



Department
of Energy &
Climate Change

EMR: Consultation on Balancing and Settlement Code subsidiary documents

URN: 14D/108 April 2014



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The consultation can be found on DECC's website:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/305436/EMR_Consultation_on_BSC_subsidary_documents.pdf

Published by the Department of Energy and Climate Change

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General information

Purpose of this consultation:

The Government is seeking views on the modifications to Balancing and Settlement Code (BSC) subsidiary documents and other configurable items required as a result of the implementation of Electricity Market Reform. The documents attached to this consultation document set out drafts of the amendments considered necessary to enable the effective delivery of EMR. This consultation is relevant to electricity generators, electricity suppliers, electricity consumers and their representatives, network operators, Ofgem, the EMR delivery body National Grid, ELEXON, environmental and energy efficiency organisations, electricity service companies, the construction sector, financial institutions and other stakeholders with an interest in the energy sector. DECC invites interested parties to submit comments and evidence.

Issued: 8 April 2014

Respond by: 7 May 2014

Enquiries to:

Electricity Market Reform Programme Team

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Email: SecondaryLegislationEMR@decc.gsi.gov.uk

Consultation reference: URN 14D/108 – EMR: Consultation on Balancing and Settlement Code subsidiary documents

Territorial extent:

This consultation applies to England, Scotland and Northern Ireland.

How to respond:

Your response will most useful if it is framed in direct response to the questions posed, though further comments and evidence are also welcome. Electronic responses should be emailed to the above address.

Additional copies:

You may make copies of this document without seeking permission. An electronic version can be found at

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/305436/EMR_Consultation_on_BSC_subsidary_documents.pdf

Other versions of the document in Braille, large print or audio-cassette are available on request. This includes a Welsh version. Please contact us under the above details to request alternative versions.

Confidentiality and data protection:

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 1998 and the Environmental Information Regulations 2004).

If you want information that you provide to be treated as confidential please say so clearly in writing when you send your response to the consultation. It would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.

We will summarise all responses and place this summary on our website at www.decc.gov.uk/en/content/cms/consultations/. This summary will include a list of names or organisations that responded but not people's personal names, addresses or other contact details.

Quality assurance:

This consultation has been carried out in accordance with the Government's Code of Practice on consultation, which can be found here:

<http://www.bis.gov.uk/files/file47158.pdf>

If you have any complaints about the consultation process (as opposed to comments about the issues which are the subject of the consultation) please address them to:

DECC Consultation Co-ordinator

3 Whitehall Place

London SW1A 2AW

Email: consultation.coordinator@decc.gsi.gov.uk

Executive Summary

Overview of Electricity Market Reform (EMR)

1.1 Objectives and Challenges

1. Our electricity market faces major challenges throughout the next decade and beyond. Electricity Market Reform (EMR) creates a framework to transform the UK electricity market to meet these challenges, and will:

- Maintain a secure supply of electricity, despite the closure of around a fifth of our 2011 capacity expected over this decade.
- Enable the UK to meet its ambitious climate and renewable targets to build a cleaner energy future for Britain and the world; and
- Power an increasing electricity demand over the next 40 years as we increasingly turn to electricity for heat and transport.

2. EMR is aimed at incentivising investment in secure, low-carbon electricity generation; not only to meet these challenges, but to improve affordability for consumers. We estimate up to £110 billion of investment is needed in the sector by the end of the decade alone to achieve our objectives.

3. EMR will support a range of forms of low carbon generation and thus diversify our domestic energy supply, helping to improve our energy security and reduce reliance on energy imports. This will help to avoid blackouts, while also protecting consumers against global spikes in fossil fuel prices.

4. Therefore, EMR is a set of arrangements to take us through this transition, working with the existing market to address market failures. It will ensure that the UK remains a leading destination for investment in low carbon electricity – boosting our economy and generating skills, expertise and hundreds of thousands of jobs in the sector.

5. Further information on the objectives and benefits of EMR can be found on the DECC website¹.

1.2 Components of EMR

6. EMR will create two key mechanisms – Contracts for Difference (CfDs) and the Capacity Market (CM). These mechanisms will ensure that low carbon and reliable electricity generation is an attractive investment opportunity. The CfD will provide long-term revenue stabilisation to incentivise investment in low-carbon generation, while the Capacity Market will provide a steady payment to reliable forms of capacity (both demand and supply) to ensure there is enough to meet demand.

7. Underpinning these are measures to encourage and support new entrants into the electricity market, which will give consumers more choice as smaller electricity companies compete alongside established firms. Ofgem is also taking measures to improve wholesale market liquidity² which will facilitate market entry by offering a reliable route to market, enabling increased competition.

8. Alongside the CfD and the CM, the Emissions Performance Standard will provide a regulatory backstop to ensure that any new coal-fired power stations are equipped with Carbon Capture and Storage (CCS). The Carbon Price Floor³ which was implemented in April 2013, gives a clearer signal to the market of our commitment to low carbon electricity.

9. We have also announced measures to aid the reduction of electricity demand and at least £20 million will be made available to pilot Electricity Demand Reduction⁴, expected to begin in summer 2014.

10. Finally – to maintain investor confidence as these reforms are taken forward – the Government has put in place arrangements to support the transition from the current Renewables Obligation to the Contracts for Difference, and to allow for early investment decisions to be made under the FID Enabling process⁵.

¹ <https://www.gov.uk/government/policies/maintaining-uk-energy-security--2/supporting-pages/electricity-market-reform>

² <https://www.ofgem.gov.uk/electricity/wholesale-market/liquidity>

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/42639/consult_carbon_price_support_condoc.pdf

⁴ <https://www.gov.uk/government/policies/reducing-demand-for-energy-from-industry-businesses-and-the-public-sector--2>

⁵ <https://www.gov.uk/government/publications/increasing-certainty-for-investors-in-renewable-electricity-final-investment-decision-enabling-for-renewables>

1.3 Overview of the EMR Framework

11. A number of parties will need to be involved in preparing for EMR implementation:
- **Government** – Sets the policy framework, provides sponsorship, leads design and legislative action.
 - **Ofgem** – Regulates the electricity market, provides design advice, analysis and regulation.
 - **National Grid** – EMR delivery body, administrator of CfD allocation and Capacity Market auction and provides advice to the Government.
 - **CFD Counterparty Company** – Government owned company set up to act as counterparty to CfDs, signing and managing them, and administers the supplier obligation.
 - **CFD Settlement Services Provider** – Subsidiary of ELEXON. Carries out settlement of CfDs on behalf of the CFD Counterparty.
 - **Electricity Settlements Company** – Government owned company that acts as settlement body for the Capacity Market.
 - **CM Settlement Services Provider**⁶ – Subsidiary of ELEXON. Carries out settlement of Capacity Market Agreements on behalf of the CM settlement body.
 - **Devolved Administrations** – Oversees their implementation and monitoring of proposals with DECC.
 - **Generators** – Participants and parties to CfD and Capacity Market agreements and investment contracts under FIDeR.
 - **Electricity Suppliers** – Fund CfD and Capacity Market payments to generators.

⁶ The CFD settlement agent and CM settlement agent (as referred to within previous EMR documents) have been named the CFD Settlement Services Provider and CM Settlement Services Provider.

1.4 How EMR will be implemented

12. Measures for EMR are set out within the Energy Act 2013⁷. This Act provides the Secretary of State with powers to enact the changes to the electricity market to meet the challenges set out above. This includes supporting investment through the Contracts for Difference and the Capacity Market, and associated measures to support these mechanisms.

13. As a consequence of the provisions in the Energy Act 2013 to implement EMR, existing electricity licences, industry codes and related agreements and documents will require consequential amendments to meet the needs of these reforms. The Government consulted on these changes in January 2014 and is currently considering the responses. The modifications proposed in this consultation are consequential to the modifications proposed in the January 2014 consultation. These modifications will be made in addition to the rules and regulations as set out in the October 2013 consultation on policy proposals for implementation.

1.5 Powers to modify industry codes, agreements and licences

14. Sections 26 and 37 of the Energy Act 2013 include provisions for the Secretary of State to modify licence conditions and documents maintained under licence conditions, together with related agreements, for the purpose of giving effect to the EMR mechanisms.

15. Government has been working with its delivery partners Ofgem, National Grid and ELEXON, along with relevant code administrators, to assess which existing industry documents may need consequential amendments. The drafts of these changes are being published for consultation in this document.

16. Following this consultation the proposed consequential changes will be progressed through the prescribed modification processes⁸, in order to ensure consistency of approach and consideration of the effects of changes.

17. It should be noted that following review of the responses we receive in relation to the detailed consultation on draft policy proposals for EMR implementation and the finalisation of the EMR documents, additional consequential amendments may be required (i.e. any amendments related to the development of PPA policy⁹) or the amendments set out in this consultation may need to be revised.

⁷ <http://www.legislation.gov.uk/ukpga/2013/32/contents/enacted>

⁸ The responses to this consultation will be analysed and considered. Following this, the industry document modifications will then be finalised. Then, where necessary, it is intended for the modifications to be laid in Parliament alongside the EMR Secondary Legislation in summer 2014.

⁹PPAs: Power Purchase Agreements. Any amendments to code and licences as a result of PPA policy will be considered following the forthcoming Government consultation on Route to Markets.

18. This consultation requests that respondents assess the proposed modifications to the Balancing and Settlement Code subsidiary documents and other configurable items and whether the proposed changes will enable current EMR policy to be implemented successfully.

Consequential modifications to Balancing and Settlement Code subsidiary documents

2.1 Explanation of industry codes and other documents

19. To implement EMR legislation successfully, once EMR secondary regulations have been agreed by Parliament and are in force, the changes set out in those regulations will need to be integrated within the appropriate existing industry codes and related documents and agreements.

20. Industry codes, and related documents and agreements, which underpin the electricity markets, will require modifying. Section 2.2 highlights the BSC subsidiary documents and configurable items changes suggested within this consultation.

2.2 Balancing and Settlement Code subsidiary documents and configurable items

21. The Balancing and Settlement Code (BSC) contains the governance arrangements for electricity balancing and settlement in Great Britain. The BSC is administered by ELEXON. All proposed modifications to BSC subsidiary documents and configurable items are further outlined in the attached Annexes (A-M).

2.2.1. Proposed changes

22. BSC subsidiary documents and configurable items will be modified by the Secretary of State using the powers laid out in the Energy Act 2013. The documents that will be modified are:

i. BSCP11: Trading Disputes (Annex A)

23. This BSC Procedure (BSCP)¹⁰ deals with the raising, resolution and rectification of all Trading Disputes, in accordance with Section W of the Balancing and Settlement Code.

24. The proposed modifications to this document include provisions which reflect the need for the Counterparty Company and Electricity Settlements Company to be notified of BSC

¹⁰ Balancing and Settlement Code Procedures (BSCPs) - BSCPs define the relationships, timescales and interactions between participants and specify the information or other outputs to be exchanged between them.

Trading Disputes so that they can take any necessary action, for example with the CfD metering breach process.

BSCP11: Trading Disputes

- | | |
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| 1. | Do you agree with the proposed modifications to the BSC Procedure 11? If not, please explain why, and what alternatives would you suggest? |
|----|--|

ii. **BSCP15: Balancing Mechanism (BM) Unit registration** (Annex B)

25. This BSCP defines the key interfaces, interdependencies and timetable for the registration and de-registration of BM Units by Lead Parties.

26. The proposed modification to this document reflects the CfD and CM metering policies. It allows BSCCo to register Additional BM Units on behalf of suppliers. The proposed changes require that Additional BM Units registered for EMR follow a new naming convention. The naming convention can be found on ELEXON's website in EMR Circular 2¹¹. Suppliers may find themselves with an Additional BM Unit that complies with the new naming convention, without having registered it themselves. It asks the CfD Settlement Services Provider and CM Settlement Services Provider to confirm that Additional BM units registered for EMR are needed to support the proposed exclusion of the existing BSC charge of £100 per month for Additional BM Units. It also requires BSCCo to maintain a list of suppliers that require an Additional BM Unit to be registered for EMR under certain conditions.

BSCP15: Balancing Mechanism (BM) Unit registration

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| 2. | Do you agree with the proposed modifications to BSC Procedure 15? If not, please explain why and what alternatives would you suggest? |
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iii. **BSCP27: Technical Assurance of Half Hourly Metering Systems for Settlement Purpose** (Annex C)

27. This BSCP defines the process of inspections of Supplier Volume Allocation (SVA) Half Hourly Metering Systems registered in a Supplier Meter Registration System (SMRS) and Central Volume Allocation (CVA) Metering Systems registered in the Central Meter Registration Service (CMRS). It describes the key interfaces and timetable responsibilities for the role of the Technical Assurance Agent (TAA) and interested parties in the inspection of Metering Systems.

¹¹ <http://www.elexon.co.uk/reference/electricity-market-reform/>

28. The proposed modification to this document reflects the need for the CFD Counterparty Company and Electricity Settlements Company to be notified of BSC metering non-compliances so that they can take any necessary action.

BSCP27: Technical Assurance of Half Hourly Metering Systems for Settlement Purpose

3.	Do you agree with the proposed modifications to the BSC Procedure 27? If not, please explain why, and what alternatives would you suggest?
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iv. BSCP503: Half Hourly Data Aggregation For SVA Metering Systems Registered In SMRS (Annex D)

29. This BSC Procedure defines the processes that the Half Hourly Data Aggregator (HHDA) shall use for data aggregation for SVA Metering Systems with Half Hourly (HH) SVA Metering Equipment. This BSC Procedure focuses on the interfaces between the HHDA and other Agencies seen from the perspective of the HHDA.

30. This modification reflects the Government's Capacity Market metering policy. The DSR capacity provider must notify its Supplier, who will instruct its Half Hourly Data Aggregator to pass the half hourly, non-aggregated BSC metered data adjusted for Line Losses for the relevant CMU component to the CM Settlement Services Provider.

BSCP503: Half Hourly Data Aggregation For SVA Metering Systems Registered In SMRS

4.	Do you agree with the proposed modifications to the BSC Procedure 503? If not, please explain why, and what alternatives would you suggest?
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v. BSCP508: Supplier Volume Allocation Agent (Annex E)

31. This BSC Procedure defines those activities which enable the Supplier Volume Allocation Agent (SVAA) to fulfil its functions. The primary role of the SVAA is to aggregate metered data from HHDA's to determine the total metered volumes for each Supplier over each Half Hour of the day.

32. The proposed modifications support the provision of data to the CfD Settlement Services Provider and the CM Settlement Services Provider. This reflects the provision of data from SVAA to the SAA for the calculation of CfD Supplier volumes.

BSCP508: Supplier Volume Allocation Agent

5.	Do you agree with the proposed modifications to the BSC Procedure 508? If not, please explain why, and what alternatives would you suggest?
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vi. BSCP509: Changes To Market Domain Data (Annex F)

32. The purpose of this BSC Procedure (BSCP) is to ensure that all changes to Market Domain Data (MDD) within the Supplier Volume Allocation (SVA) arrangements are made in an auditable and controlled manner and where appropriate with due consultation with the affected parties. MDD refers to those items of data that are required to be passed from one party to another by the Supplier Volume Allocation Agent (SVAA).

33. The proposed modifications reflect the CfD and CM metering policy. It allows BSCCo to register Additional BM Units in the Market Domain Database.

BSCP509: Changes To Market Domain Data

6.	Do you agree with the proposed modifications to the BSC Procedure 509? If not, please explain why, and what alternatives would you suggest?
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vii. Settlement Administration Agent (SAA) Service Description (Annex G)

34. The purpose of this Service Description¹² is to describe the responsibilities and obligations of the SAA for the calculation of and provision of reports to the Funds Administration Agent, BSCCo and BSC Trading Parties detailing monies owed and owing as a result of BM actions and the settlement of imbalances. The Service Description describes the interfaces between the SAA, and the BSC Trading Party and other BSC Agents. It also implements the relevant provisions detailed in section T (Settlement and Trading Charges) of the Balancing and Settlement Code.

¹² The BSC Service Descriptions describe the service to be provided by the BSC Agents. As a general rule, there is one BSC Service Description for each BSC Agent. The exception to this rule is for the Technical Assurance Agent (TAA) which has two, one for SVA and one for CVA.

35. The proposed modifications support the provision of data to the CFD Settlement Services Provider and CM Settlement Services Provider. This supports the SAA's new role in collating CVA and SVA gross demand volumes and adjusting them for transmission losses. It also supports the provision of the SAA-I014 sub-flow 2 settlement report to the CfD Settlement Services Provider and the CM Settlement Services Provider.

Settlement Administration Agent (SAA) Service Description

7.	Do you agree with the proposed modifications to the SAA Service Description? If not, please explain why, and what alternatives would you suggest?
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viii. Supplier Volume Allocation(SVA) Data Catalogue Volume 1 & Volume 2¹³ (Annexes H and I)

36. This document defines the interfaces required by the ELEXON-delivered or certified applications and BSC Procedures, for communications between SVA data parties. It forms part of the "SVA Data Catalogue" as defined in Section O of the BSC.

37. This proposed modification supports the provision of data to the CfD Settlement Services Provider and the CM Settlement Services Provider. SVA Data Catalogue 1 details the new data flow to send SVA gross Supplier volumes from the Supplier Volume Allocation Agent (SVAA) to SAA. SVA Data Catalogue 2 details the new data items to send SVA gross Supplier volumes from the Supplier Volume Allocation Agent (SVAA) to SAA.

Supplier Volume Allocation(SVA) Data Catalogue Volume 1 & Volume 2

8.	Do you agree with the proposed modifications to the SVA Data Catalogue Volume 1 and Volume 2? If not, please explain why, and what alternatives would you suggest?
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ix. NETA Interface Definition and Design (IDD) Part 1 (Annex J)

38. This document is Part 1 of the Interface Definition and Design¹⁴. The scope of the document is, for each BSC Central System provided, the definition and design of all interfaces

¹³ This is a Business Definitions Document, which comprises details of the Communications Requirements for sending or receiving Communications between Parties and BSC Agents, and the Reporting Catalogue for both SVA and CVA reporting. The Reporting Catalogues set out the data items to be contained in each of the reports mentioned in BSC Section V.

¹⁴ The IDD Part 1 and Part 2 documents list both fully-automated electronic interfaces and other partially-automated or manual interfaces; the spread sheets list the fully-automated electronic interfaces.

between the BSC Central System and other Systems. The scope of Part 1 is limited to the definition and design of interfaces between the BSC Service System and the BSC Parties and their Agents.

39. The proposed modifications support the provision of data to the CfD Settlement Services Provider and the CM Settlement Services Provider. It shows the CfD Settlement Services Provider and the CM Settlement Services Provider as recipients of the SAA-I014 sub-flow 2 Settlement Report. It also defines the new data flow between the SAA and the CfD Settlement Services Provider and the CM Settlement Services Provider for the loss-adjusted gross demand volumes for Suppliers.

NETA Interface Definition and Design (IDD) Part 1

9.	Do you agree with the proposed modifications to the NETA Interface Definition and Design Part 1? If not, please explain why, and what alternatives would you suggest?
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x. NETA Interface Definition and Design (IDD) Part 2 (Annex K)

40. This document is Part 2 of the Interface Definition and Design. The scope of the document is, for each BSC Central System provided, the definition and design of all interfaces between the BSC Central System and other Systems. The scope of Part 2 is limited to the definition and design of all interfaces with the BSC Central System which do not involve BSC Parties and their Agents. It covers intra-BSC Systems flows and flows for NG and BSCCo.

41. This supports the provision of data to the CfD Settlement Services Provider and the CM Settlement Services Provider. It details the new flow containing the gross SVA demand report received from the SVAA.

NETA Interface Definition and Design (IDD) Part 2

10.	Do you agree with the proposed modifications to the NETA Interface Definition and Design Part 2? If not, why, and what alternatives would you suggest?
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xi. Supplier Volume Allocation Agent (SVAA) User Requirements Specifications (URS) (Annexes L and M)

42. This document describes the requirements for a system which supports the initial volume allocation and subsequent reconciliation between Suppliers, by adjusting Suppliers' energy volumes as meter data becomes available to replace estimates used in Initial Settlement. The document comprises a statement of the high level principles and the

objectives of the Initial Settlement and Reconciliation Agency system, now known as the SVAA system, a summary of the constraints and assumptions on which the URS is based, a description of the scope and functions covered by the UR, the detailed requirements for the Initial Settlement and Reconciliation Agency system, and supporting information, including the Required Data Flow Model, Logical Data Model, Data Catalogue, Function Descriptions, System Event Descriptions, and User Roles.

43. It also provides a specification of the requirements for the Settlement Administration Agent (SAA) Service within the BSC Services Agreement. The requirements are described from the point of view of the SAA Service users.

44. The proposed modifications to these documents support the provision of data to the CfD Settlement Services Provider and the CM Settlement Services Provider.

Supplier Volume Allocation Agent (SVAA) User Requirement Specifications (URS)

11.	Do you agree with the proposed modifications to the Supplier Volume Allocation Agent User Requirements Specifications (URS)? If not, please explain why, and what alternatives would you suggest?
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Timeline for EMR implementation and consequential changes to industry code, licence, industry agreements and other documents

45. Following the closure of this consultation on 7 May 2014 Government and its delivery partners will analyse responses and finalise the proposed code modifications.

46. Government intends to publish a response to this consultation in the summer alongside the response to the October 2013 EMR consultation and January 2014 consultation on industry code and licence changes; and plans for the modifications to come into effect and at the same time as the implementing EMR secondary legislation – enabling EMR to be operational.

Forward EMR programme timetable:

47. In early April we will publish the draft CfD allocation framework, with an opportunity for stakeholders to comment on the rules for managing the CfD budget and allocation process.

48. Between now and June, DECC plans to publish for consultation further detail of:

- The treatment of individual technologies, including detailed proposals for the application of technology specific minima or maxima, if any;
- An update on interactions between budgets within the Levy Control Framework (LCF) based upon our understanding of the pipeline of renewables projects, State Aid developments and actions we may need to take to ensure that we stay within the LCF cap.

49. DECC plans to lay secondary legislation in Parliament in the Summer, which will include the final Capacity Market Regulations. The CfD allocation framework is expected to be published alongside the laying of secondary legislation.

Before Summer Recess:

- Informal auction guidelines and Capacity Market parameters will be published by National Grid;
- DECC will confirm any further remaining details of the CfD auction;
- Subject to the will of Parliament, secondary legislation will be passed in July 2014.

This Autumn:

- The final CfD Budget to be released to National Grid for allocation;
- The application process for CfD will open and allocation is expected to begin.

Late 2014/early 2015

- First contracts under the enduring regime will be awarded;
- First capacity auction for delivery of capacity in winter 2018-2019 (subject to state aid approval).

Catalogue of consultation questions

BSCP11: Trading Disputes

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| 1. | Do you agree with the proposed modifications to the BSC Procedure 11? If not, please explain why, and what alternatives would you suggest? |
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BSCP15: Balancing Mechanism (BM) Unit registration

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| 2. | Do you agree with the proposed modifications to BSC Procedure 15? If not, please explain why and what alternatives would you suggest? |
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BSCP27: Technical Assurance of Half Hourly Metering Systems for Settlement Purpose

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| 3. | Do you agree with the proposed modifications to the BSC Procedure 27? If not, please explain why, and what alternatives would you suggest? |
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BSCP503: Half Hourly Data Aggregation For SVA Metering Systems Registered In SMRS

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| 4. | Do you agree with the proposed modifications to the BSC Procedure 503? If not, please explain why, and what alternatives would you suggest? |
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BSCP508: Supplier Volume Allocation Agent

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| 5. | Do you agree with the proposed modifications to the BSC Procedure 508? If not, please explain why, and what alternatives would you suggest? |
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BSCP509: Changes To Market Domain Data

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| 6. | Do you agree with the proposed modifications to the BSC Procedure 509? If not, please explain why, and what alternatives would you suggest? |
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Settlement Administration Agent (SAA) Service Description

7. Do you agree with the proposed modifications to the SAA Service Description? If not, please explain why, and what alternatives would you suggest?

Supplier Volume Allocation(SVA) Data Catalogue Volume 1 & Volume 2

8. Do you agree with the proposed modifications to the SVA Data Catalogue Volume 1 and Volume 2? If not, please explain why, and what alternatives would you suggest?

NETA Interface Definition and Design (IDD) Part 1

9. Do you agree with the proposed modifications to the NETA Interface Definition and Design Part 1? If not, please explain why, and what alternatives would you suggest?

NETA Interface Definition and Design (IDD) Part 2

10. Do you agree with the proposed modifications to the NETA Interface Definition and Design Part 2? If not, please explain why, and what alternatives would you suggest?

Supplier Volume Allocation Agent (SVAA) User Requirements Specifications (URS)

11. Do you agree with the proposed modifications to the Supplier Volume Allocation Agent User Requirements Specifications (URS)? If not, please explain why, and what alternatives would you suggest?

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