

## P295 Impact Assessment Responses

What stage is this document in the process?

**Impact Assessment issued on 8 August 2013.**

**01** Initial Written Assessment

**02** Definition Procedure

**03** Assessment Procedure

**04** Report Phase

We received responses from

Company	Role of Parties/non-Parties represented
Moyle Interconnector Ltd	Interconnector Owner
EirGrid Interconnector Ltd	Interconnector Owner / Interconnector Administrator
IBM UK Ltd (on behalf of the ScottishPower Group)	Supplier / Generator / Trader / Consolidator / Exemptable Generator / Distributor
SONI Ltd	Interconnector Administrator / Interconnector Error Administrator
TMA Data Management Ltd	Party Agent
EDF Energy	Generator / Supplier / Party Agent / Consolidator / Exemptable Generator / Trader
National Grid Interconnectors Ltd	Interconnector Administrator / Interconnector Error Administrator
RWE Supply & Trading GmbH	Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent
E.ON	Supplier / Generator / Trader / Consolidator / Exemptable Generator

## Question 1: Will P295 impact your organisation?

### Responses

Respondent	Response
Moyle Interconnector Ltd	<p><b>Yes/No</b></p> <p>If the proposed solution or alternative solution B was progressed P295 would not impact on Moyle Interconnector Ltd ("Moyle"). Alternative solution A would have an impact as it would place an additional obligation on Moyle, via the IA (SONI), to submit transparency data to the BMRA. This is not required to comply with the transparency regulations so P295 would create unnecessary additional cost, requiring new processes and data feeds to submit the data to BMRA.</p>
EirGrid Interconnector Ltd	<p><b>Yes</b></p> <p>If the proposed solution or alternative solution B are progressed there will not be any impact on EirGrid Interconnector Limited (EIL);</p> <p>If alternative solution A is progressed this would have an impact on EIL in our role as Interconnector Administrator (please note that SONI Ltd, another subsidiary of EirGrid Plc, carries out the role of Interconnector Administrator on our behalf). Alternative solution A would place an additional burden on EIL and SONI Ltd to ensure that the appropriate systems and processes are in place to ensure data transmission to the BMRA. This would be unnecessary duplication of data feeds and the associated resources and cost. As per the transparency regulations, the appropriate place for this data to reside is on the European platform EMFIP. It is our intention to submit the transparency regulation data directly to EMFIP and a project is already underway in this regard within EirGrid Plc.</p>
IBM UK Ltd	<p><b>No</b></p>
SONI Ltd	<p><b>Yes</b></p> <p>Alternative solution A will impact SONI as IA for both Moyle and East-West (EWIC) interconnectors as it places an obligation on the IA to submit transparency data to the BMRA in parallel to submission to the EMFIP. This is NOT a requirement of the transparency regulations which the modification is designed to address and will incur additional costs in establishing and submitting data to the BMRA.</p>
TMA Data Management Ltd	<p><b>No</b></p>
EDF Energy	<p><b>Yes/No</b></p> <p>Yes, if it is decided that BMRS will report new data items, or revise existing data items. For new data items, we would incur minor costs checking that our interfaces can accommodate the new data items, and some more significant costs if we decide to actively process the</p>

Respondent	Response
	<p>new data items into internal systems.</p> <p>For revision to existing data items, we could incur some costs in adapting our interfaces and internal processes to accommodate the changes.</p> <p>If there are no changes to BMRS reporting, there would be no impact.</p>
National Grid Interconnectors Ltd	<p><b>Yes</b></p> <p>Alternative Solution A would impact NGIC with the implementation and maintenance of an additional technical interface between IFA commercial systems and BMRA.</p>
RWE Supply & Trading GmbH	<p><b>Yes</b></p> <ul style="list-style-type: none"> <li>i) We will be required to submit data to National Grid that will be published as Transparency data under this change.</li> <li>ii) We will need to receive new BMRS data published via the Tibco service.</li> </ul>
E.ON	<p><b>No</b></p>

## Question 2: Will your organisation incur any costs in implementing P295?

### Responses

Respondent	Response
Moyle Interconnector Ltd	<p><b>Yes/No</b></p> <p>Moyle will not directly incur costs in implementing P295 but SONI, as IA for Moyle, would incur costs under alternative solution A. There would be one-off costs involved in setting up the IT systems to provide the relevant data feeds to BMRA, maintenance costs in ensuring the continual reliable operation of the feeds and staff costs in monitoring the operation of the feeds and dealing with any issues as they arise.</p>
EirGrid Interconnector Ltd	<p><b>Yes</b></p> <p>If the proposed solution or alternative solution B is progressed EirGrid Interconnector Limited (EIL) will not incur any costs in relation to P295.</p> <p>If alternative solution A is progressed, EIL would incur costs in implementing P295. Initially, there would be one-off costs relating to setting up the IT systems to provide the data feeds between the Auction Management Platform (AMP) and BMRA.</p> <p>Once the initial systems have been set up there would be on-going costs incurred in relation to maintenance and operation of the data feeds to ensure the systems are communicating correctly and to address any issues in relation to IT/systems/data as they arise.</p> <p>If the periodicity and format of the data feeds were not consistent with those used on EMFIP, this would lead to additional cost and resources both in the initial set-up period and in the ongoing operational period.</p>
IBM UK Ltd	<p><b>No</b></p>
SONI Ltd	<p><b>Yes</b></p> <p>For Alternative solution A, there will be costs in specifying, designing and implementing the data feeds to the BMRA. There will also be ongoing staff and maintenance costs associated with the support and monitoring of the data feeds and addressing any issues. In addition, the periodicity of data transfer may be more onerous than that required on the EMFIP platform. It is not possible to be definitive on these costs at this stage without a full impact assessment being carried out. (The timing of BSC Systems Releases is immaterial).</p> <p>Please also note that there is no provision in the current SONI price control for additional work of this nature and any costs would have to be approved by the Northern Ireland Authority for Utility Regulation before any work is undertaken.</p>

Respondent	Response
TMA Data Management Ltd	<b>No</b>
EDF Energy	<p><b>Yes/No</b></p> <p>If it is decided that BMRS will report new data items, we would incur minor costs checking that our interfaces can accommodate the new data items.</p> <p>If it is decided that BMRS will revise existing data flows, there would be more significant costs to adapt existing interfaces and processes to accommodate the changes.</p> <p>There would be more significant costs if we decide to actively process the new data items into internal systems, timescales for which would be internal.</p> <p>If there are no changes to BMRS reporting, there would be no costs.</p>
National Grid Interconnectors Ltd	<p><b>Yes</b></p> <p>Alternative A would incur implementation and maybe maintenance costs for NGIC, for the additional technical interface between IFA commercial systems and BMRA. These costs have not been evaluated. NGIC has no pass-through or recovery mechanism for such costs.</p>
RWE Supply & Trading GmbH	<p><b>Yes</b></p> <p>i) We will need to derive, format and submit new data to National Grid to meet the Transparency regulation requirements.</p> <p>ii) We will need to accommodate the new Tibco feeds of BMRS data.</p> <p>In terms of providing an estimate of costs this is very difficult to do in the absence of any detailed design documentation regarding the above two elements of work. However, based on similar projects costs could be in the region of £100k. Whether P295 is implemented as part of or outside a normal BSC systems release will make no difference to costs.</p>
E.ON	<b>No</b>

## Question 3: How long (from point of Ofgem approval) would you need to implement P295?

### Responses

Respondent	Response
Moyle Interconnector Ltd	<p><b>Unknown</b></p> <p>As per above, P295 only impacts Moyle if alternative solution A is progressed. The lead time is unknown at the time of writing but please refer to SONI's response to this question as they would implement this on Moyle's behalf.</p>
EirGrid Interconnector Ltd	<p><b>Unknown</b></p> <p>As per above, only alternative solution A would require EIL to implement a system solution to P295. It would not be possible to estimate a lead-time until a meeting between system analysts from BMRA and EIL has taken place to discuss requirements of the two systems at either end of the communication link.</p>
IBM UK Ltd	<p><b>5WD</b></p> <p>5wd to allow for update to internal documentation</p>
SONI Ltd	<p><b>Unknown</b></p> <p>It is not possible to provide an estimate at this stage without a full impact assessment.</p>
TMA Data Management Ltd	<p><b>N/A</b></p>
EDF Energy	<p><b>0/3/6 Months</b></p> <p>If there are no changes to BMRS reporting, we require no notice.</p> <p>If there are new data flows reported, we would prefer 3 months notice to ensure our interfaces can accommodate the new items. We would require longer to integrate the new data items into our internal processes, but because this is optional we would not require additional notice for it.</p> <p>If there are revisions to existing data flows, we would require 6 months notice to ensure our interfaces and internal processes can accommodate the revised items. In this case, there could be advantage in implementation within a scheduled release.</p>
National Grid Interconnectors Ltd	<p><b>Unknown but by Dec 14</b></p> <p>Technical assessment is under way, and NGIC will be working towards compliance with the Transparency Regulation by December 2014.</p>
RWE Supply & Trading GmbH	<p><b>4 Months</b></p> <p>The anticipated lead time is approximately 4 months from the point</p>

Respondent	Response
	<p>at which design documentation is available from both National Grid and Elexon. Both of the activities listed in Question 1 are the drivers for the timescale quoted. Whether P295 is implemented as part of or outside a normal BSC systems release will make no difference to the implementation timescale.</p>
E.ON	<p>-</p> <p>As part of a normal BSC Systems Release is nearly always preferable for any changes that require alterations to our systems, but in this case this is not an issue.</p>

Question 4: Do you agree with the Workgroup that all of the required Transparency regulation data submitted to the BMRA should be published on the BMRS?

**Responses**

Respondent	Response
<p>Moyle Interconnector Ltd</p>	<p><b>No</b></p> <p>No. Publication of all the transparency data on BMRS would mean duplication of transparency data published on the EMFIP which can only mean additional cost. While parties may be familiar with currently using BMRS I do not see that it would be particularly difficult for them to seek out information they require from the EMFIP. In a similar vein, I do not see that it is necessary for interconnector transparency data to be published on BMRS. This will result in data being published multiple times (on EMFIP, interconnector platforms and on BMRS). This additional publication on BMRS would be of little value to interconnector users as they will already have access to it elsewhere. Given that P295 aims to satisfy the transparency regulation requirements we would see publication of interconnector data on BMRS as being somewhat out of scope. If there was a genuine need for the data to be published on BMRS we would expect this to be addressed by a market participant raised modification, rather than P295.</p>
<p>EirGrid Interconnector Ltd</p>	<p><b>No</b></p> <p>No. A key outcome from the Transparency Regulations is that all transparency data will be published on one central platform; this will counter the need for market participants/stakeholders to traverse a number of different platforms/websites/ftp downloads etc. to get access to the data and information they require. Publishing this data on the BMRS is an unnecessary duplication and will inevitably lead to inefficient use of time, resources and additional cost.</p> <p>EirGrid Interconnector Limited does not believe Interconnector Transparency data should be published on the BMRS. As per above, this data will already be available in one central European platform (EMFIP) and publication on BMRS will add little or no value. Many interconnector users operate across many zones in Europe and EMFIP will be the most logical location for these users to seek transparency data rather than visiting a number of regional platforms to acquire all the information they require. Publication of interconnector transparency data would also place additional resource, time and cost expense on Interconnector owners and Interconnector Administrators; this additional cost would not be justified as it would place an additional obligation beyond the transparency regulations on Interconnectors.</p>
<p>IBM UK Ltd</p>	<p><b>Yes</b></p> <p>The BMRS is a cornerstone service for the GB Electricity market</p>



Respondent	Response
	<p>which is used by the vast majority of Parties, regardless of size and capability. It should be retained with all available information until such a time as the European platform has a similar proven track record.</p>
SONI Ltd	<p><b>No</b></p> <p>There is no evidence that publication of the transparency data on the BMRS would be of any material use whatsoever. Indeed, SONI believe that it would actually create more confusion through the publication of data on multiple platforms, most likely in different presentational formats.</p> <p>Interconnector users already have all information available to them via the 'FUI' portal (<a href="http://www.fui-portal.eu/">http://www.fui-portal.eu/</a>) and on the Auction Management Platforms. The data will also now be published on the EMFIP platform.</p> <p>The publication of data on the BMRS is NOT a requirement of the transparency data publication requirements which P295 is meant to address.</p> <p>If there is a genuine requirement for the publication of interconnector data on the BMRS then we would have expected this to be raised before via a modification.</p>
TMA Data Management Ltd	<p><b>Yes</b></p>
EDF Energy	<p><b>Yes</b></p> <p>Provided the cost is reasonable, and sufficient notice of change is given, it seems sensible to make transparency data available on BMRS. In the very long term, participants may wish to obtain data from the EU Central Platform instead. But use of the BMRS platform, with familiar interfaces and operation specific to GB, could be more efficient for GB participants in the shorter term as the EU model evolves.</p>
National Grid Interconnectors Ltd	<p>-</p> <p>NGIC's main concern is around the creation of an obligation to send Interconnector data to BMRA (as per Alternative A). In addition, data relating to IFA (and other interconnectors) is already published on the FUI Portal, ENTSOE (EMFIP in future) and auction platforms, and hence there may be limited benefits for the cost involved in creating an additional site (BMRS) containing Interconnector data.</p> <p>NGIC is more neutral over whether Transmission Company data is published on BMRS.</p>
RWE Supply & Trading GmbH	<p><b>Yes</b></p> <p>We agree for convenience of access to data although for the purpose of the Regulation it is only necessary to publish the data on the</p>

Respondent	Response
	central European platform. If data are published on the BMRS for the purpose of having all data accessible from the same system then this should preferably include the Interconnector data.
E.ON	<p><b>Yes</b></p> <p>For completeness all required data should be published on BMRS, including Interconnector Transparency data if possible. It would be preferable if no 'scraping' from EMFIP was required to achieve this; i.e. to minimise potential delays and risk of errors, for the Interconnector data also to be submitted directly to the BMRA for publication on BMRS. However we believe that scraping this data, if that is necessary to include it in BRMS publication, would be preferable to not including interconnector data at all. While some parties might choose to go straight to the source, looking/scraping directly from EMFIP themselves, it would seem most accessible particularly for smaller parties to collate all Transparency data on BMRS.</p>

Question 5: Do you believe there are any possible alternatives to P295 that the Workgroup should consider?

**Responses**

<b>Respondent</b>	<b>Response</b>
Moyle Interconnector Ltd	<b>No</b> No suggestions.
EirGrid Interconnector Ltd	<b>No</b> No suggestions
IBM UK Ltd	<b>No</b>
SONI Ltd	<b>Yes</b>  There is no requirement to publish transparency data on the BMRS especially in relation to interconnectors.  Data should be sent to EMFIP directly by the data owners and not by Elexon as this is the legal requirement. If Elexon do send data to EMFIP then, as this is on behalf of primary data providers, SONI would expect a legal framework to support this arrangement.
TMA Data Management Ltd	<b>No</b>
EDF Energy	<b>No</b>  None at this time.
National Grid Interconnectors Ltd	<b>Yes</b>  An alternative could be that Interconnectors may individually have the option to create the interface at any time to BMRA for data publication on BMRS.
RWE Supply & Trading GmbH	<b>No</b>
E.ON	<b>No</b>

## Question 6: Would you like to make any further comments on P295?

### Responses

Respondent	Response
Moyle Interconnector Ltd	<p><b>Yes</b></p> <p>To reiterate points made above, we would be supportive of the proposed solution for P295. Our concerns are around any alternative solution which places an additional and, in our opinion, unnecessary obligation on interconnectors. This modification should focus on meeting the requirements of the transparency regulation rather than adding to BMRS reporting requirements. We note that some parties have expressed the view that all interconnector data published on EMFIP should be duplicated on BMRS. However, the majority of data to be published on EMFIP is available elsewhere at present and there has been no request for this to be made available on BMRS other than as part of this modification. Given that this data will soon be consolidated on EMFIP, an improvement on the current situation, we do not see any compelling argument or need for this to be duplicated on BMRS.</p>
EirGrid Interconnector Ltd	<p><b>Yes</b></p> <p>EirGrid Interconnector Limited (EIL) believes there is no benefit to the duplicate transmission of data from the BMRA to BMRS and EMFIP in the proposed solution; and this duplicate publication of data is counter to the aims of the transparency regulations in having one central repository and platform for transparency data across Europe.</p> <p>EIL is greatly concerned with the additional resources, time and cost which would be incurred if alternative solution A was progressed; EIL believes this would be an unnecessary duplication of data transmission and publication and would add no value to market participants/stakeholders.</p>
IBM UK Ltd	<p><b>No</b></p>
SONI Ltd	<p><b>Yes</b></p> <p>P295 should seek only to address the requirements of satisfying the transparency data regulations and not add unnecessary complexity, duplication and cost by publishing data on the BMRS.</p> <p>SONI are strongly opposed to P295 Alternative solution A.</p>
TMA Data Management Ltd	<p><b>No</b></p>
EDF Energy	<p><b>Yes</b></p> <p>Practical aspects of the proposal highlight the distinction between the GB National Electricity Transmission System Operator ("Transmission Company" in the BSC)(NGET) and the Interconnector</p>

Respondent	Response
	<p>operators connected to the GB system, all of whom appear to be Transmission System Operators in the EU sense. This may be the first of many proposals driven by EU regulations related to "TSO"s for which the current BSC distinctions may not be ideally suited.</p>
<p>National Grid Interconnectors Ltd</p>	<p><b>Yes</b></p> <p>The publication of Interconnector data on BMRS as per Alternative A is above the requirements of the Transparency Guideline. The benefits of publishing Interconnector data on BMRS (in addition to the other sites where it is available) are not clear, when weighed against the cost and technical aspects of the implementation and operation.</p> <p>Decisions relating to the modification of IFA commercial systems are made jointly with NGIC's partner, Reseau de Transport d'Electricite (RTE). No discussions have taken place with RTE on the P295 proposals.</p> <p>The case for changes to IFA's existing auction systems are viewed in the context of the anticipated move to a single platform for auctioning cross border capacity, as set out in the draft Forwards Capacity Allocation network code. Single platform technical design, including its interfaces, will be the subject of multi-party agreement, and not just within the authority of GB I/C operators.</p>
<p>RWE Supply &amp; Trading GmbH</p>	<p><b>Yes</b></p> <p>BSC Parties need to be actively involved in the development and testing of the data requirements for Transparency data sent to National Grid and the method of transmission.</p>
<p>E.ON</p>	<p><b>No</b></p>