

# Impact Assessment Responses

## P315 'Publication of Gross Supplier Market Share Data'

This Impact Assessment was issued on 12 November 2014, with responses due by 3 December 2014.

**ELEXON**

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Opus Energy Limited	1/0	Supplier
SmartestEnergy Ltd	1/0	Supplier
TMA Data Management Ltd	0/1	Supplier Agent
IBM on behalf of ScottishPower	1/0	Supplier
GDF SUEZ Energy UK	1/0	Supplier
Gazprom Marketing & Trading Retail Ltd ("Gazprom Energy")	1/0	Supplier
Good Energy Limited	1/0	Supplier, ECVNA, MVRNA
British Gas	1/0	Supplier
RWE npower plc	9/0	Generator, Supplier, Non Physical Trader
E.ON	5/0	Generator, Supplier, Interconnector User, Non Physical Trader

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## Question 1: Will P315 impact your organisation?

### Summary

Yes	No	N.A
7	2	1

### Responses

Respondent	Response
Opus Energy Limited	N.A
SmartestEnergy Ltd	<p>Yes</p> <p>P315 will impact our organisation but only in so far as we will wish to use the information for own position analysis and other market analysis. We would probably only use Option A but may pay consultants for analysis of further detail if released under Option B or C.</p>
TMA Data Management Ltd	No
IBM on behalf of ScottishPower	<p>Yes</p> <p>We have only commented on the solutions which we are likely to support.</p> <p>Option A – We will have put in place a process that enables us to download the information from the Elexon website and upload such into our internal systems.</p> <p>Option C2 – We would have to configure our IT systems to accept the data flow, however once set up we would expect the final solution to be an automated process in receiving the flow directly into our IT systems, thereby eliminating the need for any manual intervention.</p>
GDF SUEZ Energy UK	<p>Yes</p> <p>In order to utilise the additional data, there would be associated impact in order to spec, build and implement a system solution to interrogate the Elexon Portal.</p> <p>Option A would be low impact, with Options B, C1 and C2 necessitating increased amounts of dedicated resource in designing and implementing new systems to interrogate and extract the data held on the data flows.</p>

Respondent	Response
Gazprom Marketing & Trading Retail Ltd ("Gazprom Energy")	<p>Yes there is a potential impact on Gazprom Energy if new dataflows are incorporated into the solution, as we will need to make system/gateway changes to accept incoming flows. We are not supportive of the dataflow options due to the potential system changes required.</p> <p>For Option A and Option B, we do not believe there would be any mandatory impact as accessing and use of the data would be optional. Nevertheless, we are of the view that an individual supplier's data should not be made widely available.</p>
Good Energy Limited	No
British Gas	<p>Yes</p> <p>There will be an impact to implement option 3 as there will have to be a change to be able to accept the new data flow. Changes in processes will be made if there is a desire to use this information provided in all 3 options.</p>
RWE npower plc	<p>Yes</p> <p>In all cases we will have to set resource aside to analyse the information that is being made available. For Options B &amp; C we will have to make changes to our systems and processes so that the data can be captured and manipulated to produce meaningful information in a user friendly format.</p>
E.ON	<p>Yes</p> <p>It will impact us directly insofar as exposing currently commercially confidential information on our gross supply market share, as the proposal intends. Also in that should such information be published we would naturally want to check it, requiring initial and ongoing work to scrape the information from the web/portal or upload the new dataflow and analyse this.</p>

## Question 2: Will your organisation incur any costs in implementing P315?

### Summary

Yes	No	N.A
6	3	1

### Responses

Respondent	Response
Opus Energy Limited	N.A
SmartestEnergy Ltd	No It is possible (but not particularly likely) that we will wish to explore the additional data in Options B and C and to do this will require creating a system to read in the data.
TMA Data Management Ltd	No
IBM on behalf of ScottishPower	Yes While we anticipate incurring some cost in implementing whatever solution is chosen, we believe it is too early to identify the associated costs. From an implementation point of view we would prefer a normal BSC Systems release as this should also coincide with a DTC release for any new data flow. However, should a standalone release be undertaken we would wish to see both BSC and MRA product being released at the same time.
GDF SUEZ Energy UK	Yes Again, any cost implication assumes that we would need to make the commercial decision to make use of the data provided.  The costs would be a one off implementation cost in providing systems to interrogate the data flows if Option B, C1 or C2 were implemented.  Actual value is impossible to estimate as there are too many unknown variables at this early stage in the consultation.
Gazprom Marketing & Trading Retail Ltd ("Gazprom Energy")	Yes As indicated in question 1, we believe costs would arise as a result of the dataflow options. As a number of parties may not wish to use the dataflows, it would be an unnecessary cost to amend systems in order to receive dataflows that will therefore not be used.  We do not believe we would incur costs as a result of Option A or Option B as access to the data would be free of charge and optional.

Respondent	Response
Good Energy Limited	No
British Gas	Yes  Costs incurred in changing system to be able to accept the new data flow from the SVAA.
RWE npower plc	Yes  For Option A we will incur little or no costs to manage this within our own internal systems. Options B & C could potentially cause moderate system and process costs. As a BSC Party in all cases we will incur a proportion of Elexon's development and operational costs to accommodate this change relative to our funding share. We also note that some BSC Parties have a negative funding share and would be interested to know if this means that they would effectively make a negative £ contribution towards this change?
E.ON	Yes  Costs would be incurred to manage and analyse the new information/dataflow, upon implementation and for its ongoing management.  In a normal BSC systems release is always preferable to minimise time and cost incurred to manage a change.

## Question 3: How long (from the point of approval) would you need to implement P315?

### Summary

No lead time	Below 6 months	6 months ~ 1 year	N.A
1	1	4	4

### Responses

Respondent	Response
Opus Energy Limited	N.A
SmartestEnergy Ltd	We do not require a lead time.
TMA Data Management Ltd	N.A
IBM on behalf of ScottishPower	<p>Our view on the required lead time is on the basis that our preferred solution C2 is implemented. Given that C2 will require the implementation of a new data flow and our understanding that the DTC usually require a minimum of six months lead time for the implementation of such, we believe the lead time could be as long as a year. The reason we have suggested a lead time of a year is that it will depend on when Ofgem provide approval of the modification and the timescale for the new data flow proceeding through the MRA process. The lead time is also dependant on whether the release is part of the normal process or a standalone release.</p> <p>Example:</p> <p>Ofgem Approve P315 July 2015 (3 months after Final Modification Report re proposed timescale)</p> <p>MRA Process – Earliest data flow implementation date on normal release June 2016.</p> <p>The June 2016 release date assumes that new data flow is not put into MRA process until after Ofgem approval, likeliest/earliest decision date on data flow approval, September 2015 MDB meeting, minimum 6 months lead time, earliest standalone release 1 April 2016 or next DTC normal release at end of June 2016.</p> <p>As stated in Q2, our preference is for a coordinated 'normal' BSC and MRA release and based on the example above we believe the June 2016 release is the best option assuming a July 2015 Ofgem Modification approval.</p>
GDF SUEZ Energy UK	N.A

Respondent	Response
Gazprom Marketing & Trading Retail Ltd ("Gazprom Energy")	We do not believe that a lead time would be required for Option A or Option B. Option C1 and C2 would require a 6 month lead time in order to make the necessary DTC changes.
Good Energy Limited	N.A
British Gas	6 – 12 months
RWE npower plc	The user friendly Option A would require 1 – 2 months to set up internal processes to analyse the data.  Options B & C would take 6 – 9 months.
E.ON	Dealing with a new dataflow is relatively straightforward but nevertheless requires some work and testing, consequently we would suggest 2-3 months to be on the safe side. Implementation of multiple options might well be possible within this but would increase the overall lead time required.

Question 4: Which of the Workgroup’s proposed solution options do you prefer? (Note that the options are not mutually exclusive, i.e. you can choose any single option, any combination of two options or all the options that you consider to be appropriate) Please explain the reasons for your preferences.

## Summary

Option A	Option B	Option C1	Option C2	N.A/None	Other
6	0	1	1	2	4 <ul style="list-style-type: none"> <li>• 'A' variant (2)</li> <li>• 'B' variant (1)</li> <li>• 'C2' variant (1)</li> </ul>

## Responses

Respondent	Response
Opus Energy Limited	N.A
SmartestEnergy Ltd	From a general competition perspective we think that Option A is essential. For more detail and to ensure most transparency for settlement validation we feel that Option C2 is required.
TMA Data Management Ltd	We strongly favour option A User Friendly as it provides access to the data to the widest possible audience in a format that is usable. Option B would be unworkable as there would be too much details and it would not be collated to any usable level, for the purpose of P315, which is stated as being “that increased transparency will give industry more equal access to basic market share information”.  Option C does not provide wide enough access to the data.
IBM on behalf of ScottishPower	We would prefer to see two solutions implemented, Option A, which by its description is deemed to be the User Friendly option. This Option would allow an open view to all market participants and therefore be completely transparent, though this will require manual intervention to obtain the data. However our main preference is for a new data flow under Sub-option C2. We believe the use of a data flow could result in a relatively straightforward automated process which could be loaded directly onto companies systems and as such would remove ‘handling’ the data under Option A. We also believe as per the detailed requirements specification that the flow should be produced on a daily basis, however we believe that the flow should be sent via the DTN rather than having to retrieve the flow from the Exelon Portal as suggested.
GDF SUEZ Energy UK	Solution A  This option would have the lowest impact and cost implication.



Respondent	Response
Gazprom Marketing & Trading Retail Ltd ("Gazprom Energy")	<p>We have mixed views on the options proposed.</p> <p>In terms of Option A, we are in favour of the simplicity and 'user friendly' nature of it. However, we believe the data should only be made available to licenced suppliers or if necessary to extend, to BSC parties only. Therefore, we do not support the data being published on the Elexon website.</p> <p>We are comfortable with the data provision proposed under Option B, but again we are only supportive of this information being available to licenced suppliers (or if required, BSC parties).</p> <p>In terms of Option C, we are not in favour of new DTC data flows being created. There is a significant amount of industry change underway requiring system changes. We do not think the data flow options proposed are of sufficient importance to be progressed at this stage.</p>
Good Energy Limited	<p>Option A</p> <p>Our current preference for Option A is on the basis that:</p> <ul style="list-style-type: none"> <li>• We are assuming the Impact Assessment consultation will show it to be the solution with the lowest cost overall in respect of implementation and ongoing costs of required changes to BSC central systems;</li> <li>• We are concerned that with the other options the level of granularity of the data might allow individual generation sites to be identified thereby jeopardising commercial confidentiality and data protection.</li> </ul>
British Gas	<p>Option 1 is our preference. The supplier market share data in this option would provide a good summary of the data and is friendly for users to understand volumes of energy traded at a profile class level. Option 2 and 3 provide a very high level of data to the extent that this could become a barrier in itself in transparency due to the difficulty to analyse this information for some parties. The level of data provided here might be largely unused or could become anti – competitive if there is a need to create extra resources to analyse this data on a regular basis.</p>
RWE npower plc	<p>We prefer the user friendly Option A, though we believe the publication of such information should be made available on the Elexon Portal rather than the Elexon website.</p>

Respondent	Response
E.ON	<p data-bbox="400 143 504 174">None/C1</p> <p data-bbox="400 210 1150 358">We do not believe that this modification is justified for either settlement or competition, but to publish such data publicly per Option A on the Elexon website would be unwarranted and excessive.</p> <p data-bbox="400 394 1198 506">If data relating to all Suppliers were to be made available, Option B to publish on the Elexon portal, requiring licensing by non-BSC parties, would be more appropriate than on the website.</p> <p data-bbox="400 542 1214 846">Option C to create a new dataflow would however be consistent with receipt of other information instead of requiring a bespoke solution to handle it. We are not convinced that C1 would be of particular benefit for settlement, however if some parties feel that receiving this flow for their own Supplier id would be useful, then it could be justified provided the cost is not excessive. C2 providing a flow of your own data and portal access to other parties' data seems a gold-plated proposal that we believe unnecessary.</p>

Question 5: Do you believe there are any other possible alternative solutions to P315 that the Workgroup should consider?

## Summary

Yes	No	N.A
4	4	2

## Responses

Respondent	Response
Opus Energy Limited	N.A
SmartestEnergy Ltd	No
TMA Data Management Ltd	No
IBM on behalf of ScottishPower	No
GDF SUEZ Energy UK	Yes The additional new flow proposed under Option C2 could alternatively be provided via the DTN. This would remove the requirement for all impacted parties to have to build bespoke system solutions.
Gazprom Marketing & Trading Retail Ltd ("Gazprom Energy")	Yes Our preference would be for no change but should the modification go ahead, our only alternative solution would be as suggested above, a variation of Options A and B which would ensure that the data is available only to licenced suppliers.
Good Energy Limited	N.A
British Gas	Yes Proposing option 1 as the stand along change.
RWE npower plc	Yes If the Transmission Company believe they can take advantage of the new data then we propose an alternative solution where the new data is provided to them alone and not to all BSC Parties.
E.ON	No

## Question 6: Do you have any other comments on P315?

### Summary

Yes	No
5	5

### Responses

Respondent	Response
Opus Energy Limited	<p>Yes</p> <p>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.</p> <p>We do not agree that there is justification for the information to be published and would add that with the current unprecedented level of industry change, we do not believe that any potential benefits would exceed the costs associated with the development of this change.</p> <p>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 PC. We do not believe that the additional split by PC is justified - 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 that this is an argument for the data to be published as per the proposal. The proposer also mentioned FOI requests, which we would like 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 this is a loose supporting reason for the proposal.</p>
SmartestEnergy Ltd	No
TMA Data Management Ltd	No
IBM on behalf of ScottishPower	No

Respondent	Response
GDF SUEZ Energy UK	<p>Yes</p> <p>We are not convinced that the proposed MOD meets BSC objectives. As a result we would question any decision to continue the progression of this proposal given the significant amount of industry changes currently being implemented at this time.</p> <p>Given that the intended outcome is to encourage the level of market penetration of smaller suppliers within the energy sector, it remains our view that the likely impact and costs involved in building a new system solution to interrogate the additional data would have a detrimental impact on small suppliers, rather than a beneficial one.</p>
Gazprom Marketing & Trading Retail Ltd ("Gazprom Energy")	No
Good Energy Limited	No
British Gas	<p>Yes</p> <p>The level of data in options 2 and 3 is very granular and a lot of information will be provided through these methods. Will there be many parties interested in looking at this level of information? If not then option 1 will provide a good summary of the market shares in MPANs and Mwh making the market more transparent than it is at the moment. The cost to implement and continue providing option 2 and 3 could possibly outweigh the benefits received by the industry.</p>
RWE npower plc	<p>Yes</p> <p>At this stage we are not supportive of this Modification. We would be interested to learn if there is interest from other Suppliers to share such information at this level of granularity and its intent, and understand if there are any question marks over the sharing of such information under Competition Law.</p>

Respondent	Response
E.ON	<p data-bbox="400 141 448 174">Yes</p> <p data-bbox="400 208 1209 517">We are not convinced of the merit of P315 in furthering any of the BSC Objectives. We support greater visibility of embedded generation which would provide a clearer picture of the true level of electricity demand, gross of the 'negative demand' provided by embedded production. However the Proposer has not provided convincing arguments as to why this particular modification to publish Supplier data might be necessary either for reconciliation or to aid competition.</p> <p data-bbox="400 551 1209 819">Suppliers can set up internal controls to quickly identify unexpected missing or additional volumes that might have an impact on Settlement; also there are mechanisms in play across the Industry to tackle and correct missing and/or incorrectly allocated volume. As per answer to question 4 we struggle to see any benefit for settlement in P315's proposed monthly publications; if there is, seemingly only solution C1 might be justified.</p> <p data-bbox="400 853 1209 1043">From a commercial/competition perspective, allowing for everybody to be in a position to know exactly who supplies what at PC/GSP level is simply unnecessary and we do not see how providing such an excess of data would actually assist potential new entrants; it is not clear that any consumer benefit would result.</p>