



Stage 04: Fast Track Self-Governance Modification Report

P301 'Replacement of National Consumer Council by Citizens Advice and Citizens Advice Scotland'

P301 will make minor amendments to the BSC to reflect that the National Consumer Council has been abolished and its responsibilities have been transferred to Citizens Advice and Citizens Advice Scotland.

The Fast Track Self-Governance objection deadline for P301 is:

5pm on Monday 2 June 2014



The BSC Panel **Approved** P301

This Modification impacts:

- BSC Panel
- Citizens Advice and Citizens Advice Scotland
- ELEXON

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

▶ 04 Report Phase

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Fast Track Self-Governance Modification Report

9 May 2014

Version 1.0

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About This Document

This is the P301 Fast Track Self-Governance Modification Report, which ELEXON has submitted to the Authority, the Transmission Company and all BSC Parties.

P301 is a Fast Track Self-Governance Modification, so it does not go to the Authority for decision. The Panel has approved P301 for implementation 1 Working Day following the end of the Fast Track Self-Governance objection window.

In accordance with BSC Section F7.3, Parties have until 2 June 2014 to object to the Panel's decision stating why they do not believe P301 meets the Fast-Track Self-Governance criteria.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits/drawbacks and implementation approach. It also summarises the Panel's key views on the Modification.
- Attachment A contains the approved redlined changes to the BSC for P301.
- Attachment B contains the approved redlined changes to BSCP40 for P301.



Any questions?

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Why Change?

Following the abolishment of the National Consumer Council (NCC) on 1 April 2014, the Transmission Licence has been amended to reflect this and that the functions of the NCC have been transferred to Citizens Advice and Citizens Advice Scotland

Solution

P301 amends the BSC to reflect the changes to the Transmission Licence by removing instances of NCC and replacing them with Citizens Advice and Citizens Advice Scotland. In addition to this, the structure of certain BSC sections have been amended to make them easier to read.

Impacts & Costs

P301 impacts the BSC and BSC Procedure (BSCP)40 'Change Management'.

The changes will have minimal impacts on the BSC Panel, Citizens Advice, Citizens Advice Scotland and ELEXON.

Implementation

P301 will be implemented **1 Working Day** (WD) following the end of the Fast Track Self-Governance objection window, if no objections are submitted.

Panel's Decision

The Panel unanimously agreed that P301 should be progressed as a Fast Track Self-Governance Modification Proposal.

The Panel unanimously **approved** P301.

2 Why Change?

Background

On 1 April 2014 the NCC was abolished and its functions were transferred to Citizens Advice (the National Association of Citizens Advice Bureaux) and Citizens Advice Scotland (the Scottish Association of Citizens Advice Bureaux).

On 24 February 2014, the Authority issued a notice advising of its decision to modify all [Standard Licence conditions](#), including the [Transmission Licence](#), to reflect the abolition of the NCC.

The changes to the Transmission Licence took effect on 22 April 2014, 56 days after the Authority's notice. This Modification has been raised to reflect these licence changes within the BSC.

What is the issue?

The BSC requires amendment to align it with the Transmission Licence by replacing instances of NCC with Citizens Advice and Citizens Advice Scotland.

Proposed solution

The BSC will be amended to reflect that the functions of the abolished NCC have been transferred to Citizens Advice and Citizens Advice Scotland.

The specific BSC sections that will be amended are set out below:

BSC Section B 'The Panel'

- Sections B1.1.2(c), B2.3 and B2.3.1 covering the composition of the Panel and the appointment of Panel Members by Citizens Advice and Citizens Advice Scotland.

Clarity will be added to Section B2.3.1 to make it clear that the two consumer Panel Member seats will remain unchanged. Two members from Citizens Advice or Citizens Advice Scotland can be appointed with the two bodies determining how these seats are filled.

For the avoidance of doubt there will continue to be only up to two consumer Panel Member seats.

BSC Section F 'Modification Procedures'

- Sections F2.1.1(b) and F2.1.10(a) covering who can raise Modification Proposals and who will receive Modification documents.

BSC Section X Annex X-1 'General Glossary'

- Delete definition of 'National Consumer Council'.
- Add new definition for 'Citizens Advice'.
- Add new definition for 'Citizens Advice Scotland'.

BSC Section Z 'Performance Assurance'

- Section Z2.1.2(e) covering who can attend the Performance Assurance Board (PAB) meetings. Additional minor changes will be made to restructure Section Z2.1.2(e) to make it easier to follow.

Other Code Subsidiary Document changes

Minor changes are also needed to BSCP40 to replace instances of NCC with Citizens Advice and Citizens Advice Scotland.

Legal text and Code Subsidiary Document changes

The BSC legal text changes can be found in Attachment A and the changes to BSCP40 can be found in Attachment B.

Justification against the Applicable BSC Objectives

By making these amendments it will ensure that the Code is aligned with the provisions in the Transmission Licence and provides clarity over which bodies can sit on the Panel and also raise Modification Proposals.

With this in mind the Proposer believes that this Modification Proposal will better facilitate:

- Applicable BSC Objective (a) as the proposed changes will mean that the BSC is consistent with Standard Licence Condition (SLC) C3 of the Transmission Licence; and
- Applicable BSC Objective (d) by ensuring that the BSC provisions reflect the Transmission Licence conditions by removing any discrepancy between the two.



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]

4 Impacts & Costs

Estimated central implementation costs of P301

The estimated ELEXON effort to implement P301 equates to £240 (or one man day). The ELEXON effort required is to update the relevant documents impacted by P301.

Impacts

Impact on BSC Parties and Party Agents

No impact

Impact on Transmission Company

No impact

Impact on Code

Code Section	Impact
Section B	Replace instances of NCC with Citizens Advice and Citizens Advice Scotland
Section F	Replace instances of NCC with Citizens Advice and Citizens Advice Scotland
Section X Annex X-1	Remove the definition of NCC Add the definitions of Citizens Advice and Citizens Advice Scotland
Section Z	Replace instances of NCC with Citizens Advice and Citizens Advice Scotland

Impact on Code Subsidiary Documents

CSD	Impact
BSCP40	Replace instances of NCC with Citizens Advice and Citizens Advice Scotland

Implementation approach

The Panel agreed that P301 should be implemented **1 Working Day (WD)** after the Fast Track Self-Governance objection window closes, if no objections are raised.

When would P301 be implemented having been progressed as a Fast Track Self-Governance Modification?

Following the Panel's unanimous agreement to progress P301 as a Fast Track Self Governance Modification and that it should be approved, the Panel's decision along with this Fast Track Self-Governance Modification report was published within 1 WD and issued to the Authority, Transmission Company and each Party in accordance with BSC Section F7.2.2.

The 15 WD objection window will commence from this notification. If no objections are raised, P301 would then be implemented **1 WD** following the end of the objection window on **3 June 2014**.



Panel's consideration of the Modification Proposal

Consideration of the Fast Track Self-Governance Criteria

The Panel **unanimously** agreed that P301 should progress as a Fast Track Self-Governance Modification as the changes:

- satisfies the Self-Governance Criteria, as the changes have no material impact on consumers, competition, the Transmission System and/or BSC Governance as the changes are minor, correct inconsistencies between the BSC and the Transmission Licence and makes sections easier to read; and
- falls within Section F2.1.1(d)(iv) (in that the changes will rectify manifest errors to correct minor inconsistencies, including updating names and typographical errors (i.e. 'housekeeping changes')) as P301 will be updating names (by replacing NCC with Citizens Advice and Citizens Advice Scotland) in the BSC to align with the Transmission Licence.

Applicable BSC Objectives

The Panel **unanimously** agreed that P301 better facilitates Applicable BSC Objectives (a) and (d) for the same reasons identified by the Proposer set out in Section 3..

Panel's final view on the Modification

The Panel **unanimously approved** P301 for implementation 1 WD after the Fast Track Self Governance objection window closes.

Decision

The BSC Panel has approved P301 as a Fast Track Self-Governance Modification



Fast Track Self-Governance Criteria

Is a Modification which;
(i) if implemented would satisfy the Self-Governance Criteria;

(ii) falls within the scope of Section F2.1.1(d)(iv) (without limiting the right of any person specified in paragraph 2.1.1 to propose a Fast Track Self-Governance Modification Proposal) and which is required to correct an error in the Code or as a result of a factual change, including but not limited to:

(a) updating names or addresses listed in the Code;

(b) correcting minor typographical errors;

(c) correcting formatting and consistency errors, such as paragraph numbering; or

(d) updating out of date references to other documents or paragraphs;

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The BSC Panel:

- agreed that P301 meets the Fast Track Self-Governance Criteria;
- approved P301;
- approved an Implementation Date for P301 of **1 WD** following the end of the Fast Track Self Governance objection window, if no objections are raised; and
- approved the BSC legal text and redlined BSCP40 changes for P301.

Self-Governance Criteria

(a) it is unlikely to have a material effect on:

(i) existing or future consumers;

(ii) competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution, or supply of electricity;

(iii) the operation of the national electricity transmission system;

(iv) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and

(v) the BSC's governance procedures or modification procedures; and

(b) it is unlikely to discriminate between different classes of BSC parties.

Appendix 1: Glossary & References

Glossary of defined terms

Acronyms and other defined terms used in this document are listed in the table below.

Glossary of Defined Terms	
Acronym	Definition
BSC	Balancing and Settlement Code
BSCP	Balancing and Settlement Code Procedure
NCC	National Consumer Council
SLC	Standard Licence Conditions
WD	Working Day

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
3	Decision to modify the Standard Licence Conditions following the abolition of the National Consumer Council	https://www.ofgem.gov.uk/publications-and-updates/decision-under-section-11a-electricity-act-1989-and-section-23-gas-act-1986-modification-licences-following-abolition-national-consumer-council?utm_source=Ofgem%20Website%20Mailing%20List&utm_campaign=d4ea6f08c1-Ofgem_Email_Alert2_24_2014&utm_medium=email&utm_term=0_a9e586c268-d4ea6f08c1-376723873
3	Link to Standard Licence Conditions	https://www.ofgem.gov.uk/licences-codes-and-standards/licences/licence-conditions
3	Link to Transmission Licence	https://epr.ofgem.gov.uk//Content/Documents/Electricity%20transmission%20full%20set%20of%20consolidated%20standard%20licence%20conditions%20-%20Current%20Version.pdf

Appendix 2: Estimated Progression Effort

The following tables contain the estimated effort in progressing P301:

Assessment Effort	
Participant	Effort (man days)
ELEXON	6
Total	6