

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

P333 'Inclusion of DSBR volumes into the cashout price in time for publication after the end of the Settlement Period'

P333 contends that not including DSBR volumes in cash-out until the II Settlement Run could result in misleading signals to market participants. P333 would require the Transmission Company to provide its best estimate of DSBR volumes as part of its initial submission of Balancing Services Adjustment Data.

This Assessment Procedure Consultation for P333 closes:

5pm on Monday, 23 May 2016

The Workgroup may not be able to consider late responses.



The P333 Workgroup initially recommends **approval** of P333

This Modification is expected to impact:

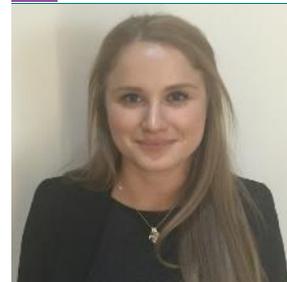
- Transmission Company
- ELEXON



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About This Document

The purpose of this P333 Assessment Procedure Consultation is to invite BSC Parties and other interested parties to provide their views on the merits of P333. The P333 Workgroup will then discuss the consultation responses, before making a recommendation to the BSC Panel at its meeting on 9 June 2016 on whether or not to approve P333.

There are three 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 draft redlined changes to the BSC for P333.
- Attachment B contains the specific questions on which the Workgroup seeks your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish the Workgroup to consider.

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1 Summary

Why Change?

The Proposer notes that cash-out is meant to provide the principle incentive for demand and supply to balance in the short term. To provide this incentive, cash-out prices need to be accurate in the short term in order to form appropriate and timely market signals.

The Proposer believes that [P305 'Electricity Balancing Significant Code Review Developments'](#) introduced potentially 'explosive' cash-out and contends that this, coupled with Demand Side Balancing Reserve (DSBR) being priced at the Value of Lost Load (VoLL) (£3000/MWh), means that the DSBR volume not being included in the cashout calculation until five Working Days after it has been utilised could lead to a very large positive change in the cash-out price in the Interim Information (II) Run compared to that reported by the end of Settlement Period.

The Proposer also notes that the use of DSBR could also create an expectation that prices will rise to £3000/MWh which, because of the Net Imbalance Volume (NIV) tagging process, may not happen.

The Proposer contends that either scenario means the five day delay in including DSBR volumes in cash-out could result in misleading real-time signals being made to market participants, and that this could lead to sub-optimal trading decisions being made on days when scarcity is apparent.

Solution

P333 would place a specific requirement on the Transmission Company to provide its best estimate of DSBR volumes as part of its initial submission of Balancing Services Adjustment Data (BSAD) by the end of the relevant Settlement Period.

Impacts

P333 will impact the Transmission Company and ELEXON.

Implementation

P333 is proposed for implementation on 5 November 2015 (November 2015 BSC Systems Release).

Recommendation

The Workgroup's initial majority view is that P333 **better** facilitates Applicable BSC Objective (b), (c) and (d) and therefore initially recommends that P333 should be **approved**.

Background

Balancing services are used by the Transmission Company in its role as System Operator to balance supply and demand in real time. These are also used in the calculation of imbalance prices (also known as cash-out prices).

Demand Side Balancing Reserve

In December 2013, Ofgem published its decision to accept an application by the Transmission Company to introduce the new balancing service DSBR.

The DSBR service is aimed at non-domestic consumers with the ability to reduce demand/load-shift or run small embedded/on-site generation for at least an hour during a winter evening peak period. At the highest level, this will enable the System Operator to ask large energy users to reduce their demand in exceptional circumstances, and would remunerate them for doing so.

Balancing Service Adjustment Data

The BSAD Methodology Statement sets out information on relevant balancing services that are taken outside of the Balancing Mechanism (BM) to balance the system and are taken into account under the BSC for the purposes of determining Imbalance Prices.

The BSC requires the Transmission Company to submit its best estimate of BSAD in relation to a Settlement Period as soon as reasonably practicable after Gate Closure for, and in any event not later than the end of, that Settlement Period. This is so BSAD can be used in the Balancing Mechanism Reporting Agent (BMRA)'s calculation of an indicative System Price within 15 minutes of the end of a Settlement Period.

The BSC also requires the Transmission Company to submit the actual BSAD the following day. This is known in the BSAD Methodology Statement as "post event re-submission". This post event re-submission ensures that the Settlement Administration Agent's (SAA) calculation of System Prices uses the actual volume(s) of BSAD when calculating a final System Price.

The BSAD Methodology Statement is owned by National Grid, and may only be modified in accordance with the processes set out in [Standard Condition C16](#) of the Transmission Licence. National Grid is required to annually consult on the C16 statements, which includes the BSAD Methodology Statement. As a result of discussions under [Issue 56 'Treatment of the new SBR and DSBR services in the imbalance price'](#), and as part of their annual consultation, the BSAD Methodology Statement was amended to include DSBR volumes in its determination of BSAD (this version went live on 5 November 2015).

Current Arrangements

Initial Cash-out price

The BMRA calculates and publishes an indicative cash-out price for every Settlement Period based on the data sent to it. This initial price is replaced by an improved cash-out price that contains more accurate volumes and data five Working Days later, as part of the II Run.

The initial estimate of BSAD from the Transmission Company (by the end of the Settlement Period) is used in the BMRA's calculation of the initial cash-out price. The BSAD Methodology Statement specifies that DSBR will not be included in the initial estimate (BSAD Methodology Statement v12, effective 5 November 2015, available on the [Transmission Licence C16 Statements page](#) of the National Grid website).

DSBR volumes are included in the post event re-submission BSAD issued the next day. Therefore the information in the revised BSAD is used in the II Run cash-out price five Working Days later.

Under implemented Modification [P323 'Enabling inclusion and treatment of SBR in the Imbalance Price'](#) it was argued that a forecast DSBR volume should be included in the initial estimate of BSAD. However, the inclusion of DSBR in the initial BSAD was not possible because of the risks associated with the only potentially feasible approach of making manual interventions to an existing automated process in short timescales (and potentially out of normal Working Hours).

What is the issue?

The Proposer notes that cash-out is meant to provide the principle incentive for demand and supply to balance in the short term. To provide this incentive, cash-out prices need to be accurate in the short term in order to form appropriate and timely market signals.

The Proposer believes that P305 introduced potentially explosive cash-out and contends that this, coupled with DSBR being priced at the VoLL (£3000/MWh), means that the DSBR volume not being included until five Working Days after it is utilised could lead to a very large positive change in the cash-out price in the II Run compared to that reported by the end of Settlement Period.

The Proposer also notes that the use of DSBR could also create an expectation that prices will rise to £3000/MWh which, because of the NIV tagging process, may not happen.

The Proposer contends that either scenario means the five Working Day delay in including DSBR volumes in cash-out could result in misleading real-time signals being made to market participants, and that this could lead to sub-optimal trading decisions being made on days when scarcity is apparent.

Proposed solution

P333 proposes that DSBR volumes be included in the indicative imbalance price calculation carried out by the BMRA (ten minutes after the end of the Settlement Period). DSBR is a balancing service that can only be called upon between 16:00 – 20:00 (Settlement Periods 33-40) on Working Days between November and February.

The Department for Energy and Climate Change (DECC) have indicated that they plan to bring forward the Capacity Market to 2017/18. Ofgem have published a letter stating that if the capacity market is brought forward, they would expect to amend National Grid's licence so as to ensure that the DSBR cost recovery arrangements no longer apply for the 2017/18 winter. This would result in DSBR not being used after this coming winter (2016/17). Should DSBR be made redundant, then the solution to P333 will only ever be needed for four months (November 2016 – February 2017).

P333 seeks to be in place at the start of the winter months, aligning with the November 2016 BSC Systems Release. As there is not enough time to implement a systems change for the winter 2016/17 period, P333 proposes a manual work around.

Manual process solution

In order to ensure that P333 can be implemented in time for the November 2016 BSC Release (as requested by the Proposer), P333 proposes that a temporary manual process be implemented until such a time as either an automated system can be implemented or that DSBR is redundant, whichever is sooner.

In the proposed solution, the DSBR system would auto-trigger an email, with the DSBR Standard Dispatch data as an attachment in .csv format, to the National Grid Settlements team. The Gate Closure BSAD file (sent around 59 minutes ahead of the start of each settlement period) would be manually updated with DSBR data and uploaded in National Grid's Information Provisioning system. The revised BSAD file would then send it to ELEXON systems each half hour in time for the Indicative Price calculation.

A sequential break down of the P333 manual process relies on the following steps:

1. The Transmission Company updates the DSBR dispatch system to calculate and send Dispatch data for each applicable Settlement Period.
2. The Transmissions Company to send no later than [ten minutes after the end of the relevant Settlement Period], their estimate of DSBR as a Balancing Service Adjustment Action (BSAA).

The proposed solution depends on the manual process being able to allocate unique and sequential IDs for the DSBR actions.

Conclusions

The Workgroup considered the proposed solution alongside another option. Both solutions involved a manual process, with an estimated three month implementation. The Workgroup agreed to progress the proposed solution, as it was viewed as the most cost effective of the two options. An overview of the other solution is provided under Section 6.

Assessment Consultation Question

Can you quantify the costs and benefits associated with the Modification?

The Workgroup invites you to give your views using the response form in Attachment B

Legal text

Attachment A contains the proposed changes to the BSC. Changes may be needed to certain Code Subsidiary Documents. These changes have not been specified at this point. But will be provided as part of the Report Phase Consultation.

Assessment Consultation Question

Do you agree that the draft legal text and redlined changes in Attachment A deliver the intention of P333?

The Workgroup invites you to give your views using the response form in Attachment B

4 Impacts & Costs

Estimated central implementation costs of P333

This Modification will be a document-only change to update one Section of the BSC. There are no system impacts and no impact on BSC Agents.

The central implementation costs will be approximately £240 (one ELEXON man day) to implement the relevant document changes.

Participant impacts and costs

This Modification is a Code-only change. It is only expected to impact the Transmission Company, which will need to provide its best estimate of DSBR volumes as part of its initial submission of BSAD by the end of the relevant Settlement Period. However, the Workgroup seeks confirmation of this through this Assessment Consultation.

A breakdown of the Transmission Company's indicative cost is provided in the table below:

Indicative Costs	
Particulars	Cost in £k
Implement P333 changes	93
Integration Testing and UAT	20
Governance and Analysis	30
Risk Margin	21
Total cost	164

Assessment Consultation Questions

Will P333 impact your organisation?

Will your organisation incur any costs in implementing P333?

The Workgroup invites you to give your views using the response form in Attachment B

P333 impacts

Impact on BSC Parties and Party Agents

Party/Party Agent	Potential Impact
None identified at this time	

Impact on Transmission Company

The Transmission Company will notify the BSC Agent when DSBR is dispatched.

Impact on BSCCo

Document changes will be implemented.

Impact on Code	
Code Section	Impact
Section Q	Changes would be required to implement this Modification.

5 Implementation

Recommended Implementation Date

The Workgroup recommends an Implementation Date for P333 of 3 November 2016 (as part of the November 2016 BSC Systems Release) if the Authority's decision is received on or before 3 August 2016.

Assessment Consultation Questions

Do you agree with the Workgroup's recommended Implementation Date?

The Workgroup invites you to give your views using the response form in Attachment B



Rationale for a Manual Solution

The Workgroup noted that an automated solution would not be feasible at this time, due to the following considerations:

- A solution is only required until DSBR is no longer a tool available to the System Operator to balance the system. This is expected to after winter 2016/17 but is awaiting confirmation from DECC and Ofgem.
- Making the changes to BSC System as part of the November 2016 Release would likely have exposed that Release to a very high level of risk due to an already busy programme of work, the very short timescales to develop system changes and the limited availability of resources.
- Considering these factors, to ensure that a solution was implemented in time for winter 2016/17, a manual solution was considered a pragmatic way forward. However, it was noted that even if a manual solution was implemented initially, any change should be implemented in such a way to enable an enduring, automated solution that would produce timely imbalance prices to be activated at some point in the future.
- Any enduring solution involving BSC System changes would need to be progressed through a separate modification if P333 is approved. This would be targeted at a later BSC Release.

IDs

Under section 6.3.2 (a) of BSC Section Q 'Balancing Mechanism Activities', an ID is described as "the unique sequential number for each Balancing Services Adjustment Action".

Consideration of Risks

Potential Human Error

The proposed solution involves manual intervention and effort overhead for National Grid as the BSAD file would have to be manually updated. Consequently, a business procedure would be required to mitigate the "human error" risk.

ID Allocation

The Workgroup cited some issues arising from the allocation of IDs. In the current process, the Transmission Company allocates a unique sequential ID for each BSAA. The Workgroup discussed the feasibility of using a generic DSBR identifier in place of an ID, to reduce the complexity of the process and minimise the risk of errors. The Workgroup noted that changes to IDs could have an impact on Parties with automated systems, which may be set up to accept only unique, sequential IDs. It was suggested that Parties be asked as part of the consultation, whether their systems would be impacted by changes to the IDs.

Assessment Consultation Question

Do your internal systems require BSAD IDs to be unique and sequential?

The Workgroup invites you to give your views using the response form in Attachment B

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Visibility of DSBR Dispatch

In addition to the proposed solution, the Workgroup also requested that the Transmission Company increase the visibility of DSBR Standard Dispatch for the impacted Settlement Periods.

The Transmission Company indicated that it may be possible to publish the DSBR dispatch data with contracted and requested DSBR capacity for respective Settlement Periods. In order to implement this solution in a cost effective way, the DSBR Dispatch information would be published on an external webpage with a hyperlink provided on the National Grid website.

The estimated cost of implementing the add-on solution of publishing DSBR Standard Dispatch data on a website, for facilitating Market transparency, would be an additional £70k. However, the Transmission Company representative advised that this is likely to be at top end of the range of costs.

Assessment Consultation Question

Do you support the publication of the DSBR dispatch data, either as: a standalone solution if P333 is rejected; or in addition to P333.

Do the risks of the manual workaround outweigh the benefits of the progressing the Modification?

The Workgroup invites you to give your views using the response form in Attachment B

Consideration on alternative manual and enduring solutions

Manual process solution

In addition to the proposed solution, the Workgroup also considered an alternative manual process. The alternative manual process relies on the following steps:

1. The BMRA has someone on standby during the relevant periods (Working Days, 16:00 – 20:00, November – February)
2. If DSBR is going to be despatched, the Transmission Company will warn the SAA by raising a call with the BSC Service Desk. The Transmission Company has indicated that the notice for DSBR dispatch is two hours before the Settlement Period. However this timeline is not definitive.
3. The Systems Operator's Systems will send the BSAD file shortly after Gate Closure as currently (this would not include DSBR).
4. If DSBR is despatched, then once the instructed volume is known, but in any case by [15 minutes after the start of the Settlement Period], the DSBR system would email the BSC Service Desk details of the DSBR actions. Data items would be as per the Disaggregated Balancing Services Adjustment Data (DISBSAD) file i.e. Settlement Day, Settlement Period, ID, Cost, Volume and SO-Flag.
5. The BMRA (having been warned to expect the email in step 2) pick up the email and manually enter the provided BSAD actions into the Balancing Mechanism Reporting Service (BMRS) system (using data entry screens). They will have about [35 minutes] to do this i.e. the window from 15 minutes into the Settlement Period to 20 minutes after it ends.

6. On Day (D) +1, the DSBR actions should be included in the DISBSAD file sent to the BMRA by the Transmission Company (as currently).
7. Once the instructed volume is known, but in any case by [15 minutes after the start of the Settlement Period], the DSBR system would email the BMRA details of the DSBR actions. Data items would be as per the DISBSAD file but excluding the ID i.e. Settlement Day, Settlement Period, ID, Cost, Volume and SO-Flag
8. The BMRA (having been warned to expect the email in step 2) pick up the email and manually enter the provided BSAD actions into the BMRS system (using data entry screens). They will have about [35 minutes] to do this i.e. the window from 15 minutes into the Settlement Period to 20 minutes after it ends. As part of this process the BMRA would allocate the next available ID numbers e.g. if the BSAD file (from step 3) uses IDs 1-16, and the email (from step 4) includes two DSBR actions, the BMRA would allocate them IDs 17 and 18. The BMRA would email the Transmission Company to confirm the allocated IDs.
9. On D+1, the DSBR actions should be included in the DISBSAD file sent to the BMRA by the Transmission Company (as currently). Note that the DSBR actions must be included with the same IDs provided by the BMRA in step 5 (because Party systems may rely on the fact that the IDs stay the same from one file to the next).

The Workgroup noted that the solution requires the BSC Agent to place an experienced and technical expert on standby during the relevant time periods.

The Workgroup noted this solution was bore a greater cost than the proposed solution. A breakdown of the indicative cost is provided in the table below:

Indicative Costs	
Particulars	Cost in £k
Implement P333 changes	84
Integration Testing and UAT	15
Governance and Analysis	30
Risk Margin	19
BSC Agent estimated charges	~90
Total cost	238

An enduring solution

The intention of P333 is to provide a temporary solution until the DSBR provisions are removed from the C16 statements. The Workgroup acknowledged the appetite for an enduring solution that could be developed in conjunction with the manual work around.

The Workgroup noted that should DSBR continue beyond the winter 2016/17 period, an enduring solution would be necessary, as in practice the BMRA deliver the BSC requirements for calculating and publishing imbalance prices by using automated processes. Ideally any change to the calculation of imbalance prices should be incorporated with the existing systems and processes. This ensures integrity and simplicity.

Housekeeping Changes

The Workgroup noted that following the introduction of the Capacity Market, with the removal of SBR and DSBR from the C16 Methodology, a housekeeping change would be raised to remove the references made to the DSBR.

7 Workgroup's Initial Conclusions



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

The majority of the Workgroup agreed that P333 would overall better facilitate the Applicable BSC Objectives compared with the existing baseline.

Due to the uncertainties of DSBR use beyond the winter 2016/17, a lack of an automated solution that could be implemented in time for the start of winter 2016/17 and the risk associated with the manual work around, one Workgroup member didn't believe that the Applicable BSC Objectives were demonstrated. They therefore did not think that P333 should be approved.

The following table contains the Workgroup's final views against each of the Applicable BSC Objectives.

Does P333 better facilitate the Applicable BSC Objectives?		
Obj	Proposer's Views	Other Workgroup Members' Views ¹
(a)	<ul style="list-style-type: none"> Neutral – No Impact. 	<ul style="list-style-type: none"> Neutral (unanimous) – as Proposer.
(b)	<ul style="list-style-type: none"> Yes – as including DSBR in the cash-out price calculation ensures that correct market signals are being sent. 	<ul style="list-style-type: none"> No (majority) – as there is a question of whether the number of risks associated with the implementation of the manual work around, outweigh the benefits. Neutral (minority – two) – as there a number of risks associated with the implementation of the manual work around.
(c)	<ul style="list-style-type: none"> Yes – as the solution ensures that the whole market would have access to the same information. 	<ul style="list-style-type: none"> Yes (majority) – As Proposer. Neutral (minority – one) - as there a number of risks associated with the provision of information.
(d)	<ul style="list-style-type: none"> Yes – as the solution ensures the provision of timely information, this reducing the incident of cash-out price changes. 	<ul style="list-style-type: none"> Yes (majority) – as Proposer. Neutral (minority – three) – as the manual work around would be more complication to administer.
(e)	<ul style="list-style-type: none"> Neutral – No Impact. 	<ul style="list-style-type: none"> Neutral (unanimous) – as Proposer.
(f)	<ul style="list-style-type: none"> Neutral – No Impact. 	<ul style="list-style-type: none"> Neutral (unanimous) – as Proposer.

Assessment Consultation Question

Do you agree with the Workgroup's initial unanimous view that P333 does better facilitate the Applicable BSC Objectives than the current baseline?

Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P333 which would better facilitate the Applicable BSC Objectives?

The Workgroup invites you to give your views using the response form in Attachment B

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¹ Shows the different views expressed by the other Workgroup members – not all members necessarily agree with all of these views.

Workgroup's Terms of Reference

Specific areas set by the BSC Panel in the P333 Terms of Reference

Is a BSC Modification the best way to achieve the aim of P333?

What is the impact of implementing P333?

What is the benefit of P333?

What changes are needed to BSC documents, systems and processes to support P333 and what are the related costs and lead times?

Are there any Alternative Modifications?

Does P333 better facilitate the Applicable BSC Objectives than the current baseline?

Assessment Procedure timetable

P333 Assessment Timetable

Event	Date
Panel submits P333 to Assessment Procedure	11 Feb 2016
Workgroup Meeting 1	23 Mar 16
Workgroup Meeting 2	18 Apr 16
Assessment Procedure Consultation	29 Apr – 23 May 16
Workgroup Meeting 3	25 May 16/ 26 May 16
Panel considers Workgroup's Assessment Report	9 Jun 16

Workgroup membership and attendance

P333 Workgroup Attendance			
Name	Organisation	23 Mar 16	18 Apr 16
Members			
Simon Fox-Mella	ELEXON (<i>Chair</i>)	✓	✓
Jemma Williams	ELEXON (<i>Lead Analyst</i>)	✓	✓
Libby Glazebrook	ENGIE (<i>Proposer</i>)	✓	✓
Lisa Waters	Waters Wye Associates	✓	✓
James Anderson	Scottish Power	✓	✓
Bill Read	RWE	✓	✓
Jonathan Davison	Cornwall Energy	☎	✓
Andy Colley	SSE	✓	✓
Alex Haffner	National Grid	✓	✓
Attendees			
John Lucas	ELEXON (<i>Design Authority</i>)	✓	✓
Geoff Norman	ELEXON (<i>Lead Lawyer</i>)	✗	✓
Emma Burns	ELEXON (<i>Market Analysis</i>)	✓	✓
Jonathan Whiting	Ofgem	✓	✓
Tony Bowes	National Grid	✓	✓
Rituraj Saikia	National Grid	✓	✗
Tariq Hakeem	National Grid	✓	✓
John Mansi	National Grid	✗	✓
Ajilesh Thayath	National Grid	✗	✓

Appendix 2: Glossary & References

Acronyms

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

Acronym	
Acronym	Definition
BM	Balancing Mechanism
BMRA	Balancing Mechanism Reporting Agent
BSAA	Balancing Service Adjustment Action
BSAD	Balancing Service Adjustment Data
BSC	Balancing and Settlement Code
DECC	Department for Energy and Climate Change
DISBSAD	Disaggregated Balancing Services Adjustment Data
DSBR	Demand Side Balancing Reserve
NIV	Net Imbalance Volume
SAA	Settlement Administration Agent
VoLL	Value of Lost Load

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	Issue 56 'Treatment of the new SBR and DSBR services in the imbalance price' page of ELEXON website	https://www.elexon.co.uk/smg-issue/issue-56/
4	Transmission Licence C16 Statements page of the National Grid website	http://www2.nationalgrid.com/uk/industry-information/electricity-codes/balancing-framework/transmission-license-c16-statements/
2	Modification P333 'Inclusion of DSBR volumes into the cash-out price in time for publication after the end of the Settlement Period'	https://www.elexon.co.uk/mod-proposal/p333/
2	Modification P335 'Inclusion of Non-BM STOR costs and volumes in the indicative cash-out price'	https://www.elexon.co.uk/mod-proposal/p335/

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External Links		
Page(s)	Description	URL
4	Modification P323 'Enabling inclusion and treatment of SBR in the Imbalance Price' page of ELEXON website	https://www.elexon.co.uk/mod-proposal/p323/
4	Modification P305 'Electricity Balancing Significant Code Review Developments' page of ELEXON website	https://www.elexon.co.uk/mod-proposal/p305/