

ASSESSMENT REPORT for Modification Proposal P169 'Publication of BMU names on ELEXON website'

Prepared by: P169 Modification Group

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RECOMMENDATIONS

The P169 Modification Group invites the Panel to;

- **AGREE that the Alternative Modification P169 should be made;**
- **AGREE that the Proposed Modification P169 should not be made;**
- **AGREE a provisional Implementation Date for the Alternative Modification P169 of 10 Working Days after an Authority decision;**
- **AGREE a provisional Implementation Date for the Proposed Modification P169 of 10 Working Days after an Authority decision;**
- **AGREE that Modification Proposal P169 be submitted to the Report Phase; and**
- **AGREE that the draft Modification Report be issued for consultation and submitted to the Panel Meeting of 11 November 2004.**

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¹ The current version of the Balancing and Settlement Code (the 'Code') can be found at [ELEXON - Balancing and Settlement Code \(BSC\) – Live Version](#)

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SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

As far as the P169 Modification Group has been able to assess, the following parties/documents would be impacted by the implementation of Modification Proposal P169.

Parties	Sections of the BSC	Code	Subsidiary Documents	
Suppliers	A	<input type="checkbox"/>	BSC Procedures	<input type="checkbox"/>
Generators	B	<input type="checkbox"/>	Codes of Practice	<input type="checkbox"/>
Licence Exemptable Generators	C	<input type="checkbox"/>	BSC Service Descriptions	<input type="checkbox"/>
Transmission Company	D	<input type="checkbox"/>	Service Lines	<input type="checkbox"/>
Interconnector	E	<input type="checkbox"/>	Data Catalogues	<input type="checkbox"/>
Distribution System Operators	F	<input type="checkbox"/>	Communication Requirements Documents	<input type="checkbox"/>
Party Agents				
Data Aggregators	G	<input type="checkbox"/>	Reporting Catalogue	<input checked="" type="checkbox"/>
Data Collectors	H	<input type="checkbox"/>	MIDS	<input type="checkbox"/>
Meter Operator Agents	J	<input type="checkbox"/>	Core Industry Documents	
ECVNA	K	<input type="checkbox"/>	Grid Code	<input type="checkbox"/>
MVRNA	L	<input type="checkbox"/>	Supplemental Agreements	<input type="checkbox"/>
BSC Agents				
SAA	M	<input type="checkbox"/>	Ancillary Services Agreements	<input type="checkbox"/>
FAA	N	<input type="checkbox"/>	Master Registration Agreement	<input type="checkbox"/>
BMRA	O	<input type="checkbox"/>	Data Transfer Services Agreement	<input type="checkbox"/>
ECVAA	P	<input type="checkbox"/>	British Grid Systems Agreement	<input type="checkbox"/>
CDCA	Q	<input type="checkbox"/>	Use of Interconnector Agreement	<input type="checkbox"/>
TAA	R	<input type="checkbox"/>	Settlement Agreement for Scotland	<input type="checkbox"/>
CRA	S	<input type="checkbox"/>	Distribution Codes	<input type="checkbox"/>
Teleswitch Agent	T	<input type="checkbox"/>	Distribution Use of System Agreements	<input type="checkbox"/>
SVAA	U	<input type="checkbox"/>	Distribution Connection Agreements	<input type="checkbox"/>
BSC Auditor	V	<input checked="" type="checkbox"/>	BSCCo	
Profile Administrator	W	<input type="checkbox"/>	Internal Working Procedures	<input checked="" type="checkbox"/>
Certification Agent	X	<input type="checkbox"/>	Other Documents	
MIDP			Transmission Licence	<input type="checkbox"/>
Other Agents				
SMRA				
Data Transmission Provider				

*P169 requires no changes to any systems or processes used by Parties. However, P169 impacts Parties to the extent that the names of their BM Units (Proposed Modification P169) and wider BM Unit registration data (Alternative Modification P169) would be made available to all interested parties via the BSC Website. Publication of this data may also aid Parties in carrying out certain activities, such as undertaking market analysis and monitoring their own data.

1 DESCRIPTION OF PROPOSED MODIFICATION AND ASSESSMENT AGAINST THE APPLICABLE BSC OBJECTIVES

1.1 Modification Proposal

1.1.1 Aim of Modification Proposal

Modification Proposal P169 'Publication of BMU names on ELEXON website' ('P169') was raised by SmartestEnergy Ltd ('the Proposer') on 27 July 2004.

P169 proposes that all BM Unit names be published on the BSC (ELEXON) Website alongside their identification numbers (IDs). The Proposer notes that BM Unit IDs and Party names and IDs are already published on the website, and argues that additionally making BM Unit names available would aid market analysis – furthering the openness and transparency of the electricity market.

The Proposer therefore believes that P169 would better facilitate 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'.

Publication of BM Unit names on the BSC Website requires a Modification Proposal, since such data falls within the category of Confidential Information under the Balancing and Settlement Code ('the Code').

1.1.2 Code's existing definition of Confidential Information

Annex X-1 of the Code defines Confidential Information as being:

'in relation to a Party, all data, documents and other information supplied to that Party, that Party's Party Agent or any nominee of that Party by or on behalf of another Party (or Party Agent) or by or on behalf of the Panel, any Panel Committee, any Modification Group, a BSC Agent or a Market Index Data Provider under or pursuant to the provisions of the Code or any Code Subsidiary Document and, additionally, where the Party is a Supplier who was also a Distribution System Operator [...] any data and other information which is held in respect of a Customer and which was previously acquired by that Supplier acting in its capacity as such a Distribution System Operator'.

BSCCo is included as a Party for the purposes of the above definition. Since BM Unit names are issued to BSCCo by the Central Registration Agent (CRA), this data therefore constitutes Confidential Information for the purposes of the Code.

1.1.3 Code's existing rules regarding Disclosure of Confidential Information

Section H4.2 prohibits Disclosure of Confidential Information, except where it falls within an exception described in H4.2.3 or where its Disclosure is expressly permitted within another part of the Code (for instance, in Section V 'Reporting'). This obligation applies to each BSC Party (including BSCCo), who are defined as Restricted Parties for such purposes.

H4.2.3 allows Confidential Information to be Disclosed by a Restricted Party to the Authority, or in the following circumstances:

- The Restricted Party is permitted to Disclose the Confidential Information under the terms of a Nominated Agreement, or to comply with any Relevant Instrument or Legal Requirement;
- The Restricted Party believes, on reasonable grounds, that market arrangements set out or contemplated by the Code require or permit it to Disclose the Confidential Information;

- The person to whose affairs the Confidential Information relates gives prior written consent to the Disclosure;
- The Confidential Information is already in the public domain; or
- The person to whom the Confidential Information is Disclosed is an Affiliate of the Restricted Party.

However, Confidential Information which a Restricted Party is permitted or obliged to Disclose under H4.2.3 does not cease to be regarded as Confidential Information by virtue of such Disclosure – and therefore may not be further Disclosed by the recipient. Disclosure of BM Unit names by BSCCo using the BSC Website would therefore not qualify as an exception under H4.2.3.

Under Section B3 of the Code, the BSC Panel ('the Panel') also has a restricted ability to Disclose data. However, this Section prohibits the Panel from Disclosing any Trading Data unless this is expressly provided for by Section V.

Section V states that 'where data is or may be published pursuant to this Section V, such data shall not be regarded as Confidential Information for the purposes of H4.2' (V1.3.1(b)). Examples of BM Unit information which Section V permits to be published on the BSC Website include Credit Assessment Load Factor (CALF) values and BM Unit IDs.

Section V does not provide for BM Unit names to be Disclosed by BSCCo. Currently, individual BSC Parties receive the BM Unit names for their own BM Units (or, where a Party is part of a Trading Unit, for all BM Units in that Trading Unit) via the CRA-I014 flow. However, Parties' wishing to receive other Parties' CRA-I014 flows can only do so by submitting a report request to BSCCo under BSCP41 'Report Requests and Authorisations', and obtaining the consent of the other Party in accordance with H4.2.3.

A modification to the Code is therefore required before BM Unit names can be published by BSCCo on the BSC Website.

1.1.4 Process followed to date

The P169 Initial Written Assessment (IWA, Reference 1) was presented at the Panel Meeting held on 12 August 2004, where the Panel determined that P169 should be submitted to a two-month Assessment Procedure by a new Modification Group composed of members of the Governance, Settlement and Volume Allocation Standing Modification Groups. The issues raised by BSCCo and the Panel during the Initial Assessment of P169 formed the basis of the Terms of Reference for the P169 Modification Group (P169 MG), and can be found in Annex 2 along with details of the Group's membership.

The P169 MG met twice to consider P169, on 16 August and 22 September 2004, and a summary of the Group's discussions and recommendations is provided in Sections 1.2-1.7. An industry consultation was issued by the Group on 20 August 2004 (Reference 2). However, following BETTA Go-Active on 1 September, an extension was granted to the consultation period in order to allow participants to evaluate the Proposal in the context of the wider GB arrangements. The P169 Assessment Consultation document was therefore reissued on 2 September 2004 to all interested GB parties (Reference 3), including those Scottish participants who became BSC Parties with effect from 1 September. A summary of the responses received to the P169 Assessment Consultation can be found in Section 6, with the full responses attached as Annex 3.

The P169 MG also commissioned impact assessments from BSCCo and the Transmission Company, and summaries of the impacts returned can be found in Sections 4 and 5. A copy of the Transmission Company's analysis is attached as Annex 4.

Draft legal text has been provided for both the Proposed and Alternative Modifications, and is attached as Annex 1.

1.1.5 Interaction with Modification Proposal P168

Modification Proposal P168 'Publication of BMU GC and DC values on ELEXON website' ('P168') was also raised by SmartestEnergy Ltd on 27 July 2004, and proposes that Generation Capacity (GC) and Demand Capacity (DC) values be published on the BSC Website for all live BM Units. Since the defects identified by P168 and P169 are similar, the Panel agreed that the two Proposals should be considered by the same Modification Group.

The Panel initially determined that the Proposals should be progressed separately under a one-month Assessment Procedure for P168 and a two-month Assessment Procedure for P169. The Panel requested that the P168 discussions focus only on developing the solution for publishing GC and DC values, with any broader issues relating to Confidential Information or data publication to be considered under P169.

At its meeting of 2 September 2004, the Panel subsequently extended the P168 Assessment timetable by one month in order to undertake a GB-wide consultation. Please note that, although the two Proposals were still progressed separately by the Modification Group, the Group expressed a preference for the Alternative Modification P169 which would negate the need for P168. More information can be found in Section 1.7 below.

The P168 Assessment Report (Reference 4) will also be presented to the Panel at its meeting of 14 October 2004.

1.2 Proposed Modification

The P169 MG agreed that, under the Proposed Modification P169, BM Unit names should be published as part of the existing 'Registered BMU' spreadsheet within the Central Registration Service (CRS) Registration Data section of the BSC Website. The Group agreed that this spreadsheet should continue to be updated on its current weekly basis.

The Group's rationale in developing this solution is summarised in Section 1.3 below.

1.3 Issues raised by the Proposed Modification

1.3.1 Format and frequency of publication

The P169 MG noted that BM Unit names had never been published under NETA, and would therefore represent new information for industry.

The Group noted that the intention of P169 was to publish BM Unit names alongside the BM Unit IDs already available on the BSC Website, but that the Modification Proposal did not prescribe the format and frequency of publication. However, the Group noted that BM Unit IDs are currently published by BSCCo on a weekly basis as part of the 'Registered BMU' spreadsheet within the CRS Registration Data section of the website. The Group therefore suggested that BM Unit names be added to this existing spreadsheet under P169.² The Group also considered that, since P168 proposes to include GC and DC values within the same spreadsheet, this solution would mean that all the data would be available in one place if both P168 and the Proposed Modification P169 were approved – and would also enable implementation costs to be shared if the two Modifications were delivered together. The Proposer's Representative clarified that they were happy with this solution.

² The existing 'Registered BMU' spreadsheet is published by BSCCo every Monday, and contains the previous Friday's data. The spreadsheet currently provides Party names and Party IDs against each BM Unit ID.

The P169 MG therefore agreed that BM Unit names should be published within the existing 'Registered BMU' spreadsheet on the BSC Website, and that this should continue to be updated on a weekly basis. The Group noted that BSCCo receives BM Unit names from the CRA as part of the CRA-I020 flow (Operations Registration Report) sent to ELEXON's Trading Operations Market Analysis System (TOMAS) – and that this data would therefore need to be extracted from TOMAS before it could be published on the website.

1.3.2 Consideration of GB-wide arrangements following BETTA Go-Active

The P169 MG did not believe there to be any additional GB issues, arising from the extension of the England and Wales trading arrangements to Scotland under BETTA, which should be considered in the context of the Proposed Modification P169. The Group noted that no such issues had been identified by respondents to the P169 GB-wide Assessment Consultation (see Section 6 below).

1.3.3 Consideration of draft legal text

The P169 MG reviewed the legal drafting for the Proposed Modification P169 and agreed that the proposed text addressed the issue identified by the Modification Proposal.

1.4 Assessment of how the Proposed Modification would better facilitate the Applicable BSC Objectives

The majority view of the P169 MG is that P169 would better facilitate the achievement of Applicable BSC Objective (c).

- The majority of the Group agreed that publication of BM Unit names would promote the transparency of the market and thereby facilitate competition.
- However, one member of the Group stated that they were unconvinced that publication of BM Unit names would better facilitate competition, since it was not clear how the data would be used by participants.

The following represents a summary of the Group's rationale for this view.

Principle of market transparency

The P169 MG agreed that it did not believe there to be any reason why BM Unit names needed to be Confidential Information under the Code – particularly given that BM Unit IDs are already available on the BSC Website. The Group did not identify any loss to the owners of BM Units which would result from the publication of their BM Unit names.

Some members of the Group suggested that larger Parties or those with a longer history of market participation may already be able to work out BM Unit names using existing available data, such as BM Unit IDs or NGC's Seven Year Statement. Some members considered that non-publication of BM Unit names therefore potentially discriminated against small Parties or new entrants, since these would not necessarily have the resources or knowledge required to undertake such analysis. These members argued that it was in the interest of a fully transparent and competitive market for such information to be made available to all participants.

However, an attendee stated their view that making data available only aids transparency to the extent that the data is useful to industry.

Usefulness of data

The P169 MG therefore considered the potential uses of BM Unit names.

Some members of the Group suggested that publication of BM Unit names would help participants with market-modelling activities, and might be particularly useful to small players or new entrants seeking to better understand the market. Other members noted that publication of this data would enable directly-connected Customers to establish which site they are connected to, since ELEXON is unable to provide such information under the Code's existing confidentiality provisions.

The P169 MG noted that the usefulness of BM Unit names would depend upon the individual names chosen by the Lead Parties under BSCP15 'BM Unit Registration'. The Group noted BSCCo's advice that some BM Unit names currently contain the names of individual generating plant, whilst others are simply a repetition of the BM Unit ID.

Industry support for publication

In order to provide more detail in support of these views, the P169 MG agreed that the P169 Assessment Consultation should seek to identify whether participants believe publication of BM Unit names to be useful and the activities in which this data would be used. The Group also agreed to seek the views of small players and new entrants as to whether the current non-publication of BM Unit names represents a barrier to participation in the market.

Although the majority of respondents to the Assessment Consultation did not believe non-publication of BM Unit names to be a barrier to participation in the market, the majority of respondents did believe non-publication of this data to be a barrier to market transparency – and therefore agreed that the Proposed Modification P169 would better facilitate Applicable BSC Objective (c). Respondents to the consultation argued that publication of BM Unit names would aid market analysis and help Parties monitor their own data. More detail regarding the responses can be found in Section 6.

Having considered the Assessment Consultation responses, the majority of the P169 MG agreed that the Proposed Modification would better facilitate the achievement of Applicable BSC Objective (c).

1.5 Alternative Modification

During the Assessment Procedure for P169, the P169 MG also developed an Alternative Modification whereby the registration data for all live BM Units contained in the CRA-I020 flow would be published on the BSC Website. This data would include both BM Unit names and GC/DC values.

The P169 MG agreed that this data would be published as part of the existing 'Registered BMU' spreadsheet within the CRS Registration Data section of the BSC Website. The Group agreed that this spreadsheet should continue to be updated on its current weekly basis.

The P169 MG agreed that the Alternative Modification addressed the defect identified by the Modification Proposal, and noted that it would also negate the need for P168.

The Group's rationale in developing the Alternative Modification P169 is summarised in Section 1.6 below.

1.6 Issues raised by the Alternative Modification

1.6.1 Contents of CRA-I020 flow and scope of Alternative Modification

The P169 MG considered BSCCo's suggestion within the P169 IWA that a potential Alternative Modification could be to make the wider contents of the CRA-I020 data flow available on the BSC Website. The CRA-I020 is received by BSCCo using TOMAS, and includes other BM Unit registration data in addition to BM Unit names.

In August 2003 an expert group was convened by ELEXON to establish reporting requirements for registration data. In its report to the Imbalance Settlement Group (ISG – see ISG Paper 33/370,

Reference 3), this expert group supported making all BM Unit registration data available by allowing Parties to receive the full contents of the CRA-I020 data flow for every BM Unit on request. The group noted that this would require a Modification Proposal, since the contents of the flow are currently Confidential Information under the Code.

The P169 MG examined the content of the CRA-I020 flow, as outlined in Section 5.2 of the Reporting Catalogue.³ The Group requested that BSCCo provide legal advice as to whether publication of this data on the BSC Website could form a valid Alternative Modification for P169.

BSCCo noted that the defect identified by the Modification Proposal refers to publication of 'BM Unit data', and therefore advised that its legal view was that only the 'BM Unit registration' section of the I020 (listed as 5.2.1(c) in the Reporting Catalogue) could constitute an Alternative Modification in respect of P169.

The P169 MG noted that publication of the 'BM Unit registration' section of the CRA-I020 flow would provide industry with the following data in respect of each BM Unit:

- BM Unit ID;
- BM Unit name;
- BM Unit type;
- NGC BM Unit name;
- Lead Party ID;
- GSP Group ID;
- GSP Group name;
- Trading Unit name;
- Generation Capacity (MW);
- Demand Capacity (MW);
- Production/Consumption flag;
- Production/Consumption status;
- Transmission Loss Factor;
- Credit Assessment Load Factor;
- BM Unit Credit Assessment Import Capability (BMCAIC);
- BM Unit Credit Assessment Export Capability (BMCAEC);
- Exempt Export flag;
- Base Trading Unit flag;
- Final Physical Notification flag;
- Interconnector ID; and
- Effective From Date.⁴

The Group agreed that such a potential Alternative would address the issue identified by P169. The Group therefore agreed to seek industry views via consultation as to whether the Alternative would better facilitate the Applicable BSC Objectives when compared with the Proposed Modification.

For a summary of the consultation responses, please refer to Section 6. The Group's recommendation regarding the Alternative Modification can be found in Section 1.4 below.

The P169 MG also noted BSCCo's advice that the 'effective from' date would not necessarily show the original registration date of the BM Unit, since this field is used by the CRA to record the date on which the set of data for that BM Unit was last updated. The Group noted that this was not a reason not to

³ Please refer to Annex 6 for an extract from the Reporting Catalogue outlining the full contents of this flow.

⁴ The P169 MG initially considered including the 'effective to' date as a data item to be published under the Alternative Modification. However, following its discussion of the consultation responses, the Group agreed not to include this item since it would always appear as a blank field for live BM Units (see Section 6.2).

publish this field, but that its use should be clarified to participants. BSCCo agreed to include some explanatory text on the BSC Website should the Alternative Modification be approved.

1.6.2 Format and frequency of publication

The P169 MG considered what the format and frequency of publication should be under the Alternative Modification. The Group agreed that BM Unit registration data should be added to the existing 'Registered BMU' spreadsheet, so that it could be viewed against the BM Unit IDs, Party names and Party IDs already published within this document. The Group agreed that this would enable all BM Unit registration data to be viewed in one easily-accessible format. The Group also agreed that the 'Registered BMU' spreadsheet should continue to be updated weekly under the Alternative Modification.

1.6.3 Consideration of GB-wide arrangements following BETTA Go-Active

The P169 MG did not believe there to be any additional GB issues, arising from the extension of the England and Wales trading arrangements to Scotland under BETTA, which should be considered in the context of the Alternative Modification P169. The Group noted that no such issues had been identified by respondents to the P169 GB-wide Assessment Consultation (see Section 6 below).

1.6.4 Consideration of draft legal text

The P169 MG reviewed the legal drafting for the Alternative Modification P169 and agreed that the proposed text addressed the issue identified by the Modification Proposal.

One member of the Group queried why the text did not include a list of the individual data items to be published under the Alternative. BSCCo clarified that normal practice is to reference the broad content of a report in the Code, along with its format and frequency of publication, whilst listing the actual data items within the Reporting Catalogue. The Group noted that the Code's existing reference in Table V-4 to the Operations Registration Report (from which BSCCo would extract the BM Unit registration data under the Alternative Modification) does not contain a list of its individual data items, which are outlined in the Reporting Catalogue.

The P169 MG therefore agreed that the legal text for the Alternative Modification should refer broadly to publication of that BM Unit registration data which is obtained by BSCCo using the Operations Registration Report. The Group agreed that the individual data items should be listed in the Reporting Catalogue.

The P169 MG also noted BSCCo's advice that this approach would avoid the need to separately define some data items within the Code, since not all of these are already Code-Defined Terms. The Group also noted that the data items represent system labels, and therefore do not necessarily relate easily to Code processes.

The P169 MG requested a minor change to the draft legal text for the Alternative Modification P169, in order to clarify that the BM Unit registration data was obtained from the Operations Registration Report. This change was incorporated by BSCCo.

1.7 Assessment of how the Alternative Modification would better facilitate the Applicable BSC Objectives

The unanimous view of the P169 MG is that the Alternative Modification P169 should be made.

- The Group agreed that the Alternative Modification would better facilitate Applicable BSC Objective (c), when compared with the Proposed Modification and the current Code baseline, since publication of a wider set of BM Unit data would go further towards achieving a fully transparent market and would thereby better facilitate competition.

The following represents a summary of the Group's rationale in recommending that the Alternative Modification P169 should be made.

Potential cost-benefits of Alternative Modification

The P169 MG noted that the Alternative Modification could avoid the costs of any future Modification Proposal(s) being raised in order to Disclose additional BM Unit data, and would also remove the need to implement P168.

Principle of market transparency

The P169 MG agreed that they did not believe there to be any reason why the BM Unit registration data contained in the CRA-I020 flow needed to remain Confidential Information under the Code, and noted that this matched the view of the recent expert group report to the ISG. The Group agreed that it was in the interest of a fully transparent and competitive market for such information to be made available to all participants. The Group did not identify any loss to the owner of BM Units which would result from publication of their BM Unit registration data.

The Group also noted that some of the data concerned – such as CALF values and NGC BM Unit names – are already published elsewhere, and that more commercially-sensitive information is also available to Parties through Settlement reports such as the SAA-I014 data flow. In addition, some members suggested that larger Parties or those with a longer history of market participation may already be able to work out the remaining data using existing information such as the SAA-I014 or NGC's Seven Year Statement. The Group considered that non-publication of wider BM Unit registration data therefore potentially discriminated against small Parties or new entrants, since these would not necessarily have the resources or knowledge to locate or derive such data via other means.

An attendee stated their view that the Alternative Modification would aid competition simply by making more data available, and thereby improving transparency. However, another attendee believed that making data available only aids transparency to the extent that this data is useful to industry – and was concerned about the potential for swamping the market with data for which there was not a demand.

Usefulness of data

The P169 MG therefore considered the potential uses of wider BM Unit registration data by participants.

An attendee argued that the contents of the CRA-I020 represented the 'missing link' which would enable participants to draw together and make sense of other existing market data. One member of the Group stated that they believed publication of NGC BM Unit names and (ELEXON) BM Unit names in the same place would be useful to industry, since Parties are frequently required to enter these details on forms for their own BM Units.

However, the P169 MG agreed that it required more information from industry as to how such data would be used before it was able to assess whether its publication would better facilitate competition. The Group therefore agreed that the P169 Assessment Consultation should seek to identify whether participants believe such data to be useful and the activities in which it would be used. The Group also agreed to seek the views of small players and new entrants as to whether the current non-publication of wider BM Unit registration data represents a barrier to participation in the market.

Although the majority of respondents to the Assessment Consultation did not believe non-publication of wider BM Unit registration data to be a barrier to participation in the market, the majority of respondents did believe non-publication of this data to be a barrier to market transparency – and therefore agreed that the Alternative Modification P169 would better facilitate Applicable BSC Objective (c) compared with the Proposed Modification. Respondents to the consultation argued that publication

of the BM Unit registration data in the CRA-I020 flow would aid market analysis and help Parties monitor their own data. More detail regarding the responses can be found in Section 6.

Having considered the Assessment Consultation responses, the P169 MG unanimously confirmed its view that the Alternative Modification would better facilitate Applicable BSC Objective (c) when compared with the Proposed Modification and the current Code baseline.

The Group's unanimous recommendation is that the Alternative Modification P169 should be made, and therefore that the Proposed Modification P169 should not be made.

1.8 Governance and regulatory framework assessment

The P169 MG discussed whether there were any wider common-law confidentiality rights which might override the provisions of the Code. The Group noted BSCCo's legal advice that, under the existing provisions of V1.3, Parties 'irrevocably and unconditionally' consent to publication of data on the BSC Website (as well as the use and Disclosure of that data by other Parties) where such data is published under paragraph V4 of the Code. The Group noted BSCCo's legal view that no additional confidentiality waiver by Parties would be required in respect of their BM Unit names (Proposed Modification P169) or wider BM Unit registration data (Alternative Modification P169) – since this data would be published in accordance with paragraph V4 under the P169 legal text, and the views of Parties regarding its publication would have been sought during the P169 consultations.

2 COSTS⁵

2.1 Costs of progressing P169 through the Modification Procedures

PROGRESSING MODIFICATION PROPOSAL

Demand Led Cost	£500
ELEXON Resource	35 Man days
	£6,360

⁵ Clarification of the meanings of the cost terms in this section can be found in Annex 5 of this report.

2.2 Implementation costs – Proposed Modification

IMPLEMENTATION COSTS – Proposed Modification P169

		Stand Alone Cost	P169 (Proposed) Incremental Cost	Tolerance
Service Provider⁶ Cost				
	Change Specific Cost	0	0	N/A
	Release Cost	0		N/A
	Incremental Release Cost	0	0	N/A
	Total Service Provider Cost	0	0	N/A
Implementation Cost				
	External Audit	0	0	N/A
	Design Clarifications	0	0	N/A
	Additional Resource Costs	0	0	N/A
	Additional Testing and Audit Support Costs	0		N/A
Total Demand Led Implementation Cost		0	0	N/A

ELEXON Implementation Resource Cost		3.5 man days* £1,050*	N/A*	+/- 5%
Total Implementation Cost		£1,050	N/A	+/- 5%

*Please note that the Proposed Modification P169 would incur changes to the Code and BSCCo systems and processes only. As no Code Subsidiary Documents or other configurable items are impacted (see Section 5.2), there is therefore no cost distinction between implementation as a stand-alone change and as part of a release. The recommended Implementation Date for the Proposed Modification is 10 Working Days following an Authority decision, in order for implementation costs to be potentially shared between the Proposed Modification and P168 – and to enable implementation to take place as soon as practicable. More information can be found in Sections 4 and 9.

⁶ BSC Agent and non-BSC Agent Service Provider and software costs.

ONGOING SUPPORT AND MAINTENANCE COSTS – Proposed Modification P169

	Stand Alone Cost	P169 (Proposed) Incremental Cost	Tolerance
Service Provider Operation Cost	0	0	N/A
Service Provider Maintenance Cost	0	0	N/A
ELEXON Operational Cost	0	0	N/A

2.3 Implementation costs – Alternative Modification

IMPLEMENTATION COSTS – Alternative Modification P169

	Stand Alone Cost	P169 (Alternative) Incremental Cost	Tolerance
Service Provider Cost			
Change Specific Cost	0	0	N/A
Release Cost	0		N/A
Incremental Release Cost	0	0	N/A
Total Service Provider Cost	0	0	N/A
Implementation Cost			
External Audit	0	0	N/A
Design Clarifications	0	0	N/A
Additional Resource Costs	0	0	N/A
Additional Testing and Audit Support Costs	0		N/A
Total Demand Led Implementation Cost	0	0	N/A

ELEXON Implementation Resource Cost		39 man days* £11,700*	9 man days* £2,700*	+/- 5%
Total Implementation Cost		£11,700	£2,700	+/- 5%

* The recommended Implementation Date for the Alternative Modification P169 is 10 Working Days following an Authority decision, with the Code and ELEXON reporting changes to take effect from this date. Although there is also a minor impact on the Reporting Catalogue, the recommendation of the P169 MG is that the Reporting Catalogue change be made at a later opportune date as part of a scheduled release in order to only incur the incremental cost shown above (see Section 9 for further details).

ONGOING SUPPORT AND MAINTENANCE COSTS – Proposed Modification P169

	Stand Alone Cost	P169 (Alternative) Incremental Cost	Tolerance
Service Provider Operation Cost	0	0	N/A
Service Provider Maintenance Cost	0	0	N/A
ELEXON Operational Cost	0	0	N/A

3 RATIONALE FOR MODIFICATION GROUP'S RECOMMENDATIONS TO THE PANEL

Although the majority of P169 MG members believed that the Proposed Modification P169 would better facilitate the achievement of Applicable BSC Objective (c), the Group unanimously agreed that the Alternative Modification would better facilitate the achievement of this objective when compared with the Proposed Modification.

The unanimous recommendation of the P169 MG is therefore that the Alternative Modification P169 should be made with an Implementation Date of 10 Working Days following an Authority decision. The Group agreed that publication on the BSC Website of the BM Unit registration data contained in the CRA-I020 flow would increase the transparency of the electricity market, and thereby facilitate competition. The Group considered that publication of this data could enable participants to achieve greater understanding of the market through modelling activities, and would aid Parties in monitoring their own data.

The P169 MG therefore also unanimously agreed that the Proposed Modification P169 should not be made.

More detail regarding the recommendation of the P169 MG is contained in Sections 1.4 and 1.7 above, whilst the rationale for the proposed Implementation Date can be found in Section 9.

The P169 MG noted that approval of the Alternative Modification P169 would negate the need for P168.

4 IMPACT ON BSC SYSTEMS AND PARTIES

4.1 BSCCo

The table below provides a summary of the effort required by BSCCo to support the implementation of the P169 Proposed and Alternative Modifications. Full cost information can be found in Section 2 of this report.

Area of business	Impact of Proposed Modification	Impact of Alternative Modification
BSC Configuration Administration	2 man days' effort would be required to implement changes to Section V of the Code.	Same as for Proposed Modification.
Market Monitoring	½ man day's effort would be required to add new 'BM Unit name' field to the TOMAS manual report template used to produce the 'Registered BMU' spreadsheet.	½ man day's effort would be required to add new BM Unit registration data fields to the TOMAS manual report template used to produce the 'Registered BMU' spreadsheet.
BSC Website	½ man day's effort would be required to amend the existing explanatory text for the 'Registered BMU' spreadsheet on the CRS Registration Data page (Market Data section).	Same as for Proposed Modification.
CVA Programme	No impact (see Section 5.2).	5 man days' effort would be required to amend the Reporting Catalogue as part of a scheduled Release. Alternatively, 35 man days' effort would be required to amend the Reporting Catalogue as a stand-alone change.
Corporate Assurance	½ man day's effort would be required to amend BSCCo's Obligations Register.	1 man day's effort would be required to provide assurance to the CVA Programme and amend BSCCo's Obligations Register.

The P169 MG considered the similarities between the estimated BSCCo implementation effort for P168 and for the Proposed Modification P169. The Group noted BSCCo's advice that combining the implementation of P168 and the Proposed Modification P169 would incur only the P168 costs, due to the similarities in the solutions (and since the Proposed Modification P169 is estimated to require less effort than P168).

The P169 MG also noted that if the Alternative Modification P169 was implemented, P168 would no longer be required – since the BM Unit registration data which would be published under the Alternative includes GC and DC values.

The P169 MG therefore considered that it would be desirable for the Authority to make its decisions regarding P168 and P169 simultaneously.

4.2 BSC Systems

No impact.

4.3 Parties and Party Agents

P169 requires no changes to any systems or processes used by Parties. However, P169 impacts Parties to the extent that the names of their BM Units (Proposed Modification) and wider BM Unit registration data (Alternative Modification) would be made available to all interested parties via the BSC Website. Publication of this data may also aid Parties in carrying out certain activities, such as undertaking market analysis and monitoring their own data.

5 IMPACT ON CODE AND DOCUMENTATION

5.1 Balancing and Settlement Code

Code Section	Impact of Proposed Modification	Impact of Alternative Modification
Section V 'Reporting'	Addition of BM Unit names to the CRS registration data set out in V4.2.3, in order to expressly allow this data to be published on the BSC Website.	Addition of BM Unit registration data (as provided to BSCCo in the Operations Registration Report) to the CRS registration data set out in V4.2.3, in order to expressly allow this data to be published on the BSC Website.

5.2 Code Subsidiary Documents

Document	Impact of Proposed Modification	Impact of Alternative Modification
Reporting Catalogue	No impact (see below).	Addition of list of BM Unit registration data to Section 8.1 'BSCCo Reports Published on BSC Website'.

The P169 MG noted that Section 8 of the Reporting Catalogue details the data items within those BSCCo reports which are published on the BSC Website in accordance with Section V.

However, the Group noted that the Reporting Catalogue already refers to publication of BM Unit names, although these are not currently published since this is not provided for by Section V. Although the Reporting Catalogue therefore conflicts with Section V and with BSCCo's actual reporting, the Group noted that the result of this erroneous inclusion is that no changes would be required to the Reporting Catalogue for the Proposed Modification (should P169 not be made, BSCCo intends to remove the erroneous Reporting Catalogue reference to BM Unit names via an opportune Change Proposal).

The P169 MG noted that changes would, however, be required to the Reporting Catalogue as a result of the Alternative Modification, in order to add additional BM Unit registration data to the list of BSCCo reports which are published on the BSC Website.

5.3 BSCCo Memorandum and Articles of Association

No impact.

5.4 Impact on Core Industry Documents and supporting arrangements

No impact.

6 SUMMARY OF CONSULTATION RESPONSES

10 responses (representing 47 BSC Parties and 1 non-Party) were received to the P169 GB-wide Assessment Consultation.

A summary of the consultation responses is provided below, whilst the Group's discussion of these responses is contained in Section 6.2. Full copies of the responses are attached as Annex 3.

Q.	Consultation question	Yes	No	No comment/ Unsure
1.	Do you believe that the Proposed Modification P169 (publication of BM Unit names) would better facilitate the achievement of the Applicable BSC Objectives?	7 ⁷ (41 + 1)	2 (5)	1 (1)
2.	Do you believe that the potential Alternative Modification P169 (publication of all BM Unit registration data contained in the CRA-I020 flow), when compared with the Proposed Modification, would better facilitate the achievement of the Applicable BSC Objectives?	8 (42 + 1)	1 (4)	1 (1)
3.	Do you support the Modification Group's approach to the format and frequency of publication under the Proposed and potential Alternative Modifications?	8 (42 + 1)	0	2 (5)
4.	Would your organisation use the data which would be published under the Proposed and potential Alternative Modifications?	7 (41 + 1)	0	3 (6)
5.	Do you believe that non-publication of this data represents a barrier to participation in the market?	3 (2 + 1)	5 (34)	2 (11)
6.	Do you believe there are any alternative solutions or any other issues that the Modification Group has not identified and that should be considered?	0	9 (46 + 1)	1 (1)
7.	Are there any further comments on P169 that you wish to make?	1 (+1)	8 (46)	1 (1)

6.1 Modification Group's summary of the consultation responses

6.1.1 Applicable BSC Objectives – Proposed Modification

Majority view

The majority of respondents believed that the Proposed Modification P169 would better facilitate Applicable BSC Objective (c), since they considered that publication of BM Unit names would increase transparency in the market and thereby further competition.

⁷ Number of respondents. Bracketed numbers indicate respectively the number of Parties and non-Parties represented by respondents.

One respondent argued that attaching BM Unit names to the existing IDs on the website would allow users of data to understand which physical plant the data refers to. Another respondent considered availability of, and equality of access to, information to be important requirements of a competitive market.

No respondents identified any reason why BM Unit names should remain Confidential Information under the Code, or any loss which would result to the owners of BM Units from publication of their BM Unit names.

Minority view

However, a minority of respondents did not believe that the Proposed Modification would better facilitate the Applicable BSC Objectives, since they considered that the usefulness of the data had not been proven.

One respondent had no comment.

6.1.2 Applicable BSC Objectives – Alternative Modification

Majority view

The majority of respondents believed that the Alternative Modification P169 would better facilitate Applicable BSC Objective (c), when compared with the Proposed Modification, since the Alternative would make more data available and would therefore better promote transparency and competition in the market.

One respondent supported the Alternative on balance, but noted that cost-benefit considerations should be taken into account.

One respondent argued that almost all the information proposed for publication under the Alternative is either already published elsewhere or is derivable from existing published data. This respondent considered that, by pulling all the data together in one place, the effort required to locate the data would be reduced for participants – thereby improving market transparency. This respondent also noted that the ELEXON implementation effort for the Alternative Modification was not significantly more than that which would be required to implement P168 and the Proposed Modification P169 together. The respondent therefore considered that there was no cost barrier to implementing the Alternative Modification P169.

Another respondent noted that the Alternative Modification could also avoid the costs of future Modification Proposals being raised to release further BM Unit information from the CRA-I020 flow, and therefore believed that the Alternative might also promote efficiency in the implementation and administration of the balancing and settlement arrangements (Applicable BSC Objective (d)).

One respondent, who did not support the Proposed Modification P169, believed that there was more value in the Alternative Modification. This respondent considered that publication of wider BM Unit data would improve transparency, and that such data might be used by participants to aid their decision-making processes.

No respondents identified any reason why BM Unit registration data should remain Confidential Information under the Code, or any loss which would result to the owners of BM Units from publication of this data.

Minority view

One respondent did not believe that the Alternative Modification would better facilitate the Applicable BSC Objectives, since they considered that the usefulness of the data had not been proven.

One respondent had no comment.

6.1.3 Format and frequency of publication

Those respondents who commented on the solution developed by the P169 Modification Group unanimously supported the Group's approach to the format and frequency of publication under the Proposed and Alternative Modifications.

These respondents agreed that the current weekly publication of a comma-separated (or '.csv') file, which can be opened using software such as Microsoft® Excel,⁸ was sufficient for general publication.

One respondent considered that this approach represented a pragmatic solution in that it would ensure that the data was up-to-date enough to be of value, without placing too onerous an obligation on BSCCo regarding its publication.

6.1.4 Use of data

Majority view

The majority of respondents indicated that their organisations would use the data provided under the Proposed and Alternative Modifications. These respondents argued that this information would be useful since it would enable Parties to monitor their own data through an 'easy reference point', and aid participants in market modelling activities.

One respondent argued that the data which would be provided under the Proposed and, especially, the Alternative Modification would help improve participants' understanding of the operation of the market – since it would aid analysis of the metering and settlement data which is already made available to all participants under P114.⁹

One respondent stated that publication of such data would provide their organisation with more information to aid them in creating their own model of the UK wholesale market and, specifically, its interaction with continental wholesale markets through the Interconnector.

Another respondent indicated that their organisation would use the data provided in the Alternative Modification to track CALF, BMCAIC and BMCAEC values.

One respondent, who did not support the Proposed Modification, believed that their organisation would potentially use the data provided under the Alternative – although they envisaged that their use of such data would be relatively infrequent.

Minority view

One respondent, who did not support either the Proposed or Alternative Modifications, stated that at present they had no obvious use for the data.

One respondent had no comment.

6.1.5 Potential barrier to market participation

Majority view

The majority of respondents did not believe that the current non-publication of BM Unit names or wider BM Unit data represents a barrier to participation in the market.

⁸ Microsoft is a registered trademark or trademark of Microsoft Corporation in the U.S. and/or other countries.

⁹ Modification P114 'Entitlement of Licence Exemptable Generators and other non-Trading Parties to BSC membership without evidence of trading' was implemented on 24 February 2004, and allows non-Parties to obtain certain data via a licensing agreement.

One of these respondents considered the publication of this data to be useful, rather than essential. Another respondent also stated that the data would be a 'nice to have', rather than an essential requirement.

One respondent did not believe non-publication of BM Unit data to be a barrier to new entrants or small Parties, since they argued that the same information can be derived using existing data. Since this existing data is made available publicly to non-Parties as well as existing Parties, the respondent did not consider this to be a barrier to new entrants. The respondent stated their view that the cost and effort of deriving the information using existing data was the same for all participants, and that if non-publication of BM Unit data discriminated against competition then this would therefore apply equally to all participants – including both large and small Parties and non-Parties. The respondent did not believe that non-Parties or smaller players would lack the knowledge needed to obtain the information using existing data.

One respondent did not believe non-publication to be a barrier to market participation since they could not see what use companies would have for the data.

Minority view

One respondent considered that non-publication of BM Unit names or wider BM Unit data could possibly be viewed as a barrier to competition, and commented that the opinion of smaller players and new entrants should be taken into account.

A minority of respondents also believed that non-publication of the data represents a current barrier to participation in the market.

One respondent argued that current participants have accumulated knowledge on the operation of the market, which new entrants are less likely to have. This respondent stated their view that non-publication of the data would represent a barrier to participation in the market for organisations which did not have such accumulated knowledge. The respondent considered that, by publishing more data on the operation of the market, P169 would therefore help 'level the playing field' between new and existing participants.

Another respondent consider that, as a general rule, the market would become more competitive with the more information that is published – and the less barriers to new entrants would remain.

One respondent considered that it was unlikely that any potential new entrants would be put off by the lack of this information, and therefore did not agree that non-publication of the data represents a barrier to entry. However, this respondent did consider that non-publication of data represents a barrier to competition within the market if the information is not made available equally to all participants.

One respondent had no comment.

6.1.6 Alternative solutions/other issues

No respondents believed there to be any alternative solutions or other issues which had not been considered by the Modification Group.

6.1.7 Further comments

One respondent noted that one of the data items proposed for publication under the Alternative Modification P169 was the 'effective to' date of the BM Unit. This respondent noted that, in practice, this would always appear as a blank field within the 'Registered BMU' spreadsheet since this contains data relating to live BM Units only. The respondent therefore considered that it was not necessary to include this field within the solution for the Alternative Modification.

This respondent, although recognising that the matter was outside the scope of P169, also referenced the original recommendation of the ISG expert group that the full CRA-I020 contents be published. The respondent expressed their preference for this information to have been made available to all Parties and licensed data users under P114.

6.2 Comments and views of the Modification Group regarding consultation responses

The P169 MG noted the views provided in the Assessment Consultation responses.

The Group noted the comment of one respondent that the 'effective to' date would always be a blank field for live BM Units, and therefore agreed that this should not be included in the solution for the Alternative Modification. BSCCo confirmed that the removal of this field would have no impact on the implementation costs of the Alternative.

The P169 MG noted that no specific GB issues had been raised by respondents following BETTA Go-Active.

The Group had no further comments on the consultation responses.

7 SUMMARY OF TRANSMISSION COMPANY ANALYSIS

7.1 Analysis

The Transmission Company did not believe either the Proposed or Alternative Modifications for P169 to have any impact on its ability to discharge its responsibilities under the Transmission Licence, its systems or processes, or any Core Industry Document.

The Transmission Company expressed its view that the Proposed Modification P169 would better facilitate Applicable BSC Objective (c) by increasing the overall transparency of the market.

The Transmission Company considered that it was more appropriate for Parties to comment on the merits of publishing a wider spectrum of their BM Unit registration data under the potential Alternative Modification. However, the Transmission Company supported the general principle of transparency, and suggested that Party information should be made available to all industry participants unless there was a steadfast reason for it to remain confidential.

The Transmission Company confirmed that its assessment applied on a GB-wide basis.

A copy of the Transmission Company's analysis and impact assessment is contained in Annex 4.

7.2 Comments and views of the Modification Group

The P169 MG noted the analysis and views of the Transmission Company.

8 SUMMARY OF EXTERNAL ADVICE

None commissioned.

9 IMPLEMENTATION APPROACH

Proposed Modification

The P169 MG agreed to recommend a Code Implementation Date for the Proposed Modification P169 of 10 Working Days after an Authority decision.¹⁰ The Group noted that no changes to any Code Subsidiary Documents were required as a result of the Proposed Modification, since the Reporting Catalogue already erroneously refers to publication of BM Unit names (see Section 5.2).

Alternative Modification

The Group agreed to recommend a Code Implementation Date for the Alternative Modification P169 of 10 Working Days after an Authority decision, with the publication of the relevant BM Unit registration data to take effect from this date.¹⁰

The P169 MG noted that the Alternative Modification P169 would also result in a minor impact on the Reporting Catalogue, since this document reflects the reporting requirements of Section V. The Group agreed that the changes to the Reporting Catalogue should be implemented at a later opportune stage as part of a scheduled release in order to minimise the cost of these changes. The Group considered that no risk would result from delaying the Reporting Catalogue changes since the obligations of Section V would take precedence in the event of any perceived inconsistency between the Code and this Code Subsidiary Document.

Interaction with P168

The P169 MG considered the similarities between the estimated BSCCo implementation effort for the Proposed Modification P169 and for P168. The Group noted BSCCo's advice that combining the implementation of P168 and the Proposed Modification P169 would incur only the P168 costs, due to the similarities in the solutions (and since the Proposed Modification P169 is estimated to require less effort than P168).

The P169 MG also noted that if the Alternative Modification P169 was implemented, P168 would no longer be required – since the BM Unit registration data which would be published under the Alternative includes GC and DC values.

The P169 MG therefore considered that it would be desirable for the Authority to make its decisions regarding P168 and P169 simultaneously. The proposed Implementation Date for P168 is also 10 Working Days following an Authority decision.

10 DOCUMENT CONTROL

10.1 Authorities

Version	Date	Author	Reviewer	Change Reference
0.1	28/09/04	Kathryn Coffin	Roger Salomone	For chairman review
0.1	28/09/04	Kathryn Coffin	P169 MG	For MG review
0.1	28/09/04	Kathryn Coffin	Sarah Parsons	For technical review
0.2	05/10/04	Kathryn Coffin	Change Delivery	For quality review
1.0	08/10/04	Change Delivery	BSC Panel	For Panel decision

¹⁰ As the 'Registered BMU' spreadsheet is published every Monday using the previous Friday's data, the first publication of the data would therefore occur on the first Monday following the Code Implementation Date for P169.

10.2 References

Ref	Document	Owner	Issue date	Version
1	Initial Written Assessment for Modification Proposal P169 'Publication of BMU names on ELEXON website' ELEXON - Modification Proposal 169	BSCCo	06/08/04	1.0
2	England & Wales Assessment Consultation document for Modification Proposal P169 'Publication of BMU names on ELEXON website' ELEXON - Modification Proposal 169	BSCCo	20/08/04	1.0
3	GB Assessment Consultation document for Modification Proposal P169 'Publication of BMU names on ELEXON website' ELEXON - Modification Proposal 169	BSCCo	02/09/04	2.0
4	Assessment Report for Modification Proposal P168 'Publication of BMU GC and DC values on ELEXON website' ELEXON - Modification Proposal 168	BSCCo	08/10/04	1.0

ANNEX 1 DRAFT LEGAL TEXT

Draft legal text for the Proposed Modification P169 is included as Annex 1A, and is attached as a separate document.

Draft legal text for the Alternative Modification P169 is also attached as a separate document Annex 1B.

ANNEX 2 MODIFICATION GROUP DETAILS

Member	Organisation	16/08/04	22/09/04
Roger Salomone	ELEXON (Chairman)	✓	✓
Kathryn Coffin	ELEXON (Lead Analyst)	✓	✓
Melanie Henry	ELEXON (Lawyer)	✓	✓
Robert Owens	SmartestEnergy (Proposer's Alternate)	✓	
Man Kwong Liu	SAIC		✓
Carl Wilkes	Npower	✓	✓
Neil Smith	E.ON UK	✓	✓
Mark Manley	Centrica	✓	✓

Attendee	Organisation	16/08/04	22/09/04
Steve Mackay	Ofgem	✓	✓
Phil Hewitt	EnAppSys	✓	

P169 Modification Group Terms of Reference

Modification Proposal P169 will be considered by the P169 Modification Group in accordance with the following Terms of Reference.

P169 – Publication of BMU names on ELEXON websiteAssessment Procedure

- a) The Modification Group will carry out an Assessment Procedure in respect of Modification Proposal P169 pursuant to section F2.6 of the Balancing and Settlement Code.
- b) The Modification Group will produce an Assessment Report for consideration at the BSC Panel Meeting on 14 October 2004.
- c) The Modification Group shall consider and/or include in the Assessment Report as appropriate:
 - **Format and frequency of publication** – the initial ELEXON implementation estimates within the IWA are based on the effort required to add these values to an existing spreadsheet; however the Modification Group may wish to consider any additional or alternative reporting requirements.
 - **Rationale for Disclosing previously-Confidential Information** – the Modification Group shall seek industry views via consultation as to whether BM Unit names should be made available to all interested parties, the rationale as to how this would better facilitate competition in the market, and the extent to which this data would be used by participants.
 - **Interaction with Modification Proposal P168 'Publication of BMU GC and DC values on ELEXON Website' ('P168')** – the Panel has determined that P168 and P169 should be progressed separately, and that the P168 discussions focus only on developing the solution for publishing GC and DC values (with any broader issues relating to the principles of Confidential Information or data publication to be considered under P169).¹¹
 - **Potential Alternative Modification** – the Modification Group shall consider whether to progress a potential Alternative Modification, whereby the full contents of the CRA-I020 data flow (the Operations Registration Report sent by the Central Registration Agent to BSCCo and the Transmission Company) could be made available on the BSC Website. This would be similar to an approach recommended to the Imbalance Settlement Group by an expert group in October 2003 (ISG 33/370). Such a potential Alternative might also avoid the costs of future Modification Proposals being raised to Disclose such data, and would remove the need to implement both P168 and P169.
 - **Additional points raised by the BSC Panel on 12 August 2004**
 - See interaction with P168 above;
 - What is the value to the recipient, and the loss to the owner, resulting from the publication of BM Unit names?
 - Include consultation question regarding whether non-publication of BM Unit names is a barrier to new entrants/small Parties.

ANNEX 3 ASSESSMENT CONSULTATION RESPONSES

Attached as separate document Annex 3A.

¹¹ At its meeting of 2 September 2004 the Panel subsequently agreed to extend the Assessment Procedure for P168 by one month in order to undertake a GB-wide Assessment Consultation (see Section 1.1.5).

ANNEX 4 TRANSMISSION COMPANY ANALYSIS

Q	Question	Response
1	Please outline any impact of the Proposed Modification and potential Alternative Modification on the ability of the Transmission Company to discharge its obligations efficiently under the Transmission Licence and on its ability to operate an efficient, economical and co-ordinated transmission system.	None.
2	Please outline the views and rationale of the Transmission Company as to whether the Proposed Modification and potential Alternative Modification would better facilitate achievement of the Applicable BSC Objectives. <i>In particular, please indicate whether the Transmission Company believes that any of the data items proposed for publication as part of the P169 potential Alternative should remain Confidential Information under the Code.</i>	We believe that the proposal better facilitates BSC Applicable Objective c) for promoting effective competition in generation and supply of electricity by increasing the overall transparency in the market. We believe that it is more appropriate for Parties to comment on the publication of a wider spectrum information contained in the CRA I020, as proposed in the potential Alternative Modification. However, in support of the general principle of transparency we would suggest that Party information should be made available to all industry participants unless there is a steadfast reason for this information to remain confidential.
3	Please outline the impact of the Proposed Modification and potential Alternative Modification on the computer systems and processes of the Transmission Company, including details of any changes to such systems and processes that would be required as a result of the implementation of the Proposed Modification and potential Alternative Modification.	No impact.
4	Please outline any potential issues relating to the security of supply arising from the Proposed Modification and potential Alternative Modification.	No issues.
5	Please provide an estimate of the development, capital and operating costs (broken down in reasonable detail) which the Transmission Company anticipates that it would incur in, and as a result of, implementing the Proposed Modification and potential Alternative Modification.	No direct costs have been identified.
6	Please provide details of any consequential changes to Core Industry Documents that would be required as a result of the implementation of the Proposed Modification and potential Alternative Modification.	No consequential changes have been identified.
7	Any other comments.	

ANNEX 5 CLARIFICATION OF COSTS

There are several different types of costs relating to the implementation of Modification Proposals. ELEXON implements the majority of Approved Modifications under its CVA or SVA Release Programmes. These Programmes incur a base overhead which is broadly stable whatever the content of the Release. On top of this each Approved Modification incurs an incremental implementation cost. The table of estimated costs of implementing the Proposed/Alternative Modification given in section 2 of this report has three columns:

- **Stand Alone Cost** – the cost of delivering the Modification as a stand alone project outside of a CVA or SVA Release, or the cost of a CVA or SVA Release with no other changes included in the Release scope. This is the estimated maximum cost that could be attributed to any one Modification implementation.
- **Incremental Cost** - the cost of adding that Modification Proposal to the scope of an existing release. This cost would also represent the potential saving if the Modification Proposal was to be removed from the scope of a release before development had started.
- **Tolerance** – the predicted limits of how certain the cost estimates included in the template are. The tolerance will be dependent on the complexity and certainty of the solution and the time allowed for the provision of an impact assessment by the Service Provider(s).

The cost breakdowns are shown below:

PROGRESSING MODIFICATION PROPOSAL	
Meeting Cost	This is the cost associated with holding Modification Group meetings and is based on an estimate of the travel expenses claimed by Modification Group members.
Legal/Expert Cost	This is the cost associated with obtaining external expert advice, usually legal advice.
Impact Assessment Cost	Service Provider Impact Assessments are covered by a pre-determined monthly contractual charge. Therefore the cost included in this report is an estimate based on the level of impact assessment that the modification is expected to require and may not reflect the actual cost attributed to the modification, which will be based on a percentage of the contractual impact assessment costs for each month that it is assessed.
ELEXON Resource	This is the ELEXON Resource requirement to progress the Modification Proposal through the Modification Procedures. This is estimated using a standard formula based on the length of the Modification Procedures.

SERVICE PROVIDER¹² COSTS	
Change Specific Cost	Cost of the Service Provider(s) Systems development and other activities relating specifically to the Modification Proposal.
Release Cost	Fixed cost associated with the development of the Service Provider(s) Systems as part of a release. This cost encompasses all the activities that would be undertaken regardless of the number or complexity of changes in the scope of a release. These activities include Project Management, the production of testing and deployment specifications and reports and various other standard release activities.
Incremental Release Cost	Additional costs on top of base Release Costs for delivering the specific Modification Proposal. For instance, the production of a Test Strategy and Test Report requires a certain amount of effort regardless of the number of changes to be tested, but the addition of a specific Modification Proposal may increase the scope of the Test Strategy and Test Report and hence incur additional costs.

IMPLEMENTATION COSTS	
External Audit	Allowance for the cost of external audit of the delivery of the release. For CVA BSC Systems Releases this is typically estimated as 10% of the total Service Provider Costs, with a tolerance of +/- 20%. At present the SVA Programme does not use an external auditor, so there is no External Audit cost associated with an SVA BSC Systems Release.
Design Clarifications	Allowance to cover the potential cost of making any amendments to the proposed solution to clarify any ambiguities identified during implementation. This is typically estimated as 5% of the total Service Provider Costs, with a tolerance of +/- 100%.
Additional Resource Costs	<p>Any short-term resource requirements in addition to the ELEXON resource available. For CVA BSC Systems Releases, this is typically only necessary if the proposed solution for a Modification Proposal would require more extensive testing than normal, procurements or 'in-house' development.</p> <p>For SVA BSC Systems Releases, this will include the management and operation of the Acceptance Testing and the associated testing environment.</p> <p>This cost relates solely to the short-term employment of contract staff to assist in the implementation of the release.</p>

¹² A Service Provider can be a BSC Agent or a non-BSC Agent, which provides a service or software as part of the BSC and BSC Agent Systems. The Service Provider cost will be the sum of the costs for all Service Providers who are impacted by the release.

Additional Testing and Audit Support Costs	Allowance for external assistance from the Service Provider(s) with testing, test environment and audit activities. Includes such activities as the creation of test environments and the operation of the Participant Test Service (PTS). For CVA BSC Systems Releases, this is typically estimated as £40k per release with at tolerance of +/-25%. For SVA BSC Systems Releases this is estimated on a Modification Proposal basis.
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TOTAL DEMAND LED IMPLEMENTATION COSTS

This is calculated as the sum of the total Service Provider(s) Cost and the total Implementation Cost. The tolerance associated with the Total Demand Led Implementation Cost is calculated as the weighted average of the individual Service Provider(s) Costs and Implementation Costs tolerances. This tolerance will be rounded to the nearest 5%.

ELEXON IMPLEMENTATION RESOURCE COSTS

Cost quoted in man days multiplied by project average daily rate, which represents the resources utilised by ELEXON in supporting the implementation of the release. This cost is typically funded from the "ELEXON Operational" budget using existing staff, but there may be instances where the total resources required to deliver a release exceeds the level of available ELEXON resources, in which case additional Demand Led Resources will be required.

The ELEXON Implementation Resource Cost will typically have a tolerance of +/- 5% associated with it.

ONGOING SUPPORT AND MAINTENANCE COSTS

ELEXON Operational Cost	Cost, in man days per annum multiplied by project average daily rate, of operating the revised systems and processes post implementation.
Service Provider Operation Cost	Cost in £ per annum payable to the Service Provider(s) to cover staffing requirements, software or hardware licensing fees, communications charges or any hardware storage fees associated with the ongoing operation of the revised systems and processes.
Service Provider Maintenance Cost	Cost quoted in £ per annum payable to the Service Provider(s) to cover the maintenance of the amended BSC Systems.

ANNEX 6 CONTENTS OF CRA-I020 FLOW

NB: the data items in 5.2.1(c) (marked in bold) are those which would be provided on the BSC Website under the potential Alternative Modification P169, with the exception of the 'effective to' date.

5.2 Operations Registration Report to BSCCo and the Transmission Company

5.2.1 Operations Registration Details:

- (a) Proportion of Losses Details:
 - Action Code
 - Proportion of Losses (alpha)
 - Effective From Date

- (b) Trading Unit Registration:
 - Action Code
 - Trading Unit Name

- (c) **BM Unit Registration:**
 - **Action Code**
 - **BM Unit ID**
 - **BM Unit Type**
 - **Lead Party ID**
 - **NGC BM Unit Name**
 - **BM Unit Name**
 - **GSP Group ID**
 - **GSP Group Name**
 - **Trading Unit Name**
 - **Generation Capacity (MW)**
 - **Demand Capacity (MW)**
 - **Production/Consumption Flag**
 - **Production/Consumption Status**
 - **Transmission Loss Factor**
 - **Credit Assessment Load Factor**
 - **BM Unit Credit Assessment Import Capability**
 - **BM Unit Credit Assessment Export Capability**
 - **Exempt Export Flag**
 - **Base Trading Unit Flag**
 - **FPN Flag**
 - **Interconnector ID**
 - **Effective From Date**
 - Effective To Date

- (d) BM Unit Group Details:
 - Action Code
 - Joint BM Unit ID
 - Effective From Date
 - Effective To Date
 - Joint BM Unit Details

- Action Code
- BM Unit ID

(e) Interconnector Registration Details:

- Action Code
- Interconnector ID
- Interconnector Administrator ID
- Interconnector Error Administrator ID
- Effective From Date
- Effective To Date

(f) Market Index Data Provider Details (to BSCCo only)

- Market Index Data Provider ID
- Market Index Data Provider Name
- Registration Details
 - Registration Effective From
 - Registration Effective To
 - Name
 - Address
 - Telephone No
 - Fax No
 - e-mail address