

## Responses from P220 Assessment Report Consultation

Consultation Issued on 7 January 2008

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	Centrica	P220_AR_01	9	0
2.	RWE Trading	P220_AR_02	10	0
3.	EDF Energy	P220_AR_03	9	0
4.	Scottish and Southern Energy plc	P220_AR_04	8	0
5.	National Grid	P220_AR_05	1	0
6.	Uskmouth Power	P220_AR_06	1	0
7.	SAIC Ltd. (for and on behalf of ScottishPower)	P220_AR_07	7	0
8.	Energywatch	P220_AR_08	0	1
9.	E.ON UK plc	P220_AR_09	5	0
10.	Major Energy Users' Council (meuc)	P220_AR_10	0	1
11.	Chemical Industries Association	P220_AR_11	0	1

## P220 Assessment Procedure Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular, views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	<i>Laura Jeffs</i>
<b>Company Name:</b>	<i>Centrica</i>
<b>No. of BSC Parties Represented</b>	<i>9</i>
<b>Parties Represented</b>	<i>Accord Energy Ltd; British Gas Trading Ltd; Centrica Barry Ltd; Centrica Brigg Ltd; Centrica KL Ltd; Centrica KPS Ltd; Centrica PB Ltd; Centrica RPS Ltd; Centrica SHB Ltd</i>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>0</i>
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Supplier; Generator; Trader</i>
<b>Does this response contain confidential information?</b>	

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1	<p>Do you believe that Proposed Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?</p> <p>Please give rationale stating relevant objective(s).</p>	No	<p>Centrica believes that BSC objective a) is not relevant in the consideration of P220.</p> <p>Centrica is broadly in agreement that BSC Objective b) will be better facilitated by P220 but remains concerned that the information provided through the implementation of P220 will not be utilised by a number of companies that already have access to the P220 data items from alternative market sources. As a consequence, Centrica believes that P220 will not achieve improved self-balancing for these companies. Enhanced data availability may only assist in the operation of the GB Transmission System in relation to a very limited number of companies that have chosen</p>

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Q	Question	Response	Rationale
			<p>not to invest in prior access to the P220 data items.</p> <p>Centrica believes that BSC objective c) will be met in the implementation of P220 by providing easier navigation to key market data, particularly for market entrants.</p> <p>Centrica is concerned that the implementation costs for P220 far outweigh the benefits of the modification for existing industry players who have already used their own resources to access the data via other market sources. Throughout the modification process there has been very little evidence of demand from other industry players or an intention to make full use of the additional data items being proposed through P220. No representatives from such companies have been evident on the P220 Modification Group and very few responded to the participant impact assessment. Whilst new entrants may still benefit from the proposed market summary page, Centrica believes that this is not a sufficient justification for the industry to bear £800k. For the reasons outlined above, Centrica remains to be convinced that BSC objective d) is better facilitated by P220.</p> <p>Centrica believes that the implementation costs for P220 outweigh the potential benefits that P220 could bring to BSC objectives b) and c).</p>
2	<p>Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification?</p> <p>Please give rationale stating relevant objective(s).</p>	Yes	<p>Notwithstanding the comments outlined in question 1, Centrica believes that the alternative modification proposal will provide enhanced clarity and increased provision of information when compared with the original proposal. As a result, BSC objectives b) and c) will be better facilitated, however, Centrica's position on BSC objective d) still remains the same.</p>

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Q	Question	Response	Rationale
3	<p>Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?</p> <p>Please give rationale stating relevant objective(s).</p>	No	<p>Although, in Centrica's opinion, the alternative modification proposal aims to deliver a more favourable solution than the original proposal, Centrica retains its view that the implementation costs are too high and on that basis it does not recommend that the alternative is better than the baseline.</p> <p>A quantitative cost-benefit analysis needs to be carried out to help Centrica and other industry players to identify any potential material impacts/benefits of P220 implementation.</p>
4	<p>For each group of proposed new P220 BMRS data items listed in (a) to (g) below, please indicate in a reasonable level of detail how the provision of this information would or would not be of benefit to your organisation.</p> <p>For example, this might include details of any business processes in which you would use the new data, and how the new data might or might not:</p> <ul style="list-style-type: none"> <li>• Improve the efficiency of these processes;</li> <li>• Give the ability to make more informed commercial decisions; and/or</li> <li>• Improve self-balancing.</li> </ul> <p>Where possible, please tie the details provided back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.</p> <p>If able, participants are also invited to quantify any identified benefits and resulting cost savings.</p>	-	
	<p>a) Outturn and reference temperatures (Proposed and Alternative Modifications)</p>	-	<p>Centrica currently has access to ample meteorological information and it is unlikely that Centrica will seek to use the P220 information as a comparable source of data.</p> <p>In its simplest form, such data can be obtained from websites such as <a href="http://www.metcheck.com">www.metcheck.com</a>. The public availability of this data makes</p>

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Q	Question	Response	Rationale
			it hard to justify the implementation costs associated with P220.
	b) Wind generation forecast (Proposed and Alternative Modifications)	-	Centrica currently has access to ample meteorological information and it is unlikely that Centrica will seek to use the P220 information as a comparable source of data.  In its simplest form, such data can be obtained from websites such as <a href="http://www.metcheck.com">www.metcheck.com</a> . The public availability of this data makes it hard to justify the implementation costs associated with P220.
	c) Instantaneous and half-hourly generation by fuel type, including 'real-time' total demand outturn and half-hourly Interconnector flows (Proposed and Alternative Modifications)	-	Whilst this information is not currently available instantaneously, generation data from <a href="http://www.bmreports.com">www.bmreports.com</a> can presently be aggregated by fuel-type, following the settlement period. For this reason, it is not imperative that Centrica receive instantaneous data, although it would be a "nice to have".
	d) Daily energy volumes based on Transmission System Demand without trend data (Proposed Modification only)	-	This particular data item will be derived from operationally metered data and will therefore not provide the actual volumes as delivered in the BSC settlement data. Centrica would therefore have very limited use for this data item.
	e) Daily energy volumes based on Initial National Demand Out-Turn with trend data (Alternative Modification only)	-	This particular data item will be derived from operationally metered data and will therefore not provide the actual volumes as delivered in the BSC settlement data. Centrica would therefore have very limited use for this data item.
	f) Non-BM STOR Instructed Volumes (Proposed and Alternative Modifications)	-	Centrica would seek to use this information if the feed into BM Reports (and BSAD) is deemed to be instantaneous.
	g) 'Real-time' Transmission System Frequency (Alternative Modification only)	-	This data is currently readily available on National Grid's website and the inclusion of this data within the market summary page will provide little advantage to the industry.
5	Do you support the inclusion in the P220 solution of a real-time 'data incomplete' flag for the generation by fuel type data (as described in Section 6.5 of the consultation document), given that	Yes	Centrica feels that it is incomprehensible to publish incorrect data without any form of notification for the user. Despite the low probability of an error occurring (1 in 1000), this data is being

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	<p>this would significantly increase the Transmission Company's implementation costs and lead time?</p> <p>Please give rationale and, where possible, link these views to the Applicable BSC Objectives.</p> <p>If 'yes', please provide details of how the additional benefits of including this flag would outweigh the delay in implementation and increased costs (e.g. how the flag would enable you to gain additional value from the P220 data).</p>		<p>provided in an attempt to encourage users to improve their balancing position and should be sufficiently robust to be relied upon to make sound business decisions. If the user is unaware that a specific data point is incorrectly represented on a chart / table, this could have significant cost implications for the user.</p> <p>As aforementioned, Centrica would like to see a reduction in the costs associated with P220, however, should P220 be approved, it is imperative that the validity flags are included. Alternative IS solutions should be investigated to ensure that the lowest cost approach is being utilised.</p>
6	<p>Do you believe that publication of any of the new BMRS data contained in the Proposed Modification or Alternative Modification could give rise to any confidentiality issues?</p> <p>Please give rationale and state relevant data items. Where possible, please link these views back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.</p>	Yes	<p>Although this issue does not currently impact Centrica, Centrica concurs to the view raised in the Modification Group that the 'instantaneous generation by fuel type' data may lead to confidential information being made publicly available should only a handful of power stations exist in a particular 'fuel type' category.</p> <p>This information could be used to influence market prices and should not be allowable under P220.</p>
7	<p>Do you support the Modification Group's initial recommendation that, if approved, P220 should be implemented in the November 2008 Release with a fall-back of the June 2009 Release? (note that, if the real-time 'data incomplete' flag was included in the solution, a November 2008 implementation would no longer be feasible).</p> <p>Please give rationale.</p>	Yes	<p>Centrica believes that, if approved, P220 should be implemented at least cost to the industry.</p> <p>Centrica has no specific preference over the implementation dates, however, Centrica questions the feasibility of the November 2008 implementation date as the approval timeline for this is extremely tight.</p> <p>Should P219 and P220 both gain Authority approval, it is imperative that Elexon and National Grid should strive to meet the same implementation date for both modifications in an attempt to achieve the £200k cost savings.</p>

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Q	Question	Response	Rationale
8	<p>Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? (please note that, whilst the Modification Group is unlikely to be able to consider the inclusion of further new data items under P220, respondents are still invited to identify any additional data requirements here which they believe should be considered separately to P220 in the future).</p> <p>Please give rationale for the proposed alternative solution(s), including how these might better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification and Alternative Modification developed by the Group.</p>	No	Through the Modification Group, Centrica raised a request for enhanced information on within day interconnector trades. It was recommended that this information should not sit within the market summary page so Centrica will strive to introduce this proposal through an alternative avenue.
9	<p>Does P220 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure?</p> <p>Please give rationale.</p>	No	
10	Are there any further comments on P220 that you wish to make?	No	

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 noon on Monday 21 January 2008** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email '**P220 Assessment Procedure Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Kathryn Coffin on 020 7380 4030, email address [kathryn.coffin@elexon.co.uk](mailto:kathryn.coffin@elexon.co.uk).

## P220 Assessment Procedure Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular, views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	Name: Bill Reed
Company Name:	RWE Trading
No. of BSC Parties Represented	10
Parties Represented	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i> RWE Trading GmbH, RWE Npower plc, Great Yarmouth Power Ltd, Npower Cogen Trading Ltd, Npower Direct Ltd, Npower Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd
No. of Non BSC Parties Represented (e.g. Agents)	None
Non Parties represented	Please list all non Parties responding on behalf of (including the respondent company if relevant).
<b>Role of Respondent</b>	(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributors / other – please state): Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent
<b>Does this response contain confidential information?</b>	No

Q	Question	Response	Rationale
1	Do you believe that Proposed Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?  Please give rationale stating relevant objective(s).	Neutral	We believe that the arguments in favour of the implementation of the modification proposal are finely balanced. In particular we are concerned at the overall cost without any demonstrable benefit. While the additional information would be "nice to have" we do not recognise a specific need for the information to be published. We would note that similar information is currently published on the BRMS or can be derived from this information (e.g. BMUs can be classified by fuel type) while other information is available from other commercial services (e.g. weather forecast data for wind farm output). We would be concerned if the publication of the



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Q	Question	Response	Rationale
			information undermined other commercial providers of data.
2	<p>Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification?</p> <p>Please give rationale stating relevant objective(s).</p>	Yes	The alternative is patently better than the original since it better fulfils the intent of the modification proposal and replicates data that is already published.
3	<p>Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?</p> <p>Please give rationale stating relevant objective(s).</p>	Neutral	<p>We believe that the arguments in favour of the implementation of the modification proposal are finely balanced. In particular we are concerned at the overall cost without any demonstrable benefit. While the additional information would be "nice to have" we do not recognise a specific need for the information to be published. We would note that similar information is currently published on the BRMS or can be derived from this information (e.g. BMUs can be classified by fuel type) while other information is available from other commercial services (e.g. weather forecast data for wind farm output). We would be concerned if the publication of the information undermined other commercial providers of data.</p>
4	<p>For each group of proposed new P220 BMRS data items listed in (a) to (g) below, please indicate in a reasonable level of detail how the provision of this information would or would not be of benefit to your organisation.</p> <p>For example, this might include details of any business processes in which you would use the new data, and how the new data might or might not:</p> <ul style="list-style-type: none"> <li>• Improve the efficiency of these processes;</li> <li>• Give the ability to make more informed commercial decisions; and/or</li> <li>• Improve self-balancing.</li> </ul> <p>Where possible, please tie the details provided back to the arguments expressed in respect of the Applicable BSC Objectives</p>	-	

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Q	Question	Response	Rationale
	<p>under Qs 1-3 above.</p> <p>If able, participants are also invited to quantify any identified benefits and resulting cost savings.</p>		
	a) Outturn and reference temperatures (Proposed and Alternative Modifications)	-	
	b) Wind generation forecast (Proposed and Alternative Modifications)	-	
	c) Instantaneous and half-hourly generation by fuel type, including 'real-time' total demand outturn and half-hourly Interconnector flows (Proposed and Alternative Modifications)	-	
	d) Daily energy volumes based on Transmission System Demand without trend data (Proposed Modification only)	-	
	e) Daily energy volumes based on Initial National Demand Out-Turn with trend data (Alternative Modification only)	-	
	f) Non-BM STOR Instructed Volumes (Proposed and Alternative Modifications)	-	
	g) 'Real-time' Transmission System Frequency (Alternative Modification only)	-	
5	<p>Do you support the inclusion in the P220 solution of a real-time 'data incomplete' flag for the generation by fuel type data (as described in Section 6.5 of the consultation document), given that this would significantly increase the Transmission Company's implementation costs and lead time?</p> <p>Please give rationale and, where possible, link these views to the Applicable BSC Objectives.</p>	Yes	<p>We believe that the provision of some form of flag or message associated with incomplete data would enable users to understand the aggregated data that is being published. The absence of such a flag may raise concerns that the data that is being published may be misleading (e.g. indicating that certain types of generation are not exporting when in fact it is). If the information is being used to inform trading strategies then this may result in an inefficient outcome.</p>

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Q	Question	Response	Rationale
	If 'yes', please provide details of how the additional benefits of including this flag would outweigh the delay in implementation and increased costs (e.g. how the flag would enable you to gain additional value from the P220 data).		We recognise that the provision of a flag or message may impact on implementation timescales. We believe that it is important to explore whether the provision of a message or flag could be provided in a pragmatic way that does not require an expensive IT solution
6	Do you believe that publication of any of the new BMRS data contained in the Proposed Modification or Alternative Modification could give rise to any confidentiality issues?  Please give rationale and state relevant data items. Where possible, please link these views back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.	No	
7	Do you support the Modification Group's initial recommendation that, if approved, P220 should be implemented in the November 2008 Release with a fall-back of the June 2009 Release? (note that, if the real-time 'data incomplete' flag was included in the solution, a November 2008 implementation would no longer be feasible).  Please give rationale.	Yes	The data should be published as soon as practicable possibly as part of a phased release.
8	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? (please note that, whilst the Modification Group is unlikely to be able to consider the inclusion of further new data items under P220, respondents are still invited to identify any additional data requirements here which they believe should be considered separately to P220 in the future).  Please give rationale for the proposed alternative solution(s), including how these might better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification and Alternative Modification developed by the Group.	No	
9	Does P220 raise any issues that you believe have not been	No	

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Q	Question	Response	Rationale
	identified so far and that should be progressed as part of the Assessment Procedure?  Please give rationale.		
10	Are there any further comments on P220 that you wish to make?	No	

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 noon** on **Monday 21 January 2008** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email '**P220 Assessment Procedure Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Kathryn Coffin on 020 7380 4030, email address [kathryn.coffin@elexon.co.uk](mailto:kathryn.coffin@elexon.co.uk).



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BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular, views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	Stephen Carter
<b>Company Name:</b>	EDF Energy
<b>No. of BSC Parties Represented</b>	9
<b>Parties Represented</b>	EDF Energy Networks (EPN) plc; EDF Energy Networks (LPN) plc; EDF Energy Networks (SPN) plc; EDF Energy (Sutton Bridge Power); EDF Energy (Cottam Power) Ltd; EDF Energy (West Burton Power) Ltd; EDF Energy plc; EDF Energy Customers Plc; Seeboard Energy Limited
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	Supplier/Generator/ Trader / Distributors
<b>Does this response contain confidential information?</b>	

Q	Question	Response	Rationale
1	<p>Do you believe that Proposed Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?</p> <p>Please give rationale stating relevant objective(s).</p>	Yes	<p>Objective a) This mod should not have any impact on the efficient discharge by the licensee of the obligation imposed by its licence.</p> <p>Objective b) Improved information should only increase the ability of Parties to balance their contracts. Where this aids the efficient, economic and co-ordinated operation of the GBTS then this modification should be at least as good as the current arrangements and has the potential to improve them.</p> <p>Objective c) Again, we hope the improved information will lead to a Pareto improvement, where some Parties will be made better off and no parties should be any worse off. There is the possibility that</p>

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Q	Question	Response	Rationale
			<p>the benefits from increased competition and efficiency may only be small, but they also have the potential to be greater in ways in which are not reasonably quantifiable. E.g. they may help increase the general understanding and interaction of smaller demand side players, or if not the demand side players individually, there may be 3<sup>rd</sup> parties such as energy consultants (who may not have the resources to employ armies of analysts to develop highly complex decision models, but may be able to use this data to look for general trends and relationships in order to provide or justify strategic advice) who readily benefit.</p> <p>There may also be very small information benefits (in terms of man-hours saved and better understanding) that are applied to very large numbers throughout the industry - especially for those who are not always actively exposed to the analytical side of the market (e.g. management, finance, risk etc), but wish to use the BMRS as a general information tool to help them have a wider understanding of the current market conditions in which they operate. Summing these small benefits into the future (although appropriately discounting) and across very large numbers (the general market, not just a few BSC parties), we feel it is <i>more likely</i> to outweigh the one-off costs of implementation (although there is no way of quantifying this).</p> <p>UNC Modification 006 provided similar market fundamentals reporting and this proved to be highly useful and an example where small players have significantly benefited from such information dissemination.</p> <p>Objective d) The possible contention with the modification surrounds value for money and whether the benefits arising from the improved information are greater than the one-off costs of implementation (which are far from insignificant) and hence the efficiency surrounding the implementation and administration of the arrangements. While we recognise this is a concern and some 'hard' quantifiable evidence of the value of the benefits would make a positive decision easier, we are minded to believe that the</p>

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Q	Question	Response	Rationale
			<p>benefits over the long-run probably will outweigh the costs for the reasons outlined above.</p> <p>We share the concern that the costs of upgrading National Grid and Elexon systems are very high. It is important to ensure that systems are suitably robust so that future modifications and upgrades to the reporting system less expensive.</p>
2	<p>Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification?</p> <p>Please give rationale stating relevant objective(s).</p>	Yes	Yes, the Alternative Objective is superior to the Original modification because of the inclusion of the aspects.
3	<p>Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?</p> <p>Please give rationale stating relevant objective(s).</p>	Yes	For the same reasons as set out above in comparing Original Modification against Code baseline.
4	<p>For each group of proposed new P220 BMRS data items listed in (a) to (g) below, please indicate in a reasonable level of detail how the provision of this information would or would not be of benefit to your organisation.</p> <p>For example, this might include details of any business processes in which you would use the new data, and how the new data might or might not:</p> <ul style="list-style-type: none"> <li>• Improve the efficiency of these processes;</li> <li>• Give the ability to make more informed commercial decisions; and/or</li> <li>• Improve self-balancing.</li> </ul> <p>Where possible, please tie the details provided back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.</p>	-	

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	If able, participants are also invited to quantify any identified benefits and resulting cost savings.		
a)	Outturn and reference temperatures (Proposed and Alternative Modifications)	-	Not quite so useful as we already do this ourselves, but could be useful for any agents that don't have the ability to quickly gather outturn and reference temperatures.
b)	Wind generation forecast (Proposed and Alternative Modifications)	-	<p>Wind generation forecast would be included in the sets of information used by both demand forecast teams and also by trading analytics and energy management centre to help predict generation. Increasing wind generation capacity has a significant impact on the position of agents with and without wind generation in their portfolios.</p> <p>We believe that given the expectation of a large amount of wind capacity expected to enter the system over the next decade, this stream of information will prove very useful for all types of players. It will be probably used in day-ahead trading as an element to help form expectations of overall market length and other players' position.</p>
c)	Instantaneous and half-hourly generation by fuel type, including 'real-time' total demand outturn and half-hourly Interconnector flows (Proposed and Alternative Modifications)	-	<p>Instantaneous generation by fuel type would be used by trading analytics as a further aid to analysis of the within day market. A better understanding can be made of the short term market fundamentals and the dynamics in the stack.</p> <p>In the longer term, the market may start to learn trends and signals regarding agent behaviour from observation of operational metering.</p>
d)	Daily energy volumes based on Transmission System Demand without trend data (Proposed Modification only)	-	
e)	Daily energy volumes based on Initial National Demand Out-Turn with trend data (Alternative Modification only)	-	



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	f) Non-BM STOR Instructed Volumes (Proposed and Alternative Modifications)	-	May be used in demand forecasting.
	g) 'Real-time' Transmission System Frequency (Alternative Modification only)	-	Proper real time frequency may allow agents to act in the short term market to act on plant trips before the re-declaration of Maximum Export Limit (MEL), although this information is available on the NG website.
5	<p>Do you support the inclusion in the P220 solution of a real-time 'data incomplete' flag for the generation by fuel type data (as described in Section 6.5 of the consultation document), given that this would significantly increase the Transmission Company's implementation costs and lead time?</p> <p>Please give rationale and, where possible, link these views to the Applicable BSC Objectives.</p> <p>If 'yes', please provide details of how the additional benefits of including this flag would outweigh the delay in implementation and increased costs (e.g. how the flag would enable you to gain additional value from the P220 data).</p>	No	<p>The expense of the flagging process seems to heavily outweigh the benefit. The NG analysis of Operational Metering suggests that errors are rare (20 occasions over 69 days and across 227 meters) and manual correction of data is quick and efficient.</p> <p>More fundamentally, providing that agents are aware of the possibility (or even better, likelihood) of meter error, they will still make rational decisions. The probability of erroneous data will be included in the decision making process.</p> <p>Finally, we believe that few agents will rely solely on the near real time Operational Metering data for making big-money decisions, rather it will form part of a portfolio of information that well-informed agents can then use to make efficient decisions.</p>
6	<p>Do you believe that publication of any of the new BMRS data contained in the Proposed Modification or Alternative Modification could give rise to any confidentiality issues?</p> <p>Please give rationale and state relevant data items. Where possible, please link these views back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.</p>	Maybe	<p>There may be a possible confidentiality issue regarding plant 'trips' (in so much as it may be possible to see oil plant trips easier than coal or gas). However, as has been raised in Group discussions, 'trips' can already be seen through re-declaration of MEL. In addition, it could be argued that what you get is not so much an erosion of confidentiality (especially since no contracts are involved), but instead an increase in market transparency.</p> <p>If confidentiality proves to be a serious issue, a small degree of aggregating (such as including Oil plant in the 'Other' category) may be a solution. This was found to be a suitable approach in the UNC 006 Modification.</p>

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Q	Question	Response	Rationale
7	<p>Do you support the Modification Group's initial recommendation that, if approved, P220 should be implemented in the November 2008 Release with a fall-back of the June 2009 Release? (note that, if the real-time 'data incomplete' flag was included in the solution, a November 2008 implementation would no longer be feasible).</p> <p>Please give rationale.</p>	Yes	Yes, if approved there is no reason to deviate from the November release, providing that a decision is reached at an early enough date for National Grid to make the necessary changes in time.
8	<p>Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? (please note that, whilst the Modification Group is unlikely to be able to consider the inclusion of further new data items under P220, respondents are still invited to identify any additional data requirements here which they believe should be considered separately to P220 in the future).</p> <p>Please give rationale for the proposed alternative solution(s), including how these might better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification and Alternative Modification developed by the Group.</p>	No	
9	<p>Does P220 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure?</p> <p>Please give rationale.</p>	Yes/No	
10	Are there any further comments on P220 that you wish to make?	Yes	Again, we would like to re-iterate that future designs of the reporting system, both on the SO side and the Reporting Agent side, should be robust enough to allow for similar changes to be made at a much more cost efficient manner.

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment

## P220 Assessment Consultation Form

Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 noon on Monday 21 January 2008** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email '**P220 Assessment Procedure Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Kathryn Coffin on 020 7380 4030, email address [kathryn.coffin@elexon.co.uk](mailto:kathryn.coffin@elexon.co.uk).



## P220 Assessment Procedure Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular, views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	Garth Graham
<b>Company Name:</b>	Scottish and Southern Energy plc
<b>No. of BSC Parties Represented</b>	8
<b>Parties Represented</b>	SSE Energy Supply Ltd., SSE Generation Ltd., Keadby Generation Ltd., Medway Power Ltd., SSE (Ireland) Ltd., Slough Energy Supplies Ltd., Southern Electric Power Distribution plc., Scottish Hydro-Electric Power Distribution Ltd.
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	0
<b>Non Parties represented</b>	N/A
<b>Role of Respondent</b>	Supplier/Generator/Trader/Distributors
<b>Does this response contain confidential information?</b>	

Q	Question	Response	Rationale
1	Do you believe that Proposed Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?  Please give rationale stating relevant objective(s).	Yes	
2	Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification?  Please give rationale stating relevant objective(s).	Yes	

## P220 Assessment Consultation Form

Q	Question	Response	Rationale
3	<p>Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?</p> <p>Please give rationale stating relevant objective(s).</p>	Yes	
4	<p>For each group of proposed new P220 BMRS data items listed in (a) to (g) below, please indicate in a reasonable level of detail how the provision of this information would or would not be of benefit to your organisation.</p> <p>For example, this might include details of any business processes in which you would use the new data, and how the new data might or might not:</p> <ul style="list-style-type: none"> <li>• Improve the efficiency of these processes;</li> <li>• Give the ability to make more informed commercial decisions; and/or</li> <li>• Improve self-balancing.</li> </ul> <p>Where possible, please tie the details provided back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.</p> <p>If able, participants are also invited to quantify any identified benefits and resulting cost savings.</p>	-	<p>Broadly speaking we would anticipate that the provision of the additional information envisaged by P220 (Original and Alternative) will have a positive impact in terms of assisting market participants to (i) Improve the efficiency of their processes (ii) improve their ability to make more informed commercial decisions and (iii) Improve their self-balancing.</p>
	<p>a) Outturn and reference temperatures (Proposed and Alternative Modifications)</p>	-	
	<p>b) Wind generation forecast (Proposed and Alternative Modifications)</p>	-	

## P220 Assessment Consultation Form

Q	Question	Response	Rationale
	<p>c) Instantaneous and half-hourly generation by fuel type, including 'real-time' total demand outturn and half-hourly Interconnector flows (Proposed and Alternative Modifications)</p>	-	<p>We note the list of plant type shown in Table 7 (at the top of pg 17). Where is the definition of these plant types? Into which category is a power station which can burn (i) oil and gas (ii) coal and gas placed? If its on the basis of its 'primary' fuel used, over what period? What if the primary fuel used changes? In addition where is a 'pump storage' power station which also has 'hydro' run-off placed?</p> <p>Given the Government's aspirations for growth of CHP generation is it appropriate that this potentially large category of generation is not catered for in this proposed P220 list (and thus, presumably, resides under 'Other').</p> <p>Noting the definition of 'hydro' in the Transmission Company Impact Assessment (Q11) is not water used (to raise steam) by all thermal plant to generate electricity?(!)</p> <p>We do not agree with the statement in 6.5.1.1:-</p> <p>"Neither the Proposer nor the Group anticipated that changes would be made to these eleven fuel-type categories in the foreseeable future. For this reason, the Group agreed that it should not be a requirement of the P220 solution for the BMRA to develop flexibility regarding the number of categories which could be held in its systems."</p> <p>We understand that a number of additional interconnectors (to the Netherlands, Norway and Ireland for example) are being talked about/developed. Under the proposed solution for P220 these would presumably have to fall into the 'Other' category, which would be discriminatory when compared with the treatment of the existing French and Northern Ireland (Moyle) interconnectors. The Group should reconsider including 'flexibility' into the BMRA to permit additional definitions (if required) in the future.</p> <p>As an aside, looking at the list in 6.5.1.1, we were unaware of any interconnector between France and Scotland(!) or between Scotland and Ireland, although there is one between Scotland and Northern Ireland (Moyle).</p>

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Q	Question	Response	Rationale
	d) Daily energy volumes based on Transmission System Demand without trend data (Proposed Modification only)	-	<p>We welcome proposed improvement in daily energy volume information.</p> <p>However, it is imperative that the data set used by the GBSO to forecast GB demand is the same as that used to report the daily energy volume later. This will enable market participants to have a clear understanding of the situation going forward and to prepare their own forecasts accordingly (based on a known/anticipated GBSO forecast of 'X'%).</p> <p>For the avoidance of doubt, this information daily energy volume should be published the day after, but on the basis of 48 separate pieces of information, rather than a single figure for the whole day.</p> <p>In addition to this its important to ensure that this proposal to publish demand data does NOT mean that the existing demand information provided by the GBSO is removed. P220 (original and alternative) is intended to build on what we have now, not remove/replace what we have now.</p>

## P220 Assessment Consultation Form

Q	Question	Response	Rationale
	e) Daily energy volumes based on Initial National Demand Out-Turn with trend data (Alternative Modification only)	-	<p>We welcome proposed improvement in daily energy volume information.</p> <p>However, it is imperative that the data set used by the GBSO to forecast GB demand is the same as that used to report the daily energy volume later. This will enable market participants to have a clear understanding of the situation going forward and to prepare their own forecasts accordingly (based on a known/anticipated GBSO forecast of 'X'%).</p> <p>For the avoidance of doubt, this information daily energy volume should be published the day after, but on the basis of 48 separate pieces of information, rather than a single figure for the whole day.</p> <p>In addition to this its important to ensure that this proposal to publish demand data does NOT mean that the existing demand information provided by the GBSO is removed. P220 (original and alternative) is intended to build on what we have now, not remove/replace what we have now.</p>
	f) Non-BM STOR Instructed Volumes (Proposed and Alternative Modifications)	-	
	g) 'Real-time' Transmission System Frequency (Alternative Modification only)	-	<p>Whilst we welcome the addition of this information in principle, we are mindful of the costs (and potential delay in implementation) that might arise. If these costs (and time delays) are substantial then we would prefer to have something (i.e. P220 Original) now and consider what additional data items could be included at a later date (i.e. P220 Alternative). That having been said, if we can (without significant cost/time delay) implement P220 Alternative then we would prefer that to be done (over P220 original).</p>
5	Do you support the inclusion in the P220 solution of a real-time 'data incomplete' flag for the generation by fuel type data (as described in Section 6.5 of the consultation document), given that this would significantly increase the Transmission Company's	Yes/No	<p>Whilst we welcome the addition of this information in principle, we are mindful of the costs (and potential delay in implementation) that might arise. If these costs (and time delays) are substantial then we would prefer to have something (i.e. P220 Original) now and consider what additional data items could be included at a</p>



## P220 Assessment Consultation Form

Q	Question	Response	Rationale
	<p>implementation costs and lead time?</p> <p>Please give rationale and, where possible, link these views to the Applicable BSC Objectives.</p> <p>If 'yes', please provide details of how the additional benefits of including this flag would outweigh the delay in implementation and increased costs (e.g. how the flag would enable you to gain additional value from the P220 data).</p>		<p>later date (i.e. P220 Alternative). That having been said, if we can (without significant cost/time delay) implement P220 Alternative then we would prefer that to be done (over P220 original).</p>
6	<p>Do you believe that publication of any of the new BMRS data contained in the Proposed Modification or Alternative Modification could give rise to any confidentiality issues?</p> <p>Please give rationale and state relevant data items. Where possible, please link these views back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.</p>		<p>It needs to be recognised that in disaggregating the generation information into eleven (and possibly more – see our comments in 4(c) above) plant type categories that it will be increasingly possible to identify the instantaneous output from certain BSC Parties; such as British Energy ('nuclear') and ourselves ('hydro'); whilst for other plant types (depending on the definition used) maybe very clear to a competitor as only two BSC Parties may own that plant type; which might be the case, for example with RWE and E.On ('oil'? and 'OCGT'?) or indeed International Power, Scottish Power and ourselves ('pump storage?'). Whilst individual plant information will be forthcoming via the BNRS in due course, publishing it in an 'instantaneous' format may well alter the way this form of information is used in the competitive marketplace.</p>
7	<p>Do you support the Modification Group's initial recommendation that, if approved, P220 should be implemented in the November 2008 Release with a fall-back of the June 2009 Release? (note that, if the real-time 'data incomplete' flag was included in the solution, a November 2008 implementation would no longer be feasible).</p> <p>Please give rationale.</p>	Yes	

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Q	Question	Response	Rationale
8	<p>Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? (please note that, whilst the Modification Group is unlikely to be able to consider the inclusion of further new data items under P220, respondents are still invited to identify any additional data requirements here which they believe should be considered separately to P220 in the future).</p> <p>Please give rationale for the proposed alternative solution(s), including how these might better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification and Alternative Modification developed by the Group.</p>	No	Not at this time.
9	<p>Does P220 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure?</p> <p>Please give rationale.</p>	Yes	See our comments elsewhere in this response.
10	Are there any further comments on P220 that you wish to make?	Yes	<p>Mindful of the planned improvements to the BMRS (including, but not limited to, the P219 and P220 changes) we have concerns that at times of rota disconnections or similar electricity supply disruption that media and public interest in the real-time actual demand situation, forecast demand, actual overall generation output etc., (functionality which is to be included/upgraded with the proposed P219 and P220 changes) will result in a vast surge in 'hits' on the BMRS. This could result in either a much slower service for all users or, in extremis, a temporary failure of the whole BMRS service.</p> <p>Given the operational importance of the BMRS to market participants (which is the priority) we believe that serious consideration should be given to having a password protected mirror/shadow site for the Low Grade service that can be utilised only by market participants at times of BMRS stress or failure.</p>

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Q	Question	Response	Rationale
			Clearly such arrangements should be put in place well in advance so that market participants know what will happen (and know their passwords) in the event this is required.

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## P220 Assessment Procedure Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular, views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	<i>Shafqat Ali</i>
<b>Company Name:</b>	<i>National Grid</i>
<b>No. of BSC Parties Represented</b>	<i>1</i>
<b>Parties Represented</b>	<i>National Grid</i>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>-</i>
<b>Non Parties represented</b>	<i>-</i>
<b>Role of Respondent</b>	<i>Transmission Company</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1	Do you believe that Proposed Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?  Please give rationale stating relevant objective(s).	Yes	Provision of more consistent and transparent information should improve self-balancing and allow market participants to manage electricity related costs and risks; this should, in turn, improve the efficient, economic and co-ordinated operation of the GB transmission system (Applicable BSC Objective (b)).  Increase in information transparency and availability of improved market information to all participants should promote effective competition in the generation and supply of electricity (Applicable BSC Objective (c)).
2	Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification?	Yes	National Grid believes that the provision of additional data under the Alternative Modification would better facilitate the Applicable BSC objectives (b) and (c) outlined in item 1 above, compared with

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Q	Question	Response	Rationale
	Please give rationale stating relevant objective(s).		the Proposed Modification. We believe that the tramline data on energy volumes will be useful to set the daily outturn energy in a context and that the improvements to the robustness of the provision route for frequency data are additional positive features of the alternative.
3	Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?  Please give rationale stating relevant objective(s).	Yes	For reasons outlined in items 1 and 2 above, National Grid believes that the Alternative Modification would better facilitate the Applicable BSC objectives (b) and (c), compared with the current Code baseline.
4	For each group of proposed new P220 BMRS data items listed in (a) to (g) below, please indicate in a reasonable level of detail how the provision of this information would or would not be of benefit to your organisation.  For example, this might include details of any business processes in which you would use the new data, and how the new data might or might not: <ul style="list-style-type: none"> <li>• Improve the efficiency of these processes;</li> <li>• Give the ability to make more informed commercial decisions; and/or</li> <li>• Improve self-balancing.</li> </ul> Where possible, please tie the details provided back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.  If able, participants are also invited to quantify any identified benefits and resulting cost savings.	-	National Grid believes that the main benefits of additional information and improved information transparency are likely to be realised by the market e.g. market participants will be able to have more transparency over a number of system operation and market factors that affect energy costs and risks. We do not expect any material financial benefits to the System Operator, We expect the benefits of P220 to accrue to customers through the potential for large consumers, small suppliers and large energy companies to manage their risks and opportunities. The value of the electricity market at about £30bn per year means that even small changes to improve market function leveraged against such a large overall cost have positive cost benefit cases.  In this case we believe that the benefits can be sufficiently well expressed in qualitative terms to support this modification going ahead.  We also note that benefits ascribed to information provision improvements are often larger than may initially be thought and note Ofgem's Impact Assessment on UNC006 "publication of near real time data at UK sub terminals" <sup>1</sup> , that estimated the net benefits of this information in the range £82.87m - £122.46m

<sup>1</sup> <http://www.nationalgrid.com/uk/Electricity/Data/electricitymarketinfo/information/conclusionrep.htm>

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Q	Question	Response	Rationale
			<p>(taking into account IT costs of £1.4m). This assessment was for the market benefits of introducing more transparency to information on gas terminal flows.</p> <p><b>Market benefits identified by respondents via National Grid's consultation on market information</b></p> <p>As we would be providing this data and already use it operationally we cannot identify benefits to National Grid for publishing the data on BMRS. However as part of our consultation on market information, the market participants identified a range of benefits resulting from additional market information and improved information transparency. Details of these benefits are summarised in National Grid' Conclusions Report. The benefits identified by the market participants to explicit consultation questions (items (b), (c) and (f) below) are summarised below. We have also identified some other potential benefit areas where we could see a potential for customers to make use of the data items:</p>
a)	Outturn and reference temperatures (Proposed and Alternative Modifications)	-	<p>The previous day outturn temperatures compared with reference temperatures will benefit consumers as information to input to their assessments of likely peak electricity demand levels. The recent temperature trend in outturn and relative to the temperature benchmarks may assist in any demand management decisions either for costs such as Triads.</p>
b)	Wind generation forecast (Proposed and Alternative Modifications)	-	<p>i. "... will enlighten participants to the scale of potential risks they might face if the wind generation does not happen as expected...".</p> <p>ii. "As installed wind capacity increases the contribution of wind to the overall UK generation mix will increase, making accurate wind data more important".</p> <p>iii. "As the proportion of wind generation increase on the system, the impact of variations in wind generation will become more significant and therefore become vital information, with the potential of impacting price".</p> <p>iv. "With wind forming an increased component of the generation mix</p>

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Q	Question	Response	Rationale
			<p>this would be useful data".</p> <p>v. "Provide signals for reserve".</p> <p>vi. "This information would increase market transparency".</p> <p>vii. "... as renewables (wind generation) increase further the rate of output may add pressure to electricity prices (as witnessed in Germany) ... this information would be valuable and again help better inform parties in the market".</p>
	c) Instantaneous and half-hourly generation by fuel type, including 'real-time' total demand outturn and half-hourly Interconnector flows (Proposed and Alternative Modifications)	-	<p>i. "This would be a very useful addition. Current data capture only allows users to see FPNs and BOAs and carry out analysis on the back of this. Such data takes no account of deviations from these figures, due to plant trips etc. Being able to see this data broken down to half-hourly granularity would allow market participants to carry out more accurate, close to real-time analysis, of plant availability etc.".</p> <p>ii. "An understanding of the impact of fuel utilisation on market prices is important".</p> <p>iii. "To assist environmental impact analysis".</p> <p>iv. "... the breakdown of generation outturn by fuel type will promote better understand of the market and therefore more informed commercial decisions".</p>
	d) Daily energy volumes based on Transmission System Demand without trend data (Proposed Modification only)	-	-
	e) Daily energy volumes based on Initial National Demand Out-Turn with trend data (Alternative Modification only)	-	<p>This item was a data item requested by consumers and therefore has been included in the modification proposal. We believe that a high level view of how much energy was consumed on a day set in the context of warm, cold and normal conditions could be a useful data item in understanding energy market conditions. A practical use of the data could be for a smaller niche supplier of energy who has a view of their market share who could then perform a cross check on their contracted energy against their fraction of the contracted energy transported.</p>
	f) Non-BM STOR Instructed Volumes (Proposed and	-	<p>i. "The publication of this information provides market participates with an understanding of the actions taken by the</p>

## P220 Assessment Consultation Form

Q	Question	Response	Rationale
	Alternative Modifications)		<p>System Operator (SO) to manage the system".</p> <p>ii. "Transparency for balancing services".</p> <p>iii. "This would help parties better understand demand side participation in the electricity market".</p>
	g) 'Real-time' Transmission System Frequency (Alternative Modification only)	-	<p>Frequency is one of the key variables we measure and indicates at a high level the stability of the power system. Changes in frequency can point towards operational issues for National Grid, Generators or DNO's and transparency of any issues will aid the markets function. Currently the frequency data is "framed" on the new summary page from our website but there are potential issues with this temporary framing solution. We believe a more robust way of ensuring this data item has high availability as other BMRS data items is through providing this as a data item under the BSC.</p>
5	<p>Do you support the inclusion in the P220 solution of a real-time 'data incomplete' flag for the generation by fuel type data (as described in Section 6.5 of the consultation document), given that this would significantly increase the Transmission Company's implementation costs and lead time?</p> <p>Please give rationale and, where possible, link these views to the Applicable BSC Objectives.</p> <p>If 'yes', please provide details of how the additional benefits of including this flag would outweigh the delay in implementation and increased costs (e.g. how the flag would enable you to gain additional value from the P220 data).</p>	No	<p>National Grid has provided a detailed response as part of the Transmission Company Analysis; this response is restated below:</p> <p>"We have further investigated the quality of the operational metering feeds that we will use to provide the data for P220 for generation by fuel type since the discussions in the modification group. We expect that the base data quality will be reasonable and the data will reflect the output of generation by fuel type. Users of the data will of course need to develop their level of comfort with the data through experience and use this to inform the level of reliance they chose to place on it.</p> <p>Our main operational metering system is the IEMS which contains metering data at a detailed level of granularity and some data flags used by National Grid. We are unsure as to the usefulness of our flags to other users and would need to work with them to develop what flags and associated rules would deliver value for them. We are concerned that quality flagging a generation by fuel type number made up by the aggregation of many metered outputs has limited practical value itself because it may not be possible for users to know if the flagged issue is with one, two or more meters. IEMS is our singly most critical operational system and we have</p>



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Q	Question	Response	Rationale
			<p>sought to manage this modification's impact upon it. Bringing data flags into P220 mean our complex IEMS system is brought into scope. Cost and time impacts on P220 delivery of around £500k and a further 6 months to develop the solution once user requirements have been established will be incurred. This time is in addition to the 6 months currently estimated for P220 giving a 12 month development time in total.</p> <p>We believe that progressing P220 without data quality flags is the best option because of the cost and time impact of providing data flags. Assuming P220 is delivered; the market will then have some experience of the data quality provided and then will be in an improved position to assess the value of this functionality which could be looked at as a future development".</p>
6	<p>Do you believe that publication of any of the new BMRS data contained in the Proposed Modification or Alternative Modification could give rise to any confidentiality issues?</p> <p>Please give rationale and state relevant data items. Where possible, please link these views back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.</p>	No	<p>National Grid does not envisage any new additional confidentiality issues being created as a result of P220's implementation.</p>
7	<p>Do you support the Modification Group's initial recommendation that, if approved, P220 should be implemented in the November 2008 Release with a fall-back of the June 2009 Release? (note that, if the real-time 'data incomplete' flag was included in the solution, a November 2008 implementation would no longer be feasible).</p> <p>Please give rationale.</p>	Yes	<p>National Grid supports the Modification Group's initial recommendation that, if approved, P220 should be implemented in the November 2008 Release with a fall-back of the June 2009 Release. This is because we support early access to the potential benefits this modification offers and do not believe delaying implementation until June 2009 offers significant additional benefits to offset forgone benefits between November 08 and June 09.</p> <p>As explained in item 5, National grid believes that implementation of P220 should not be delayed to allow a data incomplete flag to</p>

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Q	Question	Response	Rationale
			be provided. We support an approach that implements P220 in November 08, followed by operational experience that will determine if data flagging is of value or not.
8	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? (please note that, whilst the Modification Group is unlikely to be able to consider the inclusion of further new data items under P220, respondents are still invited to identify any additional data requirements here which they believe should be considered separately to P220 in the future).  Please give rationale for the proposed alternative solution(s), including how these might better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification and Alternative Modification developed by the Group.	No	-
9	Does P220 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure?  Please give rationale.	No	-
10	Are there any further comments on P220 that you wish to make?	No	-

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## P220 Assessment Procedure Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular, views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	Lisa Waters
<b>Company Name:</b>	Uskmouth Power
<b>No. of BSC Parties Represented</b>	1
<b>Parties Represented</b>	Uskmouth Power
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	0
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	Generator
<b>Does this response contain confidential information?</b>	No

Q	Question	Response	Rationale
1	Do you believe that Proposed Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline? Please give rationale stating relevant objective(s).	Yes	It would improve the economic efficiency of the market to increase the data provision informing the decisions of market players. It would also improve the efficiency of the SO's role as with more information the market players will be better able to respond to the market fundamentals reducing the role of the SO.
2	Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification? Please give rationale stating relevant objective(s).	Yes	The data is more valuable to the participants in judging the position of the market. The fulfilment of the relevant objectives is as above, but we believe the alternative is better than the original.

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Q	Question	Response	Rationale
3	<p>Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?</p> <p>Please give rationale stating relevant objective(s).</p>	Yes	
4	<p>For each group of proposed new P220 BMRS data items listed in (a) to (g) below, please indicate in a reasonable level of detail how the provision of this information would or would not be of benefit to your organisation.</p> <p>For example, this might include details of any business processes in which you would use the new data, and how the new data might or might not:</p> <ul style="list-style-type: none"> <li>• Improve the efficiency of these processes;</li> <li>• Give the ability to make more informed commercial decisions; and/or</li> <li>• Improve self-balancing.</li> </ul> <p>Where possible, please tie the details provided back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.</p> <p>If able, participants are also invited to quantify any identified benefits and resulting cost savings.</p>	-	Uskmouth support the provision of as much detail as possible for all data items.
	<p>a) Outturn and reference temperatures (Proposed and Alternative Modifications)</p>	-	Temperature data is important in forecasting likely changes to demand. Over tie we can build a better picture about what changes in temperature does to both demand and generation performance.
	<p>b) Wind generation forecast (Proposed and Alternative Modifications)</p>	-	This data is vital in the market knowing if/when reserve is likely to be needed. It will also help highlight to the Government the potential costs of increasing wind on the system. We will also be able to get a view on how good at forecasting wind NG is and whether they are taking inefficient balancing actions as a result of

## P220 Assessment Consultation Form

Q	Question	Response	Rationale
			the unpredictable nature of wind. Knowing just the peak is less useful than knowing the profile.
	c) Instantaneous and half-hourly generation by fuel type, including 'real-time' total demand outturn and half-hourly Interconnector flows (Proposed and Alternative Modifications)	-	This will simply highlight the relative prices of the input fuels and the performance of the relative generation types. This is more interesting than that of specific business use.
	d) Daily energy volumes based on Transmission System Demand without trend data (Proposed Modification only)	-	Demand data is important in forecasting generation output and getting plant ready to run as demand increases. Taken with the other data, this will give a clearer view of how the day is developing.
	e) Daily energy volumes based on Initial National Demand Out-Turn with trend data (Alternative Modification only)	-	Knowing the trends increases the value of the data as it will help the market prepare for changes in demand.
	f) Non-BM STOR Instructed Volumes (Proposed and Alternative Modifications)	-	Again it adds to the overall clarity of the market view of all participants.
	g) 'Real-time' Transmission System Frequency (Alternative Modification only)	-	Helps to tell participants about the state of the system.
5	<p>Do you support the inclusion in the P220 solution of a real-time 'data incomplete' flag for the generation by fuel type data (as described in Section 6.5 of the consultation document), given that this would significantly increase the Transmission Company's implementation costs and lead time?</p> <p>Please give rationale and, where possible, link these views to the Applicable BSC Objectives.</p> <p>If 'yes', please provide details of how the additional benefits of including this flag would outweigh the delay in implementation and increased costs (e.g. how the flag would enable you to gain additional value from the P220 data).</p>	No	<p>We would support it as a longer term goal, but not worth delaying the implementation of the other changes for.</p> <p>It would be less efficient for all parties to delay the other changes waiting for this to be delivered.</p>

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Q	Question	Response	Rationale
6	<p>Do you believe that publication of any of the new BMRS data contained in the Proposed Modification or Alternative Modification could give rise to any confidentiality issues?</p> <p>Please give rationale and state relevant data items. Where possible, please link these views back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.</p>	No	
7	<p>Do you support the Modification Group's initial recommendation that, if approved, P220 should be implemented in the November 2008 Release with a fall-back of the June 2009 Release? (note that, if the real-time 'data incomplete' flag was included in the solution, a November 2008 implementation would no longer be feasible).</p> <p>Please give rationale.</p>	Yes	The sooner the market benefits from these changes the better.
8	<p>Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? (please note that, whilst the Modification Group is unlikely to be able to consider the inclusion of further new data items under P220, respondents are still invited to identify any additional data requirements here which they believe should be considered separately to P220 in the future).</p> <p>Please give rationale for the proposed alternative solution(s), including how these might better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification and Alternative Modification developed by the Group.</p>	No	
9	<p>Does P220 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure?</p> <p>Please give rationale.</p>	No	
10	Are there any further comments on P220 that you wish to make?	No	

## P220 Assessment Consultation Form

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## P220 Assessment Procedure Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular, views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	Gary Henderson
<b>Company Name:</b>	SAIC Ltd. (for and on behalf of ScottishPower)
<b>No. of BSC Parties Represented</b>	7
<b>Parties Represented</b>	ScottishPower Energy Management Ltd, ScottishPower Generation Ltd, ScottishPower Energy Retail Ltd, SP Transmission Ltd, SP Manweb plc, SP Distribution Ltd, CRE Energy Limited
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	0
<b>Non Parties represented</b>	N/A
<b>Role of Respondent</b>	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
<b>Does this response contain confidential information?</b>	No

Q	Question	Response	Rationale
1	Do you believe that Proposed Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?  Please give rationale stating relevant objective(s).	Neutral  Yes  Yes	Objective a) The Proposed Modification will have no impact on the Transmission Companies ability to discharge Objective (a)  Objective b) The Proposed Modification will have, in our opinion, a small benefit to the Transmission Company in the operation of the network by potentially improving market balancing and consequentially reducing the number of system balancing actions required by National Grid.  Objective c) The Proposed Modification will provide a small positive benefit to Parties (mainly smaller Parties), allowing them to simplify their data gathering processes and



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Q	Question	Response	Rationale
		No	<p>operate in a more efficient manner. Any increase in Party efficiency should result in a consequential increase in competition.</p> <p>Objective d) The Proposed Modification will not have a positive effect on Objective (d). The very large implementation costs will outway any positive benefits on the other Objectives.</p>
2	<p>Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification?</p> <p>Please give rationale stating relevant objective(s).</p>	<p>Neutral</p> <p>Yes</p> <p>Yes</p> <p>No</p>	<p>Objective a) The Alternative Modification will have no impact on the Transmission Companies ability to discharge Objective (a)</p> <p>Objective b) The Alternative Modification will have, in our opinion, a small benefit to the Transmission Company in the operation of the network by potentially improving market balancing and consequentially reducing the number of system balancing actions required by National Grid.</p> <p>Objective c) The Alternative Modification will provide a small positive benefit to Parties (mainly smaller Parties), allowing them to simplify their data gathering processes and operate in a more efficient manner. Any increase in Party efficiency should result in a consequential increase in competition.</p> <p>Objective d) The Alternative Modification will not have a positive effect on Objective (d). The very large implementation costs will outway any positive benefits on the other Objectives.</p>
3	<p>Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?</p> <p>Please give rationale stating relevant objective(s).</p>	<p>Neutral</p> <p>Yes</p>	<p>Objective a) This Modification will have no impact on the Transmission Companies ability to discharge Objective (a)</p> <p>Objective b) The Proposed Modification will have, in our opinion, a small benefit to the Transmission Company in the operation of the network by potentially improving market balancing and consequentially reducing the number</p>

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Q	Question	Response	Rationale
		<p>Yes</p> <p>No</p>	<p>of system balancing actions required by National Grid.</p> <p>Objective c) The Proposed Modification will provide a small positive benefit to Parties (mainly smaller Parties), allowing them to simplify their data gathering processes and operate in a more efficient manner. Any increase in Party efficiency should result in a consequential increase in competition.</p> <p>Objective d) The Proposed Modification will not have a positive effect on Objective (d). The very large implementation costs will outway any positive benefits on the other Objectives.</p>
4	<p>For each group of proposed new P220 BMRS data items listed in (a) to (g) below, please indicate in a reasonable level of detail how the provision of this information would or would not be of benefit to your organisation.</p> <p>For example, this might include details of any business processes in which you would use the new data, and how the new data might or might not:</p> <ul style="list-style-type: none"> <li>• Improve the efficiency of these processes;</li> <li>• Give the ability to make more informed commercial decisions; and/or</li> <li>• Improve self-balancing.</li> </ul> <p>Where possible, please tie the details provided back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.</p> <p>If able, participants are also invited to quantify any identified benefits and resulting cost savings.</p>	-	
	<p>a) Outturn and reference temperatures (Proposed and Alternative Modifications)</p>	-	

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Q	Question	Response	Rationale
	b) Wind generation forecast (Proposed and Alternative Modifications)	-	
	c) Instantaneous and half-hourly generation by fuel type, including 'real-time' total demand outturn and half-hourly Interconnector flows (Proposed and Alternative Modifications)	-	
	d) Daily energy volumes based on Transmission System Demand without trend data (Proposed Modification only)	-	
	e) Daily energy volumes based on Initial National Demand Out-Turn with trend data (Alternative Modification only)	-	
	f) Non-BM STOR Instructed Volumes (Proposed and Alternative Modifications)	-	
	g) 'Real-time' Transmission System Frequency (Alternative Modification only)	-	
5	<p>Do you support the inclusion in the P220 solution of a real-time 'data incomplete' flag for the generation by fuel type data (as described in Section 6.5 of the consultation document), given that this would significantly increase the Transmission Company's implementation costs and lead time?</p> <p>Please give rationale and, where possible, link these views to the Applicable BSC Objectives.</p> <p>If 'yes', please provide details of how the additional benefits of including this flag would outweigh the delay in implementation and increased costs (e.g. how the flag would enable you to gain additional value from the P220 data).</p>	No	
6	Do you believe that publication of any of the new BMRS data contained in the Proposed Modification or Alternative Modification		

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Q	Question	Response	Rationale
	could give rise to any confidentiality issues?  Please give rationale and state relevant data items. Where possible, please link these views back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.	No	
7	Do you support the Modification Group's initial recommendation that, if approved, P220 should be implemented in the November 2008 Release with a fall-back of the June 2009 Release? (note that, if the real-time 'data incomplete' flag was included in the solution, a November 2008 implementation would no longer be feasible).  Please give rationale.	Yes	The Modification should be implemented as soon as practically possible.
8	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? (please note that, whilst the Modification Group is unlikely to be able to consider the inclusion of further new data items under P220, respondents are still invited to identify any additional data requirements here which they believe should be considered separately to P220 in the future).  Please give rationale for the proposed alternative solution(s), including how these might better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification and Alternative Modification developed by the Group.	No	
9	Does P220 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure?  Please give rationale.	No	
10	Are there any further comments on P220 that you wish to make?	Yes	Although in principle the publication of more market data is a good one, we feel that the £750000 implementation costs make this

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Q	Question	Response	Rationale
			Modification uneconomical. We do not, therefore, support its implementation.

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## P220 Assessment Procedure Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular, views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	Carole Pitkeathley
<b>Company Name:</b>	energywatch
<b>No. of BSC Parties Represented</b>	None
<b>Parties Represented</b>	
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	1
<b>Non Parties represented</b>	1
<b>Role of Respondent</b>	other – statutory consumer watchdog body
<b>Does this response contain confidential information?</b>	No

Q	Question	Response	Rationale
1	<p>Do you believe that Proposed Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?</p> <p>Please give rationale stating relevant objective(s).</p>	Yes	<p>We believe that information transparency is a touchstone of open and effective competitive markets. In addition, and particularly in the electricity market, when demand-side participation can assist the system operator to balance the system on a more efficient and economic basis (BSC Objective b), allowing greater access to market data to demand-side participants can only be beneficial.</p> <p>We also believe that new entrants to the electricity market can benefit greatly from the increased availability, on an accessible public platform, of the data items which P220 seeks to publish. This would clearly meet Applicable Objective c, facilitating increased competition in generation and supply.</p> <p>When only some market participants have access to data, the</p>

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Q	Question	Response	Rationale
			<p>information asymmetry that results can damage the competitiveness of the electricity market and restrict the efficient and economic operation of the system by the system operator.</p> <p>We believe that the costs of implementing P220, so long as these are reasonable, would be outweighed by the benefits of providing this data on a wider basis. Early implementation of P220 alongside P219 would actually reduce overall implementation costs even further, enhancing the benefits.</p> <p>While we await more information on the benefits of P220 from respondents to this consultation, we do not consider that the benefits will be so low as to adversely impact the efficient operation of the trading arrangements (Objective d) as the majority of the mod group currently believe. It is noticeable that that view is mainly being put forward by large market players who would arguably benefit from an information 'barrier to entry' affecting small players or new entrants and may already access the data being sought under P220 through their own commercial arrangements. By denying more market players access on a public, simple to access platform such as the Low Grade Service, there is a real risk of perpetuating some of the current inefficiencies which destabilise market prices and increase volatility.</p> <p>Open and effective competitive markets rely on a level playing field in terms of available data which parties can then use to develop competitive advantage, innovation, etc. It is information asymmetry which hinders competition, ensuring that those with access can effectively create an information 'barrier to entry' for small and new players.</p> <p>Ofgem, in its impact assessment and decision letter regarding energywatch's gas modification UNC006, highlighted that there are real benefits from improved information transparency, not least in the case of more efficient system operation, sharper economic signals to market participants and long-term increased liquidity. While quantifying some of these benefits can be difficult, we</p>

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Q	Question	Response	Rationale
			<p>believe that increased granularity and frequency of data provided to a wide range of interested parties can develop a more level-playing field which will establish real quantitative benefits in due course. This should be the outcome for rational, open and competitive markets.</p> <p>We believe that consumers will ultimately benefit from reductions in the costs of system operation and increased competition and, therefore, P220 ought to be approved.</p>
2	<p>Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification?</p> <p>Please give rationale stating relevant objective(s).</p>	Yes	<p>The addition of a further data item will only enhance further the benefits which we have outlined above. So long as the costs of implementation are reasonable, there is no reason why the benefits of increased information transparency cannot easily outweigh those costs.</p>
3	<p>Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?</p> <p>Please give rationale stating relevant objective(s).</p>	Yes	<p>See our answer to question 1</p>
4	<p>For each group of proposed new P220 BMRS data items listed in (a) to (g) below, please indicate in a reasonable level of detail how the provision of this information would or would not be of benefit to your organisation.</p> <p>For example, this might include details of any business processes in which you would use the new data, and how the new data might or might not:</p> <ul style="list-style-type: none"> <li>• Improve the efficiency of these processes;</li> <li>• Give the ability to make more informed commercial decisions; and/or</li> <li>• Improve self-balancing.</li> </ul> <p>Where possible, please tie the details provided back to the</p>	-	



## P220 Assessment Consultation Form

Q	Question	Response	Rationale
	arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.  If able, participants are also invited to quantify any identified benefits and resulting cost savings.		
	a) Outturn and reference temperatures (Proposed and Alternative Modifications)	-	Although we would not use this data ourselves, surely as weather is a significant driver for available electricity supply and demand and the system operator balancing actions which may result, good quality data about temperatures, accessible to all market participants, is desirable?
	b) Wind generation forecast (Proposed and Alternative Modifications)	-	We would not use this data but the important role that wind generation may play in the electricity supply mix in the future is surely grounds for having good quality data accessible to the wider market?
	c) Instantaneous and half-hourly generation by fuel type, including 'real-time' total demand outturn and half-hourly Interconnector flows (Proposed and Alternative Modifications)	-	The availability of this data will also allow market participants to make judgements, on the supply and demand side, about their own commercial positions.
	d) Daily energy volumes based on Transmission System Demand without trend data (Proposed Modification only)	-	
	e) Daily energy volumes based on Initial National Demand Out-Turn with trend data (Alternative Modification only)	-	
	f) Non-BM STOR Instructed Volumes (Proposed and Alternative Modifications)	-	
	g) 'Real-time' Transmission System Frequency (Alternative Modification only)	-	
5	Do you support the inclusion in the P220 solution of a real-time 'data incomplete' flag for the generation by fuel type data (as	No	It does not appear, from the Transmission Company's analysis, that the failure to flag up some minor errors in data would

## P220 Assessment Consultation Form

Q	Question	Response	Rationale
	<p>described in Section 6.5 of the consultation document), given that this would significantly increase the Transmission Company's implementation costs and lead time?</p> <p>Please give rationale and, where possible, link these views to the Applicable BSC Objectives.</p> <p>If 'yes', please provide details of how the additional benefits of including this flag would outweigh the delay in implementation and increased costs (e.g. how the flag would enable you to gain additional value from the P220 data).</p>		<p>significantly reduce the value or usefulness of the data on generation by fuel type. There would have to be significant evidence of degradation of the usefulness of the data before a 'flag' should be deployed. It may be much less expensive to add this feature on at a later time.</p>
6	<p>Do you believe that publication of any of the new BMRS data contained in the Proposed Modification or Alternative Modification could give rise to any confidentiality issues?</p> <p>Please give rationale and state relevant data items. Where possible, please link these views back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.</p>	No	<p>It does not appear, from the descriptions provided of the data items to be published, that particular parties will be exposed through the provision of the data. We therefore do not believe that confidentiality of any particular party's commercial position will be compromised.</p>
7	<p>Do you support the Modification Group's initial recommendation that, if approved, P220 should be implemented in the November 2008 Release with a fall-back of the June 2009 Release? (note that, if the real-time 'data incomplete' flag was included in the solution, a November 2008 implementation would no longer be feasible).</p> <p>Please give rationale.</p>	Yes	<p>We believe that early implementation will save costs, allow the benefits of P220 to be available in winter 2008/09 (especially if there is a decision to implement alongside P219), and maximise the benefits of the publication of the data. Although the period between the submission of the final modification report to the Authority and the date by which an Authority decision is required for a proposed implementation in November 2008 is quite short, we would urge the Authority to try and meet this timescale to maximise the benefits of P220/P219 implementation.</p>

## P220 Assessment Consultation Form

Q	Question	Response	Rationale
8	<p>Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? (please note that, whilst the Modification Group is unlikely to be able to consider the inclusion of further new data items under P220, respondents are still invited to identify any additional data requirements here which they believe should be considered separately to P220 in the future).</p> <p>Please give rationale for the proposed alternative solution(s), including how these might better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification and Alternative Modification developed by the Group.</p>	No	
9	<p>Does P220 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure?</p> <p>Please give rationale.</p>	No	
10	<p>Are there any further comments on P220 that you wish to make?</p>	Yes	<p>Ofgem has argued recently that the pace of liberalisation of energy markets in Europe is the reason for high energy prices in GB. At the same time, Ofgem has emphasised the more liberal aspects of the GB energy markets. As information transparency is a key feature of open and effective competitive markets, it would be perverse for this modification to be stifled as it would go against the more open nature of the GB markets.</p> <p>We note that the P220 mod group is to consist of SSMG members with an invitation extended to DSWG members. However, the voting on the proposal appears to be exclusively by SSMG members who largely represent the 'Big 6' market players. Would it not have been fairer to temporarily provide DSWG attendees with membership of the mod group and voting powers? Otherwise the perception is given that the mod group recommendation may be skewed in favour of the views of some market players.</p>

## P220 Assessment Consultation Form

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## P220 Assessment Procedure Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular, views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	Ben Sheehy
<b>Company Name:</b>	E.ON UK plc
<b>No. of BSC Parties Represented</b>	5
<b>Parties Represented</b>	E.ON UK plc, Powergen Retail Limited, Citigen London Limited, Economy Power, Enfield Energy Centre
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	0
<b>Non Parties represented</b>	-
<b>Role of Respondent</b>	Supplier, Generator, Trader, Consolidator, Exemptable Generator
<b>Does this response contain confidential information?</b>	No.

Q	Question	Response	Rationale
1	Do you believe that Proposed Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?  Please give rationale stating relevant objective(s).	Yes	The principle is right: that better information on the BMRS furthers both market transparency and development. Although the tangible benefit of access to new data items is very difficult to quantify, we accept that the proposal would prove useful – providing implementation costs are reasonable. Objectives c) and d) would be bettered.
2	Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification?  Please give rationale stating relevant objective(s).	Yes	The alternative extends this principle.

## P220 Assessment Consultation Form

Q	Question	Response	Rationale
3	<p>Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?</p> <p>Please give rationale stating relevant objective(s).</p>	Yes	More information is made available at a cost that is not significantly higher.
4	<p>For each group of proposed new P220 BMRS data items listed in (a) to (g) below, please indicate in a reasonable level of detail how the provision of this information would or would not be of benefit to your organisation.</p> <p>For example, this might include details of any business processes in which you would use the new data, and how the new data might or might not:</p> <ul style="list-style-type: none"> <li>• Improve the efficiency of these processes;</li> <li>• Give the ability to make more informed commercial decisions; and/or</li> <li>• Improve self-balancing.</li> </ul> <p>Where possible, please tie the details provided back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.</p> <p>If able, participants are also invited to quantify any identified benefits and resulting cost savings.</p>	-	We judge that all of the data items listed below will have an intangible benefit by improving one of the tools (the BMRS) upon which operational generation decisions are made, with the exception of item c). Real time generation by fuel type with incomplete data will not provide a benefit.
	<p>a) Outturn and reference temperatures (Proposed and Alternative Modifications)</p>	-	-
	<p>b) Wind generation forecast (Proposed and Alternative Modifications)</p>	-	-

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Q	Question	Response	Rationale
	c) Instantaneous and half-hourly generation by fuel type, including 'real-time' total demand outturn and half-hourly Interconnector flows (Proposed and Alternative Modifications)	-	-
	d) Daily energy volumes based on Transmission System Demand without trend data (Proposed Modification only)	-	-
	e) Daily energy volumes based on Initial National Demand Out-Turn with trend data (Alternative Modification only)	-	-
	f) Non-BM STOR Instructed Volumes (Proposed and Alternative Modifications)	-	-
	g) 'Real-time' Transmission System Frequency (Alternative Modification only)	-	-
5	<p>Do you support the inclusion in the P220 solution of a real-time 'data incomplete' flag for the generation by fuel type data (as described in Section 6.5 of the consultation document), given that this would significantly increase the Transmission Company's implementation costs and lead time?</p> <p>Please give rationale and, where possible, link these views to the Applicable BSC Objectives.</p> <p>If 'yes', please provide details of how the additional benefits of including this flag would outweigh the delay in implementation and increased costs (e.g. how the flag would enable you to gain additional value from the P220 data).</p>	No	<p>We believe that the bar should be high for the imposition of additional balancing mechanism associated costs, as with most proposals it is very easy to accrue large bills on what is already a considerable overhead for the market. The likely cost of amending National Grid's systems is simply too much to pay for an intangible benefit.</p>

## P220 Assessment Consultation Form

Q	Question	Response	Rationale
6	<p>Do you believe that publication of any of the new BMRS data contained in the Proposed Modification or Alternative Modification could give rise to any confidentiality issues?</p> <p>Please give rationale and state relevant data items. Where possible, please link these views back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.</p>	No	-
7	<p>Do you support the Modification Group's initial recommendation that, if approved, P220 should be implemented in the November 2008 Release with a fall-back of the June 2009 Release? (note that, if the real-time 'data incomplete' flag was included in the solution, a November 2008 implementation would no longer be feasible).</p> <p>Please give rationale.</p>	Yes	-
8	<p>Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? (please note that, whilst the Modification Group is unlikely to be able to consider the inclusion of further new data items under P220, respondents are still invited to identify any additional data requirements here which they believe should be considered separately to P220 in the future).</p> <p>Please give rationale for the proposed alternative solution(s), including how these might better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification and Alternative Modification developed by the Group.</p>	No	-
9	<p>Does P220 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure?</p> <p>Please give rationale.</p>	No	-
10	Are there any further comments on P220 that you wish to make?	No	-



## P220 Assessment Consultation Form

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Please send your responses by **12:00 noon on Monday 21 January 2008** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email '**P220 Assessment Procedure Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Kathryn Coffin on 020 7380 4030, email address [kathryn.coffin@elexon.co.uk](mailto:kathryn.coffin@elexon.co.uk).



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17/01/08

Kathryn Coffin  
ELEXON Limited,  
4th Floor,  
350 Euston Road,  
London, NW1 3AW

Dear Kathryn

**P 220 – Provision of new data items for improving market information**

I am writing on behalf of the Major Energy Users' Council (meuc), which is an independent body representing the interests of some 200 large industrial, commercial, retail and public sector organisations for which the cost of electricity and gas is a significant factor in their operations.

I wish to state clearly from the start that meuc support the implementation of P 220.

One of the fundamental requirements of an open competitive market is the provision of information that will allow energy buyers to make informed decisions. Changes in the market have made the old arrangement of “sitting down once a year to agree a price” an expensive option. More and more, buyers are being expected to fix their prices far more frequently than annually. In order to do this, buyers must have easy access to the basic information that is driving the market.

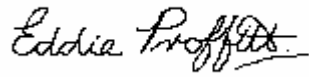
It is worth noting that only this week Ofgem's press statement following their meeting with the Chancellor contained the following as a reason for higher prices in the UK,  
*“We are feeling the effect of an opaque, non-liberalized market in the rest of the EU,” said Mr. Buchanan.* I would suggest that without the information proposed there is a degree of opacity in our own market.

Moving on to the detailed proposals I believe that the items suggested could all impact on the price of electricity. Changes in temperature from the norm can alter the anticipated demand, the level of wind generation will become increasingly important as its volume increases and the information on the source of generation will help consumers to understand price setting.

On the question of cost/benefit analysis I can understand the concern over the cost of implementation. I do however believe passionately that for a competitive market to work it is necessary to be open and transparent, the provision of such information being as important any other support systems. I would question whether the cost indicated should be considered as new additional cost or as part of system maintenance and development for which allowance is already made in the price control. It is interesting that National Grid Gas has recently totally upgraded the Daily Gas Summary without any mention of the cost involved.

The financial benefit to consumers is impossible to quantify although I believe it will be substantial, it requires only a fraction of a percent saving on their energy bill to recover any increase in transmission cost that implementation could cause. As the sole source of revenue in the energy industry I understand that any cost will ultimately have to be borne by the consumer if it is passed through, however I believe in this case that the change proposed in P 220 should be implemented.

Yours truly,

A handwritten signature in black ink that reads "Eddie Proffitt". The signature is written in a cursive style with a horizontal line at the end.

Eddie Proffitt

## P220 Assessment Procedure Consultation Questions

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views, or to provide any further evidence on any of the matters contained within this document. In particular, views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	Gareth Davies
<b>Company Name:</b>	Chemical Industries Association
<b>No. of BSC Parties Represented</b>	None
<b>Parties Represented</b>	Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	
<b>Non Parties represented</b>	Please list all non Parties responding on behalf of (including the respondent company if relevant).
<b>Role of Respondent</b>	other – Trade Association
<b>Does this response contain confidential information?</b>	No

Q	Question	Response	Rationale
1	<p>Do you believe that Proposed Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?</p> <p>Please give rationale stating relevant objective(s).</p>	Yes	<p>Under the current Code baseline there is a great deal of information available on numerous platforms, however not all of our members (end-users) have the time and resource to filter through and use this information effectively. Therefore commercial decisions are made on less informed information, promoting the possibility of additional demand constraints on the system and therefore leading to greater balancing actions by the GB Transmission System.</p> <p>Access to the increased information as proposed under P220 in a clearer and more useful format will allow our members (and other parties) to better understand the functioning of the market and therefore make more informed commercial decisions. It will aid self-balancing reducing the amount of balancing required by the</p>

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Q	Question	Response	Rationale
			<p>Transmission Company. We also believe that the proposed modification would help promote competition as new entrants (who may not have the resource of larger market players) will be able to assess increased information promoting a "level playing field" aiding commercial decisions.</p> <p>The CIA believes the proposed modification P220 will better achieve the applicable BSC Objectives when compared with the current Code baseline.</p>
2	<p>Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification?</p> <p>Please give rationale stating relevant objective(s).</p>	Yes	<p><i>Applicable BSC Objective (a) – The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission License.</i></p> <p>The CIA cannot see any impact on objective (a)</p> <p><i>Applicable BSC Objective (b) – The efficient, economic and co-ordinated operation of the GB Transmission System</i></p> <p>Transparent information is important to the effective functioning and balancing of an electricity market. Increased information transparency will allow market participants to have a greater understanding of the market, helping to increase the efficiency of self-balancing and therefore aiding the Transmission System.</p> <p><i>Applicable BSC 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.</i></p> <p>Transparent information is important to the effective functioning of a competitive electricity market. Increased information transparency will allow market participants (who currently do not have adequate resources to analyse current information provisions) to have a greater understanding of the market, allowing better informed commercial decisions and promoting competition further. The increased information proposed in this mod will promote a "level playing field" aiding new entrants who do not have the resource of larger market players.</p> <p><i>Applicable BSC Objective (d) – Promoting efficiency in the implementation</i></p>

## P220 Assessment Consultation Form

Q	Question	Response	Rationale
			<p><i>and administration of the balancing and settlement arrangements.</i></p> <p>Access to the increased information as proposed under P220 in a clearer and more useful format will allow our members (and other parties) to better understand the functioning of the market and therefore make more informed commercial decisions. It will aid self-balancing and therefore directly promotes the efficiency in the implementation of the balancing and settlement arrangements.</p> <p>The CIA does not believe that the costs associated with implementing this modification will outweigh the benefits.</p>
3	<p>Do you believe that Alternative Modification P220 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current Code baseline?</p> <p>Please give rationale stating relevant objective(s).</p>	Yes	<p>The alternative Modification P220 includes additional data feeds, which again (see answer Q1) will better achieve the applicable BSC Objectives when compared with the current Code baseline.</p>
4	<p>For each group of proposed new P220 BMRS data items listed in (a) to (g) below, please indicate in a reasonable level of detail how the provision of this information would or would not be of benefit to your organisation.</p> <p>For example, this might include details of any business processes in which you would use the new data, and how the new data might or might not:</p> <ul style="list-style-type: none"> <li>• Improve the efficiency of these processes;</li> <li>• Give the ability to make more informed commercial decisions; and/or</li> <li>• Improve self-balancing.</li> </ul> <p>Where possible, please tie the details provided back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.</p> <p>If able, participants are also invited to quantify any identified benefits and resulting cost savings.</p>	-	

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Q	Question	Response	Rationale
	a) Outturn and reference temperatures (Proposed and Alternative Modifications)	-	This is important information to enable end users to assess the level of forecast electricity demand (and to then assess how this demand may be met). Taking the gas market as a parallel, this information is already provided through National Grid's information exchange and is used frequently by end users.
	b) Wind generation forecast (Proposed and Alternative Modifications)	-	As wind generation continues to increase further the rate of output may add pressure to electricity prices (as witnessed in Germany) the CIA believes this information would be valuable and again help better inform parties in the market.
	c) Instantaneous and half-hourly generation by fuel type, including 'real-time' total demand outturn and half-hourly Interconnector flows (Proposed and Alternative Modifications)	-	The breakdown of generation outturn by fuel type will promote better understanding of the market and therefore will enable more informed commercial decisions. This is a particular area where data already exists on public sites to enable this information to be derived <b>but is simply beyond the limit of resources of all but a few very well resourced major market players.</b>
	d) Daily energy volumes based on Transmission System Demand without trend data (Proposed Modification only)	-	
	e) Daily energy volumes based on Initial National Demand Out-Turn with trend data (Alternative Modification only)	-	Forecast data is key to making an assessment of how supply may be achieved within the market.
	f) Non-BM STOR Instructed Volumes (Proposed and Alternative Modifications)	-	
	g) 'Real-time' Transmission System Frequency (Alternative Modification only)	-	
5	Do you support the inclusion in the P220 solution of a real-time 'data incomplete' flag for the generation by fuel type data (as described in Section 6.5 of the consultation document), given that this would significantly increase the Transmission Company's implementation costs and lead time?	No	Although accurate data is favourable the CIA believes the benefits of having this information as soon as possible outweighs the low likelihood of having incorrect reported data. We do not see once implemented why further upgrades cannot be made at a later date that may take into account a 'data incomplete' flag.

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Q	Question	Response	Rationale
	<p>Please give rationale and, where possible, link these views to the Applicable BSC Objectives.</p> <p>If 'yes', please provide details of how the additional benefits of including this flag would outweigh the delay in implementation and increased costs (e.g. how the flag would enable you to gain additional value from the P220 data).</p>		
6	<p>Do you believe that publication of any of the new BMRS data contained in the Proposed Modification or Alternative Modification could give rise to any confidentiality issues?</p> <p>Please give rationale and state relevant data items. Where possible, please link these views back to the arguments expressed in respect of the Applicable BSC Objectives under Qs 1-3 above.</p>	No	We do not foresee any confidentiality issues that would arise from the implementation of this modification.
7	<p>Do you support the Modification Group's initial recommendation that, if approved, P220 should be implemented in the November 2008 Release with a fall-back of the June 2009 Release? (note that, if the real-time 'data incomplete' flag was included in the solution, a November 2008 implementation would no longer be feasible).</p> <p>Please give rationale.</p>	Yes	The implementation of increased information is essential for the improved commercial decisions that our members will be able to take. With increasing complexity and volatility in the electricity market due to EUETS & LCPD (as examples) the earliest possible implementation is a must. We therefore believe that the new data feeds must be released by the 6th November 2008 even if further upgrades are then required. We urge the authority to meet the tight timescales involved so the full benefits of implementation can be found as early as possible.



## P220 Assessment Consultation Form

Q	Question	Response	Rationale
8	<p>Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? (please note that, whilst the Modification Group is unlikely to be able to consider the inclusion of further new data items under P220, respondents are still invited to identify any additional data requirements here which they believe should be considered separately to P220 in the future).</p> <p>Please give rationale for the proposed alternative solution(s), including how these might better facilitate the achievement of the Applicable BSC Objectives when compared with the Proposed Modification and Alternative Modification developed by the Group.</p>	No	
9	<p>Does P220 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure?</p> <p>Please give rationale.</p>	No	We do not see any issues that would delay the implementation of this modification further.
10	Are there any further comments on P220 that you wish to make?	Yes	<p>We note that the majority of the modification group (mainly large market players) agree that this modification proposes benefits to both applicable BSC Objectives (b) and (c) however, there is a belief that the benefits are outweighed by the cost. As a result, smaller players (new entrants/ end-users) have been asked to provide a cost-benefit analysis. It is very difficult to assess this, as was noted by our members when asked for justification for the gas modification UNC006. However the lack of cost-benefit analysis should not be a reason to block this modification.</p> <p>This modification is proposing to increase electricity information available to the market in a clear and transparent manner, bringing electricity generally in line with gas. At the time of decision for increased gas information there was opposition by large users stating that the costs outweighed the benefits. Although there was a lack of cost-based analysis Ofgem implemented the modification</p>

## P220 Assessment Consultation Form

Q	Question	Response	Rationale
			<p>noting that increased information would aid the efficiency of the market. This decision has now been backed up, with a large number of market participants assessing this information daily.</p> <p>At a time when we are lobbying for liberalisation across Europe and increased information provision (with the UK showing the lead) it would seem a backward step to a) Not show the willingness to promote a "level playing field" for all market participants &amp; b) take direction from the lessons learnt when accessing the need for increased gas information through UNC006.</p> <p>Although we have indicated earlier in the response that it is hard to make a cost based assessment – fundamentally, improved information will lead to a more efficient market – and that should mean lower prices. An assumed saving of only £0.5/MWhour through the implementation of this modification would lead to savings of approximately £7.5million for the chemical sector alone* a vast difference to the £140,000 implementation costs.</p> <p><i>*Total annual consumption by the Chemical Sector during 2005 as reported by DUKES (Digest of United Kingdom Energy Statistics) as published by the DTI (Department for Trade and Industry).</i></p>

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