

INITIAL WRITTEN ASSESSMENT for Modification Proposal P231 'Black Start and Fuel Security Procedures under the Balancing and Settlement Code (BSC)'

Prepared by: ELEXON Limited¹

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

P231 aims to improve the transparency of the arrangements and obligations associated with a Black Start or Fuel Security Code (FSC) event, as the current detail in the BSC is high level. The P231 solution outlines the processes for confirming the duration of a Black Start / FSC event and to enable normal market operations to resume. The Proposal also clarifies the responsibilities of relevant participants.

BSCCO'S RECOMMENDATIONS

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

- **DETERMINE that Modification Proposal P231 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 09 April 2009;**
- **DETERMINE that the P231 Modification Group be formed from members of the Settlement Standing Modification Group and Governance Standing Modification Group (and should be the same Group that considers P232); and**
- **AGREE the Modification Group Terms of Reference.**

Potential impacts:

- **BSC Parties:** The Transmission Company, Generators, Suppliers, Licence Exemptable Generators, Licensed Distribution System Operators, Interconnector Administrators, Interconnector User and BSCCo.
- **BSC Agents:** Energy Contract Volume Aggregation Agent (ECVAA).

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 is available at <http://www.elexon.co.uk/bscrelateddocs/BSC/default.aspx>.

Purpose of this document:

This document is an Initial Written Assessment (IWA), which ELEXON will present to the Panel on 15 January 2009. The Panel will consider the recommendations and agree how P231 should be progressed.

CONTENTS TABLE

1	Why Change?	3
1.1	What is a Black Start?.....	3
1.2	What is a Fuel Security Code event?	3
2	P231 Solution	4
2.1	Duration of a Black Start or FSC event	4
2.2	return of normal market operations.....	5
3	Proposed Progression	5
3.1	Terms of Reference	5
3.2	Proposed timetable.....	6
3.3	Estimated Costs and Impacts	6
4	Recommendations	6
5	Terms Used in this Document	7
6	References	7
Appendix 1: Modification Proposal		8
Appendix 2: Initial Assessment of Impacts of Modification Proposal		11
Appendix 3: Costs and Timetable for Progression		13
Appendix 4: Legal Requirements Matrix		15
Appendix 5: Black Start Transition Diagram		18

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1 WHY CHANGE?

In the event of a Fuel Security or Black Start period Parties are expected to adhere to certain activities which are outlined within the Balancing and Settlement Code (BSC). [Issue 32 'Black Start'](#)³ and [Issue 33 'Fuel Security Code \(FSC\)'](#)⁴ were raised in order to consider and develop requirements to enable the BSC Panel, BSC Parties, BSCCo and BSC Agents to fulfil their obligations in a transparent and timely manner.

P231 seeks to clarify the following:

- How to define the duration of a Black Start or FSC event;
- How to return to normal market operations; and
- What are the obligations on relevant participants?

By providing clarity of the obligations and processes, affected Parties can work optimally together to ensure that normal market operations will 'go-live' in the shortest possible time.

A description of a Black Start and FSC event is included below in Section 1.1 and 1.2.

The Issue Groups also discussed the details of the claims processes and the calculation of a single imbalance price) under a Black Start / FSC event. The changes from these discussions are being progressed as Modification Proposal P232.

1.1 What is a Black Start?

A 'Black Start' is a recovery process for restoring electricity on the Transmission System. Power stations need electricity from the Transmission System to start up and maintain their generators. If the Transmission System collapses, power stations would be unable to keep their generators running and as a result power stations would stop producing electricity.

Certain power stations have contracts with National Grid where they will be able to initiate a Black Start if the Transmission System collapses. These power stations do not require an external source of energy to produce electricity. In most instances, such power stations would use diesel generators to start larger generators and start generating in small 'pockets' throughout the country. In turn these 'pockets' are gradually connected to each other until the Transmission System is fully energised.

1.2 What is a Fuel Security Code event?

A 'Fuel Security Code' (FSC) event occurs when the Secretary of State exercises his powers under sections 34 and 35 of the Electricity Act 1989, to direct power stations to operate in specific ways (for example a power station could generate more or less energy in order to balance the electricity grid) or to direct Transmission Licensees (National Grid). A FSC 'direction' can be issued to one or multiple participants and a single FSC direction or several distinct FSC directions can be issued.

Unless specified by the Department for Energy and Climate Change (DECC), formerly the Department for Business Enterprise and Regulatory Reform (BERR), information regarding a security period will be declared by National Grid to all impacted parties e.g. Generators, Distributors and other stakeholders.

³ Issue 32 Black Start Report – Please refer to the following Link: [Issue 32 Black Start Report](#)

⁴ Issue 33 Fuel Security Code – Please refer to the following Link: [Issue 33 Fuel Security code](#)

2 P231 SOLUTION

P231 was raised on 23 December 2008 by National Grid ('the Proposer').

P231 is based on the recommendations of the Issue 32/33 Standing Modification Groups and seeks to put in place clearer, detailed arrangements for managing a Black Start or Fuel Security event. This Modification deals with the:

- Duration of a Black Start or Fuel Security period;
- Return of normal market operation; and
- Clarification that complying with a Fuel Security direction would not lead to a breach of the BSC.

In clarifying these arrangements, P231 establishes the specific obligations during a Black Start or FSC event on:

- The BSC Panel;
- BSC Parties (Supplier's and Generators);
- BSC Agents;
- Interconnector Administrators and Users; and
- The Transmission Company.

2.1 Duration of a Black Start or FSC event

For a Black Start event, the BSC currently states that the Panel determines the Settlement Period where the Total / Partial Shutdown of the Transmission System commenced. In practice the Panel determination would simply be based on the Transmission Company's (National Grid) declaration. Therefore P231 proposes that the commencement of a Black Start Period is based on National Grid's declaration. National Grid will communicate this to all affected Parties including BSCCo, and no Panel determination will be required.

Following National Grid's declaration, BSCCo will be required to notify all BSC Parties of the beginning of the Black Start Period; BSCCo's notification will include details of Settlement Day and Settlement Period of the start of the Black Start. However, normal communication between BSCCo and the industry might be difficult at the start of the Black Start as the 'electricity grid' will begin to be re-energised and any available communication channels could suffer from congestion. Therefore BSCCo may only be able to communicate the commencement of the Black Start once the electricity grid is totally/ almost re-energised.

The above notifications should align to the Black Start transition diagram which is included in Appendix 5 of this document. The diagram provides a schematic of the procedures that would need to be followed in the event of a Black Start.

In an FSC event, the FSC provisions supersede those of the BSC. This means that a BSC Party will not be in breach of the BSC if they have complied with the provisions of the FSC. The Issue 33 Group noted that if BSCCo was unaware of an FSC direction (due to the direction not being publicly declared) then a Party could be placed into Credit Default, as a result of taking action in response to the FSC direction.

To prevent this National Grid must advise BSCCo of any FSC direction it receives, which will enable BSCCo to ensure that Parties are not at risk of being placed in Credit Default as a direct result of responding to an FSC direction (a Party could still fall into credit default as a result of other actions taken which were not specifically in response to an FSC direction). P231 also states that BSCCo should use all available channels to

communicate non confidential FSC directions, including the use of the Balancing Mechanism Reporting System (BMRS).

It is proposed that a statement be included in the BSC to explicitly state that a BSC Party will not be in breach of the BSC as a direct result of complying with an FSC direction.

2.2 Return of normal market operations

For a Black Start event, the BSC currently states that the Panel determines the Settlement Period where normal operations apply following a Black Start. However, several events which are not listed in the BSC need to occur beforehand to ensure a prompt and orderly return to normal operations. These events are:

- ECVAA to send reports (the details of which will be determined by the Modification Group) to industry prior to normal market operations, informing Parties of their market positions. It should be noted that Volume Notifications prior to normal market resumption should be considered as null;
- By ten hours prior to the indicated return to normal operations Parties should submit BM Unit data to National Grid. This would provide National Grid greater visibility of the state of the electricity grid and Parties physical positions at the point of normal market operations; and
- National Grid inform the Panel, BSCCo and BSC Parties by one hour before normal market operations are due to commence whether it believes it can re-start normal operations.

This list is not exhaustive and the Modification Group should consider whether there are any additional events for inclusion in the Code.

3 PROPOSED PROGRESSION

BSCCo recommends that P231 is submitted to a 3 month Assessment Procedure with assessment being conducted by the Settlement Standing Modification Group (SSMG).

3.1 Terms of Reference

The Group will need to:

- Consider the revised processes relating to:
 - Commencement and cessation of a Black Start/FSC event including the role of the BSC Panel;
 - BSCCo communication of Black Start/FSC events;
 - Issuing of information from ECVAA;
 - Submission of BMU data to National Grid by 10 hours before market re-start;
 - Transmission Company decision as to whether market operations can resume one hour prior to market re-start; and
 - Whether there are any other requirements to ensure a smooth return to normal market operations.
- Determine whether all the additional information introduced by P231 will be in the BSC or whether a (new) BSCP is required to detail certain procedures. ELEXON has drafted a legal requirements matrix of the anticipated changes (see Appendix 4).

- Whether further clarity is required for the communications processes. This will include notification of Black Start periods from the BSC Panel/BSCCo and National Grid to the wider industry;
- Describe the benefits of P231;
- Identify any impacts on ECVAAs and credit checking/ credit default processes;
- Identify any consequential impacts on the Grid Code; and
- Establish if it is necessary to define what information ELEXON will provide to enable a decision to be made regarding market stability and re-starting market operations.

It is not anticipated that there are any environmental impacts, therefore no assessment will be made. The Group should also be mindful of the conclusions arising from P232.

ELEXON has invited DECC to participate in the Modification process.

3.2 Proposed timetable

As the areas for consideration are well defined, BSCCo recommends a 3 month Assessment Procedure for P231. This time will be used to further consider and consult upon the areas raised in this IWA.

It is estimated that progression of P231 will require:

- 3 Modification Group meetings (2 of which will be used for finalising the procedures relevant to P231);
- 1 BSCCo impact assessment;
- 1 joint industry consultation and impact assessment by BSC Agents, BSCCo, Parties and Party Agents (which will run in parallel with the impact assessment for P232); and
- 1 request for Transmission Company analysis.

BSCCo recommends that the P231 Modification Group is formed from members of the Settlement and Governance Standing Modification Groups (and should be the same Group that considers P232)

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.

3.3 Estimated Costs and Impacts

Please refer to Appendices 2 and 3 of this document for an initial assessment of the impacts and an estimate of the cost of progressing P231, respectively.

4 RECOMMENDATIONS

BSCCo's recommendations are that the Panel:

- DETERMINE that Modification Proposal P231 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 at its meeting on 09 April 2009;

- DETERMINE that the P231 Modification Group should be formed from members of the SSMG and GSMG; and
- AGREE the Modification Group's Terms of Reference.

5 TERMS USED IN THIS DOCUMENT

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

Acronym/Term	Definition
BERR	Department for Business Enterprise and Regulatory Reform
BMRS	Balancing Mechanism Reporting System
DECC	Department for Energy and Climate Change
ECVAA	Energy Contract Volume Aggregation Agent
FSC	Fuel Security Code
GSMG	Governance Standing Modification Group
SSMG	Settlement Standing Modification Group

6 REFERENCES

Ref.	Document Title	Owner	Issue Date	Version
1	Issue 32 Black Start Report	ELEXON	10/07/08	1.0
2	Issue 33 Fuel Security Code (FSC) Guidance	ELEXON		

APPENDIX 1: MODIFICATION PROPOSAL

Modification Proposal – BSCP40/03	MP No: P231 <i>(mandatory by BSCCo)</i>
Title of Modification Proposal: Black Start and Fuel Security Code Procedures under the Balancing and Settlement Code (BSC)	
Submission Date: 23 December 2008	
Description of Proposed Modification:	
<p>The aim of this Modification Proposal is to improve transparency regarding the processes to be followed pursuant to a Black Start or Fuel Security Code (FSC) event. Section G of the Balancing and Settlement Code (BSC) provides high level details of the obligations for both a Black Start and FSC. However, there are certain areas that would benefit from further clarification.</p> <p>The overall goal for this Modification is to provide clarification regarding the obligations of the Panel, BSC Parties (including Transmission Company⁵) and BSCCo arising from a Black Start or Fuel Security event.</p> <p>Based on the investigations carried out by the Issue groups 32 and 33, a number of conclusions were drawn, one of which was to put in place a more detailed process for managing a Black Start or Fuel Security event. This Modification aims to address this by outlining::</p> <ol style="list-style-type: none"> 1. The commencement and cessation of a Black Start and Fuel Security period and the orderly transition process to normal market operation; and 2. The roles and responsibilities of relevant participants. <p>The above two points are explained in more detail below:</p> <p>1. Commencement and cessation of the Black Start and Fuel Security period</p> <p><i>With regards to a Black Start event</i>, paragraph G3.1.2 of the BSC currently states that the Panel shall determine the Settlement Period with effect from which the Total Shutdown or Partial Shutdown of the Transmission System commenced. In reality, the commencement will reflect the Transmission Company's declaration of a Black Start event and therefore there is no need for a Panel determination.</p> <p>It is therefore proposed that the BSC should reflect:</p> <ul style="list-style-type: none"> • The Transmission Company's declaration shall be taken as the commencement of a Black Start period. All parties to a Black Start will adopt this as the commencement time/date; • BSCCo will use reasonable endeavours to communicate the commencement and cessation of the event via any normal means (e.g. email, fax and telecommunications) as soon as those mechanisms become available; and • The above notifications should align to the transition diagram depicted within the Issue 32 report (Attachment A – Issue 32: Black Start Transition Diagram). <p><i>With regards to an FSC event</i>, Section G4 of the BSC sets out the relevant provisions. However, this section does not include information regarding general communication of FSC directions to BSC Parties.</p> <p>It is therefore proposed that the BSC should indicate:</p> <ul style="list-style-type: none"> • Fuel Security periods will be as instructed by the Secretary of State; • The Transmission Company shall ensure that all available communication channels are utilised in order to communicate both confidential and non-confidential FSC directions to BSCCo; This measure will enable BSCCo to reduce the risk of parties being subjected to credit default as a direct result of adhering to an FSC 	

⁵ In terms of this Modification Proposal the term 'Transmission Company' will refer to National Grid or System Operator.

Modification Proposal – BSCP40/03	MP No: P231 <i>(mandatory by BSCCo)</i>
<p>direction. and</p> <ul style="list-style-type: none"> BSCCo shall ensure that all available communication channels are utilised in order to communicate non confidential FSC directions to BSC Parties, including publication on the BMRS. <p>2. Appropriate arrangements, processes and timetables to successfully reinstate the market following a Black Start or Fuel Security event</p> <p><i>With regards to a Black Start event</i>, paragraph G3.1.2(c) states that the Panel shall determine the Settlement Period with effect from which normal operations shall apply following a Black Start event. The transition process outlined in the Issue 32 report (Attachment A – Issue 32: Black Start Transition Diagram) identifies the key events that occur during a Black Start and sets out activities that should be carried out to ensure an orderly return to normal operations. This includes (but is not limited to):</p> <ul style="list-style-type: none"> The requirement for ECVAA to send information regarding Volume Notifications prior to normal operations with a caveat that any non zero positions contained in the reports for periods prior to normal operations are incorrect and all positions should be assumed to be zero until normal operations commence; The requirement for Parties to use reasonable endeavours to submit BM unit data ten hours prior to normal operations; and The requirement for the Transmission Company to decide one hour ahead of ‘go live’ whether it is appropriate to go ahead one hour prior with normal operations. <p>It is proposed that these steps be included in the BSC (and any others as determined by the Modification Group in consideration of the attached issue 32 report).</p> <p><i>With regards to an FSC event</i>, Part 2 E2.08 of the FSC states that the FSC shall prevail in the event of any inconsistency between any provision of the FSC and the BSC. In addition section 12 of the FSC Guidance Notes states that complying with an FSC direction will not lead to a breach of the BSC. Therefore it is proposed that the BSC include a paragraph to state explicitly that processes and procedures occurring as a direct result of an FSC direction should not result in a party being found in breach of the BSC, and specifically in Credit Default under the provisions in Section M.</p>	
<p>Description of Issue or Defect that Modification Proposal Seeks to Address</p> <p>Section G of the BSC seeks to address various contingencies, and related provisions. In particular, paragraphs 3 and 4 focus on the issues of a Black Start and Fuel Security respectively. This modification seeks to improve the transparency of the BSC processes and procedures that would be associated with a Black Start or Fuel Security event.</p>	
<p>Impact on Code</p> <p>The proposed changes will have an impact on section G of the BSC.</p>	
<p>Impact on Core Industry Documents or System Operator-Transmission Owner Code</p> <p>Potential Impact on the Grid Code.</p>	
<p>Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties</p> <p>Potential impact on BSC Systems and Party Systems.</p>	
<p>Impact on other Configurable Items <i>(optional by originator)</i></p> <p>New BSCP to be created for the Claims process administration.</p>	

Modification Proposal – BSCP40/03	MP No: P231 <i>(mandatory by BSCCo)</i>
<p>Justification for Proposed Modification with Reference to Applicable BSC Objectives</p> <p>Clarifications/amendments to the Black Start and Fuel Security provisions would benefit the determination and financial settlement of obligations between parties and would bring about efficiencies in the administration and implementation of the BSC arrangements (objective (d)).</p> <p>The proposed changes are expected to have a positive impact on objective (b). Clarity regarding the Transmission Company's post-event obligations, will ensure that individual participants have a better understanding of Black Start and FSC procedures which should assist the Transmission Company to operate the Transmission System in an efficient manner.</p>	
<p>Urgency Recommended:</p> <p>No</p>	
<p>Justification for Urgency Recommendation</p> <p>N/A</p>	
<p>Details of Proposer:</p> <p>Name: <i>Shafqat Ali</i></p> <p>Organisation: <i>National Grid</i></p> <p>Telephone Number: <i>01926 655980</i></p> <p>Email Address: shafqat.r.ali@uk.ngrid.com</p>	
<p>Details of Proposer's Representative:</p> <p>Details of Proposer's Representative:</p> <p>Name: <i>Shafqat Ali</i></p> <p>Organisation: <i>National Grid</i></p> <p>Telephone Number: <i>01926 655980</i></p> <p>Email address: shafqat.r.ali@uk.ngrid.com</p>	
<p>Details of Representative's Alternate:</p> <p>Name: <i>Rob Smith</i></p> <p>Organisation: <i>National Grid.</i></p> <p>Telephone Number: <i>01926 654076</i></p> <p>Email address: robert.smith@uk.ngrid.com</p>	

Modification Proposal – BSCP40/03	MP No: P231 <i>(mandatory by BSCCo)</i>
Attachments: Yes	
Attachment 1 - Issue 32 Black Start Report Attachment 2 - Report on Issue 33 'Fuel Security Code (FSC) Guidance'	

Please note: The above attachments can be accessed via the hyperlinks present in Section 6 'References' and have not been included with this Initial Written Assessment.

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 P231.

a) Impact on BSC Systems and Processes

BSC System / Process	Potential Impact of Proposed Modification
ECVAA	ECVAA will be required to send reports (the details of which will be determined by the Modification Group) to industry prior to normal market operations, informing Parties of their market positions. It should be noted that Volume Notifications prior to normal market resumption should be considered as null.

b) Impact on BSC Agent Contractual Arrangements

BSC Agent Contract	Potential Impact of Proposed Modification
LogicaCMG (ECVAA)	The ECVAA Service Description, Manual System Specification and Operational Service Manual may require amendments to reflect the solution.

c) Impact on BSC Parties and Party Agents

BSC Parties will be required to familiarise themselves with the solution and assess any changes to their working processes. Volume Notification Agents will need to ensure their processes allow for the resubmission of contracts for affected periods.

d) Impact on Transmission Company

The Transmission Company will need to ensure the solution is consistent with its processes and obligations under the BSC and other Codes.

e) Impact on BSCCo

Area of Business	Potential Impact of Proposed Modification
Operational Support	Support the operational processes during a Black Start and/or FSC period. This will require the update to, and potential creation of, new Local Working Instructions.
Change Implementation	Update to the BSC and potentially the creation of a new BSCP.

f) Impact on Code

Code Section	Potential Impact of Proposed Modification
Section G	<p>The Code will need to be amended to include new obligations on:</p> <ul style="list-style-type: none"> • The BSC Panel; • BSC Parties; • BSC Agents; • Interconnector Administrators and users; • Transmission Company. <p>Amendments to explicitly state that a BSC Party complying with an FSC direction will not be in breach of the BSC.</p>

g) Impact on Code Subsidiary Documents

A new BSCP may need to be created to outline the procedures relating to the duration of a Black Start / FSC event, and the return to normal market operations.

h) Impact on Core Industry Documents and Other Documents

Document	Potential Impact of Proposed Modification
Grid Code	Operating Code 9 may require amendments to reflect the solution.

i) Impact on Other Configurable Items

None

j) Impact on BSCCo Memorandum and Articles of Association

None

k) Impact on Governance and Regulatory Framework

None

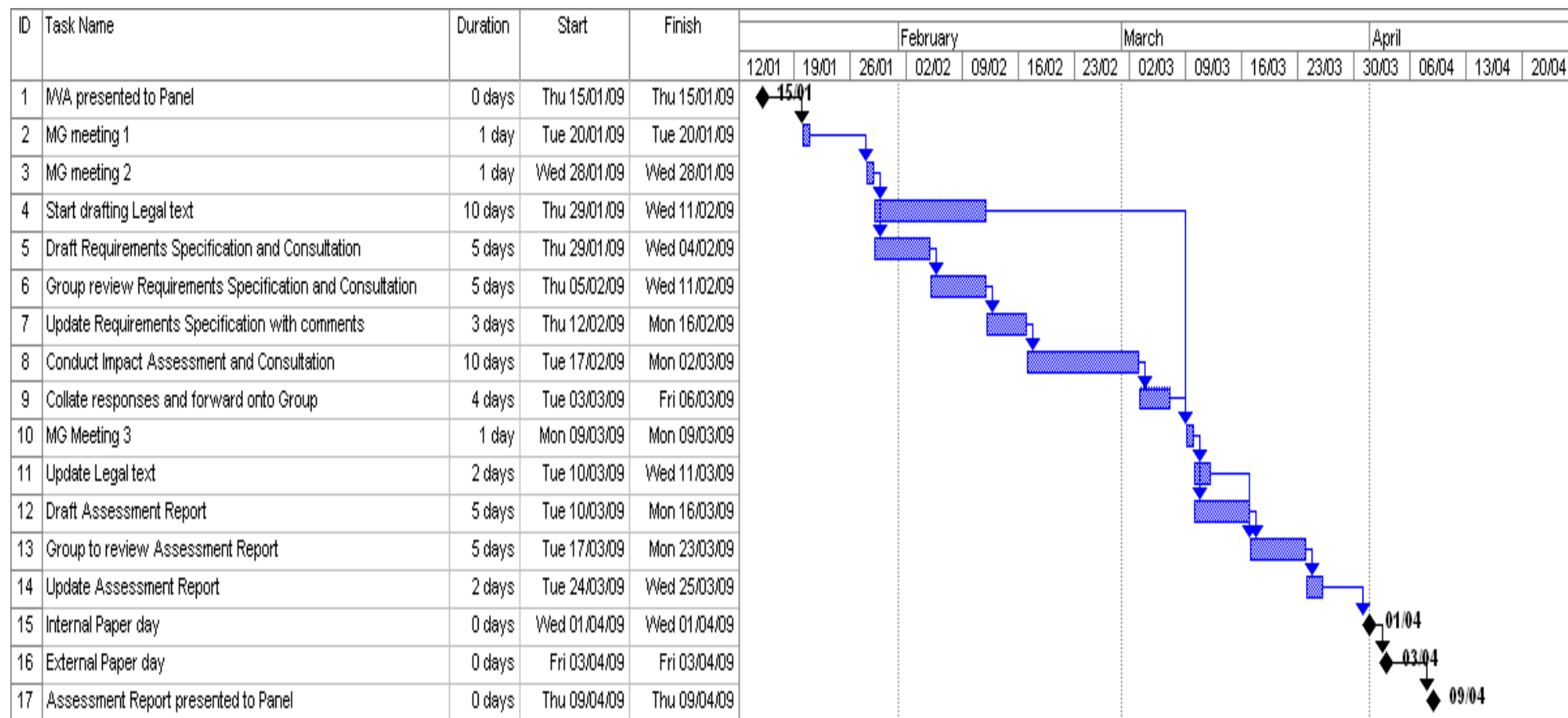
APPENDIX 3: COSTS AND TIMETABLE FOR PROGRESSION

ESTIMATED COSTS OF PROGRESSING MODIFICATION PROPOSAL

Meeting Cost	£ 1,500
Legal/Expert Cost	£ 0
Impact Assessment Cost	£ 5,000
ELEXON Resource	59 man days £ 17,705

⁶ 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

Initial Timetable for Progression of P231 (note that the dates of Modification Group meetings are indicative)



APPENDIX 4: LEGAL REQUIREMENTS MATRIX

1. Duration of a Black Start or Fuel Security period

Ref	Proposed Solution Requirement	Sections of the Code that are Likely to Require Amendment	Grid Code	BSCPs	FSC
1	Remove references to the Panel determining the Settlement Period with effect from which the Total Shutdown or Partial Shutdown of the Transmission System commenced. Insert text to ensure that it shall be the responsibility of the Transmission Company to make such determination.	Section G 3.1	OC9	None	None
2	Reference to BSCCo making reasonable endeavours to communicate the commencement and cessation of the event via any normal means (e.g. email, fax and telecommunications) as soon as those mechanisms become available.	Section G 3.1.2		None	None
3	Ensure that there is a clear statement that a Fuel Security Period begins when the Secretary of State gives such a direction under the Electricity Act 1989.	Section G 1.1 and G4 (these sections may not actually require amendment if it is felt that Fuel Security Period is sufficiently defined)		None	None

4	The insertion of an obligation on the Transmission Company to appropriately utilise all available communication channels to communicate details of Fuel Security directions (confidential and non-confidential) to BSCCo.	Section G 4		None	None
5	The insertion of an obligation on BSCCo to appropriately utilise all available communication channels to communicate details of non confidential Fuel Security directions to BSC Parties including publication on the BMRS	Section G 4		None	None

2. Return to normal market operation

Ref	Requirement	Impact on Code	Grid Code	BSCPs	FSC
6	The insertion of a requirement for ECVAA to send information regarding Volume Notifications prior to the end of the Black Start Period in preparation for normal operations.	Section G 3		Details regarding timescales and data flows may be contained in a new 'Contingencies' BSCP.	None
7	The insertion of a requirement for Parties to use reasonable endeavours to submit Physical Notifications ten hours prior to the end of the Black Start Period in preparation for normal operations; and	Section G 3		Details regarding timescales and data flows may be contained in a new 'Contingencies' BSCP.	None
8	The insertion of a requirement for the Transmission Company to decide whether it is appropriate to go ahead with normal market operations one hour prior to these operations coming into effect.	Section G 3		Details regarding timescales and data flows may be contained in a new 'Contingencies' BSCP.	None

9	The insertion of a paragraph ensuring it is clear that complying with the FSC will not cause a Party or Party Agent to be in breach of the BSC.	Section G 3		None	None

APPENDIX 5: BLACK START TRANSITION DIAGRAM

Black Start Transition Diagram

