

Stage 03: Assessment Consultation

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

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

The Assessment Consultation for P295 closes:

5pm on Friday 11 October 2013

The Workgroup may not be able to consider late responses.



The P295 Workgroup initially recommends **Approval** of P295

High Impact:



- Balancing Mechanism Reporting Agent (BMRA)
- Transmission Company
- Interconnector Administrators (*potential alternative solution only*)



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

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About this Document

The purpose of this Assessment Consultation is to invite BSC Parties and other interested parties to provide their views on the merits of P295. The P295 Workgroup will then discuss the consultation responses, before making a recommendation to the BSC Panel at its meeting on 14 November 2013 on whether or not to approve P295.

There are four 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 the P295 proposed solution.
- Attachment B contains the draft redlined changes to the BSC for the P295 potential alternative solution.
- Attachment C contains the specific questions on which the Workgroup seeks your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish the Workgroup to consider.

Further Information

More information is available in

Attachment **A**: Draft Legal Text for Proposed Solution

Attachment **B**: Draft Legal Text for Potential Alternative Solution

Attachment **C**: Assessment Consultation Response Form

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



Any questions?

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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.

Solutions

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 Balancing Mechanism Reporting Agent (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.

The Workgroup is considering an extension of the P295 proposed solution as a potential alternative solution. This solution proposes that Interconnector Administrators would submit all Interconnector data that is deemed Transparency data to the BMRA, in parallel with submitting the data to the ENTSO-E. This data would then be published on the BMRS alongside the Transmission Company data. Interconnector Administrators may choose to submit this data individually or via an agreed third party.

Impacts & Costs

P295 impacts the BSC and the BMRA Service Description and User Requirement Specification. P295 will impact the BMRA, the Transmission Company and ELEXON. Interconnector Administrators will be impacted by the potential alternative solution only.

The central implementation cost of the proposed solution is approximately £625k, comprising £500k in BMRA costs, £25k in ELEXON effort and £100k in Transmission Company costs.

The central implementation cost of the potential alternative solution is approximately £770k, comprising £645k in BMRA costs, £25k in ELEXON effort and £100k in Transmission Company costs.

Implementation

P295 is proposed for implementation on 31 December 2014, if the Authority's decision is received on or before 22 January 2014.

Workgroup's Recommendations

The Workgroup initially unanimously believes that P295 would better facilitate Applicable BSC Objectives (b) and (c), and therefore initially 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 the various GB industry requirements, the data that will be required under the regulation on wholesale energy markets integrity and transparency (REMIT) (Regulation (EU) No 1227/2011)² and the European Network Codes that 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 has developed the draft 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 all of this 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 proposes 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 and is currently considering putting forward a combination of Solutions 3 and 4 as a potential alternative solution to P295.

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 should 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 does not expect P295 to amend the 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 and Interconnector TSOs are 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.

3 Proposed Solution

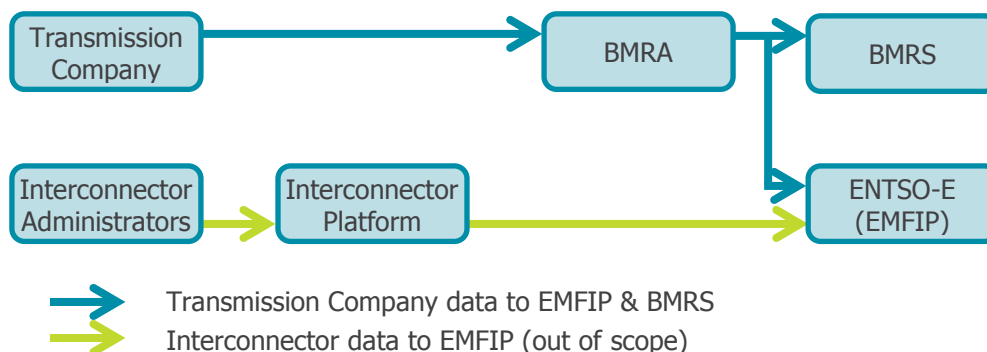
Proposer's proposed solution

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 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.

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, as some of the data added may already be published elsewhere on the BMRS. 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 would be facilitated by a separate Modification Proposal instead.



Legal text for the proposed solution

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

Assessment Consultation Question

Do you believe that the draft legal text in Attachment A delivers the intention of the P295 proposed solution?

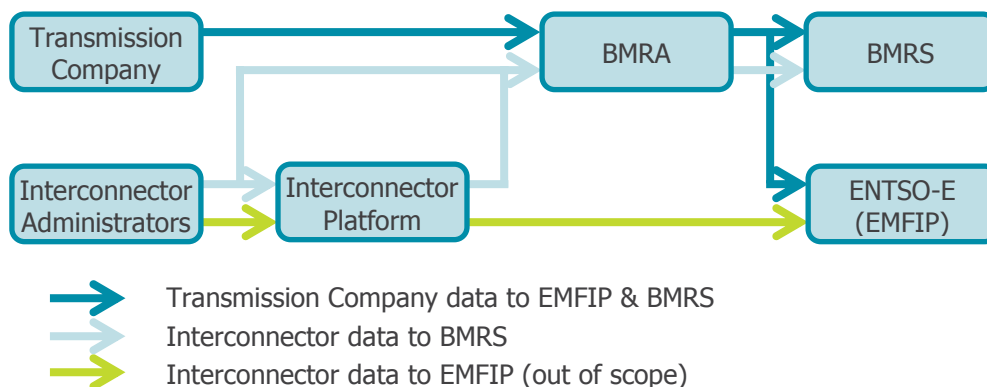
Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment C

Workgroup's potential alternative solution

The Workgroup is currently considering a potential alternative solution which proposes an extension to the proposed solution. Under the potential alternative 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. It should be noted that the BMRA would not be responsible for submitting Transparency data received from Interconnector Administrators to the ENTSO-E; this would be done by the Interconnector Administrators themselves. Interconnector Administrators would also be allowed to submit the data to the BMRA via an agreed third party, such as an Interconnector Platform, rather than submitting the information direct.

Some Workgroup members believe 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. It believes 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, and so it is considering putting it forward as a potential alternative solution, pending the results of further assessment on the costs and lead times (see Section 4).



Assessment Consultation Question

Do you believe that the Workgroup's potential alternative solution would be better than the proposed solution and should be raised as an Alternative Modification to P295?

Please provide your rationale with reference to the Applicable BSC Objectives.

The Workgroup invites you to give your views using the response form in Attachment C

Legal text for the potential alternative solution

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

Assessment Consultation Question

Do you believe that the draft legal text in Attachment B delivers the intention of the P295 potential alternative solution?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment C

Other potential alternative solutions considered by the Workgroup

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 the Interconnector Transparency data. 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 the 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 is considering raising this as a potential alternative solution to P295, as noted above, pending further assessment of the costs and lead times for this solution (see Section 4).

Further information on the Workgroup's wider discussions on the solutions can be found in Section 6. The Workgroup does not believe there are any further potential solutions to P295.

Assessment Consultation Question

Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P295 which would better facilitate the Applicable BSC Objectives?

Please provide your rationale and, if 'No', please provide full details of your Alternative Modification(s) and your rationale as to why it/they better facilitate the Applicable BSC Objectives.

The Workgroup invites you to give your views using the response form in Attachment C

Estimated central implementation costs of P295

Proposed solution

The total central implementation costs for the proposed solution is approximately £625k. This comprises of:

- Approx. £500k 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 onto the BMRA.

Please note that the BMRA costs for both the proposed and the potential alternative solutions are indicative one off-costs. Further information is required from the Transmission Company on the content, structure and frequency of the flows that it will send to the BMRA under P295 before firm costs can be provided. This information is being sought from the Transmission Company, and it is expected that the firm costs will be available for the Workgroup's Assessment Report. In the interim, logical assumptions have been made for this missing information in order to provide these indicative costs. The same is true for the lead times for P295 (see Section 5).

Potential alternative solution

The total central implementation costs for the alternative solution is approximately £770k. This comprises of:

- Approx. £645k 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 onto the ENTSO-E and published on the BMRS. These costs are also to enable the receipt of Transparency regulation data from Interconnector Administrators and publication of this data on the BMRS.

The alternative solution will also require the Transmission Company to update its systems to forward the required data onto the BMRA.

Indicative industry costs for P295



Industry Impact Assessment

The full responses made by Parties to the Industry Impact Assessment can be found on the [P295](#) page of the ELEXON website.

The biggest impact is expected to be on Interconnector Administrators, who would be required under the potential alternative solution to forward their Transparency data to the BMRA in parallel with sending it to the ENTSO-E. In particular, Interconnector Administrators have noted that they would need to implement the necessary system and process changes to send their data to the BMRA. However, none of the Interconnector Administrators who responded to the Industry Impact Assessment were able to provide any information on the expected costs at this time. The Workgroup is seeking further detail on the expected impacts and costs of the potential alternative solution from these organisations.

The impacts on other participants would be minimal, with respondents noting the only impacts on them, if any, would be possible system changes to account for any changes made to the TIBCO flows to accommodate the Transparency data. Respondents have noted costs for this ranging from minimal up to around £100k.

P295 impacts

Impact on BSC Systems and process

BSC System/Process	Impact
BMRA/BMRS	<p>Under the proposed and potential alternative solution, 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.</p> <p>The alternative solution will also require the BMRA to publish Interconnector data on the BMRS.</p>

Impact on BSC Parties and Party Agents

The potential alternative solution will require Interconnector Administrators to also provide Transparency data to the BMRA.

Minimal or no impact is anticipated on BSC Parties and Party Agents under both solutions, 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 the solutions. The proposed changes for the proposed and potential alternative solutions can be found in Attachments A and B respectively.
Section V	
Section X Annex X-1	

Impact on Code Subsidiary Documents	
CSD	Impact
BMRA Service Description	Changes will be required to implement the solutions. 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 initially recommends an Implementation Date for both the P295 proposed and potential alternative solutions of:

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

The lead time is driven by the lead 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. This would also allow P295 to be implemented in parallel with P291.

Two-phased implementation approach

The P295 Workgroup is considering the potential for a two-phased implementation approach for the proposed and alternative solutions. This is due to the large lead times indicated by BSC Agents to make the necessary system changes, which may be 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 left for the second phase.

- The **first phase** would see the implementation of required system and document changes to enable the BMRA to act as GB data provider for all the data that the Transmission Company is required to submit under the Transparency regulation. These changes will enable the BMRA to receive the required data and forward it on to ENTSO-E for publication. The first phase would be implemented on 31 December 2014.
- The **second phase** would see the implementation of required system and document changes to enable the publication of the Transparency regulation data received from the Transmission Company on the BMRS. For the potential alternative solution, all aspects relating to the receipt and publication of Interconnector Administrator data would also be done under this second phase. The second phase would most likely be implemented in the second half of 2015, but this would be confirmed following re-assessment.

It should be noted that such an approach would likely incur higher central costs as several areas of implementation, such as testing, would need to be carried out twice. The Workgroup therefore considers that such an approach would only be taken if the lead times following re-assessment would not allow for the entire P295 solution to be implemented in time. The implementation approach will be confirmed following the re-assessment of P295 by the BMRA, as noted in Section 4.

Assessment Consultation Question

Do you agree with the Workgroup's recommended Implementation Date?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment C

Publication of Transparency regulation data 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.

One Workgroup member 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. Another member commented that it would be useful for the industry to have sight of this information, but 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.

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.

Another member, who was also not in favour of the alternative solution, 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.

A concern was highlighted that the implementation of P295 could interfere with 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 how Interconnector Administrators comply with the regulation. It only seeks to obtain Interconnector Transparency regulation data for publication on the BMRS. The intent of the solution is 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 is expected that the format of the files submitted by Interconnector Administrators will 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 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.

Assessment Consultation Question

Do you think the introduction of a central European auction management platform could interfere with an Interconnector Administrators ability to comply with the BSC obligations that would be introduced under the P295 potential alternative solution?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment C

One Workgroup member, who is in favour of the alternative solution, stated 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 the best picture of what is happening in the industry when they trade, and so the more information that is available the better. The publication of 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.

The Workgroup discussed the possibility of scraping Interconnector Transparency regulation data from the EMFIP, given the potential impacts on Interconnector Administrators to provide such data. 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 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.

Timescales

One Workgroup member raised concerns over the differentiation 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 was also noted that the BMRS is a public site and that anyone in any country can view the data on the BMRS, and there was 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.

Reliability of the EMFIP

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 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 BMRA, who would be deemed a primary data owner under the Transparency regulation, to submit the required data items⁶ 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 P295⁷, 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. The total central implementation cost associated with this solution is £545k. This comprises of approximately £120k in BMRA effort, £25k in ELEXON Effort and £400k in Transmission Company effort.

During the assessment of this solution, BSC Agents indicated an estimated lead time of 22 weeks. 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.

⁶ 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.

⁷ 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.

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 ⁸
(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 (unanimous) – 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.
(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.
(e)	<ul style="list-style-type: none"> • Neutral – No impact. 	<ul style="list-style-type: none"> • Neutral – No impact.

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

Assessment Consultation Question

Do you agree with the Workgroup's initial unanimous view that P295 does better facilitate the Applicable BSC Objectives than the current baseline?

Please provide your rationale with reference to the Applicable BSC Objectives.

The Workgroup invites you to give your views using the response form in Attachment C



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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⁸ Shows the different views expressed by the other Workgroup members – not all members necessarily agree with all of these views.

Workgroups initial views on the proposed solutions

Based on the information available at this point in time, a **slight majority** of the Workgroup expressed a preference for the proposed solution over the potential alternative solution. However, members note that their view is provisional pending the re-assessment of the costs and lead times of the solutions as noted in Section 4, which will also determine whether they wish to raise the potential alternative solution as an Alternative Modification.

The Workgroup **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.

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, BSCCo or Interconnector Administrators.

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
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
AGGREGATED FILLING RATE OF WATER RESERVOIRS AND HYDRO STORAGE PLANTS*	A16 1d

Table 1: Transmission Company Data Items

Data Item	Reg. Ref.
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, 1c
IMBALANCE PRICES	A17 1g
AGGREGATED IMBALANCE VOLUMES	A17 1h

Interconnector data items

Table 3: Interconnector Administrator Data Items

Data Item	Reg. Ref.
PLANNED UNAVAILABILITY IN THE TRANSMISSION GRID	A10 1a
CHANGES IN ACTUAL AVAILABILITY IN THE TRANSMISSION GRID	A10 1b
OFFERED DAY-AHEAD TRANSFER CAPACITY	A11 1a
OFFERED DAY-AHEAD CAPACITY IN IMPLICIT TRANSMISSION AUCTIONS	A11 1b
OFFERED DAY-AHEAD TRANSFER CAPACITY	A11 2
FORECASTED AND OFFERED WEEK-AHEAD TRANSFER CAPACITIES	A11 2
FORECASTED AND OFFERED MONTH-AHEAD TRANSFER CAPACITIES	A11 2
FORECASTED AND OFFERED YEAR-AHEAD TRANSFER CAPACITIES	A11 2
Offered INTRADAY TRANSFER CAPACITY	A11 2
CROSS-BORDER CAPACITY FOR DC LINKS – RAMPING RESTRICTIONS	A11 3

Table 3: Interconnector Administrator Data Items

Data Item	Reg. Ref.
CROSS-BORDER CAPACITY FOR DC LINKS – INTRADAY TRANSFER LIMITS	A11 3
CRITICAL NETWORK ELEMENTS	A11 4
EXPLICIT AUCTIONS – USE OF THE TRANSMISSION CAPACITY	A12 1a
EXPLICIT AUCTIONS – AUCTION REVENUE	A12 1a
TOTAL CAPACITY NOMINATED	A12 1b
TOTAL CAPACITY ALREADY ALLOCATED	A12 1c
DAY-AHEAD PRICES	A12 1d
IMPLICIT AUCTIONS – NET POSITIONS	A12 1e
IMPLICIT AUCTIONS – CONGESTION INCOME	A12 1e
SCHEDULED DAY-AHEAD COMMERCIAL EXCHANGES	A12 1f
PHYSICAL FLOWS	A12 1g
TRANSFER CAPACITIES ALLOCATED WITH THIRD COUNTRIES	A12 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
Present Assessment Report to Panel	14 Nov 13

Workgroup membership and attendance

P295 Workgroup Attendance			
Name	Organisation	22 Jul 13	03 Sep 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	☎	✓
Claire Taylor	Eggborough	✗	✗
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	☎	✗