



# Report on Issue 47 'GB Implementation of the European Transparency Regulation'

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<b>Meeting Name</b>	BSC Panel
<b>Meeting Date</b>	11 July 2013
<b>Purpose of paper</b>	For Information
<b>Summary</b>	This paper sets out the discussions, conclusions and recommendations of the Issue 47 Group. The Group recommends that a BSC Modification should be raised to progress a reporting solution for Transparency Regulation data, and has set out some solution options and issues which it believes should be considered as part of such a Modification. Issue 47 is now closed.

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## 1. Background

- 1.1 National Grid raised Issue 47 on 26 April 2013 with the aim of facilitating industry discussion of GB implementation of the European Regulation on 'submission and publication of data in electricity markets', commonly known, and referred to in this paper, as the 'Transparency Regulation'.
- 1.2 On 14 June 2013 (following the final Issue 47 meeting but prior to the finalisation of this paper), the [Transparency Regulation](#) was published in the Official Journal of the European Union. The Regulation comes into force 20 days after publication (4 July), and there is an 18 month implementation period from that date, meaning that the arrangements delivering the Transparency Regulation must be implemented by 4 January 2015.
- 1.3 Under the Transparency Regulation, primary data owners must submit a number of data items to their Transmission System Operators (TSO) or a third party acting as a data provider (with prior agreement of the TSO) for publication on a central information platform - referred to as the 'Central Platform' in this paper, currently being developed by ENTSO-E and known as Electricity Market Fundamental Information Platform (EMFIP)). Under the Regulation ENTSO-E are developing a Manual of Procedures to set out the details and formats for the submission of data to the Central Platform, including standard submission methods and technical details that data providers must meet.
- 1.4 The Regulation will place obligations on TSOs, Distribution System Operators (DSOs), generators and large consumers to submit information. The Regulation places an obligation on parties to submit additional data to that already submitted under various GB industry requirements, the data that will be required under Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency (REMIT), and the European Network Codes being developed under Article 6 of Regulation (EC) No 714/2009.



- 1.5 Issue 47 suggested that issues to be considered and clarified around the Transparency Regulation include:
- Who should act as the GB central data provider to the Central Platform;
  - Clarifying the data items under the Transparency Regulation and mapping them from data owner to GB central data provider to the Central Platform
  - Identifying obligations on industry participants and changes required to GB industry Codes;
  - Considering whether some/all of the GB Transparency Regulation information supplied to the Central Platform should be published elsewhere, i.e. BMRS; and
  - Consistency between implementation of the Transparency Regulation and the approach to REMIT under [Modification P291](#), 'REMIT Inside Information Reporting Platform for GB Electricity' (if approved) which would facilitate publication of REMIT information on the BMRS website, with some of this information also falling under the Transparency Regulation.
- 1.6 The Issue 47 Group met twice to consider Issue 47 and, to help its consideration, requested a gap analysis by National Grid and ELEXON to compare the information currently available to National Grid and the data currently reported on the BMRS with the data required under the Transparency Regulation. This analysis can be found in Attachment A.

## 2. Transparency Regulation solutions for consideration

- 2.1 The four solution options (one with two sub-options) that the Group agreed should be considered are each set out in this section, with a summary table at the end of the section. The Group's discussions that lead to these solutions are outlined in the next section.
- 2.2 Under all of these options the BMRS would continue to publish the information it currently does (though publication of the information may be considered in light of the reporting of similar information on the central platform, though this would be a separate change to a change to progress a solution to Issue 47).
- 2.3 Though the Group gave its view on what should be reported on the BMRS, the data published on the BMRS should be considered as part of the progression of any Modification raised subsequently to progress an Issue 47 solution.

### Option 1: National Grid data reported directly to Central Platform

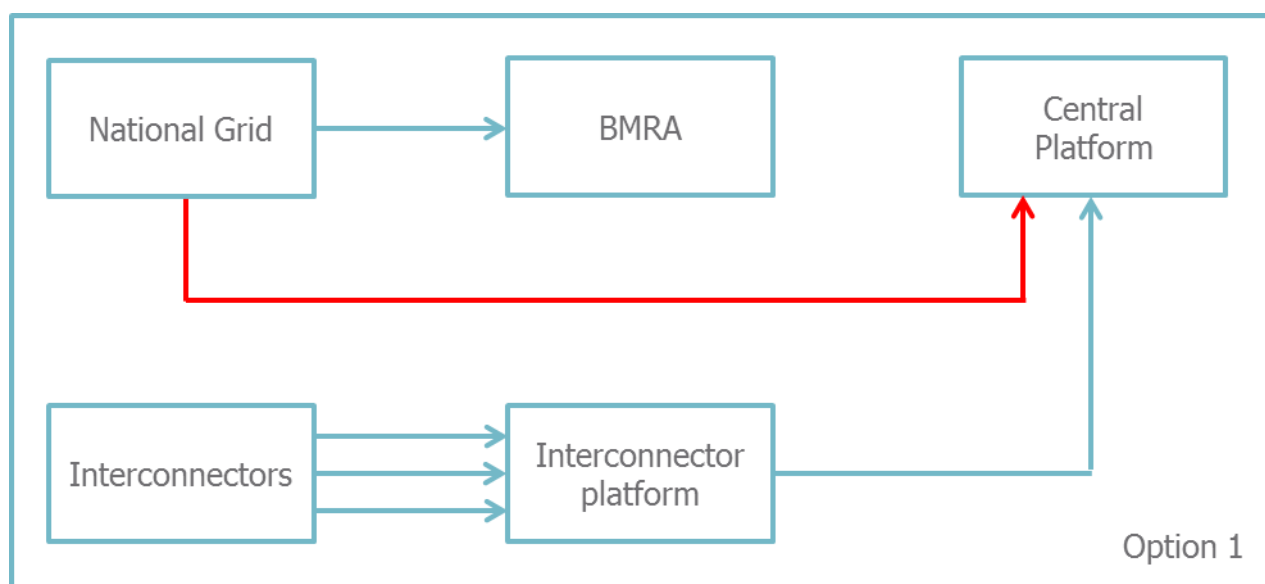
- 2.4 Under this option National Grid would report data directly to the Central Platform, bypassing ELEXON and the BMRS. Interconnectors would submit their data via the existing Interconnector Platform (outside the BSC). Depending on the sub-option applied, Option 1 could have no BSC impact. The sub-options are:



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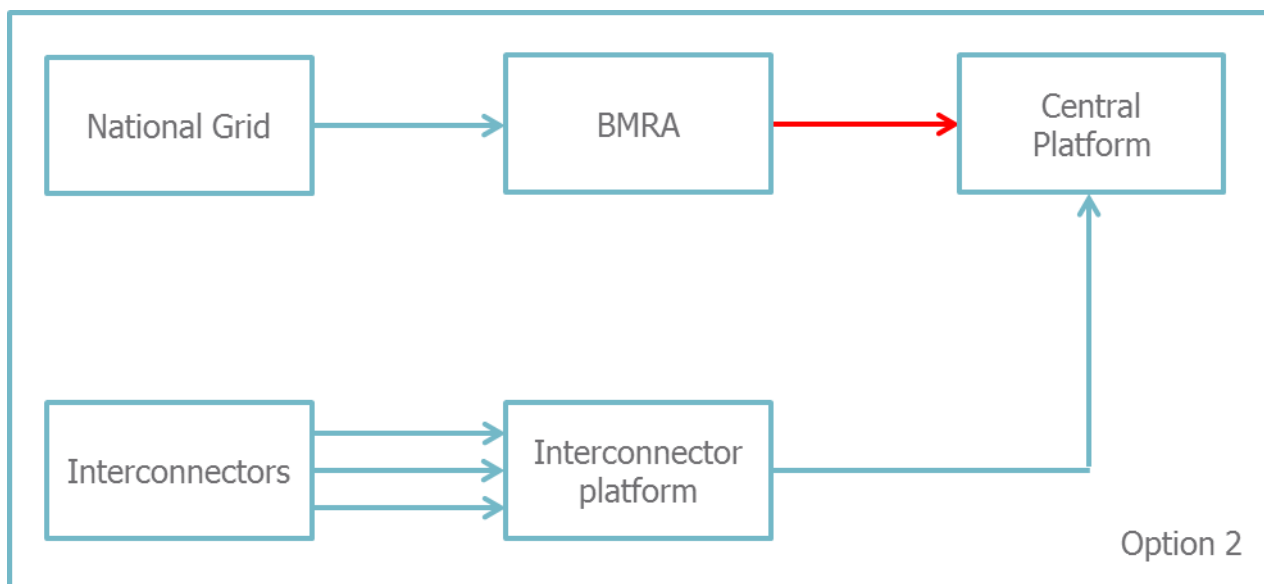
- **Sub-option a:** BMRS does not publish any of the data submitted to the Central Platform. This would have no BSC impact, and under a Modification would be the 'do nothing' option (from a BSC perspective); and
- **Sub-option b:** BMRS publishes the GB data submitted to the Central Platform, both the data from National Grid and from Interconnectors, by 'scraping' the data from the Central Platform. This would impact the BSC inasmuch as the scope of data reported on the BMRS would need to be modified and the necessary changes to scrape and publish the data would need to be made. However, these BSC changes would not be required to implement the Transparency Regulation requirements specifically, but would be associated only with the delivery of ancillary BMRS reporting.

2.5 Option 1 is shown in the diagram below; the sub-options are not illustrated.



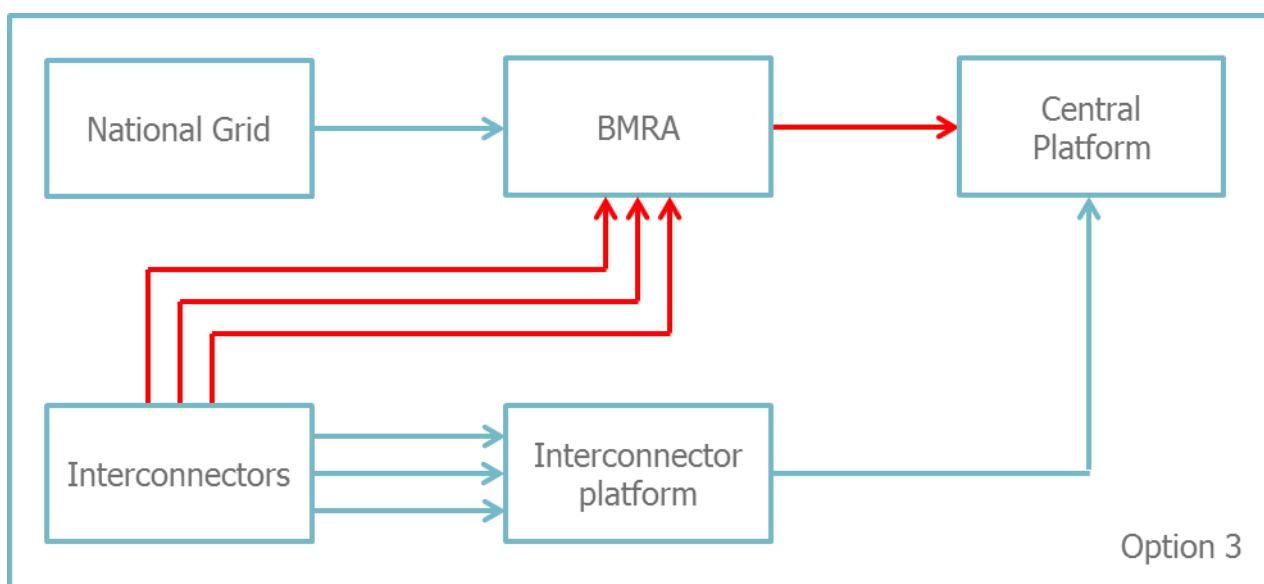
### Option 2: National Grid data to Central Platform via the BMRS

- 2.6 Under Option 2 National Grid would send data to the BMRS to be reported to the Central Platform, while Interconnectors would submit their data via the existing Interconnector Platform (outside the BSC).
- 2.7 The Group believed that under this option the BMRS should publish all the GB Transparency Data, i.e. both the data received directly from National Grid and the Interconnector data from the Central Platform, albeit that the Interconnector data would be caveated because it would be 'scraped' from the Central Platform by the BMRS. Option 2 is shown in the diagram below.



### Option 3: National Grid data to Central Platform via the BMRS, Interconnector data to BMRS

- 2.8 Under Option 3 National Grid would send data to the BMRS to be reported to the Central Platform, while the BSC would be amended to require Interconnectors to submit data to the BMRS. It is intended that the Interconnector data being received directly by BMRS would enable all the GB Transparency data to be published on the BMRS in the same timescales as the Transparency Platform, i.e. the BMRS would accurately report the GB Transparency information as reported on the Central Platform.



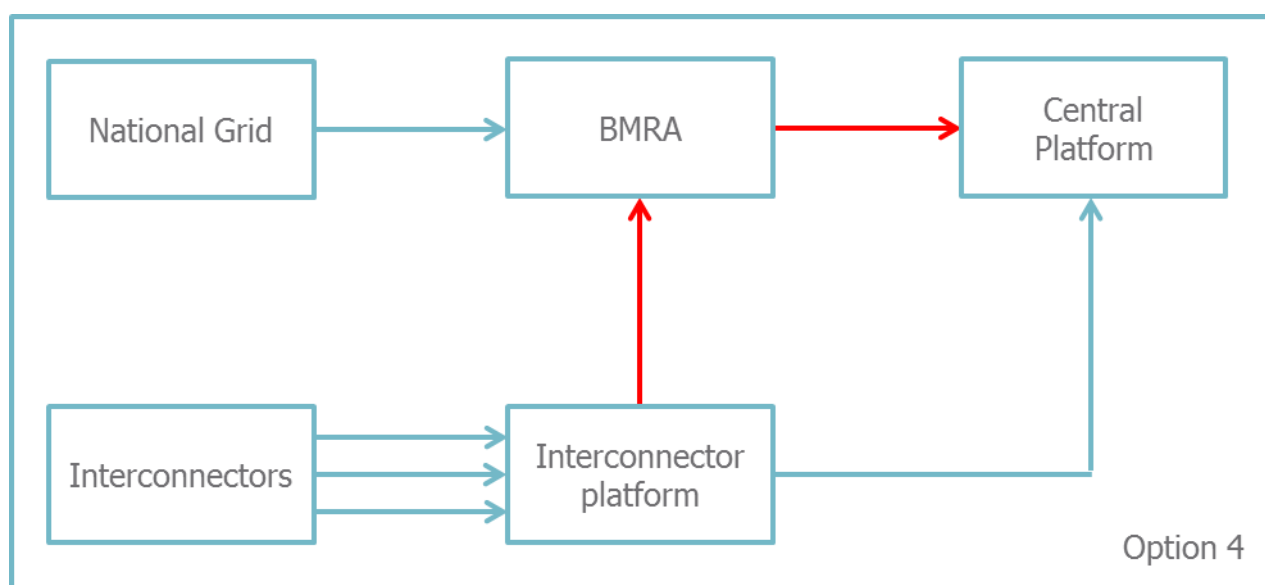
- 2.9 It remains to be determined whether BMRS would submit the Interconnector data to the Central Platform, or whether it would be submitted by the existing Interconnector Platform (and the



Interconnector data therefore only used by the BMRS for the purposes of BMRS reporting). Option 3 is shown in the diagram above.

### **Option 4: National Grid data to Central Platform via the BMRS, Interconnector data to BMRS from Interconnector Platform**

- 2.10 Under this final option National Grid would send data to the BMRS to be reported to the Central Platform, while Interconnector data would be sent from the Interconnector platform to both the Central Platform and the BMRS, to enable accurate reporting by the BMRS of all the GB Transparency data.
- 2.11 It is anticipated that Option 4 would have a lower impact than Option 3 while facilitating the same degree of accuracy in BMRS reporting with regard to Interconnectors' Transparency data. Option 4 is shown in the diagram below.



### **Summary of solution options**

- 2.12 The four solutions detailed above are set out in the table below. The red text indicates where the accuracy/timeliness of the data being reported on the BMRS is in question, due to the data concerned being taken from the Central Platform instead of being supplied to the BMRS directly.
- 2.13 The Group believed that these solutions should be given further consideration, but considered that it would be possible to determine the optimal solution only with an understanding of the impacts of the solutions and the views of industry (e.g. with regard to matters such as the need to report Interconnector data on the BMRS, etc.).
- 2.14 An expanded version of this table in Appendix 1 also presents the BMRS reporting sub-options which the Group considered in the interests of investigating all permutations, but ultimately agreed should not be taken forward.



Recommended solution options and sub-options				
New Reporting Solution		Interconnector Reporting Option	BMRS Publishes	
<b>1</b>	<ul style="list-style-type: none"> <li>National Grid data directly to Central Platform</li> </ul>	None	<b>a</b>	<ul style="list-style-type: none"> <li>Existing BMRS data only</li> </ul>
			<b>b</b>	<ul style="list-style-type: none"> <li>Existing BMRS data; and</li> <li>GB Transparency data ('scraped' from Central Platform)</li> </ul>
<b>2</b>	<ul style="list-style-type: none"> <li>National Grid data to Central Platform via the BMRS</li> </ul>	None	<ul style="list-style-type: none"> <li>Existing BMRS data;</li> <li>National Grid data; and</li> <li>Interconnector data ('scraped' from Central Platform)</li> </ul>	
<b>3</b>	<ul style="list-style-type: none"> <li>National Grid data to Central Platform via the BMRS</li> <li>Interconnector data to BMRS from Interconnectors</li> </ul>	Interconnector data to Central Platform via BMRS or from Interconnector Platform	<ul style="list-style-type: none"> <li>Existing BMRS data; and</li> <li>GB Transparency data (both NG and Interconnector data)</li> </ul>	
<b>4</b>	<ul style="list-style-type: none"> <li>National Grid data to Central Platform via the BMRS</li> <li>Interconnector data to BMRS from Interconnector Platform</li> </ul>	Interconnector data to Central Platform via BMRS or from Interconnector Platform	<ul style="list-style-type: none"> <li>Existing BMRS data; and</li> <li>GB Transparency data (both NG and Interconnector data)</li> </ul>	

### 3. Discussions of the Issue 47 Group

- 3.1 Ofgem has the power to direct that arrangements are put in place for the Transparency Regulation. However, it would prefer an industry led approach to implementing the Regulation and developing the GB central data provider for the Central Platform.
- 3.2 The Group considered that an approach to Transparency Regulation reporting in which ELEXON is the GB central data provider to the Central Platform, with data submitted via the BMRS and potentially also reported on the BMRS, was sensible in principle and could deliver benefits as a result of promoting clarity and efficiency in the reporting of GB Transparency Regulation data by making it available on the BMRS.
- 3.3 As well as data from National Grid, the GB Transparency Regulation data includes information from Interconnectors. Under the Transparency Regulation the Interconnector data is not required to be reported to the Central Platform via the GB central data provider. A platform for reporting Interconnector data exists, and it is anticipated that this Interconnector platform would be used to receive Transparency Regulation data from each Interconnector and submit collated data to the Central Platform.
- 3.4 However, the Group considered that, in order for reporting GB Transparency Regulation data on the BMRS to be useful, it must be as comprehensive and accurate as possible. Some of the Group felt that for the BMRS to be a viable alternative source of GB Transparency data for industry participants it must



report all the GB Transparency data, including Interconnector data. However, other members felt that data publication must be considered on a case-by-case basis. Submission of Interconnector data by means other than the BMRS would limit the ability of the BMRS to report GB Transparency Regulation data consistently with the GB data on the Central Platform.

- 3.5 The Group considered that the reporting of Interconnector data could be achieved either by the BMRS obtaining the data from the Central Platform ('scraping' the platform) or by Interconnector data being submitted to the BMRS (either by each Interconnector individually or by the Interconnector platform). These considerations led the Group to develop solution options 2-4, and it also believed that the submission of data direct from National Grid to the Central Platform needed to be considered (Option 1).
- 3.6 The Group discussed the relative benefits and drawbacks associated with these solution options, but considered that an optimal solution could not be determined without seeking the views of participants and impact assessing the options, which would be more appropriately done under a Modification. The Group therefore agreed that it could not recommend a single solution for progression via a Modification, but would instead present its preferred options and specify factors that it believed should be considered in the development and assessment of a Transparency Regulation solution under a Modification.
- 3.7 The Group noted that, while the possibility of scraping data from the Central Platform, under either Option 1b or Option 2, facilitates the reporting of more GB Transparency data under these options that would otherwise be possible, it gives rise to concerns around data inconsistency between the BMRS and the Central Platform. This calls into question how useful participants would find the additional data.
- 3.8 National Grid believed that an Option 1 approach, with National Grid submitting data directly to the Central Platform and bypassing ELEXON and the BMRS, would have the following disadvantages:
- Creation of another data channel (from National Grid to the Central Platform) when a channel already exists from National Grid to the BMRS;
  - Prevention of the publication of additional data on the BMRS, or BMRS publication by scraping from the Central Platform, causing concerns around timing and synchronicity of data;
  - The same data (outages) being submitted by National Grid to ELEXON under REMIT (under the arrangements proposed by P291, if approved) and to the Central Platform (for the Transparency Regulation), which also causes issues around timing and consistency of data; and
  - It is recommended that REMIT data is published on national centralised websites (i.e. BMRS under P291), but it is understood publication of REMIT data on the European Transparency Database is being considered (although not yet agreed) - if this is required, and P291 is approved, then even if National Grid submits its data directly to the Central Platform, there could be an additional requirement for ELEXON to submit REMIT data to the central platform as well.





- 3.9 It was considered that there could appear to be more potential for issues around data consistency to arise if REMIT is delivered by the BMRS under the arrangements proposed by P291 (if approved) but the Transparency Regulation is implemented using Option 1, compared with both REMIT and the Transparency Regulation being delivered using the BMRS. The Group noted these concerns, but believed that Option 1 should be considered as a possible approach to implement the Transparency Regulation.
- 3.10 National Grid believed that the BMRS receiving data from the Interconnector platform (Option 4) is a more feasible approach than individual Interconnectors submitting data to the BMRS (Option 3) for achieving reporting of Interconnector data on the BMRS. Option 3 would involve a change to require Interconnectors to submit data to the BMRS and practical impacts to enable them to submit the data, while under Option 4 changes would be required so the Interconnector platform can supply the same data to the BMRS as the Central Platform; it is anticipated that the latter would be lower impact.
- 3.11 The Group felt National Grid's views on the relative merits of Option 3 and Option 4 were reasonable, but believed that both the options required further consideration, along with the other options, in order to identify the best option. The Group acknowledged that Option 3 would be expected to meet with resistance from Interconnectors, who are unlikely to want to submit data to the BMRS that they already submit to the Interconnector platform. Given that the Interconnector platform already exists as a means of submitting Interconnector data to the Central Platform, it would also appear that it would be a challenge to justify the creation of parallel or replacement reporting to the BMRS.
- 3.12 The Group considered that to assess the solution options it is necessary to understand both:
- What data industry participants wish to see reported on the BMRS - none of the GB Transparency data, all of it or a sub-set (and whether this should include Interconnector data); and
  - The details of the various methods - BMRS scraping from the Central Platform, Interconnectors submitting data to the BMRS - in practice, in terms of areas such as timescales, consistency and reliability, as well as costs and lead times.

### Transparency Regulation gap analysis

- 3.13 Attachment A contains the gap analysis considered by the Group. The analysis was produced by ELEXON and National Grid based on National Grid's initial view of the interaction between NG systems and the Transparency Regulation. Since this is based on National Grid's initial view it could be superseded, but this is the analysis that was considered by the Group.
- 3.14 In addition, Appendix 2 contains National Grid's current implementation assumptions in relation to the Transparency Regulation. This is a work-in-progress and subject to change, but is included to give a view of National Grid's current thinking.
- 3.15 The gap analysis colour coding indicates, with respect to National Grid systems:
- Information that is currently published - green;





- Information that could be published with small system changes - amber; and
- Information that would require more significant changes to enable publication - red.

3.16 ELEXON added four columns (shown in grey within Attachment A) that analyse the gap between the Transparency Regulation and current BSC requirements, as follows:

- Column J identifies the section of the BMRS (if any) where equivalent data is currently published;
- Column K identifies the BSC reference for current equivalent data (if any);
- Column L is ELEXON's (somewhat subjective) assessment of how close the match is between Transparency Regulation requirement and current BSC requirement ('H' for High, 'M' for Medium, 'L' for Low or 'N' for None); and
- Column K is additional commentary on the match between the requirements.

3.17 Note that column L, which assesses the correlation between the Transparency Regulation and current BSC requirements, does not necessarily reflect the degree of impact of the changes on National Grid systems, e.g. a High correlation with current BSC requirements does not necessarily mean that only a small system change is needed to meet a new Transparency Regulation requirement.

## 4. Conclusions

4.1 The Issue 47 Group concluded that a BSC Modification should be raised to put in place arrangements to facilitate compliance with the Transparency Regulation and, potentially, reporting of some or all of the GB Transparency data on the BMRS. Such a Modification should include consideration of the solution options agreed by the Group, including the relevant merits of doing nothing under the BSC and National Grid submitting the information directly to the Central Platform (i.e. Option 1).

4.2 The Group recommends that the following areas should be considered as part of a Modification relating to the Transparency Regulation:

- The extent to which industry participants would want GB Transparency Regulation data to be reported on the BMRS (all GB data, a specific sub-set, or none)
- Industry participants views on whether or not Interconnector Transparency data should be included in BMRS reporting; and
- The requirements around BMRS reporting of Transparency data in order for it to be useful to participants (e.g. consistency with Central Platform, BMRS reporting timescales etc.).

4.3 The Group noted that, given that the Transparency Regulation will introduce reporting of quantities similar, but not exactly equivalent, to data items already reported on the BMRS, consideration may be



given under a separate Modification to removing existing data items from the BMRS where there is a similar Transparency item. This would streamline the reporting on the BMRS by removing redundant information in order to make reporting clearer to participants. However, the Group did not believe this should be done as part of a Modification seeking to deliver Transparency Regulation arrangements because such streamlining of BMRS reporting is not required to deliver Transparency Regulation arrangements, and its consideration as part of a Modification implementing the Transparency Regulation could extend the timescales of the progression of such a Modification.

### 5. Recommendations

5.1 We invite you to:

- a) **NOTE** the Issue 47 Group's discussions and conclusions;
- b) **NOTE** the Group's recommendation that a BSC Modification should be raised to consider reporting of Transparency Regulation data under the BSC;
- c) **NOTE** the other recommendations of the Group, including the issues and possible solution options that should be considered as part of a Transparency Regulation reporting Modification; and
- d) **NOTE** that Issue 47 is now closed.

#### List of Appendices:

Appendix 1: Full list of solution permutations

Appendix 2: National Grid implementation assumptions for Transparency Regulation

#### List of Attachments:

Attachment A: Transparency Regulation Gap Analysis

#### For more information, please contact:

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### Issue 47 Group membership and attendance

Name	Organisation	13/05/13	10/06/13
Dean Riddell	ELEXON (Chair)	✓	✓
John Lucas	ELEXON (Design Authority)	✓	✓
Zaahir Ganty	ELEXON (Design Authority)	✓	✓
Tina Wirth	ELEXON (Legal)	✓	x
Tariq Hakeem	National Grid (Proposer)	✓	✓
Richard Price	National Grid	✓	✓
Cem Suleyman	Drax	✓	✓
Bill Reed	RWE	✓	✓
Gary Henderson	IBM (Scottish Power)	✓	☎
Sarah Owen	Centrica	☎	✓
Esther Sutton	E.ON	x	✓
Paul McGuckin	Mutual Energy Ltd	x	☎
Aine Higgins Ni Chinneide	Ofgem	✓	x
Austin Sharman	Ofgem	✓	x



## Appendix 1: Full list of solution permutations

This table below sets out all solutions considered by the group, including those that were discarded for the reasons set out in this paper. The discarded options are indicated by the 'BMRS publishes' options shown in grey.

All permutations of solution options and sub-options				
New Reporting Solution		Interconnector Reporting Option	BMRS Publishes	
<b>1</b>	<ul style="list-style-type: none"> <li>National Grid data directly to Central Platform</li> </ul>	None	<b>a</b>	<ul style="list-style-type: none"> <li>Existing BMRS data only</li> </ul>
			<b>b</b>	<ul style="list-style-type: none"> <li>Existing BMRS data; and</li> <li>GB Transparency data ('scraped' from Central Platform)</li> </ul>
<b>2</b>	<ul style="list-style-type: none"> <li>National Grid data to Central Platform via the BMRS</li> </ul>	None	<b>a</b>	<ul style="list-style-type: none"> <li>Existing BMRS data only</li> </ul>
			<b>b</b>	<ul style="list-style-type: none"> <li>Existing BMRS data; and</li> <li>National Grid data</li> </ul>
			<b>c</b>	<ul style="list-style-type: none"> <li>Existing BMRS data;</li> <li>National Grid data; and</li> <li>Interconnector data ('scraped' from Central Platform)</li> </ul>
<b>3</b>	<ul style="list-style-type: none"> <li>National Grid data to Central Platform via the BMRS</li> <li>Interconnector data to BMRS from Interconnectors</li> </ul>	Interconnector data to Central Platform via BMRS or from Interconnector Platform	<b>a</b>	<ul style="list-style-type: none"> <li>Existing BMRS data</li> </ul>
			<b>b</b>	<ul style="list-style-type: none"> <li>Existing BMRS data; and</li> <li>GB Transparency data (both NG and Interconnector data)</li> </ul>
<b>4</b>	<ul style="list-style-type: none"> <li>National Grid data to Central Platform via the BMRS</li> <li>Interconnector data to BMRS from Interconnector Platform</li> </ul>	Interconnector data to Central Platform via BMRS or from Interconnector Platform	<b>a</b>	<ul style="list-style-type: none"> <li>Existing BMRS data</li> </ul>
			<b>b</b>	<ul style="list-style-type: none"> <li>Existing BMRS data; and</li> <li>GB Transparency data (both NG and Interconnector data)</li> </ul>



### Appendix 2: National Grid implementation assumptions for Transparency Regulation

This appendix summarises key assumptions identified by National Grid in relation to the published Transparency Regulation. These should be validated by industry participants, ELEXON and Ofgem prior to the implementation of the Transparency Regulation.

- **Article 6: Total load - forecasts and actual**

Actual demand is currently calculated as sum of generation. National Grid needs agreement on which generation should be included in the new total calculation. There are different possible criteria that could be used, for instance: all generation, generation greater than 1MW, generation which National Grid has knowledge of and includes in current forecasts, fuel types with more than 1% feed-in, etc.

For practical purposes, National Grid assumes for outturn that all metered generation will be included plus latest forecasts of smaller wind generation that it is aware of, and total aggregate latest solar generation forecasts. Forecasts of total load will be based on historical outturn and hence based on the same definition as outturn.

- **Article 7: Unavailability of Consumption Units (>100MW)**

At present National Grid is only aware of individual consumption units which are registered as BMUs with ELEXON. There may be others >100MW which are aggregated within existing Supplier BMUs. It will be the responsibility of individual companies with demand consumption >100MW to notify National Grid of planned unavailability and changes in actual availability for these units. National Grid can only publish unavailability data for consumption units that submit such data.

- **Article 8: Year ahead forecast margin**

In order to publish a consistent margin figure, the generation units included in all the generation, demand and capacity calculations will need to be the same, and the assumptions regarding thresholds, % feed-in and what is going to be included will need to be clearly stated and communicated for clarity and the avoidance of doubt. National Grid can calculate this parameter in a method consistent with the other generation and load forecasts in article 6.

- **Articles 9-10: Transmission Changes affecting Interconnector Capability**

Normally National Grid transmission infrastructure and outages changes will not affect interconnector capacity. Infrastructure changes are already published in National Grid's Ten Year Statement (TYS).



- **Articles 11-13: Interconnector Capacities and Congestion Management**

Most of this information should be provided by Interconnector parties via existing publication routes. Normally National Grid balancing actions will not affect Interconnector capacity.

- **Article 14: Forecast generation and generation capacity**

This should be consistent with other generation information in Articles 6, 8, 16. Some of this information is contained in National Grid's Ten Year Statement (TYS). Separate day ahead forecasts are required for wind and solar (>1% feed-in for GB).

- **Article 15: Generation availability changes (with reasons)**

Immediate notifications and publication of availability changes (within one hour). This overlaps with REMIT requirements. It will require additional information from Generating companies, i.e. notification of changes within one hour, and additional fields such as reason codes. National Grid will be dependent on external parties to provide this information for publication.

- **Article 16: Actual Generation**

This should be consistent with other generation information in Articles 6, 8, 14, subject to the >100MW filter. Hydro filling rates are not applicable to GB because there is <10% feed-in of Hydro generation.

- **Article 17: Balancing**

This is generally information already held by National Grid. It will probably not require any new information from external parties. Some parameters are already published on BMRS, e.g. imbalance prices and volumes. Some is already published on National Grid's website as PDF report files, e.g. Balancing Rules. Items 1 d) & e) look the same unless d) "accepted" is interpreted as submitted rather than activated.