ELEXON

1 Publication and Implementation Dates

1.1

1.1.1 The *Publish Date* and the *Implementation Date* for this Governance Document are as follows:

Term	Date
Publish Date	12 December 2025
Implementation Date	12 December 2025

1.1.2 The *Publish Date* and *Implementation Date* form part of the legal baseline for this Governance Document and shall be taken as the effective dates for the purposes of interpretation and version control.

1.1.3 In the event of any discrepancy between the dates stated above and those referenced in any accompanying publication, metadata, or communication, the dates recorded in this Governance Document shall prevail.

1.1.4 For the avoidance of doubt, the *Implementation Date* represents the date on which the obligations, rights, and procedures set out in this Governance Document take operational effect.

2 Introduction

2.1 Purpose

2.1.1 The purpose of this document is to provide a clear and transparent framework for how changes to the *Market Facilitator Rules* are to be raised, assessed, decided and implemented.

2.1.2 It sets out the end-to-end process for progressing *Change Proposals* and *Issues*, including the criteria against which they are evaluated (the *Change Objectives*), the roles and responsibilities of the *Market Facilitator*, *System Operators*, and *Interested Persons*, and the mechanisms for consultation and decision-making. By defining these procedures, the document ensures that changes are managed in a consistent, efficient, and fair manner, while safeguarding the integrity and objectives of the *Market Facilitator Arrangements*.

2.2 Scope

2.2.1 This document has been developed in accordance with, and is subject to, the *Market Facilitator Governance Framework Document* (the "*Governance Framework Document*"), as published and designated by the *Authority* from time to time.

2.2.2 This document applies to all changes to the *Market Facilitator Rules*, including the creation of new *Market Facilitator* Documents and/or *Flexibility Market Rules* and the amendment or removal of existing ones.

2.2.3 The scope includes the roles and responsibilities of the *Market Facilitator*, *System Operators*, *Interested Persons*, the *Authority* and the *Stakeholder Advisory Board* (*SAB*).

2.3 Out of scope

2.3.1 This document does not cover changes to wider *Industry Codes*, legislation, licences or frameworks.

2.3.2 While a *Change Proposal* may result in *System Operators* or other market participants needing to make changes to their own systems or processes, the management and implementation of such changes by those parties are not governed by this procedure.

2.3.3 Changes to the *Market Facilitator*'s budget, funding arrangements, and the associated appeal process are also outside the scope of this document.

2.4 Main Users of this procedure and their responsibilities

2.4.1 The main users of this procedure are:

(a) ***Market Facilitator*** – responsible for managing this *Change Management Procedure*; determining whether a *Change Proposal* should be treated as urgent (where requested); prioritising *Change Proposals* and *Issues* (where necessary); supporting *Proposers* and *Alternative Proposers* in developing their solutions; and determining whether to approve or reject *Change Proposals*, subject to appeal to the *Authority*.

(b) ***SAB*** – provides guidance and advice on *Change Proposals*, including on the Change Prioritisation, *Progression Route* and *Progression Plan*, and other matters to be considered and assessed; and recommends whether *Change Proposals* should be approved or rejected.

(c) **The *Authority*** – decides on appeals relating to *Market Facilitator* decisions on *Change Proposal* and appeals concerning the inclusion or exclusion of *Alternative Solutions*.

(d) ***Interested Persons*** – responsible for raising *Issues* or *Change Proposals*, providing information and feedback during consultations, and constructively engaging in this *Change Management Procedure*.

(e) ***National Energy System Operator* (*NESO*) and *Distribution Network Operators* (*DNOs*)** – in addition to the responsibilities of an *Interested Person*, they may also be required to provide details of the impact of a *Change Proposal* on their organisation through the IA process.

3 Changing the Market Facilitator Rules

3.1 Change Proposals

3.1.1 A *Change Proposal* (CP) is a formal request to amend, create, or remove any part of the *Market Facilitator Rules*. It sets out the *issue* or defect to be addressed, the rationale for change, and the *Proposed Solution* (including any *Alternative Solutions*, where applicable). A *Change Proposal* must contain sufficient information to allow the *Market Facilitator* and stakeholders to assess its impacts, consider its alignment with the *Change Objectives*, and determine whether it should be approved or rejected.

3.2 Withdrawing a Change Proposal

3.2.1 A *Proposer* or *Alternative Proposer* may withdraw support for their *Proposed Solution* or *Alternative Solution* at any time before the publication of the *Assessment Report*, by notifying the *Market Facilitator* in writing and providing the reasons for withdrawal.

3.2.2 Upon receipt of such notice, or where the *Proposer* or *Alternative Proposer* has become unresponsive, the *Market Facilitator* shall, as soon as reasonably practicable, notify via the *Change Mailing List*, that the *Proposer* and/or *Alternative Proposer* has withdrawn support. The date on which this notification is sent shall mark the opening of a 15 *Working Day* adoption window. In that notification, the *Market Facilitator* shall invite *Interested Persons* to adopt the *Proposed Solution* or any *Alternative Solutions*.

3.2.3 Any adoption shall be on a first-come, first-served basis as notified by the *Market Facilitator*.

3.2.4 The *Market Facilitator* may itself choose to adopt any withdrawn *Proposed Solution* or withdrawn *Alternative Solutions*.

3.2.5 Where the *Proposed Solution* and all *Alternative Solutions* are withdrawn, and no adoption takes place, the *Change Proposal* shall be treated as withdrawn and shall be closed upon the expiry of the adoption window.

3.2.6 If the *Market Facilitator* receives notice from an *Interested Person* willing to adopt the *Proposed Solution* or any *Alternative Solution*, that *Interested Person* shall become the *Proposer* for the *Proposed Solution* or the *Alternative Proposer* for the *Alternative Solution*, as applicable.

3.2.7 The *Market Facilitator* shall update the *Change Register* to reflect the new *Proposer* and/or *Alternative Proposer* and notify its *Change Mailing List*.

3.3 Issues

3.3.1 Where an *Interested Person* identifies an *issue*, problem, defect, or potential improvement with the *Market Facilitator Rules* but is unsure how or whether to progress the concern, or wishes to explore possible solution options, an *Issue* should be raised. This pre-change process is intended to assist in framing the *issue*(s) or defect(s) and identifying potential CPs. It may also be used to help explore *Delivery Plan* Change Opportunities, for example.

3.4 Change prioritisation

3.4.1 Where necessary, the *Market Facilitator* shall prioritise *Change Proposals* and *Issues* in accordance with the following criteria, and shall take into account the views of the *Proposer* when applying those criteria:

(a) Alignment with the *Delivery Plan* objectives – includes being able to demonstrate a link to the *Delivery Plan*;

(b) Implementation costs – considering the cost and feasibility of implementing the *Change Proposal*, including the likely implications for stakeholders (e.g., process changes, potential system impacts, cross-code changes, and industry resource requirements such as *workgroup* meetings);

(c) Importance – includes the perceived value, criticality, and risks to industry and consumers (e.g., interactions with, or enabling of,

financial, regulatory, licence, or compliance obligations; cost implications for stakeholders), taking account of any written guidance provided by the *Authority*; and

(d) Time-sensitivity – includes cases where *Change Proposals* require expedited consideration. Complexity, importance, and implementation timescales shall all be factors in assessing time-sensitivity.

3.4.2 Prioritisation shall determine the pace at which *Change Proposals* and *Issues* are progressed. Each *Change Proposal* or *Issue* shall be assigned one of the following priority categorised:

(a) **Low priority** – *Change Proposals* or *Issues* that will be parked and considered in subsequent Delivery Periods;

(b) **Standard priority** – *Change Proposals* or *Issues* to be progressed in accordance with standard timelines and resourcing; or

(c) **High priority** – *Change Proposals* or *Issues* requiring accelerated assessment and delivery.

3.4.3 The *Market Facilitator* shall consult the *SAB* on its prioritisation, providing its rationale, and keep the prioritisation assessment under review at least bi-annually.

3.4.4 The *Market Facilitator* shall publish its prioritisation, including its assessment against the *Prioritisation Criteria*, on the *Elexon Website* and shall inform the *Proposer* of the outcome of that prioritisation.

3.4.5 The *Market Facilitator* shall inform each *Proposer* of the prioritisation of their CP or *Issue*. Progressions Plans shall be developed in accordance with the priority categorisation determined under paragraph 3.4.2 for each CP or *Issue*.

3.5 Validation Criteria

3.5.1 The *Market Facilitator* shall refuse submission of an *Issue* or *Change Proposal* where:

(a) The *Proposal Form* is incomplete or insufficiently clear, including their interest in raising the *Change Proposal* or *Issue*;

(b) The subject matter is materially the same as, or could reasonably form part of, an existing open *Change Proposal* or *Issue*, or is substantially similar to a *Change Proposal* or *Issue* rejected within the last six months;

(c) The *Change Proposal* or *Issue* concerns matters outside the scope of the *Market Facilitator Arrangements*;

(d) The *Proposed Solution* does not address the *issue* or defect described; or

(e) The information provided is insubstantial or frivolous.

3.6 Change Objectives

3.6.1 The following *Change Objectives* shall guide the *Market Facilitator* in deciding whether to approve or reject a *Proposed Solution* or any *Alternative Solutions*. Before making a decision, the *Market Facilitator* must assess whether the *Proposed Solution* or any *Alternative Solutions* better facilitate these *Change Objectives* compared to the current baseline.

3.6.2 The *Change Objectives* shall also be applicable when developing and evaluating *Alternative Solutions*.

3.6.3 The *Change Objectives* are to:

(a) Reduce barriers to entry and participation in *Flexibility Markets*;

(b) Promote efficient, economic, coordinated and transparent operation of *Flexibility Markets*;

(c) Encourage competition at any stage of the *flexibility* process, including procurement, operations and reporting;

(d) Facilitate and ensure compliance with relevant legally binding decisions, guidance or legislation, including but not limited to the *Electricity Balancing Guideline* (*EBGL*), and related licence conditions of *System Operators*;

(e) Deliver benefits to both current and future consumers and the environment; and

(f) Enhance efficiency in the implementation and administration of the *Market Facilitator Arrangements*.

3.7 Role of the Proposer

3.7.1 To be recognised as a *Proposer*, an *Interested Person* (other than the *Authority*, the *National Energy System Operator* (*NESO*), *Distribution Network Operators* (*DNOs*), *BSC* Parties, or the *Market Facilitator*) must, when submitting a *Change Proposal* or *Issue*, provide a brief statement explaining the nature of their interest in the *Market Facilitator Arrangements*. The *Authority*, *NESO*, *DNOs*, *BSC* Parties, and the *Market Facilitator* shall be deemed to have a legitimate interest in the *Market Facilitator Arrangements* for the purposes of acting as a *Proposer*. An *Interested Person* shall only be eligible to act as a *Proposer* where they can demonstrate such an interest.

3.7.2 The *Proposer* shall retain ownership of their *Proposed Solution*. Accordingly, only the *Proposer*, or a person formally delegated by them, may determine the final form of that *Proposed Solution* prior to its submission for decision in the *Decision Phase*. The implementation of the *Proposed Solution* shall remain subject to the outcome of the *Change Proposal* process, the decision of the *Market Facilitator*, or any subsequent appeal process. The same provisions shall apply to an *Alternative Proposer* in respect of any *Alternative Solution*.

3.8 Alternative Solutions

3.8.1 Any *Interested Person*, including the *Market Facilitator*, shall have the right to raise an *Alternative Solution*, that must address the *issue* or defect identified in the *Proposal Form*.

3.8.2 To formally submit an *Alternative Solution*, the *Interested Person* must complete the relevant parts of the *Proposal Form*.

3.8.3 Each *Alternative Solution* shall remain owned by the person that formally submitted it, the *Alternative Proposer*. Accordingly, only the *Alternative Proposer*, or a person formally delegated by them, may determine the final form of that *Alternative Solution* prior to its submission for decision to the *Market Facilitator*.

3.8.4 No more than three *Alternative Solutions*, in addition to the *Proposer*'s *Proposed Solution*, may be raised.

3.8.5 If more than three *Alternative Solutions* are submitted, the *Market Facilitator* shall determine which three to progress, taking into account:

(a) an assessment of the costs and benefits, so far as is possible and reasonable;

(b) an assessment of the solution against the *Change Objectives*; and

(c) the advice of the *SAB*.

3.8.6 If the *Alternative Proposer* of an excluded *Alternative Solution* disagrees with the *Market Facilitator*'s decision, and the *SAB* also supported the excluded *Alternative Solution*, the *Alternative Proposer* shall have the right to appeal to the *Authority*.

3.8.7 Appeals on an *Alternative Solution* shall be made in writing to the *Authority* in accordance with the timescales, criteria and process set out in the *Governance Framework Document* following the *Market Facilitator* notifying its decision, via the *Change Mailing List*, that it has rejected one or more *Alternative Solutions* against the recommendation of the *SAB*.

3.8.8 *Alternative Solutions* must meet the *Validation Criteria* and be demonstrably better than the *Proposed Solution* when assessed against

the *Change Objectives*.

3.8.9 *Alternative Solutions* shall be assessed and developed in the same way as the *Proposed Solution*.

3.8.10 *Workgroups* shall not own *Alternative Solutions*, although Members of a *Workgroup* may raise an *Alternative Solution* in their own right.

3.9 Establishing a Workgroup

3.9.1 The *Market Facilitator* may establish a *Workgroup* for a specific *Change Proposal* or to assess multiple *Change Proposals*, where the subject matter falls within a particular area of expertise.

3.9.2 Each *Workgroup* shall normally comprise at least five *Workgroup Members* (including the *Proposer*), selected by the *Market Facilitator* based on relevant expertise and/or experience required for the assessment of a *Change Proposal*(s).

3.9.3 The *Market Facilitator* shall provide a *Workgroup Chair*, responsible for facilitating discussions and ensuring the *Workgroup* discharges its Terms of Reference, and a *Technical Secretary* who shall record the key discussions, actions, and decisions of the *Workgroup*.

3.9.4 The *Market Facilitator* may limit the number of *Workgroup Members* in a *Workgroup* where the necessary expertise is already present and where there is concern that additional members could hinder the timely progression of the *Workgroup*'s activities.

3.9.5 *Workgroups* shall operate in accordance with the *Workgroup Terms of Reference* set by the *Market Facilitator*. The *Market Facilitator* may amend the *Workgroup Terms of Reference* from time to time, and may consult with the *SAB*. Each *Workgroup Terms of Reference* shall specify the *Change Proposal Terms of Reference* that the *Workgroup* is required to address.

3.9.6 The *Proposer* may appoint a representative to the *Workgroup*, who shall hold the *Proposer*'s responsibility for the duration of the *Workgroup*'s activities.

3.9.7 Each *Workgroup Member* shall:

(a) Confirm in writing to the *Market Facilitator* that their employer has agreed to their participation in meetings and to undertake any additional work outside of meetings; and

(b) Confirm in writing to the *Market Facilitator* that they shall act impartially and in the interests of the *Market Facilitator Arrangements* as a whole, and not promote the interests of their employer or of any specific person or class of persons.

3.9.8 The *Market Facilitator* may add *Workgroup Members* to the *Workgroup* as required during its course or invite attendees.

3.9.9 The *Market Facilitator* may remove or replace any *Workgroup Member* at any time, where it considers that the Member is unwilling or unable to fulfil their duties under the *Workgroup Terms of Reference*, or is deliberately or repeatedly disrupting the work of the *Workgroup*. The *Market Facilitator* shall notify the affected Member, stating its reasons.

3.9.10 *Workgroup Members* shall not be remunerated for their participation but may claim reasonable expenses incurred in the course of discharging their duties.

3.9.11 The *Market Facilitator* shall provide appropriate facilities, people, and support to each *Workgroup* to enable it to function effectively. It is expected that most *Workgroup* meetings shall be held virtually and shall only meet in person where necessary.

3.9.12 The *Market Facilitator* shall ensure that non-confidential details of the *Workgroup Members*, *Workgroup Terms of Reference*, *Change*

Proposal Terms of Reference, and the timetable of meetings are published on the *Elexon Website* as soon as reasonably practicable.

3.10 Setting the Implementation Date

3.10.1 The *Market Facilitator* shall set the *Implementation Date* for a *Change Proposal* in line with, but not limited to, the following considerations:

(a) the *Delivery Plan*;

(b) the complexity and urgency of the *Change Proposal*;

(c) evidence gathered during the *Assess Phase*, including the information collected from any IA, *Assessment Consultation*, and advise provide by the *SAB* or a *Workgroup*, where applicable;

(d) the impact of the *Change Proposal* on arrangements outside of the *Market Facilitator Rules*, such as *System Operator* licence conditions and the *Electricity Balancing Guideline*; and

(e) the need to allow sufficient time, as set out by the *Authority* in the *Governance Framework Document*, for any *Interested Person* to appeal the *Market Facilitator*'s Decision before implementation.

3.10.2 For any *Change Proposals* impacting *NESO*'s licence conditions and/or any other legislative or licence obligations, the *Market Facilitator* shall work with *NESO* in accordance with the procedure set out in the *Ways of Working Document* to progress such Changes. This may include collaborating on assessing impacts, undertaking industry consultations, and setting the *Implementation Date*. The purpose of this coordination is to ensure alignment between any change processes that *NESO* is required to run and this Change Procedure, thereby facilitating the effective progression and implementation of such *Change Proposals*.

3.10.3 The *Market Facilitator* shall set a single *Implementation Date* for all *System Operators* in accordance with paragraph 3.10, and shall consult on that date as part of the *Assessment Consultation*. Where a *System Operator* considers that it may not be able to meet the *Implementation Date*, it shall seek a *Derogation* in accordance with paragraph 7.1.3,

and shall inform the *Market Facilitator* of any such considerations as part of the Impact Assessment and/or the *Assessment Consultation*.

3.11 Change Register

3.11.1 The *Market Facilitator* shall establish and maintain a register of all its current and past *Change Proposals* and *Issues*, known as the *Change Register*.

3.11.2 The *Market Facilitator* shall maintain and publish the *Change Register* on the *Elexon Website*. The *Change Register* shall be updated at least weekly.

3.11.3 The *Change Register* shall contain at least the following fields:

(a) details of each *Change Proposal* and *Issue*, including the title and unique identifier, name of the *Proposer*, the date the *Change Proposal* or *Issue* was raised, and a brief description of the *Change Proposal* or *Issue* (defect and solution);

(b) a brief summary of the latest status of the *Change Proposal* or *Issue*;

(c) prioritisation scoring;

(d) prioritisation category and rationale;

(e) whether the *Change Proposal* was treated as urgent;

(f) related *Change Proposals* or *Issues* (e.g. where a *Change Proposal* has originated from a previous *Issue*);

(g) the *Progression Route* for the *Change Proposal*;

(h) *Progression Plan* details for the *Change Proposal* or *Issue*;

(i) the Published Date for the *Market Facilitator Rules* to be changed as part of the CP; and

(j) the decision (approved or rejected) for a *Change Proposal*.

3.12 Market Facilitator advice to the industry

3.12.1 The *Market Facilitator* shall provide, free of charge, advice and assistance to any *Interested Person*, consistent with its role of supporting the progression of *Change Proposals* or *Issues*. This shall include:

(a) assistance with the development of *Issues* and *Change Proposals*, and/or exploring other potential remedies to address matters raised;

(b) explaining the operation and effect of this *Change Management Procedure*; and

(c) acting as a 'critical friend' by providing constructive challenge, guidance, and support throughout the change process. This includes helping to frame *issue* statements, develop robust proposals, and ensure that submissions are clear, evidence-based, and capable of being effectively assessed.

4 Setting Progression Routes

4.1 Progression Routes

4.1.1 The *Market Facilitator* shall determine the most appropriate *Progression Route* for gathering the information and evidence needed to support the decision on the CP and to develop the relevant amendments to the *Market Facilitator Rules*.

4.1.2 There are five possible *Progression Routes* for a *Change Proposal*:

(a) Assessment by the *Market Facilitator* (without a *Workgroup*);

(b) Assessment by a *Workgroup*;

(c) Direct to *Assessment Consultation*;

(d) Housekeeping; or

(e) Urgent.

4.1.3 The *Market Facilitator*, in consultation with the *SAB*, *Proposer* and any *Alternative Proposers*, shall set out in the *Progression Plan* the key steps required to complete the assessment of the *Change Proposal*, so that it may proceed to the *Assessment Consultation*.

4.2 Assessment by the Market Facilitator

4.2.1 *Change Proposals* requiring assessment by the *Market Facilitator*, without a *Workgroup*, are those where the *Proposed Solution* or any *Alternative Solutions* are not yet fully developed at the time of submission, but where the *Proposer*, any *Alternative Proposers*, or the *Market Facilitator* does not require additional support to further develop or assess them.

4.2.2 Under this *Progression Route*, the *Market Facilitator* shall work directly with the *Proposer* and any *Alternative Proposers* so that it is ready for *Assessment Consultation*. Following completion of the *Assessment Consultation*, the *Market Facilitator* shall finalise its assessment and prepare the draft *Assessment Report* for presentation to the *SAB* in accordance with paragraph 6.4.2.

4.3 Assessment by a Workgroup

4.3.1 *Change Proposals* requiring assessment by a *Workgroup* are those where the *Proposed Solution* or any *Alternative Solutions* are either not yet developed or do not adequately address the *issue* or defect identified in the *Proposal Form* at the time of submission, and where the *Proposer*, any *Alternative Proposers*, and the *Market Facilitator* agree that further assessment by a *Workgroup* is required to develop and assess the *Proposed Solution* or any *Alternative Solutions*, and where such information cannot reasonably be obtained through the *Assessment Consultation* or an IA.

4.3.2 The purpose of a *Workgroup* Assessment is to support the *Proposer* of the *Proposed Solution* and any *Alternative Proposer*'s of any *Alternative Solutions* to develop the optimal solution for the *issues* identified in the

Proposal Form. The *Workgroup* shall support the development and assessment of the *Change Proposal* by:

(a) Discharging its *Workgroup Terms of Reference*;

(b) Providing its expertise and advice on the *Change Proposal*;

(c) Supporting *Market Facilitator* in drafting and reviewing changes to the *Market Facilitator Rules* (the legal text) for the *Proposed Solution* or any *Alternative Solutions*;

(d) Providing its views on whether the *Proposed Solution* or any *Alternative Solutions* should be approved or rejected as assessed against the *Change Objectives*;

(e) Providing its views on implementation lead times; and

(f) Providing its views on whether any changes are required following the *Assessment Consultation*.

4.3.3 Once the *Workgroup* has finished developing and assessing the *Proposed Solution* and any *Alternative Solutions*, the *Market Facilitator* shall *issue* the *Assessment Consultation*. The *Market Facilitator* shall include the key points and outcomes from *Workgroup* discussion into the *Assessment Consultation*.

4.3.4 Following the *Assessment Consultation*, the *Market Facilitator* shall gather *Workgroup* views on the *Assessment Consultation* responses and whether the *Workgroup* believes any changes should be made to the *Proposed Solution* or any *Alternative Solutions*, together with its reasons and whether its views on the *Change Proposal* have changed.

4.3.5 Upon completion of the *Workgroup*'s assessment, the *Market Facilitator* shall promptly prepare the draft *Assessment Report* to gather *Stakeholder Advisory Board*'s feedback and views on the *Change Proposal* in accordance with paragraph 6.4.

4.4 Direct to Assessment Consultation

4.4.1 The *Market Facilitator* may submit a *Change Proposal* directly to *Assessment Consultation* where the *Proposed Solution* is fully

developed at the time of submission, including the proposed changes to the *Market Facilitator Rules*.

4.4.2 Where the *Market Facilitator* progresses a *Change Proposal* directly to the *Assessment Consultation*, it shall do so by publishing the *Assessment Consultation* in accordance with paragraph 6.2.

4.5 Housekeeping Change Proposals

4.5.1 A *Housekeeping Change Proposal* is a *Change Proposal* that meets the definition set out in paragraph 4.5.3 and shall proceed from the *Raise Phase* directly to the *Decision Phase*.

4.5.2 Following notification of the *Market Facilitator*'s decision to approve a *Housekeeping Change Proposal*, a 10 *Working Day* objection window shall open, during which any *Interested Person* may object to the treatment of the *Change Proposal* as a *Housekeeping Change Proposal*. Any objection must be accompanied by reasons. Where the *Market Facilitator* receives reasonable and substantiated objections, the *Change Proposal* shall proceed to the *Assess Phase*, following re-evaluation of the *Initial Assessment* by the *Market Facilitator* in accordance with 5.3.

4.5.3 A *Housekeeping Change Proposal* shall:

(a) Address the correction of manifest or minor errors, inconsistencies, typographical errors (including, without limitation, punctuation, spelling, or incorrect capitalisation), incorrect cross-referencing, or removal of redundant text within the *Market Facilitator Rules*; and

(b) not have any material impact on the *Market Facilitator Rules* or on stakeholders, such that no stakeholder is required to act differently as a result of the change.

4.5.4 Any *Interested Person* may raise a *Housekeeping Change Proposal*. However, it is expected that the *Market Facilitator* will normally raise

Housekeeping Change Proposals as part of its responsibility to maintain the *Market Facilitator Rules*.

4.5.5 The *Market Facilitator* may refuse to accept a *Change Proposal* as a *Housekeeping Change Proposal* where it determines that the criteria in 4.5.3 have not been met. In such circumstances, it shall notify the *Proposer* in writing, setting out reasons for refusal and, where possible, offering assistance to address the *issues* so that the *Change Proposal* may be resubmitted.

4.6 Urgent Change Proposals

4.6.1 A *Proposer* may request that a *Change Proposal* be treated as urgent at the time of submission to the *Market Facilitator* or at any time before the publication of the *Assessment Report*.

4.6.2 The *Market Facilitator* shall determine whether a *Change Proposal* is to be treated as an Urgent *Change Proposal*. Each request shall be considered on its merits on a case-by-case basis, with reference to the *Urgency Criteria* published by the *Authority*.

4.6.3 Before determining urgency, the *Market Facilitator* shall seek the views of the *SAB* on whether the *Change Proposal* should be treated as urgent. The *SAB* Chair may determine how best to gather such feedback in accordance with the *SAB* Terms of Reference, including holding an ad-hoc meeting or gathering feedback via email.

4.6.4 Where the *Market Facilitator* determines that a *Change Proposal* meets the *Urgency Criteria*, it shall adhere to the standard *Change Management Procedure* so far as reasonably practicable, but may shorten or omit activities, consultations, IAs, and other steps as it deems necessary in order to meet the urgency.

4.6.5 *Issues* are out of scope of the urgency process. Where a matter is considered urgent, a *Change Proposal* must be raised.

4.6.6 The *Market Facilitator* shall notify via the *Change Mailing List* and the *SAB*, of its decision regarding an Urgent *Change Proposals*, including the justification by reference to the *Urgency Criteria*.

5 Raising Change Proposals

5.1 Raise Phase

5.1.1 The purpose of this phase is to assess whether the *Change Proposal* meets the *Validation Criteria*, to prioritise it in accordance with paragraph 3.4 (where necessary), and to determine its *Progression Route* and *Progression Plan* in consultation with the *SAB*, setting these out in the *Initial Written Assessment Report*.

5.2 Submitting Change Proposals

5.2.1 The *Proposal Form* shall require the *Proposer* to provide certain information, including but not limited to the items listed below, which the *Market Facilitator* shall validate in accordance with the *Validation Criteria* in 3.5:

(a) a description, in reasonable detail, of the proposed change to the *Market Facilitator Rules*, including the *issue* or defect to address and the *Proposed Solution*/high level description of Solution, together with the expected benefits and desired outcomes;

(b) the *Proposer*'s interest in the *Market Facilitator Arrangements*, where applicable in accordance with 3.7.1.

(c) an indication of the parts of the *Market Facilitator Rules* that would require amendment, and, where possible, the potential impacts of those Changes on *System Operators* and other stakeholders;

(d) the reasons why the *Proposer* believes that the *Change Proposal* would better facilitate achievement of the *Change Objectives*;

(e) the *Proposer*'s assessment of the *Prioritisation Criteria*, including the supporting rationale; and

(f) where relevant, an indication of the wider impacts of the proposed *Change Proposal*, including (but not limited to) impacts on other *Industry Codes*, the *Electricity Balancing Guideline*, *System Operator* licence conditions or any other legal or legislative obligations on *System Operators* or stakeholders.

5.2.2 The *Market Facilitator* shall work with the *Proposer* to develop the *Progression Plan* and the most appropriate *Progression Route*.

5.2.3 Where the *Market Facilitator* accepts the submission of a *Change Proposal*, it shall:

(a) assign a unique identifier to that *Change Proposal*; and

(b) record the *Change Proposal* on the *Elexon Website* and in the *Change Register*, and notify via the *Market Facilitator* Mailing List of its *Progression Route* and *Progression Plan*, including any prioritisation applied in accordance with paragraph 3.4.

5.2.4 Acceptance and publication under this paragraph shall mark the point at which the *Change Proposal* is formally raised under this Procedure.

5.2.5 Once a *Change Proposal* has been formally raised in accordance with paragraph 5.2.3, the *issue* and defect identified within it shall be treated as fixed and may not be altered.

5.2.6 The *Market Facilitator* shall begin executing the *Progression Plan* after it has determined and published the *Progression Plan* on the *Elexon Website*.

5.2.7 The *Market Facilitator* shall reject the submission of a *Change Proposal* where it fails under one or more of the *Validation Criteria* set out in paragraph 3.5 above. If a *Change Proposal* is rejected at this stage, the *Market Facilitator* shall notify the *SAB* and the *Proposer*, providing the rationale for its decision. The *Market Facilitator* shall work with the *Proposer* to address the reasons for rejection, where appropriate.

5.2.8 In setting the *Progression Plan*, the *Market Facilitator* shall take into account the complexity, urgency, and nature of the *Change Proposal* and:

(a) indicate whether an IA is required in accordance with 3.9 and, if so, the proposed duration; and

(b) indicate how long it intends to *issue* the *Assessment Consultation* for.

5.2.9 The *Proposer*, or *Alternative Proposer*, shall have the right to request that the *Market Facilitator* act as their representative at any stage of the entire Change Process.

5.2.10 The *Market Facilitator* may refuse to act as the representative of a *Proposer*, or *Alternative Proposer*, including (without limitation) where it does not consider that the *Change Proposal* would facilitate delivery of the *Delivery Plan* or achievement of the *Change Objectives*.

5.3 Initial Assessment

5.3.1 For each *Change Proposal* accepted by the *Market Facilitator* in accordance with paragraph 5.2.3, an *Initial Assessment* shall be undertaken in accordance with the requirements of this paragraph 5.3.

5.3.2 The *initial assessment* by the *Market Facilitator* shall include an initial determination of:

(a) the *Progression Route* that the *Change Proposal* will follow;

(b) the *Progression Plan* that the *Change Proposal* will follow, which shall include the expected period of time the *Assessment Consultation* and any IA will be issued for;

(c) whether a mandatory IA for *System Operators* will be required, and if so, the reasons for requiring it; and

(d) the *Change Proposals* Terms of Reference.

5.3.3 The *Market Facilitator* shall prepare an *Initial Written Assessment Report* capturing its *initial assessment* of the CP.

5.3.4 At the next available *SAB* meeting, the *Market Facilitator* shall seek the *SAB*'s views on its *initial assessment*, as detailed in the *Initial Written Assessment Report* and any prioritisation applied, for feedback and advice. The *Market Facilitator* shall invite the *Proposer* to present their *Change Proposal* at that *SAB* meeting. Any feedback received may result in amendments to the prioritisation, the *Progression Plan*, or the *Progression Route*. The *SAB* Chair may determine how best to gather such feedback in accordance with the *SAB* Terms of Reference.

5.3.5 The *Market Facilitator* shall publish the *Initial Written Assessment Report* on the *Elexon Website*.

5.3.6 The *Market Facilitator* may amend the *Progression Plan* and *Progression Route* as circumstances change, for example, for example, in response to advice from the *SAB* or other material developments, and shall provide justification for any such amendments.

6 Assessing Change Proposals

6.1 Assess Phase

6.1.1 The purpose of this phase is to finalise the *Proposed Solution* and any *Alternative Solutions* so that their costs and benefits can be evaluated in sufficient detail to enable an informed decision on whether the change should be approved or rejected, as judged against the *Change Objectives*.

6.1.2 The outcome of the *Assess Phase* shall be an *Assessment Report*, which shall inform the *Market Facilitator*'s decision as to whether a *Proposed Solution* or any *Alternative Solution* is to be approved. The *Assessment Report* shall include, to the extent applicable:

(a) **Description and solutions** – a description of the *issue*(s) the CP seeks to address, together with the *Proposed Solution* and any *Alternative Solutions* developed to resolve those *issue*(s), including how each option would better facilitate achievement of the *Change Objectives*.

(b) **Draft legal text** – the draft legal text (or procedural amendments) to the *Market Facilitator Rules* required to give effect to the *Proposed Solution* or any *Alternative Solutions*.

(c) **Impacts, costs, and timelines** – the impacts of the *Proposed Solution* and any *Alternative Solutions* on the *Market Facilitator Rules* and affected parties, together with the estimated costs of implementation and ongoing operation, and the time required for design and delivery. This shall include the proposed *Publish Date* and *Implementation Date* for the *Market Facilitator Rules*, and any associated *Implementation Monitoring* requirements.

(d) **Legal and regulatory impacts** – whether, and to what extent, the *Change Proposal* would require amendment to, or have any impact on, any relevant legal, regulatory, or licence-based arrangements, including (but not limited to) the *Electricity Balancing Guideline* (*EBGL*).

(e) **Impact Assessments (IA)** – the outcome of any IA(s) undertaken to support the development and assessment of the *Proposed Solution* and any *Alternative Solutions*.

(f) **Specialist analysis** – details of any assessment or analysis carried out by an external specialist or consultant, together with the rationale for commissioning such work.

(g) **Stakeholder views** – a summary of the views submitted by any *workgroup*, respondents to consultation, including views on the *Change Objectives*, and how these views have been taken into account and any resulting amendments to the *Proposed Solution* or any *Alternative Solutions*.

(h) ***SAB* views** – the views and advice of the *Stakeholder Advisory Board*, including its recommendation on whether the *Change Proposal* should be approved or rejected, as assessed against the *Change Objectives*.

(i) ***Market Facilitator* views** – the *Market Facilitator*'s rationale and minded-to position on whether the Proposed or any *Alternative Solutions* should be approved or rejected, as presented to the *SAB*, including, where relevant, any reasons for deviating from the advice or recommendations of the *Stakeholder Advisory Board*.

(j) **Any other matters** – any other matters which the *Market Facilitator* reasonably considers relevant to the assessment of the *Change Proposal*.

6.1.3 At any stage during the *Assess Phase*, the *Market Facilitator* may prepare an interim report setting out its provisional findings in respect of the matters required for the *Assessment Report*. The *Market Facilitator* may present such a report to the *SAB* to seek feedback that may aid the further development and assessment of the *Change Proposal* via the appropriate *Progression Route*.

6.1.4 The *Market Facilitator* may commission additional analysis, engage external specialists, or procure any other services or assistance it considers necessary to support the development or proper assessment of a *Change Proposal*. Where the cost of such services is likely to exceed £300,000, the *Market Facilitator* shall seek the views of the *SAB* on whether to proceed, and in giving its views the *SAB* may consult with the *Authority*.

6.2 Impact Assessment

6.2.1 The *Market Facilitator* shall conduct an Impact Assessment (IA) to gather evidence and information to support its decision-making during the Assessment Phase. The IA shall collect information on, among other things, the impacts, costs, and benefits associated with implementing and operating the *Proposed Solution* and any *Alternative Solutions*. The scope and depth of the IA shall be determined by the *Market Facilitator*, having regard to the magnitude, complexity, and potential impacts of the *Change Proposal*, such that more significant Changes are likely to require a more comprehensive IA.

6.2.2 During the IA process, the *Market Facilitator* shall *issue* a public invitation via the *Change Mailing List*, and published on the *Elexon website*, to invite information on the potential impact of a proposed *Change Proposal* on their organisations, covering both implementation activities and ongoing operations. Participation shall be voluntary, except where the *Market Facilitator* requires *System Operators* to participate. Where *System Operators* are required to provide an IA, the *Market Facilitator* shall justify the requirement.

6.2.3 The *Market Facilitator* shall determine whether to *issue* an IA as part of the *Assessment Consultation* or as a separate exercise.

6.2.4 The information provided in an IA shall be used in evaluating a *Change Proposal*, including its assessment against the *Change Objectives*, to inform the decision on whether to approve or reject the *Change Proposal*. Non-confidential versions of the IA shall be published by the *Market Facilitator*. Anonymised summaries of confidential responses may also be published, provided that such summaries do not enable the responder to be identified. Confidential responses shall be provided to the *Authority* to support any appeal, or otherwise upon request.

6.2.5 The IA may request the following information (non-exhaustive list) on the impact of implementing and then operating the *Proposed Solution* or any *Alternative Solutions* from stakeholders:

(a) The impacts on their organisation;

(b) The estimated costs;

(c) The expected benefits or disbenefits;

(d) The time required to implement;

(e) Any other impacts that should be brought to the *Market Facilitator*'s attention;

(f) Any differences in the above between *Alternative Solutions* and implementation options; and

(g) Any suggestions for better solution(s) than those proposed, including rationale.

6.2.6 The *NESO* shall inform the *Market Facilitator*, via any Impact Assessment, where it considers that a *Change Proposal* may, or will, require it to undertake additional consultation or design activities to implement the *Change Proposal*, including an estimate of the time required to do so.

6.3 Assessment Consultation

6.3.1 A *Change Proposal* shall be issued for *Assessment Consultation* once the *Market Facilitator* considers it to be sufficiently developed, including the preparation of draft legal text and completion of all other information required under paragraph 6.1.2, except for those elements intended to be explored through the consultation itself, for the purpose of seeking views from *Interested Persons* and stakeholders on the *Proposed Solution* and any *Alternative Solutions*, including their impacts, costs, benefits, and implementation considerations.

6.3.2 Each *Change Proposal* (except *Housekeeping Change Proposals*) shall be issued for an *Assessment Consultation* that seeks views on the matters set out in 6.1.2 The consultation period shall be determined by the *Market Facilitator*, having regard to the complexity of the *Change Proposal*.

6.3.3 The *Market Facilitator* may determine that it is necessary to *issue Change Proposals* for more than one IA or *Assessment Consultation*, for example, where a *Proposed Solution* or any *Alternative Solutions* have materially changed.

6.3.4 An IA may form part of the *Assessment Consultation* or may be issued in advance of it. The IA is intended to inform the development of solution options, *Implementation Dates*, and views on whether the *Change Proposal* should be approved or rejected.

6.3.5 Where the *Market Facilitator* considers that a potential change to the *Flexibility Market Rules* may impact the *National Energy System Operator*'s other legal obligations, it may invite the *Authority*, as part of the *Assessment Consultation* or separately, to share any provisional opinion or guidance. Any provisional view provided shall only be shared with those whom the *Authority* stipulates.

6.3.6 Following the closure of the *Assessment Consultation*, the *Market Facilitator* shall publish all non-confidential responses within five *Working Days*. Confidential responses shall not be published; however, anonymised summaries of confidential responses may be published, provided that such summaries do not enable the responder to be identified. Confidential responses shall be provided to the *Authority* to support any appeal, or otherwise upon request.

6.4 Draft Assessment Report

6.4.1 Following completion of the *Assessment Consultation*, and subject to the need for any further assessment (including by a *Workgroup*), the *Market Facilitator* shall produce a draft version of the *Assessment Report*.

6.4.2 The draft *Assessment Report* shall be presented to the *SAB* for its views on the *Change Proposal* and shall be published on the *Elexon Website* in advance of the *SAB* meeting.

6.4.3 Following consideration of the *SAB*'s views on the draft *Assessment Report*, the *Market Facilitator* shall determine whether to submit the *Change Proposal* for further assessment (in which case it shall revise the *Progression Plan* and Route) or to progress the *Change Proposal* to the *Decision Phase*.

6.4.4 Where the *Market Facilitator* decides to progress the CP to the *Decision Phase*, it shall publish the *Assessment Report*, incorporating the *SAB*'s views, on the *Elexon Website* within five *Working Days* of the receiving the *SAB* views in accordance with 6.4.2.

7 Deciding upon Change Proposals

7.1 Decision Phase

7.1.1 The purpose of the *Decision Phase* is for the *Market Facilitator* to determine whether a *Proposed Solution* or any *Alternative Solution* shall be approved and implemented or rejected and closed.

7.1.2 Subject to paragraph 7.1.3, the *Market Facilitator* shall decide whether to approve or reject a *Proposed Solution* or any *Alternative Solution*, and, where a valid *Derogation* request has been submitted in accordance with paragraph 8.3, may also decide whether to approve any associated *Derogations*, based on the information set out in the *Assessment Report*.

7.1.3 Where a *Proposed Solution* or any *Alternative Solution* is approved and requires further development or consultation by the *NESO* in order to implement it, the *Market Facilitator* shall, where possible, reflect this in the *Implementation Date* following engagement with *NESO*. Where it is not possible to accommodate this within the *Implementation Date*, the *Market Facilitator* may agree an appropriate *Derogation* for *NESO* as part of the *Market Facilitator* Decision.

7.1.4 The *Market Facilitator* shall publish its decision in a *Decision Report* that must contain:

(a) The *Market Facilitator*'s decision on whether or not the *Proposed Solution* or any *Alternative Solution* should be implemented, as justified against the *Change Objectives*;

(b) The rationale for deviating from the *SAB*'s recommendation on whether to approve the *Proposed Solution* or any *Alternative Solution*, where applicable;

(c) The *Publish Date* of any *Proposed Solution* or Alterative Solution; and

(d) The *Implementation Date* of any *Proposed Solution* or *Alternative Solution*, taking into account any impacts identified in the

Assessment Report, including on the *Electricity Balancing Guideline* (*EBGL*) and other regulatory dependencies and constraints.

7.1.5 The *Decision Report* shall be published on the *Elexon Website* and, on the same day, notified via the *Change Mailing List*.

7.1.6 The *Market Facilitator* shall update the *Change Register* and inform the *Proposer* and any *Alternative Proposers* of its decision once it is published.

7.1.7 *Interested Persons* shall have the right to appeal the *Market Facilitator*'s decision made in accordance with 7.1.2, to the *Authority*, in accordance with the timescales, process and criteria set out in the *Governance Framework Document*. The assessment criteria and the possible resolution actions are determined and maintained by the *Authority* within its *Governance Framework Document*.

7.1.8 The *Market Facilitator* may, at any time prior to publishing the *Decision Report*, return a *Change Proposal* to the Assessment Phase where it considers that further analysis, consultation, or development is required in order to reach an informed Decision. In doing so, the *Market Facilitator* shall set out its reasons for returning the *Change Proposal* to the Assessment Phase in a revised *Assessment Report*, and may request additional Impact Assessments, convene further *Workgroup* meetings, or undertake other actions considered necessary to complete the Assessment Phase.

8 Implementing Change Proposals

8.1 Implementation Phase

8.1.1 The purpose of this phase is for the approved solution to be implemented in accordance with the approved *Implementation Date* as detailed in the *Decision Report*.

8.1.2 The *Market Facilitator* and *System Operators*, as applicable, shall take appropriate steps to give full and timely effect to an approved solution in accordance with the *Decision Report* and the *Implementation Date* or any approved *Derogation*.

8.1.3 The *Market Facilitator* shall provide a report to the *SAB* where it appears, in the *Market Facilitator*'s opinion, that significant problems may arise, or have arisen, in the implementation of an approved solution.

8.1.4 Each *System Operator* shall notify the *Market Facilitator* in writing if it believes it will be unable to meet the *Implementation Date*, or any date specified under an approved *Derogation*, in accordance with paragraph 8.3 and the *Implementation Monitoring Procedure*.

8.1.5 The *NESO* shall undertake the necessary steps under the *Electricity Balancing Guideline* (*EBGL*), and any other applicable regulatory processes, to implement an approved *Proposed Solution* or *Alternative Solution*, and shall keep the *Market Facilitator* informed of its progress in accordance with the *Implementation Monitoring Procedure*.

8.2 Amending Implementation Dates

8.2.1 Once a *Change Proposal* has been approved, the *Implementation Date* may only be amended by:

(a) raising a new *Change Proposal* to amend the *Implementation Date*; or

(b) direction of the *Authority* pursuant to an appeal under paragraph 7.1.7.

8.2.2 If an *Implementation Date* is amended after a decision has been made, the *Market Facilitator* shall notify the *Change Mailing List* and inform the *Stakeholder Advisory Board* (*SAB*).

8.2.3 For the *Flexibility Market Rules*, *Derogations* may, where permitted within the *Flexibility Market Rules* and subject to paragraph 8.3, be approved by the *Market Facilitator*.

8.3 Derogations

8.3.1 Where permitted within the *Flexibility Market Rules*, the *Market Facilitator* may grant a *Derogation* from the application of a specific *Flexibility Market Rule*, in whole or in part, subject to this paragraph 8.3.

8.3.2 A *Derogation* may only be granted where the *Market Facilitator* is satisfied that:

(a) the *Derogation* would not have a material adverse impact on the operation of the *Market Facilitator Arrangements* or the achievement of the *Change Objectives*;

(b) the applicant has demonstrated that compliance with the relevant *Flexibility Market Rule* is impractical, disproportionate, or unnecessary in the circumstances; and

(c) the *Derogation* would not unfairly disadvantage or discriminate against any other party.

8.3.3 A *Derogation* request may be submitted in relation to a *Flexibility Market Rule* that is either in force or proposed but not yet approved or published. Where the request relates to a proposed *Flexibility Market Rule*, the *Market Facilitator* may decide whether to approve or reject the *Derogation* as part of its decision under paragraph 7.1.2. In all other cases, the *Market Facilitator* shall determine the *Derogation* in accordance with this paragraph 8.3 after the relevant Rule has been approved and published.

8.3.4 A *Flexibility Market Rule* may, where expressly stated, allow for self-*derogation* by a *System Operator*. Where such a provision applies, paragraphs 8.3.7 to 8.3.9 of this Procedure shall not apply to that *Derogation*.

8.3.5 Where a *System Operator* exercises a self-*derogation*, it shall notify the *Market Facilitator* and provide the information specified in paragraph 8.3.6. The *Market Facilitator* shall record all such self-*derogations* in the *Derogation Register*. Where the *Market Facilitator* considers that a self-*derogation* does not meet the criteria in 8.3.2, it may reject the self-*derogation* or require its amendment, following engagement with the relevant *System Operator* and, where appropriate, consultation with the *Stakeholder Advisory Board*.

8.3.6 Any request for a *Derogation*, including a self-*derogation* exercised by a *System Operator*, shall include sufficient information to enable the *Market Facilitator* to assess the request against the criteria in paragraph 8.3.2. As a minimum, the information provided shall include:

(a) the *Flexibility Market Rules* or paragraphs or sections from which *Derogation* is sought;

(b) the reasons for seeking the *Derogation*;

(c) the duration for which the *Derogation* is requested, including, where applicable the *System Operator*'s plan to return to full compliance; and

(d) any supporting evidence demonstrating how the criteria in paragraph 8.3.2 are satisfied.

8.3.7 The *Market Facilitator* may consult with the *Stakeholder Advisory Board*, *System Operators*, or other stakeholders as it considers appropriate prior to making a decision on the *Derogation Application*.

8.3.8 The *Market Facilitator* shall determine whether to grant, grant subject to conditions, or refuse the *Derogation* and shall notify the applicant in writing of its decision, including reasons.

8.3.9 Where a *Derogation* is granted, the *Market Facilitator* shall specify:

(a) the *Flexibility Market Rules* or provisions or sections from to which it applies;

(b) the start and end date of the *Derogation*;

(c) any conditions or reporting requirements; and

(d) the circumstances in which the *Derogation* may be reviewed or revoked.

8.3.10 The *Market Facilitator* shall maintain and publish on the *Elexon Website* a *Derogation Register* of all *Derogations*, including self-*derogations*, detailing, without limitation, the information submitted in 8.3.9.

8.3.11 The *Market Facilitator* may review, amend, or revoke any *Derogation* where the circumstances that justified it no longer apply, or where continued application would have an adverse impact on the *Market Facilitator Arrangements*. Before making any such decision, the *Market Facilitator* may seek the views of the *Stakeholder Advisory Board* (*SAB*) and shall take those views into account when determining its decision.

9 Raising and progressing Issues

9.1

9.1.1 An *Issue* may be raised by any *Interested Person* or by the *Market Facilitator* where a defect, problem, or potential improvement is identified in the *Market Facilitator Rules*, but the appropriate resolution or next steps are uncertain.

9.1.2 The *Issue* must meet the *Validation Criteria* in 3.5, and upon accepting the submission of an *Issue* the *Market Facilitator* shall assign a unique identifier to the *Issue* and update the *Change Register* accordingly.

9.1.3 The *Market Facilitator* shall work with the *Proposer* to determine the best way to address the *Issue*, which can include the *Market*

Facilitator's assessment of the *Issue* or convening a group of relevant experts to advise on the *Issue*, known as an *Issue Group*.

9.1.4 If an *Issue Group* is required, the *Market Facilitator* shall convene the group and invite members to participate, in line with the *Issue Terms of Reference* set by the *Market Facilitator*.

9.1.5 The *Market Facilitator* may consult the *SAB* on the *Issue* and on its terms of reference.

9.1.6 Once the *Issue Terms of Reference* have been addressed, the *Market Facilitator* shall prepare an *Issue Report* and submit it to the *SAB* for feedback and advice. The *SAB* Chair shall determine how best to gather such feedback in accordance with the *SAB* Terms of Reference.

9.1.7 The recommendations in an *Issue Report* shall be non-binding.

9.1.8 The *Market Facilitator* shall publish the *Issue Report* on the *Elexon Website* and update the *Change Register* to reflect the *Issue*'s status.

9.1.9 The *Proposer* of an *Issue* may withdraw their *Issue* at any time before the publication of the *Issue Report* by notifying the *Market Facilitator* and providing its reasons in writing.

9.1.10 Upon receiving such notice, the *Market Facilitator* shall, as soon as reasonably practicable, notify the *Change Mailing List* that the *Issue* has been withdrawn. The date on which this notification is sent shall mark the opening of a 15 *Working Day* adoption window. In that notification, the *Market Facilitator* shall expressly invite *Interested Persons* to adopt the *Issue*.

9.1.11 Any adoption shall be on a first-come, first-served basis as notified by the *Market Facilitator*.

9.1.12 The *Market Facilitator* may itself choose to adopt the *Issue*.

10 Establishing, maintaining, or removing Market Facilitator Rules

10.1 Compliance with Market Facilitator Rules and associated guidance

10.1.1 The *Market Facilitator* and *System Operators* shall comply with the *Market Facilitator Rules* in accordance with the *Governance Framework Document*.

10.1.2 Guidance, which shall not be legally binding or require compliance under paragraph 10.1.1, may be included within the *Market Facilitator Rules*, provided that it is clearly identified as guidance, or published in separate documents, to assist in understanding the *Market Facilitator Rules* and the role of the *Market Facilitator*.

10.1.3 Guidance, whether included within the *Market Facilitator Rules* or published in separate guidance documents, and any document metadata may be updated by the *Market Facilitator* from time to time and shall not require a *Change Proposal* to add, amend, or remove it. The *Market Facilitator* shall, however, notify the *Change Mailing List* of any material updates and adhere to the version control requirements set out in paragraph 10.3.

10.2 Baseline Statement

10.2.1 The *Market Facilitator* shall maintain and publish a record of all *Market Facilitator Rules* that are subject to the change control processes set out in this document. This record shall be referred to as the *Baseline Statement*.

10.2.2 The *Market Facilitator* shall update the *Baseline Statement* each time a new version of the *Market Facilitator Rules* is published, to reflect the version and *Publish Date* of those Rules.

10.2.3 As a minimum, the *Baseline Statement* shall contain:

(a) The title and unique identifier of each document that is in force, and of any obsolete documents;

(b) The latest version of each document;

(c) The *Publish Date* of that version; and

(d) The *Change Proposal* or guidance update that resulted in that version of the document.

10.3 Maintaining

10.3.1 The *Market Facilitator* shall establish and maintain a document management system to control and record all versions of the *Market Facilitator Rules*.

10.3.2 All *Market Facilitator Rules* shall be subject to version control, with the initial version designated as 1.0, and all subsequent versions adhering to the following principles:

(a) Updated to the next major version (e.g. v1.0 to v2.0) where the *Market Facilitator Rules* are being updated; or

(b) Updated to the next minor version (e.g. v1.1 to v1.2) where the update does not impact the legally binding text, including updates to guidance, metadata, document properties or other supporting information.

10.3.3 The *Market Facilitator* shall create and maintain standardised:

(a) Document templates.

(b) A style guide for documents.

(c) A style guide for digital publication.

(d) A metadata catalogue.

10.3.4 There are two types of *Market Facilitator* artefacts:

(a) *Market Facilitator Governance Documents*; and

(b) *Flexibility Market Rules*.

10.4 Adding or removing Market Facilitator Rules

10.4.1 A *Change Proposal* must be progressed and approved to add or remove a *Market Facilitator* Governance Document or a *Flexibility Market Rule*.

11 Acronyms and defined terms

11.1 List of Acronyms

11.2 List of Definitions

11.2.1 A master list of definitions can be found in the *Market Facilitator Glossary*.

11.2.2 The following definitions are specific to this Governance Document. These are supplemented by the definitions in the *Market Facilitator Glossary*. If there is an inconsistency between definitions, the definition in this document shall prevail.

FGD: *Change Management Procedure* - Amendment record

Acronyms and defined terms

Term	Aliases	Definition
NESO	–	National Energy System Operator
DNO	–	Distribution Network Operator
SAB	–	Stakeholder Advisory Board
BSC	–	Balancing and Settlement Code
Alternative Proposer	–	has the meaning given to that term in 3.8.3 of the Change Management Procedure
Alternative Solution	–	a solution to a Change Proposal, other than the Proposer's Proposed Solution, that is formally submitted by an Interested Person (the "Alternative Proposer") through the Proposal Form, meets the Validation Criteria, and is assessed and developed in the same manner as the Proposed Solution
Assess Phase	–	the stage of the Change Management Procedure undertaken by the Market Facilitator in accordance with paragraph 6.1 of the Change Management Procedure
Assessment Consultation	–	the consultation undertaken by the Market Facilitator during the Assessment Phase of a Change Proposal, in

Term	Aliases	Definition
		accordance with paragraph 6.3 of the Change Management Procedure
Assessment Report	–	the report prepared by the Market Facilitator in accordance with paragraph 6.4.4 of the Change Management Procedure
Authority	–	the Gas and Electricity Markets Authority established by section 1(1) of the Utilities Act 2000
Baseline Statement	–	has the meaning given to that term in paragraph 10.1 of the Change Management Procedure
Change Mailing List	–	the distribution list maintained by the Market Facilitator for the purpose of notifying Interested Persons, System Operators, and the Authority of Change Proposals, Issues, consultations, decisions, and other relevant updates under the Market Facilitator Change Procedure. Any party may request to be added to, or removed from, the Change Mailing List in accordance with the process specified by the Market Facilitator. Each Interested Person shall be responsible for ensuring that its contact details are correctly registered on, and

Term	Aliases	Definition
		kept up to date in, the Change Mailing List
Change Management Procedure	–	the procedure established and maintained by the Market Facilitator for raising, assessing, deciding, and implementing changes to the Market Facilitator Rules
Change Objectives	–	has the meaning given to that term in paragraph 3.6 of the Change Management Procedure
Change Proposal	–	has the meaning given to that term in paragraph 3.1 of the Change Management Procedure
Change Proposal Terms of Reference	–	the specific scope, objectives, and issues to be addressed in relation to a Change Proposal, as determined by the Market Facilitator (in consultation with the SAB)
Change Register	–	has the meaning given to that term in paragraph 3.11 of the Change Management Procedure
Decision Phase	–	the stage of the Change Management Procedure undertaken by the Market Facilitator in accordance with paragraph 7.1 of the Change Management Procedure
Decision Report	–	the report prepared by the Market Facilitator under

Term	Aliases	Definition
		this Procedure in accordance with 7.1.4
Delivery Plan Opportunity	–	any opportunity, idea, or proposal identified by the Market Facilitator, or notified to it by the Authority or stakeholders, which the Market Facilitator shall consider in determining whether that opportunity could assist the Market Facilitator in achieving the performance objectives set by the Authority, and whether it should be included in the Delivery Plan or Delivery Schedule.
Derogation	–	a conditional exemption, granted by the Market Facilitator in accordance with paragraph 8.3 of the Change Management Procedure, from compliance with a specific paragraph, section, or the entirety of a Flexibility Market Rule, to the extent and for the duration specified in the derogation approval
Derogation Application	–	a written request submitted to the Market Facilitator in accordance with paragraph 8.3.3 of the Change Management Procedure, seeking a Derogation from one or more Rules or requirements of the Market Facilitator Rules, and

Term	Aliases	Definition
		including the information required under that paragraph
Derogation Register	–	the register maintained and published by the Market Facilitator in accordance with paragraph 8.3.10 of the Change Management Procedure, recording all active, expired, and revoked derogations, including their scope, duration, conditions, and any associated reporting obligations
Electricity Balancing Guideline	EBGL	The GB Electricity Balancing Guideline, retaining and assimilating the EU law version of Commission Regulation (EU) 2017/2195
Governance Framework Document	–	the document of that title issued by the Authority to establish the Market Facilitator Arrangements, as amended from time to time
Housekeeping Change Proposal	–	has the meaning given to that term in paragraph 4.5.1 of the Change Management Procedure
Housekeeping Criteria	–	has the meaning given to that term in paragraph 4.5.3 of the Change Management Procedure
Implementation Date	–	the date specified by the Market Facilitator

Term	Aliases	Definition
		(following consultation in accordance with the Change Management Procedure, and subject to any direction of the Authority in relation to an appeal) on which an Approved Solution or an Alternative Solution, subject to any Derogation issued, shall take operational effect, and by which any affected System Operators and other relevant parties shall be required to have implemented any necessary system or process changes to comply with the Market Facilitator Rules as created or amended
Implementation Phase	–	the stage of the Change Management Procedure undertaken by the Market Facilitator in accordance with paragraph 8 of the Change Management Procedure
Industry Code	–	the formalised rules approved by the Authority from time to time that support the electricity industry to supply energy to homes and businesses. Reference to "Industry Code" shall include all codes subject to this definition

Term	Aliases	Definition
Initial Assessment	–	the stage of the Change Management Procedure undertaken by the Market Facilitator following the formal raising of a Change Proposal in accordance with paragraph 5.2.3 of the Change Management Procedure
Initial Written Assessment Report	–	has the meaning given to that term in paragraph 5.3.2 of the Change Management Procedure
Interested Person	–	any individual or organisation that can demonstrate a legitimate interest in the Market Facilitator Arrangements, including their design, delivery, governance, operation, or impacts.For the avoidance of doubt, this includes the Market Facilitator, the Authority, the National Energy System Operator (NESO), Distribution Network Operators (DNOs), and Flexibility Service Providers
Issue	–	has the meaning given to that term in paragraph 3.2 of the Change Management Procedure
Issue Group	–	a group established by the Market Facilitator to consider and assess an Issue, explore issues, potential solutions or next

Term	Aliases	Definition
		steps, and make recommendations to the Market Facilitator on whether a Change Proposal should be raised or other action taken
Issue Report	–	the report prepared by the Market Facilitator in accordance with paragraph 9.1.6 of the Change Management Procedure, setting out the findings, discussions, and recommendations arising from the consideration of an Issue, including whether a Change Proposal should be raised or other actions taken
Issue Terms of Reference	–	the terms of reference established and maintained by the Market Facilitator which set out how Issue Groups shall conduct their business and the matters they must support the resolution of
Market Facilitator Governance Documents	–	the suite of governance documents established and maintained by the Market Facilitator which set out the processes and procedures it shall follow in discharging its responsibilities
Prioritisation Criteria	–	has the meaning given to that term in paragraph 3.4 of the Change Management Procedure

Term	Aliases	Definition
Progression Plan	–	the plan determined by the Market Facilitator, in consultation with the SAB, setting out the steps, activities, and indicative timetable for the assessment, development, and determination of a Change Proposal under its Progression Route
Progression Route	–	the pathway determined by the Market Facilitator for the assessment and development of a Change Proposal, in accordance with paragraph 4.1 of the Change Management Procedure
Proposal Form	–	the standard form, as specified by the Market Facilitator from time to time, which must be completed and submitted in order to raise a Change Proposal in accordance with paragraph 5.2 of the Change Management Procedure
Proposed Solution	–	the solution to a Change Proposal formally submitted by the Proposer through the Proposal Form, which meets the Validation Criteria and is assessed and developed under this Change Management Procedure
Proposer	–	the person or entity that formally submits a

Term	Aliases	Definition
		Proposed Solution by completing and submitting a valid Proposal Form in accordance with paragraph 5.1 of the Change Management Procedure
Publish Date	–	the date specified by the Market Facilitator on which an approved Proposed Solution or Alternative Solution to the Market Facilitator Rules shall be published and take legal effect
Raise Phase	–	the stage of the Change Management Procedure undertaken by the Market Facilitator in accordance with paragraph 5.2 of the Change Management Procedure
Technical Secretary	–	the person appointed by the Market Facilitator to provide administrative and procedural support to a Workgroup or the SAB, including (without limitation) arranging meetings, preparing and circulating papers, recording minutes, maintaining records, and assisting in the coordination of activities as required by the relevant Workgroup Chair or the SAB Chair, as applicable
Urgency Criteria	–	the criteria published by the Authority from time to time,

Term	Aliases	Definition
		titled “Ofgem Guidance on Code Modification Urgency Criteria”, which the Market Facilitator will use for determining whether a Change Proposal should be treated as urgent
Validation Criteria	–	has the meaning given to that term in paragraph 3.5 of the Change Management Procedure
Ways of Working Document	–	the document established and maintained jointly by the Market Facilitator and the National Energy System Operator in accordance with the Governance Framework Document. It sets out the detailed working arrangements, processes, and protocols governing coordination between the Market Facilitator and NESO in the development, assessment, and implementation of Market Facilitator Change Proposals and any and any related changes raised by the National Energy System Operator
Workgroup	–	a group established by the Market Facilitator under this Change Management Procedure to assess and develop a Change Proposal and any Alternative Solutions, in accordance with the

Term	Aliases	Definition
		applicable Change Proposal Terms of Reference and Workgroup Terms of Reference. A Workgroup may include Workgroup Members drawn from Interested Persons, System Operators, the SAB, or other stakeholders with relevant expertise or experience
Workgroup Chair	–	the person appointed by the Market Facilitator to chair a Workgroup or an Issue Group, responsible for managing its proceedings in accordance with the relevant Terms of Reference, ensuring fair and effective discussion
Workgroup Member	–	any person appointed by the Market Facilitator to participate in a Workgroup or an Issue Group established under this Change Management Procedure, including (without limitation) representatives of Interested Persons, System Operators, the SAB, or other stakeholders with relevant expertise or experience, for the purpose of assessing and developing one or more Change Proposals or Issues

Term	Aliases	Definition
Workgroup Terms of Reference	–	the terms of reference established and maintained by the Market Facilitator which set out how Workgroups shall conduct their business and the matters they must support the resolution of, as detailed in the Change Proposal Terms of Reference

Guidance

This section is provided as guidance to this flexibility market governance document. Therefore, it is not legally binding and falls outside of the formal change management process.

Version	**Published Date**	**Document Status**	**Description of Changes**	***Change Proposal* Reference**	***Market Facilitator Decision Report* Ref**
1.0	12/12/2025	Final	Document Published	-	-

Annex 1: Associated meta-data

Guidance

> *This annex is provided as guidance to the flexibility market governance document. Therefore, it is not legally binding and falls outside of the formal change management process.*

Identifier	FGD-CMP
Title	*Change Management Procedure*
Type	*Flexibility Market* Governance
Collection	**Governance Document**
Audience	***NESO*, *DNOs*, *Market Facilitator*, *Flexibility Service Providers*, Ofgem, *SAB*, other *interested persons***
Expertise	N/A
Owner	*Market Facilitator*
Expected benefit	N/A
Related end-to-end process reference	N/A
References	FGD-DPP, FGD-IMP, FGD-*SAB*, FGD-FMF, FMR-GLO
IsReferencedBy	
Published version number	1.0

Applicability	N/A
Published Date	12/12/2025
Implementation Date	12/12/2025
End Date	-
Terms of variations	
List of *Derogations*	N/A
IsReplacedBy	N/A
Replaces	N/A
Status	Final
Change since last version	N/A
Description	Sets out the process for raising, assessing, deciding and implementing changes to the *Market Facilitator Rules*, and the process for progressing *Derogations* against *Flexibility Market Rules*, where applicable.