

Assessment Procedure Consultation Responses

P315 'Publication of Gross Supplier Market Share Data' v2.0

This Assessment Procedure Consultation was issued on 21 April 2015, with responses invited by 12 May 2015.



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

| Respondent | No. of Parties/Non-Parties Represented | Role(s) Represented |
|--|--|--|
| SmartestEnergy | 1/0 | Supplier |
| Opus Energy Limited | 1/0 | Supplier |
| Cornwall Energy | 0/1 | Other |
| Spark Energy | 1/0 | Supplier |
| ScottishPower | 1/0 | Supplier |
| GDF SUEZ Energy UK | 1/0 | Supplier |
| Good Energy Limited | 1/0 | Supplier/ECVNA/MVRNA |
| British Gas | 1/0 | Supplier |
| Power Data Associates Ltd | 0/1 | Supplier Agent |
| EDF Energy | 9/0 | Generator; Supplier; Non Physical Trader; ECVNA; MVRNA; Supplier Agent |
| National Grid Electricity Transmission plc | 1/0 | Transmission Co. |
| EnAppSys Ltd | 0/1 | Other - Data Provision, Analysis and consultancy |
| E.ON | 7/0 | Generator; Supplier; Non Physical Trader; Interconnector User |

P315
Assessment Consultation
Responses V2.0

12 May 2015

Version 1.0

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Question 1: Do you agree with the Workgroup’s initial unanimous view that P315 Proposed solution does better facilitate the Applicable BSC Objectives than the current baseline?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 6 | 1 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------------|----------|---|
| SmartestEnergy | Yes | N.A |
| Opus Energy Limited | No | <p>1) We do not agree with the proposer’s reasons for raising this modification. There is no real justification provided, only a loose reason citing improved competition. This view was shared by a number of respondents for the previous consultation stage.</p> <p>2) As referenced within the proposal, suppliers already receive the D0276 GSP Group Consumption Totals Report which reports gross supply volumes for each supplier, but not broken down by Profile Class (PC). We do not believe that the additional split by PC is justified (even if, for some of the data PC groups are amalgamated) – the information is commercially sensitive, and hence should not be made publically available but should remain confidential. The information currently available via consultants is pulled together from data that suppliers provide to those consultants but this is the supplier’s choice and doesn’t necessarily mean there is an argument for the data to be published as per the proposal. FOI requests have also been referenced as part of the P315 consultation process, which we would wish to point out are subject to certain rules around whether the data can be released, it is not an automatic method of getting hold of the information, so again a loose supporting reason for the proposal.</p> <p>3) We share the concerns of a number of respondents to the previous consultation round regarding the commercial sensitivity of the proposed published data. Even with the Workgroup’s proposed changes to address some of these concerns, we believe that, rather than meeting the BSC Objective to promote competition, in particular from an independent supplier perspective (including</p> |

| Respondent | Response | Rationale |
|-----------------|----------|--|
| | | <p>new market entrants) publication of this granularity of data could act as a barrier to competition. This is because larger suppliers in particular could potentially identify the customer type and region for which other suppliers are gaining customers and utilise their resources to reduce levels of customer switching.</p> <p>4) The majority of responses (nine to five) were opposed to this change, mainly based upon concerns of disclosure of commercially sensitive information. We share the view of some of the other respondents that the proposed solutions seek to resolve a matter for which there is no obvious defect. Given their relative complexity, we would have liked to have seen some illustrative examples from Elexon to help us impact assess the proposals. We ultimately put together our own examples as part of our analysis. The solutions appear to involve large volumes of complex data which independent suppliers in particular may have limited resource to fully utilise.</p> |
| Cornwall Energy | No | <p>Firstly we welcome the Panel's decision to send back P315 to the workgroup for a second consultation. This recognises the wide range of concerns raised by the industry in regards to the modification which the workgroup has still not sufficiently addressed, particularly that the majority of respondents stated that implementation would harm the BSC competition objectives compared to the baseline.</p> <p>We do not agree that the proposed solution better meets the BSC objectives than the baseline. We believe it will be detrimental to competition, and thus BSC objective (c) by exposing un-necessarily the retail positions by customer type and region of all suppliers thus removing from them competitive advantages they discover in the market.</p> <p>We do not believe that the rationale put forward by the modification group that radically increasing market transparency by publishing commercially sensitive information will promote effective competition. This reasoning has not been successfully argued by the proposer or workgroup members at any point in the modification's development, nor has any evidence been presented to show that the current arrangements are insufficient or unfit for purpose.</p> |

| Respondent | Response | Rationale |
|--------------|----------|---|
| | | <p>We also disagree with the argument that increasing transparency of data will result in a notable increase in the efficiency of trading by BSC parties, who already have access to large quantities of data, and we believe any benefits to increased trading efficiency could only be marginal and accruable to larger already sophisticated parties. Finally we consider that the volume of data the modification and its alternative proposes to issue will unfairly advantage larger parties. This is because only well-resourced companies are likely to have the ability to interpret and use this information in a meaningful manner, providing parties with a further a competitive advantage.</p> |
| Spark Energy | No | <p>Firstly we welcome the Panel's decision to send back P315 to the workgroup for a second consultation. This recognises the wide range of concerns raised by the industry in regards to the modification which the workgroup has still not sufficiently addressed, particularly that the majority of respondents stated that implementation would harm the BSC competition objectives compared to the baseline.</p> <p>We do not agree that the proposed solution better meets the BSC objectives than the baseline. We believe it will be detrimental to competition, and thus BSC objective (c) by exposing un-necessarily the retail positions by customer type and region of all suppliers thus removing from them competitive advantages they discover in the market.</p> <p>We do not believe that the rationale put forward by the modification group that radically increasing market transparency by publishing commercially sensitive information will promote effective competition. This reasoning has not been successfully argued by the proposer or workgroup members at any point in the modification's development, nor has any evidence been presented to show that the current arrangements are insufficient or unfit for purpose.</p> <p>We also disagree with the argument that increasing transparency of data will result in a notable increase in the efficiency of trading by BSC parties, who already have access to large quantities of data, and we believe any benefits to increased trading efficiency could only be marginal and accruable to larger already sophisticated parties.</p> |

| Respondent | Response | Rationale |
|---------------------|----------|---|
| | | Finally we consider that the volume of data the modification and its alternative proposes to issue will unfairly advantage larger parties. This is because only well-resourced companies are likely to have the ability to interpret and use this information in a meaningful manner, providing parties with a further a competitive advantage. |
| ScottishPower | Yes | We believe that the proposal to produce the quarterly ACCC volumes in MWh and quarterly averaged MPAN counts for each Supplier at GB level better facilitates Applicable BSC Objective (c) in that it provides market share information to anyone that wishes to utilise it going forward. However we do not agree with the publication of the D0276 for all run types on the Elexon Portal as we agree with the proposer's view that it does not provide sufficient transparency to understand Suppliers gross consumption within the retail market. |
| GDF SUEZ Energy UK | No | <p>In reference to BSC (c), the proposed modification will not achieve the desired result of increased market competition via visibility of higher granularity market share data. Indeed, it may have the converse affect by exposing new/small market entrants to expose their portfolio and thereby highlight their growth aspirations in particular segments of the marketplace.</p> <p>In addition we have had no actual evidence to date of the preposition 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.</p> |
| Good Energy Limited | No | The present Assessment Procedure Consultation does not seek to address many of the concerns raised by respondents to the previous consultation including the need for a proper justification of the proposal. Without a clear explanation of from where any perceived cost benefit arises from the P315 Proposed solution we are of the view that it does not better facilitate Applicable BSC Objective (d) because it imposes costs that will ultimately be borne by customers for no quantified benefit. We also do not consider that P315 will better facilitate Applicable BSC Objective (c), and is more likely to have the opposite effect. It would facilitate larger market participants with access to the required resources to analyse and process the data being |

| Respondent | Response | Rationale |
|---------------------------|----------|--|
| | | <p>able to drive out competition from smaller participants.</p> <p>We consider P315 to be neutral to the other Applicable BSC Objectives.</p> |
| British Gas | Yes | We agree with the Workgroup that the Proposed solution better facilitates applicable objective 'C' than the current baseline. This will help potential entrants as well as new entrants understand supplier market shares. |
| Power Data Associates Ltd | Yes | Transparency of information will enable more informed competition. |
| EDF Energy | Neutral | <p>The proposed legal text is insufficiently detailed to say whether or not the proposal would better facilitate the BSC Objectives. We make detailed comments and suggestions on the legal text later in this response.</p> <p>In any case, the benefits of transparency in meeting BSC objectives are hard to quantify. The BSC is already more transparent than most other market arrangements, and the value of additional transparency is uncertain. The net benefit of a particular level of transparency compared to the administrative cost of delivering it and using it is necessarily subjective.</p> <p>If the legal text were to reflect the intent expressed in the assessment consultation document, for which central costs are indicated, we think there is a good chance that BSC Objectives would be better met overall.</p> <p>The proposal is very similar to the "Option A" solution described in previous consultation, with quarterly aggregate reporting instead of monthly aggregates, and 8 aggregation classes instead of 13. However the central implementation cost for the proposal is estimated at 98 £k (page 10 of consultation) compared with 44.3 £k previously (pages 27,29). Most of the more complex combinations of options described previously were less than the cost now estimated for the proposal. It is disappointing that the costs seem to have risen so significantly, and Elexon should explain the reasons.</p> <p>As in previous consultation, we see potential benefits in increased transparency, but it is difficult to place a value on this, either in terms of better</p> |

| Respondent | Response | Rationale |
|------------|----------|--|
| | | <p>meeting BSC Objectives or improving service to end customers. However, there would be firm non-trivial costs to make changes to current central systems reporting, and if more data is made available, many parties will expend effort analysing it simply to determine whether it is of use.</p> <p>The currently proposed legal text does not provide sufficient detail about the solution to be sure about its eventual granularity or its cost. The legal text would support much less or much more granularity in reporting, because significant detail is left to be decided or changed in subsidiary documents outside the modification process. This makes it difficult to make a judgement on the proposal relative to baseline. This seems surprising given the apparent sensitivity of some stakeholders to this detail. If the proposal were to lead to significant expenditure beyond that envisaged in the assessment report, we suspect that expenditure would not be justified. On the other hand, if the solution were over-simplified to reduce cost it might not provide the value that is anticipated by its supporters.</p> <p>Some details of the proposed solution are described in the assessment consultation document, but are not described in the legal text and therefore have no solid foundation. The apparent sensitivity of some stakeholders to the granularity and timing of data, and the cost of potential approaches which would be in scope of the currently presented legal text make it difficult to form a firm view on the proposal.</p> <p>We repeat here comments made in our response to the previous consultation on P315:</p> <p>Visibility of aggregate gross export and import for sites in various classes within a GSP Group has potential to better meet BSC objective (b) concerning efficient system operation, by providing visibility of the underlying activities of generation and demand, which have different time-dependent behaviours. This visibility of historic volumes could help improve forecasting and balancing by the System Operator and participants. It may also better facilitate BSC objective (c) concerning competition, by providing information on the potential market for different activities. However, visibility at aggregate level already exists, so it is not clear what additional benefit the proposal would</p> |

| Respondent | Response | Rationale |
|--|----------|--|
| | | <p>bring.</p> <p>Increased visibility of Suppliers' individual portfolios broken down by classifications such as Component Class and Profile Class might better achieve BSC Objective (c) concerning competition, by allowing suppliers to identify their competitor's portfolios, and evolution of those portfolios, providing opportunity to target particular market sectors more effectively. However, there is no clear evidence that this would occur, and no materiality has been provided in the assessment.</p> <p>The proposal would obviously make implementation and administration of the BSC more complex and expensive for all concerned, and therefore cannot better meet BSC Objective (d) concerning efficiency in implementation and administration of the BSC arrangements. More complex proposals would require more effort centrally and by participants to make use of the data made available, and therefore would require more benefit under other objectives in order to meet BSC Objectives overall.</p> <p>The simplest option has small central costs, does not impose IT interface costs on participants not wishing to use the data, and would require minimal effort for participants to use. With no clear materiality for the benefits under other BSC Objectives, it seems the most likely to better meet BSC Objectives overall.</p> |
| National Grid Electricity Transmission plc | Yes | <p>We agree with the WG that the P315 Proposed solution better facilitates Applicable BSC Objective (c) compared to the current baseline as the increased transparency as a result of the additional data is likely to increase general understanding of how the market operates and thus support competition.</p> <p>Furthermore, we also believe that the P315 Proposed solution better facilitates Applicable BSC Objective (b) compared to the current baseline as the additional information available will be beneficial to the Transmission Company (alongside our existing processes and data sources) both in relation to our demand 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.</p> |

| Respondent | Response | Rationale |
|--------------|----------|---|
| EnAppSys Ltd | Yes | Our opinion was expressed in the workgroup and documented in the report. |
| E.ON | No | <p>We neither strongly support nor object to this proposal but overall are not convinced that it would be an improvement or the work or cost involved justified, especially when the industry has to cope with many forthcoming changes. Potentially P315 could be detrimental under Objectives C and D.</p> <p>Publishing more granular Supplier market share data would in theory be transparent, and we do support greater visibility of the true level of demand, gross of embedded generation's 'negative demand'. We also believe that consultants' data is often inaccurate due to re-submissions whereas actuals should be accurate. Provided that all Suppliers are in the same position there is no strong concern in relation to commercial sensitivity. However, voluntary provision of some data to consultants does not necessarily mean that such publication should be mandatory. Publishing a very large amount of data also risks actually impeding transparency and fundamentally we are not convinced that at any granularity it would really promote competition or benefit the consumer.</p> <p>We are also concerned that implementing this proposal would be an unnecessary additional burden when many system changes are ongoing/forthcoming; with P315 offering no particular benefit to anyone either active in or considering entering the market.</p> |

Question 2: Do you agree with the Workgroup's initial unanimous view that P315 Alternative solution does better facilitate the Applicable BSC Objectives than the current baseline?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 6 | 1 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------------|----------|---|
| SmartestEnergy | Yes | N.A |
| Opus Energy Limited | No | In line with our response to Question 1, we share the concerns of a number of respondents to the previous consultation round regarding the commercial sensitivity of the proposed published data – this applies to both the Proposed and Alternative solutions. Even with the Workgroup's proposed changes to address some of these concerns, we believe that, rather than meeting the BSC Objective to promote competition, in particular from an independent supplier perspective (including new market entrants) publication of this granularity of data could act as a barrier to competition. This is because larger suppliers in particular could potentially identify the customer type and region for which other suppliers are gaining customers and utilise their resources to reduce levels of customer switching. |
| Cornwall Energy | No | We consider that the alternative will be detrimental to competition in the same manner as the proposed modification. In addition the extra requirement to publish D0082 data will further harm competition by revealing additional commercial information and be further detrimental to objective (d) by imposing further costs on suppliers and increasing the additional publication requirements that will have to be managed. |
| Spark Energy | No | We consider that the alternative will be detrimental to competition in the same manner as the proposed modification. In addition the extra requirement to publish D0082 data will further harm competition by revealing additional commercial information and be further detrimental to objective (d) by imposing further costs on suppliers and increasing the additional publication requirements that will have to |

| Respondent | Response | Rationale |
|---------------------------|----------|--|
| | | be managed. |
| ScottishPower | Yes | Similar to Question 1 above, we believe that the proposal to produce the quarterly ACCC volumes in MWh and quarterly averaged MPAN counts for each Supplier at GB level better facilitates Applicable BSC Objective (c) in that it provides market share information to anyone that wishes to utilise it going forward. Similarly, while we believe that the D0276 flow does provide sufficient transparency, we believe the inclusion of the D0082 report can provide the transparency that the market may wish to view. |
| GDF SUEZ Energy UK | No | See above. |
| Good Energy Limited | No | Our rationale is the same as set out above in response to Question 1. |
| British Gas | Yes | We agree with the workgroup that the Alternative Solution better facilitates applicable objective 'C' than the current baseline. |
| Power Data Associates Ltd | Yes | Transparency of information will enable more informed competition. |
| EDF Energy | Neutral | <p>As for the proposal, the proposed alternative legal text is insufficiently detailed to say whether or not the alternative proposal would better facilitate the BSC Objectives.</p> <p>If the legal text were to reflect the intent expressed in the assessment consultation document, for which central costs are indicated, we think there is a good chance that BSC Objectives would be better met overall. We are uncertain whether the additional information in an aggregated D0082 (GSP level aggregate numbers of NHH meters and annual NHH energy in each class in each settlement run, derived from Supplier Purchase Matrix) would add value. However, the additional cost is modest and impact on parties' operational processes minimal.</p> <p>The consultation document indicates that the additional reporting made available in the alternative proposal, over and above that in the proposal itself, is expected to add about 19 £k to the central implementation cost of 98 £k for the proposal.</p> <p>The alternative is similar to the "Option (a)" + "Option (d)" solution described in previous consultation, with quarterly aggregate reporting</p> |

| Respondent | Response | Rationale |
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| | | instead of monthly aggregates, and 8 aggregation classes instead of 13, with a new aggregated D0082 (Supplier Purchase Matrix) data flow, instead of wider reporting of multiple existing flows. However the central implementation cost for the proposal is estimated at 117 £k (page 10) compared with 61 £k previously (page 30). Most of the more complex combinations of options described previously were less than the cost now estimated for the proposal. |
| National Grid Electricity Transmission plc | Yes | <p>As above, we agree with the WG that the P315 Alternative solution also better facilitates Applicable BSC Objective (c) compared to the current baseline as it proposes publishing more information than the Proposed solution and we cannot identify anything obviously detrimental to competition associated with this incremental increase in published information that would outweigh the positives outlined for the Proposed solution.</p> <p>For similar reasons, we believe that the P315 Alternative solution also better facilitates Applicable BSC objective (b) compared to the current baseline.</p> |
| EnAppSys Ltd | Yes | Our opinion was expressed in the workgroup and documented in the report. |
| E.ON | No | The Alternative Solution adds more data request to the proposal. As discussed in Question 1 we neither strongly support nor object to the proposal because we are not convinced the benefits outweigh the costs involved. The alternative will involve more system and administration work and data publication than the proposal. Hence for the same reason as the proposal we stay neutral for Question 2. |

Question 3: Do you agree with the Workgroup's initial unanimous view that P315 Alternative solution does better facilitate the Applicable BSC Objectives compared with the P315 Proposed solution?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 7 | 6 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------------|----------|---|
| SmartestEnergy | Yes | N.A |
| Opus Energy Limited | No | In line with our response to Questions 1 and 2 above, we are opposed to both the Proposed and Alternative solutions because we believe that the disclosure of this granularity of data will hinder competition and innovation rather than help. The Alternative solution includes a new Suppliers aggregated D0082 report for which, although Suppliers are aggregated (which is preferable than disclosing individual Supplier Ids) is still broken down by Profile Class and GSP. There is a risk that the collective use of these data sources would enable larger suppliers in particular, to utilise their resources to identify other supplier acquisition activity and potentially to reduce levels of customer switching. |
| Cornwall Energy | No | Both proposals are equally damaging to competition as they will disclose very detailed information about retail competition, effectively removing any competitive niches that suppliers, particularly new entrants or those operating non-traditional business models, may find by making them quickly visible to competition. Any competitive gain felt as a result of this will be received by the market incumbents rather than independents and so will harm rather than support competition. |
| Spark Energy | No | Both proposals are equally damaging to competition as they will disclose very detailed information about retail competition, effectively removing any competitive niches that suppliers, particularly new entrants or those operating non-traditional business models, may find by making them quickly visible to competition. |

| Respondent | Response | Rationale |
|---------------------------|----------|---|
| | | Any competitive gain felt as a result of this will be received by the market incumbents rather than independents and so will harm rather than support competition. |
| ScottishPower | Yes | While we agree with the Workgroup that the alternative solution provides a better alternative, this view is based on the premise that the D0276 publication is removed and that the alternative proposal should be amended to only produce the quarterly ACCC volumes in MWh and quarterly averaged MPAN counts for each Supplier at GB level and provide a report based on the D0082 data flow. |
| GDF SUEZ Energy UK | No | <p>The issues would remain the same for both P315 and P315 Alternative. Indeed, P315 would exacerbate the potential issues as it would add an additional element to the reporting requirements and add the additional element of the D0082 data, further exposes market participants. The details contained in D0082 (ESP, PC, LLF etc.) could, if utilised be competitors, reveal specific sites and their incumbent supplier, leaving them open to be targeted by larger market participants to the detriment of embryonic businesses.</p> <p>Resource constraints mean that smaller suppliers are less likely to be able to effectively use this data than larger market participants.</p> |
| Good Energy Limited | No | In the absence of a proper justification for either solution we are of the view that the Proposed solution is preferable to the Alternative because it appears to have lower implementation and ongoing costs. |
| British Gas | Yes | We believe the aggregated D0082 report will provide further market information that will be helpful in understanding the daily D0276 report. This will provide parties with a better understanding of Supplier Market Share. |
| Power Data Associates Ltd | Yes | Transparency of information will enable more informed competition. |
| EDF Energy | Yes | Assuming a solution as described in the latest assessment consultation (page 30), we are doubtful that the additional information in an aggregated D0082 (GSP level aggregate numbers of NHH meters and annual NHH energy in each class for each settlement run, derived from Supplier Purchase Matrix) would add much value. However, the additional cost appears modest, estimated at |

| Respondent | Response | Rationale |
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| | | £19k, so the loss would be minimal if the additional feature in the alternative were to turn out to have little value. |
| National Grid Electricity Transmission plc | Yes | <p>We agree with the WG that the P315 Alternative solution better facilitates Applicable BSC Objective (c) than the P315 Proposed solution as we consider the additional information provided under the Alternative (compared to the Proposed) to be beneficial in terms of increasing general understanding of both new and existing market participants and thus supporting competition.</p> <p>In addition, we believe that, due to the increased amount of additional data that is made available under the P315 Alternative solution, this better facilitates objective (b) compared to the Proposed solution. This is because the breakdown of the data in the D0082 by NHH Profile Class may be useful to both our demand forecasting and charge-setting activities.</p> |
| EnAppSys Ltd | Yes | Our opinion was expressed in the workgroup and documented in the report |
| E.ON | No | Following the same argument listed in Question 1 and 2 we are neutral in choosing between the proposal and the alternative. |

Question 4: Do you believe the Proposed Modification and Alternative Modification address the concerns raised around commercial sensitivity of data?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 4 | 7 | 2 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------------|----------|---|
| SmartestEnergy | Yes | The data is now proposed to no longer be available at GSP Group level, but only at national level. The data will also now only be presented quarterly, two months after the end of the quarter. |
| Opus Energy Limited | No | Although measures such as aggregating information by groups of profile classes and providing some of the information at a National level (rather than at GSP level) should, in theory, help to reduce the degree of readily accessible commercially sensitive information, there is a risk that collective use and analysis of these data sources could enable larger suppliers in particular to identify, and potentially take measures to restrict, supplier acquisition activity. |
| Cornwall Energy | No | As stated above neither modification addresses the concerns about confidentiality. The original modification discloses full information by supplier by region and profile type on a mandatory basis. The alternative modification offers the opportunity to achieve the nearly the same objective by combining a new release of data with existing SA0142 flows. Both of these would force parties to publish their commercially sensitive data in manner which could be easily used to identify their customers and commercial strategy. |
| Spark Energy | No | As stated above neither modification addresses the concerns about confidentiality. The original modification discloses full information by supplier by region and profile type on a mandatory basis. The alternative modification offers the opportunity to achieve the nearly the same objective by combining a new release of data with existing SA0142 flows. Both of these would force parties to publish their commercially sensitive data in manner which could be easily used to identify their customers and |

| Respondent | Response | Rationale |
|---------------------------|----------|---|
| | | commercial strategy. |
| ScottishPower | Yes | Given that the data will only be published two months after the quarter end and on a quarterly basis we believe the modification has addressed the concerns around the commercial sensitivity of the data. |
| GDF SUEZ Energy UK | No | If the D0082 data is published at an aggregated level then although this would go towards addressing the issues regarding commercially sensitive data it is also questionable how useful this information would then prove to be. |
| Good Energy Limited | No | We do not believe all concerns have been addressed adequately. As mentioned above we are of the view that both the Proposed Modification and Alternative Modification could facilitate larger market participants with access to the required resources to analyse and process the data being able to drive out competition from smaller participants. |
| British Gas | Yes | We believe the concerns raised around the commercial sensitive nature of the data have been addressed in the new solutions. We believe the 2 month delay in publishing data and the National view of the Market Share data is appropriate to meet the aims of the modification in providing more transparency in the Market. The data flows do not look at individual supplier market shares so would not be commercially sensitive. |
| Power Data Associates Ltd | No | Provision of quarterly data is better than no data but would prefer to see summary data (via website) data provided on a monthly basis. All data should be timely, that is with a one month delay rather than three to six month delay. This is even more important if information is only published quarterly. |
| EDF Energy | Neutral | <p>We are uncertain what eventual solution might be delivered from the currently drafted legal text.</p> <p>It is not clear what these commercial sensitivities are. We don't think the Proposal or Alternative as described in the latest modification consultation raise major concerns of commercial sensitivity. Half-hourly net flows of directly-connected customers are already visible, and total net half-hourly flows of market participants are visible. Despite concerns prior to NETA Go-live, we are not aware of concerns having been raised subsequently. There may be rare occasions when an analyst with other non-BSC information might be able to</p> |

| Respondent | Response | Rationale |
|--|----------|---|
| | | <p>determine the flow of one or a group of smaller individual customers of another supplier as a result of more granular information. Third party analysts may be able to estimate customer business activity from this, but it is not clear that this would act against the interests of customers, of supply competition, or of consumers in general.</p> <p>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.</p> |
| National Grid Electricity Transmission plc | Neutral | N.A |
| EnAppSys Ltd | Yes | <p>The user friendly option has a national and quarterly level of granularity and the publication delay means that it would be difficult to see how the data can be used to aggressively compete for market share. The D276 HH data is a GSP group total by CCC across all suppliers meaning that there is no way to identify an individual supplier's position at the HH level.</p> <p>We still maintain that there is an asymmetry of data transparency in the SVA space compared to the CVA space and this should be opened up to improve market efficiency. We understand that this data is already shared amongst some suppliers and all suppliers have good knowledge of market share moves as they affect them as they know when they gain or lose a customer and to or from whom.</p> |
| E.ON | No | <p>Both proposal and alternative encourage the publication of market share which is commercially sensitive even at the aggregate level which Ofgem occasionally publish. The more granular an individual Supplier's market data, the more commercially sensitive. The data can sometimes highlight a company's business plan. Hence the proposal and the alternative will cause more concerns around the release of the commercially sensitive data although the alternative encourages slightly less data transparency than the proposal.</p> |

Question 5: Do you believe that the proposed licence approach and fee for non-BSC Parties to access the P315 data on the ELEXON Portal is appropriate?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 9 | 2 | 2 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------------|----------|--|
| SmartestEnergy | Yes | N.A |
| Opus Energy Limited | Neutral | We acknowledge from the Consultation that this reflects the principle established under P114 in which non-BSC Parties would pay a licence fee to recover development and operational costs of the Modification. Although the proposal also states that limits would be imposed upon the use of the data by non-BSC Parties, we are opposed generally to the disclosure of the proposed level of granularity of data under P315. We have not fully analysed the potential impacts of non-BSC parties accessing the data but would expect the Workgroup/Elexon to ensure that BSC Parties would not be adversely impacted. |
| Cornwall Energy | Yes | We do not agree with the proposal. However if the data is to be released we feel it would be appropriate for a licence to be available for non-BSC parties to access the data. Additionally the relationship with the P114 licence needs exploring. |
| Spark Energy | Yes | We do not agree with the proposal. However if the data is to be released we feel it would be appropriate for a licence to be available for non-BSC parties to access the data. Additionally the relationship with the P114 licence needs exploring. |
| ScottishPower | Yes | It would only be appropriate if the people/company paying the fee were given the same rights as those customers already paying the fee under P114. It seems unfair that P114 customers would pay no fee for the additional data, whereas P315 customers would appear to restricted to the agreed modification report(s). |
| GDF SUEZ Energy UK | No | More detail is required as to the level of proposed fees before GDF SUEZ would be able to provide an informed response. |

| Respondent | Response | Rationale |
|--|----------|--|
| Good Energy Limited | Yes | We believe the proposed licence approach is appropriate, reflecting the arrangements introduced under P114, and support the principle established then that non BSC parties pay an annual fee to access data which is equivalent to a year's BSC Party Base Monthly Charge, currently set at £250 per month. This ensures that non BSC parties contribute to the implementation and ongoing costs of providing the data. Any lower fee than this invites claims from parties already licenced to access P114 data that they were being overcharged previously. |
| British Gas | Yes | We believe the licence approach and fee is appropriate. |
| Power Data Associates Ltd | No | Small organisations, such as ourselves, are not going to pay £3k per annum for this lower level of granular data. If it were freely available then we may seek to obtain it if there was some value. Not clear from my review to date what extra value would be obtained from the extra granular data. |
| EDF Energy | Yes | Yes. The legal text for P315 makes no explicit reference to a data licence or fee for third parties, but BSC Section H4.9 and V3.2 refer generally to publication of data and specifically in H4.9.2(b) and V3.2.7 to the reasonable costs of copying and providing data to a third party, and in V3.2.7 to an agreement with BSCCo. These presumably originated in previous proposal P114 concerning release of certain data to non-parties. The proposed fee is no more than the minimum contribution that any BSC Party makes to the considerable costs of the shared processes of the BSC and its systems, and on that basis we think it represents a fair share of the costs of all the processes involved in providing the data. |
| National Grid Electricity Transmission plc | Neutral | N.A |
| EnAppSys Ltd | Yes | Asking non-BSC Parties to contribute to the cost of provision of data that they consume seems fair. |
| E.ON | Yes | Given the extra costs involved in ensuring the data validity, upgrading and maintenance the IT system etc, it is not appropriate for the BSC parties to bear the costs while the information is shared to the non-BSC parties. The licenced approach and the fee structure will ensure the proposal or the alternative, if implemented, can sustain financially although |

| Respondent | Response | Rationale |
|------------|----------|--|
| | | periodic reviews of the approach and the fee should be carried out to ensure it can run as expected. |

Question 6: Would you find the publication of Supplier embedded and retail market share data under P315 useful?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 4 | 7 | 2 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------------|----------|--|
| SmartestEnergy | Yes | N.A |
| Opus Energy Limited | No | In line with our response to Question 1, we do not believe that disclosure of commercially sensitive data is justified. Adequate market share information is already available from other sources and is fit for purpose. |
| Cornwall Energy | No | Publication of the information would not be useful as it would damage competition by disclosing in near real time the progress made by suppliers. Most at risk from publication would be small suppliers growing niche businesses who would be at risk of their commercial strategies being revealed and potential targeting by competitors. |
| Spark Energy | No | Publication of the information would not be useful as it would damage competition by disclosing in near real time the progress made by suppliers. Most at risk from publication would be small suppliers growing niche businesses who would be at risk of their commercial strategies being revealed and potential targeting by competitors. |
| ScottishPower | No | We preferred the original solution, which would have provided greater granularity and as such would have allowed a detailed analysis of the Supply market to be carried out. |
| GDF SUEZ Energy UK | Yes | N.A |
| Good Energy Limited | No | Moreover, we are concerned that larger market participants with access to the required resource to analyse the data would be able to use it to gain a better understanding of their competitors, to the disadvantage of smaller participants. |
| British Gas | No | We believe the information current available on our trading position and settlement is more beneficial than using the data that would be provided under |

| Respondent | Response | Rationale |
|--|----------|---|
| | | P315. |
| Power Data Associates Ltd | Neutral | <p>Not sure what this question is asking. But this proposal was about making data more transparent, which meant to me to publish on a monthly basis, by supplier, by GSP Group. The market share of all suppliers (large and small) varies considerably be GSP Group and this should be made more apparent.</p> <p>If the concern is about small suppliers being disadvantaged then this could be resolved by setting a lower level, such as if a supplier take is less than [1]% in a GSP Group, then their actual value is set to 'demin'.</p> <p>ELEXON have confirmed to me that the D0276 provides GSP Group aggregated supplier data so anyone who pays the licence fee or is a BSC Party has access to this level of granular data. Therefore the parties who are potentially going to use the data for targeted predatory action already have access to the data. It therefore makes little sense not to publish the information in a summarised form on the website.</p> |
| EDF Energy | Neutral | We may find the summary report useful for internal reporting and peer comparison, but have not identified a firm use for the more detailed data. |
| National Grid Electricity Transmission plc | Yes | As mentioned above, the publication of additional market information under P315 (in particular the D0276 and D082 data) is likely to be beneficial to the Transmission Company (alongside our existing data sources) both in relation to our demand forecasting and charge-setting activities. |
| EnAppSys Ltd | Yes | It would be interesting to see market share of different suppliers although we can see no commercial opportunity from it for our own business at the moment. Understanding the contribution of embedded generation share on a HH level would be very useful as it forms an increasingly important component of the fuel mix and this would allow us to improve wholesale price models and generation forecasting. |
| E.ON | No | As discussed in Question 1-3, we are not fully convinced the merits of the proposal and the alternative hence we can't comment on the additional data publication proposed in the Alternative. |

Question 7: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of P315 Proposed Modification?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 3 | 4 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------------------|----------|--|
| SmartestEnergy | Yes | N.A |
| Opus Energy Limited | No | No comment. |
| Cornwall Energy | Yes | As it is written the text appears to deliver that intention, however we question the modification's intention given it is based on the rationale that publishing commercially sensitive information will increase competition, particularly given the implementation and ongoing costs in will impose. |
| Spark Energy | Yes | As it is written the text appears to deliver that intention, however we question the modification's intention given it is based on the rationale that publishing commercially sensitive information will increase competition, particularly given the implementation and ongoing costs in will impose. |
| ScottishPower | Yes | N.A |
| GDF SUEZ Energy UK | No | The amendment on pg. 2 for GSP Group Consumption Information to be provided to "Any Person (on request)" needs to be further defined. Is this linked to the proposed fee for non-BSC Parties? |
| Good Energy Limited | Neutral | We do not have a view on this. |
| British Gas | Yes | N.A |
| Power Data Associates Ltd | Neutral | N.A |
| EDF Energy | No | The Legal text does not describe the data to be published. Proposed legal text for V4.2.2(g) says that Supplier Market Share Summary Data is described in paragraph 4.2.10. However, proposed V4.2.10 and |

| Respondent | Response | Rationale |
|------------|----------|---|
| | | <p>4.2.11 only describe when data is published, not what the data is.</p> <p>The legal text should indicate what the data is (including explicit reference(s) to subsidiary documents if necessary) as well as when it is to be reported. This seems particularly important given the apparent sensitivity, indicated by prior assessment, to the granularity and timing of data reporting.</p> <p>We think the legal text should be more explicit about the “Aggregate Consumption Component Classes” (ACCC) which are intended to be used, which do not all map to actual Consumption Component Classes. As a minimum, we think the term Aggregate Consumption Component Class should be defined, for example as “A classification of settlement data according to particular Consumption Component Classes, Profile Classes or BM Units for the purpose of reporting Supplier Market Share Summary Data. The prevailing classifications are described in [Annex X-2 Table X-9, the 8 classes described in the consultation report][the SVA Data Catalogue?].”</p> <p>Separately, proposed text at Table X-2 says:</p> <p>“Supplier Market Share Summary Data means Supplier consumption data summed over a Quarter and grouped by relevant Consumption Component Classes and Profile Classes, where the relevant Consumption Component Classes and Profile Classes are defined in the SVA Data Catalogue.”</p> <p>Consumption Component Classes (CCC) are explicitly defined in BSC Table X-8. Profile Class (PC) is defined in Annex X-2, although the definition does not explicitly describe the profiles; this is contained in subsidiary documents such as BSCP509 (MDD) and BSCP516 (Profile Class), and thoroughly entrenched in industry processes. No change to CCC or PC is specified, therefore the relevant CCC and PC to be defined in the SVA Data Catalogue must come from existing classes.</p> <p>The consultation describes Aggregated Consumption Component Classes (ACCCs) “As described in Annex 1. Note that the ACCCs are less granular than that were proposed in the Assessment Consultation document and they will be reported on a national level under both the Proposed and Alternative</p> |

| Respondent | Response | Rationale |
|--|----------|---|
| | | <p>Modifications.”</p> <p>Consultation Annex 1 describes 8 ACCCs, saying “[20] Note that the eight ACCCs for the Proposed Modification and Alternative Modification solutions were further grouped from the originally proposed 13 ACCCs. The Workgroup believed that this reduced granularity would mitigate the risk of revealing commercially sensitive data.”</p> <p>The ACCCs described in the consultation document are not referred to in the legal text and are inconsistent with the legal text. The data by ACCC includes data originating from half-hourly meters and includes export. HH meters in SVA do not formally fall into a Profile Class, and meters in CVA do not fall into a Consumption Component Class or a Profile Class. Export is not consumption. Therefore the description in the BSC legal text is incomplete and misleading compared with the description in the assessment consultation.</p> <p>Given the significance of ACCCs in relation to granularity that is reported, we think the term should be defined in the BSC to accurately describe what it represents and to give it force and reference to values, and furthermore that the classes used should be described in the BSC itself, for example as a new Table X-9 in Annex X-2.</p> |
| National Grid Electricity Transmission plc | Neutral | N.A |
| EnAppSys Ltd | Yes | N.A |
| E.ON | Neutral | As we are neutral on the proposal hence we would not like to comment on the legal text for the proposal. |

Question 8: Do you agree with the Workgroup that the draft legal text in Attachment B delivers the intention of P315 Alternative Modification?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 3 | 4 | 0 |

Responses

| Respondent | Response | Rationale |
|--|----------|---|
| SmartestEnergy | Yes | N.A |
| Opus Energy Limited | No | No comment. |
| Cornwall Energy | Yes | As it is written the text appears to deliver that intention. However, as above we question the modification's reasoning that providing commercially sensitive information will benefit any parties apart from the incumbents. |
| Spark Energy | Yes | As it is written the text appears to deliver that intention. However, as above we question the modification's reasoning that providing commercially sensitive information will benefit any parties apart from the incumbents. |
| ScottishPower | Yes | N.A |
| GDF SUEZ Energy UK | No | Please see above. |
| Good Energy Limited | Neutral | We do not have a view on this. |
| British Gas | Yes | N.A |
| Power Data Associates Ltd | Neutral | N.A |
| EDF Energy | No | See comments in response to Question 7, which also apply to the alternative proposal. |
| National Grid Electricity Transmission plc | Neutral | N.A |
| EnAppSys Ltd | Yes | N.A |
| E.ON | Neutral | As we are neutral on the alternative hence we would not like to comment on the legal text for the |

| Respondent | Response | Rationale |
|------------|----------|--------------|
| | | alternative. |

Question 9: Do you agree with the Workgroup's recommended Implementation Date?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 6 | 1 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------------------|----------|---|
| SmartestEnergy | Yes | N.A |
| Opus Energy Limited | No | Although the recommended dates shown could facilitate implementation by the dates specified, for the reasons as specified in our response to Question 1, we do not support any of the options for this proposal. |
| Cornwall Energy | No | We do not believe the modification should be implemented on grounds of confidentiality, and the negative impacts it will have on BSC objective (c) and (d). |
| Spark Energy | No | We do not believe the modification should be implemented on grounds of confidentiality, and the negative impacts it will have on BSC objective (c) and (d). |
| ScottishPower | Yes | N.A |
| GDF SUEZ Energy UK | No | Suppliers already have to manage tight timescales and significant system changes through other modifications, for example P300, P272 and DCP 179, CfD FiT, CM and Project Nexus. However, the proposed modified implementation date of either 30th June 2016 or 3rd November 2016 is preferable to the original date of 5th November 2015. |
| Good Energy Limited | No | We are opposed to both the Proposed and Alternative solutions being implemented. However, should an agreed solution be developed we believe it should be implemented as part of a routine BSC Systems release. |
| British Gas | Yes | N.A |
| Power Data Associates Ltd | No | I accept the granular data available through the portal will require system develop and deployment, for which the timescales may be appropriate. However, the summarised data if information |

| Respondent | Response | Rationale |
|--|----------|--|
| | | ELEXON effectively have now and could therefore commence publishing on the website shortly after formal approval of the MOD. |
| EDF Energy | Yes | The legal text is not explicit about the solution that would be adopted, but assuming it would be as described in the assessment document, then implementation on 30 June 2016 if a decision is made on or before 22 October 2015 would give more than sufficient notice for EDF Energy. Given that operational and financial impacts on our business of the solution described are negligible, the notice period required is minimal. |
| National Grid Electricity Transmission plc | Neutral | N.A |
| EnAppSys Ltd | Yes | We have a caveat that it would be useful if the D0276 data was published for historical settlement dates as well as dates from the implementation date. As suppliers have always had access to this data it would seem fair that non-suppliers have access to the full set of historical data so that comprehensive use of it can be made. |
| E.ON | Yes | Yes we think the recommended Implementation dates as below are reasonable. <ul style="list-style-type: none"> • 30 June 2016 if the Authority's decision is received on or before 22 Oct 2015; or • 3 November 2016 if the Authority's decision is received after 22 October 2015 but on or before 22 February 2016 |

Question 10: Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P315 which would better facilitate the Applicable BSC Objectives?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 7 | 5 | 1 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------------|----------|---|
| SmartestEnergy | No | In truth the workgroup was of the view that greater granularity would have better met the BSC Objectives. For instance, data at GSP level would have provided information on the market share of incumbents in their traditional areas and this would have been extremely useful for companies considering entering the market. We agree with the workgroup in this. However, the workgroup has created an alternative which meets all of the objections raised in the first assessment consultation but also provides some useful market-wide data. We would be staggered if industry objects to this version of the modification. If they do it will only go to show how bogus previous objections to the proposal were. |
| Opus Energy Limited | No | For the reasons as specified above, we do not believe that the proposed solutions under P315 better facilitate competition, but potentially hinder it. Adequate market share information is already available from other sources and is fit for purpose. |
| Cornwall Energy | Yes | The modification tries to address two needs: disclosing, in our opinion, unnecessary information on retail market presence of suppliers with understanding more about embedded generation flows to aid the system operator. As outlined above we believe retail disclosure as envisaged by either the original or alternative modification will be extremely damaging to retail competition. Aggregate regional information by settlement period of gross and net demand and embedded generation flows may help the system operator to a similar degree while eliminating many of the serious competitive defects that P315 would introduce. If this is the case a new modification proposal should be raised that addresses this need. |

| Respondent | Response | Rationale |
|--|----------|---|
| Spark Energy | Yes | The modification tries to address two needs: disclosing, in our opinion, unnecessary information on retail market presence of suppliers with understanding more about embedded generation flows to aid the system operator. As outlined above we believe retail disclosure as envisaged by either the original or alternative modification will be extremely damaging to retail competition. Aggregate regional information by settlement period of gross and net demand and embedded generation flows may help the system operator to a similar degree while eliminating many of the serious competitive defects that P315 would introduce. If this is the case a new modification proposal should be raised that addresses this need. |
| ScottishPower | No | Please see response to Q3 above, we believe that the alternative solution could be that the D0276 publication is removed and that a revised alternative proposal should only produce the quarterly ACCC volumes in MWh and quarterly averaged MPAN counts for each Supplier at GB level and provide a report based on the D0082 data flow. |
| GDF SUEZ Energy UK | No | We still remain unconvinced that there is a strong business case for change from current practice, with no evidence being provided by the Proposer to date. |
| Good Energy Limited | Yes | We are not aware of any potential solutions within the scope of P315 that better facilitate the Applicable BSC Objectives than the existing baseline arrangements. |
| British Gas | Yes | N.A |
| Power Data Associates Ltd | No | If the proposal is progressed as recommended, then I would request that the national figures (not split by Supplier) for each GSP Group of the ACCC (as defined in Annex 1) are published. This is not a large volume of data but would enable clarity of the split between NHH & HH take across metered and unmetered customers, etc. My interest is the numbers of customers and energy take in each GSP Group by the ACCC. The split by supply is only of passing interest. |
| EDF Energy | Yes | None at this time. |
| National Grid Electricity Transmission plc | Neutral | N.A |

| Respondent | Response | Rationale |
|--------------|----------|---|
| EnAppSys Ltd | Yes | Our opinion is that more detailed information on the contribution of embedded generation to the fuel mix is important as the introduction of more small scale renewable generation and small scale peaking generation changes the wholesale market. This modification is a step along that path but this issue and area of data will need to be opened up again. An SVA fuel mix to complement the fuel mix available from CVA data would improve wholesale market modelling significantly. |
| E.ON | Yes | We don't believe the proposal or any other alternatives are necessary for the reasons discussed in Question 1-3. |

Question 11: Do you have any further comments on P315?

Summary

| Yes | No |
|-----|----|
| 7 | 6 |

Responses

| Respondent | Response | Comment |
|---------------------|----------|--|
| SmartestEnergy | Yes | <p>Ofgem stated to us, on the receipt of a FOI for SmartestEnergy’s market share data last year, that they were “minded to release [the] data” (but gave us the opportunity to present objections.) We chose not to because we believe in the transparency of data being good for competition. Indeed, there can be no objections.</p> <p>We believe that Ofgem will be inundated with individual FOIs if this modification is not approved and it would be much more efficient (and good for competition) if it is.</p> |
| Opus Energy Limited | No | N.A |
| Cornwall Energy | Yes | <p>We refer Elexon to our original letter to Ofgem, which we have again attached for ease. We do not believe any of the concerns expressed in that letter have been addressed. We note that the revised modification report includes no evaluation of the existing sources of published retail market information and how they match across to the information proposed for release under P315 original and alternative proposals.</p> <p>In our opinion Ofgem remains the industry party that should decide and then publish indicators of retail energy market competition. It can do this having weighed the full costs and benefits of publication rather than the incomplete appraisal made by the working group. Ofgem already has plans to release information under its Retail Market Review programme. No further BSC modifications providing for release of information on the market should be considered until it has had a chance to evaluate the effects of the release of this information.</p> <p>We would also like to draw attention the Competition and Markets Authority’s (CMA) Transparency and disclosure: Statement of the</p> |

| Respondent | Response | Comment |
|--------------|----------|--|
| | | <p>CMA's policy and approach (which can be found here). This states that the CMA, when considering whether disclosure is appropriate, considers that the following information is included in that which will normally be considered confidential:</p> <ul style="list-style-type: none"> • 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. <p>The proposed disclosure under both the proposed and alternative modification clearly contravene these principles and no attempt has been made by proposer or workgroup to adequately justify this, with the argument instead focusing on how granular the released information should be.</p> |
| Spark Energy | Yes | <p>We do not believe any of the concerns previously expressed have been addressed. We note that the revised modification report includes no evaluation of the existing sources of published retail market information and how they match across to the information proposed for release under P315 original and alternative proposals.</p> <p>In our opinion Ofgem remains the industry party that should decide and then publish indicators of retail energy market competition. It can do this having weighed the full costs and benefits of publication rather than the incomplete appraisal made by the working group. Ofgem already has plans to release information under its Retail Market Review programme. No further BSC modifications providing for release of information on the market should be considered until it has had a chance to evaluate the effects of the release of this information.</p> <p>We would also like to draw attention the Competition and Markets Authority's (CMA) Transparency and disclosure: Statement of the CMA's policy and approach. This states that the CMA, when considering whether disclosure is appropriate, considers that the following information is included in that which will normally be considered confidential:</p> |

| Respondent | Response | Comment |
|---------------------|----------|--|
| | | <ul style="list-style-type: none"> 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. <p>The proposed disclosure under both the proposed and alternative modification clearly contravene these principles and no attempt has been made by proposer or workgroup to adequately justify this, with the argument instead focusing on how granular the released information should be.</p> |
| ScottishPower | No | N.A |
| GDF SUEZ Energy UK | Yes | <p>It causes great concern that this modification is asserted to be beneficial to increasing competition within the market place.</p> <p>There is no real evidence that has been provided, which would call into question that the existing arrangements are insufficient. This is evidenced that this modification has only been raised by a single supplier and has never been raised as an issue prior to this, or substantiated by any other market participant.</p> <p>Although there may be additional costs required by suppliers if they want access to additional market information sources, including third party information, these financials have not been made evident within the consultation, nor have these costs been compared to the additional costs that would be incurred to facilitate the necessary system changes that would be required to facilitate P315.</p> <p>These additional costs, along with the existing regulatory changes, for example P300, P272 and DCP 179, CfD FiT, CM and Project Nexus, would have a greater impact amongst smaller suppliers who have much more limited resources compared to larger market participants. Indeed, this modification has the potential to create the opposite intended affect and actually strengthen the position of the Big 6, who have far greater resources from both a financial and resource point of view.</p> |
| Good Energy Limited | Yes | We question the merit of the quarterly summary of Suppliers' market share across a set of newly |

| Respondent | Response | Comment |
|---------------------------|----------|--|
| | | defined Aggregate Consumption Component Classes using only data from the SF settlement run. The report would be significantly more accurate if R1 settlement run data was used, particularly because not all NHH export data is available for the SF run. |
| British Gas | No | N.A |
| Power Data Associates Ltd | Yes | I support the revised ACCC as described in Annex 1. The distinction between the various groupings is not well enforced which would lead to potentially misleading information if revealed. |
| EDF Energy | Yes | <p>We note that the energy volume data to be reported would be a mixture of aggregations of:</p> <ul style="list-style-type: none"> • SVA actual and estimated meter connection level data including NHH profiled data [Supplier Quarterly by particular SVA CCCs sub-divided with PC, and GSPG daily by SVA CCC]; • (with the alternative) NHH annualised data by SVA Settlement Class [GSPG daily]; • SVA corrected data (after GSP Group Correction) and distribution loss adjustments [GSPG daily by SVA CCC]; • Transmission level data (BM Units) [Supplier quarterly, although available separately half-hourly from BM Unit data] <p>Some of these data are actual distribution connection level metered data generally used for Billing/RO/FITS/DUoS purposes, other data is at BM Unit level (transmission boundary).</p> <p>Changes to meter data occur after SF as a result of ongoing meter reads and other data revisions and adjustments. Data based on SF would not exactly represent the eventual energy allocated between different suppliers or different classes within a GSP Group.</p> <p>Quarterly energy volumes reported using SF data 2 months after the last day of the quarter will be significantly out-of-date by the time of being reported.</p> <p>We also note an existing issue, particularly throughout the parts of the BSC relating to Supplier Volume Allocation, and specifically in relation to reporting of GSP Group Consumption Information under this proposal, that the term "consumption" is</p> |

| Respondent | Response | Comment |
|--|----------|--|
| | | systematically used to describe both consumption/import and delivery/export of electricity at a boundary (relative to the public distribution and/or transmission network). With increasing distributed generation, flows in the opposite direction to those experienced historically are occurring at many levels of aggregation, including GSP and GSP Group level. There is increasing opportunity for misunderstanding. We note also that export from a site is not supply to that site. |
| National Grid Electricity Transmission plc | No | N.A |
| EnAppSys Ltd | No | N.A |
| E.ON | No | N.A |