements that National Grid, and where relevant the Panel, must ensure that such Modifications complete each relevant step of the Modifications process and are implemented.

The above provisions also cover such situations where National Grid raises a Modification without prior direction by the Authority, and which the Authority deems relates to Electricity Regulation and any legally binding decisions from Europe.

For the avoidance of doubt, P298 does not affect any Modification Proposal raised by a Party (other than National Grid), which contains an element of European Regulation. In that scenario the Modification raised by the Party other than National Grid would proceed in the normal way.

Further clarification to the Licence changes

The BSC wasn't amended to reflect the Licence changes at the time, as the wording introduced into the Licence in 2011 could have been interpreted that the Authority could raise any Modification and not just a European Required Modification.

The Authority has since clarified the Licence with changes that came into effect on the 17 December 2013.

What is the issue?

The BSC has no provisions for how the Authority can raise, or direct National Grid to raise, European Required Modification Proposals. Therefore, the BSC is not aligned with the Licence and needs to be amended to reflect the Licence. It also needs to address any areas where the Licence is silent on the raising and progression of such Modifications to ensure clarity and efficiency of process.

What is the 'Third Package'?

The 'Third Package' consists of four EC Regulations and two EC Directives, which came into force on 3 September 2009. The aim of these is to bring in a competitive and integrated energy market to allow consumers to choose between different Suppliers; and provide for all Suppliers to access the market in each EC member state. It also brought into existence the [Agency for Cooperation of Energy Regulators \(ACER\)](#).

The UK Parliament gave effect to this in Great Britain in November 2011 through the [Electricity and Gas \(Internal Markets\) Regulations 2011](#).

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Proposed solution

P298 proposes to modify BSC Section F 'Modification Procedures' to align it with the Licence requirements; and includes provisions where the Licence is silent. It also proposed to modify BSC Section X: Annex X-1 'General Glossary' to define certain terms introduced by the changes to Section F.

Alignment with the Licence

P298 aligns Section F with the Licence where necessary to reflect that:

- the Authority may raise, or direct National Grid to raise, European Required Modifications;
- National Grid and the BSC Panel must accept these into the Modifications processes and that these must be progressed in accordance with any timetable directed by the Authority; and
- National Grid, where the Authority directs it to raise such Modifications, may only withdraw or amend the Proposed Solution with the prior consent of the Authority.
- The above provisions also cover such situations where National Grid only raises a Modification without prior direction by the Authority, and which the Authority deems is a European Required Modification.

Addressing events where the Licence is silent

The Licence is silent on a number of events, which the Workgroup agreed the legal text should address.

Adoption of withdrawn Modifications by BSC Parties

The Licence is silent on the event that the Authority withdraws, or agrees for National Grid to withdraw, a European Required Modification, and subsequently a Party wishes to adopt it. P298 provides for the adoption of such Modifications.

Amalgamation with other Modifications

The Licence is silent on the event where it is proposed to amalgamate two or more Modifications. P298 provides for the amalgamation of these types of Modifications subject to Authority agreement.

Influence of Authority conclusions and directions on the Panel's or relevant Workgroup's views

The Licence is silent on whether the Panel or relevant Workgroup should be influenced by the Authority's conclusions or direction. P298 includes an allowance for Workgroups and the Panel not to be fettered by the Authority's views.

Application of existing provisions to P298

Whilst not included in the Licence, P298 makes provisions for the Panel's involvement, specifically allowing the Panel to agree and sets the terms of reference for any necessary Workgroup meetings; and decide on when the Modification is progressed to the next

phase of the Modification Process (e.g. from Assessment Procedure to Report Phase). This is consistent with the existing provisions under Section F, but subject to any timetable directed by the Authority.

Legal text

To deliver the P298 proposed solution the BSC will require the following amendments:

BSC Section F

- Amend paragraph 1.1.5 to add reference to new section 8, which covers European Required Modifications.
- Amend paragraph 2.1.1 to add that the Authority may raise a European Required Modification.
- Amend 2.1.3 to include an exemption for European Required Modifications from the provisions for the Modification Secretary to refuse to accept such Modifications into the process; and include a cross-reference to 8.2.
- Amend 2.1.4 to include an exemption for such Authority raised or directed Modifications from the provisions for the Panel to refuse to accept such Modifications into the process; and include a cross-reference to 8.5.
- Insert a new paragraph 2.1.10A to reflect that where National Grid does raise a European Required Modification without prior Authority direction, then such Modifications must:
 - be accepted into the process;
 - not withdrawn without prior consent from the Authority;
 - not amalgamated without the prior consent from the Authority; and
 - progressed in accordance with any timetable directed by the Authority, which may include the completion of each of the proposal steps; and/or implementation of such Modification.
- Amend 2.1.12 to include the additional subject to clauses of new paragraphs 2.1.10A and 8.3.
- Amend 2.1.12A to include the additional subject to clauses of new paragraphs 2.1.10A and 8.3.
- Insert a new section 8 'Authority Raised or Directed Modification', which is the main section dealing with European Required Modifications. This includes, as well as those already referenced above, the provision for the Authority to direct National Grid to raise such Modifications.
- Insert new paragraph 8.1 to add that the Authority may raise a European Required Modification.
- Insert a new paragraph 8.1.1 to reflect that such Modifications must be progressed in accordance with any timetable directed by the Authority, which may include the completion of each of the proposal steps; and/or implementation of such Modification.

- Insert new paragraph 8.2 to add that the Authority may direct National Grid to raise a European Required Modification.
- Insert a new paragraph 8.2.1 to reflect that such Modifications must be raised by National Grid and progressed in accordance with any timetable directed by the Authority, which may include the completion of each of the proposal steps; and/or implementation of such Modification.
- Insert new paragraph 8.3 to add that an Authority raised or directed European Required Modification may not be withdrawn without prior consent from the Authority.
- Insert new paragraph 8.4 to add that an Authority raised or directed European Required Modification may not be amalgamated without prior consent from the Authority.
- Insert new paragraph 8.5, to include an exemption for such Authority raised or directed European Required Modifications from the provisions for the Modification Secretary and Panel to refuse to accept such Modifications into the process.
- Insert new paragraph 8.6, to include cross reference to 2.1.12B for where the Authority does consent to the withdrawal of a European Required Modification, which it has raised or directed.
- Insert new paragraph 8.7, to include an avoidance of doubt clause that any Authority raised or directed European Required Modification shall not fetter the views of the Panel or the Workgroup.

BSC Section X: Annex X1

- Add a definition of the "Agency" by cross-referencing it with the EC Regulation that established it.
- Add a definition of the "Electricity Regulation" by cross-referencing it with the EC Regulation that defines it.
- Add a definition of the "European Commission" by cross-referencing it with the Treaty that established it.

The proposed legal text changes to the BSC to deliver the P298 Proposed solution can be found in Attachment A.

Assessment Consultation Question

Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of the P298 proposed solution in respects to allowing the Authority to raise, or direct National Grid to raise, Modifications that it considers necessary to comply with, or implement, European Electricity Regulation and legally binding decisions?

Please provide rationale.

The Workgroup invites you to give your views using the response form in Attachment B.

Assessment Consultation Question

Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of the P298 proposed solution in respects to acceptance of such Modifications into the process?

Please provide rationale.

The Workgroup invites you to give your views using the response form in Attachment B.

Assessment Consultation Question

Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of the P298 proposed solution in respects to the progression of such Modifications in accordance with the Authority's timetable?

Please provide rationale.

The Workgroup invites you to give your views using the response form in Attachment B.

Assessment Consultation Question

Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of the P298 proposed solution in respects to preventing the withdrawal of such Modifications without the prior consent of the Authority?

Please provide rationale.

The Workgroup invites you to give your views using the response form in Attachment B.

Assessment Consultation Question

Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of the P298 proposed solution in respects to reflecting that any Authority conclusion or direction may not fetter the views of the relevant Workgroup, the voting rights of the Panel or the recommendation of the Modification Report in respect of such Modification?

Please provide rationale.

The Workgroup invites you to give your views using the response form in Attachment B.

Assessment Consultation Question

Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of the P298 proposed solution in respects to preventing the amalgamations of such Modifications without the prior consent of the Authority?

Please provide rationale.

The Workgroup invites you to give your views using the response form in Attachment B.

Are there any (other) alternative solutions?

The P298 Workgroup have not identified an Alternative solution.

Assessment Consultation Question

Are there any Alternative Solutions that the P298 Workgroup should consider?

Please provide rationale

The Workgroup invites you to give your views using the response form in Attachment B

4 Impacts & Costs



Estimated central implementation costs of P298

As the P298 proposed solution only involve changes to the BSC the costs to implement P298 are limited to the effort to update the code as set out below.

ELEXON Cost		Total Cost
Man days	Cost	
1	£240	£240

P298 impacts

Impact on BSC Parties and Party Agents

No impact.

Impact on Transmission Company

Procedures for raising Authority directed Modifications and associated processes.

Impact on BSCCo

Processes for progressing Authority raised or directed Modifications.

Impact on BSC Systems and process.

No impact.

Impact on Code

Code Section	Potential Impact
Section F	Governance for when the Authority may raise or direct the Licensee to raise Modifications; the powers and responsibilities of the Panel with respect to these Modifications; and the associated processes
Section X: Annex X-1	Inclusion of three definitions.

Related Changes

This Modification is being progressed in parallel with the CUSC Modification Proposal CMP225, as CMP225 proposes to make equivalent changes to the CUSC.

Likely Impacts

This Modification will not impact BSC Parties or Party Agents.

It has a low impact on the Transmission Company as the Licensee and ELEXON as the BSCCo. These impacts relate to the raising and progression of Authority raised or directed Modifications.

Assessment Consultation Question

Please indicate the impacts of the Proposed Solution on your organisation, in particular any perceived lead times and costs.

Please provide details

The Workgroup invites you to give your views using the response form in Attachment B

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5 Implementation

Recommended Implementation Date

The Workgroup initially recommends an Implementation Date for P298 of 10 Working Days following an Authority decision. This is because P298 Proposed solution only involves changes to the BSC and should have minimal impact on the Authority and National Grid.

Assessment Consultation Question

Do you agree with the Workgroup's recommended Implementation approach?

Please provide your rationale

The Workgroup invites you to give your views using the response form in Attachment B

The following section provides details on the Workgroup discussions that led to the P298 solution.

Solution Requirements

The P298 Workgroup agreed with the high-level solution, which they agreed reflects that:

- the Authority may raise, or direct the Licensee to raise, European Required Modifications;
- the BSC Panel must accept these into the Modifications processes and that these must be progressed in accordance with any timetable directed by the Authority; and
- National Grid, where the Authority directs it to raise such Modifications, may only withdraw or amend the Proposed Solution with the prior consent of the Authority.

However, a Workgroup member considered how in practice it would work where the Authority has raised or directed the Licensee to raise a Modification and whether or not the Proposer attending the Workgroup meetings would need written consent to amend the solution. The Authority attendee noted that the Licence drafting was silent in this area and didn't see any need to change the current rules around Proposer Ownership specifically for these types of Modifications. Therefore, once raised the Proposer or Proposer's representative can amend the Proposed solution in line with the current provisions.

The Workgroup agreed with the approach of adopting the SCR Modifications legal text as appropriate with respects to areas of the Licence that are silent, namely:

- as per the usual Modification process, the involvement of the applicable Panel in such Modifications in agreeing and setting the Workgroup's terms of reference and its ability to decide when the Modification is progressed to the next phase;
- the adoption of withdrawn Modifications by Parties providing that the Authority has given permission for the withdrawal;
- the amalgamations of these Modifications subject to the prior consent of the Authority; and
- allowance for the Workgroup and the Panel not to be fettered by the Authority's views.

With respects to amalgamations and the Authority's conclusions and directions not fettering the views of the Panel and Workgroups, the Authority's representative noted that he understands why the Workgroup may want to include provisions in the legal text, but noted that the Licence is silent on these aspects. ELEXON and a Workgroup member both made the point that because the Licence is silent, should the question of amalgamation come up in the future then there would be nothing in the Licence or the applicable BSC that would prevent or limit an amalgamation of such a Modification. The member pointed out that this could also be the case with respects to any 'fettering'. As such, the Workgroup felt that it was necessary to add something in the BSC for the avoidance of doubt.

Legal Text

The Workgroup agreed to capture the provisions provided in the Licence and use the SCR legal text as a basis for drafting the legal text for P298 as this covers the aspects of:

- amalgamation of such Modifications;
- whether the Authority's conclusions and directions should fetter the BSC Panel's voting rights and its Modification Reports, or influence the relevant Workgroup's views, with respects to such Modifications; and
- the adoption of a Modification by BSC Parties.

A Workgroup member asked whether it would be better to separate F8.1 of the draft legal text into F8.1a and F8.1b, with F8.1a covering where the Authority raises such Modifications; and F8.1b for where it directs the Transmission Company to raise such Modifications. The Workgroup member believed that this would be clearer for industry and the Panel meetings as to who was raising the Modification. He suggested that when the Authority raise, or National Grid raise at the direction of the Authority, such Modifications, then ELEXON and National Grid reference to the relevant clause (F8.1a or F8.1b) in their notifications. The Workgroup and Proposer agreed to this suggestion that this is reflected in the draft legal text.

A Workgroup member also pointed out that the Licensee includes specific clauses for where the Licensee must raise a Modification if directed; and the applicable Panel must follow the Authority's directed timetable. The Workgroup member also noted that the Authority is able to set a timetable for such Modifications that the Licensee has raised. As such, the Workgroup agreed that the legal should reflect this.

The Workgroup considered that there was the potential for National Grid to raise Modifications that may later be determined to have a European Required Modification element to it, and which it has raised without the prior direction of the Authority. It agreed, therefore, that the legal text needs to deal with such situations, so that the same provisions for Authority directed Modifications apply, at the discretion of the Authority, to those Modifications raised by National Grid that may later be determined to have a European Required Modification element.

The Workgroup believed that the legal text needn't contain a 'short-hand' definition (such as "European Required Modifications") within BSC Section X – Annex X-1 and CUSC Section 11, but it would be appropriate for National Grid and ELEXON to adopt one for use in their Modification Reports. In addition, the Workgroup agreed that there should be definitions of the "Agency", the "Electricity Regulation" and the "European Commission" included.

The Workgroup agreed that no other changes were required to Configurable Items.

Implementation Approach

ELEXON and the Proposer recommended to the Workgroup that the Implementation Date for P298 should be 10 Working Days following the Authority's decision. A Workgroup member asked ELEXON how much each Modification would cost to implement. ELEXON advised the Workgroup that as this would only require document changes, this would take approximately one WD each, so the costs would be minimal. The Workgroup agreed with the proposed implementation approach, with one Workgroup member commenting that

10WDs allows for sufficient time for the industry to implement and accounts for situations where the recipient of the notice may be on leave.

Practical scenarios

A member believed that the Workgroup should consider the practicalities for when the Authority raises a Modification and attends a Workgroup as Proposer and observer. The member didn't think it needed consideration as part of the legal text but thought it would be useful to provide guidance for future Workgroups where this may become relevant. The member noted that there could be a legal challenge if the Authority expresses an opinion and it is not clear as to whether it is doing so as the Proposer or as an observer. The member suggested that the Authority might want to send two people, one as the Proposer and one as an observer. ELEXON suggested that it could add requirements into generic terms of reference. This could expand on the legal text and include an express requirement that where the Authority sends one person, the Authority's representative must state when it is making a statement as the Proposer or as an observer. The member agreed and suggested that the Final Modification Reports should also include specific reference to when the Authority has expressed a view as Proposer and as an observer. The Workgroup agreed with this approach.

The Workgroup also considered how in practice, the situation where National Grid raises a Modification without the prior direction of the Authority that is later identified as having a European Required Modification element to it, would be managed. ELEXON advised that if it identified the element when first raised, then under the Code Administrator Code of Practice (CACoP) 'critical friend' role, it would discuss this with National Grid as the Proposer, which could then amend the Proposal. The Workgroup agreed that if it was picked up later, such as during the Assessment Procedure, National Grid could amend their Proposal under the existing provisions of Proposer ownership to remove that element. Where the National Grid doesn't amend the Proposal, the Authority may then apply the provisions as if it directed the Modification; whereas, if National Grid removed any European Required Modification element, the Authority could then raise, or direct National Grid to raise, that element as a separate Modification Proposal.

Other considerations

A Workgroup member asked if the "Agency" has or will have the power to make any legally binding decisions. The Authority's representative and a Workgroup member agreed that it would, with the Workgroup member believing that the Authority would determine if any decision was legally binding prior to any Modification being raised or directed. The Authority's representative agreed with this view. The Workgroup concluded that if the Agency didn't have the power, then (i) the Licence or Act wouldn't have included it and (ii) the Authority would not be able to raise (or direct) a Modification as the ACER decision would not be legally binding.

7 Workgroup's Initial Conclusions



Recommendation

The P298 Workgroup initially recommends the approval of P298.

Workgroup's views against the Applicable BSC Objectives

The Workgroup unanimously agreed that the P298 Proposed solution would overall better facilitate the Applicable BSC Objectives compared with the existing baseline and should be approved.

The following table contains the Workgroup's initial views against each of the Applicable BSC Objectives for the Proposed solution:

Does P298 better facilitate the Applicable BSC Objectives?		
Obj	Proposer's Views	Other Workgroup Members' Views ⁴
(a)	<ul style="list-style-type: none">Yes (unanimous) – the proposed solution will ensure that the BSC correctly reflects the conditions under which the Authority can raise or direct the Licensee to raise Modifications relating to electricity regulation.	<ul style="list-style-type: none">None
(b)	<ul style="list-style-type: none">Neutral – No impact (unanimous)	<ul style="list-style-type: none">None
(c)	<ul style="list-style-type: none">Neutral – No impact (unanimous)	<ul style="list-style-type: none">None
(d)	<ul style="list-style-type: none">Yes (unanimous) - the proposed solution will ensure that the BSC accurately reflects the provisions set out in Licence covering the circumstances and processes to be followed in relation to Authority raised Modification Proposals. Therefore, it will ensure that such Modifications proposals are progressed efficiently and effectively.	<ul style="list-style-type: none">None
(e)	<ul style="list-style-type: none">Yes (unanimous) - the proposed solution will ensure that the BSC complies with changes resulting from the Electricity and Gas (Internal Markets) Regulations 2011 and enabling the BSC to be aligned with any future electricity regulation.	<ul style="list-style-type: none">None



What are the Applicable BSC Objectives?

(a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence

(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System

(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

(d) Promoting efficiency in the implementation of the balancing and settlement arrangements

(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]

Assessment Consultation Question

Do you agree with the Workgroup's initial unanimous view that P298 better facilitates the Applicable BSC Objectives than the current baseline and should be approved?

Please provide rationale.

The Workgroup invites you to give your views using the response form in Attachment B

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⁴ Shows the different views expressed by the other Workgroup members – not all members necessarily agree with all of these views.

Workgroup's Terms of Reference



Specific areas set by the BSC Panel in the P298 Terms of Reference	Section reference
Should P298 adopt the legal text for SCR Modifications, where applicable and relevant; and does not contravene the Licence? If not, what are the Workgroup's views on the legal text required?	3 and 6
How should the BSC define amalgamations of Modifications with respects to a Modification that implements Electricity Regulations and any legally binding decisions from Europe? (Consider scenarios where two or more of these types of Modifications could be amalgamated; and where one of these with one or more other Modifications).	3 and 6
How should the BSC define the Panel's voting rights and its Modification Reports, with respects to the Authority's direction on a Modification that implements Electricity Regulations and any legally binding decisions from Europe? (This includes the setting of the terms of reference and when to progress a Modification from one phase to another e.g. from Assessment Procedure to Report Phase).	3 and 6
How should the BSC define the influence of the Authority's conclusions and directions on the relevant Workgroup's views?	3 and 6
What provisions or restrictions, if any, should there be on the adoption of a Modification that implements Electricity Regulations and any legally binding decisions from Europe by BSC Parties?	3 and 6
What other areas of the Transmission Licence are silent and need to be considered for inclusion in the BSC?	6
What changes are needed to BSC documents, systems and processes to support P298 and what are the related costs and lead times? (Section X: Annex X-1, BSCP40)	6
Standard Areas of Consideration: <ul style="list-style-type: none"> Are there any Alternative Modifications? Does P298 better facilitate the Applicable BSC Objectives than the current baseline? 	3, 6 and 7

P298 Progression timetable

P298 Assessment Timetable	
Event	Date
Panel submits P298 to Assessment Procedure	12 Dec 13
Workgroup Meeting 1	6 Jan 14
Workgroup Meeting 2	20 Jan 14
Assessment Procedure Consultation	6 – 27 Feb 14
Workgroup Meeting 3	W/B 3 Mar 14

P298 Assessment Timetable	
Event	Date
Panel considers Workgroup's Assessment Report	10 Apr 14
Report Phase Consultation	11 Apr – 9 May 14
Present Draft Modification Report to Panel	12 Jun 14
Issue Final Modification Report to Authority	13 Jun 14

Workgroup membership and attendance

P298 Workgroup Attendance			
Name	Organisation	6-Jan-14	20-Jan-14
David Barber	ELEXON (<i>Chair</i>)	✓	
Simon Fox	ELEXON (<i>Lead Analyst</i>)	✓	
Emma Radley	National Grid (<i>Proposer</i>)		
Esther Sutton	E.ON UK	✓	
James Anderson	ScottishPower Energy Management	✓	
Garth Graham	SSE	✓	
Phil Russell	Redholm Informatics	✗	
Lisa Waters	Waters Wye Associates	✗	✗
Attendees			
Tina Wirth	ELEXON (Lead Lawyer)	✓	
Andrew Poppleton	National Grid	✗	
Stacey McLanaghan	National Grid	✓	✗
Abid Sheikh	Ofgem		