

## Assessment Consultation Responses: P297 'Receipt and Publication of New and Revised Dynamic Data items'

**Consultation issued on 03 October 2013**

We received responses from the following Parties:

| Company  | No BSC Parties / Non-Parties Represented | Role of Parties/non-Parties represented  |
|--|--|--|
| <b>EDF Energy</b>  | <b>10/0</b>                              | <b>Generator / Supplier / Party Agent / Consolidator / Exemptable Generator / Trader</b> |
| <b>E.ON UK plc</b>   | <b>4/0</b>                               | <b>Supplier/Generator/Trader</b>   |
| <b>IBM UK Ltd for and on behalf of the ScottishPower Group</b> | <b>7/0</b>                               | <b>Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor</b> |
| <b>National Grid Electricity Transmission plc</b>              | <b>0/1</b>                               | <b>Transmission Company</b>  |
| <b>RWE Supply &amp; Trading GmbH</b>                           | <b>9/0</b>                               | <b>Supplier/Generator/Trader / Consolidator / Exemptable Generator / Party Agent</b>     |

What stage is this document in the process?

**01** Initial Written Assessment

**02** Definition Procedure

**03** Assessment Procedure

**04** Report Phase

Question 1: Do you agree that the draft legal text in Attachment A delivers the intention of the P297 Proposed solution?

### Summary

| Yes | No | Neutral/Other |
|-----|----|---------------|
| 5   | 0  | 0             |

### Responses

| Respondent   | Response | Rationale  |
|--|----------|--|
| <b>EDF Energy</b>  | Yes      | Appears to correctly add Last Time to Cancel Synchronisation (LTCS) to the Dynamic Data Set in Section Q and ANNEX X-2: TECHNICAL GLOSSARY of the BSC. |
| <b>E.ON UK plc</b>   | Yes      | The legal text simply reflects the new parameter.  |
| <b>IBM UK Ltd for and on behalf of the ScottishPower Group</b> | Yes      | -  |
| <b>National Grid Electricity Transmission plc</b>              | Yes      | -  |
| <b>RWE Supply &amp; Trading GmbH</b>                           | Yes      | -  |

Question 2: Do you have any comments on the draft redlined changes to NETA IDD Part 1 (Attachment B) and NETA IDD Part 2 (Attachment C)?

### Summary

| Yes | No | Neutral/Other |
|-----|----|---------------|
| 2   | 3  | 0             |

### Responses

| Respondent         | Response | Rationale  |
|--------------------|----------|--|
| <b>EDF Energy</b>  | Yes      | NETA IDD seems to suggest that new message structures will continue to support existing attributes, excluding defined field name changes, which should ease transition to new TIBCO message definitions. |
| <b>E.ON UK plc</b> | No       | -  |

| Respondent   | Response | Rationale  |
|--|----------|--|
| <b>IBM UK Ltd for and on behalf of the ScottishPower Group</b> | No       | -  |
| <b>National Grid Electricity Transmission plc</b>              | Yes      | <p>NETA IDD Part 1 – As I understand that both static SELs and SILs and ones with the new structure of start time, start MW, end time, end MW will be reported in start time, start MW, end time, end MW format, I would question whether SEL and SIL still need to be included in 4.7.4.34. Also, I think it would be worth comparing the changes to 4.7.5.44 &amp; 45 to the structure for MEL and MIL in 4.7.5.28 &amp; 29, given that the new SEL and SIL have a similar data structure to MEL and MIL (accepting that there is a pre and post-gate closure split for MEL and MIL, which is not proposed for SEL and SIL).</p> <p>NETA IDD Part 2 – I have no comments on the content on the changes. Noting that it is proposed that some of the data be detailed in the IDD Part 2 Spreadsheet and some in the BMRA &amp; SAA Interface Specification document as XML schemas can't easily be inserted into the spreadsheet, I think it would be good to understand the governance that applies to the spreadsheet and that for the interface specification.</p> |
| <b>RWE Supply &amp; Trading GmbH</b>                           | No       | -  |

Question 3: Are there any other Alternative Solutions that the P297 Workgroup should consider?

#### Summary

| Yes | No | Neutral/Other |
|-----|----|---------------|
| 0   | 5  | 0             |

#### Responses

| Respondent         | Response | Rationale  |
|--------------------|----------|--|
| <b>EDF Energy</b>  | No       | The TIBCO High Grade messaging service is our solution for delivery of BMRA data so this aligns with the delivery of updated and new dynamic data items. |
| <b>E.ON UK plc</b> | No       | -  |

| Respondent   | Response | Rationale |
|--|----------|-----------|
| <b>IBM UK Ltd for and on behalf of the ScottishPower Group</b> | No       | -         |
| <b>National Grid Electricity Transmission plc</b>              | No       | -         |
| <b>RWE Supply &amp; Trading GmbH</b>                           | No       | -         |

Question 4: Please indicate the impacts of the Proposed solution on your organisation, in particular any perceived lead time and costs.

#### Summary

| Yes | No | Neutral/Other |
|-----|----|---------------|
| 4   | 0  | 1             |

#### Responses

| Respondent   | Response | Rationale  |
|--|----------|--|
| <b>EDF Energy</b>  | Yes      | Multiple system impact in the order of £100K depending on how we decide to implement our changes to align with this modification proposal. We would need at least six months to align with this change.  |
| <b>E.ON UK plc</b>   | Yes      | We are currently investigating the IT related changes required to implement the EBS changes, there will however be a development and implementation lead time and cost. We are not able to provide more information at this time.  |
| <b>IBM UK Ltd for and on behalf of the ScottishPower Group</b> | Yes      | <p>ScottishPower recognise and support the benefits of the proposed solution. Additional transparency to all market participants of data items that National Grid may use/ use for decisions relating to the acceptance of bids and offers in the balancing mechanism will support greater competition amongst participants and lead to the least cost solution for National Grid.</p> <p>The benefits of the solution will outweigh the costs to implement. The Implementation Date should be adequate for any changes to be made to ScottishPower systems.</p> |

| Respondent  | Response | Rationale   |
|---|----------|---|
| <b>National Grid Electricity Transmission plc</b> | N/A      | Not applicable as I am the proposer of the modification.  |
| <b>RWE Supply &amp; Trading GmbH</b>              | Yes      | We will need to modify EDL and other systems to cope with the new parameters and new data on the BMRS. We do not anticipate any particular issues with lead time or costs within the scope of P297. |

## Question 5: Do you agree with the Workgroup's recommended Implementation Approach?

### Summary

| Yes | No | Neutral/Other |
|-----|----|---------------|
| 5   | 0  | 0             |

### Responses

| Respondent   | Response | Rationale   |
|--|----------|---|
| <b>EDF Energy</b>  | Yes      | Implementing this change in November 2014 or February 2015 aligns with our business change activities provided that no subsequent changes are made to the new specified interfaces, in which case we would need to get early sight of these to avoid any possible regret spend. |
| <b>E.ON UK plc</b>   | Yes      | The November 2014 release enables the current EBS go live date of January 2015. Given the development lead times and timescales for a decision, having the February 2015 date as a fallback option is sensible, although this would slightly delay the EBS go live date.        |
| <b>IBM UK Ltd for and on behalf of the ScottishPower Group</b> | Yes      | Aligning with the other changes happening in relation to EBS go live is prudent.  |
| <b>National Grid Electricity Transmission plc</b>              | Yes      | As I am the proposer and a member of the Workgroup.   |
| <b>RWE Supply &amp; Trading GmbH</b>                           | Yes      | -   |

Question 6: Do you agree with the Workgroup’s initial unanimous view that P297 does better facilitate the Applicable BSC Objectives than the current baseline?

### Summary

| Yes | No | Neutral/Other |
|-----|----|---------------|
| 5   | 0  | 0             |

### Responses

| Respondent   | Response | Rationale   |
|--|----------|---|
| <b>EDF Energy</b>  | Yes      | <p>The proposal arises from non-BSC changes in support of more efficient system balancing operation by the Transmission Company, which affect the BSC. It can therefore be considered part of changes better meeting BSC Objective (b) concerning effective system operation.</p> <p>The proposal provides market participants with information to support competitive market activity and monitoring, and therefore better meets BSC Objective (c) concerning competition.</p> <p>The proposal carries an implementation cost which in isolation does not better meet BSC Objective (d) concerning efficiency in implementation of the BSC arrangements. However, considered together with benefits for BSC Objectives (b) and (c) above, we consider the proposal better meets BSC Objectives overall.</p> <p>BSC Objective (e) concerning EU regulations does not appear directly relevant, however we note that increased transparency of data affecting market activity is an overarching aspiration of the EU Target model for electricity, and this proposal promotes data transparency.</p> |
| <b>E.ON UK plc</b>   | Yes      | For the reasons given in the consultation.  |
| <b>IBM UK Ltd for and on behalf of the ScottishPower Group</b> | Yes      | We agree that the Modification does better facilitate Objective c. ensuring that the dynamic data set matches across the various Codes improves efficiency within the market. Maintaining the items as defined within the BSC gives the widest possible audience a view of these items, improving trading opportunities and driving costs downwards, improving competition.   |
| <b>National Grid Electricity Transmission</b>                  | Yes      | I set out my views on this in the Modification Proposal.  |

| Respondent                           | Response | Rationale |
|--------------------------------------|----------|-----------|
| plc                                  |          |           |
| <b>RWE Supply &amp; Trading GmbH</b> | Yes      | -         |

Question 7: Do you agree with the Workgroup's views that P297 should not progress as a Self-Governance Modification?

### Summary

| Yes | No | Neutral/Other |
|-----|----|---------------|
| 5   | 0  | 0             |

### Responses

| Respondent   | Response | Rationale  |
|--|----------|--|
| <b>EDF Energy</b>  | Yes      | The proposal arises from non-BSC changes in support of operation of the national electricity transmission system, which affect the BSC. It aims to provide market participants with information to support efficient competitive market activity. It will have non-trivial IT impact and cost on central systems and on individual participants receiving the affected data flows from BMRS. For these reasons, strictly speaking it does not appear to meet the criteria for Self-Governance. |
| <b>E.ON UK plc</b>   | Yes      | For the reasons given in the consultation.   |
| <b>IBM UK Ltd for and on behalf of the ScottishPower Group</b> | Yes      | The Modification has a direct impact on competition, and therefore cannot be Self-Governance.  |
| <b>National Grid Electricity Transmission plc</b>              | Yes      | This is consistent with the Modification Proposal that I raised.   |
| <b>RWE Supply &amp; Trading GmbH</b>                           | Yes      | -  |

## Question 8: Do you have any further comments on P297?

### Summary

| Yes | No | Neutral/Other |
|-----|----|---------------|
| 2   | 3  | 0             |

### Responses

| Respondent   | Response | Rationale   |
|--|----------|---|
| <b>EDF Energy</b>  | Yes      | We expect reductions in central costs if this proposal is implemented in conjunction with other changes affecting BMRS (for example, P291, P295, CP1397).   |
| <b>E.ON UK plc</b>   | No       | -   |
| <b>IBM UK Ltd for and on behalf of the ScottishPower Group</b> | No       | -   |
| <b>National Grid Electricity Transmission plc</b>              | No       | -   |
| <b>RWE Supply &amp; Trading GmbH</b>                           | Yes      | Just to request that participants are kept informed as to the progress of National Grid's EBS implementation and the ELEXON project and provided with documentation on a timely basis regarding the interfaces for submission and receipt of the new/ revised parameters. |