

ELEXON

Quality Delivery

Actively managing our services to ensure that we deliver in a reliable, economic and efficient way.

Innovation

Enhancing and evolving our services to support industry changes and development of the energy market.

Customer Centric

Improving the customer experience and developing richer customer relationships.

Simplification & Consolidation

Reducing complexity and fragmentation.

Digital Platform

Creating an agile digital platform to meet the changing energy market.

Please see Appendix A for an explanation of the different phases and reports.

BSC Change Report

Date of Panel meeting	10 November 2022	Paper number	332/02
Owner/author	Lawrence Jones	Purpose of paper	For Decision
Classification	Public	Document version	V1.0

The Change Report is a monthly summary of all Modifications, Change Proposals and Issues that are currently active. It shows the progress of each change in a visual 'progress bar,' as well as containing text updates on what has changed since last month's Change Report. This report covers updates since 3 October 2022 until 31 October 2022.

Summary of Open Changes

For details on the types of changes, the different phases, the types of reports and consultations please see Appendix 1.

Total changes open up until implementation

- Modifications: 18
- Change Proposals: 10
- Issues: 8

New changes since last month

- P449, Issue 104

Workgroups

- Ten Workgroup held since last month's report: P415 – 7 October, P426 – 20 October, P444 – 7 October, P448 – 4, 5, 6, 7, and 14 October, Issue 102 – 25 October, Issue 103 – 14 October
- Nine Workgroups coming up: P415 – late November, P441 – w/c 5 or 12 December, P442 – late November, P443 – November, P444 – late November, Issue 101 – 8 November, Issue 102 – 3 November, Issue 103 – 7 November, Issue 104 – w/c 14 November

Consultations

- Consultations closed since last month's report: P432 (Send Back Consultation): 12 October – 25 October, P434 (RPC): 14 October – 28 October, P448 (Urgent Consultation): 7 October – 12 October
- Live Consultations: P448 (Urgent EBGL Consultation): 14 October – 14 November

Awaiting decision

- Authority: P427
- In Self-Governance window: P437, P445

Decisions since last month

- Approved: P395, P447
- Rejected: None

Awaiting Implementation

- **Nov 22:** CP1559, CP1560, CP1563, CP1565, CP1566, CP1567, CP1570
- **Feb 23:** P376, P419, P428
- **Jun 23:** CP1558
- **Nov 23:** P395

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I. Modification Updates – up until decision

P395: Excluding generators from BM Unit Gross Demand and the calculation of EMR Supplier Charges		Update	
Date Raised:	7 November 2019	Proposer:	Centrica
Target Implementation Date:	2 November 2023	Current Status:	Awaiting implementation
Latest Update:	On 6 October 2022 the Authority approved P395 for implementation on 2 November 2023 (November 2023 BSC Release).		
Next Event:	P395 will be implemented on 2 November 2023 as part of the standard November 2023 BSC Release.		
Issue:	Currently the BM Unit Gross Demand Report attributes to Suppliers electricity they have provided to generators (including storage facilities) operated by Generation Licensees, which falls outside the definition of 'supply' in the Electricity Act 1989.		
Current Solution:	P395 proposes to amend BSC systems and processes so that the SAA-I042 'BM Unit Gross Demand Report' only includes electricity 'supplied' to premises by licensed Suppliers, and therefore excludes electricity imported by Generators operated by a licensee for generation activities (i.e. those activities authorised by their generation license to carry on). To facilitate this outcome, P395 proposes that the BSC incorporates the interim solution and extends it to cover complex sites too. This solution would cover sites connected to both the distribution and transmission systems, and where the sites Metering Systems are registered in Supplier Meter Registration Service (SMRS) or Central Meter Registration Service (CMRS). P395 will build on top of capabilities being introduced by P344, P375 and P383.		
History:	<p>For full details visit P395 webpage.</p> <p>Raised by Centrica on 7 November 2019.</p> <p>IWA – presented 14 November 2019 and progressed to the Assessment Phase.</p> <p>There was a delay in holding the first P395 Workgroup meeting caused by the urgent request to progress P397</p> <p>Workgroup 1 – held 19 February 2020 and discussed Elexon's interpretation of ToR A) 'Which imports should be chargeable?'. The Workgroup noted that answering the P395 problem satisfactorily will involve consideration of scalability, practicality and cost to ensure that the solution is truly enduring, consistent with regulations and scalable to domestic level.</p> <p>The Panel approved a six month extension to the Assessment Procedure to P395 on 9 April 2020 to allow for further solution development.</p> <p>Due to resource constraints and deprioritisation under the Panel's Covid-19 prioritisation approach, work on the Modification was paused until October 2020.</p> <p>The Panel approved an eight month extension to the Assessment Procedure for P395 on 10 September 2020. Elexon will return with the P395 Assessment Report at the June 2021 Panel meeting.</p> <p>Workgroup 2 – held 4 December 2020 and the Workgroup considered draft Business Requirements.</p>		

Workgroup 3 held 25 February 2021, where the group discussed some recommendations by the Low Carbon Contracts Company (LCCC) to expand the solution.

Workgroup 4 held 24 May 2021, where the Workgroup agreed remaining areas needed to impact assess, develop Legal Text and issue the Modification for consultation.

Workgroup 5 held 1 October, where the Workgroup agreed to align P395 declarations with P419 and Elexon provided updates on the challenges identified with impact assessment.

Workgroup 6 held 25 February 2022 where the Workgroup agreed a solution for Assessment Consultation. The Workgroup initially recommend, unanimously that P395 should be approved.

Workgroup 7 held on 28 March 2022, where the Workgroup discussed responses to the Assessment Consultation, which were supportive overall, noted that no arguments were raised and that their overall views against the BSC Objectives had not changed. The Workgroup recommend to the Panel that P395 is approved.

The P395 Assessment Report was presented to the BSC Panel at their meeting on 14 April 2022. The Panel initially recommend that the Modification should be approved.

P395 was issued for Report Phase Consultation in April 2022. No responses were received.

The Draft Modification Report for P395 was presented to the Panel on 9 June 2022. The Panel made no additional comments and agreed with all recommendations and that P395 should be approved by Ofgem.

The Draft Modification Report for P395 was presented to the Panel on 9 June 2022. The Panel made no additional comments and agreed with all recommendations and that P395 should be approved by Ofgem.

P395 was submitted to Ofgem for their decision on 13 June 2022 with a decision required by 6 October 2022.

P412: Ensuring non-BM Balancing Services providers pay for non-delivery imbalances at a price that reflects the real-time value of energy		No Update	
Date Raised:	3 September 2020	Proposer:	NGESO
Target Implementation Date:	TBC	Current Status:	Assessment Procedure
Latest Update:	The Panel agreed to a six month extension to the Assessment Procedure at its meeting on 14 July 2022.		
Next Event:	NGESO are continuing to engage with BEIS on the possibility of a derogation against Article 6(5) of the Clean Energy Package, which would remove the need to progress P412. Dependent on the outcome of the discussions with Ofgem and BEIS, further Workgroup meetings may need to be held to consider next steps in developing the P412 solution, or P412 could be withdrawn.		
Issue:	P412 will introduce imbalance charges for non-Balancing Mechanism (BM) Balancing Services providers, where their delivery does not match instructed volumes. This will mean the GB market more effectively meets the requirements of the Clean Energy Package.		
Current Solution:	P412 will introduce adjustments to Supplier's imbalance positions by non-BM Balancing Service Providers' instructed volumes, rather than delivered volumes as currently occurs under the P354 'Use of ABSVD for non-BM Balancing Services at the metered (MPAN) level' solution.		
History:	<p>For full details visit the P412 webpage.</p> <p>P412 was raised on 3 September 2020. The Initial Written Assessment was presented to the Panel on 10 September 2020 and entered into the Assessment Procedure.</p> <p>The first Workgroup meeting was held on 29 October 2020 to discuss the issue, the proposed solution, next steps and the proposed timetable.</p> <p>The second Workgroup meeting was held on 27 November 2020 to consider five possible solutions and discuss the pros and cons of each option.</p> <p>The third Workgroup meeting was held on 22 February 2021 to further consider the legal and technical issues with the five possible solutions.</p> <p>The fourth Workgroup meeting was held on 7 April 2021. The Proposer subsequently consulted the Workgroup and industry on the impacts that the solution options may have, to then present a cost benefit analysis to Ofgem to determine how P412 should proceed. This process was expected to conclude in November 2021. The Panel approved a six month extension to the Assessment Procedure at its meeting on 8 April 2021 for this analysis to take place. The Proposer's revised timetable for the cost benefit analysis consultation meant that it was issued in October 2021, with a view to then engage with Ofgem. Further Workgroup meetings may be required to consider the development of the solution and next steps.</p> <p>The Panel agreed to a nine month extension to the Assessment Procedure at its meeting on 14 October 2021. National Grid ESO's cost benefit analysis consultation was issued on 18 October 2021 and closed on 26 November 2021.</p>		

P415: Facilitating access to wholesale markets for flexibility dispatched by Virtual Lead Parties			Update
Date Raised:	30 September 2020	Proposer:	Enel X UK Ltd
Target Implementation Date:	Second half 2024	Current Status:	Assessment Procedure
Latest Update:	P415 Workgroup 14 was held on 7 October 2022, where the cost benefit analysis results were considered by the Workgroup.		
Next Event:	Workgroup meeting 15 will be held in late November or early December to review the legal text and prepare for the assessment consultation.		
Extension Request:	We request a four month extension to the Assessment Procedure for P415, returning with the P415 Assessment Report to the Panel at its standard meeting in April 2023. This is because the completion of the CBA took longer than expected due to availability over summer, and P444 has been raised (which P415 now needs to dovetail with). The recent urgent Modifications also meant ability to work on P415 was constrained in October.		
Issue:	Consumers of electricity who are able to be flexible about their consumption cannot currently obtain any value from that flexibility from the Wholesale Energy Market, except if they work with their Supplier to do so. This contrasts with Balancing Services, the Balancing Mechanism, and the Capacity Market, all of which allow a customer's flexibility to be offered by an aggregator without the involvement of the Supplier.		
Current Solution:	This Modification seeks to allow Virtual Lead Parties to obtain value from flexibility within the Wholesale Energy Market.		
History:	<p>For full details visit P415 webpage.</p> <p>Raised by Enel X UK Ltd on 30 September 2020.</p> <p>Presented on 8 October 2020, where the Panel agreed to progress P415 to the Assessment Phase.</p> <p>Workgroup 1 – held on 11 December and discussed the principles behind the Modification.</p> <p>Workgroup 2 – held on 9 February and discussed more complex worked examples.</p> <p>Workgroup 3 – held 25 March where the group considered how best to incorporate P376 functionality and considered network charging.</p> <p>Workgroup 4 – held on 27 May 2021 where the Workgroup discussed current network charging arrangements, VLP's role in the market and imbalance settlement.</p> <p>Workgroup 5 – CEPA prepared a CBA options paper on behalf of the Workgroup. The paper can be found on the P415 webpage.</p> <p>Workgroup 6 – held on 3 September 2021 where the Workgroup reviewed the approach to Supplier Compensation within the Cost Benefit Analysis piece.</p> <p>Workgroup 7 – held on 28 October 2021 where the Workgroup continued to assess credit and reporting requirements.</p> <p>Workgroup 8 – held on 10 December 2021, where the Workgroup noted updates related to the P415 CBA outcome and determined the method for separating wholesale market and balancing market volumes.</p>		

Workgroup 9 – held on 1 February 2022, where the Workgroup conducted an end-to-end solution review, noting the Proposer's preferred solution and capturing any alternative views

Workgroup 10 - held on 22 February, where CEPA presented and verified the cost-benefit analysis (CBA) methodology and assumptions with the Workgroup members.

Elexon issued the Call for Evidence for P415 to inform cost-benefit analysis (CBA) which closed on 9 May, receiving 9 responses from Suppliers, VLPs and NGESO.

Workgroup 11 – held on 30 May, where the P415 Workgroup met to consider methodologies for calculating the Supplier Compensation Reference Price.

Workgroup 12 - held on 1 July, where CEPA presented provisional CBA findings.

Workgroup 13 - held on 22 August, where CEPA presented CBA findings.

The final Cost Benefit Analysis Report, conducted by CEPA, was published on 22 September 2022.

P426: Combining related BSC Parties' Energy Indebtedness positions for the Credit Cover Percentage calculation			Update
Date Raised:	11 October 2021	Proposer:	Drax Energy Solutions Limited
Target Implementation Date:	TBC	Current Status:	Assessment Procedure
Latest Update:	The third P426 Workgroup meeting was held on 20 October 2022 to consider risk mitigations and further refine the solution. This meeting was held later than planned, due to constraints caused by the two urgent Modifications raised at the end of September. The Workgroup are concerned that despite the discussed mitigation actions, significant risks remain with the solution.		
Next Event:	The Proposer will consider which of the proposed risk mitigations presented by Elexon and discussed by the Workgroup they would like to be included in the solution. Once this feedback is received, Elexon will develop business requirements and request Service Provider Impact Assessment(s) to provide the Proposer and Workgroup with a view of costs and impacts. A further Workgroup meeting will be scheduled to be held in late December or early January to capture the Workgroup's views prior to Assessment Procedure Consultation.		
Issue:	<p>The current method for calculating BSC Party Energy Indebtedness is inefficient for Parties who have multiple BSC Parties within their group of companies.</p> <p>Currently, BSC Party Energy Indebtedness is calculated individually for each BSC Party (a legal entity, registered with Companies House) and Credit Cover must be lodged on that basis. Currently there is no option for companies within the same group to provide collective credit arrangements. With individual calculation and lodging of credit, Parties are unable to optimise provision into a single position resulting in disproportionate and inefficient levels of credit being lodged in aggregate.</p>		
Current Solution:	This Modification proposes to provide the option that related BSC Parties are able to rely on shared credit arrangements and provision. Where BSC Parties are related (i.e. within the same body corporate), the proposal is that the Energy Indebtedness of each BSC Party should be combined and the Credit Cover Calculation then performed on the combined position. Parties would assume joint liability in the event Elexon calls on Credit, and so overall risk to Settlement should remain the same as for the current arrangements.		
History:	<p>Drax Energy Solutions Limited raised P426 on 11 October 2021. The Initial Written Assessment was presented to the Panel on 14 October 2021. The Panel agreed by majority that P426 can progress for a six month Assessment Procedure.</p> <p>The Panel approved a four month extension to the Assessment Procedure at its meeting on 10 March 2022 due to delays forming and holding a quorate Workgroup.</p> <p>The first Workgroup meeting was due to be held on 27 April 2022 but was postponed due to quoracy issues.</p> <p>The first Workgroup meeting was held on 28 June 2022. The Workgroup considered the background to P426, the proposed solution and the Terms of Reference.</p> <p>The Panel agreed to a six month extension to the Assessment Procedure at its meeting on 14 July 2022.</p> <p>The second Workgroup meeting was held on 7 September 2022, and considered the requirements of the proposed solution.</p>		

P427: Publication of Performance Assurance Parties' impact on Settlement Risk		No Update	
Date Raised:	14 October 2021	Proposer:	BSC Panel
Target Implementation Date:	23 February 2023	Current Status:	With Authority
Latest Update:	The Draft Modification Report was presented to the Panel at its meeting on 8 September where it received a majority recommendation of approval for implementation on 23 February 2023.		
Next Event:	P427 awaits Authority decision, which is required by 2 February 2023.		
Issue:	Through industry engagement undertaken as part of the Performance Assurance Framework (PAF) review project, one of the problems identified was that issues often take longer to resolve than expected, given appropriate resource allocation to issue resolution by relevant market participants. This was particularly evident in respect of the Error and Failure Resolution (EFR) process where EFR plans often take a considerable time to be resolved, with many plans remaining open for over a year.		
Current Solution:	<p>P427 seeks to amend BSC Section Z – Performance Assurance to allow the Performance Assurance Board (PAB) to recommend that the Panel publish notices to industry in respect of Performance Assurance Parties' (PAPs') contribution to Settlement Risk along with relevant risk data.</p> <p>Additionally, notices detailing the error/impact would be published to industry if one of the following is triggered:</p> <ul style="list-style-type: none"> • Where a PAP within the EFR process fails against a milestone within its EFR plan after previously having been escalated to the PAB for the same EFR plan. • Where the PAB deems that the publication of one or more sets of performance data would have a beneficial impact on performance it may recommend to the Panel for said data to be published via Peer Comparison. • Where a PAP's action or inaction results in a market wide impact with a total materiality meeting or exceeding the market wide impact threshold proposed by the PAB and approved by the BSC Panel. • Where a PAP's action or inaction results in an impact to an individual Market Participant with a total materiality meeting or exceeding the individual BSC Party impact threshold proposed by the PAB and approved by the BSC Panel. 		
History:	<p>The BSC Panel raised P427 following its meeting on 14 October 2021.</p> <p>The Initial Written Assessment was presented to the Panel at its meeting on 14 October 2021. The Panel agreed unanimously that P427 can progress for a six month Assessment Procedure.</p> <p>The first Workgroup meeting was held on 19 January.</p> <p>The second Workgroup meeting was held on 1 March 2022 where the group further discussed the solution options and viewed the drafted redlining. The Panel also granted a three month extension for this Modification due to delays caused by forming a quorate Workgroup.</p> <p>The third Workgroup meeting was held 20 April where the Workgroup considered the updated redlining and voted on objectives for the Modification.</p>		

	<p>The fourth Workgroup was held on 10 May to finalise voting on the redlining. The Assessment Procedure Consultation (APC) was sent out to industry on 20 May 2022 with the Workgroup initially recommending approval of this Modification.</p> <p>An extension request was approved for P427 at the June Panel meeting as a contingency, however it was not needed. The Assessment Consultation closed on 10 June 2022 receiving nine responses, seven of which were in support of the solution. The fifth Workgroup was held on 16 June to discuss the responses. The majority of the Workgroup recommend that P427 is approved.</p> <p>The Assessment Report was presented to the Panel at its meeting on 14 July. The Panel made an initial recommendation to approve the Modification. The Report Phase Consultation was issued on 18 July, with responses invited by 18 August. We received six formal responses, with the majority believing P427 should be rejected. Five respondents responded to the Assessment Consultation but not the Report Phase Consultation. We contacted these participants to confirm if their views had changed. All five of them, held the same view as before, that P427 should be approved.</p>
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P432: Half Hourly Settlement for CT Advanced Metering Systems		Update	
Date Raised:	2 December 2021	Proposer:	Npower Commercial Gas Limited
Target Implementation Date:	29 June 2023	Current Status:	Send Back
Latest Update:	P432 was issued for a 10WD Send Back consultation with responses invited by 25 October. 17 responses to the consultation were received. The majority believed P432 should be approved. However, all Suppliers but one believed it should be rejected. The Workgroup considered the responses at a meeting on 27 October, where the Workgroup were split on whether P432 should be approved or rejected.		
Next Event:	The Draft Modification Report will be submitted to the Panel to gather its final recommendations to Ofgem, at its November Panel meeting.		
Issue:	Market-wide Half-Hourly Settlement (MHHS) requires that all Metering System Identifiers (MSIDs) are settled on a Half Hourly (HH) basis. The Code Change and Development Group (CCDG) has recommended moving CT Advanced Meters to settle HH by October 2023. If this recommendation is not implemented the risk that there will be insufficient time for Customers, Suppliers and their Agents to address issues that may arise will be increased, especially against the backdrop of the larger MHHS migration activities that will be needed for smart Meters.		
Current Solution:	This Modification seeks to align the BSC definition of an Advanced Meter with that in the Standard License Conditions (SLC) and to set explicit HH Settlement obligations for CT Advanced Meters ahead of the migration to MHHS. Existing CT Advanced Meters settling NHH are expected to migrate using the Change of Measurement Class (CoMC) process to settle HH by October 2023 and all new connections for CT Advanced Meters will be expected to settle HH from October 2022.		
History:	P432 was raised by Npower Commercial Gas Limited on 2 December 2021. The Initial Written Assessment was presented to the BSC Panel at its meeting on 9 December 2021, where it was progressed to the Assessment Procedure.		

The first Workgroup meeting for P432 was held on 24 January 2022. Elexon presented the background, issue and proposed solution for P432. The Workgroup considered the ToR and the next steps.

The second P432 Workgroup meeting took place on 23 February 2022. The Workgroup agreed on a solution for the Assessment Consultation, the draft legal text and the Assessment Consultation questions. The Workgroup initially recommend by majority that P432 should be approved.

The Panel granted P432 a one month extension at its March 2022 meeting due to quoracy issues holding the first meeting. Following the extension, the Assessment Report was scheduled to be presented to the Panel at its meeting on 12 May 2022, however a further extension request will be made at the April Panel meeting.

The Panel granted P434 a two month extension at its April 2022, as the consultation was issued later than planned due to delays with the review activities from Workgroup Members. We have planned for a fourth contingency Workgroup. Should this not be needed, we will present the Assessment Report to Panel at its June Meeting, otherwise at its July meeting.

The Assessment Procedure Consultation for P432 was issued on 30 March 2022 with responses invited by 22 April 2022. There were 10 responses with the majority disagreeing with the Workgroup that P432 should be approved. Concerns were also raised with the proposed implementation approach, driven by MHHS causing capacity issues.

The Workgroup considered the responses to the Consultation and by majority provided its final recommendation that P432 should be approved.

P432 Assessment Report was presented to the Panel on 9 June 2022. The majority of the Panel initially recommend P432 is rejected. The P432 Report Phase Consultation was issued on 15 June 2022, with responses due 1 July 2022.

The P432 Draft Modification Report was presented to the Panel on 14 July 2022. By majority the Panel's final recommendation to Ofgem was to reject P432. The P432 Final Modification Report was submitted for Ofgem decision on 20 July 2022.

On 26 August 2022 Ofgem sent P432 back to the Panel for further work as per BSC Section F, 2.7A.1(a) on the basis that they did not think sufficient evidence was provided that consumers will not be negatively impacted by increasing costs if migration is delivered on the existing timeframes or that the timeframe specified is necessary to deliver the required de-risking of MHHS implementation. Ofgem also requested a related DCUSA modification be raised and implemented before the P432 migration starts.

A Workgroup meeting was held on 29 September 2022, where the Workgroup members agreed on a new Implementation approach for P432 to address the Ofgem Send Back. The majority of the Workgroup believe P432 should still be approved.

P434: Mandate to Half Hourly Settle the Non-Half Hourly Unmetered Supplies Metering Systems			Update
Date Raised:	3 February 2022	Proposer:	Npower Commercial Gas Limited
Target Implementation Date:	+5 Working Days after Authority Decision	Current Status:	Report Phase
Latest Update:	The P434 Report Phase Consultation was issued on 14 October 2022, with responses due 28 October 2022. Eight responses were received to the consultation, with the majority agreeing that P434 should be approved.		
Next Event:	The Draft Modification Report will be presented to Panel to gather its final recommendations to Ofgem at the November Panel meeting.		
Issue:	MHHS requires that all Metering System Identifiers (MSIDs) are settled on a Half-Hourly (HH) basis. The Code Change and Development Group (CCDG) has recommended moving Non-Half Hourly (NHH) Unmetered Supplies (UMS) MSIDs to settle HH between October 2023 and October 2024, to mitigate the risk of not meeting the Transition Timetable set out by Ofgem in its Full Business Case		
Current Solution:	P434 proposes to mandate the Settlement of NHH UMS MSIDs on a HH basis and to place corresponding obligations on parties to co-operate in the Change of Measurement Class (CoMC) process between October 2023 and October 2024. The solution should also set a deadline by which any new UMS MSIDs have to be registered directly into the HH Settlement Process. It is proposed this is from October 2023.		
History:	<p>P434 was raised by Npower Commercial Gas Limited on 3 February 2022.</p> <p>The Initial Written Assessment was presented to the BSC Panel at its meeting on 10 February 2022, where it was progressed to the Assessment Procedure.</p> <p>The first Workgroup meeting for P434 was held on 18 March 2022. Elexon presented the background, issue and proposed solution for P434. The Workgroup considered the Terms of Reference and gave their initial views on the BSC Applicable Objectives. The Workgroup initially recommend P434 is approved.</p> <p>The Panel granted P434 a three month extension due to delays with P432 affecting the timeline for P434 caused by capacity issues with the Workgroup and Elexon. The second P434 Workgroup meeting took place 20 May, successfully meeting its objective for the meeting, to agree the draft legal text for the proposed solution and agree a solution for the CoMC process.</p> <p>The third Workgroup meeting was held on 8 June 2022. The Workgroup's initial recommendation by majority was to approve P434. The P434 Assessment Procedure Consultation was issued on 21 June 2022, with responses invited by 12 July 2022.</p> <p>The fourth Workgroup Meeting for P434 was held on 21 July 2022, where Elexon presented the Assessment Procedure Consultation responses to the Workgroup Members. Like P432, many of the Suppliers responding to the P434 Consultation didn't agree this Modification should be implemented separately to the MHHS Programme and couldn't see the benefits of implementing these changes earlier.</p> <p>The BSC Panel approved a three month extension for P434 so that further conversations with the MHHS Programme and a further Workgroup meeting can be held before presenting the Assessment Report to Panel by its November 2022 meeting, or earlier, if possible. This includes a one month contingency. The</p>		

Workgroup noted that the P434 compliance deadlines are fixed to the MHHS timetable and the MHHS Programme is currently finalising a re-plan.

The Assessment Report was due at the August Panel meeting, but at the planned final Workgroup meeting the Proposer, in light of the consultation responses, believed it was better to ask the MHHS Programme some additional questions to ensure that all available evidence to support the case for change was included in the Assessment Report. For example, to determine what the challenges will be for the Programme to transition straight into the TOM for NHH UMS i.e. without P434. Therefore, we requested a three month extension for P434 so we can have further conversations with the MHHS Programme and a further Workgroup meeting before presenting the Assessment Report to Panel by its November 2022 meeting, or earlier, if possible. The Panel granted the extension.

The fifth Workgroup meeting was held on 9 September 2022. The Workgroup was presented with the MHHS Programme's responses to their questions and their final votes and recommendations were gathered. The Workgroup by majority believe that P434 should be approved as it better facilitates Applicable BSC objectives (c) and (d).

The P434 Assessment Report was presented to the BSC Panel on 13 October 2022, where the Panel agreed to progress it to the Report Phase.

P437: Allowing non-BSC Parties to request Metering Dispensations			Update
Date Raised:	10 March 2022	Proposer:	BSC Panel
Target Implementation Date:	+10 Working Days after Self-Governance Objection window closes	Current Status:	Awaiting implementation
Latest Update:	The BSC Panel considered the Draft Modification Report at its meeting on 13 October 2022 and agreed to approve P437 under Self-Governance.		
Next Event:	The P437 Self-Governance Objection Window is open from 13 October to 3 November. If no appeals are received, P437 will be implemented in accordance with the Panel's determination on 17 November 2022.		
Issue:	Currently, Section L 'Metering' permits only the Registrant of the Metering System to apply for a Metering Dispensation, if for financial or practical reasons, the applicable Metering Equipment will or does not comply with the relevant Code of Practice. This limits the opportunity for an earlier submission, preferably in the design stage of the Metering site, as Registrants of a Metering System are typically appointed later than the recommended 14 weeks prior to energisation of the related Metering System.		
Current Solution:	Section L 'Metering' of the BSC will be amended to allow non-BSC Parties to request applications for Metering Dispensations. A Meter Operator Agent (MOA) will assess the proposed design and location of the Metering System and assess compliance against the BSC and the relevant CoP. The relevant MOA can make an application for a Metering Dispensation on behalf of the site operator.		
History:	<p>The BSC Panel raised P437 at its meeting on 10 March 2022. The Panel agreed to progress P437 to the Assessment phase.</p> <p>The first Workgroup meeting took place on 24 May. Elexon presented the background, issue and proposed solution for P437. The Workgroup provided their views on the proposed solution, which informed the draft redline text for the P437 solution.</p> <p>The Panel, at its March meeting, granted a two-month extension to the P437 Assessment Procedure to accommodate the delays caused by the quoracy issue.</p> <p>The second P437 Workgroup meeting took place on 23 June 2022, where the Workgroup considered agreed the proposed draft redline text, Assessment Consultation questions and finalised the Workgroup Terms of Reference (ToR).</p> <p>The P437 Assessment Consultation was issued on Monday 11 July, with comments welcomed by Friday 29 July 2022. Two comments were received from industry, with both respondents were in favour of implementing the P437 solution and agreeing with the Workgroup's initial views.</p> <p>The third P437 Workgroup meeting took place on Monday 8 August 2022, where the Workgroup considered the Consultation Responses, agreed the final solution and recommended to the Panel that P437 is approved.</p> <p>The P437 Assessment Report was presented at the September Panel meeting. The Panel made the decision to send P437 to the Report Phase.</p> <p>The P437 Report Phase Consultation was issued to industry for 10 Working Days on 14 September 2022, with responses due 28 September 2022. The Panel initially believed P437 should be approved. One response was received in support of the Modification.</p>		

P441: Creation of Complex Site Classes		Update	
Date Raised:	7 July 2022	Proposer:	Green Energy
Target Implementation Date:	29 June 2023	Current Status:	Assessment Procedure
Latest Update:	The second P441 Workgroup meeting was due to be held on 6 October but had to be cancelled due to the progression timetable of urgent Modification P448.		
Next Event:	The second Workgroup meeting is currently being scheduled for the week commencing the 5 or 12 December 2022.		
Issue:	<p>In recent years a number of queries have been raised to Elexon and in wider industry forums related to the scope of the Complex Site arrangements under the BSC. More specifically, when the BSC and its Code Subsidiary Documents (CSDs) permit the netting of Imports from Exports through a Complex Site arrangement and the scenarios in which this netting is permissible.</p> <p>During conversations under Issue 88 'Clarification of BSC Arrangements relating to Complex Sites' it was identified that certain arrangements have been allowed under the BSC although not clearly defined to facilitate consistency across the market. As so called "Local Energy Schemes" become more popular, it is essential that the rules for when netting should be permitted are clearly defined going forward.</p>		
Current Solution:	<p>P441 seeks to create six categories of Complex Site, each with clearly defined criteria.</p> <p>Classes 1 - 5 are intended to formalise the criteria for those "types" of Complex Site which are currently recognised as such and are already in use within the industry. In particular, a Class 5 Complex Site would set out the criteria in which netting across Boundary Points is permitted (for example, in order to facilitate the establishment of a Local Energy Scheme).</p> <p>A Class 6 Complex Site would be a 'non-standard' arrangement that has aspects of a complex site but does not clearly fit in any of the other five classes. This would be akin to the current process of assigning Central Volume Allocation (CVA) Metering System Identifiers (MSIDs) to a "standard" or "non-standard" BM Unit.</p>		
History:	<p>P441 was raised on 7 July 2022 by Green Energy. The Panel sent P441 to the Assessment Procedure Phase at its meeting on the 14 July 2022.</p> <p>The first Workgroup meeting took place on Wednesday 31 August 2022. At this meeting, the Workgroup considered the P441 background and issue, explored the Workgroup Terms of Reference, and discussed the potential solutions for P441.</p>		

P442: Reporting chargeable volumes for exempt and licensed supply		Update	
Date Raised:	7 July 2022	Proposer:	UC Energy Ltd
Target Implementation Date:	TBC	Current Status:	Assessment Procedure
Latest Update:	The first P442 Workgroup meeting was due to be held in the week commencing 3 October but, due to competing priorities this has had to be rescheduled.		
Next Event:	The first Workgroup meeting is being scheduled for late November. At this meeting, the Workgroup will consider the P442 Terms of Reference, as agreed by the Panel.		
Issue:	<p>Licensed Suppliers are required to pay charges on the electricity they supply, but energy supplied by an exempt Supplier should not be subject to these charges. Licence exempt suppliers are not able to sign up to all the industry codes that a licensed Supplier can, and are therefore required to obtain certain services (including registration of their customers' Metering Systems) from a licensed Supplier. As a result, the portfolio of Metering Systems registered by a licensed Supplier may include both licenced and exempt supply. A Licensed Supplier should therefore be charged based on its total supply minus any exempt supply.</p> <p>There is currently no process that allows for correct allocation of appropriate chargeable volumes for Supplier Volume Allocation (SVA) Metering Systems where a portion should be exempt, and another portion should be licensable.</p>		
Current Solution:	The proposed solution is for a new third party role, the "Exempt Supply Calculation Agent" (ESCA), to be defined. The ESCA would calculate the volumes of licensed and exempt supply, and submit them to central BSC Systems, based on metered data provided by the HHDC or Supplier. The ESCA would be required to undergo a qualification process to ensure compliance with Settlement requirements.		
History:	<p>P442 was raised on 7 July 2022 by UC Energy Ltd. The Panel sent P442 to the Assessment Procedure Phase at its meeting on the 14 July 2022.</p> <p>Following comments made by the Panel, Elexon liaised with BEIS about their review into exempt supply and considered how the timings may impact this Modification.</p>		

P443: To Cap NGESO Interconnector Trades at the Value of Lost Load (VoLL)		Update	
Date Raised:	17 August 2022	Proposer:	Saltend Cogeneration Company Ltd
Target Implementation Date:	+2 Working Days after Authority Decision	Current Status:	Assessment Procedure
Latest Update:	The first P443 Workgroup meeting was held on 15 September 2022, to consider the issue, the proposed solution, and the Terms of Reference.		
Next Event:	The second and third Workgroup meetings are due to be held in quick succession in November 2022 to further consider and develop the solution prior to Assessment Procedure Consultation. The scheduling of the second and third Workgroup meetings has been delayed due to constraints arising from the urgent Modifications and Workgroup Member availability. The P443 Assessment Report was due to be presented to the Panel at its meeting on 8 December 2022.		
Extension Request:	Therefore, we request a three month extension to the Assessment Procedure for P443, returning with the P443 Assessment Report to the Panel at its standard meeting in March 2023. This allows for the Christmas period and includes one month contingency.		
Issue:	At the current time National Grid Electricity System Operator (NGESO) can trade at prices above the Value of Lost Load (VoLL – as defined in BSC Section T 1.12). This adds to customers' costs and sends a signal to the markets that customers are willing to buy power at any price. In a cost of living crisis the Proposer does not believe that the British public are prepared to buy energy at any price.		
Current Solution:	The solution will require NGESO to cap its offers to Interconnector Users to no more than VoLL, as defined in the BSC. These trades are included in the Balancing Services Adjustment Data (BSAD) file, which is sent from NGESO to Elexon. Elexon process the BSAD file for the purposes of Settlement and reporting.		
History	<p>P443 was raised by Saltend Cogeneration Company Ltd on 17 August 2022.</p> <p>The Proposer requested that the Modification be treated as Urgent. The Panel considered the request at an Urgent Panel meeting on 18 August 2022 and voted by majority to recommend to the Authority that P443 should be treated as an Urgent Modification Proposal.</p> <p>The Urgency letter was sent to the Authority on 19 August 2022 with a response requested by 25 August 2022.</p> <p>The Authority decided on 25 August 2022 that P443 should not be progressed on an urgent basis and P443 will now follow a standard Assessment Procedure.</p>		

P444: Compensation for Suppliers and Virtual Lead Parties for Virtual Lead Party actions in the Balancing Mechanism		Update	
Date Raised:	1 September 2022	Proposer:	Flexitricity
Target Implementation Date:	Second half 2024	Current Status:	Assessment Procedure
Latest Update:	The first P444 Workgroup meeting was held on 7 October 2022, in conjunction with a P415 Workgroup meeting.		
Next Event:	The P444 Workgroup meetings will follow the same schedule as P415, with the next meeting held in late November or early December to review the legal text and prepare for the assessment consultation.		
Issue:	Under BSC arrangements introduced by P344 'Project TERRE implementation into GB market arrangements' there is no mechanism for compensation of Parties who have been affected by Virtual Lead Party (VLP) activity in the Balancing Mechanism (BM). As a result, Suppliers are commercially impacted and left with a cost from the Balancing Mechanism that they cannot recover.		
Current Solution:	This Modification would amend BSC systems and processes to introduce a compensation mechanism for Suppliers and VLPs when a VLP takes a Bid or Offer in the BM, to ensure a level playing field and enable correct incentivisation of flexibility. As part of P444 assessment, the Proposer and Workgroup will consider whether to incorporate the compensation mechanism being developed for P415.		
History:	P444 was raised by Flexitricity on 1 September 2022. The Initial Written Assessment was presented to the BSC Panel at their meeting on 8 September 2022. The Panel submitted P444 to the Assessment Procedure for assessment by a Workgroup.		

P445: Improving efficiency of Default Funding Share process and Energy Supply Company Administration		Update	
Date Raised:	8 September 2022	Proposer:	BSC Panel
Target Implementation Date:	+10 Working Days after Self-Governance Objection window closes	Current Status:	Awaiting implementation
Latest Update:	The Draft Modification Report for P445 was presented to the Panel on 13 October 2022, where the Panel approved P445 under Self-Governance.		
Next Event:	The P445 Self-Governance Objection Window is open from 13 October to 3 November. If no appeals are received, P445 will be implemented in accordance with the Panel's determination on 17 November 2022.		
Issue:	<p>The Default Funding Share (DFS) process requires nine Working Days (WD) from generating the Advice Note to receiving funds. The unpaid amount is mutualised and invoiced to all other BSC Parties pro rata after six WD. This leaves the Funds Administration Agent (FAA) with insufficient funds to balance payments to zero until the non-payment is recovered. The FAA must therefore use a borrowing facility to cover the debt with debt interest paid by all customers.</p> <p>If there are insufficient funds to cover payments out, the FAA will operate a shortfall process. This results in payments out to BSC Parties being scaled back until the funds can be recovered by DFS.</p> <p>This can have an impact on BSC Party cash flow and creates a significant administrative burden for the FAA, putting daily Trading Charge processes at risk. Further, the shortfall process does not impact all Parties equally, those that have amounts payable are not impacted.</p>		
Current Solution:	The solution is based on a change to FAA system, the BSC and Code Subsidiary Documents to allow Trading Charges for BSC Parties in Section H Default to be mutualised from the Advice Note date Advice Note/Notification date onwards without delay to reduce the duration of outstanding payments.		
History:	<p>The Panel raised P445 in accordance with BSC Section F.2.1.1(d)(i) at its meeting on 8 September 2022, as it agreed it would better facilitate Applicable BSC Objective (d). The Panel unanimously agreed that the Modification should be progressed directly to the Report Phase as the proposal is of a minor nature and the solution is fully developed. The Panel also had the initial view that P445 should be approved.</p> <p>The Report Phase Consultation was issued on 12 September 2022, with responses due 27 September 2022. No responses were received.</p>		

P447: Avoiding impact of Winter Contingency actions on cash-out prices		Update	
Date Raised:	28 September 2022	Proposer:	NGESO
Target Implementation Date:	+1WD following Authority decision	Current Status:	Implemented
Latest Update:	The Draft Modification Report was presented to the BSC Panel on 13 October, before being submitted to Ofgem for decision. On 21 October 2022 Ofgem approved P447 for implementation 1 Working Day later on 24 October 2022.		
Next Event:	P447 was implemented on 24 October 2022.		
Issue:	<p>This Modification would prevent negative impacts to the cash-out price if NGESO's Winter Contingency service is used.</p> <p>Due to the ongoing war in Ukraine and the potential for scarcity over the winter period the Electricity System Operator (ESO) has entered into additional bi-lateral contracts with coal generators that would otherwise not have been generating over the winter period.</p> <p>As per the agreed contract this service must be dispatched at £0/MW to minimise the impact on cashout and restrict payments to the providers of the service which would create unnecessary cash flows between parties and cause perverse incentives for Parties not to make generation available to the market leading to market price volatility and uncertainty.</p>		
Current Solution:	The proposed solution would require changes to BSC Sections T and X to allow Offers from certain BM Units ("Winter Contingency BM Units") to be treated (for purposes of calculating Imbalance Prices only) as having a very high price (£99,999/MWh).		
History:	<p>P447 was raised by National Grid ESO on 28 September 2022. The Proposer requested that the Modification Proposal be treated as urgent. The BSC Panel considered the request at an Urgent Modification Panel meeting on 29 September 2022, and recommended that the Modification should be treated as Urgent. The urgency request was submitted to Ofgem on 29 September 2022.</p> <p>Ofgem approved the urgency request on 4 October 2022. Elexon issued a 5WD consultation as part of the urgency timetable. As a consequential C16 change to the System Management Action Flagging (SMAF) statement to identify the Winter Contingency Service as System Flagged was also needed, NGESO ran a C16 consultation to similar timeframes as P447.</p>		

P448: Protecting Generators subject to Firm Load Shedding during a Gas Supply Emergency from excessive Imbalance Charges			Update
Date Raised:	28 September 2022	Proposer:	Scottish and Southern Energy
Target Implementation Date:	+1WD after Authority Decision	Current Status:	Urgent Assessment Procedure
Latest Update:	<p>P448 is being progressed via an urgent timetable and procedure approved by Ofgem. Joint Workgroup meetings, alongside GC0160, have been held on 4, 5, 6 and 7 October 2022.</p> <p>P448 was issued for industry Consultation on 7 October with responses invited by 12 October. 22 responses were received from industry. The majority of respondents felt that P448 was positive in terms of facilitating the BSC Objectives, however many respondents noted that it would only be positive if the solution was expanded to include the potential alternative options being considered.</p> <p>The fifth P448 WG meeting was held on 14 October, where the WG considered the consultation responses and agreed the P448 Proposed and Alternative Modification should be progressed. The solution for the Alternative Modification retains all the key aspects of the Proposed solution but it provides the NGSESVCS with additional powers that are intended to make the protection of the P448 solution available to a broader range of embedded generators</p> <p>The P448 Urgent EBGL Report, which contained the details of the P448 Proposed and Alternative Modification, was issued for industry Consultation on 14 October, with industry invited to respond by 14 November 2022.</p>		
Next Event:	The sixth P448 Workgroup meeting is scheduled to be held on Wednesday 16 November 2022, where the Workgroup will consider the responses to the EBGL Consultation and agree their final recommendation to the BSC Panel.		
Issue:	The war in Ukraine and resultant gas shortages in Europe significantly increases the risk of Generators in GB being prevented from generating this winter (due to Firm Load Shedding during a Gas Supply Emergency). If that happens Generators are likely to incur massive Imbalance Charges and credit cover requirements, potentially causing them to become insolvent. Even if such an Emergency does not occur, the risk that it could occur is likely to force Generators to reduce their forward and Day Ahead trading, reducing liquidity in electricity markets, and raising costs for electricity consumers.		
Current Solution:	This Modification proposes to address these risks by allowing such Firm Load Shedding instructions to be settled as Bids. A new Panel Committee will validate the Bid Payments and Imbalance Charges after the event, to verify that Generators have been protected from Imbalance Charges caused by events outside their control, but have not profited from the arrangements.		
History:	<p>P448 was raised by Scottish and Southern Energy on 28 September 2022.</p> <p>The Proposer requested that the Modification be treated as Urgent. The Panel considered the request at an Urgent Panel meeting on 29 September 2022 and voted unanimously to recommend to the Authority that P448 should be treated as an Urgent Modification Proposal.</p> <p>The Urgency letter was sent to the Authority on 29 September 2022. The Authority decided that P448 should be progressed on an urgent basis on 30 September 2022.</p>		

P449: Energy Bill Relief Scheme for non-domestic customers		New	
Date Raised:	31 October	Proposer:	NGESO
Target Implementation Date:	+1 Working Day after Authority Decision	Current Status:	Submission
Latest Update:	<p>P449 was raised by NGESO on 31 October.</p> <p>The Proposer requested that the Modification be treated as Urgent.</p>		
Next Event:	The Panel will consider the request at an Urgent Panel meeting on 1 November 2022.		
Issue:	<p>European energy prices have increased dramatically, following the ending of lockdown and the gas crisis initiated by Russia's invasion of Ukraine. Further rises are expected in the future and, as we approach winter, there are concerns over the number of businesses who may not be able to afford energy costs, resulting in potential for insolvencies and loss of jobs. It is also possible that the increased energy costs could cause further Supplier failures.</p> <p>As a result of these concerns the Government has proposed the Energy Bill Relief Scheme (EBRS) for non-domestic customers, with discounts applied to energy usage initially between 1 October 2022 and 31 March 2023. The intention is for Elexon to act as the EBRS electricity payment provider. The activities that Elexon is permitted to undertake are outlined in BSC Section C 'BSCCo and its Subsidiaries'. Currently, the activities stipulated in BSC Section C do not include provisions for the EBRS scheme.</p>		
Current Solution:	<p>The proposed solution is to make changes to BSC Section C to extend the vires for Elexon. The amendment would have to allow Elexon to undertake a new non-settlement related function as payment provider for the scheme.</p> <p>In contrast to the domestic Energy Price Guarantee Scheme (see P446 for details), Elexon is not required to carry out any calculations or validation of the claims for the EBR Scheme, as these processes will be carried out by BEIS.</p>		

II. Change Proposal Updates – up until Decision

CP1568: Inclusion of new LDSO-mastered SMRS data items in the SVA Data Catalogue, the REC EMAR Data Specification and BSCP604		Update	
Date Raised:	6 September 2022	Proposer:	Elexon
Target Implementation Date:	29 June 2023	Current Status:	Consultation
Latest Update:	CP1568 was issued for Industry Consultation on Monday 12 September 2022 with responses invited by Friday 7 October 2022. Seven consultation responses were received, with all respondents in support of CP1568.		
Next Event:	CP1568 will be presented to the SVG at its meeting on 1 November 2022, for decision.		
Issue:	CP1558 'New Registration data items and processes to support the MHHS transition', will introduce changes to BSCP501 and BSCP515 to specify six additional data items that each Licensed Distribution System Operator (LDSO) will be required to send to the relevant Supplier Meter Registration Agent (SMRA). The Supplier Meter Registration Service (SMRS) will then be required to send these new data items to the Electricity Enquiry Service ('EES', formerly known as 'ECOES'). However, before the EES can publish any new data items received from the SMRS, they must first be registered in the Retail Energy Code (REC) Energy Market Asset Repository (EMAR) Data Specification and the EES software will need to be amended to accommodate the data items. CP1558 did not include any change to the EMAR Data Specification so EES will not be able to publish the four new data items specified in CP1558 before this CP has been implemented		
Current Solution:	It is proposed that the EMAR Data Specification is amended to include the four new data items specified in CP1558 and the SVA Data Catalogue Volume 2 document is amended to include these new data items - plus one additional item which already exists in the EMAR Data Specification. BSCP604 will also be amended to allow the LDSO to request Retrospective Manual Adjustment of these six data items. BSCP501 and BSCP515 will be amended to align terminology with respect to these six data items, and also remove redundant references to 1998 Trading Arrangements Indicator. Note that no changes are required to the SVA Data Catalogue Volume 1, as the information sent by SMRS to EES is not specified as a Market Message (or data flow) in the EMAR Data Specification.		
History:	CP1568 was raised by Elexon on 6 September 2022. CP1568 Progression Paper was presented to the Supplier Volume Allocation Group (SVG) at its meeting on 6 September 2022. The committee agreed to progress the CP to the Consultation phase.		

CP1569: Amendments to the IDD documentation to align with SAA migration		Update	
Date Raised:	6 September 2022	Proposer:	Elexon
Target Implementation Date:	23 February 2023	Current Status:	Consultation
Latest Update:	CP1569 was issued for Industry Consultation on Monday 12 September 2022 with responses invited by Friday 7 October 2022. One response was received to the consultation in support of CP1569.		
Next Event:	CP1569 will be presented to the ISG at its meeting on 1 November 2022, for decision.		
Issue:	The Settlement Administration Agent (SAA) BSC System can currently access a database shared with the Central Registration Agent (CRA) BSC System and Central Data Collection Agent (CDCA) BSC System. However, the SAA BSC System will be migrated to a new cloud platform by February 2023 and will no longer have access to this shared database.		
Current Solution:	The proposed solution for this CP is to amend the NETA Interface Definition and Design (IDD) documentation to reflect the future state of the interactions between the SAA System and the CRA and CDCA Systems.		
History:	CP1569 was raised by Elexon on 6 September 2022. CP1569 Progression Paper was presented to the Imbalance Settlement Group (ISG) at its meeting on 6 September 2022. The committee agreed to progress the CP to the Consultation phase.		

III. Issue Updates

Issue 95: Assessing the continued use of TIBCO service as a source of data for market participants		Update	
Date Raised:	17 June 2021	Proposer:	Elexon
Latest Update:	Elexon have issued the Issue 95 Options to the Workgroup for review and comment. The group's final recommendations will be discussed in the final Workgroup meeting in November.		
Next Event:	Following the final Workgroup meeting, Elexon will finalise the Issue report with the aim of taking it to the December 2022 or January 2023 Panel		
Issue:	This Issue Group seeks to establish the future of the TIBCO messaging service with the migration of BMRS as part of Elexon's transformation programme. Elexon is building a new Solution for BMRS and need to understand views from BSC Parties to improve value with regards to data publications. Elexon believe it is now important to re-examine the requirements of BSC Parties and BMRS users in relation to the longevity and current implementation of the BSC obligations with respect to TIBCO.		

Issue 96: Assessing the reporting to EMRS of chargeable volumes for SVA Metering Systems that record both exempt and licensed supply		No Update	
Date Raised:	6 August 2021	Proposer:	UC Energy Ltd
Latest Update:	The Issue Report is currently being finalised but has experienced delays due to competing priorities with urgent Modifications.		
Next Event:	The Issue Report is being finalised with the intention of it being presented to the BSC Panel in December 2022.		
Issue:	The Balancing and Settlement Code Company (BSCCo) is required to provide to the Electricity Market Reform Settlement company (EMRS) the BSC Metered Volumes it requires to accurately calculate Capacity Market (CM) and Contracts for Difference (CFD) charges. This Issue seeks to explore enduring solutions which allow correct reporting to EMRS of chargeable volumes for Supplier Volume Allocation (SVA) Metering Systems that record both exempt supply and licensed supply. There is currently no process that allows for allocation of appropriate volumes where a portion should be exempt and another portion should be licensable.		

Issue 99: Review the use of the D0215 flow and its associated processes		Update	
Date Raised:	2 March 2022	Proposer:	UK Power Networks
Latest Update:	<p>The Issue 99 Consultation concluded on Friday 1 July 2022, with 13 comments received from Supplier Volume Allocation (SVA) Meter Operator Agents (MOAs), Licensed Distribution System Operators (LDSOs) and Suppliers.</p> <p>The second Issue 99 Workgroup meeting took place on Tuesday 2 August 2022. At this meeting, the Workgroup considered the RFI responses and agreed the final solution and draft redline text requirements.</p>		
Next Event:	<p>The third Issue 99 Workgroup meeting was due to be held in October but had to be delayed due to resource constraints caused by the urgent Modifications. The next Workgroup meeting is now likely to be held in early January 2023. At this meeting the Workgroup will consider the draft redline text, provide their feedback and conclude the Issue 99.</p>		
Issue:	<p>The D0215 data flow currently records some of the same information contained in the D0383 'Notification of Commissioning Information' data flow such as current and voltage transformer (CT/VTs ratios) (J0454 and J0455) respectively, therefore duplicating information across both data flows.</p> <p>The D0383 is populated following the Commissioning of Metering Equipment meaning the information in the D0383 has been validated as correct. However, the information in the D0215 is often unreliable, given it is requested prior to Commissioning. The Data Items within the D0215 that are not duplicated (Supply Capacity, Supply Voltage) may still be utilised and so the D0215 could be retained but edited to remove the duplication.</p>		

Issue 100: Assessing BSC Black Start processes to support NGESO's Distributed ReStart project		Update	
Date Raised:	5 April 2022	Proposer:	NGESO
Latest Update:	<p>After the first Issue Group meeting took place, NGESO proposed pausing the work of Issue 100 pending the outcome of the Markets and Funding Mechanism subgroup of Grid Code (GC) Modification GC0156 'Facilitating the Implementation of the Electricity System Restoration Standard'. NGESO believed this would be an efficient use of time as, although the subgroup is exploring system restoration more widely, it is felt it will have implications for Distributed ReStart and therefore Issue 100. The Proposer is comfortable with this approach and Issue 100 Workgroup Members have been informed and invited to join the GC0156 subgroup.</p>		
Next Event:	<p>The subgroup met for the final time on 11 October 2022 and is due to publish its report in November 2022. Elexon intend to share the subgroup report with the Issue 100 Workgroup, along with Elexon's comments, for the Workgroup to consider. The next steps will then be decided with the Proposer, considering the Workgroup's responses.</p>		
Issue:	<p>NGESO's Distributed ReStart project seeks to enable distribution-connected Plant to participate in an updated version of Electricity System Restoration (currently defined as Black Start in the BSC). This will broaden the range of providers who can offer the service, the networks it can be provided from and the situations in which these providers may be utilised.</p> <p>Distributed ReStart is a project exploring how distributed energy resources such as solar, wind and hydro, can be used to restore power to the transmission network in the unlikely event of a blackout, i.e., provide a Black Start service. It is expected that the provision of this new service will commence from 2025 onwards.</p> <p>The Issue Group will consider any BSC impacts and whether any changes to the BSC, Code Subsidiary Documents or BSC systems are required.</p>		

Issue 101: Ongoing Governance, Funding and Operation of the MHHS DIP		Update	
Date Raised:	13 July 2022	Proposer:	Elexon
Latest Update:	<p>The first Issue 101 Workgroup meeting was held on 13 September 2022, where the Workgroup considered the progression plan for the Issue and the Terms of Reference. The Workgroup also had initial discussions on Governance.</p>		
Next Event:	<p>The second Issue 101 Workgroup meeting will be held on 8 November 2022, where the Workgroup will discuss Governance and Change Management for the DIP.</p>		
Issue:	<p>An Event Driven Architecture (EDA) platform is being developed as a key component to support delivery of the Market-wide Half Hourly Settlement (MHHS) Target Operating Model (TOM) and will be able to respond to the increase in volume and frequency of data more quickly than the current arrangements. The Data Integration Platform (DIP) is the delivery mechanism for the MHHS EDA.</p> <p>Issue 101 intends to define the requirements and principles for the on-going DIP arrangements that can be included in the subsequent BSC Modification, including the ongoing governance, funding and operation of the DIP.</p>		

Issue 102: BSC Change Process Review		Update	
Date Raised:	17 August 2022	Proposer:	Elexon
Latest Update:	The first Issue Group Meeting was held on 25 October 2022, where potential ideas and quick wins were shortlisted.		
Next Event:	The second Issue 102 meeting is scheduled for 3 November 2022, to score and prioritise the ideas and quick wins. Subject to the outcomes from this second meeting, an update will be provided to the panel on 10 November 2022 to seek agreement on next steps.		
Issue:	<p>A stakeholder survey conducted by Elexon identified a number of key issues/possible areas for improvement in the BSC Change process. The Issue Group will review the BSC Change process to identify possible ways in which these key issues could be addressed or the BSC Change Process could be improved.</p> <p>The key issues/areas for improvement that the review will consider are summarised below:</p> <ul style="list-style-type: none"> • There is a perception that the BSC Change process, like other codes' change processes, is slow and that the benefits associated with BSC Changes could be realised more quickly; • The BSC Change process is considered complex and it can be difficult for those participating in the process to understand what will be required from them in the various stages in the development of a change. This may dissuade parties from engaging in the BSC Change process and limit stakeholder participation. • Not all categories of stakeholder are consistently represented in the development of BSC Changes. Smaller organizations in particular tend to be underrepresented. <p>Whilst we expect the Issue Group to identify and if appropriate develop the potential solutions in the course of its work we require that any solutions developed will achieve at least one of the following:</p> <ul style="list-style-type: none"> • Speed up the BSC Change Process; • Simplify the BSC Change Process; • Improve quality of BSC Change solutions and reports. <p>We recognise that some trade-offs may be required between speeding up and simplifying the BSC Change process and ensuring that the quality of BSC Change solutions and reports are maintained or improved.</p>		

Issue 103: Meter Registrants and Settlement Risk – A New Way		Update	
Date Raised:	24 August 2022	Proposer:	Western Power Distribution
Latest Update:	The first Issue 103 meeting was held on 14 October 2022 where additional controls to be included to mitigate Settlement errors, and customer consumption monitoring were discussed.		
Next Event:	The second Issue Group Meeting will be held 7 November 2022. The Workgroup will consider who is best placed to ensure overall Metering System accuracy and decide if any changes are required due to impacts associated with Independent Connection Providers (ICPs) installing Meters.		
Issue:	<p>The Proposer believes that there would be value in reviewing existing controls for Settlement error prevention. It is critical to the Proposer that we address these problems prior to the Settlement timetable being shortened by Market-wide Half Hourly Settlement (MHHS) as the opportunities to readdress will be reduced thereafter.</p> <p>The Settlement system is crucial to the smooth operation of the GB energy market. Data used within that system is fundamental to Settlement accuracy.</p> <p>Preventative and detective assurance of the Settlement data is required at all stages of Settlement from Metering and Registration onwards to maintain accuracy and reduce the variation of data at later stages of the Settlement process. This assurance is required as Settlement errors can have a significant financial impact on Parties where they have over/under paid Settlement charges.</p>		

Issue 104: Extending RTS Cost Recovery Arrangements Under the BSC		New	
Date Raised:	26 October 2022	Proposer:	Elexon
Latest Update:	Issue 104 was raised by Elexon on 26 October 2022.		
Next Event:	The first Issue Group meeting is likely to be on week commencing (W/C) 14 November 2022.		
Issue:	<p>The contract between Elexon and the Energy Networks Association (ENA) to pass the operational costs for the Radio Teleswitch Service (RTS) through the BSC as 'BSC Costs' is due to expire on 31 March 2023. The BSC pass-through operational costs are expected to rise from c.£1.5m to a possible c.£5.5m. Therefore, Elexon wishes to re-establish industry support for passing RTS costs through the BSC from April 2023 onwards, and confirm how the costs should be apportioned (for example Suppliers/Generators). It's worth mentioning that since the BSC acts as a pass-through intermediary, Elexon has no control over the RTS cost, which is set through an ENA/BBC contract.</p> <p>The BBC have advised the ENA that the operational costs for the RTS are rising primarily due to increases in the cost of electricity needed to power the Long Wave Radio transmitters (as advised by the BBC). It's worth noting that due to its strict internal financial governance controls, the BBC are not permitted to make a profit from providing the RTS service.</p> <p>Whilst suppliers are continuing the rollout of Smart Meters, there is a need to extend and utilise RTS to ensure that customers using Load Switching devices can continue to be supported until a Smart metering solution, or alternative proposals, are installed. Any Supplier can gain customers with Teleswitch metering arrangements.</p> <p>Without the RTS service operating, and without an alternative solution, it is highly likely that the way in which existing Radio Teleswitched equipment operates will become very unpredictable, and in extreme cases, some consumers could lose hot water and heating functionality.</p>		

IV. Progression of Modifications – up until implementation

Key	Initial Written Assessment:	Assessment Procedure: AR: Assessment Report APC: Assessment Procedure Consultation	Report Phase: RPC: Report Phase Consultation DMR: Draft Modification Report FMR: Final Modification Report	WA: With Authority Awaiting Decision	AI: Awaiting Implementation	I: Implementation	CBA: Cost/Benefit Analysis
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Mod	Title	Proposer	Date Raised	Urgent	Sep	Oct	Nov	Dec	Jan	Feb	Mar
P376	Utilising a Baseline Methodology to set Physical Notifications for Settlement of Applicable Balancing Services	Enel Trade S.P.A.	11 Dec 2018	No							
P395	Excluding generators from calculation of EMR Supplier Charges	Centrica	7 Nov 2019	No							
P412	Ensuring non-BM Balancing Services providers pay for non-delivery imbalances at a price that reflects the real-time value of energy	NGESO	3 Sep 2020	No							

Mod	Title	Proposer	Date Raised	Urgent	Sep	Oct	Nov	Dec	Jan	Feb	Mar
P415	Facilitating access to wholesale markets for flexibility dispatched by Virtual Lead Parties	Enel X	30 Sep 2020	No							
P419	Enhanced Reporting of demand data to NETSO to facilitate BSUoS Reform	NGESO	6 May 2021	No							
P425	Amendment to the definition of Shared SVA Meter Arrangement	E.ON Energy Solutions Limited	6 Oct 2021	No	WA	I					
P426	Combining related BSC Parties' Energy Indebtedness positions for the Credit Cover Percentage calculation	Drax Energy Solutions Limited	11 Oct 2021	No							
P427	Publication of Performance Assurance Parties' impact on Settlement Risk	BSC Panel	14 Oct 2021	No	DMR/ FMR	WA					
P428	Correction to P376 Legal Text	BSC Panel	11 Nov 2021	No							
P432	Half Hourly Settlement for CT Advanced Metering Systems	Npower Commercial Gas	2 Dec 2021	No	AP		DMR/ FMR	WA			
P434	Mandate to Half Hourly Settle the Non-Half Hourly Unmetered Supplies Metering Systems	Npower Commercial Gas Limited	3 Feb 2022	No			AR/ RPC	DMR/ FMR	WA		

Mod	Title	Proposer	Date Raised	Urgent	Sep	Oct	Nov	Dec	Jan	Feb	Mar
P437	Allowing non-BSC Parties to request Metering Dispensations	BSC Panel	10 Mar 2022	No	AR/ RPC	DMR/ FMR	I				
P440	Enabling Elexon to administer the Capacity Market Advisory Group	NGESO	10 May 2022	No	I						
P441	Creation of Complex Site Classes	Green Energy	14 Jul 2022	No				AR			
P442	Reporting chargeable volumes for exempt and licensed supply	UC Energy Ltd	7 Jul 2022	No							
P443	To Cap NGESO Interconnector Trades at the Value of Lost Load (VoLL)	Saltend Cogeneration Company Ltd	17 Aug 2022	No		APC		AR	RPC		
P444	Improving efficiency of Default Funding Share process and Energy Supply Company Administration	BSC Panel	8 Sep 2022	No	IWA/ RPC	DMR/ FMR	WA	I			
P445	Improving efficiency of Default Funding Share process and Energy Supply Company Administration	BSC Panel	8 Sep 2022	No	IWA/ RPC	DMR/ FMR	I				
P446	Energy Price Guarantee Scheme for domestic customers	NGESO	13 Sep 2022	Yes	IWA/ DMR/ I						
P447	Avoiding impact of Winter Contingency actions on cash-out prices	NGESO	28 Sep 2022	Yes	IWA	I					

Mod	Title	Proposer	Date Raised	Urgent	Sep	Oct	Nov	Dec	Jan	Feb	Mar
P448	Protecting Generators subject to Firm Load Shedding during a Gas Supply Emergency from excessive Imbalance Charges	Scottish and Southern Energy	28 Sep 2022	Yes	IWA	APC/ RPC	DMR/ FMR/ I				
P449	Energy Bill Relief Scheme for non-domestic customers	NGESO	31 Oct 2022	TBC		IWA/ DMR/ I					

V. Progression of Change Proposals – up until implementation

Key	Assessment Procedure: PP: Progression Paper	CPC: Change Proposal Circular Consultation	Committee Decision: AR: Assessment Report FR: Final CP Report	AI: Awaiting Implementation	I: Implementation
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Mod	Title	Proposer	Date Raised	Sep	Oct	Nov	Dec	Jan	Feb	Mar
CP1558	New Registration data items and processes to support the MHHS transition	Elexon	16 Feb 2022							
CP1559	Complex Sites Process Improvements	Elexon	22 Feb 2022			I				
CP1560	Demand Control Event Settlement Adjustment Process Clarifications	Elexon	3 Mar 2022			I				
CP1563	Altering the Trigger Point for CT Commissioning	Northern Power Grid	5 Apr 2022	AI		I				
CP1565	Updates to address Central Management System issues	Elexon	6 Jul 2022	AR	AI	I				
CP1566	Introducing the CVA Commissioning End to End Check (CEEC)	Elexon	5 Jul 2022	AR	AI	I				
CP1567	Creation of a new BSCP for Assurance Information Requests (AIRs)	Elexon	14 Jul 2022	AR	AI	I				

Mod	Title	Proposer	Date Raised	Sep	Oct	Nov	Dec	Jan	Feb	Mar
CP1568	Inclusion of new LDSO-mastered SMRS data items	Elexon	6 Sep 2022	PP/ CPC	CPC	AR	AI			
CP1569	Amendments to the IDD documentation to align with SAA migration	Elexon	6 Sep 2022	PP/ CPC	CPC	AR	AI		I	
CP1570	Housekeeping amendments to BSCP65 and BSCP70 to include reference to 'Asset Metering Virtual Lead Party'	Elexon	6 Sep 2022	AR /FR	AI	I				

VI. BSC Releases Road Map

The tables below summarise the scope of each BSC Release. Further information can be found on the [Releases](#) page of our website.

November 2022 Release			
Change Number	Title of Change	BSC Central Systems/Document only	Current Status of Change
CP1559	Complex Sites Process Improvements	Document Only	7. Implementation Phase
CP1560	Demand Control Event (DCE) Settlement Adjustment Process clarifications	Document Only	7. Implementation Phase
CP1563	Altering the Trigger Point for CT Commissioning	Document Only	7. Implementation Phase
CP1565	Updating BSCP520 to address operational issues in the Central Management System	Document Only	7. Implementation Phase
CP1566	Introducing the CVA Commissioning End-to-End Check (CEEC)	Document Only	7. Implementation Phase
CP1567	Creation of a new BSC Procedure (BSCP) for Assurance Information Requests (AIRs)	Document Only	7. Implementation Phase
CP1570	Housekeeping amendments to BSCP65 and BSCP70 to include reference to 'Asset Metering Virtual Lead Party'	Document Only	7. Implementation Phase

February 2023 Release			
Change Number	Title of Change	BSC Central Systems/Document only impacts	Current Status of Change
P376	Utilising a baselining methodology as an alternative to Physical Notifications	System	7. Implementation Phase
P419	Enhanced Reporting of demand data to NETSO to facilitate BSUoS Reform	System	7. Implementation Phase
P428	Correction to P376 Legal Text	Document Only	7. Implementation Phase

June 2023 Release			
Change Number	Title of Change	BSC Central Systems/Document only impacts	Current Status of Change
CP1558	New Registration data items and processes to support the transition to MHHS	Document Only	7. Implementation Phase

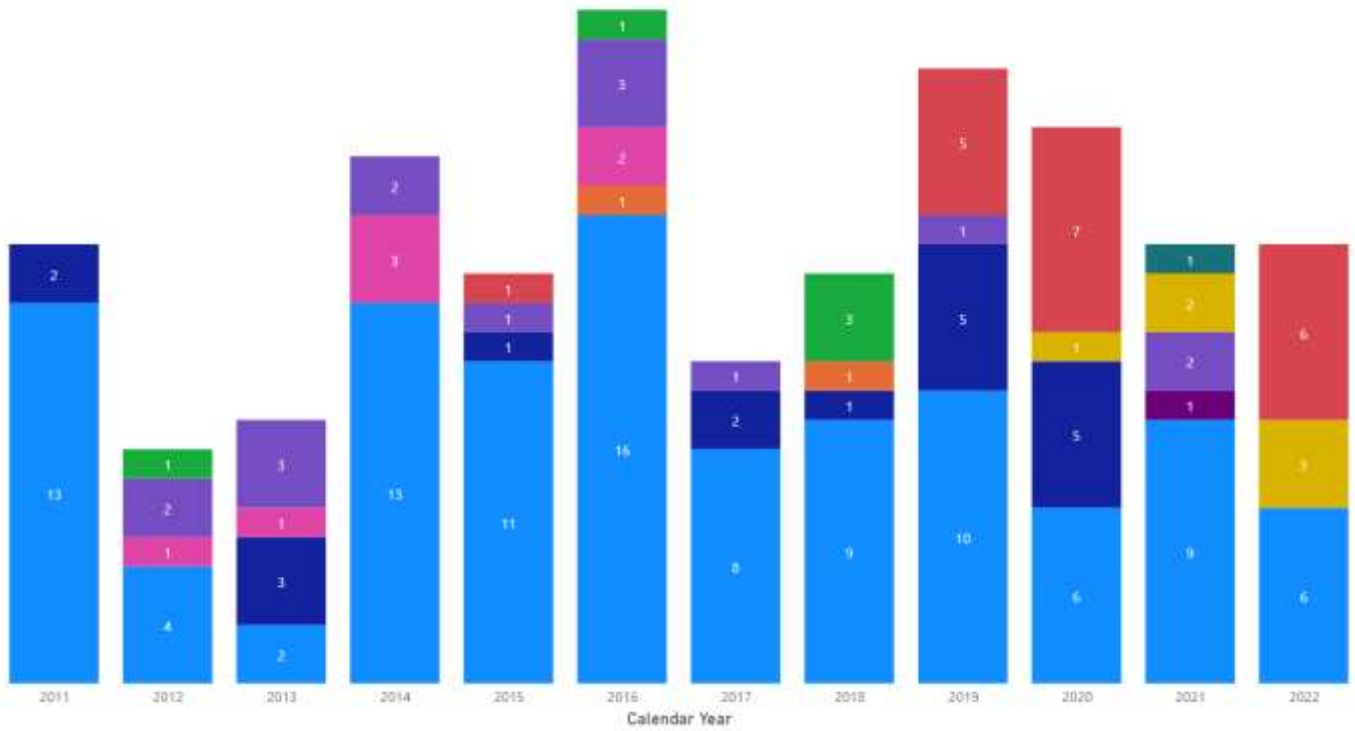
November 2023 Release			
Change Number	Title of Change	BSC Central Systems/Document only impacts	Current Status of Change
P395	Final Consumption Levies (FCLs)	System	7. Implementation Phase

TBC Release Date				
Change Number	Title of Change	BSC Central Systems/Document only impacts	Current Status of Change	Target Implementation Date
P412	Ensuring non-BM Balancing Services providers pay for non-delivery imbalances at a price that reflects the real-time value of energy	System	4. Assessment / Consultation Phase	Jun 24
P415	Facilitating access to wholesale markets for flexibility dispatched by Virtual Lead Parties	System	4. Assessment / Consultation Phase	Dec 24
P426	Combining related BSC Parties' Energy Indebtedness positions for the Credit Cover Percentage calculation	System	4. Assessment / Consultation Phase	Nov 23
P427	Publication of Performance Assurance Parties' impact on Settlement Risk	Document Only	6. Authority Decision / SG Appeal Window	Feb 23
P432	Half Hourly Settlement for CT Advanced Meters	Document Only	5. Report / Panel Decision Phase	5WD after Authority decision
P434	Enabling change to move NHH Unmetered Supplies to HH Settlement for Market-wide Half-Hourly Settlement	Document Only	5. Report / Panel Decision Phase	5WD after Authority decision
P437	Allowing non-BSC Parties to request Metering Dispensations	Document Only	6. Authority Decision / SG Appeal Window	5WD after Authority decision
P441	Creation of Complex Site Classes	Document Only	4. Assessment / Consultation Phase	Jun 23
P442	Reporting to EMRS of chargeable volumes for SVA Metering Systems that record both exempt and licensed supply	System	4. Assessment / Consultation Phase	TBC
P443	To Cap NGESO Interconnector Trades at the Value of Lost Load (VoLL)	Document Only	4. Assessment / Consultation Phase	2WD after Authority decision
P444	Compensation for Virtual Lead Party actions in the Balancing Mechanism	System	4. Assessment / Consultation Phase	TBC
P445	Improving efficiency of Default Funding Share process and Energy Supply Company Administration	System	4. Assessment / Consultation Phase	10WD after Self-Governance Objection window closes
P448	Protecting Generators subject to Firm Load Shedding during a Gas Supply Emergency from excessive Imbalance Charges	Document Only	4. Assessment / Consultation Phase	1WD after Authority decision
P449	Energy Bill Relief Scheme for non-domestic customers	Document Only	3. Initial Written Assessment	1WD after Authority decision

VII. Modification Trend Chart

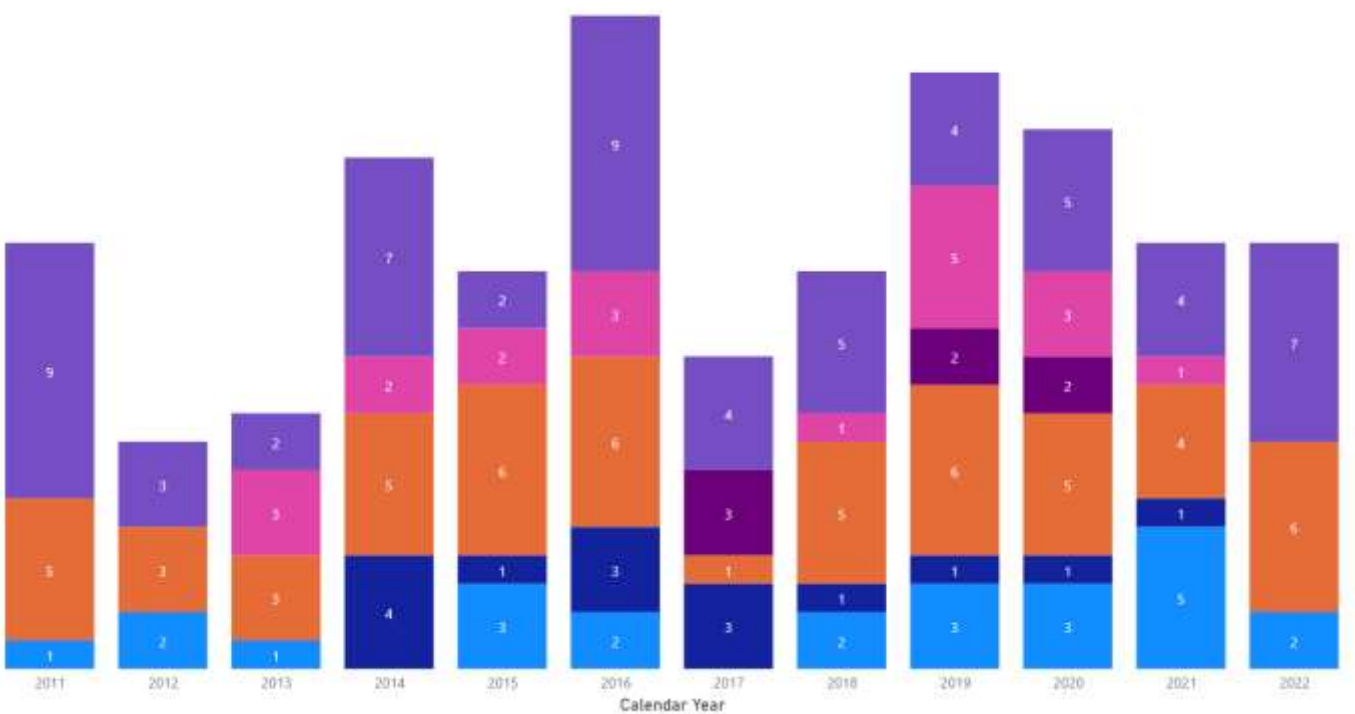
What's driving the raising of Modifications?

Driver: Defect, Europe, Legislation, Legislation (inc. CMA), Ofgem, Other Code, SCR, Strategic Improvement, Workgroup / Committee / Issue, Workgroup/Committee



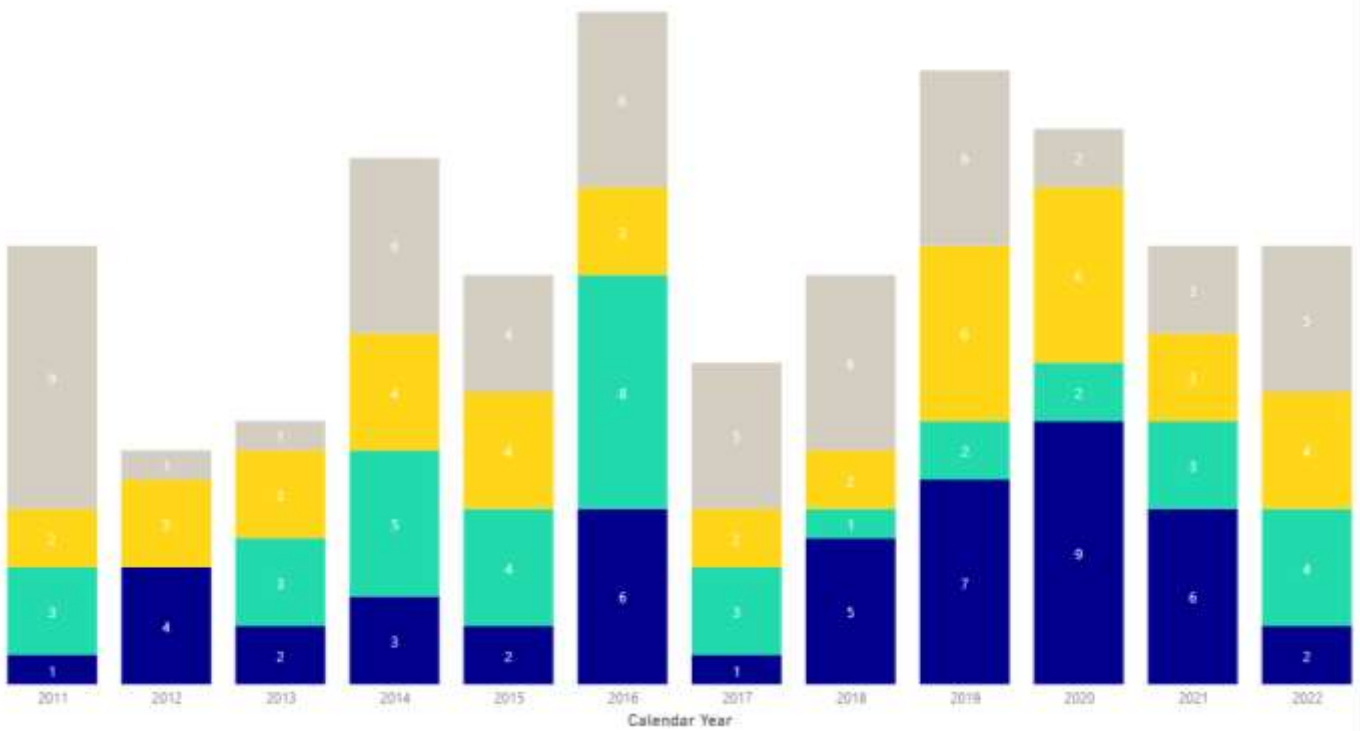
What type of Modifications are being raised?

Category L1: Assurance, Credit, Governance, Registration, Reporting, Settlement



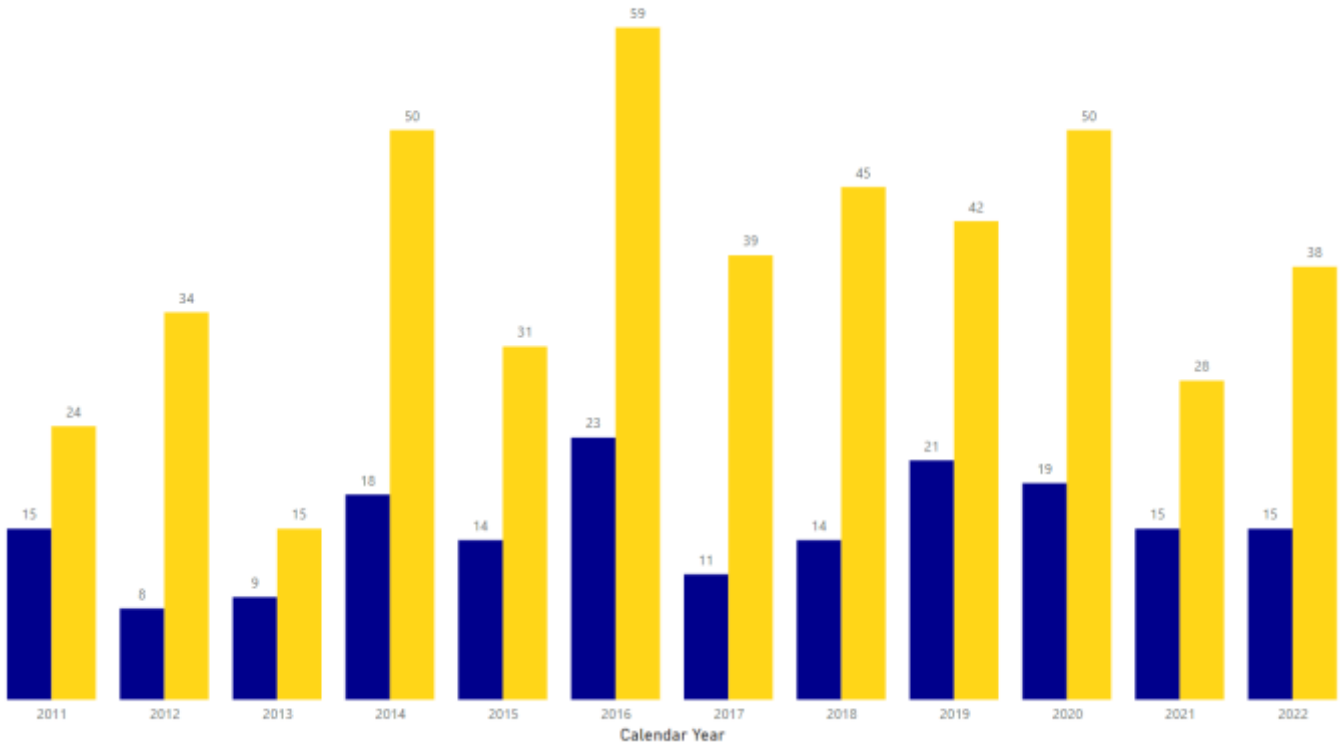
Who is raising Modifications?

Raiser ● BSC Panel ● Incumbents ● National Grid ● Other



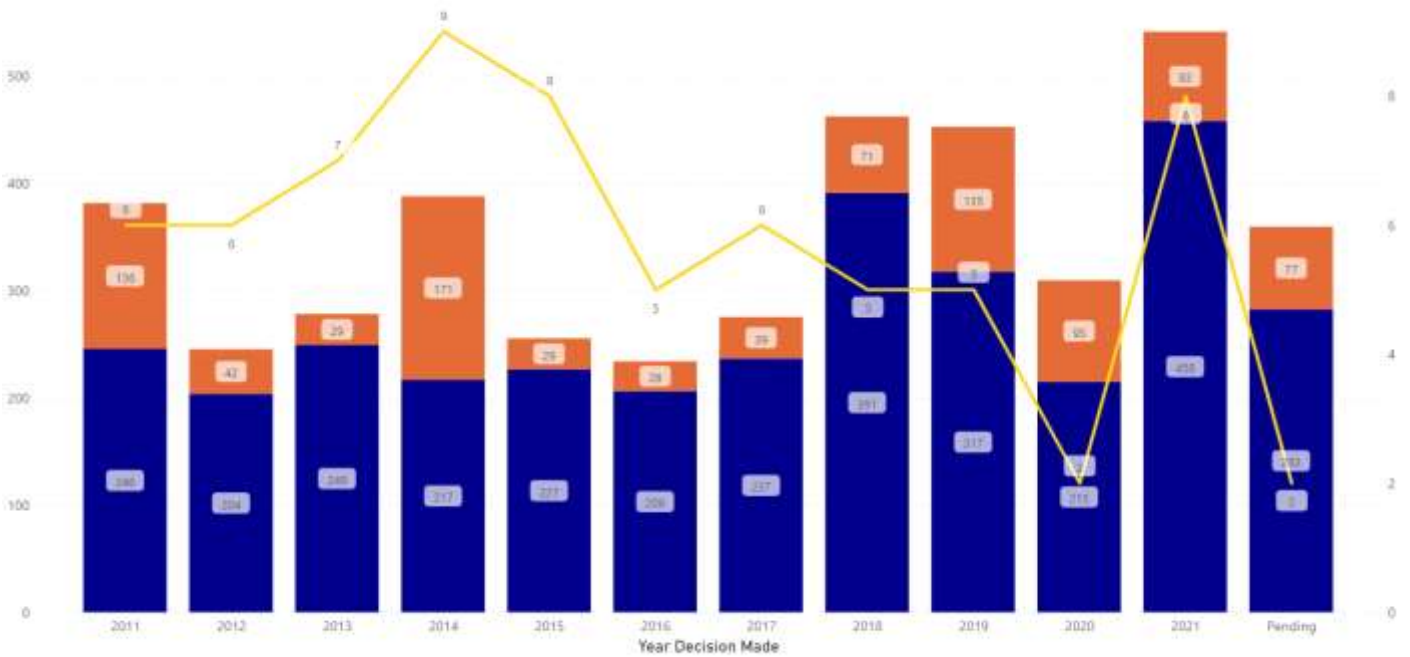
How many Modifications raised and Workgroups held?

● Mods raised ● Workgroups (excl. Issues)



Mean calendar days to send to Ofgem, Mean calendar days for Ofgem to make decision and Count of Mods decided by Year Decision Made

● Mean calendar days to send to Ofgem ● Mean calendar days for Ofgem to make decision ● Count of Mods decided



* excludes Self-Governance, Fast Track Self-Governance, straight to Report Phase and Urgent Modifications

VIII: Recommendations

We invite the Panel to:

- **APPROVE** a four-month extension to the P415 Assessment Procedure;
- **APPROVE** a three-month extension to the P426 Assessment Procedure; and
- **NOTE** the contents of the November 2022 Change Report.

For more information, please contact:

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Appendix A

Key

Stage	Modifications	Change Proposals
Initial Written Assessment	Includes Elexon's Initial Written Assessment of the implications of each Modification Proposal and a recommendation of how the Modification should proceed.	Includes Elexon's Initial Written Assessment of the implications of each Change Proposal to seek Committee(s) initial views and agree the consultation questions.
Assessment Procedure	Workgroups are held to develop and assess the proposal. The Workgroup recommendations are consulted on (Assessment Procedure Consultation), before being submitted to Panel with the Workgroup's recommendations on how to proceed (Assessment Report). The Panel initial views are gathered.	The proposal is consulted on in a Change Proposal Consultation Batch. The relevant Committee(s) then decide(s) whether to approve or reject the Change Proposal.
Report Phase	The Panel's initial views on whether to approve and timescales for implementation are consulted on (Report phase Consultation). The responses to the consultation are then presented to the Panel for their final views (Draft Modification Report). The Panel decide whether to approve or reject the Modification and publish the Final Modification Report. If the Modification cannot be approved under Self-governance, the Final Modification Report is sent to Ofgem for decision.	Not applicable.
Awaiting Decision	Modifications that have been submitted to Ofgem for decision or Modifications that have been decided on by the Panel under Self-Governance arrangements and are still subject to objection by BSC Parties (15 Working days after the Panel's decision).	Not applicable.
Awaiting Implementation	Modifications that have been approved but not yet implemented and details of Modifications that have been rejected or withdrawn.	Change Proposals that have been approved but not yet implemented and Change Proposals that have been rejected.
Rejected / Withdrawn	Modifications that have been rejected by the BSC Panel/ the Authority or withdrawn by the Proposer or the Pane	Change Proposals that have been rejected by the Panel or the relevant Panel sub-Committee.