

P315 'Publication of Gross Supplier Market Share Data'

P315 proposes to provide further transparency on Suppliers' Meter Volume and MPAN counts. To help all Parties understand the gross Supplier market shares, the volumes will exclude embedded generation and be broken down by various characteristics within each Grid Supply Point Group.

The aim is that increased transparency will give Suppliers more equal access to basic market share information.



ELEXON recommends P315 is progressed to the Assessment Procedure for an assessment by a Workgroup

This Modification is expected to impact:

- Suppliers
- ELEXON

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase



Any questions?

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About This Document

This document is an Initial Written Assessment (IWA), which ELEXON will present to the Panel on 9 October 2014. The Panel will consider the recommendations and agree how to progress [P315](#).

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1 Why Change?

The P315 Proposer contends that Suppliers' Metered Volume data that is currently published does not provide sufficient transparency for all BSC Parties to understand the market shares in the regional, i.e. within Grid Supply Point (GSP) Group, and national electricity supply market. The Proposer believes that, in order to help all Parties understand the gross Supplier market shares, Suppliers' Meter Volume needs to be published, and that the volumes to be published should exclude embedded generation and be broken down by Market Participant Identifier (MPID), Profile Class (PC), Active Export/Active Import and Estimated/Actual within each GSP Group.

What is currently published?

BSC Parties receive SAA-I014 (Settlement Report) which reports Suppliers' 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.

Suppliers also receive SVAA data flow D0276 (GSP Group Consumption Totals Report) which reports gross supply volumes for each Supplier, however this data does not provide volumes by PC. The drawback of this is that Parties would not be able to see the volumes consumed by different types (or PCs) of customers.

What is the issue?

The Proposer believes that neither the SAA-I014 nor D0276 provide sufficient transparency to allow all BSC Parties to understand Suppliers' gross consumption for each PC within the regional or national supply market, and believes such transparency should exist in order to enable Parties to understand the market shares for each market participant.

Currently, consultants perform surveys to establish market share and sell this information to BSC Parties. The Proposer believes that gross market share information has been the subject of Freedom of Information Requests to Ofgem which they have complied with. P315 therefore contends that the industry should have visibility of this information in basic form, without having to incur extra costs.

Proposed solution

P315 proposes to publish Half Hourly gross (not net of embedded generation) Suppliers' Metered Volume and MPAN count (supply market share) by MPID, AE/AI, Actual/Estimate and PC within each GSP Group in a user friendly format. It is also proposed that ELEXON should make the monthly or quarterly summary data available for the benefit of smaller players via the ELEXON Portal, website or other delivery mechanisms as deemed appropriate by the Workgroup.

Applicable BSC Objectives

The Proposer believes that P315 will better facilitate:

- **Applicable BSC Objective (b)** by enabling the Transmission Company and market participants to better understand the impact of the operation of embedded generation (a lot of which is intermittent renewable generation) on the market.
- **Applicable BSC Objective (c)** by providing all Suppliers with the market share information in the GSP Group, creating an equal information resource for all Suppliers, which will aid competition.

Additionally, increased data transparency is generally accepted to contribute to promoting competition.

- **Applicable BSC Objective (d)** by helping Suppliers to identify unexpected missing or additional volumes that have an additional impact on Settlement. This will result in Suppliers identifying Settlement Errors quicker and reducing the opportunity for Settlement Error.



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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3 Areas to Consider

This section highlights areas which we believe the Panel should consider in deciding how to progress this Modification Proposal, and which a Workgroup should consider as part of its assessment of P315. We recommend that the areas below form the basis of a Workgroup's Terms of Reference, supplemented with any further areas specified by the Panel.

Development of the Proposed Modification solution

How should data be published?

There are a number of available ways that ELEXON could communicate the Suppliers' gross market share data via its existing publication channels or data flows. The existing SAA-I014 and SVAA D0276 data flows already report Suppliers' Metered Volume data that is similar to the requested data. One option would be amending the existing report file structure within these data flows to include the requested data. Another option could be publishing the data on the ELEXON Portal, which is a less automated way but leads to minimal system changes. There could be more options for the Workgroup to consider, however the impacts and costs involved in each option may vary and will need to be further assessed.

What data should be published?

The P315 Proposal suggests a variety of information that could be reported, and how the information could be broken down and presented. Consideration should be given to what data would be of most benefit to Parties, and best facilitate the Objectives.

How frequently should data be published?

Consideration should be given to how frequently data should be published to most benefit relevant Parties, and best facilitate the Objectives.

Areas to consider

The table below summarises the areas we believe a Modification Workgroup should consider as part of its assessment of P315:

Areas to Consider
What would be the most appropriate channel to publish the data?
What data should be published?
With what frequency should the data be published?
What are the impacts on Parties' systems to implement P315?
What is the most appropriate Implementation Date for P315?
What changes are needed to BSC documents, systems and processes to support P315 and what are the related costs and lead times?
Are there any Alternative Modifications?
Does P315 better facilitate the Applicable BSC Objectives than the current baseline?

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4 Proposed Progression

Next steps

We recommend that P315 is progressed to an Assessment Procedure for consideration by a Workgroup.

The Proposer is not requesting that P315 is progressed as a Self-Governance Modification Proposal. We agree that it does not meet the Self-Governance Criteria (as defined in BSC Annex X-1), because it could have a material effect on competition in the supply of electricity.

Workgroup membership

We recommend that the P315 Workgroup should comprise of experts on the Supplier Volume Allocation (SVA) arrangements, Suppliers, any other relevant experts and interested parties.

Timetable

We recommend that P315 undergoes a four month Assessment Procedure, meaning the Workgroup will submit the Assessment Report to the Panel at its meeting on 12 February 2015. If P315 progresses more quickly than anticipated, we would seek to bring the Assessment Report back to the Panel at an earlier meeting.

We believe that the Workgroup will need to undertake the activities shown in the table below, which includes an extended 20 Working Day industry Assessment Consultation (taking into account the Christmas and New Year period). The timetable below allows the Workgroup to fully consider the areas highlighted in the Terms of Reference.

The BSC allows the Panel to set an Assessment Procedure timetable which is longer than three months where the Panel believes this is justified by "the particular circumstances of the Modification Proposal (taking due account of its complexity, importance and urgency)", (Section F2.2.9), and provided the Authority does not issue a contrary direction.

Proposed Progression Timetable for P315	
Event	Date
Present Initial Written Assessment to Panel	9 Oct 14
Workgroup Meeting	W/B 20 Oct 14
Workgroup Meeting (if required)	W/B 27 Oct 14
Central Systems and Industry Impact Assessment	3 Nov 14 – 21 Nov 14
Workgroup Meeting	W/B 24 Nov 14
Assessment Procedure Consultation	8 Dec 14 – 7 Jan 15
Workgroup Meeting	W/B 12 Jan 15
Present Assessment Report to Panel	12 Feb 15
Report Phase Consultation	16 Feb 15 – 6 March 15
Present Draft Modification Report to Panel	9 April 15
Issue Final Modification Report to Authority	10 April 15

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5 Likely Impacts

The potential impacts of P315 would largely depend on the solution being put forward. Using different data communication channels would have impacts on different areas of the BSCCo and BSC Party systems. The magnitude of impact also varies. We believe that this is one of the key areas that the Workgroup need to consider at its meetings and we aim to provide the details of impact as part of the P315 Assessment Procedure Report.

Impact on BSC Parties and Party Agents

BSC Parties

BSC Parties may change their internal process to be able to receive the data.

Impact on Transmission Company

We do not anticipate any impact on the Transmission Company as a result of the implementation of P315.

Impact on BSCCo

Release Management

ELEXON will be required to implement this modification.

Impact on Code

Section V (Reporting)

Changes will be required to implement this modification.

Impacts on BSC systems and processes and on Code Subsidiary Documents and other Configurable Items will depend on the P315 solution developed, and will be determined as part of the P315 Assessment Procedure.

6 Recommendations

We invite the Panel to:

- **AGREE** that P315 progresses to the Assessment Procedure;
- **AGREE** the proposed Assessment Procedure timetable;
- **AGREE** the proposed membership for the P315 Workgroup; and
- **AGREE** the Workgroup's Terms of Reference.

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Appendix 1: Glossary & References

Acronyms

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

Glossary of Defined Terms	
Acronym	Definition
AE	Active Export
AI	Active Import
BMU	Balancing Mechanism Unit
BSC	Balancing and Settlement Code
BSCCo	Balancing and Settlement Code Company
GSP	Grid Supply Point
IWA	Initial Written Assessment
MPAN	Metering Point Administration Number
MPID	Market Participant Identifier
PC	Profile Class
SVA	Supplier Volume Allocation

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
D0276	GSP Group Consumption Totals Report

External links

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

External Links		
Page(s)	Description	URL
2,3	P315 page of the BSC website	http://www.elexon.co.uk/mod-proposal/p315/

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