

Stage 03: Transmission Company Analysis

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

Response Form

The P295 Modification Workgroup requests your impact assessment of P295. In particular, we ask for your responses to the following questions and your reasons for those responses.

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase



Transmission Company Analysis Questions

Question 1

Please describe the impact(s) of P295 on your ability as a Transmission Company to discharge your obligations efficiently under the Transmission Licence and to operate an efficient, economical and co-ordinated transmission system. Where applicable, please state any difference in impacts between the Workgroup's proposed solutions.

P295 would not impact on the ability of the Transmission Company to discharge the obligations under the Transmission Licence to operate an efficient and co-ordinated transmission system.

Question 2

Please outline the impact of P295 on the computer systems and processes of the Transmission Company. Include details of any changes needed as a result of implementing P295 and the lead times required for those changes. Where applicable, please state any difference in impacts between the Workgroup's proposed solutions.

Proposed Solution – This would require National Grid to submit data required to deliver the Transparency Regulation to Elexon for onward transmission to EMFIP. The information would be generated by up to 4 separate National Grid IT Systems and, in the main, would consist of data currently not reported. The data submitted under the proposed solution would be incremental to the data that National Grid submit to Elexon through existing National Grid / Elexon interfaces and would utilise, as much as possible, existing processes and architecture. National Grid is also required to submit REMIT data to Elexon under P291, this data is a subset of data required under Transparency and, under the Proposed Solution, would be included in the Transparency data flows.

Solution A – The National Grid impact under this solution is the same as for the

Your response

We invite you to respond to the questions in this form.



How to return your response

Please send responses, entitled "P295 Transmission Company Analysis" to modifications@elexon.co.uk by 5pm on Friday 30 August 2013.

P295
Transmission Company
Analysis

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Question 2

proposed solution.

Solution B – This would require National Grid to set-up and maintain a new data channel to EMFIP (in addition to the existing National Grid – Elexon interface), as well as introducing new internal processes. The new data channel would be used to submit data direct to EMFIP. National Grid would also be required to make IT changes to receive additional Transparency data from Elexon (where Elexon is the party with ownership of Transparency data), which would be included in the data stream submitted to EMFIP. National Grid is also required to submit REMIT data to Elexon under P291, this data is a subset of data required under Transparency and, under Solution B, this data would still need to be submitted to Elexon whilst the Transparency data would be submitted via the EMFIP data link and so this option would involve some duplication in comparison to the proposed solution.

Question 3

Please provide details of any consequential changes to Core Industry Documents and/or the System Operator Transmission Owner Code that would be needed as a result of implementing P295. Where applicable, please state any differences in impacts between the Workgroup's proposed solutions.

There will not be any consequential changes required to core industry documents specifically as a result of P295. Changes may be required to the Grid Code but these would be required irrespectively of P295.

Question 4

Please provide an estimate of development, capital and operating costs in appropriate detail which you as a Transmission Company anticipate that you would incur in implementing P295. Where applicable, please state any differences in costs between the Workgroup's proposed solutions.

At a high level, Solution B may require the set-up and maintenance of a new data channel to EMFIP. New network infrastructure would be required whilst the Proposed Solution would utilise existing infrastructure. The Solution B option would have an increased differential cost of up to £300k in comparison to the proposed solution.

Question 5

Please outline any potential issues relating to security of supply arising from P295.

There are no security of supply issues from P295

Question 6

Please outline your views and rationale on whether P295 would help to achieve the Applicable BSC Objectives.

We believe the Proposed Solution and Solution A better meets Applicable BSC Objectives (b) and (c).

Objective (b) - The efficient, economic and co-ordinated operation of the National

Question 6

Transmission System – is better met by utilising existing data channel and data flow arrangements between National Grid and Elexon rather than creating new channels.

Objective (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 – is better met by the publication of Transparency data on the BMRS

Question 7

Please provide any other comments you may have on P295.

No further comments.

Further Information

To help us process your response, please:

- Email your completed response form to modifications@elexon.co.uk
- Use the following text in the subject line of your email: "P295 Transmission Company Analysis"
- Include a phone number in your covering email, so that we can contact you if we have any questions
- Respond by **5pm** on **Friday 30 August 2013** (the Workgroup may not be able to consider a late response)

The Workgroup will consider your response at its next meeting.