

‘Amendment to provisions for Parties to bring claims against BSC Agents in BSC Section E’

This Modification proposes to amend BSC Section E to remove the requirement for Parties to be able to bring claims against BSC Agents. An industry Workgroup should be formed to consider what other measures (if any) might be appropriate to mitigate the impact of this on Parties.



Elxon recommends the Panel raises the attached Modification Proposal in accordance with the provisions of Section F - Modification Procedures F2.1.1 (d)(i)



Elxon recommends that this Modification is progressed to the Assessment Procedure for an assessment by a Workgroup



Elxon does not consider it likely that this Modification will impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC

This Modification is expected to impact:

- Elxon
- BSC Parties
- BSC Agents

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

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About This Document

You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary](#)¹.

This document is a recommendation to the BSC Panel to raise a Modification Proposal (Attachment A) in accordance with BSC Section F2.1.1(d)(i). Elexon will present this paper to the BSC Panel at its meeting on 11 April 2024. If the BSC Panel agrees to raise the Modification Proposal, this document will form its Initial Written Assessment (IWA), and the Proposal Form will be updated and published on the Elexon website accordingly.

There are two parts to this document:

- This is the main document. It provides details of the Modification Proposal, an assessment of the potential impacts and a recommendation of how the Modification should progress, including the Workgroup's proposed membership and Terms of Reference.
- Attachment A contains this Modification's Proposal Form.



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[Elexon Support](#)



Not sure where to start?

We suggest reading the following sections:

- Have 5 minutes? Read section 1
- Have 15 minutes? Read sections 1, 4, 5 and 6
- Have 30 minutes? Read all sections
- Have longer? Read all sections and the annexes and attachments.

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¹ <https://www.elexon.co.uk/glossary/?show=all>



BSC Section E

Section E contains the rules covering BSC Agents. It sets out which BSC services are required to be provided by BSC Agents, BSCCo's (Elxon's) role in contracting with BSC Agents; and the relationship between BSCCo, Parties and BSC Agents. It also contains provisions relating to the BSC Services Manager.



BSC Section F2.1.1(d)(i)

Section F sets out the rules and procedures for modifying the Balancing and Settlement Code (BSC, the Code). This includes procedures for proposing, consulting on, developing, evaluating and reporting to the Authority on potential modifications.

BSC Modification Procedures:

A proposal to modify the BSC can be made by:

- d. the Panel on the recommendation of Elxon under certain circumstances;

The circumstances for where the Elxon would make a recommendation to the Panel are limited to:

- (a) where Elxon thinks that the Modification:
 - i. would better facilitate achievement of the objective of promoting efficiency in the implementation and administration of the BSC arrangements.

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Why change?

BSC Section E 'BSC Agents' paragraph 2.4.1² (and related provisions) allow Parties to bring claims against BSC Agents. These requirements, which have always been heavily caveated, have never been used.

Moreover, their benefit to Parties has gradually eroded over time. This erosion is due to the increased complexity in the delivery of BSC Agent services, resulting in the distribution of service delivery responsibilities across software developers, other Technology Services Providers, and BSC Agents.

Elxon believes that the increased cost of BSC Agent services arising from maintaining these provisions now exceeds any benefit Parties are ever likely to obtain from them, and the requirement should be removed entirely or replaced with an alternative mechanism for ensuring accountability of BSC Agents.

Solution

It is proposed to amend BSC Section E which contains the rules covering BSC Agents. The proposed solution (for discussion by an industry Workgroup) aims to remove the requirements for Parties to be able to bring claims directly against BSC Agents.

Impacts and costs

Elxon expect costs to implement this Modification to be low (<£1k) as a document only change.

Elxon expect this Modification to indirectly impact Elxon, BSC Parties and BSC Agents as this Modification proposes to amend BSC Section E to remove the requirement for Parties to be able to bring claims against BSC Agents. Costs and further impacts on market participants will be determined as part of the Assessment Procedure.

There is no impact expected on the European Electricity Balancing Guideline (EBGL) Article 18 Terms and Conditions held within the BSC.

This Modification is not suitable for Self-Governance progression as it materially impacts the Code's governance or Modification procedures. It is therefore initially recommended that this Modification is sent to the Authority for decision.

This Modification does not impact the code drafting or system development for MHHS, although it will impact the contractual provisions with new BSC Agents required to put MHHS systems into live operation. These contractual arrangements are the responsibility of Elxon (as a market participant), not the MHHS Programme.

Implementation

This is expected to be a documentation-only change with no significant implementation costs. The eventual implementation approach will be discussed with the industry Workgroup, once the solution has been fully developed and impact assessed.

² <https://bscdocs.elxon.co.uk/simple-guides/section-e-bsc-agents>

Recommendation

Elexon invites the BSC Panel to raise this Modification Proposal in accordance with [BSC Section F 'Modification Procedures' 2.1.1\(d\)\(i\)](#)³. We believe this Modification proposal will better facilitate Applicable BSC objective (d), as it likely to reduce the cost of future BSC Agent procurements (including the procurement of a BSC Agent to operate the new elements of the Supplier Volume Allocation service required for MHHS, if the Modification Proposal is implemented by then). If the Panel agree this proposal should be raised, we recommend this Modification is progressed to the Assessment Procedure for an assessment by a Workgroup

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³ <https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures#section-f-2-2.1>



New Electricity Trading Arrangements (NETA)

It is the system of market trading arrangements under which electricity is traded in the United Kingdom's wholesale electricity market as of 27 March 2001. The arrangements provided that parties could trade off their imbalances close to real time. As of April 2005, NETA changed its name to the British Electricity Trading Transmission Arrangements, and expanding to become the single Great Britain electricity market of England, Wales and Scotland



Elxon Kinnect

Elxon Kinnect is a digital customer-centric platform delivering a smart and flexible central solution for the industry, which will be delivered through a number of releases over the next few years. The modular technology it uses will enable Elxon to implement BSC rule changes more quickly, and provide speedier support for innovation by existing companies and new entrants.

What is the issue?

BSC Section E2.4.1 (and related provisions) require that contracts between Elxon and BSC Agents include provisions that allow BSC Parties to take action directly against the BSC Agent, should they suffer losses as a result of failure to comply with the contract.

These provisions date back many years, and have not been updated to reflect gradual changes in the nature of the BSC Agent role. Rather than being entirely delivered by a single service provider, delivery of BSC Agent responsibilities now depend on a complex ecosystem of Technology Service Providers (e.g. cloud providers and software developers), as well as the contracted BSC Agent.

This change has brought significant benefit to Parties (such as additional flexibility and faster delivery of change), but does make it less likely that responsibility for any service failure would fall clearly on the contracted BSC Agent (and therefore reduce the value to Parties of the right to take action directly against them).

This gradual shift in the nature of the BSC Agent role has undermined the value of the E2.4.1 requirements, by reducing the benefit they offer to Parties, while also potentially making them more difficult to implement:

- The changed model for delivery of BSC Agent services means that a BSC Agent is more constrained in how services are delivered, and therefore the contractual terms holding them liable for failure to deliver have to be subject to caveats that reflect that. In practice this would make any attempt by a Party to take action against a BSC Agent more complex and risky.
- At the same time, potential ambiguity and doubt over the extent to which Parties could take action under the E2.4.1 requirements may increase the perceived risk of entering into BSC Agent contracts and potentially deter some potential service providers from taking on the role. This may reduce the value for money that Parties can obtain from BSC Agent contracts.

This potential issue has not prevented Elxon from modifying the current BSC Agent contract to allow for implementation of [Elxon Kinnect](#)⁴ (possibly because the incumbent BSC Agent has a deeper understanding of the potential risks than potential new service providers would).

However Elxon believe it could have a material impact on the value for money that can be achieved from any new BSC Agent contracts. The first such instance of this will arise later this year, when Elxon are required to appoint a BSC Agent to operate the new BSC Central Systems needed for [Market Wide Half-Hourly Settlement \(MHHS\)](#)⁵, so that these systems can be moved live operation for the start of MHHS transition. These new systems include the Load Shaping Service (LSS), Market-wide Data Service (MDS) and Volume Allocation Service (VAS).

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⁴ <https://www.elxon.co.uk/settlement/bsc-central-services/elxon-kinnect-platform/>

⁵ <https://www.mhhsprogramme.co.uk/programme-information/programme-overview>

Background

BSC Section E2.4.1 (and related provisions) require that BSC Agent Contracts (between Elexon and the BSC Agents delivering BSC services) should include terms allowing BSC Parties to bring claims directly against BSC Agents (for losses they suffer as a result of service failures).

These provisions were introduced at go-live of the New Electricity Trading Arrangements (NETA) in 2001, when the model for delivery of BSC Agent services was simpler, and a single service provider was much more directly responsible for delivery of the entire service, because:

- The new IT systems introduced for NETA were greenfield developments with minimal interfaces to legacy systems;
- The BSC Agent contract was much broader in scope, covering various aspects including business process operation, application maintenance and development, and hosting infrastructure; and
- The BSC Agent contract specified the service as a 'black box', with the BSC Agent committed to delivering specified business outcomes in Service Descriptions, with flexibility in choosing the method of delivery.

Since 2001 the delivery model has become significantly more complex, with a trend (accelerating in recent years) for the responsibilities of the BSC Agent to reduce and/or become shared with other parties:

- For many years, the maintenance and development of IT systems has been separated out from the BSC Agent role, and (in some cases) provided by a third party. The BSC Agent has typically undertaken significant acceptance testing activity prior to putting amended software into operational use, but Elexon is now looking to reduce their reliance on manual acceptance testing in order that Parties can benefit from more modern software testing practices (such as test automation and continuous integration);
- More recently, the migration of computation and data to the cloud has removed the need for the BSC Agent to provide hosting services. BSC Modification P456 (['Enable Elexon to procure ancillary Technology Services for use by BSC Agents'](#)⁶) removed any requirement for the BSC Agent to procure these cloud services, further reducing the scope of the BSC Agent role; and
- New technology delivered by the ['Elexon Kinnect'](#)⁷ programme has replaced manual processes with online self-service processes, reducing the need for the BSC Agent to operate manual business processes (to handle registrations and other customer interactions).

All these changes have reduced the scope of the traditional BSC Agent role, but contracts have not changed to reflect that, due to the Section E requirement that Elexon contract to deliver the Service Description.



Supplier Volume Allocation services

Supplier Volume Allocation (SVA) is the process that determines how much electricity each supplier's customers use during a settlement period.

SVA service provided by a Supplier Volume Allocation Agent (SVAA), calculates Primary Supplier BM Unit Metered Volumes based on SVA rules.

SVA services play a crucial role in the electricity market, ensuring accurate allocation of energy volumes to suppliers



BSC Agents

BSC Agents provide services that helps the running of the BSC. These services include Balancing Mechanism Reporting Service (BMRS), Central Data Collection Agent (CDCA) and Funds Administration Agent (FAA).

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⁶ <https://www.elexon.co.uk/mod-proposal/p456/>

⁷ <https://www.elexon.co.uk/settlement/bsc-central-services/elexon-kinnect-platform/>

Desired outcomes

The desired outcome is to amend BSC Section E to remove the requirement for Parties to be able to bring claims against BSC Agents. There will of course still be provisions in BSC Agent contracts that allow them to be held to account for any failure to provide the contracted service, but these will be more in line with those in a typical commercial contract (whereas the right for third parties to bring claims is unusual, and likely to deter some potential service providers).

Elexon expect that this will lead to reduced costs for BSC Parties (and ultimately consumers, to the extent that these costs are passed through) whenever Elexon procures new BSC Agent contracts.

This includes the procurement of new or amended BSC Agent contracts for delivery of Supplier Volume Allocation services for migrated MHHS Metering Systems; and the re-procurement of many of the key BSC Agent services when the current contracts end in 2026.

Related Modifications

This is one of two Modifications to Section E that Elexon will be presenting to the BSC Panel on 11 April 2024. The other Modification ('Amendment to BSC Section E to allow more flexibility in procurement of BSC Agents') seeks to give Elexon more flexibility in how it appoints BSC Agent(s) to operate the new BSC Central Systems required for MHHS. Elexon believe the two Modifications are largely independent of each other, although each will help facilitate the timely and cost-effective establishment of the new contractual requirements required before MHHS transition can begin.



Proposed solution

It is proposed to remove the requirements for Parties to be able to bring claims against BSC Agents in order to facilitate agreeing good terms with these service providers. It is also proposed that Workgroups will be able to consider any other mechanisms (for example a mechanism for the Panel to have some input into what steps Elexon takes in response to a material breach of a BSC Agent contract) that may be needed to provide Parties with Assurance.

This could be achieved via a change to the legal text concerning BSC Agent provisions in Section E, however an industry Workgroup will be brought together to consider the most appropriate solution, consider any unintended consequences and reaffirm views against the BSC Objectives.

Benefits

This Modification is expected to reduce the contracted costs of any future BSC Agents appointed to deliver BSC Service Description (by reducing the perceived risk for service providers of entering into such contracts. This will directly reduce costs for BSC Parties (and potentially reduce costs for consumers, to the extent that Parties pass on these cost savings).

The Proposed solution is also expected to benefit implementation of the MHHS Programme by reducing the cost of procuring any new BSC Agent contracts.

Applicable BSC 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	Neutral
(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

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
- (g) Compliance with the Transmission Losses Principle

Objective (d)

This Modification is expected to reduce the likelihood that entering into a BSC Agent contract is perceived by potential service providers as bringing financial risks that are hard to quantify and potentially unreasonable.

This will reduce the cost of procuring any new BSC Agent contracts (starting with the services required for MHHS transition), having a positive impact on Applicable BSC Objective (d).

Implementation approach

This Modification does not materially impact the Code's governance procedures relating to procurement of BSC Agents detailed in Section E and hence is proposed to be not Self Governance.

Given the proposed progression timeline for this proposal, potential impact on Elexon, BSC Parties and BSC Agents and the need for an industry Workgroup to assist with solution development and the currently understood pipeline of planned deliveries in 2025, Elexon and the Workgroup will assess the full impact on the industry after the solution has been developed and all impacts are understood. The impact on the industry will also be verified during the Assessment Consultation phase, in which any other industry impacts and lead times will be sought.

The exact implementation approach will be considered by the Workgroup as part of the Assessment Procedure, following completion of solution development and impact assessment.

4 Areas to Consider

In this section, Elexon highlight areas which we believe the Panel should consider when making its decision on how to progress this Modification, and which a Workgroup should consider as part of its assessment of this Modification. Elexon recommend that the areas below form the basis of a Workgroup's Terms of Reference, supplemented with any further areas specified by the Panel.

Current Related Modifications

This is one of two Modifications related to Section E that Elexon will be presenting to the BSC Panel on 11 April 2024. The other Modification ('Amendment to BSC Section E to allow more flexibility in procurement of BSC Agents') proposes to amend BSC Section E to allow more flexibility in the requirements for procurement of BSC Agents, to allow the option of having these systems operated by the service provider who developed them (at least for the duration of the transition period), while the currently-appointed Supplier Volume Allocation Agent (SVAA) continues to operate legacy processes. The proposed progression of the two Modifications will be similar, however there is an urgency to get the other Modification implemented before the MHHS transition.

Areas to consider

This Modification is likely to impact all BSC Agent and Parties as it is looking to amend the BSC Section E. We also wish to ascertain the likelihood of any unintended consequences resulting from this Modification.

The table below summarises the areas that we believe a Modification Workgroup should consider as part of its assessment of this Modification:

Areas to Consider
Which other mechanisms may be needed to provide Parties with Assurance? What are the risks associated and how they can be mitigated?
Which other measures (if any) might be appropriate to mitigate the impact of this on BSC Parties?
How does this Modification impact the BSC Settlement Risks?
What changes are needed to BSC documents, systems and processes to support this Modification and what are the related costs and lead times? When will any required changes to subsidiary documents be developed and consulted on?
Are there any unintended consequence of this Modification?
Are there any Alternative Modifications?
Should this Modification be progressed as a Self-Governance Modification?
Does this Modification better facilitate the Applicable BSC Objectives than the current baseline?
Does this Modification impact the EBGL provisions held within the BSC, and if so, what is the impact on the EBGL Objectives?

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5 Likely Impacts and costs

Estimated costs

Costs will be assessed during the Assessment Procedure; however, we have captured some initial assumptions that will be tested during solution development and impact assessment. For those roles we believe will be impacted, we have indicated in the impacts section whether we believe the costs are likely to be high, medium or low based on the following categories:

- High: >£1 million
- Medium: £100-1000k
- Low: <£100k

Implementation costs estimates			
Organisation	Item	Implementation costs (£)	Comment
Elexon	Systems	-	
	Documents	<£1K	Document only update to Section E
	Other	-	
NGESO	Systems	-	
	Other	-	
Industry	Systems & processes	-	
Total		<£1K	

On-going costs estimates		
Organisation	On-going costs (£)	Comment
Elexon	-	
NGESO	-	
Industry	-	
Total	-	No ongoing costs anticipated

Potential Impacts

Impact on BSC Parties and Party Agents		
Party/Party Agent	Potential Impact	Potential cost
All BSC Parties	Change in contractual arrangements will impact the ability of BSC Parties to take action directly against future BSC Agents	L
Generator	Cost saving in future contracts	L
Suppliers	Cost saving in future contracts	L

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There is little direct impact on BSC Parties, but all BSC Parties will be indirectly impacted through:

- Losing the contractual right to take action directly against future BSC Agents. The Workgroup will consider what other measures (if any) might be appropriate to mitigate the impact of this on Parties.
- For those Parties who contribute to Elexon’s Main Funding Share (such as Suppliers and Generators), cost savings arising from avoided costs in future BSC Agent contracts.

Impact on the NGESO	
Potential Impact	Potential cost
No impact has been identified (other than the impact on all BSC Parties described above)	-

Impact on BSCCo		
Area of Elexon	Potential Impact	Potential cost
Procurement of BSC Agent contracts	Making process of contractual arrangement more efficient by removing requirements that have never been used but may be contributing to the increased costs of the BSC Agent services	L

Impact on BSC Settlement Risks
No impact has been identified

Impact on BSC Systems and processes	
BSC System/Process	Potential Impact
Balancing and Settlement arrangements	Positive impact as this Modification will most likely reduce the cost of procuring any new BSC Agent contracts

Impact on BSC Agent/service provider contractual arrangements	
BSC Agent/service provider contract	Potential Impact
BSC Agents	Positive impact. Likely to reduce costs of the BSC Agent services

Impact on Code	
Code Section	Potential Impact
Section E	Amending Section E 2.4.1 (and related provisions) that allow Parties to bring claims against BSC Agents.

Impact on MHHS	
Positively impacts the future contractual provisions with new BSC Agents required to put MHHS systems into live operation	

Impact on EBGL Article 18 terms and conditions	
No impact identified	

Impact on Code Subsidiary Documents	
CSD	Potential Impact
No impact identified	

Impact on other Configurable Items	
Configurable Item	Potential Impact
No impact identified	

Impact on Core Industry Documents and other documents	
Document	Potential Impact
Ancillary Services Agreements	No impact identified
Connection and Use of System Code	
Data Transfer Services Agreement	
Distribution Code	
Grid Code	
Retail Energy Code	
Supplemental Agreements	
System Operator-Transmission Owner Code	
Transmission Licence	
Use of Interconnector Agreement	

Impact on a Significant Code Review (SCR) or other significant industry change projects

This Modification does not directly impact an SCR (although it is expected to lower the cost of implementing new BSC arrangements required for MHHS, which is itself being implemented through an SCR).

We have requested that Ofgem treat this Modification as exempt from any open SCRs.

Impact of the Modification on the environment and consumer benefit areas:

Consumer benefit area	Identified impact
1) Improved safety and reliability	Neutral
2) Lower bills than would otherwise be the case	Positive
3) Reduced environmental damage	Neutral
4) Improved quality of service	Neutral
5) Benefits for society as a whole	Neutral

We expect this Modification to reduce the costs paid by BSC Parties in future, by widening the pool of service providers competing for BSC Agent contracts, and reducing the risks that potential service providers need to price into their bids for providing these services. These avoided costs will also potentially reduce consumer bills (to the extent that BSC Parties are able to pass on the costs of operating the BSC to consumers).



What are the consumer benefit areas?

- 1)** Will this change mean that the energy system can operate more safely and reliably now and in the future in a way that benefits end consumers?
- 2)** Will this change lower consumers' bills by controlling, reducing, and optimising spend, for example on balancing and operating the system?
- 3)** Will this proposal support:
 - i) new providers and technologies?
 - ii) a move to hydrogen or lower greenhouse gases?
 - iii) the journey toward statutory net-zero targets?
 - iv) decarbonisation?
- 4)** Will this change improve the quality of service for some or all end consumers. Improved service quality ultimately benefits the end consumer due to interactions in the value chains across the industry being more seamless, efficient and effective.
- 5)** Are there any other identified changes to society, such as jobs or the economy.

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**What is the Self-Governance Criteria?**

A Modification that, if implemented:

(a) does not involve any amendments whether in whole or in part to the EBGL Article 18 terms and conditions; except to the extent required to correct an error in the EBGL Article 18 terms and conditions or as a result of a factual change, including but not limited to:

- (i) correcting minor typographical errors;
 - (ii) correcting formatting and consistency errors, such as paragraph numbering; or
 - (iii) updating out of date references to other documents or paragraphs;
- (b) is unlikely to have a material effect on:
- (i) existing or future electricity consumers; and
 - (ii) competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution, or supply of electricity; and
 - (iii) the operation of the national electricity transmission system; and
 - (iv) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and
 - (v) the Code's governance procedures or modification procedures; and
- (b) is unlikely to discriminate between different classes of Parties.

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Next steps

Elexon recommend that this Modification is submitted to the Assessment Procedure for consideration by an industry Workgroup.

Elexon recommend that this Modification is not suitable for Self- Governance as it materially impact the Code's governance procedures relating to procurement of BSC Agents detailed in Section E. Elexon therefore initially recommend that this Modification is sent to the Authority for decision.

Elexon believes that this Modification is expected to lower consumer bills than would otherwise be the case. This Modification is expected to reduce the costs paid by BSC Parties in future, by widening the pool of service providers competing for BSC Agent contracts, and reducing the risks that potential service providers need to price in to their bids for providing these services. These avoided costs will also potentially reduce consumer bills (to the extent that BSC Parties are able to pass on the costs of operating the BSC to consumers). However, further impacts need to be scoped out, and therefore, we recommend moving to the Assessment Phase where the Terms of Reference can be considered by a Workgroup.

This Modification is aiming to progress at a similar pace as the other Modification related to Section E, and will aim to progress at a similar timeline initially as the other Modification. These Modifications may attract and require similar expertise, though this Modification is expected to require more meetings so won't follow exactly the same path.

Workgroup membership

Elexon is seeking Workgroup members with expertise in:

- BSC Agent processes and working practices
- Section E obligations
- Contract and commercial risk management;
- Service management; and
- MHHS knowledge

Timetable

The proposed progression for this Modification is presented in the table below. This is subject to the discussions in the Workgroup, which may extend timescales within the Assessment Procedure.

Proposed Progression Timetable	
Event	Date
Present Initial Written Assessment to Panel	11 April 2024
Workgroup Meeting	W/C 06 May 2024
Assessment Procedure Consultation	1 August 2024 – 12 August 2024
Workgroup Meeting	w/c 26 August 2024
Present Assessment Report to Panel	12 September 2024
Report Phase Consultation	16 September 2024 – 27 September 2024
Present Draft Modification Report to Panel	10 October 2024
Issue Final Modification Report to Authority	16 October 2024

7 Recommendations

We invite the Panel to:

- **RAISE** this Modification Proposal in accordance with Section-F2.1.1(d)(i);
- **AGREE** that this Modification progresses to the Assessment Procedure;
- **AGREE** the proposed Assessment Procedure timetable;
- **AGREE** the proposed membership for the Workgroup;
- **AGREE** the Workgroup's Terms of Reference; and
- **NOMINATE** Lorna Lewin as the Panel's representative.