



## FINAL MODIFICATION REPORT for Modification Proposal P225 Housekeeping Modification: Updating References to the Party Service Lines

Prepared by ELEXON on behalf of the BSC Panel

<b>For Authority Decision</b>	Date of Issue	<b>10 July 2008</b>	Version Number	<b>1.0</b>
For Attention Of	<b>The Authority</b>			
<b>Overview or Purpose of Document:</b>				
<p><b>Proposed Modification P225</b> seeks to update the references to Party Service Lines within the BSC, to reflect the new location of requirements in the Code Subsidiary Documents. P225 would remove the Party Service Lines 110, 120, 130, 140, 150, 160, 170 and 180 from the BSC and Baseline Statement. P225 also removes manifest errors in references from the definitions Section of the Code.</p> <p>No Alternative Modification has been developed.</p>				
<b>BSC Panel's Recommendations</b>				
Having considered and taken into due account the contents of the P225 draft Modification Report, the BSC Panel recommends:				
<ul style="list-style-type: none"><li>• <b>that Proposed Modification P225 should be made;</b></li><li>• <b>an Implementation Date for Proposed Modification P225 of 06 November 2008 if an Authority decision is received on or before 5 November 2008, or 1 Working Day after an Authority decision is received, if the Authority decision is received after 5 November 2008;</b></li><li>• <b>the proposed text for modifying the Code, as set out in the Modification Report.</b></li></ul>				
Contact	Ysanne Hills	 <a href="mailto:ysanne.hills@elexon.co.uk">ysanne.hills@elexon.co.uk</a>	 020 7380 4162	

## Contents

<b>BSC Panel's Recommendations</b> .....	<b>1</b>
<b>Summary of Impacted Parties And Documents</b> .....	<b>3</b>
<b>1 Description of Modification</b> .....	<b>4</b>
1.1 <b>Background</b> .....	<b>4</b>
1.2 <b>Proposed Modification</b> .....	<b>4</b>
<b>2 Implementation Approach and Costs</b> .....	<b>5</b>
2.1 <b>Costs</b> .....	<b>5</b>
2.2 <b>Impacts</b> .....	<b>5</b>
2.3 <b>Implementation Date</b> .....	<b>6</b>
2.4 <b>Legal Text</b> .....	<b>7</b>
<b>3 Rationale for Panel's Recommendations to the Authority</b> .....	<b>7</b>
3.1 <b>Panel's initial Consideration of the Modification Proposal</b> .....	<b>7</b>
3.2 <b>Results of Report Phase Consultation</b> .....	<b>7</b>
3.3 <b>Panel's Consideration of Draft Modification Report and Final Recommendation to the Authority</b> .....	<b>7</b>
<b>4 Document Control</b> .....	<b>8</b>
4.1 <b>Authorities</b> .....	<b>8</b>
<b>Appendix 1: Legal Text</b> .....	<b>9</b>
<b>Appendix 2: Process to be Followed</b> .....	<b>9</b>
<b>Appendix 3: Report Phase Consultation Responses</b> .....	<b>9</b>

### **Intellectual Property Rights, Copyright and Disclaimer**

The copyright and other intellectual property rights in this document are vested in ELEXON or appear with the consent of the copyright owner. These materials are made available for you for the purposes of your participation in the electricity industry. If you have an interest in the electricity industry, you may view, download, copy, distribute, modify, transmit, publish, sell or create derivative works (in whatever format) from this document or in other cases use for personal academic or other non-commercial purposes. All copyright and other proprietary notices contained in the document must be retained on any copy you make.

All other rights of the copyright owner not expressly dealt with above are reserved.

No representation, warranty or guarantee is made that the information in this document is accurate or complete. While care is taken in the collection and provision of this information, ELEXON Limited shall not be liable for any errors, omissions, misstatements or mistakes in any information or damages resulting from the use of this information or action taken in reliance on it.

## Summary of Impacted Parties And Documents

As far as BSCCo has been able to assess, the following parties/documents would be impacted by P225. Please note that this table represents a summary of the full impact assessment results contained in section 2.2.

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

## 1 Description of Modification

This section outlines the solution for the Proposed Modification, as set out in Modification Proposal P225.

### 1.1 Background

#### 1.1.1 PSL References

The Code Subsidiary Document (CSD) review highlighted that there is a large amount of duplication between the requirements contained in Party Service Lines (PSLs) and the corresponding Balancing and Settlement Code Procedures (BSCPs).

The Panel agreed the recommendations of the CSD review and the CSD Architecture Principles Document at their meeting on 8 June 2006 (Panel 115/08). These recommendations included:

- the creation single PSL, containing the non-functional requirements from the existing PSLs (PSL 100); and
- moving the functional requirements currently in the PSLs into the relevant BSCPs.

ELEXON has almost completed this work, by raising nine Change Proposals (CPs).

The CPs have created a new PSL, PSL100 ('Generic non functional requirements for Licensed Distribution System Operators and Party Agents') and moved the requirements in each of the existing PSLs into the following documents:

PSL	Requirements in this PSL have been moved into
PSL110 - SVA Meter Operation	PSL100, BSCP514, BSCP550, BSCP504 and SVA Data Catalogue vol. 1 and 2
PSL120 - Non Half Hourly Data Collection	PSL100 and BSCP504
PSL130 - Half Hourly Data Collection	PSL100, BSCP502 and BSCP550
PSL140 - Non Half Hourly Data Aggregation	PSL100 and BSCP505
PSL150 - Half Hourly Data Aggregation	PSL100 and BSCP503
PSL160 - Supplier Meter Registration Service	PSL100, BSCP501 and BSCP533 Appendix B
PSL170 - Meter Administrator	PSL100 and BSCP520
PSL180 - CVA Meter Operation	PSL100 and BSCP506

#### 1.1.2 Manifest Errors

Several manifest errors have been identified within the BSC. Most of these errors were introduced by P194 ('Revised Derivation of the 'Main' Energy Imbalance Price') when definitions in Section T were updated, but the corresponding changes were not made to Annex X-2.

### 1.2 Proposed Modification

For a full description of the original Modification Proposal as submitted by BSC Panel ('the Proposer'), and the background to the proposal, please refer Panel paper [141/06](#).

### 1.2.1 PSL References

This recommended housekeeping proposal aims to update the references to Party Service Lines within the BSC, to reflect the new location of requirements in the Code Subsidiary Documents.

This Modification would also fully remove Party Service Lines 110, 120, 130, 140, 150, 160, 170 and 180 from the BSC, and the Baseline Statement.

References to the PSLs within BSC537 Appendix 1 ('Self Assessment Document') have been updated for all of the PSLs, except PSL120. These references would be updated as a part of this Modification.

### 1.2.2 Manifest Errors

In addition, P225 would correct manifest errors which have been identified in BSC Annex X-2, tables X-2 and X-3; this will mean correcting the labelling of 13 pricing terms. The current labelling of these terms are considered manifest errors, because they could cause confusion for Parties as they are inconsistent with Section T.

### 1.2.3 Applicable BSC Objectives

In accordance with section F2.1.1 (d) (iv) of the BSC, BSCCo recommended to the Panel that these revisions will remove any potential for confusion arising from the BSC references and will therefore better facilitate Applicable Objective (d) by ensuring efficiency of the arrangements. The removal of inconsistent or anomalous references will also better facilitate Applicable Objective (c) by ensuring that there is clarity and transparency in the rules and processes which apply in relation to existing and potential future parties, including in relation to the development and/or operation of such systems and processes.

## 2 Implementation Approach and Costs

### 2.1 Costs

P225 merely seeks to update references within the BSC, to reflect the new locations of requirements in Code Subsidiary Documentation, therefore there are no costs associated with P225, other than the BSCCo costs for progressing the change, inclusive of the preparatory work in drafting and reviewing the change (18 man days, equating to £3,960).

### 2.2 Impacts

#### a Impact on BSC Systems and Processes

No impact.

#### b Impact on BSC Agents

No impact.

#### c Impact on BSC Parties and Party Agents

No impact. This Modification would not change the requirements on BSC Parties or Party Agents. It merely:

- corrects references to the PSLs within the BSC;
- reduces duplication (by removing the old PSLs); and

- corrects the labelling of some pricing terms in Section X-2.

**d Impact on Transmission Company**

No impact.

**e Impact on BSCCo**

BSCCo will be responsible for applying the changes.

**f Impact on Code**

Code Section	Impact of Proposed/Alternative Modification
K, L, S and X	<p>There are 31 references to the Party Service Lines in the BSC. This modification would correct each one, to reflect the new location of requirements.</p> <p>By updating the references, Party Service Lines 110, 120, 130, 140, 150, 160, 170 and 180 will be removed from the BSC.</p> <p>There are 13 manifest errors in section X-2, tables X-2 and X-3 that need to be corrected.</p>

A copy of the draft legal text to give effect to these changes can be found in Appendix 1.

**g Impact on Code Subsidiary Documents**

Document	Impact of Proposed/Alternative Modification
BSC537 Appendix 1 ('Self Assessment Document')	References to the PSLs within have been updated for all of the PSLs, except PSL120. It is recommended that these references are updated as part of this Modification.

**h Impact on Core Industry Documents/System Operator-Transmission Owner Code**

No impact.

**i Impact on Other Configurable Items**

No impact.

**j Impact on BSCCo Memorandum and Articles of Association**

No impact.

**k Impact on Governance and Regulatory Framework**

No impact.

**2.3 Implementation Date**

The last CPs that are moving requirements from the PSLs into BSCPs, will be implemented as part of the November 2008 Release. To align with these changes, ELEXON recommends the following implementation approach for P225:

- 06 November 2008 (the November Release) if an Authority decision is received on or before 5 November 2008; or
- 1 working day after an Authority decision is received, if it is received after 5 November 2008.

## **2.4 *Legal Text***

### **2.4.1 *Drafted text (for BSC changes)***

There are 31 references to the Party Service Lines in the BSC. This modification would correct these where necessary, to reflect the new location of requirements.

This Modification would remove Party Service Lines 110, 120, 130, 140, 150, 160, 170 and 180 completely from the BSC and the Baseline Statement.

The labelling of 13 terms related to pricing in BSC Annexes X-2, table X-2 and X-3 would be corrected, to align with Section T.

Appendix 1 (Draft Legal Text) sets out the proposed changes.

### **2.4.2 *CSD changes (not included in the legal text)***

References to the PSLs within BSC537 Appendix 1 ('Self Assessment Document') have been updated for all of the PSLs, except PSL120. The 12 references to PSL120 would be updated as part of this Modification.

## **3 *Rationale for Panel's Recommendations to the Authority***

### **3.1 *Panel's initial Consideration of the Modification Proposal***

Given that the changes are self evident, the Panel provided a unanimous initial recommendation that P225 should be made.

The Panel confirmed that they agreed that Applicable BSC Objectives (c) and (d) would be better facilitated by P225 for the reasons set out in the Modification Proposal (and section 1.2.3 of this paper).

### **3.2 *Results of Report Phase Consultation***

Five responses to the report phase consultation were received (from Imserv Europe, TMA, RWE Npower, Scottish Power and E.ON UK). The full responses are included in Appendix 3.

All five respondents agreed with the Panel's initial recommendations, and did not highlight any concerns.

### **3.3 *Panel's Consideration of Draft Modification Report and Final Recommendation to the Authority***

The Panel noted the consultation responses received and provided a unanimous final recommendation that P225 should be made.

The Panel reconfirmed that they agreed that Applicable BSC Objectives (c) and (d) would be better facilitated by P225 for the reasons set out in the Modification Proposal (and section 1.2.3 of this paper).

## 4 Document Control

### 4.1 *Authorities*

Version	Date	Author	Reviewer	Reason for Review
0.1	23/05/08	Ysanne Hills	David Jones	For technical review
0.2	12/06/08		BSC Parties and other interested parties	For consultation
0.3	04/07/08	Change Delivery	BSC Panel	For Panel decision
1.0	10/07/08	BSC Panel		For Authority decision

## Appendix 1: Legal Text

Draft legal text for the Proposed Modification is attached as a separate document, Attachment 1.

## Appendix 2: Process to be Followed

Date	Event
12/06/08	Modification Proposal raised by BSC Panel
12/06/08	Draft Modification Report issued for industry consultation
27/06/08	Report Phase consultation responses returned
10/07/08	Draft Modification Report presented to the Panel
10/07/08	Final Modification Report issued to the Authority for decision

ESTIMATED COSTS OF PROGRESSING MODIFICATION PROPOSAL <sup>1</sup>	
Meeting Cost	£ 0
Legal/Expert Cost	£ 0
Impact Assessment Cost	£ 0
ELEXON Resource	18 man days £ 3,960

These costs include those incurred by ELEXON through preparatory work prior to raising P225.

## Appendix 3: Report Phase Consultation Responses

The full Report Phase consultation responses are available below:

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	IMServ Europe	P225_dMR_01	0	6
2.	TMA	P225_dMR_02	0	2
3.	Scottish Power	P225_dMR_03	7	0
4.	RWE npower	P225_dMR_04	10	0
5.	E.ON UK	P225_dMR_05	5	0

### Question 1: Do you agree with the Panel's provisional recommendation to the Authority contained in the draft Modification Report that Proposed Modification P225 should be made?

#### Summary

Yes	No	Neutral/Other
5	0	0

#### Responses

<sup>1</sup> 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](http://www.elexon.co.uk/documents/Change_and_Implementation/Modifications_Process_-_Related_Documents/Clarification_of_Costs_in_Modification_Procedure_Reports.pdf)

Respondent	Response	Rationale
IMServ Europe	Yes	n/a
TMA	Yes	This is a housekeeping change
Scottish Power	Yes	n/a
RWE npower	Yes	The proposed modification addresses a number of inconsistencies in the code. It ensures the BSC references PSLs correctly, fulfilling BSC objective d.) Promoting Efficiency in implementation and administration of the Balancing and Settlement arrangements.
E.ON UK	Yes	This modification addresses drafting issues within the BSC which may cause confusion and so removing inconsistent or manifestly incorrect references is appropriate. This modification therefore better facilitates the BSC Objective (D) in delivering improvements in efficiencies in the BSC arrangements.

**Question 2: Do you agree with the Panel's provisional recommendation concerning the Implementation Date for P225?**

**Summary**

Yes	No	Neutral/Other
5	0	0

**Responses**

Respondent	Response	Rationale
IMServ Europe	Yes	n/a
TMA	Yes	As above
Scottish Power	Yes	n/a
RWE npower	Yes	As this is a housekeeping Modification, we agree with the implementation date, there will no impact on our systems or processes.
E.ON UK	Yes	Yes – since there are no system impacts the next release is appropriate.

**Question 3: Do you agree with the Panel's view that the legal text provided in the draft Modification Report correctly addresses the issue or defect identified in the Modification Proposal?**

**Summary**

Yes	No	Neutral/Other
5	0	0

#### Responses

Respondent	Response	Rationale
IMServ Europe	Yes	
TMA	Yes	
Scottish Power	Yes	
RWE npower	Yes	The legal text appears to address the inconsistencies accurately.
E.ON UK	Yes	

#### Question 4: Are there any further comments on P225 that you wish to make?

#### Responses

Respondent	Response	Rationale
IMServ Europe	No	
TMA	No	
Scottish Power	No	
RWE npower	No	
E.ON UK	No	