

## CP1438 'Clarification of information required for raising a Trading Dispute'

**ELEXON**



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### About This Document

This document is the CP1438 Final CP Report which ELEXON has published following the final decision from the TDC to approve the CP.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the TDC's views on the proposed changes and the views of respondents to the CP Consultation, along with the final decision on whether to approve this change.
- Attachment A contains the approved redlined changes to deliver the CP1438 solution.
- Attachment B contains the full responses received to the CP Consultation.

CP1438  
Final CP Report

2 July 2015

Version 1.0

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# 1 Why Change?

## Background

The [Trading Disputes](#) process provides a mechanism for correcting identified Settlement Errors and allows for energy that was incorrectly calculated to be re-calculated, and the corrected Trading Charges distributed accordingly. Balancing and Settlement Code (BSC) Procedure (BSCP) [11 'Trading Disputes'](#) sets out the procedures that need to be followed when raising and progressing a Trading Dispute.

A 'lessons learned' exercise was conducted following consideration of Trading Dispute DA618. This exercise took into account the views of both [BSC Panel](#) Members and [TDC](#) Members. It identified ambiguities in the documentation underpinning the Trading Disputes process and recommended that BSCP11 be amended to clarify the requirements associated with raising a Trading Dispute. The Panel endorsed the findings of this work at its meeting on 11 September 2014 ([Panel 228](#)).

## What is the issue?

When raising a Trading Dispute, BSCP11 Section 5.1.1 requires a Raising Party to "Identify [the] alleged Settlement Error and raise a Trading Dispute" using Form BSCP11/01 and in accordance with BSCP11 Section 1.4. However, the wording of Section 1.4 does not make it clear that the alleged Settlement Error must be identified, and this is only implied in the BSCP11/01 Trading Dispute form. These inconsistencies can impact the efficient investigation into alleged Trading Disputes and therefore need to be addressed.

# 2 Solution

## Proposed solution

[CP1438 'Clarification of information required for raising a Trading Dispute'](#) was raised by ELEXON on 30 March 2015.

This CP seeks to remove ambiguity and clarify that all BSCP11/01 Trading Dispute Forms submitted must identify a breach of the BSC or a Code Subsidiary Document (CSD) and indicate the relevant Settlement Error, in order for the form to be accepted by ELEXON. This will be done by aligning Sections 1.4 and 5.1.1 in BSCP11 and updating the BSCP11/01 Trading Dispute form to ensure it is consistent with these sections.

## Proposed redlining

The approved redlined changes to BSCP11 can be found in Attachment A.

## 3 Impacts and Costs

### Central impacts and costs

The central implementation cost for CP1438 will be approximately £240 (one ELEXON man day) to deliver the proposed document changes. There are no central system or BSC Agent impacts.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none"><li>BSCP11</li></ul>	<ul style="list-style-type: none"><li><i>None</i></li></ul>

### BSC Party & Party Agent impacts and costs

One respondent to the CP Consultation indicated that there will be minor administrative changes required to implement CP1438, resulting in minimal cost to their organization. There were no other implementation impacts or costs to BSC Parties or Party Agents identified.

For the avoidance of doubt, CP1438 will not affect any Trading Disputes that are raised or ongoing prior to the implementation of the CP (should it be approved).

## 4 Implementation Approach

### Recommended Implementation Date

The Implementation Date for CP1438 is:

- 5 November 2015** as part of the November 2015 BSC Systems Release

All but one of the nine respondents to the CP Consultation agreed with an Implementation Date of 5 November 2015 for CP1438. The one respondent who did not agree required clarification around the intention of the CP, as noted in Section 6.

### TDC's initial views

ELEXON presented CP1438 to the TDC at its meeting on 30 April 2015 ([TDC200/04](#)).

The TDC agreed with the proposed changes to BSCP11 and did not provide any further comments. TDC Members noted that CP1438 will be issued for CP consultation on 5 May 2015 and that the TDC will consider all consultation responses at its meeting on 2 July 2015.

## 6 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment B.

Summary of CP1438 Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1438 proposed solution?	8	1	0	0
Do you agree that the draft redlining delivers the intent of CP1438?	7	2	0	0
Will CP1438 impact your organisation?	2	6	0	1
Will your organisation incur any costs in implementing CP1438?	1	8	0	0
Do you agree with the proposed implementation approach for CP1438?	8	1	0	0
Do you have any further comments on CP1438?	1	8	0	0

### Views on the proposed solution

All but one of the nine respondents agreed with the CP1438 proposed solution.

One respondent noted that the proposed changes reduce ambiguity in the process of raising a Trading Dispute. Another respondent agreed with the principle that this clarification in the Trading Disputes process is beneficial.

One respondent did not agree with CP1438 and was concerned about whether or not general Trading Disputes will be allowed should this CP be implemented. They note that disputes may arise due to a combination of circumstances that of themselves do not breach a specific section of the Code, but may break the overall intent to ensure accurate Settlement. ELEXON has replied to the respondent and advised that it is not possible, under the current provisions, for a Trading Dispute to be raised without there being a breach of a specific Code Section or a CSD.

### Comments on the proposed redlining

Comments on the CP1438 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP11/01 Form	Suggest form BSCP11/01 would align better with the BSCP11 if the additional section – "Nature of the alleged Settlement Error" – was included.	ELEXON agrees with this view and has added "Nature of alleged Settlement Error" into the application form in Attachment A.

### TDC's final views

ELEXON presented CP1438 to the TDC at its meeting on 2 July 2015 ([TDC202/05](#)).

The TDC noted the views provided by CP Consultation respondents and agreed with the proposed amendment to the draft redlining for BSCP11. TDC Members did not provide any further comments.

### Final decision

The TDC has:

- **APPROVED** CP1438 for implementation on 5 November 2015, as part of the November 2015 BSC Systems Release.

## Appendix 1: Glossary & References

### Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code
BSCP	Balancing and Settlement Code Procedure ( <i>Code Subsidiary Document</i> )
CSD	Code Subsidiary Document
CP	Change Proposal
CPC	Change Proposal Circular
TDC	Trading Disputes Committee ( <i>Panel Committee</i> )

### 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
2	Trading Disputes information page on the ELEXON website	<a href="https://www.elexon.co.uk/reference/technical-operations/trading-settlement/claims-disputes/">https://www.elexon.co.uk/reference/technical-operations/trading-settlement/claims-disputes/</a>
2	BSCPs page on the ELEXON website	<a href="https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/">https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/</a>
2	BSC Panel page on the ELEXON website	<a href="https://www.elexon.co.uk/group/the-panel/">https://www.elexon.co.uk/group/the-panel/</a>
2	CP1438 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1438/">https://www.elexon.co.uk/change-proposal/cp1438/</a>
2	BSC Panel 228 meeting page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/bsc-panel-228/">https://www.elexon.co.uk/meeting/bsc-panel-228/</a>
2	TDC page on the ELEXON website	<a href="https://www.elexon.co.uk/group/trading-disputes-committee-tdc/">https://www.elexon.co.uk/group/trading-disputes-committee-tdc/</a>
4	TDC200 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/tdc-200/">https://www.elexon.co.uk/meeting/tdc-200/</a>