

## Stage 03: Draft Solution to Identify Impacts

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

# P295 'Submission and publication of Transparency regulation data via the BMRS'

The EU Transparency regulation requires primary data owners to submit information to their Transmission System Operator, or a third party acting as a data provider, for publication on a central European reporting platform. Arrangements to deliver the Transparency regulation must be implemented no later than 4 January 2015.

P295 proposes that ELEXON, through the BMRA, is made the GB data provider for all data that the GB Transmission Company (National Grid) is required to submit to the Electricity Market Fundamental Information Platform (EMFIP), with all of this data also being published on the BMRS.

This Impact Assessment for P295 closes:

**5pm on Friday 30 August 2013**

The Workgroup may not be able to consider late responses.

High Impact:



- Balancing Mechanism Reporting Agent (BMRA)
- Transmission Company
- Interconnector Administrators (*Alternative Solution A Only*)

Low Impact:



- ELEXON

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## About this Document

This document is the Draft Solution to Identify Impacts for P295. It summarises the proposed P295 solutions requirements developed by the P295 Workgroup, and summarises the changes - to the extent the group has been able to identify them - that will be required to participants' systems, BSC Central Systems, Code Subsidiary Documents and Configurable Items to implement each of the proposed solutions to P295.

We are issuing this document for impact assessment by BSC Agents (AM/Dev service provider and BPO/Host service provider), the Transmission Company, BSC Parties and Party Agents in order to establish the impacts, costs and lead times of P295 (including any impacts which are not identified in this document).

The P295 Workgroup will consider your responses at its next meeting. At this stage the Workgroup is not seeking your views on the pros or cons of P295, as these will be the subject of a subsequent industry consultation.

Please provide your response using the attached response form (Attachment B).

## Further Information

More information is available in:

Attachment **A**: Issue 47 Gap Analysis

Attachment **B**: Response Form

You can find further documentation and information on the [P295 page](#) of the ELEXON website.



### Any questions?

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## What is the Transparency regulation?

The regulation on submission and publication of data in electricity markets (the Transparency regulation) (Regulation (EU) No 543/2013)<sup>1</sup> is a legally binding EU regulation that came into force on 4 July 2013. Under this regulation, primary data owners will be required to submit a number of data items to their Transmission System Operator (TSO) (or to a third party acting as a data provider with the prior agreement of the TSO) for publication on a central information platform known as the Electricity Market Fundamental Information Platform (EMFIP). This platform will be operated by the European Network of Transmission System Operators for Electricity (ENTSO-E).

The Transparency regulation places obligations on TSOs, Distribution System Operators (DSOs), generators and large consumers to submit information for publication on the EMFIP. These participants will be required to submit additional data to that which is already submitted under the various GB industry requirements, the data that will be required under the regulation on wholesale energy markets integrity and transparency (REMIT) (Regulation (EU) No 1227/2011)<sup>2</sup> and the European Network Codes that are being developed under Article 6 of the regulation on conditions for access to the network for cross-border exchanges in electricity (Regulation (EC) No 714/2009)<sup>3</sup>. Under Article 5 of the Transparency regulation, ENTSO-E is currently developing a Manual of Procedures to set out the details and formats for the submission of data to the EMFIP, including standard submission methods and technical details that data providers must meet.

The Transparency regulation was published in the Official Journal of the European Union on 14 June 2013, and came into force on 4 July 2013, 20 days after publication. There is an 18 month implementation period commencing from this date to implement the arrangements that will deliver the Transparency regulation. This means that the arrangements delivering the Transparency regulation must be implemented no later than 4 January 2015.

## What is the BMRS?

The Balancing Mechanism Reporting Service (BMRS) is a service for publishing and reporting data relating to the Balancing Mechanism, Settlement and the market in general. This includes data provided by the Transmission Company relating to balancing actions and indicative data relating to Balancing and Settlement, including indicative data for each Settlement Period shortly after its completion. All of the data published on the BMRS is indicative data, calculated from the information available at the time, and is not used within Settlement, but its publication helps to facilitate the operation of the GB electricity market. Market participants can choose to receive the information via a 'high-grade' service, where the information is sent to them directly via a TIBCO feed, or they can use the 'low-grade' service, the BMRS website<sup>4</sup>. The low-grade service is freely available to anyone.

In a similar fashion to the data currently published on the BMRS, the information required under the Transparency regulation would not be used in Settlement. However, it may be beneficial to market participants if this additional information was made available alongside

<sup>1</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF>

<sup>2</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:326:0001:0016:EN:PDF>

<sup>3</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0015:0035:EN:PDF>

<sup>4</sup> <http://www.bmreports.com/>

the existing data published on the BMRS, allowing all of this information to be available from a single source.

## What discussions have already taken place?

### Issue 47

[Issue 47 'GB Implementation of the European Transparency Regulation'](#) was raised by National Grid in April 2013 in order to facilitate discussions on how the requirements of the Transparency regulation could be implemented within GB. The Issue 47 Group examined what data would be required to be reported under the Transparency regulation, how this data should be reported and what changes would be required to implement the relevant solution.

The Issue 47 Group came up with four potential solutions to the issue:

- 1) The Transmission Company would submit the data straight to the EMFIP. There are two sub-options to this solution relating to BMRS reporting:
  - a) No changes to BMRS reporting (which would result in no BSC impact); or
  - b) The BMRA would 'scrape' the additional data from the EMFIP and publish it on the BMRS.
- 2) The Transmission Company would submit the data to the BMRA, who would submit the data to the EMFIP and publish it on the BMRS. Interconnector data would be 'scraped' from the EMFIP and reported on the BMRS.
- 3) The Transmission Company would submit the data to the BMRA, who would submit the data to the EMFIP and publish it on the BMRS. In addition, Interconnectors would submit their data to the BMRA, who would publish this on the BMRS.
- 4) The Transmission Company would submit the data to the BMRA, who would submit the data to the EMFIP and publish it on the BMRS. In addition, the Interconnector Platform would submit Interconnector data to the BMRA, who would publish this on the BMRS.

Further detail on each solution is available within the Issue 47 Group's Issue Report<sup>5</sup>. The Issue 47 Group were unable to come to a conclusion as to which solution should be progressed, and recommended that all of these options be considered as part of any Modification that was raised to progress and implement the Transparency regulation arrangements.

P295 proposes to progress Solution 2 without the Interconnector data reporting element. However, as part of its consideration of P295, the P295 Workgroup have considered all of the options put forward under Issue 47 and have agreed to impact assess Solution 1a and Solution 4 as potential alternative solutions to P295.

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<sup>5</sup> The Issue 47 Report can be found on the [Issue 47 page](#) of the ELEXON website.

## Overlap with P291

[P291 'REMIT Inside Information Reporting Platform for GB Electricity'](#) was raised by SSE Energy Supply Ltd in January 2013. P291 seeks to implement a central reporting platform on the BMRS for the GB electricity market to report the information required under REMIT. During its discussions, the P291 Workgroup noted that much of the data required under the REMIT regulation in relation to outages would also be required under the Transparency regulation.

Although P291 was raised in response to the REMIT regulation, the P291 Workgroup developed the proposed solution to also cater for the requirements of the Transparency regulation. This should mean that only minor changes would be required to the P291 solution in order to adapt it for reporting the relevant information to the EMFIP under P295, such as renaming data items to align with the terminology used within the Transparency regulation. It should be noted that the P291 solution was made optional for BSC Parties, as there is no requirement under the REMIT regulation to use a central reporting platform, only a preference. The P295 Workgroup does not expect P295 to amend the P291 solution i.e. it would continue to remain optional for participants to publish REMIT messages on the BMRS. However, the relevant Grid Code flows would be updated to cater for both the P291 and P295 solutions, in order to provide the mandatory data required under the Transparency data, while offering the option to simultaneously submit a REMIT message to the BMRS should the participant so wish.

## What is the issue?

The Transmission Company and Interconnector TSOs are required to ensure that the data specified in the Transparency regulation is published on the EMFIP. The Proposer considers that it would be prudent to make ELEXON the data provider for this data under Article 4(2) of the Transparency regulation, as this would have a number of benefits highlighted below. However, there is currently no mechanism under the BSC that would allow ELEXON to assume this role of GB data provider.

The Proposer notes that some of the data required under the Transparency regulation is already submitted to ELEXON. Using ELEXON as the data provider would negate the need for creating a second data channel between the Transmission Company and the EMFIP for the same data. In addition, much of the data that the Transmission Company currently submits to ELEXON is published on the BMRS, so the additional data required under the Transparency regulation would be incremental to this, and would allow this data to be displayed in a format that is already accessible to BSC Parties. The Proposer also notes the synergies between the data required under the REMIT regulation and the Transparency regulation highlighted above.

The Proposer also notes that the BMRS has grown and evolved as a data publication platform to provide GB market participants with equal access to data, even when this data is not used within Settlement. In addition, making ELEXON the GB data provider would allow the data submitted via ELEXON under the Transparency regulation to fall under BSC governance, allowing BSC Parties to determine how much of this data should be published on the BMRS and the requirements for this.

## 2 Proposed Solutions

### Proposer's proposed solution

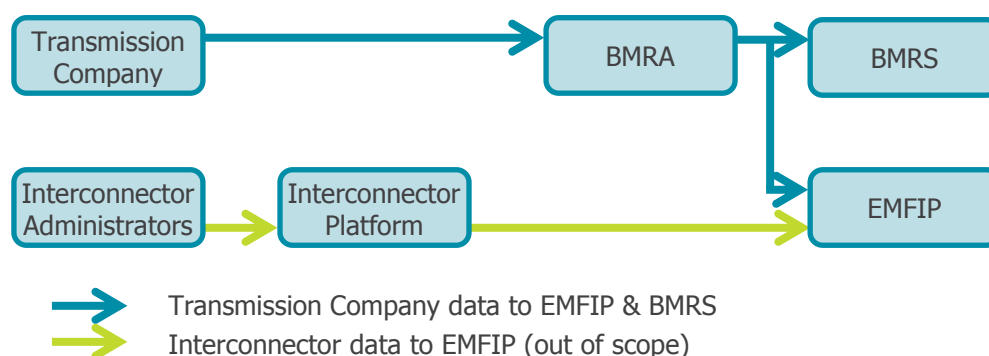
P295 proposes to amend the BSC so that ELEXON is made the GB data provider for all the information that the Transmission Company is required to submit to the EMFIP under the Transparency regulation. Under the proposed solution, the Transmission Company would submit the required data to the Balancing Mechanism Reporting Agent (BMRA). The BMRA would then submit the data to the EMFIP for publication.

The P295 Workgroup believes that it would be beneficial to the industry to publish all the required Transparency regulation data received by the Transmission Company on the BMRS. Therefore, the BMRA would also publish all of this information on the BMRS.

Some of the information currently submitted by the Transmission Company to the BMRA for BSC purposes would be required to be submitted to the EMFIP. For these data items, the BMRA would forward the information on to the EMFIP, and would continue to publish the information on the BMRS as it currently does.

It has been highlighted that there will be some duplication between the data currently being published and the data that will be added by P295. However it was agreed that rationalisation of the data is not within scope of P295 and would be facilitated by a separate Modification Proposal instead.

#### Proposed Solution



### Workgroup's alternative solutions

#### A) Extension of proposed solution to include Interconnector data

During its discussions on the GB implementation of the Transparency regulation, the Issue 47 Group came up with four potential solutions. One of the solutions put forward by the Group (Issue 47 - Solution 4) involved the Transmission Company submitting the required data to the BMRA, who would then submit it to the EMFIP and publish it on the BMRS, as per the P295 proposed solution.

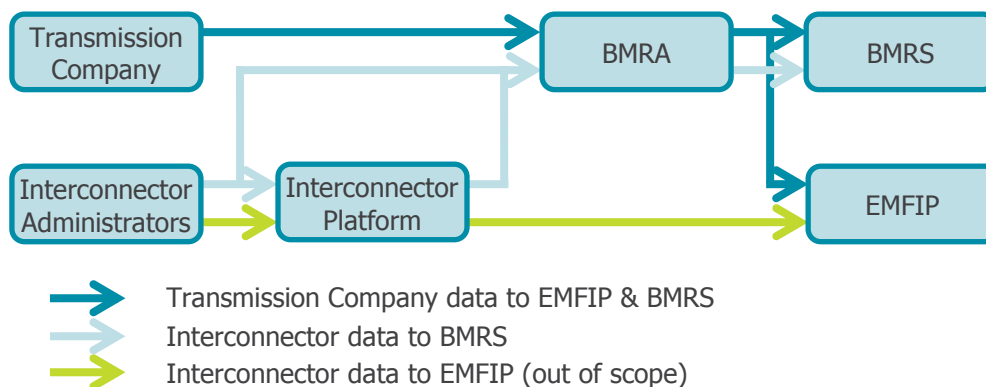
In addition to this, the Interconnector Platform (on behalf of Interconnector Administrators) would submit the required Interconnector Data to the BMRA, in parallel with submitting the data to the EMFIP. This data would then be published on the BMRS.

The Workgroup believes that expanding P295 to include the reporting of Interconnector Transparency regulation data on the BMRS would be beneficial to the industry. As all the required Transparency regulation data received by the Transmission Company as well as

the data Interconnector Administrators are required to submit to the EMFIP would be published in one place alongside the existing data already available on the BMRS. They believe that this solution would be the most efficient of the three solutions considered by the Issue 47 Group for publishing Interconnector data on the BMRS, and so elected to put it forward as a potential alternative solution for impact assessment.

Therefore, as an extension of the P295 proposed solution, alternative solution A proposes that Interconnector Administrators submit all Interconnector data that is deemed Transparency data to the BMRA, in parallel with submitting the data to the EMFIP. This data would then be published on the BMRS alongside the Transmission Company data. Interconnector Administrators may choose to submit this data individually or, more preferably, via the Interconnector Platform.

#### Alternative Solution A



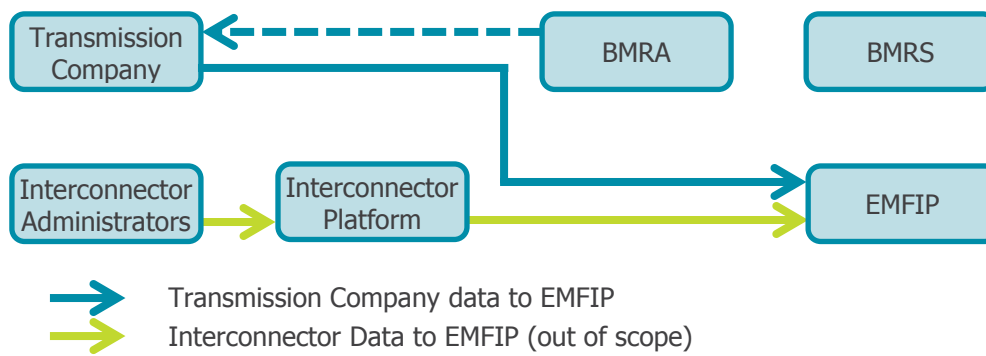
#### B) Transmission Company acts as data provider

The P295 Workgroup also considered the Issue 47 Group's solution 1a. This solution proposes that the Transmission Company, acting as the GB data provider, would submit the required data directly to the EMFIP. This solution would require the BMRA, who would act as a primary data owner, to submit required BSCCo Transparency data items (as detailed in Appendix 1) to the Transmission Company, to be forwarded onto the EMFIP for publication.

It should be noted that the defect identified by P295 is that there is currently no mechanism in place that would allow ELEXON to assume the role of GB data provider. Therefore, although this alternative solution has been considered by the Workgroup as part of the wider picture, members note that it would not fix the defect identified by P295, and so could not be put forward as a solution to this Modification. However, the Workgroup has deemed it prudent to impact assess this solution now on the basis that, if P295 is rejected, this approach would need to be implemented in order to ensure compliance under the Transparency regulation, as the BMRA would be considered a primary data owner and would therefore need to submit the required data to the Transmission Company. This would be a relatively minor change to the BSC, and by obtaining the costs, impacts and lead times now, any subsequent Modification raised to implement this approach could be progressed very quickly in the event that P295 is rejected.



## Alternative Solution B



## Implementation approach

On 14 June 2013, the Transparency regulation was published in the Official Journal of the European Union. The regulation came into force 20 days after publication on 4 July 2013, with an 18 month implementation period commencing from this date. This means that the arrangements delivering the Transparency regulation must be implemented no later than 4 January 2015.

It is recommended that P295 is targeted for implementation alongside P291<sup>6</sup> as the two Modifications will impact similar systems. This will allow for cost-savings to be achieved through parallel implementation; these will be identified during assessment. Although P291 will implement changes relating to REMIT, there is a significant amount of overlap between the information related to outages that is required under the REMIT regulation and that required under the Transparency regulation. Therefore, P295 will be targeted for implementation on 31 December 2014.

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<sup>6</sup> If approved, P291 will be implemented on 31 December 2014.



#### Who is likely to be impacted by P295?

The **proposed solution** and **alternative solution A** will impact the following participants in the BSC arrangements:

- The **Transmission Company**, who would need to submit the required Transparency regulation data to the BMRA.
- **Interconnector Administrators**, who would be impacted by alternative solution A only, which would require them to also submit their Transparency data to the BMRA for publication on the BMRS. They will be allowed to submit this data to the BMRA via the Interconnector Platform, and this would be the preferred method of submission. Otherwise, P295 is not expected to impact BSC Parties or Party Agents.
- **ELEXON**, who would need to register as a Data Provider under the Transparency regulation, as well as amending the relevant BSC documentation and managing the implementation of P295.
- **BSC Agents** (specifically the Balancing Mechanism Reporting Agent (BMRA)). We anticipate that the BSC Application Management and Development (AM/Dev) service provider would need to design and implement the required changes to the BMRA systems, including receipt and validation of the relevant data flows from the Transmission Company (and Interconnector Administrators or the Interconnector Platform under alternative solution A), creation of a data connection with the EMFIP and creation of the relevant sections of the BMRS to report the data. We anticipate that the Business Process Outsourcing/Host (BPO/Host) service provider would need to receive, validate and forward the relevant data flows and publish the information on the BMRS. In both cases, the relevant document changes and testing will be required.

**Alternative solution B** would impact the following participants in the BSC arrangements:

- The **Transmission Company**, who would need to receive the required Transparency regulation data from the BMRA.
- **ELEXON**, who would need to amend the relevant BSC documentation and manage the implementation of P295.
- **BSC Agents** (specifically the BMRA). We anticipate that the AM/Dev service provider would need to amend the BMRA systems to allow the submission of the relevant data to the Transmission Company. We anticipate that the BPO/Host service provider would then need to submit the relevant data to the Transmission Company to the agreed timescales. In both cases, the relevant document changes and testing will be required.

## What else is likely to be impacted by P295?

The proposed solution and alternative solution A will require changes to the BSC (particularly Sections Q, V and Annex X-1), and will require changes to BMRA System Documentation. For the purposes of this Impact Assessment, you should assume that the changes to the BSC will be drafted by the Workgroup, consulted on and agreed by the Panel as part of the P295 progression process before the Modification is sent to the Authority for decision. Any other impacted documents will be amended following Ofgem's approval of P295.

You can find a full list of the likely impacts in Section 5. Please highlight in your response if you believe there are any additional impacts not identified in this Draft Solution.

## What does this impact assessment seek?

This impact assessment seeks to identify the full impacts of the proposed solutions to P295. Where applicable, we seek separate information on the costs and lead time for all proposed solutions. Respondents to the industry impact assessment should respond using the accompanying impact assessment form.

We request that the AM/Dev and the BPO/Host service providers provide details of any cost savings and lead time reductions should P295 be implemented in parallel with P291 compared to the costs and lead times for implementing P295 as a standalone change.

The Workgroup also welcomes your views on which of the data items listed in Appendix 1 you believe should be reported on the BMRS, and whether there are any other potential solutions that you believe the Workgroup should consider. At this stage the Workgroup is not seeking your views on the pros or cons of P295, as these will be the subject of the Workgroup's subsequent Assessment Procedure Consultation.

## 4 Detailed Solution Requirements

### Solution requirements

The Workgroup has identified the following solution requirements for P295.

The proposed solution will consist of Requirements 1-5 only, with alternative solution A consisting of Requirements 1-6. Alternative solution B will only consist of Requirement 7. This solution will be impact assessed on the basis that it would not be a solution to P295 but that, if P295 is rejected, it would be the most suitable solution for ensuring compliance under the Transparency regulation and would be progressed through a separate Modification.

Solution	Req. 1	Req. 2	Req. 3	Req. 4	Req. 5	Req. 6	Req. 7
Proposed Solution	✓	✓	✓	✓	✓		
Alternative Solution A	✓	✓	✓	✓	✓	✓	
Alternative Solution B							✓

### Solution requirements for the proposed solution

The proposed solution will consist of the below Requirements 1-5 only.

#### Requirement 1

The BSCCo will register as a Transparency regulation Data Provider

- |     |   |
|-----|---|
| 1.1 | The BSCCo must register as a data provider according to the stated procedure in Chapter 6 of the Manual of Procedures <sup>7</sup> for the EMFIP. |
| 1.2 | The BSCCo will need to successfully complete this process prior to the Implementation Date for P295.  |
| 1.3 | Registration for the role of Data Provider must allow for these obligations to be discharged by the BMRA.   |

#### Requirement 2

The Transmission Company will submit all Transparency data to the BMRA

- |     |  |
|-----|--|
| 2.1 | The Transmission Company will provide the data items listed in Table 1 of Appendix 1 to the BMRA (BPO/Host service provider). This data will be deemed Transparency data for the purposes of this Impact Assessment.   |
| 2.2 | The Transmission Company will provide the required Transparency data within the timescales set out in Table 1 of Appendix 1.   |
| 2.3 | All data will be passed using the existing FTP data connection between the Transmission Company and BMRA systems.  |
| 2.4 | The data flows will be provided as XML files in the format specified by ENTSO-E. Where possible, data items should be merged into existing flows, although this will be possible for only a few such data items. It is anticipated that the remaining data items will form around 25-30 new flows. |

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<sup>7</sup> <https://www.entsoe.eu/consultations/document/docdetails.do?uid=0004-e512-3a1f-835c-95e3&>

## Requirement 2

2.5	The BMRA (BPO/Host service provider) will validate the data upon receipt. The validation rules for this data will, as a minimum, involve ensuring that the file structure is correct. For the avoidance of doubt, the BMRA will not be required to ensure that the data itself is correct.
2.6	Any Transparency data submitted by the Transmission Company that is not already submitted under the existing BSC arrangements will not be used in Settlement but will be received by the BMRA solely for publication on the BMRS and submission to the EMFIP.

## Requirement 3

The BMRA will submit all Transparency data received by the Transmission Company to the EMFIP

3.1	The BMRA (BPO/Host service provider) will submit all Transparency data received from the Transmission Company on to ENTSO-E for publication on the EMFIP.
3.2	The BMRA (BPO/Host service provider) will submit this data to the EMFIP as soon as technically possible, but with a delay of no more than one minute of receipt from the Transmission Company.
3.3	All data will be passed using a new data connection between the BMRA systems and the EMFIP. This data connection will need to be available at all times. The requirements for this data connection will need to comply with the relevant requirements contained in the Manual of Procedures, and the BMRA (AM/Dev service provider) should select the most appropriate method (connection via Web Services or MADES with both meeting technical specification prescribed by ENTSO-E) based on cost, security and reliability.

## Requirement 4

The BMRA will publish all Transparency data received by the Transmission Company on the BMRS

4.1	The BMRA (BPO/Host service provider) will publish all Transparency data received from the Transmission Company on the BMRS.
4.2	The BMRA (BPO/Host service provider) will publish this data on the BMRS as soon as technically possible following receipt from the Transmission Company.
4.3	The exact positioning and presentation of the data will be determined during Workgroup discussions. However, the Transparency data will be published on a new Transparency page or section (if multiple pages are required), which will be placed under the 'General' tab of the BMRS navigation menu. For the purpose of this Impact Assessment the AM/Dev service provider should assume that all data items will be published in tabular form.
4.4	All Transparency data will be made available through the BMRS in line with the requirements for existing data published through the BMRS. It will be made freely available to all participants via the Low Grade service, and will be made available through the High Grade service for those participants who have subscribed to this service.
4.5	The BMRS will be required to display Transparency data for a period aligned with existing practice.

#### Requirement 4

4.6	All Transparency data will be archived, and will be kept for a period of at least five years, to align with the time period specified in the Transparency regulation.
4.7	All archived Transparency data will be available to participants upon receipt of a request through the BSC Service Desk.
4.8	The 'Help' section of the BMRS will be updated to provide information on all Transparency data items that are published on the BMRS.
4.9	SLAs around the availability of Transparency data on the BMRS will be aligned with the existing SLAs around availability of data on the BMRS.

#### Requirement 5

The BMRA will submit all Transparency data originating from BSC systems to the EMFIP

5.1	The BMRA (BPO/Host service provider) will submit the data items listed in Table 2 of Appendix 1 to the EMFIP. This data will be deemed Transparency data for the purposes of this Impact Assessment
5.2	The BMRA (BPO/Host service provider) will submit this data to the EMFIP within the timescales set out in Table 2 of Appendix 1.
5.3	All data will be passed using the new data connection between the BMRA systems and the EMFIP established under Requirement 3, in the format specified by ENTSO-E.
5.4	For the purposes of Requirement 4, references to the publication of Transparency data from the Transmission Company will apply also to the publication of Transparency data owned by BSCCo, for any data items that are not already published on the BMRS.

### Solution requirements for alternative solution A

Alternative solution A will consist of Requirements 1-5 above supplemented with the below Requirement 6.

#### Requirement 6

The Interconnector Administrators will submit all Interconnector data that is deemed Transparency data to the BMRA, in parallel with submitting the data to the EMFIP

6.1	Interconnector Administrators will provide the data items listed in Table 3 of Appendix 1 to the BMRA (BPO/Host service provider). Interconnector Administrators may choose to provide this data via the Interconnector Platform – this is the preferred option for receipt of data by the BMRA. This data will be deemed Transparency data for the purposes of this Impact Assessment.
6.2	The Interconnector Administrators provide the required Transparency data within the timescales set out in Table 3 of Appendix 1.

## Requirement 6

6.3	<p>All data will be passed using a new data connection between Interconnector Administrators or the Interconnector Platform and BMRA systems. The requirements for this data connection will need to be determined, and will depend on the submitting systems and method, but is anticipated to be an FTP connection.</p> <p>For the purpose of this Impact Assessment, the AM/Dev service provider should assume there will only be a single link between the BMRA systems and the Interconnector Platform, but is requested to note any cost increases for additional data links with individual Interconnector Administrators.</p>
6.4	<p>The BMRA (BPO/Host service provider) will validate the data upon receipt. The validation rules for this data will, as a minimum, involve ensuring that the file structure is correct. For the avoidance of doubt, the BMRA will not be required to ensure that the data itself is correct.</p>
6.5	<p>The Transparency data submitted by the Interconnector Administrators or Interconnector Platform will not be used in Settlement but will be received by the BMRA solely for publication on the BMRS.</p>
6.6	<p>For the purposes of Requirement 3, the Transparency data submitted by the Interconnector Administrators or the Interconnector Platform will not be submitted to the EMFIP by the BMRA (BPO/Host service provider), as this will be submitted to the EMFIP by the Interconnector Platform.</p>
6.7	<p>For the purposes of Requirement 4, references to the receipt and publication of Transparency data from the Transmission Company will apply also to the receipt and publication of Transparency data from Interconnector Administrators or the Interconnector Platform.</p>

## Solution requirements for alternative solution B

Alternative solution B will consist of the below Requirement 7 only.

## Requirement 7

The BMRA, acting as a primary data owner, will submit the required data items to the Transmission Company

7.1	<p>The BMRA (BPO/Host service provider) will provide the data items listed in Table 2 of Appendix 1 to the Transmission Company. This data will be deemed Transparency data for the purposes of this Impact Assessment.</p>
7.2	<p>The BMRA (BPO/Host service provider) will provide the required Transparency data within the timescales set out in Table 2 of Appendix 1.</p>
7.3	<p>All data will be passed using the existing FTP data connection between the BMRA systems and the Transmission Company in a format to be agreed between the BMRA (AM/Dev service provider) and the Transmission Company.</p>

### P295 Impacts

#### Impact on BSC Systems and Process

BSC System/Process	Potential impact
BMRA/BMRS	<p>Under the proposed solution and alternative solution A, the BMRA will be required to forward the data it receives from the Transmission Company to the EMFIP and publish it on the BMRS.</p> <p>Alternative solution A will also require the BMRA to publish Interconnector data on the BMRS.</p> <p>Alternative solution B will require the BMRA to forward applicable BSCCo data items to the Transmission Company.</p>

#### Impact on BSC Parties and Party Agents

Alternative solution A will require Interconnector Administrators to also provide Transparency data to the BMRA, which may impact the Interconnector Platform. No impact is anticipated on any other BSC Parties or Party Agents under this solution. No impact is anticipated on any BSC Parties or Party Agents under the proposed solution or alternative solution B.

#### Impact on Transmission Company

The Transmission Company will be required to provide the data required under the Transparency regulation to the BMRA.

#### Impact on ELEXON

Area of ELEXON	Potential impact
Release Management	ELEXON will manage the implementation project.

#### Impact on Code

Code Section	Potential impact
Section Q	Changes will be required to implement the solutions.
Section V	
Section X Annex X-1	

#### Impact on Code Subsidiary Documents

CSD	Potential impact
BMRA Service Description	Changes will be required to implement the solutions.



Impact on other Configurable Items	
Configurable Item	Potential impact
BMRA User Requirements Specification	Changes will be required to implement the solutions.
NETA Interface Definition Document	

## Appendix 1: Data items required under the Transparency regulation

### Transparency regulation data items

The tables below summarise the data items that are required to be submitted to the EMFIP under the Transparency regulation. These data items have been split based on whether they will be submitted by the Transmission Company, BSCCo or Interconnector Administrators.

The Item number against each data item refers to the relevant number used in the Issue 47 Gap Analysis, which is available in Attachment A to this Impact Assessment.

### Transmission Company data items

Table 1: Transmission Company Data Items

Item	EREG Title	Data Items Under BMRS	BSC Reference	Regulation Reference	Publication Timescales
01	ACTUAL TOTAL LOAD PER BIDDING ZONE	Initial Demand Out-turn	Q6.1.13 - Initial National Demand Out-Turn	A6 1a	One hour after the Operating Period
02	DAY-AHEAD TOTAL LOAD FORECAST PER BIDDING ZONE	Current Day and Day Ahead Updated Market Information	Q6.1.5 - National Demand forecast	A6 1b	Two hours before gate closure
03	WEEK-AHEAD TOTAL LOAD FORECAST PER BIDDING ZONE	2-14 days ahead (NDFD) National demand (Transmission System) forecast	Q6.1.3 - National Demand forecast	A6 1c	Each Friday, Two hours before gate closure
04	MONTH-AHEAD TOTAL LOAD FORECAST PER BIDDING ZONE	2-52 weeks ahead (NDFW) National demand forecast	Q6.1.2(a)	A6 1d	One week before the delivery month
		2-52 weeks ahead (TSDFW) Transmission System demand forecast	Q6.1.2(b)		

Table 1: Transmission Company Data Items

Item	ERGEG Title	Data Items Under BMRS	BSC Reference	Regulation Reference	Publication Timescales
05	YEAR-AHEAD TOTAL LOAD FORECAST PER BIDDING ZONE	2-52 weeks ahead (NDFW) National demand forecast  2-52 weeks ahead (TSDFW) Transmission System demand forecast	Q6.1.2(a)  Q6.1.2(b)	A6 1e	15th of the month before the year to which the data refers to
06	PLANNED UNAVAILABILITY OF CONSUMPTION UNITS	BM Unit Physical Data	Q6.1.10	A7 1a	One hour after decision regarding planned unavailability
07	CHANGES IN ACTUAL AVAILABILITY OF CONSUMPTION UNITS	BM Unit Physical Data	Q6.1.10	A7 1b	One hour after decision regarding planned unavailability
08	YEAR-AHEAD FORECAST MARGIN	2-52 weeks ahead National Generating Plant Demand Margin	6.1.2 (d) - Generating Plant Demand Margin forecast	A8 1	15th of the month before the year
09	EXPANSION AND DISMANTLING PROJECTS	n/a	n/a	A9 1	One week before the yearly capacity auction, but no later than December 15th at 2400 local time.
10	PLANNED UNAVAILABILITY IN THE TRANSMISSION GRID	n/a	n/a	A10 1a	-

Table 1: Transmission Company Data Items

Item	ERGEG Title	Data Items Under BMRS	BSC Reference	Regulation Reference	Publication Timescales
11	CHANGES IN ACTUAL AVAILABILITY IN THE TRANSMISSION GRID	n/a	n/a	A10 1b	-
12	CHANGES IN ACTUAL AVAILABILITY OF OFF-SHORE GRID INFRASTRUCTURE	n/a	n/a	A10 1c	-
33	REDISPATCHING	n/a	n/a	A13 1a	-
34	COUNTERTRADING	n/a	n/a	A13 1b	-
35	INSTALLED GENERATION CAPACITY AGGREGATED	n/a	n/a	A14 1a	One week before the beginning of the year
36	INSTALLED GENERATION CAPACITY PER UNIT	n/a	V4.2.3	A14 1b	One week before the beginning of the year
37	DAY AHEAD AGGREGATED GENERATION	Initial National Day ahead Indicated Generation (INDGEN)	Q6.1.6 (c)	A14 1c	18:00, One day before actual delivery
38	DAY AHEAD GENERATION FORECASTS FOR WIND AND SOLAR	Summary Page Wind Forecast	Q6.1.17	A14 1d	18:00, One day before actual delivery
39	PLANNED UNAVAILABILITY OF GENERATION UNITS	Total output usable (By Fuel Type and BM Unit)  Maximum Export Limit	6.1.4 c) Output Usable by BM units  Q6.1.10	A15 1a	One hour after the decision regarding the planned unavailability

Table 1: Transmission Company Data Items

Item	ERREG Title	Data Items Under BMRS	BSC Reference	Regulation Reference	Publication Timescales
40	CHANGES IN ACTUAL AVAILABILITY OF GENERATION UNITS	Maximum Export Limit	Q6.1.10	A15 1b	One hour after the change
41	PLANNED UNAVAILABILITY OF PRODUCTION UNITS	Total output usable (By Fuel Type and BM Unit)	6.1.4 c) Output Usable by BM units	A15 1c	One hour after the decision regarding the planned unavailability
		Maximum Export Limit	Q6.1.10		
42	CHANGES IN ACTUAL AVAILABILITY OF PRODUCTION UNITS	Maximum Export Limit	Q6.1.10	A15 1d	One hour after the decision regarding the planned unavailability
45*	AGGREGATED FILLING RATE OF WATER RESERVOIRS AND HYDRO STORAGE PLANTS	n/a	n/a	A16 1d	Third working day of the following week
46	RULES ON BALANCING	n/a	n/a	A17 1a	-
47	CONTRACTED BALANCING RESERVES	n/a	n/a	A17 1b	Two hours before the next procurement
48	PRICES OF PROCURED BALANCING RESERVES	n/a	n/a	A17 1c	One hour after the procurement process
49	ACCEPTED AGGREGATED OFFERS	Market Depth	Q6.1.11 - Bid-Offer Data	A17 1d	One hour after the operating period

Table 1: Transmission Company Data Items

Item	ERGEG Title	Data Items Under BMRS	BSC Reference	Regulation Reference	Publication Timescales
50	ACTIVATED BALANCING ENERGY	Market Activity / Non-BM Instructed Volumes	Q6.1.12 (Bid Offer Acceptances) and Q6.1.22 (Non-BM STOR Instructed Volume)	A17 1e	30 minutes after the operating period
51	PRICES OF ACTIVATED BALANCING ENERGY	Market Activity	Q6.1.12 - Bid Offer Acceptances	A17 1f	One hour after the operating period
54	FINANCIAL EXPENSES AND INCOME FOR BALANCING	n/a	Annex V-1, Table 2, SAA reporting	A17 1i	Three months after the operating period
55	CROSS-BORDER BALANCING – VOLUMES OF EXCHANGED BIDS AND OFFERS	n/a	n/a	A17 1j	One hour after the operating period
56	CROSS-BORDER BALANCING - PRICES	SO-SO trades	n/a	A17 1j	One hour after the operating period
57	CROSS-BORDER BALANCING ENERGY ACTIVATED	n/a	n/a	A17 1j	One hour after the operating period

\* Data item 45 is not required for GB reporting.

## BSCCo data items

Table 2: BSCCo Data Items

Item	ERGEG Title	Data Items Under BMRS	BSC Reference	Regulation Reference	Publication Timescales
43	ACTUAL GENERATION OUTPUT PER GENERATION UNIT	n/a	Annex V-1, Table 2, SAA reporting	A16 1a	Five days after the end of the MTU period

Table 2: BSCCo Data Items

Item	ERGEG Title	Data Items Under BMRS	BSC Reference	Regulation Reference	Publication Timescales
44	ACTUAL AGGREGATED GENERATION PER TYPE	Summary Page - Generation by Fuel Type, Wind forecast out-turn	Q6.1.19	A16 1b, 1c	One hour after the operational period
52	IMBALANCE PRICES	System Prices	V2.6.5 - Indicative System Buy Price & Indicative System Sell Price	A17 1g	Two hours after the end of the time interval
53	AGGREGATED IMBALANCE VOLUMES	System Prices	V2.6.5 - Indicative Net Imbalance Volume	A17 1h	30 minutes after the operating period

### Interconnector data items

Table 3: Interconnector Administrator Data Items

Item	ERGEG Title	Data Items Under BMRS	BSC Reference	Regulation Reference	Publication Timescales
10	PLANNED UNAVAILABILITY IN THE TRANSMISSION GRID	n/a	n/a	A10 1a	-
11	CHANGES IN ACTUAL AVAILABILITY IN THE TRANSMISSION GRID	n/a	n/a	A10 1b	-
13	OFFERED DAY-AHEAD TRANSFER CAPACITY	n/a	n/a	A11 1a	-
14	OFFERED DAY-AHEAD CAPACITY IN IMPLICIT TRANSMISSION AUCTIONS	n/a	n/a	A11 1b	-



Table 3: Interconnector Administrator Data Items

Item	ERGEG Title	Data Items Under BMRS	BSC Reference	Regulation Reference	Publication Timescales
15	OFFERED DAY-AHEAD TRANSFER CAPACITY	n/a	n/a	A11 2	One hour before the end of the bidding period for the day-ahead auction
16	FORECASTED AND OFFERED WEEK-AHEAD TRANSFER CAPACITIES	n/a	n/a	A11 2	Friday of the week before the auction's delivery period
17	FORECASTED AND OFFERED MONTH-AHEAD TRANSFER CAPACITIES	n/a	n/a	A11 2	Two working days (D-2) before the associated monthly explicit auction bidding period.
18	FORECASTED AND OFFERED YEAR-AHEAD TRANSFER CAPACITIES	n/a	n/a	A11 2	One week (W-1) before the associated yearly auction bidding period
19	Offered INTRADAY TRANSFER CAPACITY	n/a	n/a	A11 2	-
20	CROSS-BORDER CAPACITY FOR DC LINKS – RAMPING RESTRICTIONS	n/a	n/a	A11 3	-
21	CROSS-BORDER CAPACITY FOR DC LINKS – INTRADAY TRANSFER LIMITS	n/a	n/a	A11 3	-
22	CRITICAL NETWORK ELEMENTS	n/a	n/a	A11 4	-

Table 3: Interconnector Administrator Data Items

Item	ERGEG Title	Data Items Under BMRS	BSC Reference	Regulation Reference	Publication Timescales
23	EXPLICIT AUCTIONS – USE OF THE TRANSMISSION CAPACITY	n/a	n/a	A12 1a	One hour after the action has taken place
24	EXPLICIT AUCTIONS – AUCTION REVENUE	n/a	n/a	A12 1a	One hour after the action has taken place
25	TOTAL CAPACITY NOMINATED	n/a	n/a	A12 1b	One hour after the day-ahead cut-off time
26	TOTAL CAPACITY ALREADY ALLOCATED	n/a	n/a	A12 1c	One hour after the action has taken place
27	DAY-AHEAD PRICES	n/a	n/a	A12 1d	One hour after the action has taken place
28	IMPLICIT AUCTIONS – NET POSITIONS	n/a	n/a	A12 1e	-
29	IMPLICIT AUCTIONS – CONGESTION INCOME	n/a	n/a	A12 1e	-
30	SCHEDULED DAY-AHEAD COMMERCIAL EXCHANGES	n/a	n/a	A12 1f	One hour after last cut off time
31	PHYSICAL FLOWS	Out-turn Interconnector flows	Q6.1.19	A12 1g	One hour (H+1) after the end of the MTU Period.
32	TRANSFER CAPACITIES ALLOCATED WITH THIRD COUNTRIES	n/a	n/a	A12 1h	-