

CP1494 'Introduction of an objection window for Housekeeping Change Proposals'



Contact**Cal Lynn**

020 7380 4206

cal.lynn@elexon.co.uk

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About This Document

The purpose of this Change Proposal (CP) Consultation for CP1494 is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP1494. The Imbalance Settlement Group (ISG) and Supplier Volume Allocation Group (SVG) will then consider the consultation responses before making a decision on whether or not to approve CP1494.

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 ISG and SVG's initial views on the proposed changes.
- Attachment A contains the proposed redlined changes to deliver the CP1494 solution.
- Attachment B contains the specific questions on which we seek your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish to be considered.



What is a Housekeeping Change?

[Balancing and Settlement Code Procedure \(BSCP\) 40 'Change Management'](#) section 2.2 defines a Housekeeping Change as: *"the correction of manifest errors, minor errors and inconsistencies, including typographical errors (e.g. punctuation errors, spelling mistakes, incorrect font, incorrect capitalisation) incorrect cross-referencing, and the removal of redundant text"*.

Background

The evolution of the current rules for 'housekeeping' changes

In 2005, [CP1073 'Introduction of a Housekeeping Process into BSCP40'](#) first introduced the concepts of Housekeeping CPs and Housekeeping Changes into [Balancing and Settlement Code Procedure \(BSCP\) 40 'Change Management'](#). It argued that, for efficiency, CPs containing only 'housekeeping' changes (such as correcting typographical errors) should not be subject to the full CP process. It therefore introduced the rules that:

- Housekeeping CPs do not undergo industry Impact Assessment before they are approved; and
- the relevant Panel Committee¹ decides whether a CP should be progressed as a Housekeeping CP.

In 2007, [CP1170 'Improving the BSC Change Process'](#) (which made other, wider changes to the CP process in BSCP40) removed the original CP1073 requirement that Housekeeping CP redlining should undergo industry review after approval of the Housekeeping CP. It did not otherwise change the CP1073 definitions of a Housekeeping CP or a Housekeeping Change, which are today defined in BSCP40 as follows:

- 'Housekeeping' CP – a Change Proposal which, if approved, would result in a Housekeeping Change to one or more Configurable Items in the Baseline Statement². Housekeeping CPs will be published on the BSC Website and require Committee approval.'
- 'Housekeeping' Change – involves the correction of manifest errors, minor errors and inconsistencies, including typographical errors (e.g. punctuation errors, spelling mistakes, incorrect font, incorrect capitalisation) incorrect cross-referencing, and the removal of redundant text.'

In 2013, Balancing and Settlement Code (BSC) Modification [P296 'Introduction of a 'Fast Track' Modification Process following the outcomes of the Code Governance Review \(Phase 2\)'](#) introduced changes to the process for 'housekeeping' Modification Proposals.

Before P296, any minor 'housekeeping' changes to the BSC had to follow the same progression rules as any other Modification Proposal. P296 introduced the ability for the Panel to approve 'housekeeping' changes to the BSC, without industry consultation, through a Fast Track Self-Governance Modification Proposal.³

¹ The relevant Panel Committee will decide whether a CP should be progressed as a Housekeeping CP'.

² The Baseline Statement lists each Configurable Items under BSCP40 change management along with its responsible Committee(s).

³ Defined in [Annex X-1](#) of the BSC as a Modification Proposal which:

- meets the BSC's Self-Governance Criteria;
- rectifies manifest errors or corrects minor inconsistencies in, or makes other minor consequential changes to, the BSC; and
- is required to correct an error in the BSC or as a result of a factual change, including but not limited to:
 - updating names or addresses;
 - correcting minor typographical errors;
 - correcting formatting and consistency errors, such as paragraph numbering; or
 - updating out of date references to other documents or paragraphs.

P296 also introduced a 15 Working Day (WD) objection window for Fast Track Self-Governance Modification Proposals, starting from the date that ELEXON notifies Parties of the Panel's approval. During this window, Parties can object to the Panel's approval on the basis that the Modification Proposal does not satisfy the Fast Track Self-Governance Criteria. Where an objection is received, the Panel must then put the Modification Proposal through the normal progression process including an industry consultation. Because of the objection process, P296 specified that the proposed Implementation Date for a Fast Track Self-Governance Modification Proposal must not be earlier than 16 WDs after the date that ELEXON provides notification of the Panel's approval.

The rules for Fast Track Self-Governance Modification Proposals are set out in [BSC Section F paragraph 7](#).

What is the issue?

Currently, Parties have the ability to object to Modification 'housekeeping' changes only and not Housekeeping CPs. This creates inconsistent governance principles between the Modification and CP processes. ELEXON is seeking to introduce an equivalent 15 WD objection window into the Housekeeping CP process in BSCP40.

ELEXON still believes that an industry consultation is not needed for Housekeeping CPs. However, we are seeking to introduce an objection window into the process.

Proposed solution

[CP1494 'Introduction of an objection window for Housekeeping Change Proposals'](#) was raised by ELEXON on 13 September 2017.

We propose to amend BSCP40 (sections 3.4 and 3.5) to introduce a 15 WD objection window for Housekeeping CPs. Our proposed objection process is broadly in line with the Fast Track Self-Governance Modification Proposals process. In particular:

- The objection window will be 15 WDs from the date that ELEXON notifies participants of the relevant Panel Committee's approval of the Housekeeping CP;
- BSC Change Administrators (BCAs) and Party Agent Change Administrators (PACAs) may only object to a Housekeeping CP on the basis that it does not satisfy BSCP40's definition of a Housekeeping Change. PACAs do not have the power to raise a change however, as they are included in the Impact Assessment we believe they should have the power to object;
- Because of the objection window, the Implementation Date for a Housekeeping CP shall not be earlier than 16 WDs after the date that ELEXON notifies participants of the Panel Committee's decision;
- If no objections are received, the Housekeeping CP will be implemented as planned; and
- If an objection is received, ELEXON will progress the CP through the normal non-Housekeeping process – going through the CP Consultation and then Panel Committee decision processes as a non-Housekeeping CP.

Attachment A contains the proposed redlined changes to BSCP40.

CP Consultation Question

Do you agree with the CP1494 proposed solution?
Please provide your rationale.

[We invite you to give your views using the response form in Attachment B](#)

Proposer's rationale

We believe that it is 'good governance' to include such an objection window under the Housekeeping process for CPs as it ensures the industry has the opportunity to challenge whether changes should be classed as Housekeeping; something at present they cannot do.

We also believe that it is pragmatic to better align the CP and Modification processes for Housekeeping/Fast Track Self-Governance changes. This ensures consistency within our change processes as well as the governance of these processes.

Proposed redlining

Attachment B contains the proposed changes to BSCP40 to deliver CP1494.

The attached redlining has been done against BSCP40 version 15.0.

CP Consultation Question

Do you agree that the draft redlining delivers the CP1494 proposed solution?

If 'No', please provide your rationale.

We invite you to give your views using the response form in Attachment B

3 Impacts and Costs

Central impacts and costs

Central impacts

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP40	<ul style="list-style-type: none">N/A

Central costs

The implementation costs for CP1494 are approximately £240 (one ELEXON WD of effort) to make the required document changes.

BSC Party & Party Agent impacts and costs

We do not anticipate any direct impacts on BSC Parties or Party Agents and seek confirmation of this in the consultation.

CP Consultation Questions

Will CP1494 impact your organisation?

If 'Yes', please provide a description of the impact(s) on your organisation and any activities which you will need to undertake between the approval of CP1494 and the CP1494 Implementation Date (including any necessary changes to your systems, documents and processes). Where applicable, please state which of the roles that you operate as will be impacted and any differences in the impacts between each role.

Will your organisation incur any costs in implementing CP1494?

If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs.

We invite you to give your views using the response form in Attachment B

4 Implementation Approach

Recommended Implementation Date

ELEXON suggests that the solution to CP1494 be delivered on **22 February 2018** as part of the February 2018 BSC Release. This is the next available Release that can include this CP.

CP Consultation Question

Do you agree with the proposed implementation approach for CP1494?

Please provide your rationale.

We invite you to give your views using the response form in Attachment B

ISG's initial views

The ISG considered CP1494 at its meeting on 25 September 2017 ([ISG198/09](#)).

One member asked whether the Housekeeping CP process could be accelerated by adopting the approach taken under the [Master Registration Agreement \(MRA\)](#) change process. He believed the MRA process put the onus on parties to proactively respond and that this might be a better way than the objection window proposed under CP1494. The member was concerned that Parties may not review Housekeeping CPs.

An ISG Member commented that under the MRA, the MRA Development Board (MDB) decides how long to issue impact assessments for MRA changes. Typically MRA Housekeeping Changes will be issued for a 10 WD impact assessment. At the following MBD meeting the committee then decides whether to approve or reject the change, taking account of the consultation responses.

ELEXON commented that it supported aligning processes across Codes where appropriate. However, the purpose of this CP is to align the Housekeeping CP process with the existing Fast Track Self-Governance (housekeeping) Modification Proposal process and to introduce the opportunity for Parties to object to a CP being treated as Housekeeping (something they can only currently do for 'housekeeping' Modifications, not Housekeeping CPs).

ELEXON commented that the BSC approach to Housekeeping had deliberately been designed to reduce the effort required from participants, by not requiring a consultation. ELEXON believed that the Housekeeping CP timescales proposed by CP1494 were no longer (and, where no Party raises an objection, were quicker) than the MRA approach. ELEXON also noted that BSCP40 also allows non-Housekeeping CPs to be expedited where justified. The ISG agreed to keep the redlining as drafted.

The ISG did not provide any further comments or additional questions to include in the consultation.

SVG's initial views

The SVG considered CP1494 at its meeting on 3 October 2017 ([SVG200/06](#)).

One SVG member asked what had prompted this CP being raised. ELEXON noted that this CP had been raised in order to align the CP process with the Modification process, as Parties have the ability to object to Modification 'housekeeping' changes only and not Housekeeping CPs. ELEXON believes it is pragmatic to align the CP and Modification processes as it ensures consistency within our change processes as well as the governance of these processes.

The SVG did not provide any further comments or additional questions to include in the consultation.

Appendix 1: Glossary & References

Acronyms

Acronyms	
Acronym	Definition
BCAs	BSC Change Administrators
BSC	Balancing and Settlement Code
BSCP	Balancing and Settlement Code Procedure
CP	Change Proposal
CPC	Change Proposal Circular
ISG	Imbalance Settlement Group (<i>Panel Committee</i>)
MRA	Master Registration Agreement
MDB	MRA Development Board
PACA	Party Agent Change Administrators
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)
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
2	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/?show=all
2	CP1073 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1073-introduction-of-a-housekeeping-process-into-bscp40/
2	CP1107 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1107-timescale-change-to-the-100kw-notification-from-nhhdc/
2	P296 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p296/
2	BSC Sections page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/
8	ISG198 page on the ELEXON website	https://www.elexon.co.uk/meeting/isg-198/
8	MRA page on the MRASCo website	https://www.mrasco.com/mra-products/master-registration-agreement

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External Links		
Page(s)	Description	URL
8	SVG200 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-200/