

P311 'Required Housekeeping Changes to Implement P291 and P295'

This Modification proposes minor changes to BSC Sections Q and V to ensure the implementation of the P291 legal text on 31 December 2014 will not impact the approved P295 solution, which will be implemented on 16 December 2014.

The Fast Track Self-Governance Objection Window for P311 closes:

5pm on Friday 5 September 2014

If no objections are received by this time, the Panel's decision is final.



The BSC Panel has **approved** P311 as a Fast Track Self-Governance Modification

This Modification is expected to impact:

- ELEXON

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

▶ 04 Report Phase



Any questions?

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About This Document

This is the P311 Fast Track Self-Governance Modification Report, which ELEXON has submitted to the Authority, the Transmission Company and all BSC Parties.

P311 is a Fast Track Self-Governance Modification, so it does not go to the Authority for decision. The BSC Panel has approved P311 for implementation on 31 December 2014.

In accordance with BSC Section F7.3, Parties have until 5 September 2014 to object to the Panel's decision, stating why they do not believe P311 meets the Fast-Track Self-Governance criteria. If no objection is raised by this time, the Panel's decision is final.

There are two parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits, drawbacks and implementation approach. It also summarises the Panel's key views on the Modification.
- Attachment A contains the approved redlined changes to the BSC for P311.

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Why Change?

There are six instances where both P291 and P295 impact the same text. Since P291 was drafted before P295 was raised, the P291 legal text does not take into account those changes approved under P295. This in effect means that when P291 is implemented it will overwrite the changes introduced by P295, for these six instances.

Solution

In order to facilitate the implementation of both P291 and P295, this Modification proposes a set of amalgamated legal text to allow for P291 to be implemented without overwriting the approved changes introduced by P295.

Impacts & Costs

This Modification will not impact BSC Parties, Party Agents or the Transmission Company. It only ensures the correct implementation of both P291 and P295.

Implementation

The Panel has agreed an Implementation Date of 31 December 2014.

Decision

The Panel has unanimously agreed to raise and approve P311 as a Fast Track Self-Governance Modification.

2 Why Change?

Background

[P291¹ 'REMIT Inside Information Reporting Platform for GB Electricity'](#) has been approved for implementation on 31 December 2014. P291 requires changes to the Balancing Mechanism Reporting Service (BMRS) and BSC Sections Q and V. These changes are required to enable the reporting of necessary information to meet the requirements of The Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT) regulation.

Subsequent to the P291 decision, [P295² 'Submission and publication of Transparency regulation data via the BMRS'](#) has been approved for implementation on 16 December 2014. P295 requires changes to the BMRS and BSC Sections Q and V to enable the reporting and forwarding of required Transparency regulation data.

When P291 was approved by the Authority in August 2013, the BSC legal text changes directed as part of the Modification were drafted against Section Q v22.0 and Section V v26.0 (the baseline at the time).

When P295 was approved by the Authority on 22 January 2014, the BSC legal text changes for the Modification were also drafted against Section Q v22.0 and Section V v26.0. This was necessary and correct as P295 will be implemented prior to P291 and therefore must be drafted against the current BSC baseline.

What is the issue?

There are six instances (as listed below) where both P291 and P295 impact the same text:

- Section Q 1.1.1
- Section V 2.2.1
- Section V new 2.2.2B (introduced by P291)
- Section V 2.3.3
- Section V 2.5.1
- Section V Annex V-1

Since P291 was drafted before P295 was raised, the P291 legal text does not take into account those changes approved under P295, for these six instances. This in effect means that when P291 is implemented on 31 December 2014, it will overwrite the changes introduced by P295 on 16 December 2014 for the six instances where both Modifications impact the same sections.

For example, both P291 and P295 introduce a new BSC Section V 2.3.3 (d). This means that a change is required to the approved P291 legal text to allow for the introduction of a new BSC Section V 2.3.3 (e) instead, as shown below in an excerpt from the draft redlined BSC changes for this Modification (in blue for P295 and in red for P291):

¹ Further information about P291 can be found on the [P291](#) page of the ELEXON website.

² Further information about P295 can be found on the [P295](#) page of the ELEXON website.

Amend paragraph 2.3.3 to read as follows:

2.3.3 BMRS data will be available on the BMRS as follows:

- (a) data provided by the Transmission Company pursuant to Section Q (and listed in Table 1) will be available within 5 minutes after the BMRA received such data from the Transmission Company;
- (b) data relating to a Settlement Period and established by the BMRA in accordance with paragraph 2.6 will be available within 45 minutes after the end of the relevant Settlement Period;~~and~~
- (c) data provided by the BSCCo pursuant to Section Q (and listed in Table 1A) will be available within 1 Business Day after the BMRA received such data from the BSCCo; ~~and~~
- (d) Transparency Regulation Data listed in Table 1B will be published as soon as reasonably practicable (taking into account any technical constraints) after such data is received by the BMRA; ~~and~~
- (e) Inside Information Data will be published as soon as reasonably practicable (taking into account any technical constraints) after being received from the Transmission Company or BSCCo.

Proposed solution

In order to facilitate the implementation of both the P291 and P295 solutions, this Modification proposes a set of amalgamated legal text to allow for P291 to be implemented without overwriting the approved changes introduced by P295.

Amendments will be made to the following six instances where legal drafting for both Modifications interact:

- Section Q 1.1.1 – Create sub-bullet (k), meaning that the sub-bullet (j) introduced by P295 is not overwritten.
- Section V 2.2.1 – Add reference to Table 1C in addition to Table 1B.
- Section V new 2.2.2B – Create new 2.2.2C, meaning that the new 2.2.2B introduced by P295 is not overwritten, also Reference Table 1C instead of Table 1B.
- Section V 2.3.3 – Create sub-bullet (e), meaning that the sub-bullet (d) introduced by P295 is not overwritten.
- Section V 2.5.1 – Create sub-bullet (f), meaning that the sub-bullet (e) introduced by P295 is not overwritten.
- Section V Annex V-1 – Add Table 1C in addition to Table 1B.

There will be no changes to the approved P291 or P295 wording, except where the removal or addition of words like 'and' are required (i.e. for addition or removal of bullet points) as well as changes to table and paragraph numbers. Attachment A contains the legal text changes approved by the Panel.

Further information on P311 can be found on the [P311 page](#) of the ELEXON website.

Impacts and costs

This Modification will not impact BSC Parties, Party Agents or the Transmission Company. It only ensures the correct implementation of both the P291 and P295 approved solutions.

The estimated central implementation costs will equate to £240, or one ELEXON man day.

Impact on Code	
Code Section	Potential Impact
Section Q	Changes will be required to implement the solution.
Section V	

ELEXON's views on the Applicable BSC Objectives

ELEXON believes that this Modification would better facilitate the achievement of:

- **Applicable BSC Objective (d)** as making these required housekeeping changes will allow for both P291 and P295 to be implemented successfully and as intended, promoting efficiency.

Implementation Date

The Panel has approved an Implementation Date for P311 of **31 December 2014** (simultaneously with P291).

The 15 Working Day objection window will close on 5 September 2014. If an objection is received, the implementation of the Modification will be suspended and the objection tabled at the next available Panel meeting; which in the case of this Modification would be on 11 September 2014.

If no objections are received, the Panel will be advised and the Modification will be implemented on 31 December 2014.



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 administering 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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What is the Fast Track Self-Governance Criteria?

A Modification Proposal which:

(i) if implemented would satisfy the Self-Governance Criteria; and

(ii) falls within the scope of Section F2.1.1(d)(iv) (without limiting the right of any person specified in paragraph 2.1.1 to propose a Fast Track Self-Governance Modification Proposal) and which is required to correct an error in the Code or as a result of a factual change, including but not limited to:

(a) updating names or addresses listed in the Code;

(b) correcting minor typographical errors;

(c) correcting formatting and consistency errors, such as paragraph numbering; or

(d) updating out of date references to other documents or paragraphs.

Panel's views on Fast Track

The proposed changes to BSC Sections Q and V under P311 are housekeeping changes only, which are required to enable both P291 and P295 to be implemented successfully and as intended.

The Panel **unanimously** agrees with ELEXON's view that P311 meets the Fast Track Self-Governance Modification criteria.

Panel's views on the Applicable BSC Objectives

The Panel agreed that this Modification would better facilitate the achievement of:

- **Applicable BSC Objective (d)** as making these required housekeeping changes will allow for both P291 and P295 to be implemented successfully and as intended, promoting efficiency.

Panel's views on the Implementation Date

The Panel agreed with ELEXON's view that P311 should be implemented in line with P291 on 31 December 2014. This will enable both P291 and P295 to be implemented without any of the legal text clashing.



The BSC Panel has unanimously agreed:

- That P311 should be progressed as a Fast Track Self-Governance Modification;
- That P311 should be **approved**;
- An Implementation Date for P311 of **31 December 2014**; and
- The BSC legal text for P311.

Recommendation

The BSC Panel has unanimously approved P311 as a Fast Track Self-Governance Modification.

Appendix 1: Estimated Progression Effort

The following tables contain the estimated effort in progressing P311:

Assessment Effort	
Participant	Effort (man days)
ELEXON	2
Total	2

Appendix 2: Glossary & References

Acronyms

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

Glossary of Defined Terms	
Acronym	Definition
BMRS	Balancing Mechanism Reporting Service
REMIT	The Regulation on Wholesale Energy Markets Integrity and Transparency

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	P291 page of the ELEXON website	http://www.elexon.co.uk/mod-proposal/p291/
3	P295 page of the ELEXON website	http://www.elexon.co.uk/mod-proposal/p295/
6	P311 page of the ELEXON website	http://www.elexon.co.uk/mod-proposal/p311/
6	BSC Sections page of the ELEXON website	http://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/
6	BSCP40 page of the ELEXON website	http://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
6	P296 page of the ELEXON website	http://www.elexon.co.uk/mod-proposal/p296/