Final Modification Report

P315 'Publication of Gross Supplier Market Share Data'

P315 aims to increase transparency of Suppliers' Metered Volumes and MPAN counts to give industry participants more equal access to basic market share information.

Under P315, Suppliers' market share would be reported (unless it is below a defined threshold in both the domestic and non-domestic sectors) and the existing non-Supplier specific GSP Group consumption total information would be made more widely available.

In addition the Alternative Modification would make available some historical GSP Group consumption totals information and some Supplier-specific information in an aggregated form.

The BSC Panel recommends **approval** of the P315 Alternative Modification and **rejection** of the P315 Proposed Modification

This Modification is expected to impact:

- Suppliers
- ELEXON

ELEXON

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

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About This Document

This is the P315 Final Modification Report, which ELEXON has submitted to the Authority on behalf of the BSC Panel. It includes the Workgroup's assessment, the Panel's views and the responses to both the Workgroup's final Assessment Consultation and the Panel's Report Phase Consultation. The Authority will consider this report and will decide whether to approve or reject P315.

There are five parts to this document:

- The main document details the solution, impacts, costs, benefits/drawbacks and implementation approach. It sets out the Workgroup's views on the areas in its Terms of Reference, the Workgroup membership and Terms of Reference.
- Attachments A and B contain the draft redlined changes to the BSC for the P315 Proposed and Alternative Modifications.
- Attachment C contains the full responses to the final Assessment Procedure Consultation (see P315 webpage for responses to previous consultations).
- Attachment D contains the full responses to the Panel's Report Phase Consultation.

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1 Summary

Why Change?

The Proposer believes that the Supplier Metered Volume data that is currently available to the market participants does not provide sufficient transparency for interested parties (including prospective new entrants) to understand Suppliers' market shares in the retail and embedded generation markets. P315 'Publication of Gross Supplier Market Share Data' proposes that more granular Supplier market share data should be made available to improve market transparency and promote effective competition.

Proposed Modification Solution

The Proposed Modification solution consists of two parts:

- **Publication of Supplier Market Share Summary Data**

  ELEXON shall publish a quarterly summary of each Supplier's market share by volume and average MPAN count on the ELEXON website. The data should be drawn from the First Reconciliation Volume Allocation (R1) Run and would be reported on a national level and across a set of Supplier Consumption Reporting Groups[1].

  Data relating to Suppliers with a small market share (i.e. below the reporting thresholds as described in Section 3) in both domestic and non-domestic markets shall not be published individually. Instead, these Suppliers' data would be grouped together with other such Suppliers and reported as a single anonymous entity called 'Other Suppliers'.

- **Publication of D0276 'GSP Group Consumption Totals Report' data as P0276[2]**

  The P0276 data shall contain the total consumption volume and MPAN count by Consumption Component Class (CCC) for each GSP Group. This report reveals no Supplier specific data or data relating to Suppliers' market shares within a GSP Group.

  D0276 data is currently made available over the Data Transfer Network (DTN) to BSC Parties active in the Supplier Volume Allocation (SVA) arrangements. However this data is not available to BSC Parties who participate only in the Central Volume Allocation (CVA) market, to the Transmission Company or to any potential market entrants.

  ELEXON shall publish the P0276 data flow daily for Settlement Final (SF), Final Reconciliation Volume Allocation (RF) and where available, Dispute Final (DF) Settlement Runs on the ELEXON Portal, from the P315 Implementation Date. ELEXON shall make this available to the Transmission Company and all BSC Parties. Non-BSC Parties can access this data under a licensing agreement.

[1] Supplier Consumption Reporting Groups were referred as Aggregate Consumption Component Classes (ACCCs) in the previous P315 Assessment Report. They have been renamed for the avoidance of technical contradiction between Consumption Component Class and Profile Class. Supplier Consumption Reporting Groups are defined in Annex 1.

[2] P0276 would contain the same data as D0276 'GSP Group Consumption Totals Report'. However the flow was renamed to clarify that this data would be published on the ELEXON Portal rather than transmitted through Data Transfer Network.

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Alternative Modification Solution

The Alternative Modification solution contains three parts:

- **Publication of Supplier Market Share Summary Data** (same requirements as the Proposed Modification)

- **Publication of P0276 data**

  The Alternative Modification contains the same requirements as the Proposed Modification and in addition, would make two years' historical P0276 available upon implementation. This means that as well as providing new P0276 data from the Implementation Date going forward, historical P0276 data (up to two years before the Implementation Date) would also be made available.

- **Publication of GSP Group Market Matrix Report**

  The GSP Group Market Matrix Report would contain GSP Group consumption data by Profile Class (PC), Standard Settlement Configuration (SSC), Line Loss Factor Class (LLFC), Distributor and Time Pattern Regime (TPR). This report shall be created by summing D0082 'Supplier Purchase Matrix Report' across all Suppliers and Data Aggregators, resulting in a single consumption report per GSP Group. This report will not contain any Supplier level data or data that could be used to derive the market share of Suppliers.

  ELEXON shall publish the new GSP Group Market Matrix Report daily for all Settlement Run Types on the ELEXON Portal. This report will be available to BSC Parties and to non-BSC Parties under a licensing agreement.

Impacts & Costs

There would be no direct impact on BSC Parties to implement P315. The central implementation costs for ELEXON would be approximately £80k and £104k to implement the Proposed Modification and Alternative Modification respectively.

Implementation

The BSC Panel initially recommends following Implementation Dates:

- 30 June 2016, if the Authority's decision is received on or before 22 October 2015; or

- 3 November 2016 if the Authority's decision is received after 22 October 2015 but on or before 25 February 2016.

Recommendation

The BSC Panel believes, by majority, that both the Proposed and Alternative Modifications better facilitate Applicable BSC Objectives (b) and (c) compared with the baseline and that the Alternative Modification is better than the Proposed Modification.

The BSC Panel therefore recommends that the P315 Alternative Modification should be approved.

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2 Why Change?

The P315 Proposer contends that Suppliers' Metered Volume data that is currently published does not provide sufficient transparency for all BSC Parties or other interested parties to understand the market shares in the electricity retail market.

The Proposer believes that, in order to help all parties to understand the gross Supplier market shares, Suppliers' Meter Volume should be published, and that the volumes to be published should be gross (i.e. be separated out from embedded generation) and be broken down by Supplier name, customer type, Active Export/Active Import and Half Hourly (HH)/Non Half Hourly (NHH).

In order to create the right balance between improving market transparency and protecting the growth of small market participants in their niche markets, the Proposer believes that small Suppliers with low market shares in both domestic and non-domestic markets should be anonymised in the P315 reporting.

P315 contends that publishing the data would be in the interests of transparency and competition, would aid the validation of Settlement data and would help the Transmission Company balance the system[3].

What is currently published?

SAA-I014 Settlement Reports

The SAA-I014 reports Supplier Metered Volume, i.e. the net of import and export Metering Point Administration Numbers (MPANs) for all PCs including line losses. The process of netting off export volumes means that gross Supplier consumption can be 'masked' by embedded generation within the same Supplier Balancing Mechanism Unit (BMU). With an increasing volume of embedded generation this effect will increase.

Different versions (sub flows) of the SAA-I014 contain different information and are currently sent to, or available to, different participants.

1. **Individual BSC Party version (SAA-I0141)**

   Each BSC Party receives the SAA-I0141 containing only their data.

2. **System Operator version (SAA-I0142)**

   BSC Parties and non BSC Parties who have purchased a data licence from ELEXON can request the SAA-I0142 containing all BSC Parties' data.

3. **BSCCo version (SAA-I0143)**

   BSCCo receives the SAA-I0143 which contains a subset of data from SAA-I0142 and this data flow is available to BSCCo only.

D0276 GSP Group Consumption Totals Report

Suppliers also receive Data Transfer Catalogue (DTC) data flow D0276 which reports volumes and MPAN counts for each CCC within a GSP Group. However, this data flow does

[3] The Modification solution would provide gross Supplier Volume with Supplier BMU embedded generation separated out. The Transmission Company, in their Assessment Consultation response, states that this data would be beneficial for its demand forecasting and charge setting activities.

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not provide visibility of volumes broken down by PC within CCCs associated with NHH Active Import. This limitation means that Parties are not be able to see the volumes consumed by different types of customers, which are typically differentiated by PC. The D0276 is also restricted to BSC Parties that participate in the SVA arrangements.

What is the issue?

The Proposer believes that neither the SAA-I014 nor D0276 provide sufficient transparency to allow all BSC Parties and other interested parties (such as potential new entrants) to understand Suppliers' gross consumption within the retail market, nor is it presented in a user friendly format. The Proposer believes such transparency should exist in order to enable Parties and potential new market entrants to understand the market shares for each market participant.

Currently, third parties perform surveys to establish market share and sell this information to industry stakeholders. The Proposer understands that there have been cases where gross market share information has been released with Suppliers' consent in response to Freedom of Information Requests to Ofgem and he believes that there is no issue in principle with this information being made available to industry in basic form, without Parties having to incur extra costs.

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3 Proposed Solution

Proposed Modification Solution

The Proposed Modification solution consists of two parts:

- **Publication of Supplier Market Share Summary Data**

  ELEXON shall publish a quarterly summary of each Supplier's market share by volume and average MPAN count on the ELEXON website. The data would be reported:

  - Across a set of Supplier Consumption Reporting Groups introduced by P315 and would use data from the R1 Run ; and
  - At a national level only, i.e. not broken down by GSP Group.

  However, data relating to any Suppliers considered to have a small market share would not be published individually. Suppliers with a market share that falls below both a defined domestic MPAN count threshold and a defined non-domestic consumption volume threshold[4] would be aggregated together and reported as 'Other Suppliers' across each of the Supplier Consumption Reporting Groups in the report. Therefore, a Supplier would only be identified and have its data reported individually if it has either (or both):

  - An average number of PC1-2 MPANs over the reporting quarter of 250,000 or more; or
  - An aggregated consumption volume across PC3-8 and Half Hourly (HH) customers over the reporting quarter of 500GWh or more.

  These thresholds equate approximately to a 1% share of the respective domestic and non-domestic markets.

- **Publication of D0276 'GSP Group Consumption Totals Report' data as P0276**

  ELEXON shall publish the daily P0276 data flow for SF and RF Settlement Runs (where DF Run data is available, RF Run data shall be replaced by DF Run data) from the P315 Implementation Date going forward on the ELEXON Portal and make this available to the Transmission Company and all BSC Parties. Non-BSC Parties can access this data under a licensing agreement.

  This data shall be held on the ELEXON Portal for a maximum period of time within the storage constraints. When the storage limit is reached, the oldest P0276 data shall be archived onto DVDs on a rolling basis. This Portal and DVD archive combined approach shall ensure that BSC Parties and licensees have access to the latest two years' P0276 data[5].

[4] The market share in domestic sector is determined by the number PC1-2 MPANs registered under each Supplier; and the market share in non-domestic sector is determined by the energy volume supplied to non-domestic customers by a Supplier. This approach is consistent with Ofgem's approach used in its 'State of Market Assessment' report.

[5] Under the Proposed Modification, P0276 data will only be produced from the Implementation Date onwards. Therefore the two year archiving period would only be reached two years after the Implementation Date. (I.e. a full two years' P0276 data would only be available by then).

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ELEXON or its service provider would provide archive data DVDs to Parties and data licensees upon request.

P315 Proposed Modification solution requirements

Requirement 1	
Publish quarterly data on Supplier volumes and MPAN counts on the ELEXON website.	
1.1	For each calendar quarter (January - March, April - June, etc.) the Supplier Volume Allocation Agent (SVAA) will determine and produce the 'Supplier Quarterly Consumption Report', containing: • Quarterly aggregated Supplier volumes in MWh by Supplier Consumption Reporting Groups; and • Quarterly averaged Supplier MPAN counts by Supplier Consumption Reporting Groups for each Supplier at a GB level, using R1 data. This data will be sent to ELEXON after all the relevant R1 Runs have been completed by the SVAA.
1.2	ELEXON will group Suppliers IDs into Supplier Party name as necessary across the relevant Supplier Consumption Reporting Groups. The following threshold criteria will be applied to the information determined after the grouping of Supplier IDs: • For non-domestic market segment (all PC3-4, PC5-8 and HH import) a volume threshold of 500GWh; and • For domestic market segment (PC1-2) an MPAN count threshold 250,000. A Supplier below **both** the criteria values is considered to be below the publication threshold (i.e. a Supplier's data would be published if it is above either threshold). ELEXON will produce the Supplier quarterly market share summary by adding CVA import volumes, derived from the SAA-I0143 report, to the quarterly Supplier volumes for each Supplier.
1.3	The Supplier quarterly market share summary will be: • Published by ELEXON on the ELEXON website within 10 business days of receiving the data (as described in 1.1) from the SVAA. • Downloadable as a csv file. Information for all Suppliers below the publication thresholds in Requirement 1.2 will be combined and published and included in the csv file as 'Other Suppliers'.[6]
1.4	The information published will be publicly available to all BSC Parties and non-BSC Parties (no data licence or fee will apply).
1.5	A disclaimer relating to the information published under this requirement will be included on the ELEXON website to protect ELEXON from any commercial liabilities that may arise from its use.

[6] Section 7 explains how P315 will be implemented if the Implementation Date falls mid way in a reporting quarter.

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Requirement 2	
Report daily P0276 data on the ELEXON Portal.	
2.1	The SVAA will produce a daily 'P0276' report which will contain the same contents as the D0276 flow, for SF, RF and DF Run Types (where DF Run data is available, RF Run data shall be replaced by DF Run data for the corresponding Settlement Date), but will not contain a recipient Supplier ID and will not be a DTC D-flow (therefore renamed as P0276).
2.2	The SVAA will publish the P0276 report on the ELEXON Portal on a daily basis from the Implementation Date going forward.
2.3	The SVAA will send the P0276 report to National Grid on a daily basis.
2.4	The SVAA will ensure that the latest two year's P0276 reports[7] should be available to BSC Parties and licensees via either or a combination of ELEXON Portal and DVD archive on request.
2.5	All BSC Parties would have the right to access this report (including historical reports of Settlement Dates after the Implementation Date, within the archive period).
2.6	Any non-BSC Party would have the right to access this report (including historical reports of Settlement Dates after the Implementation Date, within the archive period) upon agreeing the relevant data licence agreement and paying the associated fee *(see Section 5)*.

[7] The two year archiving period would only be reached two years after the Implementation Date. (I.e. a full two years' P0276 data would only be available by then)

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4 Alternative Solution

Alternative Modification Solution

The Alternative Modification solution contains three parts:

- **Publication of Supplier Market Share Summary Data** (same requirements as the Proposed Modification)

- **Publication of P0276 data**

  The Alternative Modification contains the same requirements as the Proposed Modification and, in addition, would make historical P0276 available upon implementation. This means that as well as providing new P0276 data from the Implementation Date going forward, historical P0276 data (up to two years before the Implementation Date) would also be made available on the Implementation Date.

  The same data archive approach under the Proposed Modification shall be applied except that two years archive data will be available immediately upon implementation (i.e. the latest two year's P0276 data shall be made available, via a combined approach of ELEXON Portal and DVD archive, to BSC Parties and data licensees when requested).

- **Publication of GSP Group Market Matrix Report**

  The GSP Group Market Matrix Report would contain GSP Group consumption data by PC, SSC, LLFC, Distributor and TPR. This report shall be created by summing D0082 'Supplier Purchase Matrix Report' across all Suppliers and Data Aggregators, resulting in a single consumption report per GSP Group. This report will not contain any Supplier level data or data that could be used to derive the market share of Suppliers.

  ELEXON shall publish the new GSP Group Market Matrix Report daily for all Settlement Run Types on the ELEXON Portal. This report will be available to BSC Parties and to non-BSC Parties under a licensing agreement.

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P315 Alternative Modification solution requirements

Requirement 1 (same as the proposed solution)
Publish quarterly data on Supplier volumes and MPAN counts on the ELEXON website.

Requirement 2 *(same as Proposed Modification* ***except for requirements 2.4 and 2.5****)*	
Report daily P0276 data on the ELEXON Portal.	
2.1	The SVAA will produce a daily 'P0276' report which will contain the same contents as the D0276 flow, for SF, RF and DF Run Types (where DF Run data is available, RF Run data shall be replaced by DF Run data for the corresponding Settlement Date), but will not contain a recipient Supplier ID and will not be a DTC D-flow (therefore renamed as P0276).
2.2	The SVAA will publish the P0276 report on the ELEXON Portal on a daily basis from the Implementation Date going forward.
2.3	The SVAA will send the P0276 report to National Grid on a daily basis.
2.4	Upon implementation, the SVAA will also produce historical P0276 reports dating back to two years from the Implementation Date and make these reports available to BSC Parties and licensees.
2.5	The SVAA will ensure that the two years' historical P0276 reports should be available to BSC Parties and licensees from the Implementation Date onwards[8], via either or a combination of ELEXON Portal and DVD archive on request.
2.6	All BSC Parties would have the right to access this report (including two years' historical reports within the archive period).
2.7	Any non-BSC Party would have the right to access this report (including two years' historical reports within the archive period) upon agreeing the relevant data licence agreement and paying the associated fee (*see Section 5*).

Requirement 3	
Report daily GSP Group Market Matrix Report on the ELEXON Portal.	
3.1	The SVAA will produce a daily GSP Group Market Matrix Report which will contain D0082 data aggregated for all Suppliers for all Settlement Run Types, but will not contain Supplier IDs and will not be a DTC D-flow.
3.2	The SVAA will publish the GSP Group Market Matrix Report on the ELEXON Portal on a daily basis.
3.3	The SVAA will archive all GSP Group Market Matrix Reports from the Implementation Date and going forward for a period to be determined.
3.4	All BSC Parties would have the right to access this report.
3.5	Any non-BSC Party would have the right to access this report upon agreeing the relevant data licence agreement and paying the associated fee (*see Section 3*).

[8] Unlike the Proposed Modification, the Alternative Modification will make two years' historical P0276 report dating back from the Implementation Date immediately available upon the implementation. This means that Parties and licensees can conduct their demand analyses immediately based on the historical data.

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5 Legal text

This section summarises the disclaimer and licencing provisions and the BSC changes for P315.

Legal disclaimer and P315 data licence

The legal disclaimer for the quarterly market share published on the ELEXON website and the P315 data licence for the data reported on the ELEXON Portal will be developed as part of implementation of P315, if approved.

Disclaimer (for Supplier Market Share Summary Data)

A disclaimer on the ELEXON website relating to the P315 data would limit ELEXON's liability for any commercial use of the data under Requirement 1. The disclaimer would also state that the data cannot be used or reproduced except with the prior written consent of ELEXON.

This reflects the approach in use for the BMRA data available on the BM Report website.

Data licence (for P0276 data and GSP Group Market Purchase Matrix Report)

Non-BSC Parties would only be able to access P315 data reported on the ELEXON Portal if they agree a P315 data licence and pay the applicable fee.

BSC Parties will be able to access the P315 Portal data without agreeing a data licence and without paying a fee.

- **Data licence agreement**

The P315 data licence agreement would allow non-BSC Parties to access the data while imposing limits on the use of the data and indemnifying ELEXON. The licence would reflect the approach under previous reporting Modification P114 'Entitlement of Licence Exemptible Generators (LEGs) and other Non-trading Parties to BSC Membership Without Evidence of Trading', which introduced a licence to allow non-BSC Party licensees to make use of the P114 data[9]. The P315 data licence would be separate to the P114 data licence.

- **Data licence fee**

Non-BSC Parties would have to pay a fee associated with the P315 data licence in order to access the relevant data. Though the P315 data licence and P114 data licence would be separate, a single fee would apply to both. Existing P114 data licensees who have paid the fee for P114 data would not incur an additional cost for P315 data for the relevant licensed period, but would be required to agree the P315 data licence conditions.

Upon implementation of P315 the fee to license both P114 and P315 data would be £3,000 per annum, which is the current licensing fee for P114 data only. This figure reflects the principle established under P114 which non-Parties pay a fee to access data that is equivalent to a year's BSC Party Base Monthly Charge (see BSC Annex D-3 3.1(a)), set at £250 per month.

[9] SAA-I0142, CDCA-I0422, CDCA-I0291 and CDCA-I01301, AKA 'P114 data'.

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The rationale for this licence fee is to recover development and operational costs of the Modification. The combined P114/P315 licence fee may therefore be adjusted (i.e. reduced) in future, to ensure it remains appropriate for this purpose.

Market participants' views on data licence arrangement

Amongst all the BSC Parties who responded to the consultation, none of them was against this licence arrangement. Two non-BSC Parties were supportive of the proposed licence arrangement, while one non-BSC Party disagreed because they could not see sufficient value of the data for cost of £3,000 a year.

Legal text for proposed solution

The P315 Proposed Modification solution would require changes to BSC Section V 'Reporting' to introduce reporting requirements for BSCCo and the SVAA to publish the quarterly Supplier Market Share Summary Data and P0276 files on the ELEXON website and the ELEXON Portal respectively.

A new paragraph would be introduced into Annex S-2 'Supplier Volume Allocation Rules' to define the mathematical methodology which the SVAA shall use to generate Supplier Market Share Summary Data.

BSC Section X Annex X-1 'General Glossary', Annex X-4, Annex X-5 Annex X-6 and Annex X-7 would be updated to include the newly defined terms and their descriptions.

A new Annex X-9 would be introduced to include further technical properties used in Annex X-1.

Note that any redlined changes to the relevant Code Subsidiary Documents will be provided as part of the implementation of P315 Proposed Modification, if it is approved.

The proposed redlined changes to the BSC can be found in Attachment A[10].

Legal text for alternative solution

The P315 Alternative Modification solution would require the same changes to the BSC as the Proposed Modification solution, with the addition that the requirement to report the GSP Group Market Matrix Report on the ELEXON Portal would also be introduced to Section V 'Reporting'.

The proposed redlined changes to the BSC can be found in Attachment B[10].

[10] Note that this is version 4 of draft text changes, which have been amended following the comments from consultation respondents.

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6 Impacts & Costs

Estimated central implementation costs of P315

The estimated central implementation costs for the Proposed Modification and Alternative Modification are £80k and £104k respectively.

The estimated lead time to implement the Proposed Modification and Alternative Modification are 29 weeks and 36 weeks respectively.

P315 industry costs

No costs identified for BSC Parties to implement P315. There could be costs to Parties if they decide to further analyse or process the data, but this is not a mandatory requirement of P315 implementation.

P315 impacts

Impact on BSC Parties and Party Agents	
Party/Party Agent	Impact
BSC Trading Parties	No direct impacts on BSC Parties to implement either the Proposed Modification or the Alternative Modification as there will be no system changes required. There may be impacts if BSC Parties wish to further analyse or process the data provided.

Impact on Transmission Company
There would be minimal impacts on the Transmission Company to establish a process to receive the data published under P315.

Impact on BSCCo	
Area of ELEXON	Impact
BSC Operations	Data processing would be required to derive the Supplier quarterly market share summary: • Further group Supplier IDs into Supplier Party name as necessary. • Apply the reporting thresholds as described in Section 3 and identify Suppliers whose market shares are below the thresholds and further aggregate their Supplier Consumption Reporting Group data as 'Other Suppliers'. • Obtain Supplier CVA import volumes from SAA-I0143 for the relevant reporting quarter using the R1 data. • Add CVA import volume to the Supplier Consumption Reporting Group volumes for each Supplier to derive the Supplier market share summary. BSC Operations would need to set up the website publication process.

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Impact on BSC Systems and process	
BSC System/ Process	Impact
SVAA	Under both the Proposed Modification and the Alternative Modification: • The SVAA will be required to provide the 'Supplier Quarterly Consumption Report', containing Supplier Consumption Reporting Group volumes in MWh and averaged MPAN counts for all Supplier IDs, to ELEXON. • The report should be sent to ELEXON as soon as practically possible after the relevant R1 Run has taken place. • The SVAA shall produce the relevant daily P0276 file with no recipient Supplier ID section of the file header, for SF, RF (or DF is applicable) Run Types and publish these files on the ELEXON Portal from the Implementation Date onward. • The SVAA shall send the daily unzipped P0276 file to the Transmission Company via ftp. • When the Portal storage limit is reached, the SVAA shall start quarterly data archive on DVDs, i.e. each quarterly archive shall contain the latest two years' P0276 data. Under the Alternative Modification: • In addition to the above, the SVAA will be required to produce the latest two year's P0276 data and archive this data on DVDs on the Implementation Date. (The same archive approach described in the Proposed Modification will also apply). • The SVAA shall create a new GSP Group Market Matrix Report for all Settlement Run Types that contains Suppliers aggregated D0082 data. Therefore Supplier IDs will not be shown in these files. • The SVAA will be required to publish this this new report on the ELEXON Portal.

Impact on Code	
Code Section	Impact
Section V	Changes in Section V will be required to implement this Modification. Draft legal text to deliver the Proposed Modification and Alternative Modification are included in Attachments A and B respectively.
Section S	Change in Annex S-2 will be required to implement this Modification. Draft legal text to deliver the Proposed Modification and Alternative Modification are included in Attachments A and B respectively.
Section X	Changes in Annex X-1, X-4, X5, X6, X7 and X9 will be required to implement this Modification. Draft legal text to deliver the Proposed Modification and Alternative Modification are included in Attachments A and B respectively.

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Impact on Code Subsidiary Documents	
CSD	Impact
BSCP508	Changes will be required to reflect the data publication. ELEXON will produce the redlined changes to BSCP508 as part of P315 implementation, if it is approved.

Impact on other Configurable Items	
Configurable Item	Impact
SVAA Service Description and URS	Changes will be required to reflect the changes to processes. ELEXON will produce the redlined changes to these documents as part of the P315 implementation, if it is approved.

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7 Implementation

Recommended Implementation Date

The Workgroup recommends the following Implementation Date for both P315 Proposed Modification and P315 Alternative Modification:

- 30 June 2016 if the Authority's decision is received on or before 22 October 2015; or
- 3 November 2016 if the Authority's decision is received after 22 October 2015 but on or before 25 February 2016.

Implementation Approach

For both the Proposed and Alternative Modifications, if the Implementation Date falls back to 3 November 2016, the quarterly market share summary for Q4 2016 will be pro-rated up for the whole quarter based on the data available from the Implementation Date to the end of the quarter, i.e. first publication would be mid-March 2017, reporting on the period of Q4 (October - December) 2016 based on data for 3 November 2016 - 31 December 2016.

This issue does not arise if either the Proposed or Alternative Modification is approved with an Implementation Date of 30 June 2016.

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8 Workgroup's Discussions

Summary of the previous assessments

P315 has undergone a significant amount of assessment prior to this Assessment Report, and the relevant documents can be found on the P315 page of the ELEXON website. The below section summarises the key milestones of the P315 Assessment Procedure. The detailed Workgroup's discussions during each stage of the Assessment Procedure can be found in Attachment D.

- ELEXON issued the **first Assessment Consultation** on 27 February 2015, which sought market participants' views on the Workgroup's four potential Modification solutions by different granularities of market share data, i.e. monthly, daily, HH and SSC/TPR.

  The consultation respondents expressed a number of concerns over the proposed data granularities and their consequential impacts on commercial sensitivity and competition.

  The Workgroup considered these responses and subsequently amended its potential solutions into the Proposed and Alternative Modifications. The key changes included further aggregation of data (reduced granularity), i.e. combining PC into customer types, reporting Suppliers' market shares on a GB level rather than on a GSP Group level and provide Suppliers' market share summary data on a quarterly basis (reduced frequency of publication and avoided publication of 'real time' data).

  The Workgroup believed that the amendments addressed the concerns from the respondents and therefore made a recommendation to the BSC Panel to approve the Alternative Modification.

- ELEXON presented the **Assessment Report** to the BSC Panel on 9 April 2015. The Panel noted the Workgroup had taken into account respondents' views when developing the Proposed and Alternative solutions, but believed due to the concerns raised over the initial solution designs and their consequential impacts on competition and commercial sensitivity, respondents' views should again be sought.

  The Panel therefore directed ELEXON to issue the second Assessment Consultation to seek market participants' views on the Proposed and Alternative Modifications and whether they believe their concerns were addressed by the Workgroup in the solution designs. The Panel granted a two month extension to the Assessment Procedure of P315.

- ELEXON issued the **second Assessment Consultation** on 21 April 2015, which sought market participants' views on the Workgroup's Proposed and Alternative Modifications. Six out of the 13 respondents supported the Modifications, with a number of respondents still remaining concerned about some issues previously raised.

  The Workgroup decided to make further amendments to its solutions into the revised Proposed and Alternative Modifications, with an aim to address the remaining concerns from the respondents. The Panel granted another two month extension for the Workgroup to further assess the solutions.

  The Workgroup subsequently introduced two changes to the previous solutions:

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- Data relating to Suppliers with a small market share in both domestic and non-domestic markets shall not be published individually. Instead, these Suppliers' data would be grouped together with other such Suppliers and reported as a single anonymous entity called 'Other Suppliers'. This applies to both Proposed and Alternative Modifications.
- Publish historical P0276 data upon the P315 implementation. This only applies to the Alternative Modification.

The rationales of these changes are discussed in the 'Revised Modification Solutions' section of this paper.

- ELEXON issued the **third Assessment Consultation** on 3 July 2015, seeking market participants' views on the Workgroup's revised Proposed and Alternative Modifications. A majority of the respondents (seven out of 12) supported the Modification. The full responses can be found in Attachment C.

  The Workgroup believed that the concerns from the market participants have been addressed in its revised Proposed and Alternative Modifications and provided its views to the key issues and concerns that arose during the Assessment of P315 in the 'Workgroup's overall assessment of the case for change' section of this paper.

Revised Modification Solutions

Anonymising data for Suppliers with a small market share using reporting thresholds

The Proposer and Workgroup considered the concerns of some respondents to the second Assessment Consultation that P315 would disclose commercially sensitive data. The Workgroup believed that presenting data relating to Suppliers with a small market share in an aggregated and anonymous form in the Supplier Market Share Summary Data report would further sufficiently address these concerns. The Proposer and the Workgroup believed that this would protect smaller Suppliers by not revealing their market shares to their competitors, while still improving market transparency by publishing market share data for those large Suppliers.

How do the reporting thresholds work?

In order to identify and anonymise data for small Parties, two reporting thresholds would be introduced that capture Suppliers' market shares in both domestic and non-domestic retail markets. The principle is that if a small Supplier that has low market shares in both domestic and non-domestic retail markets (therefore captured by both thresholds), its data should anonymised and further grouped in the report.

To be consistent with the approach that Ofgem currently uses to report domestic and non-domestic market shares, a Supplier's domestic market share would be represented by the number MPANs in PC1-2 and its non-domestic market share would be represented by the combined energy volume that its PC3-8 and HH customers consume over a reporting period.

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What are the appropriate reporting thresholds?

The Proposer believed that the rationale for the thresholds should be to facilitate as much transparency as possible while protecting Suppliers with a very small market share, i.e. the thresholds should be set to the minimum levels that would achieve this. The Workgroup supported this.

The Ofgem representative noted that market shares are most often reported to show the degree of competitive pressure that Suppliers are likely to exert on their rivals. In this sense, Ofgem suggested that the transparency benefits associated with publishing individual market shares for very small Suppliers could be reduced and should be considered very carefully against the commercial sensitivity issues they may raise.

The Workgroup considered an analysis, based on Quarter 4 2014 data, on the number of Suppliers that would be anonymised under four threshold levels. The analysis[11] can be found on the P315 page of ELEXON website. The summary of findings is shown in the below table.

Threshold scenarios

% of market share	Domestic MPAN threshold	Non-domestic volume threshold	Number of Supplier anonymised	Anonymised Volume (GWh)	Anonymised MPAN count	Anonymised % of Volume	Anonymised % of MPAN
0.18%	50,000	100GWh	24/49	696	201454	1.22%	0.73%
0.25%	69,000	142GWh	25/49	807	201876	1.42%	0.73%
0.5%	138,000	284GWh	29/49	1162	540865	2.04%	1.95%
1%	277,000	569GWh	34/49	2330	979215	4.09%	3.54%

The Ofgem representative noted that Ofgem has recently announced a review of the information it collects and publishes, which will include, among others, seeking representations from interested parties around frequency and level of aggregation of market shares to be published. In its annual report to the European Commission, Ofgem currently publishes individual market shares for the largest six Suppliers and present in aggregate form the market shares for the remaining Suppliers (the individual market share reporting requirement for this report is based on a 5% threshold level).

The Workgroup noted a 1% reporting threshold is currently used in Cornwall Energy's industry market share reports. Following the discussions an attendee noted a voluntary 'opt in' approach for Suppliers is the case with current market share reports provided by third parties, and that this could be considered along with a threshold.

The Proposer believed that setting a high threshold would not provide sufficient transparency and would make it more difficult for new market entrants to understand the market. For instance, the analysis indicates that thresholds equating to 1% market share would result in 34 of the 49 Suppliers being anonymised, leaving only 15 being reported upon.

[11] We obtained quarterly aggregated PC3-8 and SVA HH energy volumes (for non-domestic measurement) and averaged PC1-2 MPAN number (for domestic measurement) for each Supplier. The MWh volume and MPAN number thresholds were derived from a certain percentage of the total market share in both markets across all Suppliers. See Attachment D for details.

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A Workgroup member echoed this view and said that ideally full transparency should be provided in order to understand the growth of Suppliers. An attendee questioned the value of reporting data for small Parties as he believed that reporting the market share of smaller Parties provides no benefit to those Parties or new entrants because the market is dominated by larger players.

Whilst the Proposer was not opposed to a threshold equating roughly to 1% of market share, he was of the view that it could be lower; one of the purposes of this Modification is to allow potential new entrants to see how fast the type of companies they aspire to be can grow. This would not be achieved if only data relating to the Big Six were available. In the Proposer's view, the issue was not one of choosing a threshold to separate out large Suppliers from smaller Suppliers, but to choose a threshold below which a small Supplier could reasonably argue that their ability to grow could be inhibited by being perceived as too small. In the Proposer's view, this threshold would be 10,000 customers in the domestic market and 100GWh over a quarter in the non-domestic market. These thresholds do not equate to the same market share; 100GWh is approximately a 0.18% market share and 10,000 customers equates to a significantly lower market share.

Respondents' views on the reporting thresholds

The majority of respondents (six) supported the use of reporting thresholds. Four respondents disagreed, and one of them believed that the report should be fully transparent (i.e. without thresholds). The other respondents who disagreed with the reporting thresholds believed that the thresholds would introduce a non-level playing field for those medium size Suppliers exceeding the threshold and they will be disproportionally more vulnerable to competitive responses from the large competitors

Five of those who supported the use of thresholds believed that 1% equivalent thresholds were acceptable, with the other respondent in support of thresholds believing it 1% to be too high given that it still covers up two thirds of the market but noting that the thresholds could be set to 1% and reduced in future. However, the respondents had diverse views on the preferred threshold parameters, ranging from 0% (no thresholds) up to the proposed 1% (see responses to Question 10 in the Assessment Consultation v3.0).

Workgroup's final views on thresholds

The Proposer preferred lower reporting thresholds. However, on balance and taking into account the views of industry participants, Ofgem's input, and existing industry reporting, he decided that, for the Proposed Modification, the reporting thresholds should be 250,000 MPANs for the domestic market and 500GWh volume for the non-domestic market. These are approximately equivalent to 1% market share in both markets (NB under the analysis these figures would result in 34 of the 49 Suppliers being anonymised, the same as the more precise figures equivalent to 1% market share presented in the summary table).

The Workgroup agreed with this view and, by majority (one member preferred 0.25%), decided that the reporting thresholds should be the same for the Alternative Modification, i.e. 250,000 MPANs for the domestic market and 500GWh volume for the non-domestic market.

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Publication of historical P0276 data (only applies to the Alternative Modification)

Rationale for publishing historical data

The Workgroup believed that, for the Alternative Modification, historical P0276 data as well as the new daily P0276 data should be published, or otherwise made available, to BSC Parties and data licensees. The Workgroup believed that having access to historical P0276 data would help parties to develop a better understanding of GSP Group demand and the development of embedded generation over time and subsequently improve forecasting in the future. Data from the Implementation Date onward would also be archived and made available to Parties and licensees that wish to begin to use the P315 arrangements after the Implementation Date (this aspect is the same as under the Proposed Modification).

Respondents' views on historical P0276 data

Six out of the 12 respondents supported the publication of historical P0276 data, with two respondents being neutral.

Those respondents who were in favour believed that historical P0276 data would help improve demand forecasting if trends can be better identified from historical data. One respondent commented that the publication of historical data for P0276 allows the benefits of trend analysis to be realised as soon as P315 is implemented rather than having to wait for two years after P315 implementation. The Transmission Company believed that their demand forecasting activity would benefit more from having access to historical P0276 data.

Four respondents disagreed with the publication of historical P0276 data. One of them commented that the additional cost to publish historical data has not been justified for any commensurate benefits. Another respondent believed that nobody would need the historical data as BSC Parties already have access to it and that more granular data can be obtained from DECC. However the Workgroup did not agree with view, because the historical P0276 data that P315 would make available would be at a more useful level than the DECC data.

Delivery of P0276 data

The BSC Central Systems only archive and hold P0276 data going back 24 months. The Workgroup believed that all of this 24 months' data should be made available as archived P0276 data upon implementation.

It is estimated that quarterly P0276 data, for all Run Types, would be around 10GB, which creates problems for data storage. Reducing the number of Run Types reported and archived would significantly reduce the amount of data. The Workgroup decided that it would be most useful to market participants to receive SF, RF and DF P0276 data for demand forecasting and validation purposes. Whenever DF data is available, it would replace RF data for the corresponding Settlement Dates. This approach would result in much less data storage space being required to deliver the solution.

<u>Delivery approach under the Proposed Modification</u>

Upon implementation, ELEXON's service provider would provide newly generated daily P0276 data on the ELEXON Portal.

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As time passes, the data would fill up the allocated Portal storage. Once the Portal storage limitation is reached, the historical P0276 data on the Portal would be archived on DVDs on a quarterly rolling basis. The combined approach of ELEXON and DVD archive ensures that BSC Parties and licensee have access to the latest two years' P0276[12] via ELEXON Portal and/or DVDs.

Delivery approach under the Alternative Modification

Upon implementation, ELEXON's service provider would provide newly generated daily P0276 data on the ELEXON Portal and make two years historical P0276 data available to BSC Parties and licensees via either or a combination of ELEXON Portal or/and DVDs. Once the Portal storage limitation is reached, the historical P0276 data on the Portal would be archived on DVDs on a quarterly rolling basis.

The combined approach of ELEXON and DVD archive ensures that BSC Parties and licensee have access to the latest two years' P0276 via ELEXON Portal and/or DVDs.

Workgroup's overall assessment of the case for change

This section summarises the Workgroup's assessment of whether there is a case for change in relation P315, key issues raised by market participants throughout the Assessment Procedure of P315 and the Workgroup's consideration of the issues raised.

Is there a case for change?

Views that there is a case for change:

- The SVA arrangements encourage participants to combine their demand and embedded generation into one entity (i.e. within a Supplier BM Unit) to realise embedded benefits. The Workgroup considered that this masks the true customer demand and believed that this lack of transparency in SVA embedded generation could result in inefficient pricing in forward markets. A Workgroup member believed that the current wholesale price is overstated due to this pricing inefficiency.
- The System Operator has low visibility of demand and generation behaviours within distribution networks meaning that they will find it difficult to forecast demand and dispatch generation efficiently.
- The Workgroup believed that BSC Parties and the System Operator could take advantage of the Supplier market share data to improve their demand forecasting. Currently participants in the SVA arrangements can access the D0276 data flow but non-physical traders or participants with a wholly CVA business cannot. Therefore they are disadvantaged in that they could not see the GSP Group level total embedded generation and demand volumes.

  A respondent's view: they have not seen actual evidence to date of the proposition that current SVA arrangements are actually creating an overstated wholesale market price due to reporting combined demand and embedded generation. Neither is there any evidence that this modification would directly benefit consumers.

[12] Under the Proposed Modification, P0275 data will only be produced from the Implementation Date onwards. Therefore the two year archiving period would only be reached two years after the Implementation Date. (I.e. a full two years' P0276 data would only be available by then).

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Views that there is no case for change:

- Three respondents stated in their consultation responses that they did not agree with the Proposer's rationale to raise the change as there is no clear defect in the current arrangements. They did not believe that the benefits and the justification that have been put forward to date to justify the change.

- One respondent commented that P315 solution confuses two separate issues – disclosure of Suppliers' market share information and help the Transmission Company to balance the system. The respondent did not support the former and, though it supported the latter objective, believed that a separate Modification should be raised to address it.

  The Workgroup's view: P315 aims to improve transparency in the retail electricity market by making basic market share information publicly available. By doing so, the Transmission Company would benefit from receiving this data, which it currently does not have access to, and use it to improve its demand forecasting. Therefore the Modification aims to improve transparency, which would lead to a number of benefits including helping the Transmission Company to balance the system.

Impact on competition

P315 promotes competition:

- The Workgroup noted that currently some Suppliers voluntarily provide data to third parties to report on market shares, which is then shared within that community of Suppliers. Suppliers (and other BSC Parties) and prospective new market entrants outside this community do not have access to this information and are therefore at a disadvantage. The Workgroup considered that lack of transparency of market share data and the asymmetry of access to it create barriers to entry for new and prospective market entrants and makes it necessary to spend money to conduct market research.

- The Workgroup and a number of respondents believed that publishing P315 data would help the existing market participants and potential new entrants to understand market shares by different customer types in the retail market and allow them to better identify opportunities and react to competition.

- The Workgroup felt P315 would promote competition and encourage new entrants to the electricity retail market due to better visibility (see page 30 for further details around new entrants). Furthermore, increased competition would encourage efficient pricing in both wholesale and retail markets, which would be beneficial for customers.

- The Workgroup believes that making basic market share information centrally available would increase choice, as Suppliers are currently limited to one provider of such data, and make the data more available to Suppliers, new entrants and prospective entrants, which would better facilitate competition.

P315 hinders competition:

- Some respondents had concerns that publishing excessive Supplier market share data would reveal commercially sensitive information and enable anti-competitive

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behaviours, i.e. larger Suppliers could identify the customer base for smaller Suppliers and take actions to 'squeeze them out of the market'.

One respondent argued that P315 would be most damaging to those independent Suppliers that have been most successful in establishing themselves in the market. This is because as the publication of market shares would force the disclosure of the most new information on them. Their successes would be visible to all market participants and therefore much more likely to draw a response from threatened large competitors.

- Four respondents commented that large Suppliers will disproportionally benefit from the publication of market share data compared with their smaller competitors, due to having access to more resources to analyse and make use of the data. One respondent felt that large Suppliers with more resources can obtain a more granular view of market shares by combining P315 data together with other data already available to the market and reveal their competitors' commercial activities.

  A Workgroup member's view: smaller Suppliers have an inherent advantage of being flexible and being able to react to changes much quicker compared to larger Suppliers, for instance it would usually take large Suppliers a long time to update their systems to respond to changes and make use of the data.

- A respondent believed that P315 could send distorted view of consumer engagement by making the market looks less competitive than it is because it would not differentiate between long term market share and consumers won through competition and would not take into account consumers that switch tariffs with the same Supplier. The respondent contended that this could be disadvantageous to new entrants by encouraging them to join a market that appears different to how it actually operates.

  Workgroup's view: the Workgroup did not agree with this argument because it did not believe that increased transparency of information would distort the view of the market. Though there are limits to the P315 data it would provide Parties and licenced non-Parties with basic market share information not readily available to them at present.

Commercial confidentiality

P315 data is not commercially sensitive:

- The Workgroup noted that, throughout the progression of P315, no information has been provided by any respondents to substantiate the concern of combining P315 data together with other data already available to the market to reveal competitors' commercial activities or demonstrate how such analysis might be achieved.

  The Workgroup did note that a respondent to the second Assessment Consultation provided a view that D0082 information could be used to reveal specific sites and their corresponding Suppliers, but that this respondent had not raised the same concern in the third consultation which the Workgroup believed was because P315 no longer involves the publication of the D0082 information in the same form. The Workgroup was confident that the design of the GSP Group Market Matrix Report

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(aggregated D0082 data for all Suppliers within each GSP Group) has eliminated any such potential risks.

- The Workgroup believed that it had considered the concerns raised from the previous consultations (which specifically asked market participants the level of data they consider as commercially sensitive) and significantly refined the P315 solutions to address the concerns and mitigate any potential risks of exposing commercially sensitive information. Despite this the same issues were raised and the Workgroup considered that given the work that has been done to mitigate possible risks the concerns are unsubstantiated.
- A respondent commented that it is very unlikely that the kind of aggregate reporting being considered would reveal information about the demand variation of individual domestic or micro-business customers, of whom a Supplier must have many to support a viable supply business.
- The Workgroup believed that the reporting thresholds would protect smaller Suppliers by not exposing their market shares to their competitors, while still improving market transparency by publishing market share data for those large Suppliers.

P315 data is commercially sensitive:

- Two respondents believed that the data to be published under P315 is commercially sensitive and they felt that large Suppliers with more resources can obtain a more granular view of market shares by combining P315 data together with other data already available to the market and reveal their competitors' commercial activities. Currently some Suppliers provide their data to consultants for them to pull together reports on market shares under certain agreements, but it doesn't mean that this data should be published.
- Two respondents (Cornwall Energy and Spark Energy) cited the Competition and Markets Authority (CMA)'s 'Transparency and disclosure: Statement of the CMA's policy and approach', stating its policy and approach in the first P315 Assessment Procedure (issued February 2015). They believed that the data to be published under P315 would be seen as confidential information under this guidance.

  The respondents suggested that in considering the principles around P315 it might be helpful to consider the CMA's approach, and referred specifically to paragraph 4.16 (from 'Identifying confidential information') and noted that the following types of information are included in that which will normally be considered confidential for the CMA's purposes:

  - financial information or other data (which could include, for example, parties' turnover sales, market share data etc) relating to a business which is less than two years old; and
  - information which, if disclosed, may adversely affect the competitive process in the market.

  The respondents did not believe that P315 had been considered against these parameters, nor how information provision under the current baseline is inconsistent with these.

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ELEXON's legal advice was that the cited CMA guidance was not relevant to the publication of information under P315. This is because the guidance covers the publication of information which may be been obtained under the CMA's investigatory powers rather than provided under a party's consent. P315 on the other hand would publish information with BSC Parties' prior knowledge and consent (as a result of their being party to the BSC). The CMA guidance is not binding on P315 and, because the CMA's activities were different to the requirements under P315, it would not be good practice to apply the specific principles of the guidance to P315.

The Workgroup noted this and agreed the CMA guidance was not relevant to P315. Though the Workgroup did not therefore consider the CMA's principles as set out in the guidance it considered as part of its assessment of P315 the issues of commercial sensitivity and impact on competition of publishing information.

The respondents reiterated the concern in the second consultation (April 2015), stating that P315 contravened the principles and this had not been justified. The Workgroup was satisfied that it had considered the concerns and that the CMA guidance was not applicable to P315 as the guidance concerned investigations into market misconduct. The Workgroup was open to any explanation from participants to justify the relevance of the CMA guidance to P315.

In response to the third and final P315 Assessment Procedure consultation (July 2015) Spark Energy provided a confidential response (though the public element confirmed it remained unsupportive of P315) and Cornwall Energy remained unsupportive of P315 but did not raise the CMA guidance again.

- One respondent (British Gas) to the first P315 Assessment Procedure consultation (February 2015) cited material on competition in the European Commission journal. They were concerned that the data to be published could be considered confidential information and put P315 in breach of European competition principles.

  ELEXON's legal advice was that the cited European Commission journal was not relevant to P315. This European Commission material concerns 'horizontal' agreements between market participants and its principles govern whether those agreements should be considered anti-competitive or not. The journal does not address the issue of publication of information, and P315 does not concern horizontal agreements between parties to the detriment of other parties in the market (P315 involves the whole market), so the principles in the journal are not relevant to P315.

  The Workgroup noted this and agreed the document is not relevant to P315. The Workgroup noted that any abuse of market information or misconduct is covered by competition rules.

  The respondent did not raise the concern again in their response to the second consultation (April 2015), and had changed their view and supported P315. The respondent believed that the concerns raised around the possible commercial sensitivity of data were addressed by the development of the solutions (two month publication delay and national view of market share data) and were satisfied that data flows do not concern individual supplier market shares.

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British Gas did not respond to the third consultation (July 2015). No other respondents raised a concern around, or referenced, the European Commission principles in any consultation.

- Two respondents suggested that an "opt in and opt out" approach to publishing Suppliers' market share data under P315 should be adopted, i.e. data relating to a Supplier would not be published in an individual and identifiable form unless the Supplier had 'opted in' to the arrangements (and Suppliers would be able to opt out of publication in the future if they wished).

  The Workgroup noted that if P315 was approved it would mean that Ofgem had decided that the information concerned was appropriate for regular publication, and this publication being required under the Code would mean that anyone that chooses to be a party to the BSC would have effectively agreed to its publication.

  The Workgroup's view: the "opt in and opt out" approach would not better facilitate competition as it would not result in the transparency of market data that P315 is aiming to deliver. The Workgroup considered that lack of transparency of market share data creates a barrier to entry for new and prospective market entrants and makes it necessary to spend money to conduct market research.

Industry demand for P315 data

Summary of consultation responses that favoured publication of P315 data

- A respondent was disappointed that full free access to all reports has been removed from the previous P315 solutions. The respondent believed that in order to have a significant effect for demand forecasting and seeing the evolution, the publication of historical data for P0276 would allow the benefits of trend analysis to be realised as soon as P315 is implemented rather than having to wait for two years after P315 implementation.

- A respondent believed that the information would allow them to monitor and react to competitors' changes in the marketplace. The respondent agreed that having access to historical P0276 data would assist Parties in developing a better understanding of GSP Group demand and the development of embedded generation over time and believed such data will give a sound base to assist in forecasting going forward.

- In relation to the market share summary report, a respondent believed that increased visibility of the numbers of customers/meters by broad type and their contribution to individual Supplier electricity volumes should promote competition by allowing existing and prospective Suppliers and other market participants to better understand market opportunities and trends in the markets for electricity supply and licence exempt generation.

  In relation to the P0276 data and the GSP Group Market Matrix Report, the respondent believed that increased visibility and prompt reporting of the numbers of customers/meters by broad type and their contribution to GSP Group consumption should promote competition and efficient system operation by allowing market participants to better understand and forecast underlying levels of electricity demand and licence exempt generation within GSP Groups.

- The Transmission Company believed that the additional information available will be beneficial to the Transmission Company both in relation to their demand

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forecasting and charge-setting activities. This is because it will allow better visibility of embedded generation impacts which are becoming increasingly relevant from a system operator perspective.

How could the P315 data help new entrants?

- New entrants (and prospective new entrants that access the data under licence) would be able to better understand the market share within each segment of the electricity retail market. This would allow them to better understand competition and identify opportunities.
- Currently market share reporting is provided by third party consultants. The report is only available to those parties who subscribe and are part of the community that provide information. The Workgroup believed that this creates barriers and extra costs for new entrants who wish to receive market share information. P315 would make market share information centrally available to all parties.
- If historical P0276 data is made available under the Alternative Modification, new entrants will be able to access historical GSP Group demand information, which can be used for demand forecasting and trending analyses.

Other benefits

- The Workgroup believed that the limitations in SVA data as described above means that there is an asymmetry of data transparency between the generation and supply markets. The Applicable BSC Objectives apply to both generation and supply, and while the HH data in the CVA market is transparent to all market participants the Workgroup believed that SVA data is far less transparent when compared to CVA data.
- One of the Consumption Report Group that would be introduced under P315 comprises PCs 5 to 8 Metering Systems, which are currently required to migrate to HH Settlement by 1 April 2017. The Workgroup believed that P315 would therefore help Suppliers to monitor the transition from NHH to HH for these MPANs following the P272, P300 and P322 implementations.
- The Workgroup acknowledged that the benefits that it believes P315 would deliver are difficult to quantify, but believed that these benefits would outweigh the impacts and costs of P315 implementation. The Workgroup considers that the implementation costs are not excessive compared with the potential benefits.

  There will be no direct costs or mandatory system changes required for participants to implement either the Proposed Modification solution or the Alternative Modification solution. Participants may incur additional costs if they choose to make use of the data made available by P315, but this is not a mandatory cost associated with implementation.
- The Workgroup believed that the market share report provided by third parties would be based on inference from a proportion of Settlement data and would not be accurate. P315 would provide a Settlement solution to calculate Suppliers' market share by utilising Settlement data, with improved accuracy.

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The Transmission Company's view

The Transmission Company believed that both Proposed and Alternative Modifications would be better than the current baseline. In particular it confirmed the Workgroup's view that the publication of P0276 data would help the Transmission Company to improve its current understanding of embedded generation within distribution networks, which would be beneficial for its demand forecasting and charge setting activities.

Existing report or data resources for market share analysis

Any BSC Party (or P114 licensee) can see the net position in SVA of any Supplier by GSP Group using the existing SAA-I0142 flow. The volumes in the flow are adjusted distribution losses and GSP Group Correction and involve netting of demand from embedded generation. This data has been available to BSC Parties from 27 March 2001 and to licensed third parties since 24 February 2004.

Suppliers already have access to the D0276 flow and can process it. This shows aggregate data totalled by CCC ID summed across for all Suppliers. Using this data, any Supplier can get a view on the total demand in each GSP Group.

It would be difficult to combine SAA-I0142 data and D0276 data together to extract information on the position by PC of a Supplier in a GSP Group as the netting of generation and demand in the SAA-I0142 flow masks information and different Suppliers have different positions in segments (e.g. domestic or industrial & commercial Suppliers).

Currently all Suppliers have access to D0276 data but generators and non-physical traders do not. This means they have an information disadvantage. Also the Transmission Company does not see this data.

Market participants also have access to Electricity Central Online Enquiry Service (ECOES) data, which displays the following information:

- MPAN Core
- GSP Group ID
- Supplier Id
- Metering Point Address
- Metering Point Postcode
- Meter Id Serial Number
- Meter Type
- Profile Class
- Meter Timeswitch Code
- Line Loss Class ID
- Standard Settlement Configuration
- Energisation Status
- Energisation Status Effective From Date

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The Workgroup believed that the ECOES data contains more granular details than the Supplier Market Share Summary proposed under P315 are already visible to all market participants. If it was possible for large Suppliers to analyse this data for predatory pricing they could already do it. The 1% reporting threshold means that smaller participants and new entrants are protected under the Supplier Market Share Summary Data.

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9 Workgroup's Conclusions

Workgroup's recommendation to the Panel

The Workgroup has unanimously concluded that:

- the Proposed Modification does **better** facilitate the Applicable BSC Objectives when compared to current Baseline; and
- the Alternative Modification does **better** facilitate the Applicable BSC Objectives when compared to current Baseline.

The Workgroup, except for the Proposer, concluded that:

- the Alternative Modification does **better** facilitate the Applicable BSC Objectives when compared to the Proposed Modification.

Therefore, the Workgroup recommends to the Panel that the **P315 Alternative Modification should be approved and the P315 Proposed Modification should be rejected**.

Workgroup's views against the Applicable BSC Objectives

The Workgroup unanimously agreed that P315 would be neutral to Applicable BSC Objectives (a), (d), (e) and (f) and would be beneficial to Applicable BSC Objectives (b) and (c).

The Transmission Company confirmed that they would benefit from the publication of P0276 data and the GSP Group Market Matrix Report for their demand forecasting and charge setting activities.

Two Workgroup members previously believed, at the time that the first Assessment Report was produced, that P315 Proposed and Alternative Modifications would be marginally detrimental to the Applicable BSC Objective (d) due to the implementation costs. They subsequently agreed that the benefits of reporting Modifications are difficult to quantify, but overall they believed that the benefits of both P315 Proposed and Alternative Modifications would offset their implementation costs and therefore both Modifications are neutral against the Applicable BSC Objective (d).

The following table contains the Workgroup's views against each of the Applicable BSC Objectives for both the Proposed Modification and Alternative Modification:

Does P315 better facilitate the Applicable BSC Objectives?		
Obj	Proposed Solution	Alternative Solution
(a)	• **Neutral** (unanimous)	• **Neutral** (unanimous)
(b)	• **Yes** (unanimous) The Transmission Company would benefit from having greater visibility of SVA embedded generations and therefore improve their demand forecast and charging activities. If BSC Parties can take advantage of the P315 data to improve their	• **Yes** (unanimous) The benefits identified for the Proposed Modification would be greater if more market data is released, as under the Alternative Modification.

What are the Applicable BSC Objectives?

(a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence

(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System

(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

(d) Promoting efficiency in the implementation of the balancing and settlement arrangements

(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]

(f) Implementing and administrating the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation

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Does P315 better facilitate the Applicable BSC Objectives?		
Obj	Proposed Solution	Alternative Solution
	forecasting, there would be less imbalance volume for the Transmission Company to manage.	
(c)	• **Yes** (unanimous) It would help the existing BSC Parties and new entrants to better understand Supplier market shares and would promote competition.	• **Yes** (unanimous) The benefits identified for the Proposed Modification would be greater if more market data is released, as under the Alternative Modification.
(d)	• **Neutral** (unanimous)	• **Neutral** (unanimous)
(e)	• **Neutral** (unanimous)	• **Neutral** (unanimous)
(f)	• **Neutral** (unanimous)	• **Neutral** (unanimous)

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Panel's discussions

Reporting threshold

One Panel Member noted that, from ELEXON's analysis, a 1% threshold would only report 15 Suppliers in the market (out of 49) and was unsure whether this threshold is set too high. The Panel noted that the Proposer and Workgroup had considered the 1% threshold to be in line with other existing market share reports currently available. P315 did not originally include a threshold, but the threshold approach was introduced to address industry concerns around the impact on small Suppliers, particularly new entrants; while some Workgroup members would have favoured a lower threshold, 1% was viewed as consistent with other reporting and a value that may be acceptable to Ofgem..

Another Member noted that Ofgem is currently reviewing the appropriate threshold for similar market reporting and that the proposed 1% may therefore need to be changed in the future to be consistent with Ofgem's reporting threshold. The Member also reflected that if the 1% value is inconsistent with the threshold considered optimal by Ofgem, approval of P315 could be rejected due to this single aspect (i.e. if Ofgem otherwise felt the Modification should be approved), which would be unfortunate and inefficient. The Member noted that there may have been benefit in leaving the thresholds in the P315 solution to the discretion of the Authority, but the Panel noted that under the P315 solutions the Proposer and Workgroup decided that the thresholds would be defined in the Code, and therefore any future changes to the thresholds would require a Modification.

Embedded generation transparency

One Panel Member expressed a view that the Transmission Company would require transparency in the embedded generation market. Although P315 would deliver some benefits in this area, a more effective approach could be for Ofgem to require Distribution Network Operators (DNOs) to provide the necessary information to the Transmission Company directly.

The Transmission Company representative commented that P315 was initially raised with the primary aim of promoting competition (BSC Objective (c)) but that it was also useful for the Transmission Company for system operation (BSC Objective (b)). The Transmission Company had confirmed P315 would be useful to it, and the representative acknowledged that while it would welcome the new source of data there could be more effective means of delivering embedded generation transparency.

The Panel considered that P315 does have a benefit against Objective (b), but that Ofgem might be able to deliver a more effective method to ensure the Transmission Company receives the required embedded generation information.

CMA and European Commission guidance cited by industry respondents

In response to the first P315 Assessment Procedure consultation two respondents had cited a CMA document in support of their concerns around the information that would be published under P315, and another respondent was concerned that the P315 information would be inconsistent with the guidance of a European Commission document. The Workgroup considered the references provided and legal advice from ELEXON and agreed that the cited material was not directly relevant to P315.

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One Panel Member believed that greater explanation was required of the legal advice and the Workgroup decision that the specified CMA and European Commission documents were not relevant to P315. The Member further felt that even if the documents were not directly relevant the principles underlying the guidance were relevant and to P315, for example the following sentence from the CMA guidance, paragraph 4.14:

> *"Information may be viewed as 'confidential information' if it is commercial information whose disclosure the CMA thinks might significantly harm the legitimate business interests of the undertaking to which it relates"*

The Panel noted that consideration of the underlying principles was implicit in the Workgroup's consideration of the commercial sensitivity of the P315 information and the impact of P315 on competition, but requested that the Report Phase documentation include further explanation and clarification of the Workgroup's consideration of the documents cited by industry respondents. Further explanation and clarification has been provided in Section 8 (page 26 to page 28) of this document in response to this request.

Industry demand for P315 data and new entrant benefits

One Panel Member commented that, although outside the scope of P315, the market share report would be helpful for Ofgem to understand future market share changes for 'Secure and Promote' policy.

One Panel Member sought clarification on the demand for the P315 market share data across the industry and believed that this information is not clearly captured in the report.

The Ofgem representative requested that the benefits of P315 for new market entrants be clarified.

Further clarification around the demand for P315 data and the benefits relating to new entrants has been included in Section 8 (page 28 to page 29) of the document.

Panel's initial views

One Panel Member declared an interest in P315; having done so, the Member participated in the Panel discussions (as documented above) but abstained from giving a view with respect to the Applicable BSC Objectives or the P315 recommendations.

The six Panel Members that gave views unanimously believed that P315 was neutral with respect to Objectives (a), (d), (e) and (f).

Does P315 better facilitate the Applicable BSC Objectives compared to the baseline?		
Obj	Proposed Solution	Alternative Solution
(b)	• **Yes** (5 Members) The Transmission Company would benefit from having greater visibility of SVA embedded generation and therefore improve their demand forecast and charging activities. If BSC Parties can take advantage of the P315 data to improve their	• **Yes** (5 Members) The benefits identified for the Proposed Modification apply, but would be greater due to more market data being released under the Alternative Modification. • **Neutral** (1 Member) Not convinced that this is the best way to address National Grid forecasting

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Does P315 better facilitate the Applicable BSC Objectives compared to the baseline?		
Obj	Proposed Solution	Alternative Solution
	forecasting, there would be less imbalance volume for the Transmission Company to manage. • **Neutral** (1 Member) Not convinced that this is the best way to address National Grid forecasting requirements.	requirements.
(c)	• **Yes** (5 Members) Though the benefit is marginal, competition would be facilitated by existing BSC Parties and new entrants being better able to understand Supplier market shares which would: • provide all parties, including new entrants, with equal access to basic market share information; and • encourage new entrants due to better visibility of the market. • **Detrimental** (1 Member) The market is already transparent compared with other industries; increased transparency of the kind proposed by P315 is not necessary and could be detrimental. The P315 information appears more useful to incumbents, so could have a negative impact on competition.	• **Yes** (5 Members) Though still marginal, the benefits identified for the Proposed Modification apply, but would be greater due to more market data being released under the Alternative Modification. • **Detrimental** (1 Member) The market is already transparent compared with other industries; increased transparency of the kind proposed by P315 is not necessary and could be detrimental. The P315 information appears more useful to incumbents, so could have a negative impact on competition.

The Panel, by majority (five out of the six voting Members), agreed that:

- Both P315 Proposed and Alternative Modifications do better facilitate Applicable BSC Objective (b) when compared to the baseline;
- Both P315 Proposed and Alternative Modifications do marginally better facilitate Applicable BSC Objective (c) when compared to the baseline; and
- The Alternative Modification is better than the Proposed Modification with respect to both Objective (b) and Objective (c).

The Panel, by majority, initially recommended that the P315 Alternative Modification should be approved.

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11 Report Phase Consultation Responses

This section summarises the responses to the Panel's Report Phase Consultation on its initial recommendations. The full responses can be found in Attachment D.

Summary of P315 Report Phase Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the Panel's initial recommendation that the P315 Proposed Modification should be rejected?	4	1	2	-
Do you agree with the Panel's initial recommendation that the P315 Alternative Modification should be approved?	3	4	-	-
Do you agree with the Panel's initial recommendation that the P315 Alternative Modification is better than P315 Proposed Modification?	4	3	-	-
Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P315?	1	2	3	1
Do you agree with the Panel's recommended Implementation Date?	5	2	-	-
Do you have any further comments?	4	3	-	-

Summary of responses

Should the Proposed Modification be rejected?

Four of the seven respondents to the Report Phase Consultation agreed with the Panel's initial recommendation that the P315 Proposed Modification should be rejected. Of these, one (National Grid) believed it to be better than the baseline, while three did not support P315 at all. The respondent that disagreed with the Panel's recommendation was effectively neutral on this matter; they neither strongly support nor object but are not convinced it would be an improvement. Two respondents were neutral; one of these believed that on balance there was a good chance that the Proposed Modification would better facilitate the Applicable BSC Objectives overall, but their subsequent responses show they agree with the Panel's view that the Alternative Modification is better.

Should the Alternative Modification be approved?

Three respondents agreed with the Panel's initial recommendation that the P315 Alternative Modification should be approved. One of the four respondents that did not agree was in effect neutral, matching their stance in relation to the first question concerning the P315 Proposed Modification.

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Proposed compared with Alternative

Four respondents agreed that the Alternative Modification is better than the Proposed Modification. Of these, one did not provide a rationale, one agreed with the Panel's reasoning and one noted that the additional benefits over the Proposed Modification are uncertain but the increased cost compared with the Proposed Modification is small. The other respondent that agreed made it clear that while it considered the P315 Alternative better it believed that neither Proposed nor Alternative are better than the baseline.

Legal Text

One respondent agreed that the redlined changes delivered the intention of P315 while three did not comment on this matter. Two respondents did not agree; one did not provide any explanation and the other clarified that it was not commenting on the legal text in line with its neutral stance toward P315.

One respondent was unsure whether the legal text would deliver P315 and provided substantial comments, building on previous comments supplied during the Assessment procedure; we have considered these comments and suggest some changes should be made to the legal text, as set out below.

Implementation Date

Five respondents agreed with the recommended Implementation Date for P315; one noted it is the earliest BSC System Release in which the changes can be made and the other supplied a confidential rationale. The two respondents that did not agree did so because they did not support P315, though one did note that it should be feasible to implement P315 by the dates stated.

Views against P315

The three respondents that did not support P315 provided their rationale in response to various questions and as further comments, largely reiterating points made previously. In summary, these respondents:

- Believed that the benefits against Objective (b) were overstated, and outweighed by the cost of providing a market wide report, and that P315 is not the best way to address the System Operator's lack of visibility.
- Supported the minority Panel view that further market transparency would not be beneficial and reiterated concerns that the release of data under P315 could be misleading and would favour larger incumbents.
- Contended that the market already effectively provides much of the P315 information, and that the P315 licence fee would constitute a barrier to entry similar to that which it has been argued exists at present.
- Reiterated the belief that the information that would be published should be considered commercially sensitive and that its publication would be most beneficial to larger Suppliers and, due to the use of thresholds, would be most damaging to independent Suppliers that have been most successful in establishing themselves.

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Other comments

A respondent that believed P315 would be better than the existing baseline felt that no evidence had been provided to support concerns about the impact of reporting on smaller Suppliers and therefore concluded these concerns to be exaggerated. They also believed the concerns that large Suppliers could somehow use the data to the detriment of small suppliers, or that revealing a segmental breakdown of a small suppliers portfolio would harm it, were unsubstantiated.

However, the respondent did believe that the proposed reporting would be discriminatory due to anonymising of Suppliers below defined thresholds, which they did not believe to be necessary or useful. They believed that thresholds, if used, should be lower so that data for more Suppliers is reported. They noted that physical short-term forecast data for individual BM Units with capacity above a threshold defined in the Grid Code (50/30/10 MW dependent on location) must be provided to NGET (and is published on BMRS) and seasonal forecasts of BM Unit maximum import and export must be provided under the BSC with thresholds for notifying change at 2 MW for small BM Units. The respondent considered that there was no obvious reason why domestic/non-domestic thresholds for reporting individual supplier market segment quarterly shares should be higher than these levels, indicating the thresholds should be less than half the values proposed under P315.

The respondent noted that new entrants are likely to compete with small participants, at least initially, and lack of information on the existing market segment make-up could act against new entry competition. Small suppliers are likely to be more "agile" than large suppliers, and more able to quickly take advantage of potential opportunities highlighted by more transparency. There is therefore a risk to existing small participants that information could be used by agile new entrants, or other small participants, to exploit opportunities at their expense, but this is the nature of competition; the materiality of this was unclear, as was the effect on net competition, investment and consumers.

Suggested changes to the draft legal text

One respondent to the Report Phase Consultation (EDF Energy) provided substantial comments on the legal text for the Proposed and Alternative Modifications, following on from comments supplied during the Assessment Procedure. Based on these comments we recommend that changes should be made to clarify the legal text and ensure it fully reflects the P315 solutions.

We recommended that the following changes should be made to the legal text for the P315 Proposed and Alternative Modifications:

- Change 'consumption' to 'volume' wherever this can be done to clarify the meaning of terms (but not where there would be any risk of adverse interactions with existing defined terms in Section S);
- Add a new section (b) in Section V paragraph 4.2.10 to clarify explicitly what will be reported alongside the SVA data, i.e. for the CVA Import; and
- Add a new Table X-9 that shows the relationship between the Supplier Volume Reporting Groups and constituent CCCs/PCs, and some additional explanatory text.

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Report Phase Consultation Responses

The Panel noted the responses to the Report Phase Consultation, and that respondents were split between those who believed the P315 Alternative Modification is better than the baseline and those who do not. Three respondents agreed with the Panel's initial recommendation that the P315 Alternative Modification should be approved and four disagreed (though one of these was effectively neutral, as made clear by their rationale).

Changes to the draft legal text

The Panel considered the recommended changes to the P315 Proposed and Alternative legal text and noted that the respondent who had submitted comments on the legal text was satisfied with the recommended changes. The Panel believed that all three changes would clarify the P315 solution in the BSC and agreed that the changes should be made.

The final legal text in Attachments A and B therefore include the following changes from the draft legal text that was consulted upon and attached to the Draft Modification Report:

- Changed 'consumption' to 'volume' wherever possible to clarify the meaning of terms (but not where there would be any risk of adverse interactions with existing defined terms in Section S), which entailed the following changes:
    - Six instances of "Supplier Quarterly Consumption Report" replaced with "Supplier Quarterly Volume Report" and the General Description in Table 7 revised to "volume" accordingly;
    - 16 instances of "Supplier Consumption Reporting Group" replaced with "Supplier Volume Reporting Group"; and
    - Six instances of "Quarterly Supplier Energy Consumption" replaced with "Quarterly Supplier Energy Volume".
- Added the following new section (b) in Section V paragraph 4.2.10 to clarify explicitly what will be reported alongside the SVA data, i.e. for the CVA Import:

(b) the sum of BM Unit Metered Volumes for each Party that also has Supplier BM Units registered, summed for all BM Units which:

(i) are not Supplier BM Units; and

(ii) are not located at premises occupied for purposes of operating a Licensable Generating Plant,

for all half hour periods in which BM Unit Metered Volume is negative.

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- Added the following new Table X-9, which shows the relationship between the Supplier Volume Reporting Groups and their constituent CCCs/PCs, and additional explanatory text:

Table X–9

List of Supplier Volume Reporting Groups and associated relationships used for the purposes of the Supplier Quarterly Volume Report determined according to paragraph 9A of Annex S-2:

Supplier Volume Reporting Group	Consumption Component Classes	Profile Classes (where used and/or applicable)
1	17, 18, 20, 21	1, 2
2	17, 18, 20, 21	3, 4
3	17, 18, 20, 21	5, 6, 7, 8
4	19, 22	Not used
5	32, 33, 34, 35	Not used
6	1, 3, 4, 9, 11, 12, 23, 25, 26, 28, 30, 31	Not applicable
7	2, 5, 10, 13	Not applicable
8	6, 7, 8, 14, 15, 16	Not applicable

For the Supplier Quarterly Volume Report as set out in paragraph 4.2.10 of Section V, the Supplier Volume Reporting Groups with the numbers in the far left column of the table above shall be given the following descriptive labels in the actual report:

1. "Non half hourly metered import, Profile Classes 1 and 2";
2. "Non half hourly metered import, Profile Classes 3 and 4";
3. "Non half hourly metered import, Profile Classes 5, 6 , 7 and 8";
4. "Non half hourly unmetered import";
5. "Non half hourly metered export";
6. "Half hourly metered import";
7. "Half hourly unmetered import "; and
8. "Half hourly metered export".

Panel's final views

A Panel Member reiterated a concern that if the Authority did not agree with the P315 reporting thresholds there was a risk that P315 could be rejected even if it otherwise believed the Modification to be better than the existing baseline.

The Panel considered whether P315 was the best means of ensuring the Transmission Company receives the information it needs. The Transmission Company Representative

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noted that the information that would be supplied under P315 would be useful, and the Transmission Company therefore supported the Modification; this support is strengthened for the Alternative Modification due to its inclusion of historical data immediately upon implementation.

The Panel considered that it was therefore clear that P315 would have benefits for the Transmission Company and, even if there might be a more effective means of delivering information to the Transmission Company, P315 was the only solution currently put forward and had to be considered on its merits.

The same Panel Member that had abstained from giving an initial view on P315 also abstained from giving a final view with respect to the Applicable BSC Objectives or the P315 recommendations. Though this Member abstained, there were seven voting members at the meeting, compared with six at the meeting where initial views were obtained - this is reflected in the summary table below.

The views of the Panel Members that believed P315 would better facilitate the Applicable BSC Objectives compared to the baseline were unchanged.

The views of the Panel Member whose initial view was that P315 would not better facilitate the Applicable BSC Objectives was slightly modified. Their overall view on the Proposed Modification was unchanged, but they now believed that the Alternative Modification would, on balance, have a neutral impact on the facilitation of the BSC Objectives. This is because the Member now believed that both the Proposed and Alternative Modification would have a marginally beneficial impact with respect to Objective (b) and that the Alternative would have a neutral impact on Objective (c). These revised views are reflected in the summary table below.

Does P315 better facilitate the Applicable BSC Objectives compared to the baseline?		
Obj	Proposed Solution	Alternative Solution
(b)	• **Yes** (unanimous) The Transmission Company would benefit from having greater visibility of SVA embedded generation and therefore improve their demand forecast and charging activities. If BSC Parties can take advantage of the P315 data to improve their forecasting, there would be less imbalance volume for the Transmission Company to manage. One Member believed the benefit to be marginal and was not convinced this is the best way to address National Grid forecasting requirements.	• **Yes** (unanimous) The benefits identified for the Proposed Modification apply, but would be greater due to more market data being released under the Alternative Modification. One Member believed the benefit to be marginal and was not convinced this is the best way to address National Grid forecasting requirements.

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Does P315 better facilitate the Applicable BSC Objectives compared to the baseline?		
Obj	Proposed Solution	Alternative Solution
(c)	• **Yes** (6 Members) Though the benefit is marginal, competition would be facilitated by existing BSC Parties and new entrants being better able to understand Supplier market shares which would: • provide all parties, including new entrants, with equal access to basic market share information; and • encourage new entrants due to better visibility of the market. • **Detrimental** (1 Member) The market is already transparent compared with other industries; increased transparency of the kind proposed by P315 is not necessary and could be detrimental. The P315 information appears more useful to incumbents, so could have a negative impact on competition.	• **Yes** (6 Members) Though still marginal, the benefits identified for the Proposed Modification apply, but would be greater due to more market data being released under the Alternative Modification. • **Neutral** (1 Member) The market is already transparent compared with other industries. The contended benefits are not clear and the increased transparency of the kind proposed by P315 is not necessary and could be detrimental. The P315 information appears more useful to incumbents, so could have a negative impact on competition.

The Panel confirmed its initial views that:

- Both P315 Proposed and Alternative Modifications do better facilitate Applicable BSC Objective (b) when compared to the baseline (unanimous view);
- Both P315 Proposed and Alternative Modifications do marginally better facilitate Applicable BSC Objective (c) when compared to the baseline (majority view); and
- The Alternative Modification is better than the Proposed Modification with respect to both Objective (b) and Objective (c) (unanimous view).

Implementation approach

The Panel confirmed the implementation approach for both the P315 Proposed and Alternative Modifications, as set out in Section 7, should either solution be approved.

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13 Recommendations

The BSC Panel recommends to the Authority:

- That the P315 Alternative Modification should be **approved** and that the P315 Proposed Modification should be **rejected**;
- An Implementation Date for the P315 Proposed Modification of:
  - 30 June 2016 if an Authority decision is received on or before 22 October 2015; or
  - 3 November 2016 if an Authority decision is received after 22 October 2015 but on or before 25 February 2016;
- An Implementation Date for the P315 Alternative Modification of:
  - 30 June 2016 if an Authority decision is received on or before 22 October 2015; or
  - 3 November 2016 if an Authority decision is received after 22 October 2015 but on or before 25 February 2016;
- The BSC legal text for the P315 Proposed Modification; and
- The BSC legal text for the P315 Alternative Modification.

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Appendix 1: Workgroup Details

Workgroup's Terms of Reference

Specific areas set by the BSC Panel in the P315 Terms of Reference
The Workgroup will carry out an Assessment Procedure for Modification Proposal P315 in accordance with Section F2.6 of the Balancing and Settlement Code.
The Workgroup will produce an Assessment Report for the BSC Panel Meeting on 11 June 2015.
The Workgroup will consider and/or include in the Assessment Report as appropriate: a) What is demand for this data across the industry? b) How should the data be published? i) Channel of publication ii) Format of data iii) Frequency of publication c) What are the impacts on Parties' systems to implement P315? d) What is the most appropriate Implementation Date for P315? e) What changes are needed to BSC documents, systems and processes to support P315 and what are the related costs and lead times? f) Are there any Alternative Modifications? g) Does P315 better facilitate the Applicable BSC Objectives than the current baseline?

Assessment Procedure timetable

Proposed Progression Timetable for P315	
Event	Date
Present Initial Written Assessment to Panel	09 Oct 14
Workgroup Meeting 1	24 Oct 14
Central Systems and Industry Impact Assessment	12 Nov 14 – 03 Dec 14
Workgroup Meeting 2	09 Dec 14
Workgroup Meeting 3	19 Jan 15
Assessment Procedure Consultation	09 Feb 15 – 27 Feb 15
Workgroup Meeting 4	09 Mar 15
Present Assessment Report to Panel	09 Apr 15
Assessment Procedure Consultation v2.0	20 Apr 15 – 11 May 15
Workgroup Meeting 5	18 May 15
Workgroup Meeting 6 (teleconference)	19 June 15
Assessment Procedure Consultation v3.0	1 Jul 15 – 21 Jul 15
Workgroup Meeting 7	28 Jul 15
Workgroup Meeting 8 (teleconference)	30 Jul 15
Present Assessment Report to Panel	13 Aug 15

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Workgroup membership and attendance

P315 Workgroup Attendance									
Name	Organisation	24 Oct 14	09 Dec 14	19 Jan 15	09 Mar 15	18 May 15	19 Jun 15	28 Jul 15	29 Jul 15
Members									
Dean Riddell	ELEXON *(Chair)*	✓	✓	✓	✓	✓	☎	✓	✓
Oliver Xing	ELEXON *(Lead Analyst)*	✓	✓	✓	✓	✓	☎	✓	✓
Colin Prestwich	SmartestEnergy *(Proposer)*	✓	✓	✓	✓	✓	☎	✓	✓
Phil Russell	Independent Consultant	✓	✓	✓	✓	✓	☎	✓	☎
Greg Mackenzie	British Gas	✓	☎	✓	✓	✓	☎	✗	☎
Walter Hood	IBM on behalf of ScottishPower	☎	✓	✓	✓	✓	☎	✓	☎
Phil Hewitt	Enappsys	✓	☎	✓	✓	✓	☎	✗	☎
Esther Sutton	E.ON	✓	✓	☎	☎	✗	✗	✗	✗
Andy Colley	SSE	✗	✓	✓	✓	✓	✗	✓	✓
Attendees									
Matthew McKeon	ELEXON *(Design Authority)*	✓	✓	✓	✓	✓	☎	✓	✓
Geoff Norman	ELEXON *(Lead Lawyer)*	✗	✗	✓	✓	✓	✗	✓	✗
Monica Gandolfi	Ofgem	✓	✓	✓	✓	✓	☎	✓	✗
Tom Edwards	Cornwall Energy	✗	✗	✗	☎	☎	☎	☎	✗

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Appendix 2: Glossary & References

Acronyms used in this document are listed in the table below.

Glossary of Defined Terms	
Acronym	Definition
ACCC	Aggregate Consumption Component Class
BMU	Balancing Mechanism Unit
BSC	Balancing and Settlement Code
CCC	Consumption Component Class
CfD	Contract for Difference
CMA	Competition and Markets Authority
CSD	Code Subsidiary Document
CVA	Central Volume Allocation
DF	Dispute Final
DNO	Distribution Network Operator
DTC	Date Transfer Catalogue
DUoS	Distribution Use of System
ECOES	Electricity Central Online Enquiry Service
EMR	Electricity Market Reform
GSP	Grid Supply Point
HH	Half Hourly
IDD	Interface Definition Document
LEG	Licence Exemptible Generator
LLFC	Line Loss Factor Class
MPAN	Metering Point Administration Number
MPID	Market Participant Identifier
NHH	Non Half Hourly
PC	Profile Class
R1	First Reconciliation Volume Allocation
RF	Final Reconciliation Volume Allocation
SSC	Standard Settlement Configuration
SVA	Supplier Volume Allocation
SVAA	Supplier Volume Allocation Agent
TPR	Time Pattern Regime
URS	User Requirements Specification

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DTC data flows and data items

DTC data flows and data items referenced in this document are listed in the table below.

DTC Data Flows and Data Items	
Number	Name
D0018	Daily Profile Data Report
D0030	Non Half Hourly Distribution Use of System (DUoS) Report
D0081	Supplier Half Hourly Demand Report
D0082	Supplier Purchase Matrix Report
D0276	GSP Group Consumption Totals Report
D0362	Contract for Difference (CfD) Supplier Invoice Backing Data

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
3, 15, 16	P315 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p315/
5	SAA-I0141 (Settlement Report sub flow 1) description	https://www.elexon.co.uk/wp-content/uploads/2014/07/neta_idd_part_1_v31.0.pdf
5	SAA-I0142 (Settlement Report sub flow 2) description	https://www.elexon.co.uk/wp-content/uploads/2014/11/neta_idd_part_2_v31.0.pdf
5	SAA-I0143 (Settlement Report sub flow 3) description	https://www.elexon.co.uk/wp-content/uploads/2014/11/neta_idd_part_2_v31.0.pdf
5	DTC website	http://dtc.mrasco.com/Default.aspx
5	Data flow descriptions on the DTC website	http://dtc.mrasco.com/ListDataFlows.aspx
9	P114 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p114-entitlement-of-licence-exemptable-generators-legs-and-other-non-trading-parties-to-bsc-membership-without-evidence-of-trading/
26	CMA's 'Transparency and disclosure: Statement of the CMA's policy and approach' guidance document	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/270249/CMA6_Transparency_Statement.pdf
26	Official Journal of the European Union	http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C:2011:011:FULL&from=EN

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Annex 1: Definition of Supplier Consumption Reporting Groups

The Supplier Market Share Summary Data under both the Proposed and Alternative Modifications would contain the following Supplier Consumption Reporting Groups, for both aggregated Metered Volume and averaged MPAN number, be reported for each Supplier (unless they fall below both domestic and non-domestic reporting thresholds) for each calendar quarter using the R1 Run data.

P315 would introduce the term 'Supplier Consumption Reporting Group' to the BSC. Supplier Consumption Reporting Groups simply describe the breakdown of types of SVA energy volumes (both import and export) for Suppliers according to their characteristics in order to define how they would be reported under P315. There are domestic and non-domestic Supplier Consumption Reporting Groups. The attributes of each Supplier Consumption Reporting Group are summarised in the table below, in terms of:

- Measurement Quantity ID, i.e. Active Import (AI) or Active Export (AE);
- Data Aggregation Type, i.e. Half Hourly (H) or Non Half Hourly (N); and
- Whether Metered (M) or Unmetered (U).

Please note that Supplier Consumption Reporting Groups were renamed from the Aggregate Consumption Component Classes (ACCCs) as described in the previous P315 documents. This is for the avoidance of technical contradiction as Profile Classes are not an attribute of Consumption Component Classes.

The Supplier Consumption Reporting Groups will contain the following:

Supplier Consumption Reporting Group	**Measurement Quantity ID**	**Data Aggregation Type**	**Metered/ Unmetered Indicator**
Non Half Hourly Metered Import (Profile Classes 1 and 2)	AI	N	M
Non Half Hourly Metered Import (Profile Classes 3 and 4)	AI	N	M
Non Half Hourly Metered Import (Profile Classes 5, 6 , 7 and 8)	AI	N	M
Non Half Hourly Unmetered Import	AI	N	U
Non Half Hourly Export	AE	N	M
Half Hourly Metered Import	AI	H	M
Half Hourly Unmetered Import	AI	H	U

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Half Hourly Export	AE	H	M

In addition, ELEXON would obtain CVA import volume for Suppliers using the R1 Run SAA-I0143 data. This can be done by deriving the total import Metered Volumes applicable to BM Units which are liable for Supplier CfD payments (summed over each reporting quarter) for each Supplier for which the value is not equal to zero (and multiply it by -1 so that it is reported as a positive value). This CVA import data would be added to the Supplier Market Share Summary Data report for completeness.

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Annex 2: Example format of the Supplier Market Share Summary Data

	PC1-2 NHH Import MPAN	PC3-4 NHH Import MPAN	PC5-8 NHH Import MPAN	HH Import MPAN	HH Unmetered MPAN	NHH Unmetered MPAN	HH Export MPAN	NHH Export MPAN
Supplier A	.	.	.	.	.	.	.	.
Supplier B	.	.	.	.	.	.	.	.
Supplier C	.	.	.	.	.	.	.	.
Supplier D	.	.	.	.	.	.	.	.
Supplier E	.	.	.	.	.	.	.	.

	PC1-2 NHH Import MWh	PC3-4 NHH Import MWh	PC5-8 NHH Import MWh	HH Import MWh	HH Unmetered MWh	NHH Unmetered MWh	HH Export MWh	NHH Export MWh	CVA Import MWh[13]
Supplier A	.	.	.	.	.	.	.	.	.
Supplier B	.	.	.	.	.	.	.	.	.
Supplier C	.	.	.	.	.	.	.	.	.
Supplier D	.	.	.	.	.	.	.	.	.
Supplier E	.	.	.	.	.	.	.	.	.

[13] CVA Import volume would be extracted from SAA-I0143 and be appended to Supplier Market Share Summary Data.

Annex 3: Format of 'GSP Group Market Matrix Report'

Group	Group Description	Range	Condition	L1	L2	L3	L4	L5	L6	Item Name
HDR		1		G						
					1					Settlement Date
					1					Settlement Code
					1					Settlement Code Description
					1					SSR Run Date
					1					SSR Run Number
					1					SSR Run Type Id
GSP		0-*			G					
						1				GSP Group Id
						1				GSP Group Name
CON		0-*					G			
								1		Profile Class Id
								1		Standard Settlement Configuration Id
								1		Line Loss Factor Class Id
								1		Distributor Id
								1		Time Pattern Regime
								1		SPM Total EAC Report Value
								1		SPM Total EAC MSID Count
								1		SPM Total Annualised Advance Report Value
								1		SPM Total AA MSID Count
								1		SPM Total Unmetered Consumption Report Value
								1		SPM Total Unmetered MSID Count
								1		SPM Default EAC MSID Count
								1		SPM Default Unmetered MSID Count

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