

Modification Proposal – BSCP40/03	MP No: P315 <i>(mandatory by BSCCo)</i>
Title of Modification Proposal <i>(mandatory by originator):</i>	
Publication of Gross Supplier Market Share Data	
Submission Date <i>(mandatory by originator):</i>	
22nd September 2014	
Description of Proposed Modification <i>(mandatory by originator)</i>	
<p>The purpose of this modification is to provide further transparency on Suppliers' Metered Volume and MPAN counts. This data would be broken down by each applicable combination of MPID, Profile Class (PC), AE/AI, Actual/Estimate and GSP Group.</p> <p>This modification should ensure the publication of total monthly or quarterly gross (not net of embedded generation) supply market share and MPAN count by MPID and AE/AI in a user friendly format. Ideally this would also be broken down in terms of PC but consideration needs to be given to the continuation of such data in a Smart world, when the intention is to be able to distinguish between domestic, small business and large business.</p> <p>More granular data could also form part of the solution. Currently, information on Metered Volume by half hour is published through the SO14 file on a net basis i.e. the net of import and export MPANs for all PCs and inclusive of line losses. This data is used to calculate Parties' liabilities under the BSC and has been made available to all Parties. The gross market share information has heretofore been regarded as commercially sensitive and unnecessary for the purposes of reconciliation. For the reasons given under the description of the defect, this is no longer a tenable position.</p> <p>We propose that summary data and/or data by half hour is made available by ELEXON via their Portal, website or other delivery mechanism as deemed appropriate by the modification group although for the more granular data it could just be a case of allowing all Suppliers to request other Suppliers' existing reports. However, there are advantages of providing some summary information to aid Suppliers checking of their own positions by PC and GSP Group.</p>	

Modification Proposal – BSCP40/03	MP No: P315 <i>(mandatory by BSCCo)</i>
<p>Description of Issue or Defect that Modification Proposal Seeks to Address <i>(mandatory by originator)</i></p> <p>From a D0276 it is possible to obtain a national gross supply figure and this gives market participants' market share in each GSP Group and NHH / HH / AE / AI consumption and losses. The D0276 does not give data by PC so, you can see the HH / NHH split, it is not possible to see the split by PC. The defect is a lack of transparency which can be resolved by providing more data at a Half Hourly PC level and, in order that the volumes of data in themselves do not create opaqueness for smaller players, at a monthly or quarterly level.</p> <p>We believe the time is right to make this data publicly available. Currently, consultants perform surveys to establish market share and sell this information back to BSC Parties. Whilst there may be some added value in the information provided it should be available in basic form to all participants in the interests of competition.</p> <p>We are also given to understand that gross market share information has been the subject of Freedom of Information Requests to Ofgem which they have complied with. This data could therefore not be deemed to be commercially sensitive and it is better for the data to be available to all.</p> <p>By publishing the data as proposed, the following would also be achieved.</p> <ol style="list-style-type: none"> 1. Reduced Settlement Risk, allowing Suppliers to validate their own and other numbers entering central Settlement. 2. Improve market transparency by making it easier to identify market share by segment and gain a clear understanding of each Party's supply business position. This is important because at the moment small Suppliers are at a disadvantage when trying to compete against other Parties due to lack of data transparency. 3. Promote easier implementation of information requirements for CfD / FiTs and EMR Settlement. 4. Provide more information on embedded generation allowing more detail for accurate modelling of the market leading to reduced dispatch errors and improving the ability of the Transmission Company to balance the System. 	
<p>Impact on Code <i>(optional by originator)</i></p>	
<p>Impact on Core Industry Documents or System Operator-Transmission Owner Code <i>(optional by originator)</i></p>	
<p>Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties <i>(optional by originator)</i></p>	

Modification Proposal – BSCP40/03	MP No: P315 <i>(mandatory by BSCCo)</i>
Impact on other Configurable Items <i>(optional by originator)</i>	
<p>Justification for Proposed Modification with Reference to Applicable BSC Objectives <i>(mandatory by originator)</i></p> <p><i>Objective (b) The economic and co-ordinated operation of the National Electricity Transmission System:</i></p> <p>Currently there is a lack of information on the contribution of embedded generation to the consumption of GSP Groups. By breaking out the AE contribution to the GSP Group, The Transmission Company and all players in the market will have more information to aid their understanding of the operation of embedded generation (a lot of which is intermittent renewable generation) on the market.</p> <p><i>Objective (c) Promoting Effective Competition:</i></p> <p>Currently there is an information asymmetry between large and small players and specialists in certain areas of the supply arrangements who by the nature of their size and market share nationally and regionally have an information advantage over other players in the supply market.</p> <p>If all Suppliers know the market share in the GSP Group they will have an equal information resource, which will aid competition.</p> <p>Many other modifications have rehearsed the arguments for data transparency and we believe it is a generally accepted principle that transparency contributes to promoting effective competition.</p> <p><i>Objective (d) Promoting Efficiency in the Implementation of the Balancing and Settlement Arrangements</i></p> <p>More data on the operation of the SVA arrangements will improve the efficiency of the BSC arrangements. Currently it is very difficult for a Supplier to track the various data flows that wind their way through the SVA arrangements. By arriving at a simple number for each combination of PC, AE/AI, Actual Estimate and volume type (metered and losses) it will be easier for a Supplier 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.</p> <p>Also this modification would provide useful information on the numbers used in Settlement for some aspects of the EMR Settlement Agent which would improve efficiency of their work and allow Parties to validate the numbers produced by the new systems around the EMR arrangements.</p>	

Modification Proposal – BSCP40/03	MP No: P315 <i>(mandatory by BSCCo)</i>
Is there a likely material environmental impact? <i>(optional by originator)</i> No	
Urgency Recommended: Yes / No <i>(delete as appropriate) (optional by originator)</i> No	
Justification for Urgency Recommendation <i>(mandatory by originator if recommending progression as an Urgent Modification Proposal)</i> N/A	
Self-Governance Recommended: Yes / No <i>(delete as appropriate) (optional by originator)</i> No	
Justification for Self-Governance Recommendation <i>(mandatory by originator if recommending progression as Self-Governance Modification Proposal)</i> N/A	
Fast Track Self-Governance Recommended: Yes / No <i>(delete as appropriate) (optional by originator)</i> No	
Justification for Fast Track Self-Governance Recommendation <i>(mandatory by originator if recommending progression as Fast Track Self-Governance Modification Proposal)</i> N/A	
Should this Modification Proposal be considered exempt from any ongoing Significant Code Reviews? <i>(optional by originator in order to assist the Panel decide whether a Modification Proposal should undergo a SCR Suitability Assessment)</i> No	
Details of Proposer: <i>Name: Colin Prestwich</i> <i>Organisation: SmartestEnergy Limited</i> <i>Telephone Number: 01473 234107</i> <i>Email Address: Colin-Prestwich@smartestenergy.com</i>	

Modification Proposal – BSCP40/03	MP No: P315 <i>(mandatory by BSCCo)</i>
Details of Proposer's Representative: <i>Name: Colin Prestwich</i> <i>Organisation: SmartestEnergy Limited</i> <i>Telephone Number: 01473 234107</i> <i>Email Address: Colin-Prestwich@smartestenergy.com</i>	
Details of Representative's Alternate: <i>Name: Jo Alexander</i> <i>Organisation: SmartestEnergy Limited</i> <i>Telephone Number: 020 7448 0955</i> <i>Email Address: Jo-Alexander@smartestenergy.com</i>	
Attachments: No <i>(delete as appropriate) (mandatory by originator)</i> If Yes, Title and No. of Pages of Each Attachment:	