

Stage 03: Assessment Report

P295 'Submission and publication of Transparency regulation data via the BMRS'

The EU Transparency regulation requires primary data owners to submit information to their Transmission System Operator, or a third party acting as a data provider, for publication on a central European reporting platform.

P295 proposes that ELEXON, through the BMRA, is made the GB data provider for all data that the Transmission Company is required to submit to the Electricity Market Fundamental Information Platform, with all of this data also being published on the BMRS.



The P295 Workgroup recommends **Approval** of P295



High Impact:

- Balancing Mechanism Reporting Agent (BMRA)
- Transmission Company



Low Impact:

- ELEXON
- BSC Parties

What stage is this document in the process?

- 01 Initial Written Assessment
- 02 Definition Procedure
- 03 Assessment Procedure
- 04 Report Phase



Any questions?

Contact:
Talia Addy



talia.addy@elexon.co.uk



020 7380 4043

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About this Document

This document is the P295 Workgroup's Assessment Report to the BSC Panel. ELEXON will present this report to the Panel on 14 November 2013. The Panel will consider the Workgroup's recommendations, and agree an initial view on whether this change should be made. It will then consult on this view before making its final recommendation to the Authority on 12 December 2013.

There are three parts to this document.

- This is the main document. It provides details of the solution, impacts, costs and proposed implementation approach. It also summarises the Workgroup's key views on the areas set by the Panel in its Terms of Reference.
- Attachment A contains the draft redlined changes to the BSC for P295.
- Attachment B contains the full non-confidential responses to the Workgroup's Assessment Procedure Consultation.

For further information, please see the [P295](#) page of the ELEXON website.

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Why Change?

The EU Transparency regulation requires primary data owners to submit information to their Transmission System Operator, or a third party acting as a data provider, for publication on a central European reporting platform.

Arrangements to deliver the Transparency regulation must be implemented no later than 4 January 2015.

Solution

P295 proposes to amend the BSC so that ELEXON is made the GB data provider for all the information that the Transmission Company is required to submit to the EMFIP under the Transparency regulation. Under the proposed solution, the Transmission Company would submit the required data to the BMRA. The BMRA would then submit the data to the ENTSO-E for publication on the EMFIP, and would also publish it on the BMRS.

Impacts & Costs

P295 will have a minimal impact on BSC Parties. The main impacts will be on the BMRA, the Transmission Company and ELEXON.

The central implementation cost of P295 is approximately £645k, comprising £520k in BMRA costs, £25k in ELEXON effort and £100k in Transmission Company costs. Individual Party costs range from minimal up to £100k in order to receive the new information over TIBCO.

Implementation

P295 is proposed for implementation on 16 December 2014, if the Authority's decision is received on or before 22 January 2014.

Workgroup's Recommendation

The Workgroup believes that P295 would better facilitate Applicable BSC Objectives (b), (c) and (e), and therefore unanimously recommends that P295 is approved.

What is the Transparency regulation?

The regulation on submission and publication of data in electricity markets (the Transparency regulation) (Regulation (EU) No 543/2013)¹ is a legally binding EU regulation that came into force on 4 July 2013. Under this regulation, primary data owners will be required to submit a number of data items to their Transmission System Operator (TSO) (or to a third party acting as a data provider with the prior agreement of the TSO) for publication on a central information platform known as the Electricity Market Fundamental Information Platform (EMFIP). This platform will be operated by the European Network of Transmission System Operators for Electricity (ENTSO-E).

The Transparency regulation places obligations on TSOs, Distribution System Operators (DSOs), generators and large consumers to submit information for publication on the EMFIP. These participants will be required to submit additional data to that which is already submitted under various other GB industry requirements, such as the regulation on wholesale energy markets integrity and transparency (REMIT) (Regulation (EU) No 1227/2011)² and the European Network Codes, which are being developed under Article 6 of the regulation on conditions for access to the network for cross-border exchanges in electricity (Regulation (EC) No 714/2009)³. Under Article 5 of the Transparency regulation, ENTSO-E is developing a Manual of Procedures to set out the details and formats for the submission of data to the EMFIP, including standard submission methods and technical details that data providers must meet.

The Transparency regulation was published in the Official Journal of the European Union on 14 June 2013, and came into force on 4 July 2013, 20 days after publication. There is an 18 month implementation period commencing from this date to implement the arrangements that will deliver the Transparency regulation. This means that the arrangements delivering the Transparency regulation must be implemented no later than 4 January 2015.

What is the BMRS?

The Balancing Mechanism Reporting Service (BMRS) is a service for publishing and reporting data relating to the Balancing Mechanism, Settlement and the market in general. This includes data provided by the Transmission Company relating to balancing actions and indicative data relating to Balancing and Settlement, including indicative data for each Settlement Period shortly after its completion. All of the data published on the BMRS is indicative data, calculated from the information available at the time, and is not used within Settlement, but its publication helps to facilitate the operation of the GB electricity market. Market participants can choose to receive the information via a 'high-grade' service, where the information is sent to them directly via a TIBCO feed, or they can use the 'low-grade' service, the BMRS website⁴. The low-grade service is freely available to anyone.

In a similar fashion to the data currently published on the BMRS, the information required under the Transparency regulation would not be used in Settlement. However, it may be beneficial to market participants if this additional information was made available alongside

¹ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF>

² <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:326:0001:0016:EN:PDF>

³ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0015:0035:EN:PDF>

⁴ <http://www.bmreports.com/>

the existing data published on the BMRS, allowing more comprehensive information to be available from a single source.

Previous discussions on the Transparency regulation

Issue 47

[Issue 47 'GB Implementation of the European Transparency Regulation'](#) was raised by National Grid in April 2013 in order to facilitate discussions on how the requirements of the Transparency regulation could be implemented within GB. The Issue 47 Group examined what data would be required to be reported under the Transparency regulation, how this data should be reported and what changes would be required to implement the relevant solution.

The Issue 47 Group came up with four potential solutions to the issue:

- 1) The Transmission Company would submit the data straight to the ENTSO-E. There were two sub-options to this solution relating to BMRS reporting:
 - a) No changes to BMRS reporting (which would result in no BSC impact); or
 - b) The BMRA would 'scrape' the additional data from the EMFIP and publish it on the BMRS.
- 2) The Transmission Company would submit the data to the BMRA, who would submit the data to the ENTSO-E and publish it on the BMRS. Interconnector data would be 'scraped' from the EMFIP and reported on the BMRS.
- 3) The Transmission Company would submit the data to the BMRA, who would submit the data to the ENTSO-E and publish it on the BMRS. In addition, Interconnectors would submit their data to the BMRA, who would publish this on the BMRS.
- 4) The Transmission Company would submit the data to the BMRA, who would submit the data to the ENTSO-E and publish it on the BMRS. In addition, the Interconnector Platform would submit Interconnector data to the BMRA, who would publish this on the BMRS.

Further detail on each solution is available within the Issue 47 Group's Issue Report⁵. The Issue 47 Group was unable to come to a conclusion as to which solution should be progressed, and recommended that all of these options be considered as part of any Modification that was raised to progress and implement the Transparency regulation arrangements.

P295 proposed to progress Solution 2 without the Interconnector data reporting element. However, as part of its consideration of P295, the P295 Workgroup has considered all of the options put forward under Issue 47.

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⁵ The Issue 47 Report can be found on the [Issue 47](#) page of the ELEXON website.

Overlap with P291

[P291 'REMIT Inside Information Reporting Platform for GB Electricity'](#) was raised by SSE Energy Supply Ltd in January 2013. P291 sought to implement a central reporting platform on the BMRS for the GB electricity market to report the information required under REMIT. P291 was approved by the Authority on 16 August 2013 for implementation on 31 December 2014.

During its discussions, the P291 Workgroup noted that much of the data required under the REMIT regulation in relation to outages would also be required under the Transparency regulation. Although P291 was raised in response to the REMIT regulation, the P291 Workgroup developed the proposed solution to allow for overlapping requirements of the Transparency regulation. This would mean that only minor changes would be required to the P291 solution in order to adapt it for reporting the relevant information to the EMFIP under P295, such as renaming data items to align with the terminology used within the Transparency regulation. It should be noted that the P291 solution was made optional for BSC Parties, as there is no requirement under the REMIT regulation to use a central reporting platform, only a preference.

The P295 Workgroup notes that P295 will not impact the BSC aspects of the approved P291 solution i.e. it would continue to remain optional for participants to submit Inside Information Messages for publication on the BMRS, as defined under the P291 approved solution. However, the relevant Grid Code flows would be updated to cater for both the P291 and P295 solutions, in order to provide the mandatory data required under the Transparency data, while offering the option to simultaneously submit a REMIT message to the BMRS should the participant so wish.

What is the issue?

The Transmission Company is required to ensure that the data specified in the Transparency regulation is published on the EMFIP. The Proposer considers that it would be prudent to make ELEXON the data provider for this data under Article 4(2) of the Transparency regulation, as this would have a number of benefits highlighted below. However, there is currently no mechanism under the BSC that would allow ELEXON to assume this role of GB data provider.

The Proposer notes that some of the data required under the Transparency regulation is already submitted to ELEXON. Using ELEXON as the data provider would negate the need for creating a second data channel between the Transmission Company and the ENTSO-E for the same data. In addition, much of the data that the Transmission Company currently submits to ELEXON is published on the BMRS, so the additional data required under the Transparency regulation would be incremental to this, and would allow this data to be displayed in a format that is already accessible to BSC Parties. The Proposer also notes the synergies between the data required under the REMIT regulation and the Transparency regulation highlighted above.

The Proposer highlights that the BMRS has grown and evolved as a data publication platform to provide GB market participants with equal access to data, even when this data is not used within Settlement. The publication of this data will allow for further transparency in the market and will provide further information to assist market participants in making decisions that could have an impact on balancing and settlement.



Modification Proposal Form

A copy of the Proposer's Modification Proposal Form can be found on the [P295](#) page of the ELEXON website.

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In addition, making ELEXON the GB data provider would allow the data submitted via ELEXON under the Transparency regulation to fall under BSC governance, allowing BSC Parties to determine how much of this data should be published on the BMRS and the requirements for this.

Summary

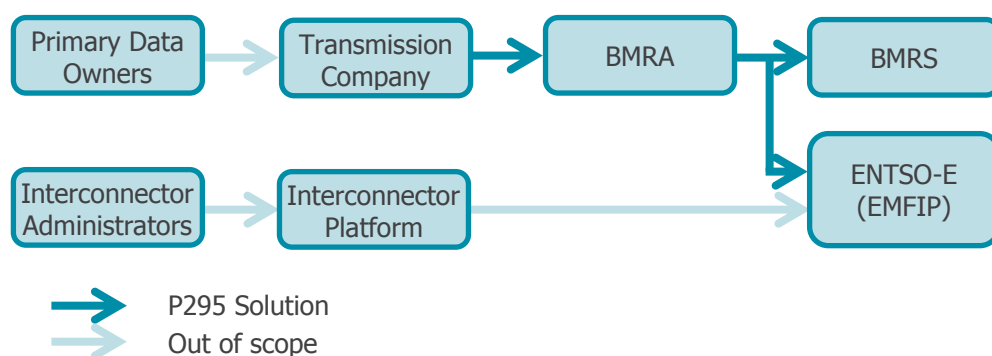
P295 proposes to amend the BSC so that ELEXON is made the GB data provider for all the information that the Transmission Company is required to submit to the ENTSO-E under the Transparency regulation. Under the proposed solution, the Transmission Company would submit the required data to the Balancing Mechanism Reporting Agent (BMRA). The BMRA would then submit the data to the ENTSO-E for publication on the EMFIP. It should be noted that the BMRA would not receive any Transparency data direct from primary data owners, unless this data is already submitted under the BSC. Primary data owners (which will include both BSC and non-BSC Parties) would submit their data to the Transmission Company, who would send it on to the BMRA.

The P295 Workgroup believes that it would be beneficial to the industry to publish all the required Transparency regulation data received by the Transmission Company on the BMRS. Therefore, the BMRA would also publish all of this information on the BMRS.

Some of the information currently submitted by the Transmission Company to the BMRA for BSC purposes would be required to be submitted to the ENTSO-E. For these data items, the BMRA would forward the information on to the ENTSO-E and would continue to publish the information on the BMRS as it currently does.

The P295 solution will exclude any data that Interconnector Administrators are required to submit to the ENTSO-E under the Transparency regulation. Interconnector Administrators will continue to be required to submit their information only to the ENTSO-E, and this information will not be displayed on the BMRS.

It has been highlighted that there will be some duplication between the data currently being published on the BMRS and the data that will be added by P295. However, P295 would not look to amend or remove any of the data currently published. It was agreed that rationalisation of the data is not within scope of P295 and could be facilitated by a separate Modification Proposal instead.



Legal text

The proposed redlined changes to the BSC to deliver the P295 solution can be found in Attachment A.

Are there any potential alternative solutions for P295?

During its discussions on the GB implementation of the Transparency regulation, the Issue 47 Group came up with four potential solutions, as outlined in Section 2. The Group were unable to come to a conclusion as to which solution should be progressed, and recommended that all of these options be considered as part of any Modification that was raised to progress and implement the Transparency regulation arrangements.

The P295 Workgroup began by considering Solution 1. One Workgroup member considered that it would be more practical for the Transmission Company to submit the information directly to the ENTSO-E, as this solution proposed. The Proposer responded that it would be more beneficial to submit the information via the BMRA. Much of the information required under REMIT, which will be submitted to the BMRA under P291, overlaps with information required under the Transparency regulation. It would therefore make sense to utilise the existing data link between the Transmission Company and the BMRA. Furthermore, this would allow the information to be published on the BMRS website under BSC governance, allowing BSC Parties a greater say on how the data is provided. A majority of Workgroup members agreed that it would be beneficial for the information to be available on the BMRS.

It was also noted that the defect identified by P295 is that there is currently no mechanism in place that would allow ELEXON to assume the role of GB data provider. Therefore, although Solution 1a was considered by the Workgroup as part of the wider picture, members noted that it would not fix the defect identified by P295, and so could not be put forward as a solution to this Modification. However, the Workgroup deemed it prudent to assess this solution in parallel with the viable P295 solutions on the basis that, if P295 is rejected, this approach would need to be implemented in order to ensure compliance under the Transparency regulation, as the BMRA would be considered a primary data owner and would therefore need to submit the required data to the Transmission Company. This would be a relatively minor change to the BSC, and by obtaining the costs, impacts and lead times now, any subsequent Modification raised to implement this approach could be progressed very quickly in the event that P295 is rejected.

The Workgroup then considered Solutions 2, 3 and 4 from Issue 47, which proposed different ways to obtain Interconnector Transparency data for publication on the BMRS. Several members considered that the option to scrape this information back from the EMFIP would be inefficient, and would mean that the BMRS would not receive this data until after it had been published on the EMFIP. This would mean having the data on the BMRS would offer little value, as participants would likely source the information from the EMFIP first. The Workgroup therefore agreed not to consider Solution 2 any further.

It was noted that the Issue 47 Group had expressed a preference for Solution 4, where Interconnector information would come from an Interconnector Platform. However, the BSC would only be able to place an obligation on the Interconnector Administrators themselves, and not any third parties used by them. It was agreed that a combination of Solutions 3 and 4 would therefore be the most effective means of obtaining the Interconnector Transparency data for publication on the BMRS.

The Workgroup considered raising this as a potential alternative solution to P295. Under this solution, the Transmission Company would submit the required data to the BMRA, who would then submit it to the ENTSO-E and publish it on the BMRS, as per the proposed solution. In addition to this, Interconnector Administrators would submit the required Interconnector Data to the BMRA, in parallel with submitting this data to the ENTSO-E. The BMRA would then publish this data on the BMRS.

Some Workgroup members believed that expanding P295 to include the reporting of Interconnector Transparency regulation data on the BMRS would be beneficial to the industry, as all GB Transparency regulation data would be available alongside the existing data already available on the BMRS. The Workgroup believed that this solution would be the most efficient of the three solutions considered by the Issue 47 Group for publishing Interconnector data on the BMRS. It therefore elected to obtain details on the impacts and costs associated with this potential alternative solution and seek industry views via the P295 Assessment Consultation before deciding whether to put it forward as an Alternative Modification to P295.

The majority of respondents to the P295 Assessment Consultation believed that the Workgroup's potential alternative solution should not be put forward as an Alternative Modification to P295, for the reasons outlined below. The Workgroup noted these views and consequently agreed not to raise it.

The Workgroup therefore concluded that there are no alternative solutions to P295 that would better facilitate the Applicable BSC Objectives than the proposed solution.

Further information on the Workgroup's wider discussions on the solutions can be found in Section 6.

Industry Impact Assessment respondents' views on alternative solutions

The majority of respondents to the P295 Industry Impact Assessment noted that the implementation of the Workgroup's potential alternative solution would have an adverse impact on Interconnector Administrators.

It was noted that this solution would place an additional obligation on Interconnector Administrators to submit Transparency regulation data to the BMRA. One respondent believed that this is not required to ensure compliance under the Transparency regulation. Other respondents indicated that this solution would create unnecessary additional cost in requiring new processes and data feeds to be developed in order for Interconnector Administrators to submit the required data to the BMRA. It was also noted that this would lead to an unnecessary duplication of effort and data, and that Interconnector Transparency data would already be available on the EMFIP. Another respondent stated that the intent of the Transparency regulation is to publish all information in one place (i.e. the EMFIP), and so the appropriate place for Interconnector Transparency data to reside is on the EMFIP and not the BMRS.

One respondent considered a potential alternative solution where Interconnector Administrators could choose to create an interface with the BMRA at any time to publish data on the BMRS. However, the Workgroup believed that making this requirement optional would not be a viable solution, as the Interconnector data on the BMRS would likely be incomplete should some Interconnector Administrators subsequently elect to submit only some, or even none, of their data to the BMRA.

Another respondent believed that the requirement of the Transparency regulation is for data owners to submit data directly to the EMFIP, and that if ELEXON was to provide the data on behalf of Interconnector Administrators then a legal framework would be required. The Workgroup emphasised that it is not, and never was, the intent of any potential alternative solution for the BMRA to submit Interconnector transparency data to the ENTSO-E, only to publish it on the BMRS.

No other respondents to the P295 Industry Impact Assessment identified any further potential alternative solutions to P295.

You can find the full responses to the Industry Impact Assessment on the [P295](#) page of the ELEXON website.

Assessment Consultation respondents' views on alternative solutions

The majority of respondents to the Workgroup's Assessment Consultation, including all Interconnector Administrators, believed that the Workgroup's potential alternative solution should not be progressed, for the reasons highlighted during the Industry Impact Assessment that it would have a detrimental impact on Interconnector Administrators. One respondent also highlighted that Interconnector data is also available through the FUI Portal⁶.

All respondents to the P295 Assessment Consultation believed that the Workgroup had considered all the possible solutions to P295, and were satisfied that there were no further potential alternative solutions.

You can find the full responses to the Assessment Procedure Consultation in Attachment B.

⁶ <http://www.fui-portal.eu/>

Estimated central implementation costs of P295

The total central implementation cost for P295 is approximately £645k. This comprises of:

- Approx. £520k in BMRA effort;
- Approx. £25k in ELEXON effort; and
- Approx. £100k in Transmission Company effort.

The BMRA costs are to enable the receipt of required Transparency regulation data from the Transmission Company and for this data to be forwarded on to the ENTSO-E and published on the BMRS. The ELEXON effort is required to register as a data provider for Transparency data, to update the relevant documents for P295 and to oversee the implementation project. The proposed solution will also require the Transmission Company to update its systems to forward the required data on to the BMRA.

In addition to the central implementation costs associated with P295 there will be approximately £5k per year in ongoing BMRA costs.

Please note that the BMRA costs for P295 are 'worst-case-scenario' costs. Further information is required from the Transmission Company on the structure of the flows that it will send to the BMRA under P295, and this information is being sought. In the interim, assumptions have been made for this missing information on a 'worst-case-scenario' basis in order to provide these costs. The same is true for the lead times for P295 (see Section 5). It is expected that, by using 'worst-case-scenario' assumptions, the final BMRA costs and lead times for P295 will likely be smaller than those indicated in this document.

Indicative industry costs and impacts of P295

Respondents to the Industry Impact Assessment stated that they would be impacted by P295 if it is decided that the BMRS will report new data items, or revise existing data items. In particular, they would need to amend their systems to account for the new information being published on the BMRS and submitted via TIBCO (see below for more information on the TIBCO impacts). These respondents noted costs ranging from minimal up to £100k to implement these changes.

One respondent noted that they would be impacted by the need to submit the Transparency data to the Transmission Company to meet the requirements of the regulation. It should be noted that this aspect of the regulation lies outside the scope of P295, which only seeks to implement a method by which the Transmission Company can submit its data to the ENTSO-E. Primary data owners will be required to submit their data to the Transmission Company irrespective of P295, and it is anticipated that these obligations will fall under the Grid Code.

How will P295 impact TIBCO?

As part of the BMRS High Grade Service, participants can elect to receive data published on the BMRS via a direct TIBCO feed to their own systems. If approved, P295 will add a significant amount of additional information to the TIBCO data feed.

Under P295, the BMRA will receive the Transparency data from the Transmission Company in XML format. It is the intent that this data will be issued over TIBCO with a subject line and message content structure in XML, as this will require significantly less central effort than transforming this data into the standard TIBCO format.

Participants who wish to receive the Transparency data published on BMRS over TIBCO will need to make the appropriate amendments to their systems in order to receive the data in XML. However, these changes are optional, and are only required if participants wish to receive the Transparency data. Any participant who receives data via TIBCO who does not wish to receive Transparency data will continue to receive all existing data as they currently do without needing to amend their systems.

Respondents to the Industry Impact Assessment based their response on the assumption that the Transparency data would be broadcast in the existing format. ELEXON has sought to contact all participants who receive TIBCO data to ascertain if P295 would have a greater impact on them if this data is sent over TIBCO in XML, but no participants have indicated that this would be the case.

P295 impacts

Impact on BSC Systems and process

BSC System/Process	Impact
BMRA/BMRS	The BMRA will be required to forward the data it receives from the Transmission Company to the ENTSO-E and publish it on the BMRS.

Impact on BSC Parties and Party Agents

Minimal or no impact is anticipated on BSC Parties and Party Agents depending on whether system changes would be required to accommodate changes to the TIBCO feed.

Impact on Transmission Company

The Transmission Company will be required to provide the data required under the Transparency regulation to the BMRA.

Impact on ELEXON

Area of ELEXON	Impact
Release Management	ELEXON will manage the implementation project.
Procurement	ELEXON will need to register as a data provider under the Transparency regulation. This would be carried out following approval of P295.

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Impact on Code	
Code Section	Impact
Section Q	Changes will be required to implement P295. The proposed changes can be found in Attachment A.
Section V	
Section X Annex X-1	

Impact on Code Subsidiary Documents	
CSD	Impact
BMRA Service Description	Changes will be required to implement P295. These will be prepared following approval of P295.
BMRA User Requirements Specification	
NETA Interface Definition Document	

Recommended Implementation Date

The arrangements for delivering the Transparency regulation must be implemented no later than 4 January 2015. Therefore, the Workgroup recommends an Implementation Date for P295 of:

- **16 December 2014** if the Authority's decision is received on or before 22 January 2014.

The lead time is driven by the time required by BSC Agents to make the necessary system changes to facilitate the implementation of P295. The lead times indicated by respondents to the Industry Impact Assessment are all shorter than this.

Workgroup's consideration of the Implementation Date

The P295 Workgroup originally recommended an Implementation Date for P295 of 31 December 2014. This was primarily driven by P291, which would also impact the BMRS and TIBCO, and which has been approved for implementation on 31 December 2014. The Workgroup therefore considered that it would be more efficient if P295 was implemented in parallel with P291, and consulted upon this approach as part of its Assessment Consultation.

The Workgroup noted a concern raised by one respondent to the Assessment Consultation over the proposed 31 December 2014 Implementation Date. The respondent stated that the proposed date was not a good date for the system changes required under P295 to 'go live' for the first time. They recommended that a revised Implementation Date be put forward which would allow the changes to be implemented before Christmas.

One Workgroup member, who agreed with this view, was concerned that participants may not have sufficient resource available around the holiday period to make sure their systems are able to receive the Transparency data via TIBCO. The member suggested to the Workgroup that an earlier Implementation Date be chosen so that, if approved, P295 would be implemented before Christmas 2014. Other members of the Workgroup agreed with this view. However, it was noted that there should not be major system changes required to enable a participant's internal systems to receive Transparency data, and that participants will already need to implement similar system changes on 31 December 2014 for P291. It was also stated that, like other Modifications with system impacts, these changes are tested prior to the 'go live' dates, so the risk of something going wrong should be minimal.

It was noted that the lead time indicated for the P295 proposed solution was 44 weeks, which would allow the proposed Implementation Date for P295 to be brought forward by two weeks. The Workgroup therefore agreed that, due to the concerns raised by the industry, the Implementation Date should be brought forward, and recommends an Implementation Date for P295 of Tuesday 16 December 2014.

Workgroup's consideration of a two-phased implementation approach

The P295 Workgroup also considered the potential for a two-phased implementation approach for P295. This was due to the large lead times originally indicated by BSC Agents to make the necessary system changes, which might have been too large for all aspects of the solutions to be implemented before 4 January 2015.

Under a two-phased approach, all parts of the solutions required for compliance with the Transparency regulation would be prioritised, with those parts not required for compliance (such as the publication of Transparency regulation data on the BMRS) left for the second phase. The Workgroup sought the costs and lead times associated with such an approach from BSC Agents in parallel with its Assessment Consultation.

Respondents to the Assessment Consultation noted a strong preference that P295 is implemented in a single one-phase approach, with all aspects of the solution implemented together. However, some respondents considered the proposed two-phased approach to be prudent if this was not possible.

Following the receipt of further information on the P295 data flows during the Assessment Consultation, the lead time for a single implementation approach was reduced, which meant that it was now possible to implement P295 in its entirety before the 4 January 2015 deadline. Therefore, as the Workgroup considers that a single implementation approach would be the most efficient and cost-effective option to implement P295, it elected not to consider the two-phased approach any further.



Should Transparency regulation data be published on the BMRS?

The Workgroup has considered the benefits and industry impacts of publishing the GB Transparency regulation data on the BMRS.

The Workgroup was generally in agreement that publication of the Transmission Company's data on the BMRS would be beneficial. The majority of discussions were centred around requiring Interconnector Administrators to submit the required Transparency regulation data to the BMRA, in parallel with submitting it ENTSO-E, for publication on the BMRS, as proposed by the potential alternative solution. It was noted that there is currently no Interconnector Administrator data published on the BMRS, and that there is no public GB platform that provides this information, though some Interconnector data is available on the FUI Portal website.

One Workgroup member considered that there would be benefit to the industry in publishing Interconnector Transparency regulation data on the BMRS. They believe that traders need as much information as possible to give them an accurate picture of what is happening in the industry when they trade, and so the more information that is available the better. The publication of Interconnector Transparency regulation data under the potential alternative solution would help to enable this, as it would make more information available for traders to use when making decisions. However, they accepted that doing so would have impacts on Interconnector Administrators. Concerns were also noted over the reliability of the EMFIP as a data reporting platform at this time (see below), and members could therefore see the benefits of publishing this information on the BMRS.

Another member noted that the majority of people wanting to obtain Interconnector Administrator data would find it more useful to look at all Interconnector data, and not just the data that is related to the GB market. Despite these views, the member was able to see benefit in publishing the Interconnector outage data on the BMRS.

One member was concerned about the duplication and alignment of Interconnector data. They noted that Interconnector Administrators already submit comprehensive data to the EMFIP, and so felt it would be inefficient to also send this data to the BMRA. The member could not see how the additional costs (on both Interconnector Administrators and ELEXON) associated with the publication of this data could be justified. They did not believe that an obligation should be placed on Interconnector Administrators to provide Transparency regulation data to the BMRA. If the BMRA has the facility to publish this data, Interconnector Administrators should have the opportunity to publish it without an obligation. For these reasons, the member was not in favour of this alternative solution.

Other Workgroup members noted that if no obligations were placed on Interconnector Administrators to provide this information, and it was left voluntary, then there was a risk of incomplete data being published. Some Interconnector Administrators may choose to submit only some, or even none, of their data, or submit it under much longer timescales. Incomplete data would be of little use to the industry, which would weaken the argument for publishing it on the BMRS. These members felt that if Interconnector data was to be published on the BMRS, the requirement for Interconnector Administrators to submit must be an obligation to ensure completeness.

The Workgroup discussed the possibility of scraping Interconnector Transparency regulation data from the EMFIP, rather than receiving it directly from Interconnector Administrators. This solution had been considered under Issue 47. However, some Workgroup members did not agree with this approach as it was not the most efficient way

Recommendation

The Workgroup recommends that P295 is approved.

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to obtain the data. They consider there to be risks with the accuracy and the timing of scraping this data in this manner, noting that there would be delays in the publication of this data on the BMRS as it would rely on pulling the data from the EMFIP. The Workgroup therefore agreed not to look at this potential solution any further.

What wider impacts could P295 have on Interconnector Administrators?

A concern was highlighted that the implementation of P295 could interfere with the ability of Interconnector Administrators to comply with the Transparency regulations. However, the Workgroup emphasised that its potential alternative solution has no intention of interfering with Interconnector Administrators' compliance. It only sought to obtain Interconnector Transparency regulation data for publication on the BMRS. The intent of the solution was that Interconnector Administrators would simply forward on the exact same file they would send to the ENTSO-E to the BMRA in parallel. The BMRA would then process the file in its systems. It was believed that the format of the files that would be submitted by Interconnector Administrators would be the same as those submitted by the Transmission Company, in compliance with the requirements set out by ENTSO-E, which the BMRA systems would be set up to process under the proposed solution.

One member queried what effects publishing this data on the BMRS could have on cross border trade, and whether or not there needed to be consideration given to a GB Interconnector Administrator's European counterpart, such as whether there would need to be an agreement in place between the two in order for the GB Interconnector to provide the required information to the BMRA. It was noted by another member that the obligation to submit the Transparency regulation data to the BMRA would fall on the GB Interconnector Administrator, as this would be an obligation required of them under the BSC.

Another member had concerns around the possibility of a central European auction management platform being introduced. They believe that the impacts of this need to be considered, as it may result in Interconnector Administrators having to rely on a potential central platform to submit this data on their behalf. It is not definite that such a platform would have the facility to submit the required data. It is also unsure whether the owner of such a platform would be willing to do so. The member questioned whether this would result in Interconnector Administrators being unable to comply with the BSC obligation of submitting Transparency regulation data to the BMRA.

Other members noted that the addition of a central European auction management platform is not certain at this time. They believe that there is a risk of basing a decision on a potential central platform whose requirements are currently unknown. One Workgroup member highlighted that if the industry was to take into account every possible future system and software developments, there would be no scope to develop anything. Until the requirements for such a central platform are confirmed, the industry should develop solutions based on the current baseline. In any event, the obligation to provide the data would be on Interconnector Administrators; how they discharge that obligation would be up to them. The Workgroup agreed to consult the industry on this question as part of its Assessment Consultation

Assessment Consultation respondents' views on the impacts of a central European auction management platform

The majority of respondents believed that the introduction of a central European auction management platform would impact Interconnector Administrators' ability to submit Transparency data to the BMRA. They note that this platform would become responsible for many of the tasks currently undertaken by individual Interconnector Administrators, including the submission of the relevant Transparency data to the ENTSO-E. One respondent highlighted that the design of the platform may not account for sending data to the BMRA, noting that a pilot project that does not include any of the GB Interconnectors is already under way. This may require the relevant Interconnector Administrators to scrape the data themselves and submit that on to the BMRA. Another respondent noted that the central platform would not be bound by the BSC, which could present a compliance risk.

A minority of respondents disagree, noting that the obligation to provide the data to the BMRA under the BSC would be on the Interconnector Administrators themselves. One respondent considered that the route via the Interconnector Platform should be recognised as the primary route for Interconnector data to be sent to the ENTSO-E.

Some respondents consider that it should be relatively straightforward for an Interconnector Administrator to submit the same data in two directions (to the ENTSO-E and to the BMRA) simultaneously. However, Workgroup members from Interconnector Administrator organisations highlighted that this would not be the case. They noted that they would need to amend their systems to communicate with two different systems, as the systems and communication methods used by the ENTSO-E would be different to those used by the BMRA.

Several respondents agreed with the Workgroup's view that the industry should not second guess future developments, and should base solutions on the current baseline. Should the situation change in the future, additional Modifications can be raised to accommodate these.

You can find the full responses to the Assessment Consultation in Attachment B.

How reliable is the EMFIP expected to be?

Some Workgroup members had concerns over the reliability of the EMFIP. One Workgroup member noted that the EMFIP timescales were too long to allow it to be a reliable trading information platform. Another member questioned what would happen if the EMFIP was to go down or otherwise be unable to publish the Transparency regulation data.

One member informed the Workgroup that there is currently not enough information on the operation and the interfaces of the EMFIP. They believe that the industry likes familiarity, and would prefer to use a platform that they already know and interact with rather than a platform that they don't. The BMRS has been available to the industry for 12 years, and GB participants are familiar with how it works and how their systems interact with and extract information from it. In contrast, the EMFIP is a new and untested platform. Many members note that they would prefer to keep using the BMRS until the EMFIP has developed a similar track record, at which point they may consider switching. There is also benefit in the flexibility for future changes to be made to how the Transparency regulation data is published on the BMRS, which would be managed under the BSC Change procedures, while it would be much more difficult to make changes to

how the data is published on the EMFIP. Some members also had concerns of how user-friendly the EMFIP would be and how easy it would be to retrieve raw data from the site.

Due to these concerns, Workgroup members believe that publishing the GB Transparency regulation on the BMRS would be beneficial to the industry, as it would provide a backup to viewing and retrieving this data were the EMFIP to be unavailable for any reason.

What timescales should be placed on submitting and publishing the data?

One Workgroup member raised concerns over the difference of timescales between the required Transparency regulation data being published on the EMFIP and the applicable GB data being published on the BMRS. They believe that there is a risk in not making the publication timescales on the BMRS consistent with those on the EMFIP. The member questioned whether there could be an issue with the BMRS publishing the data before the EMFIP, and was concerned that there would be benefit to those who were able to view the BMRS data prior to the required data being published on the EMFIP. They considered that such an approach could undermine the reason for having a central European platform in the first place.

Another member considered that the timescales for publication on the BMRS could be made to be consistent with that of the EMFIP. However, they could not see why there would be an issue with the BMRS publishing this data before the EMFIP, especially as many GB participants, and particularly smaller participants, currently rely on the BMRS for information. It also noted that the BMRS is a public site and that anyone in any country can view the data on the BMRS, and that traders in particular would generally use any and every available source of information, rather than just one particular site. There was also a view that other countries may take a similar approach with their data.

The Workgroup also considered the timescales around submitting the Transparency data to the ENTSO-E. It was noted that Article 18 of the Transparency regulation states that liability is limited to cases of gross negligence or wilful misconduct. Therefore the Transmission Company and the BMRA would not be liable for late data, such as through unavailability of the BMRA systems, as long as all reasonable endeavours have been made to deliver the data to ENTSO-E within the required timescales. The Workgroup agreed that the BSC would place an obligation on the BMRA to forward data to the ENTSO-E as soon as technically possible, with a five minute backstop, in line with existing BMRA timescales, placed in the relevant Code Subsidiary Documents.

Who would be liable for providing the data to the ENTSO-E?

One Workgroup member had concerns about whether or not ELEXON would be acting as an Agent for the Transmission Company under P295. They believed that there would be issues associated with liability if ELEXON was acting as an Agent in this way. The member noted that ELEXON would not be acting as an Agent under P291 as, although industry participants could publish their required urgent market messages (as required by REMIT) via the P291 solution, they would still be required to publish this data themselves if the BMRS and ELEXON Portal went down. It is because of this obligation for participants to still publish this data themselves that means ELEXON is not acting as an Agent for participants under P291.

It was confirmed that, under P295, ELEXON would only be acting as a data provider for the Transmission Company, and not as an Agent, to allow it to forward on the required Transparency data to the ENTSO-E for publication on the EMFIP. The Transmission Company is aware that the obligation to send the required Transparency data falls on itself, and that P295 simply provides a route through which it can submit its data to the ENTSO-E. This means that should the BMRS be unable to forward the required data, for example due to a planned or unplanned outage, the liability would fall on the Transmission Company, who would need to find an alternative way to send the data to the ENTSO-E. It was again noted that Article 18 of the Transparency Regulation states that liability is limited to cases of gross negligence or wilful misconduct.

One member questioned what system contingencies the Transmission Company would have in place to send the required Transparency data if the BMRS was unavailable. It was noted that there are always other ways of getting the data to the ENTSO-E, such as via email. It was therefore confirmed that there will be contingencies in place to address any event whereby the BMRS is unable to forward the data to the ENTSO-E.

What would need to happen if P295 is rejected?

The Issue 47 Group solution 1a proposed that the Transmission Company would submit the required Transparency regulation data directly to ENTSO-E for publication on the EMFIP. At the time, the Group believed that this would result in no BSC impact as no reporting or forwarding of the Transmission Company information was required by ELEXON.

During the P295 Workgroup's consideration of this solution, it was noted that if P295 was rejected, information that is currently published on the BMRS (for example information on Metered Volumes) would need to be sent from ELEXON to the Transmission Company in order for there to be compliance under the Transparency regulation. Therefore, the Issue 47 Group solution 1a would require a BSC change in order to obligate the BMRS, who would be deemed a primary data owner under the Transparency regulation, to submit the required data items⁷ to the Transmission Company, to be forwarded onto the EMFIP for publication.

It should be noted that if P295 is rejected, participants who are deemed primary data owners under the Transparency regulation will still need to submit their required data to the Transmission Company, who would then be responsible for submitting this data on to the ENTSO-E for publication on the EMFIP. Although the Workgroup considered this alternative solution as part of the wider picture, members noted that it would not fix the defect identified by P295⁸, and so could not be put forward as a solution to this Modification. However, this approach would need to be implemented in order to ensure compliance under the Transparency regulation in the event that P295 is rejected. Therefore, the Workgroup deemed it prudent to assess this solution in parallel with the viable P295 solutions. This would be a relatively minor change to the BSC, and by assessing it now, any subsequent Modification raised to implement it could be progressed straight to the Report Phase.

⁷ Further information about these data items can be found in Appendix 1 of this document or in the P295 Industry Impact Assessment documentation, which can be found on the [P295](#) page of the ELEXON website.

⁸ The defect identified by P295 is that there is currently no mechanism in place that would allow ELEXON to assume the role of GB data provider.

The total central implementation cost associated with this solution is £545k. This comprises of:

- Approx. £120k in BMRA effort;
- Approx. £25k in ELEXON effort; and
- Approx. £400k in Transmission Company effort.

During the assessment of this solution, BSC Agents indicated an estimated lead time of 22 weeks, and the Transmission Company has confirmed that it will be able to implement a solution in time for the deadline for delivering the Transparency requirements. The arrangements for delivering the Transparency regulation must be implemented no later than 4 January 2015. Therefore, if P295 was rejected and this solution was progressed as a separate Modification, it would most likely be implemented at the end of December 2014.

What are the Workgroup's views against the Applicable BSC Objectives?

The following table contains the Proposer's and the Workgroup's views against each of the Applicable BSC Objectives:

Does P295 better facilitate the Applicable BSC Objectives?		
Obj.	Proposer's Views	Other Workgroup Members' Views ⁹
(a)	<ul style="list-style-type: none"> • Neutral – No impact. 	<ul style="list-style-type: none"> • Neutral – No impact.
(b)	<ul style="list-style-type: none"> • Yes – The proposed solution would use existing processes and channels between the Transmission Company and ELEXON for the GB implementation of the Transparency regulation. 	<ul style="list-style-type: none"> • Yes (majority) – Agree with Proposer. • Yes – The BMRS is an efficient and reliable platform that the industry trusts and is familiar with. • Yes – More transparency will promote a more efficient market. • Neutral – no impact.
(c)	<ul style="list-style-type: none"> • Yes – The industry will have access to a wider range of data, which in turn will aid competition. 	<ul style="list-style-type: none"> • Yes (unanimous) – Agree with Proposer. • Yes – Striving for further data transparency will improve the conditions of things like price discovery, which will in turn aid competition.
(d)	<ul style="list-style-type: none"> • Neutral – No impact. 	<ul style="list-style-type: none"> • Neutral (majority) – No impact. • No – P295 would incur implementation costs but would have no direct benefit on the efficiency of the BSC arrangements.



What are the Applicable BSC Objectives?

(a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence

(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System

(c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity

(d) Promoting efficiency in the implementation of the balancing and settlement arrangements

(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]

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⁹ Shows the different views expressed by the other Workgroup members – not all members necessarily agree with all of these views.

Does P295 better facilitate the Applicable BSC Objectives?		
Obj.	Proposer's Views	Other Workgroup Members' Views ⁹
(e)	<ul style="list-style-type: none"> • Neutral – No impact. 	<ul style="list-style-type: none"> • Yes (majority) – P295 would enable both the Transmission Company and ELEXON (who owns four of the required data items and is therefore deemed a primary data owner) to comply with the Transparency regulation. • Neutral – No impact.

The Workgroup unanimously believes that P295 does better facilitate the Applicable BSC Objectives, and therefore recommends that P295 is approved.

The Workgroup also unanimously believes that if P295 was rejected, extending the Issue 47 Group solution 1a, as detailed above, would be the best solution to take forward in order to ensure compliance under the Transparency regulation.

Assessment Consultation respondents' views on the Applicable BSC Objectives

The majority of respondents to the Assessment Consultation agreed with the Workgroup's view that P295 would better facilitate Applicable BSC Objectives (b), (c) and (e). The reasons provided by these respondents are broadly consistent with those of the Workgroup. One respondent also noted that P295 would better facilitate Objective (e) in the absence of any other mechanism being put forward to achieve compliance with the Transparency regulation. However, one respondent disagreed, noting that they were unclear as to how P295 would better facilitate Objectives (b) and (c).

One respondent also considered that P295 may better facilitate applicable BSC Objective (a), should the Transmission Company's licence require it to comply with European legislation.

A minority of respondents agreed with the Workgroup's minority view that P295 would have a detrimental impact against Applicable BSC Objective (d), for the reasons put forward by the Workgroup. In particular, respondents note that the Transparency data has nothing to do with balancing or settlement, and so the publication of this data on the BMRS will result in unnecessary duplication and inefficiency as the data would already be available on the EMFIP. However, respondents with these views generally consider that the benefits against the other objectives outweigh this detrimental impact, and so support P295 overall.

You can find the full responses to the Assessment Consultation in Attachment B.

7 Recommendations

The P295 Workgroup invites the Panel to:

- **AGREE** an initial recommendation that P295 **should** be made;
- **AGREE** an initial Implementation Date of:
 - **16 December 2014** if an Authority decision is received on or before 22 January 2014;
- **AGREE** the draft legal text;
- **AGREE** that P295 be submitted to the Report Phase; and
- **NOTE** that ELEXON will issue the P295 draft Modification Report (including the draft BSC legal text) for a 12 Working Day consultation and will present the results to the Panel at its meeting on 12 December 2013

Appendix 1: Data Items Required Under the Transparency Regulation

Transparency regulation data items

The tables below summarise the data items that are required to be submitted to the EMFIP under the Transparency regulation. These data items have been split based on whether they will be submitted by the Transmission Company or BSCCo.

Further information about these data items, including BSC reference and publication timescales, can be found in the P295 Industry Impact Assessment documentation on the [P295](#) page of the ELEXON website.

Transmission Company data items

Table 1: Transmission Company Data Items

Data Item	Reg. Ref.
ACTUAL TOTAL LOAD PER BIDDING ZONE	A6 1a
DAY-AHEAD TOTAL LOAD FORECAST PER BIDDING ZONE	A6 1b
WEEK-AHEAD TOTAL LOAD FORECAST PER BIDDING ZONE	A6 1c
MONTH-AHEAD TOTAL LOAD FORECAST PER BIDDING ZONE	A6 1d
YEAR-AHEAD TOTAL LOAD FORECAST PER BIDDING ZONE	A6 1e
PLANNED UNAVAILABILITY OF CONSUMPTION UNITS	A7 1a
CHANGES IN ACTUAL AVAILABILITY OF CONSUMPTION UNITS	A7 1b
YEAR-AHEAD FORECAST MARGIN	A8 1
EXPANSION AND DISMANTLING PROJECTS	A9 1
PLANNED UNAVAILABILITY IN THE TRANSMISSION GRID	A10 1a
CHANGES IN ACTUAL AVAILABILITY IN THE TRANSMISSION GRID	A10 1b
CHANGES IN ACTUAL AVAILABILITY OF OFF-SHORE GRID INFRASTRUCTURE	A10 1c
REDISPATCHING	A13 1a
COUNTERTRADING	A13 1b
COSTS OF CONGESTION MANAGEMENT	A13 1c
INSTALLED GENERATION CAPACITY AGGREGATED	A14 1a
INSTALLED GENERATION CAPACITY PER UNIT	A14 1b
DAY AHEAD AGGREGATED GENERATION	A14 1c
DAY AHEAD GENERATION FORECASTS FOR WIND AND SOLAR	A14 1d
PLANNED UNAVAILABILITY OF GENERATION UNITS	A15 1a
CHANGES IN ACTUAL AVAILABILITY OF GENERATION UNITS	A15 1b
PLANNED UNAVAILABILITY OF PRODUCTION UNITS	A15 1c
CHANGES IN ACTUAL AVAILABILITY OF PRODUCTION UNITS	A15 1d

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Table 1: Transmission Company Data Items

Data Item	Reg. Ref.
AGGREGATED FILLING RATE OF WATER RESERVOIRS AND HYDRO STORAGE PLANTS*	A16 1d
RULES ON BALANCING	A17 1a
CONTRACTED BALANCING RESERVES	A17 1b
PRICES OF PROCURED BALANCING RESERVES	A17 1c
ACCEPTED AGGREGATED OFFERS	A17 1d
ACTIVATED BALANCING ENERGY	A17 1e
PRICES OF ACTIVATED BALANCING ENERGY	A17 1f
FINANCIAL EXPENSES AND INCOME FOR BALANCING	A17 1i
CROSS-BORDER BALANCING – VOLUMES OF EXCHANGED BIDS AND OFFERS	A17 1j
CROSS-BORDER BALANCING - PRICES	A17 1j
CROSS-BORDER BALANCING ENERGY ACTIVATED	A17 1j

* This data item is not required for GB reporting.

BSCCo data items

Table 2: BSCCo Data Items

Data Item	Reg. Ref.
ACTUAL GENERATION OUTPUT PER GENERATION UNIT	A16 1a
ACTUAL AGGREGATED GENERATION PER TYPE	A16 1b A16 1c
IMBALANCE PRICES	A17 1g
AGGREGATED IMBALANCE VOLUMES	A17 1h

Workgroup's Terms of Reference

Specific areas set by the BSC Panel in the P295 Terms of Reference

What data items will the Transmission Company be required to provide? What data items will the BMRA be required to submit to the EMFIP?

What data items submitted under the Transparency regulation should be published on the BMRS?

Are there any potential alternative solutions?

What are the obligations on the BMRA and the Transmission Company in submitting the required data items? Are there any potential liability issues?

Would non-BSC Parties who are required to provide information under the Transparency regulation be required to submit this via the P295 solution?

What changes are needed to BSC documents, systems and processes to support P295 and what are the related costs and lead times?

Does P295 better facilitate the Applicable BSC Objectives than the current baseline?

Assessment Procedure timetable

P295 Assessment Timetable

Event	Date
Panel submits P295 to Assessment Procedure	11 Jul 13
Workgroup Meeting 1	22 Jul 13
Impact Assessment	08 Aug 13 – 30 Aug 13
Workgroup Meeting 2	03 Sep 13
Assessment Procedure Consultation	20 Sep 13 – 11 Oct 13
Workgroup Meeting 3	23 Oct 13
Panel considers Workgroup's Assessment Report	14 Nov 13

Workgroup membership and attendance

P295 Workgroup Attendance				
Name	Organisation	22 Jul 13	03 Sep 13	23 Oct 13
Members				
David Kemp	ELEXON <i>(Chair)</i>	✓	✓	✓
Talia Addy	ELEXON <i>(Lead Analyst)</i>	✓	✓	✓
Tariq Hakeem	National Grid <i>(Proposer)</i>	✓	✓	✓
Esther Sutton	E.ON	✓	✓	✗
Gary Henderson	IBM	✓	✓	✓
Andy Colley	SSE	✓	✓	✓
Bill Reed	RWE	✓	✗	✓
Phil Hewitt	EnAppSys	✓	✓	☎
Sarah Owen	Centrica	☎	✓	✗
Arthur Moynihan	EirGrid	✗	☎	☎
Ian McClelland	SONI	✗	☎	☎
Vince Hammond	National Grid Interconnectors Ltd	✗	✓	✗
Attendees				
Zaahir Ghanty	ELEXON <i>(Design Authority)</i>	✓	✓	✓
Tina Wirth	ELEXON <i>(Lead Lawyer)</i>	✗	✓	✓
Tim Kerr	ELEXON	✓	✗	✓
Aine Higgins Ni Chinneide	Ofgem	✓	✓	✓
Richard Price	National Grid	✓	✓	✓
Sarah Keegan	EirGrid	☎	☎	✗
Niamh Delaney	EirGrid	☎	✗	✗
Stuart Johnstone	BritNed	✗	✗	✓
Paul McGuckin	MutualEnergy	✗	✗	☎

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