P309 'Facility to enable BSC Parties to select either replacement contract notifications or additional contract notifications'

ELEXON

What stage is this document in the process?

- 01 Initial Written Assessment
- 02 Definition Procedure
- 03 Assessment Procedure
- 04 Report Phase

This Modification proposes to give BSC Parties the ability to specify that either replacement contract notifications or additional contract notifications are associated with an Energy Contract Volume Notification Agent Authorisation. The aim is to mitigate the risk that replacement notifications might be submitted instead of additional notifications, or vice versa.

The Proposed Modification includes a limited ability to apply this choice retrospectively; the Workgroup's Alternative removes this retrospective element but is otherwise identical.

This Report Phase Consultation for P309 closes:

5pm on **3 February 2015**

The Panel may not be able to consider late responses.

The BSC Panel initially recommends **approval** of the P309 Alternative Modification and **rejection** of the P309 Proposed Modification

This Modification is expected to impact:

- BSC Parties
- Energy Contract Volume Notification Agents (ECVNAs)

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About This Document

This is the P309 Draft Modification Report, which ELEXON is issuing for industry consultation on the BSC Panel's behalf. It contains the Panel's provisional recommendations on P309. The Panel will consider all consultation responses at its meeting on 12 February 2015, when it will agree a final recommendation to the Authority on whether or not the change should be made.

There are six parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits/drawbacks and proposed implementation approach. It also summarises the Workgroup's key views on the areas set by the Panel in its Terms of Reference, and contains details of the Workgroup's membership and full Terms of Reference.
- Attachment A contains the proposed redlined changes to the BSC for P309 Proposed solution.
- Attachment B contains the proposed redlined changes to the BSC for P309 Alternative solution.
- Attachment C contains examples of how the ECVAA system processes notifications in various scenarios under the baseline and P309.
- Attachment D contains the full responses received to the Workgroup's Assessment Procedure Consultation.
- Attachment E contains the specific questions on which the Panel seeks your views. Please use this form to provide your responses to these questions, and to record any further views/comments you wish the Panel to consider.

Any questions?

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1 Summary

Why Change?

BSC Section P 'Energy Contract Volumes and Metered Volume Reallocations' sets out the current requirements for BSC Parties to notify the BSC systems of their contract positions to enable Energy Imbalance Volumes to be calculated.

It is suggested that the current BSC and associated systems enable a BSC Party to unintentionally switch between replacement contract notifications (overwrite) and additional contract notifications (additive) or vice versa. This creates a risk for Parties with the Energy Contract submission process that could affect competition in the Great Britain (GB) electricity market, and should therefore be amended.

Proposed solution

Under the P309 Proposed Modification, a BSC Party must select the type of contract notifications associated with an ECVNA Authorisation; either additional only, replacement only, or both additional and replacement. Existing Authorisations would automatically default to 'both' so Parties with existing notifications would not be affected until they set up a new Authorisation (or change an existing Authorisation), and can then choose 'both' if they wish.

The Proposed Modification includes a retrospective element that would enable Parties, for a period of five Working Days following the Implementation Date, to retrospectively apply notification type selections to historic Authorisations, on or after an Effective Date of **21 May 2013**.

Alternative solution

The P309 Alternative Modification is the same as the Proposed Modification except that it has no retrospective element.

Under the P309 Alternative Modification, a BSC Party must select the type of contract notifications associated with an ECVNA Authorisation; either additional only, replacement only, or both additional and replacement. Existing Authorisations would automatically default to 'both' so Parties with existing notifications would not be affected until they set up a new Authorisation (or change an existing Authorisation), and can then choose 'both' if they wish.

Impacts & Costs

P309 will impact all **BSC Parties** and **ECVNAs.**

The central implementation cost of the P309 Proposed Modification is approximately £75.5k.

The central implementation cost of the P309 Alternative Modification is approximately £71k.

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Implementation

The recommended Implementation Date of both the P309 Proposed Modification and Alternative Modification is:

- **5 November 2015** as part of the November 2015 BSC Systems Release if an Authority decision is received on or before 3 July 2015; or
- **25 February 2016** as part of the February 2016 BSC Systems Release if an Authority decision is received after 3 July 2015 but on or before 22 October 2015.

The implementation of the Proposed Modification would include a five Working Day period following implementation in which Parties could initiate retrospective amendments.

Recommendation

The Panel unanimously believes that the P309 Alternative solution would better facilitate Applicable BSC Objectives (c) and (d) and therefore its initial unanimous recommendation is that the P309 Alternative solution should be **approved**.

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2 Why Change?

Background

Section P 'Energy Contract Volumes and Metered Volume Reallocations' of the BSC requires BSC Parties to notify the BSC systems of their contract positions to enable Energy Imbalance Volumes to be calculated.

What is an Energy Contract Volume Notification?

Energy Contract Volume Notification Agents (ECVNAs) submit notifications known as Energy Contract Volume Notifications (ECVNs) on behalf of BSC Parties. Notifications can be submitted as follows:

- **Via direct file transfer protocol (FTP) transfers to the Energy Contract Volume Aggregation Agent (ECVAA)**: The ECVAA receives, validates, approves and records notifications in relation to the relevant Party's production and/or consumption energy accounts, prior to Gate Closure. ECVNs notify the ECVAA of the volumes of energy bought and sold between two Energy Accounts. These Energy Accounts could belong to separate Parties or could both belong to the same Party.
- **By use of a web-based reporting and submission tool known as the ECVAA Web Service**: The ECVAA Web Service is an easy to use and secure web interface which is available to all BSC Parties.

ECVNs can only be made in the form specified as there is no scope for Parties to specify any additional qualification or condition in the notification.

What is an ECVNA Authorisation?

An ECVNA Authorisation ('Authorisation') by a Party authorises an agent to act as an ECVNA on behalf of that Party. Submission of ECVNA Authorisations must be made in accordance with BSCP71 'Submission of ECVNs and MVRNs' and must specify:

- the relevant ECVNA;
- the Contract Trading Parties
- the Energy (To) Account;
- the Energy (From) Account: and
- the day on which the Authorisation takes effect from (no earlier than 00:01 hours on the day after the Authorisation request being processed by ECVAA).

For an Authorisation to be valid, all Parties and Notification Agents involved in an Authorisation need to submit matching Authorisation applications.

Additional and replacement contract notifications

Once an ECVN has been submitted to the ECVAA it cannot be withdrawn. Amendments can therefore only be made by further notifications being submitted as either:

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- additional notifications ('additive') where the initial notification will remain and a new ECVN will add to any previously submitted ECVNs for the same combination of BSC Party Energy Accounts for the dates specified; or
- replacement notifications ('overwrite') where the initial notification will be overwritten in its entirety from the Applied From Date and earliest Settlement Period for which Gate Closure has not passed.

An Authorisation can be terminated at any point. However, the termination does not automatically remove any notifications previously submitted using the Authorisation, it only prevents the submission of further notifications using this Authorisation.

What is the issue?

The Proposer of P309 contends that the current BSC provisions and associated systems allow BSC Parties to unintentionally submit replacement (overwrite) energy contract notifications instead of additional (additive) energy contract notifications (or vice versa). The Proposer notes that this issue was identified due to an inadvertent error in contract submissions after a software upgrade by a BSC party.

The Proposer believes that this situation creates a risk for Parties in relation to the energy contract submission process that could affect competition in the GB electricity market. The Proposer therefore argues that this Modification will address this issue by enabling Parties to prevent an unintentional submission of replacement contract notifications (overwrite) instead of additional contract notifications (additive), or vice versa.

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3 Solution

Proposed solution

P309 seeks to amend the current provisions in BSC Section P to enable BSC Parties to select either additional contract notifications or replacement contract notifications (as the case may be) as part of any ECVNA Authorisation.

Under P309, a Party may submit an ECVNA Authorisation that specifies that either:

- **Replacement notifications** are selected for that authorisation:
  In this case additional notifications ('additive') will be disregarded in Settlement for the Party; or

- **Additional notifications** are selected for that authorisation:
  In this case replacement notifications ('overwrite') will be disregarded in Settlement for the Party; or

- **Both additional notifications and replacement notifications** are selected for that authorisation:
  In this case both additional notifications ('additive') and replacement notifications ('overwrite') can be used in Settlement for the Party.

For the avoidance of doubt, if a Party chooses to continue to use both additional and replacement notifications for that authorisation, this will effectively be the same as the current arrangements. Both additional and replacement notifications will be selected and can be used in Settlement for the Party.

In addition, BSC Parties will be required to complete an 'Effective From Date' field in order to specify the date from which the amended notifications are selected. For the avoidance of doubt, if the amendment notification type does not match that selected for a particular ECVNA Authorisation (and the Effective From Date not being completed or not being valid for Authorisation amendments), it will be rejected.

The P309 arrangements would apply from the proposed P309 Implementation Date of 5 November 2015, and with effect in specific circumstances from an Effective Date of not before 21 May 2013 which is the Settlement Day that had its RF Run on 10 July 2014, i.e. retrospectively. The justification for this date is that 10 July 2014 was when the Modification was presented to the BSC Panel. The retrospective element will be achieved by manual changes to the data although we anticipate that the number of impacted authorisations and notifications will be low.

BSC Legal text for proposed solution

The proposed changes to the BSC to deliver the P309 Proposed solution include new definitions of types of notifications to remove any uncertainty for Parties. These are as follows:

Replacement Energy Contract Volume Notification

The definition of a Replacement Energy Contract Volume Notification is based on the wording of the Section P2.3.5(a) of the current BSC which specifies that a notification shall replace an earlier notification if:

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a) the relevant Energy Contract Volume Notification Agent, Energy (From) Account and Energy (To) account are the same as those for the earlier submitted Energy Contract Volume Notification;

b) the notification specifies that it is to replace the earlier notification by the ECVN identifier; and

c) the Effective-from Date of the notification is the same as or prior to the Effective-to Date of the earlier notification.

The inclusion of a defined term has separated out the circumstances in which a notification will replace an earlier notification from the effect of a notification replacing an earlier notification.

Additional Energy Contract Volume Notification

Under the current BSC (Section P2.3.5(b)) any Energy Contract Volume Notification that is submitted and does not have the effect of replacing an earlier submitted notification will be considered to be additional to the earlier notification. The new definition of an Additional Energy Contract Volume Notification is:

a) the relevant Energy Contract Volume Notification Agent, Energy (From) Account and Energy (To) account are the same as those for an earlier submitted Energy Contract Volume Notification;

b) the notification does not specify that it is to replace the earlier notification by the ECVN identifier; and

c) the period for which the second notification shall be effective includes one or more Settlement Periods that are within the period for which the earlier notification is effective (i.e. there is an overlap between the effective period of the earlier notification with the new notification).

The inclusion of a defined term has separated out the circumstances in which a notification will be additional to an earlier notification from the effect of such notification being additional. A positive definition of an Additional Energy Contract Volume Notification reflects the practical effect of a subsequent notification adding to an earlier notification.

Initial Energy Contract Volume Notification

The current BSC drafting does not include the concept of an Initial Energy Contract Volume Notification. However a new definition has been created to clarify the position of the first notification and includes some notifications that would have previously been considered to be additional (in particular, where the ECVN identifiers are different and there is no overlap in Settlement Periods).

The new definition of an Initial Energy Contract Volume Notification is as follows:

a) an Energy Contract Volume Notification in respect of which there is no earlier submitted Energy Contract Volume Notification with the same Energy Contract Volume Notification Agent, Energy (From) Account and Energy (To) Account (this would cover the first ever submitted ECVN); or

b) the relevant Energy Contract Volume Notification Agent, Energy (From) Account and Energy (To) account are the same as those for an earlier submitted Energy

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Contract Volume Notification and the Energy Contract Volume Notification is not a Replacement Energy Contract Volume Notification or an Additional Energy Contract Volume Notification.

An Initial Energy Contract Volume notification can be submitted regardless of whether an Energy Contract Volume Notification Agent is authorised to submit only Additional Energy Contract Volume Notifications, only Replacement Energy Contract Volume Notifications or either Additional Energy Contract Volume Notifications (i.e. it is not affected by the mode of operation).

The proposed redlined changes to the BSC can be found in Attachment A. Further details of the Workgroup's discussions on the draft legal text are set out in section 7. Please note that the draft legal text for the Proposed solution is identical to the draft legal text for the Alternative solution, except for the provisions relating to the Proposed solution's retrospective element.

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4 Alternative solution

The P309 Workgroup developed an alternative solution which is identical to the proposed solution in respect of selecting one of the three amendment notification types with a particular ECVNA Authorisation, the completion of a new 'Effective From Date' field to specify the date from which the amended notifications are selected and the introduction of an 'initial' notification type.

However, the Workgroup agreed that under the Alternative solution the new arrangements would only apply from the proposed P309 Implementation Date of 5 November 2015, i.e. prospectively only.

The Workgroup's discussions in developing the alternative solution are set out in section 7.

BSC Legal text for alternative solution

The proposed redlined changes to the BSC to deliver the P309 Alternative solution can be found in Attachment B. Further details of the Workgroup's discussions on the proposed legal text are set out in section 7.

Please note that the draft legal text for the Alternative solution is identical to the draft legal text for the Proposed solution, except that it does not contain any of the provisions relating to the retrospective aspect of the Proposed solution.

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5 Impacts & Costs

Estimated central implementation costs of P309

Proposed solution

The total central implementation costs for the P309 Proposed solution is approximately **£75.5k**. This comprises of:

- Approximately £61.5k in system change costs to the ECVAA; and
- Approximately £14k in ELEXON effort for managing the implementation.

Potential alternative solution

The total central implementation costs for the P309 Alternative solution is approximately **£71k**. This comprises of:

- Approximately £58.5k in system change costs to the ECVAA; and
- Approximately £12.5k in ELEXON effort for managing the implementation.

P309 impacts

Impact on BSC Parties and Party Agents	
Party/Party Agent	Impact
BSC Parties	It is anticipated that there will not be a direct impact on BSC Parties to implement this Modification. Under the proposed and alternative solutions, BSC Parties will have to select a notification type on any new Authorisations they set up. However, if they choose to select 'both' (additional and replacement notifications), they will avoid being impacted as this will be the same as the current arrangements.
ECVNAs	Under the proposed and alternative solutions, there will be a direct impact on ECVNAs because of changes to the ECVAA system.

Impact on Transmission Company
None anticipated.

Impact on BSCCo	
Area of ELEXON	Impact
Reporting	Under the proposed and alternative solutions, BSCCo will need to manage any changes to the current Authorisation process.
Change Implementation	Under the proposed and alternative solutions, BSCCo will implement document and system changes.

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Impact on BSC Systems and process	
BSC System/Process	Impact
ECVAA	Both the proposed and alternative solutions will introduce system changes for ECVNs.

Impact on Code	
Code Section	Impact
Section P	Under the proposed and alternative solutions, changes are required to implement the solution.
Section X-1	Under the proposed and alternative solutions, changes are required to implement the solution.

Impact on Code Subsidiary Documents	
CSD	Impact
BSCP71	Under the proposed and alternative solutions, changes are required to implement the solution.
NETA Interface Definition and Design (IDD) Part 1	Under the proposed and alternative solutions, changes are required to implement the solution.

Impact on other Configurable Items	
Configurable Item	Impact
ECVAA Service Description (SD)	Under the proposed and alternative solutions, changes are required to implement the solution.
ECVAA User Requirements Specification (URS)	Under the proposed and alternative solutions, changes are required to implement the solution.

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6 Implementation

Recommended Implementation Date

The Workgroup recommends an Implementation Date for both the P309 Proposed and Alternative solutions of:

- **5 November 2015** as part of the November 2015 BSC Systems Release if an Authority decision is received on or before 3 July 2015; or
- **25 February 2016** as part of the February 2016 BSC Systems Release if an Authority decision is received after 3 July 2015 but on or before 22 October 2015.

Implementation approach for retrospective aspect of Proposed solution

Although the new arrangements would apply from the proposed P309 Implementation Date of 5 November 2015 for the proposed solution, they would also apply with effect in specific circumstances from an Effective Date of **not before 21 May 2013** (which is the Settlement Day that had its RF Run on 10 July 2014, the date the Modification was presented to the BSC Panel), i.e. retrospectively.

From the Implementation Date of P309, Parties will have five Working Days in which they will be able to submit Authorisation amendments to apply to historical Authorisations. This will be a one-off opportunity to enable Parties to make retrospective amendments to authorisations to cause historic notifications to be retrospectively accepted or rejected. However, following the closure of this window, only the prospective arrangements will be available.

Further details of the Workgroup's discussions on the recommended Implementation Date are outlined in section 7.

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7 Workgroup's Discussions

The following section provides details on the P309 Workgroup discussions that led to the proposed and alternative solutions. The P309 Assessment Procedure included a two-month extension to enable the Workgroup to further consider and develop P309 after its initial analysis of ECVAA system processing of notifications under P309 raised some concerns.

The Proposed and Alternative Modification solutions are the finalised solutions and the Workgroup's further discussions are documented in this section. The further discussions took place after the P309 Assessment Procedure industry consultation, but the Workgroup did not consider it necessary to consult again because the amendments to the solution merely aligned it with how the Workgroup had believed it would operate originally.

For information:

Previous Ofgem decisions on Modifications that had a retrospective element:
P19 – Rejected August 2001
P37 – Accepted May 2002

Retrospection

The Workgroup discussed the retrospective element of the P309 proposed solution by considering Ofgem's guidance on retrospection and how it applies to this Modification. Under P210 'Revisions to the Text in Section P related to Single Notifications of Energy Contract Volumes and Metered Volume Reallocations', Ofgem advised that the following particular circumstances could give rise to the need for a retrospective rule change (in any event the loss sustained, or consequences of the problem, would need to be material):

- a situation where the fault or error occasioning the loss was directly attributable to central arrangements;
- combinations of circumstances that could not have been reasonably foreseen; or
- where the possibility of a retrospective action had been clearly flagged to the participants in advance, allowing the detail and process of the change to be finalised with retrospective effect.

It should be noted that the above criteria are considered guidance, and not definitive or binding.

Whilst the Workgroup did not support retrospection for P309, they noted the Proposer's argument that P309 would qualify under the circumstance of *'where the possibility of a retrospective action had been clearly flagged to the participants in advance, allowing the detail and process of the change to be finalised with retrospective effect'*, because the retrospection was tied to the date P309 was first presented to the BSC Panel, 10 July 2014. The Proposer contends that this constitutes the possibility of retrospective action being flagged in advance. Under the P309 proposed solution, Parties will be able to make amendments with effect in specific circumstances from an Effective Date of not before 21 May 2013 (which is the Settlement Day that had its RF Run on 10 July 2014).

The Workgroup agreed that P309 would constitute a material loss for the Party affected by the inadvertent error as it was indicated that there was a materiality of £2million, and that the effect of this also filters through to the counter Parties affected. Members of the Workgroup also commented that P309 was 'indirectly' rather than directly attributable to central arrangements due to ambiguity in the BSC.

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Implementation Date

Workgroup's consideration of the Implementation Date

The Workgroup unanimously agreed that the proposed changes should only apply from the P309 Implementation Date i.e. prospectively, which lead to its development of the P309 Alternative solution.

However, in relation to the P309 Proposed solution, the Proposer believed that the arrangements could apply to all contract notifications for Settlement periods where Gate Closure had already occurred at the Effective Date but where the RF Run had not yet been completed. They suggested that the earliest Effective Date that BSC Parties could submit would be the date that the Modification was submitted for consideration by the BSC Panel. The Proposer therefore noted that the P309 proposed solution would also apply with effect in specific circumstances from an Effective Date of not before 21 May 2013 (which is the Settlement Day that had its RF Run on 10 July 2014, the date the Modification was presented to the BSC Panel), i.e. retrospectively.

If the Authority approves the P309 proposed solution, the Workgroup agreed that ELEXON should send a circular to inform industry that P309 had been approved and to inform them that they should prepare if they wished to make use of the limited retrospective ability to amend Authorisations retrospectively.

From the Implementation Date of P309 Parties would have five Working Days in which they will be able to submit Authorisation amendments to apply to historical Authorisations. This will be a one-off opportunity to enable Parties to make these amendments, and following the closure of this window only the prospective arrangements will be available. The Workgroup considered that under P309 Proposed solution, industry participants should be notified soon after approval is received in order that Parties that wish to take up the opportunity to make retrospective changes can prepare. These Parties will therefore know which Authorisation amendments they wish to submit within the 5WD window. The Workgroup overall agreed that this approach would be the fairest and most straightforward and enabling Parties to prepare beforehand minimises the length of the retrospective amendment window required.

The Proposer and Workgroup developed the Proposed solution and its implementation approach based on the expectation that usage of the retrospective facility would be relatively low. The Workgroup therefore agreed to include a question in the consultation to determine to what extent Parties would envisage making use of the retrospective facility, if P309 Proposed is approved.

Taking into account the four month lead time required to implement the changes, the Workgroup therefore initially recommended an Implementation Date for both the P309 Proposed and Alternative solutions of:

- **25 June 2015** as part of the June 2015 BSC Systems Release if an Authority decision is received on or before 30 January 2015; or
- **5 November 2015** as part of the November 2015 BSC Systems Release if an Authority decision is received after 30 January 2015 but on or before 3 July 2015.

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Assessment Consultation respondents' views of the proposed Implementation Date

Respondents to the P309 Assessment Consultation unanimously agreed with the Workgroup's proposed Implementation Date for P309 proposed and alternative solutions.

The majority of respondents (all but one who was also the Proposer of the Modification) indicated that they would not utilise the retrospective element of the proposed solution.

Four respondents indicated that they would be impacted by the P309 proposed and alternative solutions (i.e. the non-retrospective elements), although this would only involve minor changes to processes for new and existing notifications and to internal processes.

Changes to Implementation Date

Following a two-month extension to the P309 Assessment period as granted by the BSC Panel at its meeting on 13 November 2014, the Workgroup noted that this change in the progression timetable would affect the proposed Implementation Dates for both the P309 Proposed and Alternative solutions. Submission of P309 to the Authority for decision after the Panel's consideration of the draft Modification Report on 12 February 2015 would not leave enough time for implementation in the June 2015 Release. The Workgroup therefore recommended new Implementation Dates of:

- **5 November 2015** as part of the November 2015 BSC Systems Release if an Authority decision is received on or before 3 July 2015; or
- **25 February 2016** as part of the February 2016 BSC Systems Release if an Authority decision is received after 3 July 2015 but on or before 22 October 2015.

Extra-Settlement Determinations

The Party that is driving P309, because it was affected by an inadvertent error, is the only Party that has indicated that if P309 Proposed Modification is approved it would intend to utilise the retrospective facility to change historic Authorisations (subject to discussion with ELEXON of the detailed effect of making such changes). The Workgroup considered that if P309 Proposed solution was to be approved in time for implementation as part of the June 2015 Release then this Party would be able to make amendments such that the effect of the changes would be captured by normal Settlement (by the RF run at the latest).

The Workgroup had initially emphasised that if an Authority decision is not made in time for P309 to be implemented as part of the June 2015 Release, there would be an impact in order to capture the effect of retrospective changes where the effects would not be picked up in normal settlement. If a Party chooses to make use of the service to amend historical Authorisations, there may be circumstances where Authorisations have already passed RF and would therefore have become crystallised in Settlement. Though this could occur with implementation in the June 2015 Release (i.e. if a Party unexpectedly uses the retrospective facility for an Authorisation that impacts a sufficiently early date), it would almost certainly occur under November 2015 implementation because the affected Party would need to amend Authorisations relating to dates that would not be captured by normal Settlement. The Workgroup had considered that this could potentially affect a large number of Parties because of residual cash flow if a decision is not made in time for a June 2015 Implementation Date.

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The Workgroup had therefore noted that those Authorisations which would have passed RF would require either a Post-Final Settlement (DF) Run or Extra-Settlement Determination (ESD) would need to be run. An ESD could be carried out straight away by ELEXON in comparison to a DF run which would not be carried out until 28 months after the relevant date. The Workgroup also noted that an advantage of an ESD is that it can pick up different dates in one run. Therefore if a number of Parties choose to make use of this available service and have a number of Authorisations that have passed RF, then they can be picked up altogether in one ESD.

BSC Section U 'Provisions relating to Settlement' 2.2 states that the Trading Disputes Committee (TDC) may determine an ESD to be performed. The Workgroup agreed that it would be appropriate for an ESD to be carried out for this specific circumstance. As detailed in BSC Section W 'Trading Disputes' 4.2.1, if the TDC determines that a DF Run or ESD should be performed, the TDC will need to make a recommendation to the Panel. The Proposer noted that ideally, the error would not be construed as a 'Trading Dispute' and could be self-contained in the Modification.

The Workgroup noted that if an ESD is required there would be a cost associated with running it, and this should be taken into account. This additional cost has increased significance now that the proposed Implementation Dates have been amended, as the Authorisations in question would have passed RF regardless of whether P309 (if approved) is implemented in either the November 2015 or February 2016 Release.

Testing

Although the Workgroup unanimously agreed with the proposed Implementation Date for P309, they highlighted that as part of the implementation of the Modification (if approved), adequate time for testing would be of vital importance. They suggested that a user group is formed of the P309 Proposer and a couple of other participants, who would test a pseudo-live system in advance of the Implementation Date. The purpose of this testing would be to allow participants to check for any unintended consequences or risks and subsequently ensure that there is sufficient time to respond to any that may arise, in time for the proposed Implementation Date. The Workgroup noted that this user-testing would reassure the Proposer and others that the position that would be established by implementing the Modification would be as expected.

Metered Volume Reallocation Notifications

Metered Volume Reallocation Notifications (MVRNs) notify the ECVAA that the energy flowing to or from a particular BM Unit is to be allocated to one or more different Party's Energy Accounts for the purposes of Energy Imbalance calculations. Similarly to ECVNs, MVRNs are submitted in accordance with BSCP71.

A member of the Workgroup queried whether MVRNs had been considered in the scope of P309. ELEXON advised that Parties have to elect to carry out an MVRN and that they are fixed by definition so there is less of a risk when these are submitted. The Proposer noted that the inadvertent error in discussion was a particular issue to do with ECVNs and therefore MVRNs were not included in the scope of P309. The Workgroup noted that if a workable solution was found for ECVNs, then a Party could raise a Modification to make the same changes in relation to MRVNs.

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Assessment Consultation respondents' additional comments

One respondent commented that obligations under Grid Trade Master Agreements (GTMAs) with other Parties may include an ECVNA Authorisation. For example, a condition of a GTMA between two Parties may be one that is the default 'Notifier' of any trades between the two, but that the counter-party must have the back-up ability to make nominations. Any Party considering changing their Authorisations must therefore ensure that they could still fulfil a fall back notifying agent role under all their GTMAs.

The Workgroup considered the respondent's concern but agreed that under GTMA, a counter-party may have the back-up ability to make nominations but noted that they do not have to elect for this. Members commented that for protection purposes, an ECVNA still needs to get agreement from both Parties before submitting the flag, and therefore highlighted that it should not be carried out unilaterally.

Changes to BSC and CSDs

The Workgroup agreed that the ECVN process as set out in BSC Section P is currently unclear. They therefore suggested that rather than making minimal changes to the text, as much clarity as possible should be included to make the intention of the process clear. The Workgroup advised that the ECVN process should be made as explicit as possible so Parties, particularly new entrants understand the full process clearly so the risk of inadvertent errors occurring again in the future are minimal.

As part of providing additional clarity, the Workgroup recommended that definitions of "replacement notifications" and "additional notifications" should be included in BSC Section X-1. The clarification changes have been included in the draft legal text for both the Proposed and Alternative solutions. These can be found in Attachments A and B respectively.

"First" notifications

As part of its discussions to provide further clarification to the definitions of replacement and additional notifications, the Workgroup identified a potential issue in relation to BSC Section P2.3.5 of how the "first" notification is treated. The Workgroup discussed the situation where a new Authorisation type is selected to 'replacement' and queried what would happen to the "first" notification if in effect, nothing is being replaced. They were concerned that if there is no unique ID number then the notification would be rejected.

The Workgroup confirmed with the Service Provider that the system will not reject the first notification associated with an Authorisation if 'replacement' is selected as the mode of operation for that ECVNA. The Workgroup agreed that this clarification should also be reflected in the legal text for the Proposed and Alternative solutions to confirm that the first time the replacement notification is received, it will always be accepted (unless it meets criteria to be rejected for a reason not related to the notification type).

The legal text therefore includes a definition of "Initial Energy Contract Volume Notification" in Annex X-1. 'Initial' is used instead of 'First' to avoid potential confusion with the use of 'first' and 'second' in the definitions of "Additional Energy Contract Volume Notification" and "Replacement Energy Contract Volume Notification".

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Assessment Consultation respondents' views of the draft legal text

The majority of respondents to the Assessment Consultation agreed with the proposed legal text for the P309 proposed and alternative solutions. However, one respondent provided a number of comments on the draft legal text (detailed as an Appendix in Attachment C), which the Workgroup took into consideration as part of its discussions.

The respondent commented that 'valid' and 'submitted' in BSC Section P2.3.5 were the wrong way round. The Workgroup considered the comments, the baseline processes and BSC text and the prospective P309 processes and BSC text; ultimately the Workgroup disagreed and highlighted that the validity of an Authorisation is in accordance with P2.1.3. However, to avoid confusion, the Workgroup agreed to include a third definition of a notification to reflect where there is no earlier submitted notification (either additional or replacement) in the system. It agreed that this definition should also be included in BSC Section X-1 similarly to the definitions of "replacement notifications" and "additional notifications" which had already been included in the drafting to provide additional clarity. Section P2.3.5 would therefore only apply to a valid replacement ECVN or additional ECVN.

Initially, the Workgroup intended to call this third definition a 'First Energy Contract Volume Notification' but believed that 'First' could cause confusion with 'the "first" such notification' in Section P2.3.5. Consequently, the term 'Initial Energy Contract Volume Notification' has been used instead to prevent any ambiguity over which 'first' is being referred to.

Following the responses received to the P309 Assessment Procedure Consultation and further Workgroup discussions, the draft legal text has been updated to reflect the agreed changes. These can be found in Attachments A and B.

Further assessment

Notification processing under the baseline and P309

Following its discussion of the consultation responses received and consideration of the existing notification processes, current BSC legal text and the prospective P309 notification processes, the Workgroup sought confirmation of how the BSC systems would process notifications in specific circumstances. The Workgroup wished to determine how the systems would process notifications (under the baseline and under P309), including normal notification scenarios and also in some relatively unusual situations, to confirm that this was in line with its understanding of the BSC provisions (both baseline and under P309).

The objective of this analysis was to make explicit the effect of the legal text under the P309 solutions, in particular so that the Workgroup could confirm that:

- the effect of the P309 'dual mode' is the same as that of the current baseline; and
- the outcomes under the P309 'overwrite only' and 'additive only' modes align with the Workgroup's expectations of how these modes should function.

Attachment C contains a number of scenarios of submitted notifications, showing how the ECVAA system would process the notifications to determine the net effect. The scenarios were devised based on notifications with both effective from and effective to dates (scenarios 1-14) and then amended to reflect that in reality, participants often operate using notifications without effective to dates (i.e. effective 'in perpetuity' - denoted as

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scenarios 1P-13P). For each example, rows were completed to show the net effect under the:

- current arrangements i.e. baseline (if IDs are the same and the 'from' date of the later submitted notification is before the 'to' date of the earlier notification, it is an overwrite (replacement) notification; otherwise it is an additive (additional) notification);
- P309 'dual mode' - both overwrite (replacement) and additive (additional) notifications are accepted;
- P309 solution with authorisation set to 'overwrite only' (replacement); and
- P309 solution with authorisation set to 'additive only' (additional).

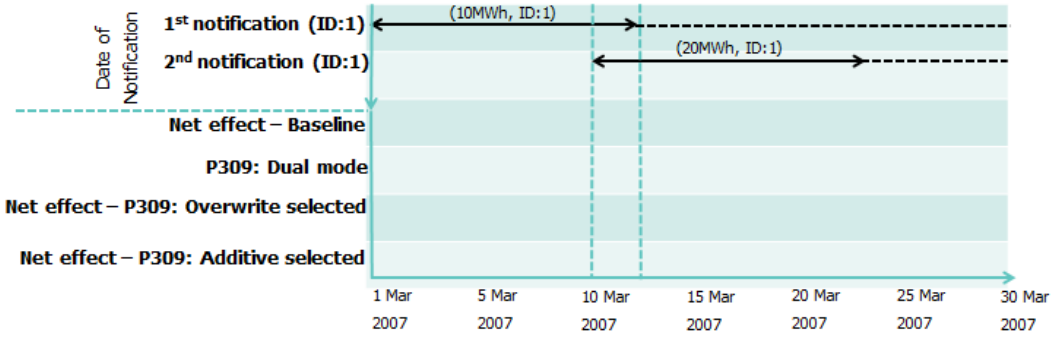
Under all the P309 modes of operation, initial notifications (as defined in the P309 legal text) are accepted.

The net effect is the final outcome of all notifications submitted, taking into account rejections, initial notifications, notification overwrites and notification additions.

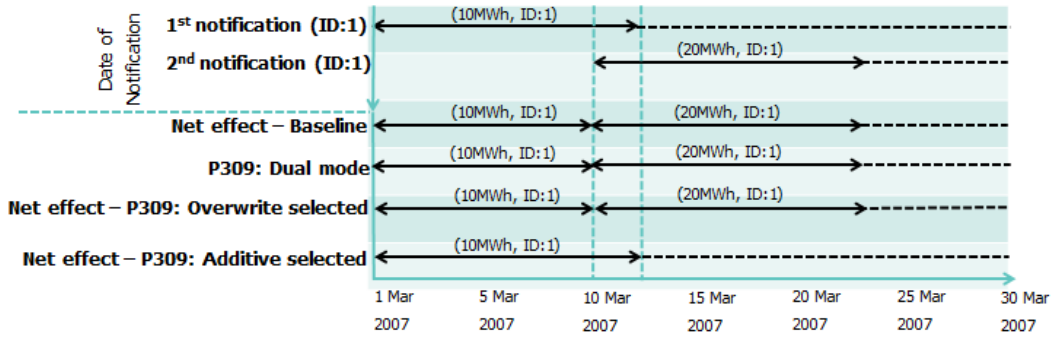
Example scenario

An example of this analysis is as follows:

Scenario 1: Two notifications, with the same IDs, and an overlap of effective (i.e. from/to) periods, with the effective from date of the second notification predating the effective to date of the first notification.



When completed, this example scenario produces the net effects set out below:



In this example the net effect under each row can be described as follows:

- Baseline: second notification is an 'overwrite' notification in relation to the first notification as the IDs are the same and the effective from date of the second notification is before the effective to date of the first notification;

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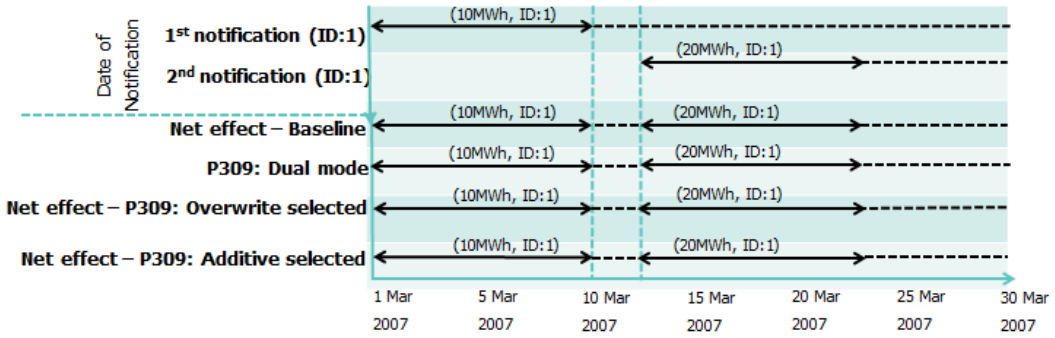
- P309 'dual mode': same scenario as current baseline;
- P309 solution 'overwrite only' (replacement) selected: same scenario as dual mode and current baseline - second notification would be accepted and 'overwrite' the first notification as the effective to date of the first notification is after the effective from date of the second notification; and
- P309 solution – 'additive only' selected: second notification would be rejected as it is an 'overwrite' notification which is rejected in additive mode. The first notification therefore remains in effect until its effective to date.

Rationale for Initial notifications

The Workgroup noted that scenario 3 best demonstrates an 'initial' notification and should help participants understand the difference between these types of notifications and the current baseline and understand the Workgroup's rationale in introducing the concept of initial notifications.

Scenario 3 demonstrates two notifications with the same ID number but no overlap of effective from/to periods (assuming Gate Closure has not passed for any notifications) as shown below:



Under the baseline the second notification would be accepted as an **'additive'** notification in relation to the first notification (although the IDs are the same the effective from date of the second notification is not before the effective to date of the first notification).

However, under the P309 dual mode with 'overwrite' selected and 'additive' selected modes, the second notification would be accepted but would be considered an **'initial' notification** because there is no overlap between the first and second notifications (i.e. this is the determining factor under the definition of an initial notification in the P309 legal text).

The reason for the introduction of initial notifications can be understood by considering the situation without them. Without initial notifications the net effect under the P309 dual mode and additive mode would be the same as under the baseline, and the same as the outcome with initial notifications as shown above. This is because the second notification would be accepted as an additive notification. However, the outcome under the overwrite mode would be different since the second notification would be considered an additive notification; it would be rejected in this mode of operation. The Workgroup considered that this outcome was not acceptable because it would not align with participants' expectations of how notifications should be processed.

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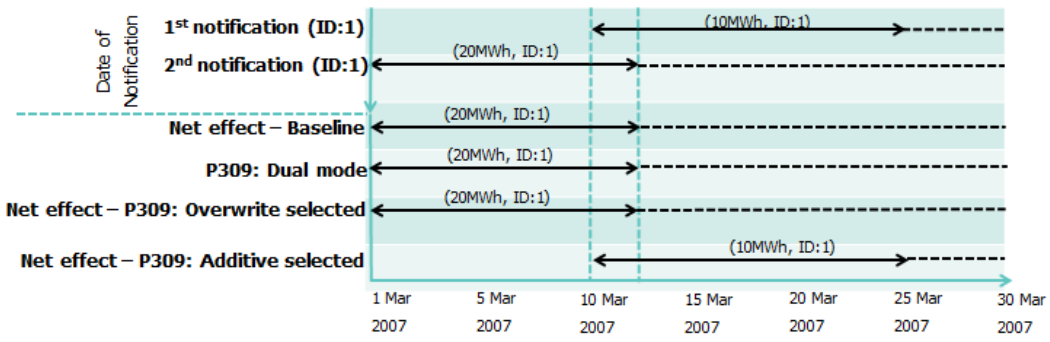
The Workgroup believed that because there is no overlap between the two notifications the second one should be accepted even in overwrite mode, as it is a separate notification. They also believed that it was not appropriate, or clear, that a notification be considered an additive notification where it is not adding to a previous notification (i.e. it shares no overlap with the effective period of a previous notification. The Workgroup therefore agreed to the amendment to the definition of an additive notification and the creation of a definition of an initial notification as set out in Section 3 above.

It should be noted that the definition of a replacement notification is unchanged under the P309 solutions. The Workgroup considered that the replacement definition might also be changed such that a notification could only be a replacement if it had some overlap with the effective period of a preceding notification (i.e. not just that its effective from date is before the effective to date of the earlier notification - see the section below for consideration of how this can be unclear). However, the Workgroup could not develop a definition such that this could be achieved while delivering the objective that the net effect under the dual mode is exactly the same as the outcome under the baseline, which the Workgroup considered vital.

Consideration of counterintuitive outcomes

The Workgroup noted that some of the processing outcomes are somewhat counterintuitive under both the baseline and the P309 arrangements, but agreed that they are in line with the BSC provisions. For example, scenario 5 is two notifications with the same IDs, overlapping effective (i.e. from/to) periods, and with the first notification beginning after the second notification. Under both the baseline and P309 solution, if dual mode or overwrite only is selected, this would result in the second notification overwriting not only the period of the first notification which it overlaps, but also erasing the remainder of the first notification. This is demonstrated below:



However, this is in line with the existing provisions of the BSC in paragraph 2.3.5 of Section P, also reflected under P309, that 'the Replacement Energy Contract Volume Notification shall replace the earlier submitted Energy Contract Volume Notification and, the earlier submitted Energy Contract Volume Notification shall cease to be in force (or if it is not yet in force, shall not come into force)'. For the avoidance of doubt, under P309 additive only mode, because the second notification is an overwrite notification it is rejected and therefore the first notification remains in effect for its effective period.

The Workgroup also highlighted that in scenario 11, the effect of the P309 solution with 'additive' selected would not be what participants might expect the result to be, since the notifications have the same ID. This scenario involves consequential 'initial' notifications

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which a participant might not normally consider to be an 'initial' notification (i.e. informally, since the BSC baseline does not include a definition of an initial notification). The Workgroup was content with the solution in this respect, but considered that such outcomes highlighted that if P309 was approved participants would need education and guidance to understand its impact.

Following detailed analysis of the examples, the Workgroup was overall satisfied that the systems would process notifications in line with the P309 solution and the BSC provisions of the P309 legal text. The Workgroup highlighted that other than the option to select 'overwrite only' or 'additive only', P309 has no impact on participants with respect to how notifications are processed. The Workgroup agreed that the notifications process is not straightforward and suggested that even if P309 is not implemented, the scenarios should be added in some form to the guidance in this area to assist participants using this process.

Additional points on P309 legal text drafting

The Workgroup considered some points of drafting relating to Section P, paragraph 2.3.5 in the BSC baseline and under P309 and the new definitions P309 would add to Annex X-1.

The Workgroup considered the use of the terms "Settlement Days" and "Settlement Periods" in the P309 legal text, and noted that BSC Section P refers to "Settlement Periods" and "Settlement Days" in different contexts.

The wording of the existing BSC drafting in relation to Replacement Notifications makes reference to effective from and to Dates, not Settlement Periods. This terminology does not recognise that an Energy Contract Volume Notification could potentially be submitted at Settlement Period level (i.e. there could be an overlap of Settlement Days, but not necessarily Settlement Periods).

The Workgroup considered that in practice, notifications currently apply at Settlement Period level and this aspect has not caused any issues for participants. The Workgroup agreed to retain the references to an Effective from Date and Effective to Date in relation to Replacement Notifications, but use "Settlement Periods" in the 'additional notification' definition to more clearly reflect the arrangements. It agreed that if there is considered to be any issue or lack of clarity a housekeeping change could be made in the future to amend this difference.

Similarly, the Workgroup also considered the fact that the current wording of the BSC (paragraph 2.3.5) refers to an earlier "submitted" notification when determining whether a notification is additional or replacement. In practice, when notifications are processed at present, rejected notifications are not considered (they are discarded, except for audit purposes), but the Workgroup noted that the current BSC drafting could be interpreted such that a notification should be assessed against a previous notification even if that previous notification is not valid.

The Workgroup initially agreed to carry forward the current wording in relation to Replacement Notifications under P309, on the basis that this wording has not caused issues and this would minimise the change to the BSC provisions. However, upon further consideration the Workgroup was concerned that this approach to the P309 drafting could imply that implementation of P309 should include rejected notifications being taken into account in determining the status of subsequent notifications, which they agreed would be

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incorrect. The Workgroup therefore agreed that the legal text in relation to Replacement Notifications for both P309 Proposed and Alternative Modifications should state "an earlier valid Energy Contract Volume Notification" throughout, in order to clearly reflect the existing criterion and ensure correct implementation of P309, if approved.

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Workgroup's views against the Applicable BSC Objectives

The Workgroup provided its views on both the P309 proposed and alternative solutions against the Applicable BSC Objectives.

The majority of the Workgroup agreed that the P309 alternative solution would overall better facilitate the Applicable BSC Objectives compared with both the existing baseline and the proposed solution. The Proposer considered that the alternative solution is better than the current baseline but believed that the P309 proposed solution is better than the alternative solution.

With the exception of the Proposer, the Workgroup unanimously believed that the Proposed solution would not facilitate the Applicable BSC Objectives compared with the existing baseline because of its retrospective element.

The following table contains the Workgroup's views against each of the Applicable BSC Objectives for both the proposed and alternative solutions:

Does P309 better facilitate the Applicable BSC Objectives?		
Obj	Proposed Solution	Alternative Solution
(a)	• **Neutral** – no impact	• **Neutral** – no impact
(b)	• **Neutral** – no impact	• **Neutral** – no impact
(c)	• **No** (majority): – Though there are benefits associated with the prospective element (see benefits against the alternative) these are outweighed by the drawbacks. – Retrospective element would cause uncertainty in the arrangements. – Changing the arrangements for one Party would be detrimental to competition (other Parties have suffered with similar issues, sometimes with higher costs, but have not raised a Modification to try to correct the mistake). • **Yes** (Proposer): – Would remove the risk for BSC Parties of an inadvertent switch between replacement contract notifications and additional contract notifications.	• **Yes** (unanimous): – Benefit in helping to improve the Settlement systems to remove the scope for errors in the future. – Benefit in improving the BSC and CSDs to reduce ambiguity and risk of errors. – Should help both current participants and new entrants. – Clearer arrangements would be a benefit to new entrants to the market. – Improved risk management and control, particularly for large Parties that may need to make changes to, or replace, complex and long-established systems, and which could therefore risk incurring large costs if errors occur. – Mitigates the risk of errors by Suppliers (the costs of which might be passed to customers, ultimately).
(d)	• **No** (majority): – Retrospective element is detrimental. • **Neutral** (Proposer) - no impact.	• **Yes** (majority): – Reduce current ambiguity and risk. – Benefits in amending current process (reduced ambiguity and risk)

What are the Applicable BSC Objectives?

(a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence

(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System

(c) 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

(d) Promoting efficiency in the implementation of the balancing and settlement arrangements

(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]

(f) Implementing and administrating the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation

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Does P309 better facilitate the Applicable BSC Objectives?		
Obj	Proposed Solution	Alternative Solution
		but increased complexity (need to manually choose notification type and may need to switch between notification types depending on how an Authorisation is used). • **Neutral** (Proposer) – no impact.
(e)	• **Neutral** – no impact	• **Neutral** – no impact
(f)	• **Neutral** – no impact	• **Neutral** – no impact

The majority of the Workgroup therefore recommends that the P309 Alternative Modification is **approved**.

Assessment Consultation respondents' views against the Applicable BSC Objectives

Proposed vs current baseline

The majority of the respondents to the P309 Assessment Consultation agreed with the Workgroup's majority view that the P309 proposed solution does not better facilitate Applicable BSC Objectives (c) and (d) than the current baseline. The reasons provided by these respondents are consistent with those of the Workgroup. Only one respondent disagreed (this respondent was also the Proposer of the Modification).

Respondents commented that they had sympathy for the Proposer but that the retrospective element generates uncertainty and would undermine the investment made by other participants to avoid such errors. As such, respondents agreed that the P309 Proposed solution would be contrary to effective competition under Applicable BSC Objective (c), as an attempt to correct one BSC Party's error, whilst others have incurred significant costs and not had any opportunity to make corrections is unfair. A respondent also noted that the circumstances could have been reasonably foreseen i.e. any change to a participant's system should be fully tested and validated before implementation. This lack of risk management is therefore detrimental to Applicable BSC Objective (d).

Alternative vs current baseline

Respondents to the P309 Assessment Consultation unanimously agreed with the Workgroup's initial unanimous view that the P309 alternative solution does better facilitate Applicable BSC Objectives (c) and (d) than the current baseline. The reasons provided by these respondents are in line with those of the Workgroup.

Respondents commented that introducing an explicit parameter that allows BSC Parties and their ECVNA to determine their intended mode of operation seems a sensible additional control measure, and is a pragmatic way of avoiding inadvertent errors occurring in the future by increasing certainty and reducing risk. They also noted that there is an overall benefit in adding more detail to the BSC and associated processes to help make them clearer, particularly for new entrants to the market.

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Proposed vs Alternative

The majority of the respondents to the P309 Assessment Consultation agreed with the Workgroup's majority view that the P309 alternative solution is better than P309 proposed solution. The reasons provided by these respondents are in line with those of the Workgroup. Only one respondent disagreed that the P309 alternative solution is better than the P309 proposed solution, for the reasons identified by the Proposer of the P309 Modification. Respondents commented that retrospective changes are not desirable but that the prospective element provides the benefit of an additional risk management tool available to all BSC Parties.

You can find the full responses to the Assessment Consultation in Attachment D.

Overall the majority of the P309 Workgroup believes that the P309 alternative solution does better facilitate Applicable BSC Objectives (c) and (d) and therefore recommends that the P309 alternative solution is approved.

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Panel's initial discussions

Retrospection

The Ofgem representative highlighted that the Ofgem criteria on retrospection (as detailed in section 7) should be referred to as 'guidance' rather than 'criteria'. Ofgem noted that the guidance refers to the three particular circumstances which could give rise to the need for a retrospective rule change which it uses on a case-by-case basis to aid its decision. Ofgem advised that these circumstances are included in its urgency guidance document.

Panel's initial views against the Applicable BSC Objectives

Proposed vs current baseline

The Panel **unanimously** agrees with the Workgroup's majority view that P309 Proposed solution **would not better facilitate Applicable BSC Objectives (c) and (d)** compared with the existing baseline for the same reasons identified by the Workgroup as follows:

Proposed solution		
Obj	Does better facilitate (minority)	Does not better facilitate (majority)
(c)	- Would remove the risk for BSC Parties of an inadvertent switch between replacement contract notifications and additional contract notifications.	– Though there are benefits associated with the prospective element (see benefits against the alternative) these are outweighed by the drawbacks. – Retrospective element would cause uncertainty in the arrangements. – Changing the arrangements for one Party would be detrimental to competition (other Parties have suffered with similar issues, sometimes with higher costs, but have not raised a Modification to try to correct the mistake).
(d)	N/A	- Retrospective element is detrimental.

Report Phase Consultation Question
Do you agree with the Panel's initial unanimous recommendation that P309 Proposed Modification does not better facilitate the Applicable BSC Objectives and should therefore be rejected?
The Panel invites you to give your views using the response form in Attachment E

Alternative vs current baseline

The Panel **unanimously** agrees with the Workgroup's unanimous view that P309 Alternative solution **would better facilitate Applicable BSC Objectives (c) and (d)** compared with the existing baseline. The views of the Panel are in line with the views of the Workgroup and the responses received to the P309 Assessment Consultation as follows:

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Alternative solution		
Obj	Does better facilitate (unanimous)	Does not better facilitate (n/a)
(c)	- Benefit in helping to improve the Settlement systems to remove the scope for errors in the future. – Benefit in improving the BSC and CSDs to reduce ambiguity and risk of errors. – Should help both current participants and new entrants. – Clearer arrangements would be a benefit to new entrants to the market. – Improved risk management and control, particularly for large Parties that may need to make changes to, or replace, complex and long-established systems, and which could therefore risk incurring large costs if errors occur. – Mitigates the risk of errors by Suppliers (the costs of which might be passed to customers, ultimately).	N/A
(d)	– Reduce current ambiguity and risk. – Benefits in amending current process (reduced ambiguity and risk) but increased complexity (need to manually choose notification type and may need to switch between notification types depending on how an Authorisation is used).	N/A

Report Phase Consultation Question
Do you agree with the Panel's initial unanimous recommendation that P309 Alternative Modification does better facilitate the Applicable BSC Objectives and should therefore be approved?
The Panel invites you to give your views using the response form in Attachment E

The Panel **unanimously** agrees with the Workgroup's majority view that P309 Alternative solution is better than the P309 Proposed Modification.

Report Phase Consultation Question
Do you agree with the Panel's initial unanimous recommendation that P309 Alternative Modification is better than P309 Proposed Modification?
The Panel invites you to give your views using the response form in Attachment E

Panel's views on draft legal text

The Panel **unanimously** agrees that the proposed changes to the BSC in Attachments A and B deliver the intention of the P309 Proposed and Alternative Modifications.

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Report Phase Consultation Questions
Do you agree with the Panel's initial unanimous view that the redlined changes to the BSC deliver the intention of the P309 Proposed and Alternative solutions?
The Panel invites you to give your views using the response form in Attachment E

Panel's views on the proposed Implementation Date

The Panel **unanimously** agrees with the proposed Implementation Date for the P309 Proposed and Alternative Modifications as detailed in Section 6.

Report Phase Consultation Question
Do you agree with the Panel's recommended Implementation Date?
The Panel invites you to give your views using the response form in Attachment E

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10 Recommendations

The BSC Panel initially recommends to the Authority:

- That the P309 Alternative Modification should be **approved** and that the P309 Proposed Modification should be **rejected**;
- An Implementation Date for the P309 Proposed Modification of:
  - **5 November 2015** as part of the November 2015 BSC Systems Release if an Authority decision is received on or before 3 July 2015; or
  - **25 February 2016** as part of the February 2016 BSC Systems Release if an Authority decision is received after 3 July 2015 but on or before 22 October 2015.
- An Implementation Date for the P309 Alternative Modification of:
  - **5 November 2015** as part of the November 2015 BSC Systems Release if an Authority decision is received on or before 3 July 2015; or
  - **25 February 2016** as part of the February 2016 BSC Systems Release if an Authority decision is received after 3 July 2015 but on or before 22 October 2015.
- The draft BSC legal text for the P309 Proposed Modification; and
- The draft BSC legal text for the P309 Alternative Modification.

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Appendix 1: Workgroup Details

Workgroup's Terms of Reference

Specific areas set by the BSC Panel in the P309 Terms of Reference
What changes are needed to BSC documents, systems and processes to support P309 and what are the related costs and lead times?
Consider the appropriate implementation approach for the proposed changes
What are the impacts on Settlement?
What is the materiality of the risk identified by P309?
Discuss the current ECVNA Authorisation process • Should there be both additional and replacement contract notifications?
Are there any Alternative Modifications?
Does P309 better facilitate the Applicable BSC Objectives than the current baseline?

Assessment Procedure timetable

P309 Assessment Timetable	
Event	Date
Panel submits P309 to Assessment Procedure	10 Jul 14
Workgroup Meeting 1	23 Jul 14
Workgroup Meeting 2	8 Sep 14
Assessment Procedure Consultation	19 Sep 14 – 10 Oct 14
Workgroup Meeting 3	16 Oct 14
Workgroup Meeting 4 (*teleconference*)	7 Nov 14
Workgroup Meeting 5 (*teleconference*)	27 Nov 14
Workgroup Meeting 6	15 Dec 14
Panel considers Workgroup's Assessment Report	15 Jan 15

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Workgroup membership and attendance

P309 Workgroup Attendance							
Name	Organisation	23 Jul 14	8 Sep 14	16 Oct 14	7 Nov 14	27 Nov 14	15 Dec 14
Members							
Dean Riddell	ELEXON *(Chair)*	✓	✓	✓	✓	✓	✓
Claire Anthony	ELEXON *(Lead Analyst)*	✓	✓	✓	✓	✓	✓
Bill Reed	RWE *(Proposer)*	✓	✓	✓	☎	☎	✓
Esther Sutton	E.ON	✓	✓	✓	☎	☎	✓
Gary Henderson	ScottishPower	✓	✓	✓	☎	☎	✓
Mark Edwards	GDF Suez	☎	✓	✗	☎	☎	☎
Andrew Colley	SSE	✓	✓	✓	✗	✗	✗
Phil Russell	Independent Consultant	✗	✓	✓	☎	☎	✓
Attendees							
Jonathan Priestley	ELEXON *(Design Authority)*	✓	✓	✗	✗	✗	✗
Nicholas Rubin	ELEXON *(Design Authority)*	✗	✓	✓	✓	✓	✓
Tim Kerr	ELEXON *(Lead Lawyer)*	✓	✓	✓	✓	✓	✓
James Earl	Ofgem	✓	✓	✓	☎	☎	✓
Vijay Selvaraj	Cognizant	✓	✓	✓	✗	✗	✗
Andy Howden	CGI	✓	✗	✗	✗	✗	✗

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Appendix 2: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Glossary of Defined Terms	
Acronym	Definition
BSC	Balancing and Settlement Code
BSCP	Balancing and Settlement Code Procedure
DF	Post-Final Settlement Run
ECVAA	Energy Contract Volume Aggregation Agent
ECVN	Energy Contract Volume Notifications
ECVNA	Energy Contract Volume Notification Agents
ESD	Extra-Settlement Determinations
FTP	file transfer protocol
GB	Great Britain
GTMA	Grid Trade Master Agreement
IDD	Interface Definition and Design
IWA	Initial Written Assessment
RF	Final Reconciliation Run
SD	Service Description
TDC	Trading Disputes Committee
URS	User Requirements Specification
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
3	BSC Sections (BSC Section P) page on the ELEXON website	http://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/
5	BSCP71 webpage on ELEXON website	http://www.elexon.co.uk/wp-content/uploads/2011/10/bscp71_v11.0.pdf

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External Links		
Page(s)	Description	URL
12	P210 page on the ELEXON website	http://www.elexon.co.uk/mod-proposal/p210-revisions-to-the-text-in-section-p-related-to-single-notifications-of-energy-contract-volumes-and-metered-volume-reallocations/
12	P19 Ofgem decision letter	http://www.elexon.co.uk/wp-content/uploads/2012/02/p19_ofgem_dec.pdf
12	P37 webpage on ELEXON website	http://www.elexon.co.uk/mod-proposal/p037-to-provide-for-the-remedy-of-past-errors-in-energy-contract-volume-notifications-and-in-metered-volume-reallocation-notifications/
12	Ofgem urgency guidance on the Ofgem website	https://www.ofgem.gov.uk/publications-and-updates/ofgem-guidance-code-modification-urgency-criteria

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