

## CP1503 'Changes to European Transparency Regulation data to align with latest ENTSO-e Manual of Procedures'

**ELEXON**



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### About This Document

This document is the Change Proposal (CP) 1503 Final Report which ELEXON has published following the decision from the Balancing and Settlement Code (BSC) Panel to approve CP1503.

ELEXON presented this CP to the Panel at its meeting on 12 April 2018 instead of to the Imbalance Settlement Group (ISG) (the Committee responsible for the impacted documents), in accordance with the ISG [Terms of Reference](#), due to implementation costs exceeding £150k.

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 ISG's views on the proposed changes and the views of respondents to the CP Consultation, along with the final decision on whether to approve this change.
- Attachments A-B contain the approved redlined changes to deliver the CP1503 solution.
- Attachment C contains the full responses received to the CP Consultation.

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# 1 Why Change?

## Background

### Transparency Regulation

The Transparency Regulation ([Regulation \(EU\) No 543/2013](#)) is a legally binding regulation that came into force on 4 July 2013. The regulation outlines the rules and obligations on the submission and publication of data in electricity markets across the European Union (EU).

Under this regulation, primary data owners are required to submit European Transparency Regulation (ETR) Data to their Transmission System Operator (TSO), or their delegated representatives, for publication on a central information platform known as the Electricity Market Fundamental Information Platform (EMFIP).

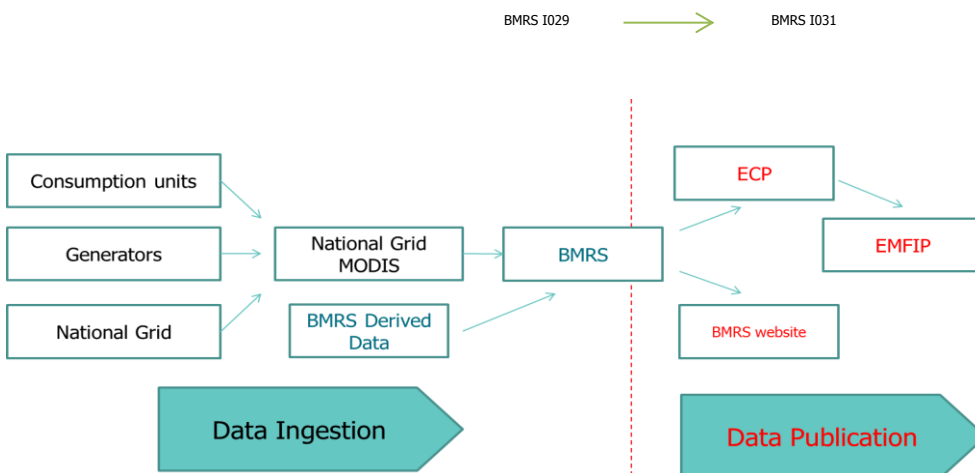
In accordance with Regulation 543/2013, EMFIP was launched on 5 January 2015. The platform is operated by the European Network of Transmission System Operators for Electricity (ENTSO-e).

ENTSO-e also published the [Manual of Procedures v2.0 \(MoP\)](#), which provides detailed information necessary to submit the data to EMFIP.

### Approved BSC Modification P295

BSC Modification [P295 'Submission and publication of Transparency regulation data via the BMRS'](#) was approved by the Authority on 22 January 2014 and implemented on 16 December 2014.

The Modification specified ELEXON as the Data Provider in Great Britain (GB), for all the information that the Transmission Company (National Grid) is required to submit to the EMFIP under the ETR. As such, National Grid submits the majority of the required ETR data to the Balancing Mechanism Reporting Service (BMRS). The BMRS then calculates the remaining ETR data and submits the data to the ENTSO-e for publication on the EMFIP, and also publishes it on the BMRS website, as shown below.



## ETR Data

The ETR data is submitted in accordance with the ETR and aligned to the Manual of Procedures (MoP). However, the MoP is not referenced within the BSC.

The ETR data items are specified in Table 1B of [BSC Section V 'Reporting'](#) and in Appendix C, Paragraph 7, of the [Balancing Mechanism Reporting Agent \(BMRA\) User Requirement Specification \(URS\)](#).

The [NETA Interface Definition & Design \(IDD\) Part 2](#) references the flows (BMRA-I029) and the format of the data of the Extensible Markup Language (XML) to be consistent with the [ENTSO-e's XML Schema Definition \(XSD\)](#). BMRA-1029 is the ETR data exchange between National Grid and the BMRS. The [IDD Part 1](#) specifies the flows (BMRA-I031), which is the interface between the BMRS and ENTSO-e that is published.

## What is the issue?

ENTSO-e has announced changes to the MoP in v2.1 that impacts the ETR data sent from National Grid, or derived from the BMRS.

<sup>1</sup>The ETR Articles impacted by the MoP changes are as follows:

- 14.1 (b) "Installed Generation Capacity Per Unit" - Publication of commissioning and decommissioning dates
- 14.1 (d) "Day-Ahead Generation Forecasts For Wind And Solar" - Additional forecasts intraday and "current/most recent"
- 17.1 (d) "Accepted Aggregated Offers" – Offered capacity removed
- 17.1 (e) "Activated Balancing Energy" - Unit of measurement MWh only
- 17.1 (f) "Prices of activated energy" - Prices maybe positive or negative
- 17.1 (h) "Aggregated Imbalance Volumes" - Surplus/deficit indicated explicitly and use additional tags to indicate surplus or deficit

A full summary of the ETR Articles impacted by the MoP changes can be found in Appendix 2.

Changes to the MoP require changes to the BMRS website in order to receive and publish the ETR data, before forwarding it to EMFIP.

Those impacted by the regulation, i.e. National Grid and BMRS, must comply to the above changes by December 2018. This will require changes to the BMRS to receive and publish this data before forwarding it to the EMFIP platform.

## Changes to BSC Configurable Item

The IDD Part 2 refers to the ETR data as BMRA-I029, which states 'These files will be received in XML and PDF formats defined by ENTSO-e'; it doesn't reference the MoP. The XSD defines the format values for the flows, and further outlines the business rules to deliver the flows which are defined in the MoP. The overall rules are defined in the MoP

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<sup>1</sup> These listed articles are within the scope of the BMRS.

that specifies the related XSD; however the rules on implementing the flows are defined in the MoP and its reference documents, which are not currently recognised in the IDD.

Currently the BMRA-I031 in IDD Part 1 does not refer to either the XSDs or the MoP. Therefore the IDD Part 1 also needs to be amended to recognise that ETR data published from BMRS to conform with ENTSO-e's XSD and MoP.

Furthermore this CP provides opportunities to improve reporting of ETR reports on BMRS for the benefit of GB users.

### Approved solution

[CP1503 'Changes to European Transparency Regulation data to align with latest ENTSO-e Manual of Procedures'](#) will amend the BMRS to accommodate necessary ETR data changes to align the BSC with the MoP v2.1, as well as improving existing ETR reporting.

### System Changes to BMRS Application

ELEXON must implement changes to the BMRS to ensure ongoing compliance with the ETR changes as set out in v.2.1 of the MoP. This includes:

- the receipt, processing and publishing the amended ETR data originating from National Grid; and
- calculating and publishing amended ETR data (for BMRS derived ETR data).

ELEXON will make changes to ensure the BMRS continues to forward all ETR data to the EMFIP. The data will be published via the existing publishing mechanism on the BMRS website, TIBCO, Application Programming Interfaces (APIs) and Data Push Service.

### BSC Governance

The MoP will be referenced in the BMRA-I031 data flow in the NETA IDD Part 1 and in the BMRA-I029 data flow in the NETA IDD Part 2 as part of this CP. The specific changes that are giving rise to BMRA-I029 and BMRA-I031 are to be specified in the lower level reference in ENTSO-e's subsidiary documentation rather than the MoP itself.

This will ensure the changes are controlled under BSC Governance and that BSC Parties have visibility of the changes to BMRS. By making reference to the MoP in the IDD this will ensure that futures changes to the MoP are given visibility through the CP process. ELEXON must comply with BSC and ETR, maintaining full compliance.

### Improvements to ETR reports

In addition to the changes to align the BSC with the MoP changes, this CP will improve the following ETR reports on BMRS for the benefit of GB users:

- ETR outage reports on BMRS - ENTSO-e has now enabled curve type functionality for reporting outage data.
- Enabling A03 Curve types for Article 17.1 (b) and Article 17.1 (c) and allowing processing of additional business types for the time series for Article 13.1 (c).

National Grid has requested to be able to start sending Article 17.1 b and 17.1 c in the A03 Curve Type which will require a change to BMRS to present the data correctly.

## **Proposer's rationale**

The latest changes to the MoP require National Grid to amend some of the data flows it sends to the BMRS. To fulfil the obligation under the ETR, i.e. to report data to EMFIP, the BMRS must conform to the latest effective MoP. As National Grid is the GB TSO, it is responsible for ensuring the changes are implemented by the December 2018 deadline.

## **Approved redlining**

Attachments A and B contain the approved redlining to deliver CP1503.

## 3 Impacts and Costs

### Central impacts and costs

#### Central impacts

CP1503 will require ELEXON, via its service provider, to upgrade software to update the BMRS systems.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none"><li>• NETA IDD Part 1</li><li>• NETA IDD Part 2</li></ul>	<ul style="list-style-type: none"><li>• BMRS</li></ul>

#### Central costs

The central implementation costs for CP1503 have been estimated at approximately £230k.

ELEXON's service provider requires a 25-week lead time to implement these changes.

### BSC Party & Party Agent impacts and costs

We do not expect CP1503 to impact any BSC Parties or Party Agents. This has been confirmed through the responses received to the CP Consultation.

## 4 Implementation Approach

### Implementation Date

CP1503 will be implemented on **1 November 2018** as part of the November 2018 BSC Release.

This is the earliest appropriate Release in order to fulfil the obligation under the ETR. ENTSO-e has allowed those affected by the change in MoP until **December 2018** to make the appropriate changes.

Both respondents to the CP Consultation agreed with the proposed implementation approach for CP1503. One respondent highlighted [EU Directive 2015/1535](#), to ensure that it is taken into account as part of CP1503.



### ISG's initial views

CP1503 was presented to the ISG for information at its meeting on 20 February 2018 ([ISG202/07](#)).

An ISG Member queried whether there were any impacts on users, other than National Grid and ELEXON. ELEXON confirmed that Market Participants, e.g. generators (who submit ETR data) are not required to make any changes to their systems. EMFIP has now enabled processing of profiles for outages and generators can now submit outage profiles but no changes are required as a result of CP1503.

ELEXON highlighted that Market Participants consuming the data from BMRS will need to be aware of the changes to the data reported. ELEXON will be issuing specific communications on the changes, such as profiles for ETR outages and additional outage validations independently of this CP, via ELEXON's standard communication channels i.e. Newscast.

The ISG member sought further clarification on whether the changes were therefore focused specifically on the interfaces between National Grid and ELEXON. ELEXON confirmed that CP1503 was a change to ELEXON's multiple interfaces, as outlined in the [CP1503](#) Progression Paper.

The same ISG member noted that the National Grid reporting components of the change were targeting an earlier release date of April 2018, or soon thereafter. ELEXON confirmed National Grid had requested an earlier Implementation Date for this part of the change, but it is not possible to deliver this in the requested timescales. ELEXON is still investigating whether it is possible to deliver the 'A03 Curve type' change significantly earlier than the November 2018 Release (1 November 2018).

The ISG member, who had queried the impacts of the CP on users, suggested that this be drawn out in the CP Consultation (questions can be found in attachment C of this document while impacts and costs can be found on page 7 of this document).

The ISG did not provide any further comments or additional questions to include in the consultation.

## 6 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment C.

Summary of CP1503 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1503 proposed solution?	2	0	0	0
Do you agree that the draft redlining delivers the intent of CP1503?	2	0	0	0
Will CP1503 impact your organisation?	0	2	0	0
Will your organisation incur any costs in implementing CP1503?	0	2	0	0
Do you agree with the proposed implementation approach for CP1503?	2	0	0	0
Do you have any further comments on CP1503?	0	2	0	0

### Comments on the CP

Both respondents to the CP Consultation agreed with the proposed solution. One respondent commented that their support was on the basis that the implementation is undertaken in accordance with the transparency rules of the EU as set out in [Directive 2015/1535](#).

One element of CP1503 is required to provide GB compliance with the latest ENTSO-e MoP; a second element - the 'A03 Curve Type' - is to allow Generators to submit Transparency Data in a more efficient format; and the third element consists of improvements to the BMRS Transparency Data pages which can be delivered more economically with other changes.

### Comments on the proposed redlining

No comments were received on the draft redlined text for CP1503.

### The Panel's final views

CP1503 was presented to the Panel for decision at its meeting on 12 April 2018 ([Panel 277/04](#)).

The Panel made no comments and unanimously approved CP1503.

### Final decision

The Panel has:

- **APPROVED** CP1503 for implementation on 1 November 2018 as part of the November 2018 BSC Systems Release.

## Appendix 1: Glossary & References

### Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
BMRA	Balancing Mechanism Reporting Agent
BMRS	Balancing Mechanism Reporting Service
BSC	Balancing and Settlement Code
CP	Change Proposal
CPC	Change Proposal Circular
EMFIP	Electricity Market Fundamental Information Platform
ENTSO-e	European Network of Transmission System Operators
ETR	European Transparency Regulation
EU	European Union
GB	Great Britain
IDD	Interface Definition and Design
ISG	Imbalance Settlement Group
MoP	Manual of Procedures
NETA	New Electricity Trading Arrangements
TSO	Transmission System Operator
URS	User Requirement Specification
XML	Extensible Markup Language
XSD	XML Schema Definition

### External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
1	ISG Terms of Reference	<a href="https://www.elexon.co.uk/group/imbalance-settlement-group-isg/">https://www.elexon.co.uk/group/imbalance-settlement-group-isg/</a>
2	The European Transparency Regulation No 543/2013 webpage	<a href="http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF">http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF</a>
2	P295 page of ELEXON's website	<a href="https://www.elexon.co.uk/mod-proposal/p295/">https://www.elexon.co.uk/mod-proposal/p295/</a>

External Links		
Page(s)	Description	URL
2	ENTSO-e's Manual of Procedures	<a href="https://www.entsoe.eu/data/entso-e-transparency-platform/Manual-of-Procedures/Pages/default.aspx">https://www.entsoe.eu/data/entso-e-transparency-platform/Manual-of-Procedures/Pages/default.aspx</a>
3	BSC Section V 'Reporting' page of ELEXON's website	<a href="https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/">https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/</a>
3	BMRA section of ELEXON webpage	<a href="https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/user-requirement-specifications/">https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/user-requirement-specifications/</a>
3	The NETA Interface Definition & Design Part 2 page of the ELEXON's website	<a href="https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/interface-definition-documents/">https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/interface-definition-documents/</a>
3	The ENTSO-e's XML Schema Definition (XSD) page of ENTSO-e's website	<a href="https://www.entsoe.eu/data/entso-e-transparency-platform/Data-Providers/Pages/default.aspx">https://www.entsoe.eu/data/entso-e-transparency-platform/Data-Providers/Pages/default.aspx</a>
3	The NETA Interface Definition & Design Part 1 page of the ELEXON's website	<a href="https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/interface-definition-documents/">https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/interface-definition-documents/</a>
8	EU Directive 2015/1535	<a href="https://www.gov.uk/government/publications/technical-standards-and-regulations-directive-9834ec-guidance-for-officials">https://www.gov.uk/government/publications/technical-standards-and-regulations-directive-9834ec-guidance-for-officials</a>
9	ELEXON webpage for ISG202 meeting	<a href="https://www.elexon.co.uk/group/imbalance-settlement-group-isg/">https://www.elexon.co.uk/group/imbalance-settlement-group-isg/</a>
10	Directive 2015/1535.	<a href="https://www.gov.uk/government/publications/technical-standards-and-regulations-directive-9834ec-guidance-for-officials">https://www.gov.uk/government/publications/technical-standards-and-regulations-directive-9834ec-guidance-for-officials</a>
11	ELEXON webpage for the Panel 277 meeting	<a href="https://www.elexon.co.uk/meeting/bsc-panel-meeting-277/">https://www.elexon.co.uk/meeting/bsc-panel-meeting-277/</a>

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## Appendix 2: Summary of changes to ETR data

ETR Article	Data summary	Revision	Primary Data Owner	Impact	Notes
12.1(b) &(f)	Information relating to the use of cross zonal capacities	Separate publications per time horizon, no aggregation on TP	Interconnector	No impact	BMRS does not receive or publish interconnector ETR data
13.1(a)	Information relating to congestion management measures	Publication of energy instead of capacity, distinction internal/cross-border re-dispatching, network element optional	Interconnector	No Impact	As above
14.1(b)	Installed Generation Capacity Per Unit	Publication of commissioning and decommissioning dates	National Grid	Impact to ELEXON and National Grid	Report is derived from the Master configuration data and the BMRS website GUI needs to be modified to include decommissioning date when confirmed
14.1(d)	Forecast Generation - Day-Ahead Generation Forecasts For Wind And Solar	Additional forecasts intraday and "current/most recent"	National Grid	Impact to ELEXON and National Grid	National Grid will need to amend their system to send additional data and changes are required to BMRS GUI (APIs) to include a most recent forecast. Defined as process type, therefore an attribute in the header of the XML. Separate XML need to be submitted for intraday and current. Frequency of submissions for current forecast has not been defined
17.1 (d)	Accepted Aggregated Offers	Offered capacity removed	ELEXON (BMRS)	Low impact	The offered capacity is currently displayed on the BMRS website and has been blank. No changes will result in an empty column (as-is)
17.1 (e)	Activated Balancing Energy	Unit of measurement MWh only	National Grid	Low impact	National Grid will need to convert the value submitted to BMRS to MWh. The column headers on BMRS website needs to be amended to from MWh

ETR Article	Data summary	Revision	Primary Data Owner	Impact	Notes
12.1(b) &(f)	Information relating to the use of cross zonal capacities	Separate publications per time horizon, no aggregation on TP	Interconnector	No impact	BMRS does not receive or publish interconnector ETR data
13.1(a)	Information relating to congestion management measures	Publication of energy instead of capacity, distinction internal/cross-border re-dispatching, network element optional	Interconnector	No Impact	As above
17.1 (f)	Prices of activated energy	Prices may be positive or negative	National Grid	Low Impact	XSD validation on BMRS does not currently restrict signed values and this has little or no impact.
17.1 (h)	Aggregated Imbalance Volumes	Surplus/deficit indicated explicitly and use additional tags to indicate surplus or deficit	ELEXON (BMRS)	Impact on ELEXON	ELEXON currently generates the data and will require changes to the data and the website presentation
<b>Enabling Curve Type functionality on EMFIP</b>					
7.1 (a) &(b) & 15.1 (a), (b), (c) & (d)	Outage Data 7.1 (a) & 7.1 (b)– consumption unit 15.1 (a) & (b) – Generation units 15.1 (c) & (d) – Production units	Validation against overlapping outages & curves types now permitted	Generators Consumption units	No impact	Data owners are now able to submit outage curve (profiles). There is an opportunity to align BMRS website presentation with ENTSO-e to make the screen more useable. The overlapping validation can be configured by ELEXON to either issue a warning or reject overlapping outages.