
P463 – Digital Meeting Etiquette

- Welcome to the P463 Workgroup meeting 1 – we'll start shortly
- No video please to conserve bandwidth
- Please stay on mute unless you need to talk – use IM if you can't break through
- Talk – pause – talk
- Lots of us are working remotely – be mindful of background noise and connection speeds

ELEXION

P463 – ‘Introduce a Standard Change process’

Meeting 1

19 December 2023

Meeting Agenda

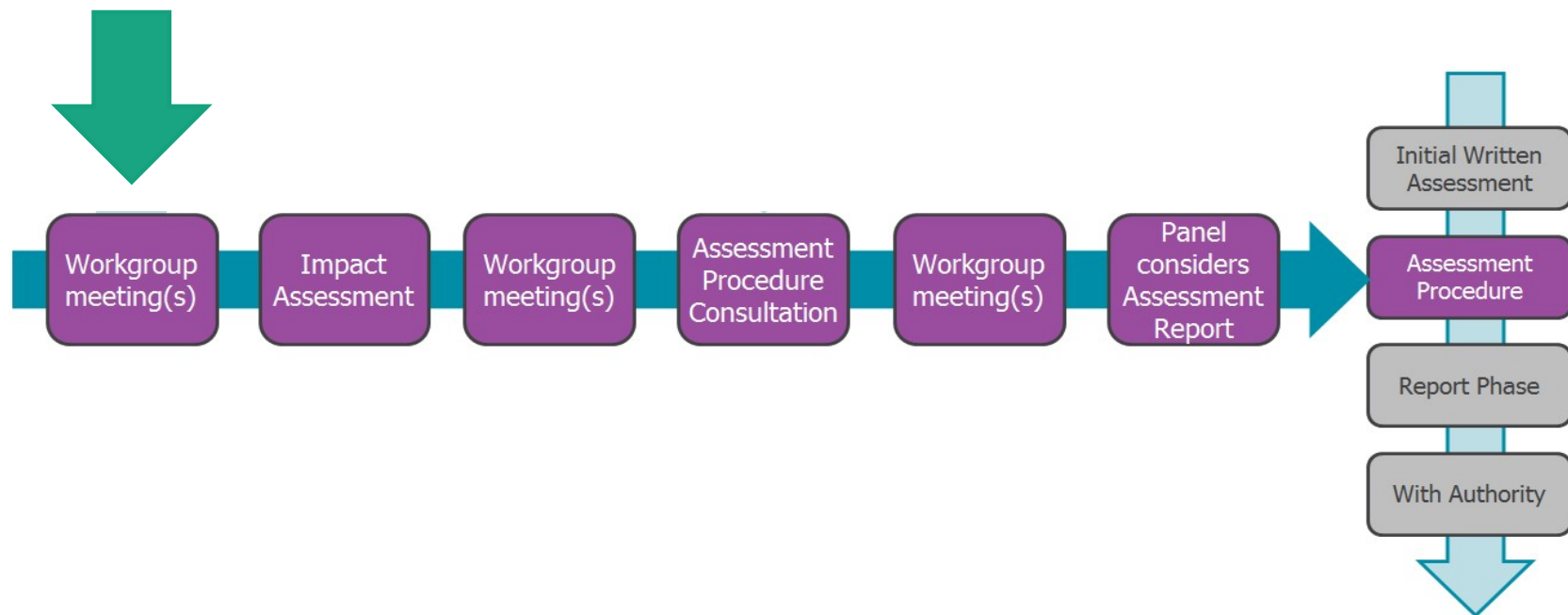
Objectives for this meeting:

- Consideration of P463:
 - Background and rationale
 - Proposed process and criteria
 - Proposed candidates for Standard Change
- Consideration of the P463 Terms of Reference (ToR); and
- Agree the change types to be taken forward for Legal drafting and consultation

Agenda Item	Lead
1. Welcome and meeting objectives	Lawrence Jones – Chair (Elexon)
2. P463 Summary and background	Lawrence Jones
3. Standard Change Framework	Lawrence Jones
4. P463 Proposed Change Types for Standard Change	Zaahir Ghanty, James Townsend (Elexon)
5. P463 Specific ToR questions	Workgroup
6. P463 Standard ToR questions	Workgroup
7. Next steps	Serena Tilbury (Lead Analyst)
8. Meeting close	Lawrence Jones

Where are we in the Assessment process?

- The role of the Workgroup is to assist the Proposer in developing the most appropriate solution, answer the Terms of Reference set by the BSC Panel and consider the costs and impacts of making the change
- For P463 the Proposer shall not have the right to vary their Modification Proposal pursuant to paragraph Section F 2.1.12(b). I.e., as the Proposer is the BSC Panel and the representative is Zaahir (Elexon), the Workgroup will own the solution via a majority decision





P463 PROPOSAL SUMMARY

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Issue

- All changes to the BSC and BSC Configurable Items must currently go through the Change Process, either as a Modification (Mod), or as a Change Process (CP)
- In some instances, these processes may be overly bureaucratic and burdensome for impacted stakeholders, especially where certain changes have become routine and low risk
 - Some of these changes are updates to industry data items whereby the inputs and process remain the same and thus is a repeatable activity that gives an output in the same format, using the same methodology
 - The necessity of formal committee sign-off for these changes means that they use valuable agenda real-estate while offering little value, and comes at the cost of time that could be spent discussing and agreeing other industry issues
- Furthermore, many changes to BSC standing data require public consultation and Committee approval, which may not always be proportionate or necessary

Solution

Desired Outcomes

- Introduce a simplified change process for certain types of changes that meet pre-defined criteria – a Standard Change Process
 - Allow certain low risk, repeatable and predictable changes to be implemented without following the existing Change Process or Modification procedures
- Reduce the burden on industry and Elexon for progressing these types of changes
- Identify which types of changes could follow the Standard Change process, and which of these, if any, should be included within this Modification Proposal (i.e. any enabling changes needed for a change to follow the Standard Change process)
 - Fuel Types
 - MDD
 - What else?

Proposed Changes

- [BSC Section F 'Modification Procedures'](#) should be updated to recognise the Standard Change process, as being detailed in BSCP40
- [BSCP40](#) should be updated to define two new processes:
 - A process to establish specific types of changes as a Standard Change; and
 - A Standard Change process
- The solution should include any types of changes that should become a Standard Change, so that any enabling changes can also be made

Views against the Applicable BSC Objectives

Objective (d)

P463 will allow certain changes to be progressed more efficiently, reducing the burden for industry and Elexon

Applicable BSC Objectives

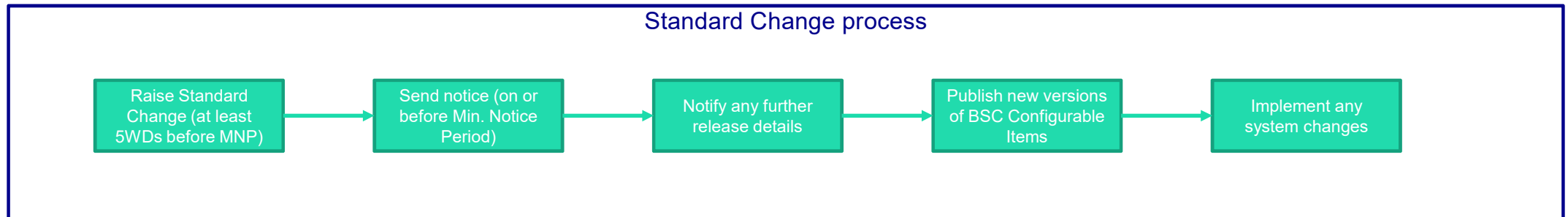
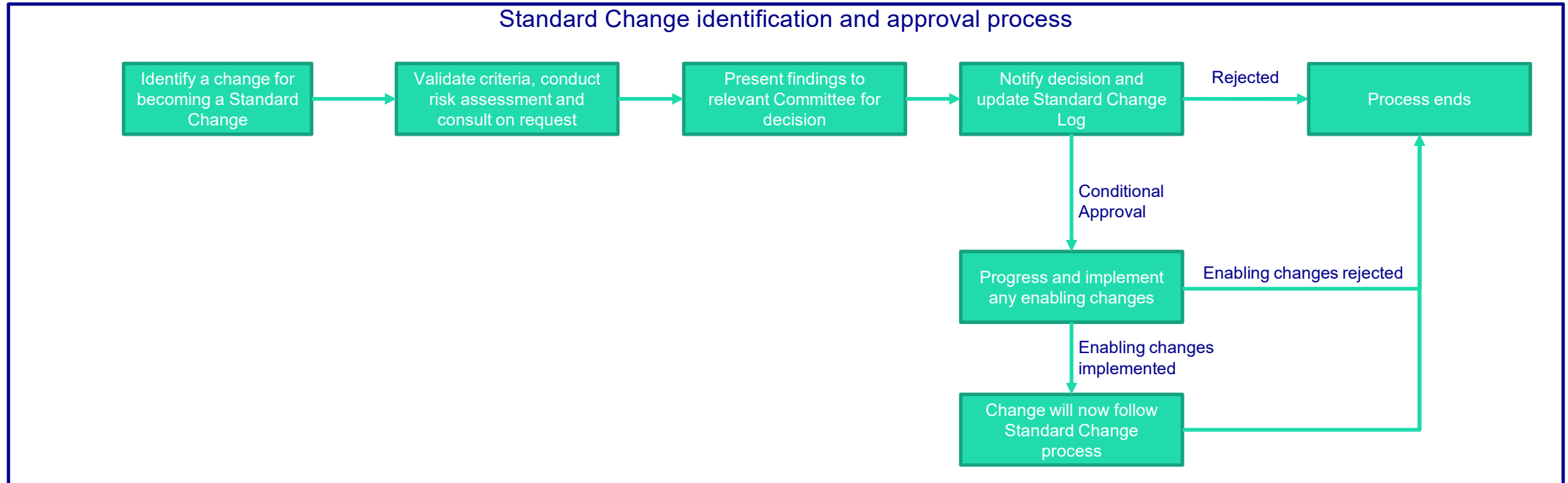
- a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence
- b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System
- c) Promoting effective competition in the generation and supply of electricity 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
- g) Compliance with the Transmission Losses Principle



DRAFT STANDARD CHANGE FRAMEWORK

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High-level process



Proposed criteria

Draft Criteria

Low risk - A change is considered low risk when it has a minimal or negligible chance of causing adverse effects to the IT environment or the business processes it supports. This means that the change has been tested thoroughly, has been implemented multiple times in the past without significant issues, or is well understood by the teams implementing it. The consequence of failure, if it occurs, is minimal.

Repeatable - This relates to the ability to implement the change consistently over and over again without variations in the process or outcome. For a change to be considered standard, it must be repeatable. This means that the same steps are followed each time, and the results are consistent every time the change is made.

Predictable - This pertains to the expected outcomes of implementing the change. A predictable change is one where the outcome is known based on previous implementations or thorough testing. There shouldn't be any surprises when the change is made. The results of the change should be consistent every time it's implemented.

Any other criteria published on the BSC Website

- We propose to test these criteria by considering how well they apply to potential 'standard changes'

Standard Change framework: draft legal text and redlining

Standard Change framework	Fuel Type Changes	Other Change Types
Section F	Section Q	TBD
BSCP-40	Section X-1	
Section X-1		

Does the proposed modification conflict with the Transmission Licence

- The Transmission Licence in Licence Condition C3 paragraph 4 sets out clear requirements for the modification process, which is reflected in the BSC (section F). The BSC currently complies with those requirements.
- We are suggesting minor changes to Section F3.2 to remove “Standard Changes” from the procedural requirements of the CP process and refer to the new streamlined Standard Change Process in BSCP40.
- This does not contravene the wording in the Transmission Licence, because it does not change the modification process requirements in the Licence wording and in fact follows the modification process to effect this change.
- The Transmission Licence makes no reference to requirements set out in subsidiary documents.
- We therefore do not think that the Transmission Licence requirements are impacted by this proposed change.



POTENTIAL STANDARD CHANGES

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Background

- In the P463 Proposal, we proposed that Fuel Type changes on BMRS and MDD changes were good candidates for making standard changes
- However, unless additional candidates can be identified it may not be proportionate to introduce a generic standard change process. Instead, more targeted changes could be raised

Adding, amending or removing Fuel Types on BMRS (1 of 2)

- Once the legacy BMRS systems are turned off and Insights fulfils the BMRS obligations, we will be able to make Fuel Type changes within weeks, rather than months
 - Two new Interconnectors will have been implemented on Insights by the time this Modification is implemented (Viking and Greenlink)
- Therefore, the CP process now feels disproportionate for this type of change, given:
 - It is a low risk, predictable and well understood change
 - Elexon has not had any material consultation responses, resulting in changes to the solution (since at least 2017)
 - Consultation respondents have always supported the change (since at least 2017)
 - The committees/Panel have not rejected any changes (since at least 2017)
 - Fuel Types are pre-determined at registration and how the assets submit physical dynamic data in the Balancing Mechanism
 - Mean 1 change per year

Adding, amending or removing Fuel Types on BMRS (2 of 2)

Low Risk	Repeatable	Predictable
<ol style="list-style-type: none">1) Changes to fuel types has no impact on Settlement2) New system does not require complex code changes to ingestion logic3) Reporting has no major changes to schema and minimal impact to customers consuming the data.	<ul style="list-style-type: none">• Frequent change has resulted in well documented processes for system changes and testing• Changes to include a new fuel type on the data set with no major changes to schema• Future changes will not require code changes	<ul style="list-style-type: none">• Registration process highlights naming convention ahead of time• All system impact and reporting changes are known ahead of time• Previous changes have not come across unaccounted requirements during implementation

- Elexon believes that Fuel Type changes are suitable for following the streamline Standard Change process
- An 'enabling change' could be made to [Section Q](#) to remove the need for Panel approval and move the list of Fuel Types to the BSC Website. See sections 6.1.18 and 6.1.20
- This change would also be referenced in [Section X-1](#), General Glossary
- What does the Workgroup think?

Change to Market Domain Data (MDD) (1 of 3)

- Currently, all MDD changes must be issued for public consultation and seek SVG approval
- 36 changes (6 republishes) in the last three years
- Elexon has received 12 consultation responses in the last three years
- There has been 1 response in the last three years which resulted in a change to the suggested solution
- The committees/Panel has only rejected 1 change in at least the last three years
- There has been no material committee feedback

Change to Market Domain Data (MDD) (2 of 3)

Low Risk	Repeatable	Predictable
<ol style="list-style-type: none">1. Market Participants can submit requests to include or amend data for their associated MPIDs in MDD only2. Data submissions must meet set parameters set out in BSCP509 (Entity Forms) and cannot deviate away from the form structure3. Submissions are validated by Elexon and the CRA4. Only BSC Parties can submit requests to include or amend data5. Market Participants can respond to a monthly IA but this is very rarely happens and points raised are not material (Caveat - unless there is a larger project such as Targeted Charging Review - TCR)	<ul style="list-style-type: none">• MDD is version controlled and processed on a monthly basis• This has resulted in a well documented activity, made easier by the set requirements detailed within BSCP509 which need to be met in order to be entered into the central repository	<ul style="list-style-type: none">• MDD follows a strict timetable which is published each November/December to Industry• All data submitted for MDD is based on set structures with determined inputs and outputs

Change to Market Domain Data (MDD) (3 of 3)

- Elexon believes that MDD changes are suitable for following the streamline Standard Change process
- An 'enabling change' could be made to BSCP509 to allow MDD changes to follow the Standard Change process
 - No BSC impacts have been identified
- What does the Workgroup think?

Publication of new Data on BMRS based on upstream regulatory or code changes

- As a consequence of Grid Code changes or regulatory changes, there are routine requests to include new reporting onto the BMRS
- Elexon publishes numerous reports not within the BSC Governance; datasets published on the BMRS keeps this under the BSC Governance and Elexon accountable to BSC Panel to adhere to service standards
- An example of such changes is CG0156 which introduced obligations on NGENSO to facilitate the arrangements, including the publication of forecast demand data
- NGENSO is seeking to raise a consequential BSC modification that will provide a variation of Demand Forecast data by System restoration zones including GSP groups
- The solution is being formalised by NGENSO and the Modification IWA will go to the Panel early 2024
- Future similar changes can be candidates for Standard change:
 - New datasets that are variations of existing reports (e.g. demand, generation, events/alerting)
 - No downstream impacts other than suitable notice to consume the data
 - No impact on Imbalance Settlement calculations

Other potential candidates to test the criteria

Candidate	Low risk	Repeatable	Predictable
Supporting a, or additional, valid value within REMIT XSD on BMRS			
Standardising or improving consistency of content within reports with no change to schema on BMRS			
NG ESO/FSO changes, such as Demand Flexibility Service, that requires Elexon to make changes/incorporate new data items on BMRS			
De Minimis acceptance Threshold (DMAT)			
Continuous Acceptance Duration Limit (CADL)			
Value of Lost Load (VoLL)			
Loss of Load Probability (LoLP)			
Change to Line Loss Factors (LLFs)			
Credit Assessment Load Factor (CALF) Appeals			
Profiling			
Network Mapping Statement (for Seasonal Transmission Losses)			

- Key:
- Red - unsuitable against proposed Standard Change criteria
- Amber - potential to meet Standard Change criteria
- Grey - MHHS impact



TERMS OF REFERENCE

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Implementation Approach

- This change should be implemented at the earliest opportunity to realise the benefits
- The Implementation Date will depend on the solution, including the extent of any enabling changes and whether the Self-Governance criteria are met
- The recommended Implementation Date should therefore be determined by the Workgroup, but could be as quick as five Working Days after approval or in the next appropriate Standard BSC Release, subject to the implementation activities required for any enabling changes

P463 Specific Terms of Reference

ToR	Details
a)	What criteria should be met in order for a change to be established as a Standard Change?
b)	Is there a need for an objection or appeal mechanism within the Standard Change framework? If so, how should it be implemented?
c)	Which changes could follow the Standard Change process and, of those, which should be included in the Modification Proposal?

Terms of Reference (a)

What criteria should be met in order for a change to be established as a Standard Change?

- **Draft Criteria:**
- **Low risk** - A change is considered low risk when it has a minimal or negligible chance of causing adverse effects to the IT environment or the business processes it supports. This means that the change has been tested thoroughly, has been implemented multiple times in the past without significant issues, or is well understood by the teams implementing it. The consequence of failure, if it occurs, is minimal
- **Repeatable** - This relates to the ability to implement the change consistently over and over again without variations in the process or outcome. For a change to be considered standard, it must be repeatable. This means that the same steps are followed each time, and the results are consistent every time the change is made
- **Predictable** - This pertains to the expected outcomes of implementing the change. A predictable change is one where the outcome is known based on previous implementations or thorough testing. There shouldn't be any surprises when the change is made. The results of the change should be consistent every time it's implemented
- **Any other criteria published on the BSC Website**
- What does the workgroup think of the criteria?
 - This approach would mean the top three criteria could only be changed via a CP to BSCP40

Terms of Reference (b)

Is there a need for an objection or appeal mechanism within the Standard Change framework? If so, how should it be implemented?

- Does the Workgroup think that an objection or appeal mechanism is necessary within the Standard Change framework?
- If so, how should this be implemented?

Terms of Reference (c)

Which changes could follow the Standard Change process and, of those, which should be included in the Modification Proposal?

- Initial list of potential changes that could be classified as a Standard Change:
 - Adding, amending or removing Fuel Types on BMRS
 - Changes to Market Domain Data (MDD)
 - Publication of new Data on BMRS based on upstream regulatory or code changes
- Does the Workgroup consider any other Change Types to be good candidates for Standard Change?

P463 Standard Terms of Reference

ToR	Details
d)	How will P463 impact the BSC Settlement Risks?
e)	What changes are needed to BSC documents, systems and processes to support P454 and what are the related costs and lead times? When will any required changes to subsidiary documents be developed and consulted on?
f)	Are there any Alternative Modifications?
g)	Should P463 be progressed as a Self-Governance Modification?
h)	Does P463 better facilitate the Applicable BSC Objectives than the current baseline?
i)	Does P463 impact the EBGL provisions held within the BSC, and if so, what is the impact on the EBGL Objectives?

Terms of Reference (d)

How will P463 impact the BSC Settlement Risks?

- No expected impact, as we are not amending rules that impact Settlement

Terms of Reference (e)

What changes are needed to BSC documents, systems and processes to support P463 and what are the related costs and lead times? When will any required changes to subsidiary documents be developed and consulted on?

Standard Change framework	Fuel Type Changes	Other Change Types
Section F	Section Q	TBD
BSCP-40	Section X-1	
Section X-1		

- Exact costs and impacts will depend on agreed solution and what enabling changes are included
- No expected impact on BSC systems
- We propose to include any CSD changes as part of the Assessment Procedure Consultation, to give market participants visibility of the proposed changes
- We expect implementation costs to be low and for on-going costs to be reduced
- Assuming all redlining is drafted as part of the Assessment Procedure, implementation lead time should be < 3 months to update any internal processes
- Does the Workgroup have any views on redlined changes and the proposed implementation?

Terms of Reference (f)

Are there any Alternative Modifications?

- Do the Workgroup have a view on whether an Alternative Modification could better facilitate the BSC Objectives?

Terms of Reference (g)

Should P463 be progressed as a Self-Governance Modification?

- By definition, Standard Changes will be low risk and routine and therefore should not impact the Self-Governance criteria
- However, the exact impacts will need to be considered against the Self-Governance criteria, depending on which Change Types are to be included in P463
- Furthermore, amending the change process, could be considered a material impact on the Code's governance procedures (that would require the proposal to go to Ofgem for decision)

Terms of Reference (h)

Does P463 better facilitate the Applicable BSC Objectives than the current baseline?

- Proposer's view on Applicable BSC Objectives are that P463 better facilitates:
 - d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements
- P463 will better facilitate Applicable BSC Objective (d) as it will allow certain changes to be progressed more efficiently, reducing the burden for industry and Elexon
- This Modification is neutral against all other BSC Objectives
- Does the Workgroup agree that P463 better facilitates the Applicable BSC Objective than the current baseline?

Terms of Reference (i)

Does P463 impact the EBGL provisions held within the BSC, and if so, what is the impact on the EBGL Objectives?

- Initial view is that introducing the Standard Change framework does not impact on the EBGL provisions held within the BSC
- EBGL objectives may be affected, depending on the Change Types that are identified as meeting the proposed Standard Change criteria

Additional Consultation Questions

- **Standard Assessment Procedure Consultation questions seek industry views on:**
 - Do you agree with the Panel's initial recommendation that P463 should be approved?
 - Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P463?
 - Do you agree with the Panel that the draft amendments to the CSDs BSC deliver the intention of P463?
 - Do you agree with the Panel's recommended Implementation Date?
 - Do you agree with the Panel's initial view that P463 should not be treated as a Self-Governance Modification?
 - Do you agree with the Panel's initial consideration that P463 does not impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?
 - Do you agree with the identified consumer benefits?
 - Do you have any further comments on P463?
- **Specific Assessment Procedure Consultation questions:**
 - Do you agree with the proposed criteria for Standard Change?
 - Do you agree that the proposed Change Types are suitable candidates for Standard Change?
 - Do you think that any additional Change Types should be considered as potential Standard Changes?
- **Are there any additional questions the Workgroup would like to be included as part of the Assessment Consultation?**



NEXT STEPS

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Next steps

- Summary of Workgroup meeting decisions and actions by 22 December 2023
- Based on answers to P463 Terms of Reference, Elexon to draft Legal Text and prepare consultation documents
- A meeting to address any actions from meeting 1, review Legal Text and agree initial views will be necessary
- Workgroup 2 – members' availability?

Progression plan

Event	Date
Present IWA to Panel	9 November 2023
Workgroup meeting 1	19 December 2023
Workgroup meeting 2	W/C 15 January 2024
Assessment Procedure Consultation	5 February – 23 February 2024
Workgroup meeting 3	29 Feb to 5 Mar 2024 * risky
Workgroup Report presented to Panel	14 March 2024
Report Phase Consultation	18 March – 29 March 2024
Present Draft Modification Report to Panel	11 April 2024
Issue Final Modification Report to Authority	17 April 2024

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THANK YOU

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19 December 2023