

BSC Modification Proposal Form		At what stage is this document in the process?
<h1>P364</h1> <h2>Clarifying requirements for registering and maintaining BM Units</h2>		<div style="display: flex; flex-direction: column; align-items: flex-start;"> <div style="border: 1px solid green; background-color: #2e8b57; color: white; padding: 2px; margin-bottom: 2px;">01 Modification</div> <div style="border: 1px solid blue; padding: 2px; margin-bottom: 2px;">02 Workgroup Report</div> <div style="border: 1px solid purple; padding: 2px; margin-bottom: 2px;">03 Draft Modification Report</div> <div style="border: 1px solid orange; padding: 2px;">04 Final Modification Report</div> </div>
<p><b>Purpose of Modification:</b></p> <p>The purpose of this Modification is to progress the following recommendations ELEXON's Review of Metering Dispensations and non-standard Balancing Mechanism (BM) Units:</p> <ul style="list-style-type: none"> <li>To allow the same Party to register separate BM Units for the Imports and Exports related to the same Plant and Apparatus as standard BM Units; and</li> <li>Make changes to the BSC to require Parties to (re-)apply for non-standard BM Unit configurations when the configuration of Plant and Apparatus at a site changes and no longer satisfies the criteria for a standard BM Unit or an approved non-standard configuration.</li> </ul> <p>In addition, this Modification suggests changes to the requirement for non-standard BM Units solely due to there being more than one BSC Party registering BM Units at a CVA Boundary Point.</p>		
	<p>The Proposer recommends that this Modification should:</p> <ul style="list-style-type: none"> <li>be assessed by a Workgroup and submitted into the Assessment Procedure</li> </ul> <p>This Modification will be presented by the Proposer to the BSC Panel on <b>14 December 2017</b> The Panel will consider the Proposer's recommendation and determine how best to progress the Modification.</p>	
	<p>High Impact:</p>	
	<p>Medium Impact:</p> <p>Balance and Settlement Code (BSC) Parties, ELEXON, Imbalance Settlement Group (ISG), Central Registration Agent (CRA)</p>	
	<p>Low Impact:</p> <p>Transmission Company;</p>	

Contents		 Any questions?
<b>1 Summary</b>	<b>3</b>	Contact: Chris Wood
<b>2 Governance</b>	<b>5</b>	 <a href="mailto:chris.wood@elexon.co.uk">chris.wood@elexon.co.uk</a>
<b>3 Why Change?</b>	<b>6</b>	 020 7380 4142
<b>4 Code Specific Matters</b>	<b>12</b>	Proposer: Graz MacDonald, Green Frog Power
<b>5 Solution</b>	<b>13</b>	 <a href="mailto:graz@greenfrogpower.co.uk">graz@greenfrogpower.co.uk</a>
<b>6 Impacts &amp; Other Considerations</b>	<b>13</b>	 020 3876 5180
<b>7 Relevant Objectives</b>	<b>15</b>	Proposer's representative: [Insert name]
<b>8 Implementation Approach</b>	<b>16</b>	 [Insert email]
<b>9 Legal Text</b>	<b>16</b>	 [Insert number]
<b>10 Recommendations</b>	<b>16</b>	Other: [Insert name]
<b>Timetable</b>		 [Insert email]
<i>Please provide Proposer and Proposer Representative contacts and an indicative timetable. The BSC Change Analyst will update the contents and provide any additional Specific Code Contacts. The BSC Change Analyst can provide specific dates based on your Implementation Approach in Section 8.</i>		 [Insert number]
<b>The Proposer recommends the following timetable: (amend as appropriate)</b>		Other: [Insert name]
Initial consideration by Workgroup	6 Feb 2018 or 8 Feb 2018	 [Insert email]
Assessment Procedure Consultation	29 May 2018 – 18 June 2018	 [Insert number]
Workgroup Report presented to Panel	9 Aug 2018	
Report Phase Consultation	15 Aug 2018 – 29 Aug 2018	
Draft Modification Report presented to Panel	13 Sep 2018	
Final Modification Report published	19 Sep 2018	

# 1 Summary

## Background

The Balancing and Settlement Code (BSC) requires the configuration of Plant and Apparatus in a single BM Unit to meet certain conditions and defines a number of configurations of Plant and Apparatus that it considers to meet these conditions, e.g. Generating Unit, Power Park Module (PPM). Plant and Apparatus within a BM Unit that meet one of the configurations set out in the BSC are referred to as standard BM Units. Plant and Apparatus that do not meet one of the standard BM Unit configurations have to be approved on a case by case basis by the Imbalance Settlement Group (ISG) under delegation from the Panel.

## What is the issue?

We believe that the requirements in BSC Section K3.1 require review to ensure they remain fit for purpose. In particular, we are concerned that the current requirements frustrate and potentially inhibit certain forms of participation. Our belief builds on the findings and recommendations of ELEXON's 'Review of Metering Dispensations and non-standard BMUs' and changes in market participation over the last 24 months.

To illustrate our concerns we have summarised three scenarios:

Scenario 1 – BSC Section K3.1.3 requires Import and Export to and from the same Plant and Apparatus to be comprised in the same BM Unit unless the Parties responsible for the Imports and Exports are different. This causes issues for Parties who, for commercial reasons, wish the Imports and Exports to be allocated to separate BM Units, which the BSC does not allow. An example of such arrangement is where the Registrant supplies the import to the Plant and Apparatus, but has a Power Purchase Agreement (PPA) in place for the Export.

Scenario 2 - Plant and Apparatus which is of a standard configuration, but where different Parties are responsible for Import and Export are considered to be non-standard BM Units, regardless of their configuration.

Scenario 3 - BSC Section K3.1.5(d) requires Where there is more than one Party registering Plant and Apparatus at a single CVA Boundary Point, e.g. there is more than one set of Plant and Apparatus, this is also considered to be non-Standard, even if the Plant and Apparatus would otherwise be considered as a standard configuration.

These three scenarios are described in more detail in section 3 'Why change?' below.

In addition we believe the BSC should more clearly explain what should be done when Plant and Apparatus is reconfigured in such a way that the new configuration no longer meets one of the standard configurations or the original approved non-standard configuration for that site. In this scenario, it is essential that Parties check that the configuration of their BM Units is approved and if not apply for a new non-standard BM Unit to ensure they are meeting the requirements of Section K.

## What is the proposed solution?

Building on the findings and recommendations of ELEXON's 'Review of Metering Dispensations and non-standard BMUs', we have identified the following specific changes to Section K3. We also propose that a Modification Workgroup ensure that the overall requirements in Section K3.1 are reviewed to ensure they are fit for purpose in light of the scenarios we have illustrated below and the findings in ELEXON's review.

Parties will be able to register separate BM Units for the Import and Export related to the same Plant and Apparatus at the same Boundary Point. Separate BM Units for the Import and Export related to the same Plant and Apparatus will not be non-standard BM Units unless the configuration of the Plant and Apparatus is non-standard.

Wherever a Plant and Apparatus is configured in such a way that it would meet the requirements to be classed as a standard BM Unit, it should be registered as such, regardless of whether there are one or more Parties registering BM Units at a CVA Boundary Point.

Strengthen the requirements around reconfiguration of Plant and Apparatus to ensure that the reconfigured Plant and Apparatus continues to meet the requirements of the BSC either as a Standard BM Unit or an approved non-standard BM Unit.

## 2 Governance

### Justification for proposed progression

This Modification should be progressed as a self-governance Modification for the following reasons:

- i) It simplifies current arrangements which are already possible:
  - a. Parties can already apply for a non-standard BM Unit for more than one Party at a CVA Boundary Point to the ISG. ISG can already make this decisions on a case by case basis.
  - b. Parties that wish to register separate BM Units for their Import and Export can currently register their Imports in SVA and their Exports in CVA instead
  - c. There is already a requirement for Parties to keep their registration details up to date, this Modification looks to make the requirement around re-configuration more explicit;
- ii) The configuration of the BM Unit does not have a direct impact on consumers;
- iii) Competition in generation is not materially affected because this Modification simplifies the current arrangements for all Generators;
- iv) There is no effect on operation of the Transmission System because this Modification simplifies the current arrangements relating to the registration of BM Units;
- v) There is no effect on matters relating to sustainable development, safety or security of supply, the management of the market or network emergencies because this Modification simplifies the current arrangements and applies equally to all Generators and
- vi) The proposals will not affect how the BSC is governed or Modifications are progressed in anyway.
- vii) The proposals apply equally to all Parties and so there is no discrimination.

### Requested Next Steps

This Modification should be:

- Assessed by a Workgroup and submitted into the Assessment Procedure.

Whilst the proposal in itself is relatively straight forward, all of the implications and the nuances of the solution need to be fully assessed to ensure that the final proposed solution and Legal Text meets the needs of industry as much as possible.

Another modification is being proposed to assess whether certain types of BM Unit configurations should be classified as standard BM Units. Given the overlap between the two, consideration may want to be given to progressing the two concurrently.

## 3 Why Change?

### Background

#### What is a BM Unit?

Balancing Mechanism (BM) Units are used as units of trade within the Balancing Mechanism. Each BM Unit accounts for a collection of Plant and/or Apparatus, and is considered the smallest grouping that can be independently controlled. As a result, most BM Units contain either a Generating Unit or a collection of consumption meters. Any energy produced or consumed by the contents of a BM Unit is accredited to that BM Unit.

#### Types of BM Unit

There are several types of BM Unit, each covering different aspects of the system. Each is marked with a particular prefix to its ID, as shown below:

BM Unit	Prefix	Description
Directly Connected	T_	These BM Units are directly connected to the Transmission System.
Embedded	E_	These BM Units are embedded into a Distribution System.
Interconnector	I_	These BM Units are related to an Interconnector.
Supplier	2_	These BM Units cover Supply, and contain all of a particular Supplier's MPANs in either a Base or Additional Supplier BM Unit for a given Grid Supply Point (GSP) Group.
Supplier	C_	These Additional Supplier BM Units are registered solely for the purpose of allocating CFD Assets to them.
Miscellaneous	M_	Other types of BM Units that don't fit the above categories. This prefix does not apply to newly registered BM Units.

This Modification relates to Directly Connected and Embedded BM Units. These are BM Units for Plant and Apparatus Associated with Metering Systems Registered with the CRA.

#### Standard Configuration

A BM Unit is of a standard configuration if it meets one of the configurations set out in the BSC, Section K3.1.4. These include

- any Generating Unit, Combined Cycle Gas Turbine (CCGT) Module or PPM whose Metering System(s) for its Exports is registered in CMRS;
- the Plant and Apparatus which comprises part of, and which Imports electricity through the station transformer(s) of, a Generating Plant, where the Metering System(s) for such Imports is registered in CMRS;
- the premises of a Customer supplied by the Party which is directly connected to the Transmission System (provided that the premises are only connected at one Boundary Point);
- any two or more Offshore PPMs where the Party wishes to combine these as a single BM Unit and the Transmission Company determines that such a configuration is suitable to constitute a single Combined Offshore BM Unit.

The configurations set out in K3.1.4 are deemed to meet the requirements that a BM unit should satisfy which are set out in BSC Section K3.1.2:

- (a) only one Party is responsible for the Exports and/or Imports;
- (b) the Exports and/or Imports of electricity from and to the Plant and/or Apparatus comprised in the BM Unit are capable of being controlled independently of the Exports or Imports of electricity from or to any Plant or Apparatus which is not comprised in the BM Unit;
- (c) the Metered Volumes from the BM Unit's Plant and Apparatus are submitted separately from any Plant and Apparatus not part of the BM Unit;
- (d) the BM Unit's Imports and Exports are not measured by both CVA and SVA Metering Systems; and
- (e) there are no smaller aggregations of the BM Unit's Plant and Apparatus satisfying (a), (b) and (c).

BM Unit are registered in accordance with BSCP15 'BM Unit Registration'. Standard BM Units take at least 30 Working Days (WDs) to register. ELEXON reviews the BM Unit configuration and if it agrees that it is standard, there is no ISG involvement in the registration process.

### **Non-Standard Configurations**

In certain circumstances listed in BSC Sections K3.1.5 and K3.1.6 the responsible Party may apply to the BSC Panel to determine a configuration that does or most nearly achieves the requirements for a BM Unit. Where the Panel determines such a configuration, it is known as a non-standard BM Unit. The Panel has delegated responsibility for considering such applications to the ISG. In practice Parties send an application for a non-standard BM Unit to ELEXON. ELEXON then presents the application on the applicant's behalf to the ISG for determination.

Non-standard BM Units take 60WDs to register to take into account ISG meeting schedules. Where a Party applies for a non-standard BM Unit, the Party has to provide a letter to the ISG

The circumstances in which a Party<sup>1</sup> may apply for a non-standard BM Unit are:

- where the relevant Plant and Apparatus does not fall into one of the standard configurations;
- where the relevant Plant and Apparatus do fall into a standard configuration, but the Party considers a different configuration would satisfy the requirements for BM Units; or
- where the relevant Plant and Apparatus Exports or Imports at a CVA Boundary Point at which there are other Exports or Imports for which another person is responsible.

Where a non-standard BMU is applied for, the Party has to draft a letter explaining the configuration of the relevant Plant and Apparatus, requesting that the Plant and Apparatus is considered to be a non-standard BMU. ELEXON then has to draft an ISG paper based on the information provided and the views of the Transmission Company and the ISG has to consider and determine whether the BMU should be as requested. Where a site is of a standard configuration, the applicant simply applies to ELEXON to register the BMU and is not required to justify its application or receive the ISG's approval.

Applications for a non-standard BMU have a lead time of 60WDs to take into account the time to draft papers and the ISG timetable.

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<sup>1</sup> The Code also allows the Central Data Collection Agent or Central Register Agreement to refer the question of the configuration of the BM Unit to the ISG where it considers that there is reasonable doubt as to whether the relevant Plant and Apparatus falls into one of the standard configurations.

## What is the issue?

BSC Section K3.2.1 requires that BSC Parties register BM Units comprising the Plant and Apparatus for whose Exports and/or Imports they are responsible. BSC Section K3.1 sets out requirements that determine the configuration of BM Units. Taking account of ELEXON's review of Metering Dispensations and non-standard BMUs, we believe that the requirements of Section K3.1 may not best reflect the current and changing ways in which parties participate in the electricity industry. Below, we have summarised three scenarios that highlight how existing requirements frustrate or even inhibit participation. These are:

1. Generating Unit to be registered by two BSC Parties – one for import and one for export;
2. Generating Unit to be registered by a single BSC Party responsible for both import and export as Two BM Units; and
3. Generating Units sharing a Single Boundary Point.

In summary, we believe these scenarios demonstrate that the requirements of K3.1, and in particular K3.1.2 and K3.1.3, require review to ensure they remain fit for purpose and flexible to the changes in market participation.

In addition to ensuring it is clear how Parties register BM Units in the first place, we believe the requirement governing changes to BM Unit Registration Details (in K3.2.8 and BSCP15) ought to be reviewed and clarified. That is, the initial configuration and registration of Plant and Apparatus that constitute a BM Unit must satisfy the requirements of K3.1. Any change to the configuration of the Plant and Apparatus registered in a BM Unit, for example the installation of new Plant and Apparatus or disconnection of old Plant and Apparatus, may mean that the BM Unit no longer complies with requirements it was originally registered against.

Such changes may change the BM Unit Configuration (a BM Unit Registration Detail required on form BSCP15/4.1, i.e. whether the BM Unit is a non-standard or if a standard, which type). According to K3.2.8 the Registrant must keep its Registration Details up to date. However, in practice Registrants rarely notify ELEXON of changes to BM Unit Configuration. Instead ELEXON is more likely to receive updates to BM Units' Generation Capacity (GC) (and Demand Capacity (DC)) which may be a consequence of a change in configuration.

We believe the BSC and/or BSCP15 should more clearly explain what Parties must do if the configuration of Plant and Apparatus no longer satisfies the requirements under which the BM Unit was last registered.

The remainder of this section contains more detailed explanations of the scenarios that illustrate how the BSC currently may restrict certain behaviour.

### **Scenarios illustrating need for change**

#### Key to Diagrams

The following sections use a number of diagrams to help to explain the issues. The symbols used are as follows:

TS / DS Transmission System / Distribution System

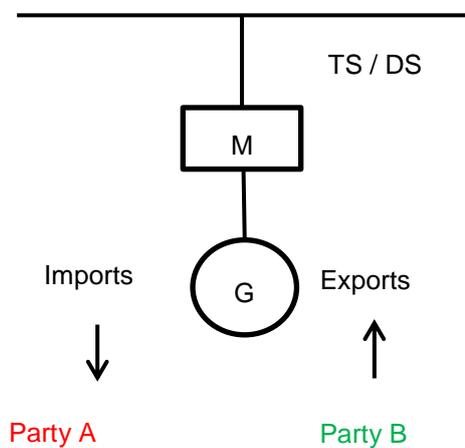


A Generating Unit has been used to illustrate the points, but this could also be a CCGT Module or a Power Park Module

### Scenario 1: Generating Unit to be registered by two BSC Parties – one for import and one for export

Diagram 2 shows that there are two different Parties responsible for the Imports and the Exports associated with the Generating Unit Plant and Apparatus.

**Diagram 2: One Generating Unit BM Unit, Two Parties**



K3.1.3 of the BSC allows two separate BM Units to be registered and K3.1.2(a) requires that there is a single BSC Party responsible for the Imports and/or Exports in each BM Unit.

*'K3.1.2 - Subject to paragraphs 3.1.4 and 3.1.6(d), a BM Unit must satisfy the following conditions:*

- (a) only one Party is responsible for the Exports and/or Imports from or to the Plant and/or Apparatus which is comprised in the BM Unit.'*

*'K3.1.3 - Subject to paragraphs 3.1.4B and 3.1.4C [PPMs belonging to Switching Groups], the same Plant and Apparatus may be comprised in more than one BM Unit only to the extent that different persons are responsible for the Exports from and the Imports to such Plant and Apparatus.'*

The configuration of the Plant and Apparatus would satisfy the Export and Import standard BM Units under K3.1.4(a)

*'K3.1.4 - Subject to paragraph 3.1.6 each of the following shall be a single BM Unit, and (except where paragraph 3.1.5 applies) shall be deemed to satisfy the requirements in paragraph 3.1.2:*

- (a) any Generating Unit, CCGT Module or Power Park Module for whose Exports the Metering System(s) is or are registered in CMRS;*

However, Section K3.1.5(d) states:

'K3.1.5 -Paragraph 3.1.6 applies in any case where (pursuant to this Section K) one or more BM Units are required to be established, comprising particular Plant and / or Apparatus (the "relevant" Plant and Apparatus), if:

...

- (d) (except in the case of an Interconnector) the relevant Plant and Apparatus Exports or Imports at a CVA Boundary Point at which there are other Exports or Imports for which another person is responsible (whether or not the relevant Plant and Apparatus falls into a category listed in paragraph 3.1.4).'

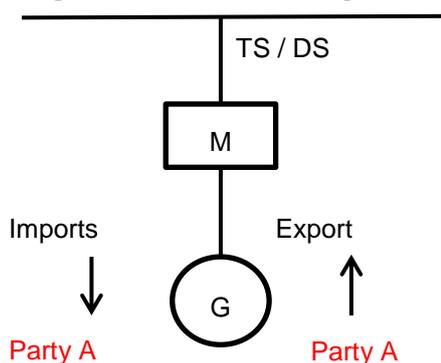
In this scenario, the BSC suggests that if separate Parties are registering the Imports and Exports relating to the same Plant and Apparatus at the same CVA Boundary Point that this has to be registered as a non-standard BM Unit, despite the configuration of the individual BM Units being of a standard category. This means that Panel approval (via the ISG) would be required before the BM Units can be registered.

### Scenario 2: Generating Unit to be registered by a single BSC Party responsible for both import and export as Two BM Units

Most new Generator BSC Parties register one BM Unit for both the Imports and Exports relating to the Generating Unit, in line with BSC Section K3.1.4(a).

This is shown in the following diagram 3:

**Diagram 3: One Generating BM Unit, One Party**



Where Imports and Exports are registered by the same Party (Party A) as a single BM Unit, they are typically registered as a standard generating BM Unit under K3.1.4(a). However, there may be business reasons as to why a single Party may wish to allocate Import and Export separately as two separate BM Units. Section K3.1.3 prevents a single Party from applying for separate BM Units for the Import and Export associated with their Plant and Apparatus.

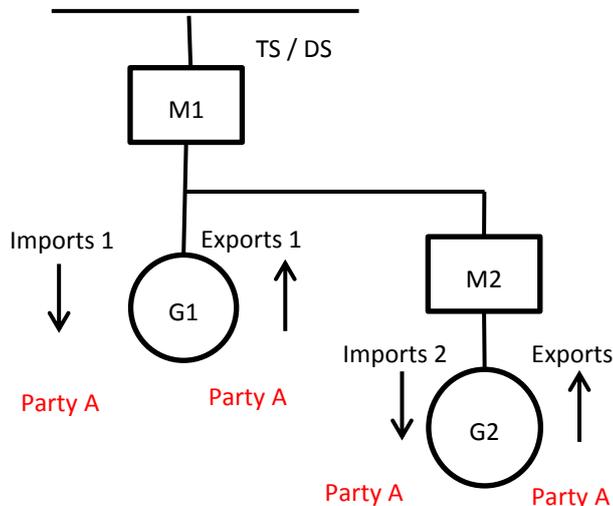
Currently ELEXON has to advise participants that they cannot set up separate BM Units for Imports and Exports relating to the same Plant and Apparatus where the Registrant is the same for both the Imports and Exports which means that Parties may not be able to trade in the way that they wish.

### Scenario 3: Generating Units sharing a Single Boundary Point

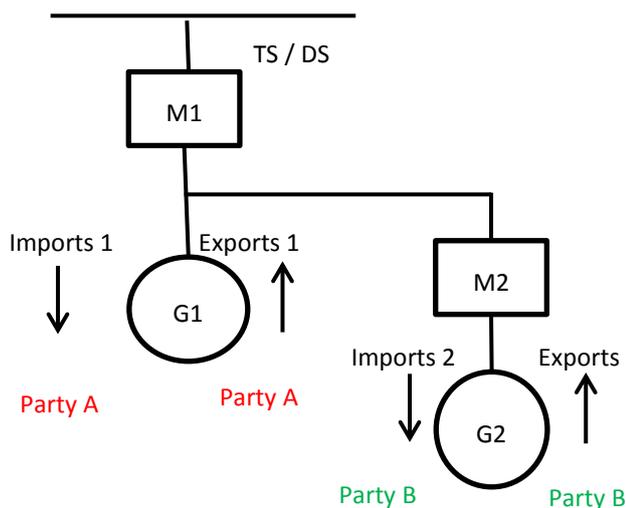
According to BSC K3.1.5(d) (as set out above), where two Generating Units that in their own right would be classed as standard BM Units are connected at the same CVA Boundary Point and the Registrant for each is a different Party, then one or more non-standard BM Units would need to be applied for. If both BM Units are registered at the same time both shall be considered as a non-standard BM Unit and if registered sequentially, the second BM Unit registration shall be considered as a non-standard BM Unit. This means that they/it will require approval from the ISG before being registered.

Conversely the same Plant and Apparatus could be registered as two standard BM Units if the same Party was responsible for the two Generating Units. This is shown in the following diagrams:

**Diagram 4: Two Generating Units, One Party, One CVA Boundary Point**



**Diagram 5 Two Generating Units, Two Parties, One CVA Boundary Point**



Diagrams 4 and 5 show a site containing two Generating Units. The metering for both Generating Units is registered in the Central Meter Registration Service (CMRS). Therefore there is a single CVA Boundary Point connection to the Transmission / Distribution System and the energy associated with Generating Unit 2 goes through the Meter for Generating Unit 1. This means that to work out the energy associated with Generating Unit 1, you would need to subtract the net energy recorded in M2 from the net energy recorded in M1.

Each Generating Unit satisfies the standard BM Unit configuration in K3.1.4(a), so two BM Units would be registered: one for Generating Unit 1 and one for Generating Unit 2.

In Diagram 4, where a single Party, Party A, registers both BM Units, and as they are of a standard configuration of one BM Unit for each Generating Unit, these would be a standard BM Unit applications.

Where Party A registers Generating Unit 1 and Party B registers Generating Unit 2 (diagram 5), Generating Unit 2 would be a non-standard BM Unit due to more than one Party being responsible for Imports and Exports through the same CVA Boundary Point despite the configuration being standard of one BM Unit per Generating Unit. The assumption is that Generating Unit 2 is registered after Generating

Unit 1, which means at the time of registration of Generating Unit 1, it is of a standard configuration and the only connection at the CVA Boundary Point.

In some cases, Generating Unit 2 is installed and registered at some time after Generating Unit 1. Because the metering for Generating Unit 2 is below the metering for Generating Unit 1 this means that as part of the registration of Generating Unit 2 (and its associated BM Unit), the Aggregation Rules for the BM Unit relating to the existing Generating Unit 1 also have to be updated to difference off the meter readings for Generating Unit 2. The Registrant of Generating Unit 2 would need to apply for a Metering Dispensation due to the metering not being at the Defined Metering Point (i.e. at the Boundary Point). As part of the Metering Dispensation process the Registrant of Generator 1 would be identified as an 'Affected party' and will be consulted on the Metering Dispensation application. This would indicate to them that they would need to implement differencing in their Aggregation Rule. ELEXON would not give the approval to energise the new BM Unit for Generating Unit 2 until amended Aggregation Rules for Generating Unit 1 had been received and verified<sup>2</sup>.

The ISG has recently considered such an application in paper [ISG198/01](#).

This scenario highlights how the requirements in Section K3.1.3, K3.1.4 and K3.1.5(d) appear to limit participation and are confusing to interpret, The confusing nature of the requirement in K3.1.5(d) is further highlighted where Party A in Diagram 4 transferred responsibility for Generating Unit 2 to another BSC Party, Party B, meaning that there were now two Parties responsible for Imports and Exports from different Plant and Apparatus at the same CVA Boundary Point. In this case there is no requirement for the new Registrant of Generating Unit 2 to apply for a non-standard BM Unit since Generating Unit 2 would be an existing standard BM Unit.

## 4 Code Specific Matters

### Technical Skillsets

Knowledge of the BM Unit application process and in particular non-standard BM Units.

Operation of the Transmission System

Operation of Distribution System

### Reference Documents

[BSC Panel paper 264/08 'Review of Metering Dispensations and Non-Standard BM Units – Final Report'](#)

[ISG 198/01 Pen y Cymoedd Battery Modules non-standard BM Unit Application](#)

[ISG 198 Approved Minutes](#)

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<sup>2</sup> Note that there is an additional complication where the generating units in diagram 4 are set up as three or four BM Units with separate BM Units relating to the Imports and exports. In this scenario the Aggregation Rules associated Generating Unit 1 this can force positive values into a Parties Consumption Account and / or negative values into a Parties Production Account. This is not incorrect but unusual and Parties intending to register BM Units of this configuration need to confirm that this will not cause system issues.

## 5 Solution

### Proposed Solution

We propose the following specific changes to the BSC:

- Amend BSC Section K so that non-standard BM Units do not have to be applied for where the Plant and Apparatus is of a standard configuration but there is more than one Party responsible for the Imports and Exports.
- Amend BSC Section K so that a single BSC Party can register separate BM Units for the Imports and Exports related to the same Plant and Apparatus as a standard BM Unit.
- Amend BSC Section K so that non-standard BM Units do not have to be applied for where the Plant and Apparatus is of a standard configuration but there is more than one Party at a CVA Boundary Point.
- Amend BSCP15 so that the CDCA check and confirm that the Aggregation Rules of any associated BM Units have been updated where a new registration affects the Aggregation Rules.
- Amend BSC Section K to require Parties to consider if their BM Unit configuration has changed following changes to Plant and/or Apparatus and if required seek approval or re-approval for a non-standard BM Unit configuration from the ISG.
- Amend BSCP15 so that Parties consider whether they need to (re)apply for a non-standard BM Unit if configuration of Plant and/or Apparatus changes. If so the BSCP should direct them to section 3.1 'Registration of a BM Unit Associated with Metering Systems registered with the CRA'.
- Amend BSCP15 to add a process around the reconfiguration of BM Units.

## 6 Impacts & Other Considerations

### Impacts

This change Impacts:

- BSC Parties:
  - By simplifying the registration process for some non-standard BM Units by removing the need to submit a non-standard BM Unit application.
  - Parties will be able to register separate Import and Export BM Units to suit their trading requirements.
  - (Re)applying for a non-standard BM Unit if necessary will help to maintain the integrity of the Settlement process by ensuring that the configuration of BM Units is compliant with the BSC.
- ELEXON:
  - Reducing the number of non-standard BM Unit registrations received will allow ELEXON to focus on other areas of Settlement and provide increased customer service.
- ISG (it is assumed that this process would be delegated to the ISG who currently determine non-standard BM Unit applications):
  - Reducing the number of non-standard BM Unit registrations received will allow the ISG to focus on other areas of Settlement and provide increased customer service.
- Transmission Company:
  - By clarifying what are acceptable BM Unit configurations under the BSC. The Transmission Company would still review every BM Unit application.

The processes impacted are:

- BM Unit registration;
- BM Unit reconfiguration; and
- Seasonal and mid-season updates to GC and DC.

The documents impacted are:

- The BSC Section K and potentially Annex X-1; and
- BSCP15 BM Unit registration.

No systems are impacted by this change.

### **Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?**

At the time of submitting this proposal, the Authority is conducting two SCRs:

- [Market-wide Half Hourly Settlement](#); and
- [Targeted Charging Review](#)

It is not believed that this modification will impact the market-wide Half Hourly (HH) Settlement SCR as the changes proposed will only effect the CVA market.

It is not believed that this modification will impact the Targeted Charging Review SCR as this Modification does not change where and how the Plant and Apparatus is connected to the Total System.

It is not envisaged that P364 will impact other significant industry change projects, but this will be assessed during the Assessment Phase.

The Proposer requests that this Modification be exempt from the Significant Code Review process.

### **Consumer Impacts**

This Modification does not directly impact customers.

### **Environmental Impacts**

None identified

## 7 Relevant Objectives

### Impact of the Modification on the Relevant Objectives:

Relevant Objective	Identified impact
a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence	Neutral
(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System	Neutral
(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	Positive
(d) Promoting efficiency in the implementation of the balancing and settlement arrangements	Positive
(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]	Neutral
(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	Neutral
(g) Compliance with the Transmission Losses Principle	Neutral

### Rationale

#### Applicable BSC Objective (c):

Allowing separate Import and Export BM Units to be registered by the same Party would remove the inconsistency between how Import and Export BM Units can be registered depending on whether the same or different Parties are registering them, therefore levelling the playing field and promoting competition. Parties should be free to register separate Import and Export BM Units to give greater commercial options thus encouraging entry into the market place and facilitating competition.

#### Applicable BSC Objective (d):

Adding further information about (re-)applying for non-standard BM Unit status when a site is reconfigured helps to make the BSC requirements clearer and reduces the risk of errors occurring.

## 8 Implementation Approach

This change is a document only change. It should be implemented as part of the first standard BSC release following approval for implementation.

## 9 Legal Text

### Legal Text Commentary

The Proposer believes that appropriate legal text is best developed as part of the Assessment of this Modification. However, it is anticipated that changes will be required to the following BSC Sections and Code Subsidiary Documents:

- Section K 'Classification and Registration of Metering Systems and BM Units'
- Potentially Section X-1 'Definitions and Interpretation'
- BSCP15 'BM Unit Registration'
  - Section 3.1 Registration of BM Unit Associated with Metering Systems Registered with the CRA
  - Section 3.7 Registration of Seasonal Estimates of Maximum Positive Magnitude and Maximum Negative Magnitude BM Unit Metered Volume
  - Section 3.8 Mid-Season Changes of Generation Capacity and Demand Capacities
  - New section for the Reconfiguration of BM Unit Associated with Metering Systems Registered with the CRA
  - Form BSCP15/4.1 Registration of BM Units for a CVA Metering System

## 10 Recommendations

### Proposer's Recommendation to the BSC Panel

The BSC Panel is invited to:

- Agree that P364 be progressed as a Self-Governance Modification Proposal; and
- Agree that P364 be sent into the Assessment Procedure for assessment by a Workgroup.