

INITIAL WRITTEN ASSESSMENT for Modification Proposal P226 'Improving Large Combustion Plant Directive Information Disclosure'

Prepared by: ELEXON Limited¹

Date of Issue:	05 September 2008	Document Reference:	P226IR
Reason for Issue:	For Panel Decision	Version Number:	1.0

This document has been distributed in accordance with Section F2.1.10 of the Balancing and Settlement Code.²

P226 seeks to enhance the visibility of key Large Combustion Plant Directive (LCPD) emission limit/allocations and operating hours data by publishing such data on the Balancing Mechanism Reporting System (BMRS). In addition the proposal requires relevant BSC Parties to promptly inform the market (again via the BMRS) whenever they request changes to emission limits/allocations or subsequently have such changes granted under the relevant Emission Limit Value (ELV) or National Emission Reduction Plan (NERP).

BSCCO'S RECOMMENDATIONS

On the basis of the initial assessment, BSCCo invites the Panel to:

- **DETERMINE that Modification Proposal P226 should be submitted to the Assessment Procedure;**
- **AGREE the Assessment Procedure timetable such that an Assessment Report should be completed and submitted to the Panel for consideration at its meeting of 11 December 2008;**
- **DETERMINE that the P226 Modification Group be formed from members of the SSMG Standing Modification Group; and**
- **AGREE the Modification Group Terms of Reference.**

¹ ELEXON Ltd fulfils the role of the Balancing and Settlement Code Company ('BSCCo'), pursuant to Annex X-1 of the Balancing and Settlement Code (the 'Code').

² The current version of the Code can be found at <http://www.elexon.co.uk/bscrelateddocs/BSC/default.aspx>.

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SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

As far as BSCCo has been able to assess, the following parties/documents are potentially impacted by Modification Proposal P226.

Please note that this table represents a summary of the full initial impact assessment results contained in Appendix 2.

Parties	Sections of the BSC	Code Subsidiary Documents
Distribution System Operators <input type="checkbox"/>	A <input type="checkbox"/>	BSC Procedures <input checked="" type="checkbox"/>
Generators <input checked="" type="checkbox"/>	B <input type="checkbox"/>	Codes of Practice <input type="checkbox"/>
Interconnectors <input type="checkbox"/>	C <input type="checkbox"/>	BSC Service Descriptions <input type="checkbox"/>
Licence Exemptable Generators <input checked="" type="checkbox"/>	D <input type="checkbox"/>	Party Service Lines <input type="checkbox"/>
Non-Physical Traders <input type="checkbox"/>	E <input type="checkbox"/>	Data Catalogues <input type="checkbox"/>
Suppliers <input type="checkbox"/>	F <input type="checkbox"/>	Communication Requirements Documents <input type="checkbox"/>
Transmission Company <input type="checkbox"/>	G <input type="checkbox"/>	Reporting Catalogue <input type="checkbox"/>
Party Agents		
Data Aggregators <input type="checkbox"/>	H <input type="checkbox"/>	Core Industry Documents
Data Collectors <input type="checkbox"/>	I <input type="checkbox"/>	Ancillary Services Agreement <input type="checkbox"/>
Meter Administrators <input type="checkbox"/>	J <input type="checkbox"/>	British Grid Systems Agreement <input type="checkbox"/>
Meter Operator Agents <input type="checkbox"/>	K <input type="checkbox"/>	Data Transfer Services Agreement <input type="checkbox"/>
ECVNA <input type="checkbox"/>	L <input type="checkbox"/>	Distribution Code <input type="checkbox"/>
MVRNA <input type="checkbox"/>	M <input type="checkbox"/>	Distribution Connection and Use of System Agreement <input type="checkbox"/>
BSC Agents		
SAA <input type="checkbox"/>	N <input type="checkbox"/>	Grid Code <input type="checkbox"/>
FAA <input type="checkbox"/>	O <input type="checkbox"/>	Master Registration Agreement <input type="checkbox"/>
BMRA <input checked="" type="checkbox"/>	P <input type="checkbox"/>	Supplemental Agreements <input type="checkbox"/>
ECVAA <input type="checkbox"/>	Q <input checked="" type="checkbox"/>	Use of Interconnector Agreement <input type="checkbox"/>
CDCA <input type="checkbox"/>	R <input type="checkbox"/>	BSCCo
TAA <input type="checkbox"/>	S <input type="checkbox"/>	Internal Working Procedures <input type="checkbox"/>
CRA <input type="checkbox"/>	T <input type="checkbox"/>	BSC Panel/Panel Committees
SVAA <input type="checkbox"/>	U <input type="checkbox"/>	Working Practices <input type="checkbox"/>
Teleswitch Agent <input type="checkbox"/>	V <input checked="" type="checkbox"/>	Other
BSC Auditor <input type="checkbox"/>	W <input type="checkbox"/>	Market Index Data Provider <input type="checkbox"/>
Profile Administrator <input type="checkbox"/>	X <input checked="" type="checkbox"/>	Market Index Definition Statement <input type="checkbox"/>
Certification Agent <input type="checkbox"/>		System Operator-Transmission Owner Code <input type="checkbox"/>
Other Agents		
Supplier Meter Registration Agent <input type="checkbox"/>		Transmission Licence <input type="checkbox"/>
Unmetered Supplies Operator <input type="checkbox"/>		
Data Transfer Service Provider <input type="checkbox"/>		

1 DESCRIPTION OF PROPOSED MODIFICATION

1.1 Background

The Large Combustion Plant Directive (LCPD) aims to reduce acidification, ground level ozone and particles throughout Europe by controlling emissions of sulphur dioxide (SO₂), oxides of nitrogen (NO_x) and particulate matter from large combustion plants (LCP). These include power stations, petroleum refineries, steelworks and other industrial processes running on solid, liquid or gaseous fuel. The revised LCPD, applies to combustion plants above 50MW thermal (MWth) running on solid, liquid and gaseous fuels and takes into account advances in combustion and abatement technologies.

The LCPD stipulates that:

1. New combustion plants must meet emission limit values (ELVs) given in the LCPD; and
2. Existing plants (i.e. those in operation pre-1987), can choose to meet the LCPD obligations by either:
 - Complying with ELVs for NO_x, SO₂, and particles; or
 - Operating within a 'National Plan'. That would set an annual national level of emissions calculated by applying the ELV approach to existing plants, on the basis of those plants' average actual operating hours, fuel used and thermal input. The National Emissions Reduction Plan (NERP) is the national plan for the UK.

On 1 January 2008 the NERP introduced the National Trading Scheme. This scheme ensures that "existing" Large Combustion Plants (See point 2 above) are able to trade their annual allowances for sulphur dioxide (SO₂), nitrogen oxides (NO_x) and particulates with other LCPs within the Scheme. The NERP forms part of the LCPD.

Operators of existing LCPs were given the option by the Department for Environment, Food and Rural Affairs (Defra) to decide whether to be:

1. Regulated under the annual mass-based NERP; or
2. Regulated under the concentration based Emission Limit Values (ELVs); or
3. To opt out by taking the limited life Derogation.

Ultimately 92 LCPs (operated by 40 different operators) opted for the NERP; 18 LCPs in Scotland, one in Northern Ireland and the remaining 73 in England and Wales.

Currently, NERP data is submitted to the Environment Agency (EA), who collates relevant data and produces the NERP report which is published on the EA's website.

P226 aims to ensure that data relating to NERP is made available to all interested parties in a manner that is efficient, effective and economically acceptable to all.

1.2 Modification Proposal

Issue:

As mentioned within the previous section, LCPs are required to report specific information relating to their limit/allocations and operating hours to the Environment Agency (EA). Although the EA reports these figures, there have been concerns that data published for the purposes of environmental compliance and reporting is unlikely to be in a form that is best suited to help market participants understand the supply-demand fundamentals of the wholesale electricity market. Issues highlighted by the Proposer include:

1. Market critical data is incomplete and not always in a form that is readily accessible or easy for BSC Parties or customers to understand;
2. Data is not published in a timely manner; and
3. Information relating to derogations applied for by Opted in LCP units is not provided.

Proposed Solution:

P226 was raised on 1 September 2008 by E-on UK plc ('the Proposer') and seeks to enhance the visibility of key LCPD emission limit/allocations and operating hours data. It seeks to do this through the publication of such data on the Balancing Mechanism Reporting System (BMRS) in a form that is readily understandable to the market. In addition, the proposal requires relevant BSC Parties to inform the market (again via the BMRS) whenever they request changes to emission limits/allocations or subsequently have such changes granted under the relevant ELV or NERP.

The proposal will make it mandatory for BSC Parties, that are responsible for the relevant BM units associated with LCPs (under the terms of the Directive), to supply the specified information to BSCCo every month not later than 28 days after the end of each calendar month, by electronic means.

The BSCCo will update the appropriate pages of the BMRS within a specified number of days (and maintain an accessible archive of past months' reports). Any corrections must be submitted, by the relevant BSC Party, within a specified number of days after the discovery of an error.

The BMRS report will cover the following information (the latter three pieces of information being updated when applicable as specified below):

1. A register of BM Units that are part of a LCP Unit under the terms of the Directive,
2. The status of each LCP Unit: a) Opted Out Plant, b) Opted In Plant under NERP, c) Opted In Plant under ELV,
3. The cumulative operational hours from 1 January 2008 to date for each LCP Unit,
4. The remaining operational hours for each LCP Unit for Opted Out Plant,
5. A summary of NERP allowances bought and sold since 1 January 2008 and over the last month,
6. Details of any derogation applications for each Opted In LCP Unit applied for but awaiting a decision, (including both applications for operation under Article 5(1) resulting from a delay in fitting Flue Gas Desuplurisation equipment, and from breakdown of existing FGD),
7. Details of any derogation applications for each Opted In LCP Unit that have been granted,
8. The latest emission limits for each Opted In LCP Unit.

In addition, derogation applications to the EA (point 6) or written receipt of any revised emissions limits/allocations from the EA (points 7 & 8) shall be submitted to the BSCCo for reporting purposes.

The intent is to impose these actions on those larger generators exporting on a regular basis, not any smaller LCP that will not have a significant impact on market expectations of capacity availability. It is anticipated that the Modification Group would wish to consider where such a threshold should be drawn.

The Modification Group may wish to consider whether this is sufficient to address the defect set out below or whether the scope should be widened somewhat through an alternative proposal.

2 AREAS FOR CONSIDERATION IN PROGRESSING MODIFICATION PROPOSAL

An initial assessment of P226 has identified the following areas which BSCCo recommends should be considered further during the progression of the Modification Proposal:

- Development and confirmation of the P226 solution to conclude what data will be submitted to BSCCo, which BSC Parties will be responsible for validating and processing the data and how the data will be presented on the BMRS;
- Implications for BSC Parties associated with LCPs (under the terms of the Directive);
- Implications for the Environment Agency (Will the obligation for BSC Parties, that have registered the relevant BM units associated with LCP (under the terms of the Directive), to supply the specified information to BSCCo every month have an impact on the EA and its ability to fulfil its role);
- System impact (including reporting implications for the BMRS) – for participants, Party Agents and BSC Agents;
- Identify impacts on any other codes or documentation (e.g. BSCPs, CoPs);
- Quantification of the benefits/disadvantages P226 (including Cost implications to the BMRS, BSCCo and BSC Parties);
- Scope of Modification (LCP units that will be included within the scope of this Modification i.e. License exempt / SVA BM units);
- Data ownership i.e. who will be responsible for data integrity?;
- Impacts of data inconsistency between the EA and the BMRS;
- Any alternative solution.

2.1 Environmental Considerations

By their very nature the use of Large Combustion Plants will have an impact on greenhouse emissions. Consequently, regulations and obligations have been set in place that limit their running hours. The impact on carbon emissions will have been considered separately when establishing these obligations.

These regulations and obligations sit outside the BSC, P226 does not seek in any way to amend those current regulations or obligations surrounding LCPs and will have no direct impact on the running hours of LCPs.

P226 merely seeks to increase transparency and relates to publication of data. The question therefore arises as to whether there is an impact on greenhouse emissions arising from publication of the data. It is suggested that the Group could try to identify scenarios where publication of such information may have an effect on greenhouse emissions arising from Party behaviour.

It is therefore suggested that any analysis undertaken by the P226 Modification Group on greenhouse emissions will be of a qualitative nature.

3 RATIONALE FOR BSCCO'S RECOMMENDATIONS TO THE PANEL

BSCCo believes that further consideration of P226 by a Modification Group is required in order to further consider, and consult upon, the areas raised by this IWA. As the areas for consideration are sufficiently defined, BSCCo recommends that P226 proceed to the Assessment Procedure.

BSCCo recommends that P226 be submitted for a 3 month Assessment Procedure.

It is estimated that progression of P226 will require:

- 3 Modification Group meeting[s];

- 1 industry consultation;
- 1 BSC Agent impact assessment[s];
- 1 Party/Party Agent impact assessment;
- 1 BSCCo impact assessment[s]; and
- 1 request for Transmission Company analysis.

The proposed timetable and estimated costs for the progression of P226 are shown in Appendix 3.

BSCCo recommends that the P226 Modification Group be formed from members of the Settlement Standing Modification Group (SSMG) supplemented by members with experience of the Distribution and exemptable generation issues.

BSCCo recommends that the areas for consideration raised by this IWA should form the basis of the Modification Group Terms of Reference, along with any additional areas proposed by the Panel.

4 TERMS USED IN THIS DOCUMENT

Other acronyms and defined terms take the meanings defined in Section X of the Code.

Acronym/Term	Definition
BMRS	Balancing Mechanism Reporting System
ELV	Emission Limit Value
LCPD	The Large Combustion Plant Directive (LCPD) (2001/80/EC)
MWth	Mega Watt Thermal
NERP	National Emission Reduction Plan

5 DOCUMENT CONTROL

5.1 Authorities

Version	Date	Author	Reviewer	Reason for Review
0.1	03/09/08	Stuart Holmes	Adam Lattimore	For peer review
0.2	04/09/08	Stuart Holmes	John Lucas	For technical review
0.3	dd/mm/yy			For quality review
1.0	dd/mm/yy	Change Delivery		For Panel decision

5.2 References

Ref.	Document Title	Owner	Issue Date	Version
1	[include hyperlink if available]		dd/mm/yy	

APPENDIX 1: MODIFICATION PROPOSAL

Modification Proposal – BSCP40/03	MP No: P226 (mandatory by BSCCo)
Title of Modification Proposal Improving Large Combustion Plant Directive Information Disclosure	
Submission Date 01 September 2008	
Description of Proposed Modification <p>This proposal seeks to enhance the visibility of key Large Combustion Plant Directive (LCPD) emission limit/allocations and operating hours data, which affects how BSC parties make such plants available to the market. It seeks to do this through the publication of such data on the Balancing Mechanism Reporting System (BMRS) in a form that is readily understandable to the market. In addition the proposal requires relevant BSC Parties to promptly inform the market (again via the BMRS) whenever they request changes to emission limits/allocations or subsequently have such changes granted under the relevant Emission Limit Value (ELV) or National Emission Reduction Plan (NERP). The intent is only to require these actions of those larger generators exporting on a regular basis, not any smaller LCP that will not have a significant impact on market expectations of capacity availability. It is anticipated that the Modification Group would wish to consider where such a threshold should be drawn.</p> <p>The proposal will make it mandatory for such BSC Parties, that have registered the relevant BM units associated with LCP (under the terms of the Directive), to supply the specified information to BSCCo every month not later than 28 days after the end of each calendar month³, by electronic means. The BSCCo will update the appropriate pages of the BMRS within [1]⁴ working day (and maintain an accessible archive of past months' reports). Any corrections must be submitted within [1]² working day of discovery of an error by the relevant BSC Party. The proposal will cover the following information (the latter three pieces of information being updated when applicable as specified below):</p> <ol style="list-style-type: none"> 1. A register of BM Units that are part of a LCP Unit under the terms of the Directive, 2. The status of each LCP Unit: a) Opted Out Plant, b) Opted In Plant under NERP, c) Opted In Plant under ELV, 3. The cumulative operational hours from 1 January 2008 to date for each LCP Unit, 4. The remaining operational hours for each LCP Unit for Opted Out Plant, 5. A summary of NERP allowances bought and sold since 1 January 2008 and over the last month, 6. Details of any derogation applications for each Opted In LCP Unit applied for but awaiting a decision, (including both applications for operation under Article 5(1) resulting from a delay in fitting Flue Gas Desuplurisation equipment, and from breakdown of existing FGD), 7. Details of any derogation applications for each Opted In LCP Unit that have been granted, 8. The latest emission limits for each Opted In LCP Unit. <p>In addition within 1 day, of its formal written submission of a derogation application to the Environment Agency (EA) (point 6) or written receipt of any revised emissions limits/allocations from the EA (points 7 & 8), the relevant BSC Party shall notify the details of such notices to BSCCo. BSCCo shall update the relevant report within [1]² working day of receipt of such information.</p> <p>Suggested layouts for new BMRS reports setting out the above information are shown in Attachments (A (Opt-Outs Summary.xls), B (Opt-Ins Summary.xls) and C (Opt-Ins Transfers.xls)). The proposer has reviewed current LCPD data available and has sought to focus only on those areas that might be considered to be market critical. The Modification Group may wish to consider whether this is sufficient to address the defect set out below or whether the scope should be widened somewhat through an alternative proposal.</p>	

³ This is the normal timetable for submission of data to the Environment Agency (EA) and where such a timetable applies BSCCo could simply receive a copy of the EA submission. The Modification Group may wish to consider if a more prompt timescale might be achievable; 28 days after calendar month end is suggested as a maximum.

<p>Description of Issue or Defect that Modification Proposal Seeks to Address</p> <p>Although some operating hours data is made available on the Environment Agency website such 'market critical' data is incomplete and not always in a form that is readily accessible or easy for BSC Parties or customers to understand. It also takes quite some time to publish this data (typically 6 weeks after the month to which the data relates).</p> <p>In addition there have been instances where BSC Parties have made wrong assumptions about likely plant availability because they were unaware of derogations applied for Opted In LCP Units (e.g. in cases where there has been a delay to the schedule for fitting flue gas desulphurisation (FGD) equipment at such stations; breakdown of such equipment could also result in this situation).</p>
<p>Impact on Code <i>(optional by originator)</i></p> <p>Section V shall be impacted as a result of additional reporting requirements being included within the BMRS.</p>
<p>Impact on Core Industry Documents or System Operator-Transmission Owner Code <i>(optional by originator)</i></p> <p>None expected.</p>
<p>Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties <i>(optional by originator)</i></p> <p>Changes will be required to the BMRS system.</p>
<p>Impact on other Configurable Items <i>(optional by originator)</i></p> <p>None expected.</p>
<p>Justification for Proposed Modification with Reference to Applicable BSC Objectives <i>(mandatory by originator)</i></p> <p>The proposed modification will better facilitate Objective C, related to 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, by improving accessibility and transparency of information on likely availability of generation capacity.</p> <p>The LCPD is having a profound affect on how generators choose to run their stations and it is important that market participants and customers have full visibility of current and applied for emission limits/allocations and operating hours data for all LCP Units so that informed assessments can be made on market fundamentals. The requirement that BSC parties must promptly inform the market of any derogations applied for will remove the asymmetry of information that currently favours the applicant who has full knowledge of the potential greater scope for more generation output under any revised limits and could conceivably trade 'off-the-back of' such information. Removing the scope for such behaviour as well as general improvements in information transparency should enhance competition and the efficiency of the wholesale generation market in general.</p>
<p>Urgency Recommended: No <i>(optional by originator)</i></p>

⁴ The EA typically publish data within 2 weeks, but as 'market critical' could be published earlier by BSSCo. Other data e.g. on NERP allocations are only published quarterly and the proposal envisages earlier publication of relevant data.

<p>Justification for Urgency Recommendation <i>(mandatory by originator if recommending progression as an Urgent Modification Proposal)</i> n/a</p>
<p>Details of Proposer:</p> <p>Name.....Peter Bolitho.....</p> <p>Organisation.....E.ON UK plc.....</p> <p>Telephone Number.....024 7618 3384.....</p> <p>Email Address.....peter.bolitho@eon-uk.com.....</p>
<p>Details of Proposer’s Representative:</p> <p>Name.....Esther Sutton.....</p> <p>Organisation.....E.ON UK plc.....</p> <p>Telephone Number....024 7618 3440.....</p> <p>Email address.....esther.sutton@eon-uk.com.....</p>
<p>Details of Representative’s Alternate:</p> <p>Name.....</p> <p>Organisation.....</p> <p>Telephone Number.....</p> <p>Email address.....</p>
<p>Attachments: Yes <i>(mandatory by originator)</i></p> <p>If Yes, Title and No. of Pages of Each Attachment: Appendix A – Example of Opt Out Summary (1 pg) Appendix B – Example of Opt In Summary (1 pg) Appendix C – Example of Opt In Transfer (1 pg)</p>

APPENDIX 2: INITIAL ASSESSMENT OF IMPACTS OF MODIFICATION PROPOSAL

An initial assessment has been undertaken by BSCCo in respect of all BSC systems, documentation and processes. The following have been identified as being potentially impacted by P226.

a) Impact on BSC Systems and Processes

BSC System / Process	Potential Impact of Proposed Modification
Balancing Mechanism Reporting System (BMRS)	Reporting system requirements may need to be included/updated within the BMRS

b) Impact on BSC Agent Contractual Arrangements

BSC Agent Contract	Potential Impact of Proposed Modification
LogicaCMG (BMRA)	To be determined at Modification Group Meetings

c) Impact on BSC Parties and Party Agents

It is anticipated that P226 will have an impact on:

- **Generators:** BSC Parties that have registered the relevant BM units associated with LCP (under the terms of the Directive), will be required to supply the specified information to BSCCo every month.
- **BSC Agent:** Initial feedback from the BSC Agent suggests that detailed impacts will only be possible to identify during the initial Modification Group meetings.

d) Impact on Transmission Company

No potential impact

e) Impact on BSCCo

Area of Business	Potential Impact of Proposed Modification
Corporate Services	Providing project assurance for the implementation of this modification.
Legal	Advising the Modification Group and drafting legal text.
Change Implementation	Manage and implement that change as part of a planned release. Manage the service provider whilst they deliver and test the software change. Review redlined changes to Service Provider documents and implement non-software changes.

f) Impact on Code

Code Section	Potential Impact of Proposed Modification
V	The requirement on BMRS to report LCPD data will sit naturally in Section V
Q	The requirement on Parties to provide the data would probably fit most naturally in Section Q
X	Changes to definitions

g) Impact on Code Subsidiary Documents

Document	Potential Impact of Proposed Modification
BSCP	Depending on the solution adopted for submitting data a new BSCP may also be required to describe the procedural aspects.

h) Impact on Core Industry Documents and Other Documents

No potential impact

i) Impact on Other Configurable Items

No potential impact

j) Impact on BSCCo Memorandum and Articles of Association

No potential impact

k) Impact on Governance and Regulatory Framework

No potential impact

APPENDIX 3: COSTS AND TIMETABLE FOR PROGRESSION**ESTIMATED COSTS OF PROGRESSING MODIFICATION PROPOSAL⁵**

Meeting Cost	£1500
Legal/Expert Cost	£0
Impact Assessment Cost	£15,000
ELEXON Resource	75 man days £20,000

Proposed P226 Timetable for progression

⁵ Clarification of the meanings of the cost terms in this appendix can be found on the BSC Website at the following link:
http://www.elexon.co.uk/documents/Change_and_Implementation/Modifications_Process_-_Related_Documents/Clarification_of_Costs_in_Modification_Procedure_Reports.pdf

