

4.3 CP Form

Change Proposal – BSCP40/02	CP No: 1494 <i>Version No: 1.0</i> <i>(mandatory by BSCCo)</i>
Title (mandatory by originator) ‘Introduction of an objection window for Housekeeping Change Proposals’	
Description of Problem/Issue (mandatory by originator) <u>Background: the evolution of the current rules for Housekeeping Changes</u> 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: <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 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.’ 	

¹ I.e. the Panel Committee(s) listed on the Baseline Statement as being responsible for the Configurable Item(s) impacted by the Housekeeping CP, and therefore responsible for approval of the CP. The Baseline Statement lists each Configurable Items under BSCP40 change management along with its responsible Committee(s).

² ‘The relevant Panel Committee will decide whether a CP should be progressed as a Housekeeping CP’.

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 ‘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

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](#).

The issue: lack of objection process for Housekeeping CPs

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 (mandatory by originator)

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

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.

<p>of the relevant Panel Committee's approval of the Housekeeping;</p> <ul style="list-style-type: none"> • 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; • 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 none Housekeeping process going to CP Consultation and then Panel Committee decision processes as a non-Housekeeping CP. <p>Attachment B contains the proposed redlined changes to BSCP40.</p>
<p>Justification for Change (mandatory by originator)</p> <p>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.</p> <p>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.</p>
<p>To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code? (mandatory by originator)</p> <p>BSC Section F 'Modification Procedures'.</p>
<p>Estimated Implementation Costs (mandatory by BSCCo)</p> <p>The implementation costs for CP1494 are approximately £240 (one ELEXON working day of effort) to make the required document changes.</p>
<p>Configurable Items Affected by Proposed Solution(s) (mandatory by originator)</p> <p>BSCP40 'Change Management'.</p>
<p>Impact on Core Industry Documents or System Operator-Transmission Owner Code (mandatory by originator)</p> <p>None.</p>
<p>Related Changes and/or Projects (mandatory by BSCCo)</p> <p>None.</p>

Requested Implementation Date (mandatory by originator)

We are recommending an Implementation Date of 22 February 2018, as part of the February 2018 Release.

Reason:

This is the next Release that can accommodate this CP.

Version History (mandatory by BSCCo)

This is version 1.0 of CP1494.

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Date *13 September 2017*

Attachments: **Y/N*** (If Yes, No. of Pages attached: 5 – BSCP40 draft redlining)

(delete as appropriate)