P315 'Publication of Gross Supplier Market Share Data'

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

P315 was issued for industry consultation on 9 February 2015 and Proposed and Alternative Modification solutions were developed taking into account the responses received. This consultation seeks market participants' views on the P315 solutions to inform the Workgroup's further assessment of P315.

This Assessment Procedure Consultation for P315 closes:

5pm on **Tuesday 12 May 2015**

The Workgroup may not be able to consider late responses.

The P315 Workgroup initially recommends **approval** of the P315 Alternative Modification

This Modification is expected to impact:

- Suppliers
- ELEXON

ELEXON

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

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About This Document

The purpose of this P315 Assessment Procedure Consultation is to invite Balancing Settlement Code (BSC) Parties and other interested parties to provide their views on the merits of P315. The P315 Workgroup will then discuss the consultation responses, before making a final recommendation to the BSC Panel on whether or not to approve P315.

There are four parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits/drawbacks and proposed implementation approach. It also summarises the Workgroup's key views on the areas set by the Panel in its Terms of Reference, and contains details of the Workgroup's membership and the key discussions during its meetings.
- Attachment A contains the draft redlined changes to the BSC to deliver the P315 Proposed Modification.
- Attachment B contains the draft redlined changes to the BSC to deliver the P315 Alternative Modification.
- Attachment C contains the specific questions on which the Workgroup seeks your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish the Workgroup to consider.

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1 Summary

Why Change?

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

Proposed Modification Solution

The Proposer's finalised Proposed Modification solution consists of two parts:

- Publish a quarterly summary of Suppliers' market share by volume and average MPAN count at a national level across a set of newly defined Aggregate Consumption Component Classes (ACCCs[1]) on the ELEXON website. This would be published two months after the end of each quarter.
- Publish the daily D0276[2] data flow for all Settlement Run Types on the ELEXON Portal and make this available to non-BSC Parties under a licensing agreement.

Alternative Modification Solution

The Workgroup developed an Alternative Modification solution that is the same as the Proposed Modification with the addition that a new daily report would be published that contains D0082 data for all Settlement Run Types aggregated for all Suppliers - this would be published on the ELEXON Portal and available to non-BSC Parties under license.

The Workgroup developed an Alternative Modification solution that consists of the two areas of the Proposed Modification and one additional area, i.e. three parts:

- Publish a quarterly summary of Suppliers' market share by volume and average MPAN count across a set of newly defined ACCCs on the ELEXON website, as described under the Proposed solution.
- Publish the daily D0276 data flow for all Settlement Run Types on the ELEXON Portal and make this available to non-BSC Parties under a licensing agreement, as described under the Proposed solution.
- Publish a new daily report that contains D0082[3] data for all Settlement Run Types aggregated for all Suppliers on the ELEXON Portal and make this available to non-BSC Parties under a licensing agreement.

[1] 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 Modifications.
[2] D0276: GSP Group Consumption Totals Report.
[3] D0082: Supplier Purchase Matrix Report.

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Impacts & Costs

There would be no direct impact on BSC Parties to implement P315. The central implementation costs for ELEXON would be approximately 98k and 117k to implement the Proposed Modification and Alternative Modification respectively.

Implementation

The Workgroup recommends an Implementation Date of 30 June 2016 if a decision is received from the Authority on or before 22 October 2015.

Recommendation

The Workgroup unanimously believes that both the Proposed and Alternative Modifications better facilitate Applicable BSC Objective (c) compared with the baseline, and unanimously believes that the Alternative Modification is better than the Proposed Modification.

The Workgroup therefore unanimously recommends that the P315 Alternative Modification should be approved.

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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2 Why Change?

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

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

P315 contends that publishing the data would be in the interests of competition, would aid the validation of Settlement data and would help National Grid balance the system[4].

What is currently published?

SAA-I014 Settlement Reports

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

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

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

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

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

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

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

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

D0276 GSP Group Consumption Totals Report

Suppliers also receive Data Transfer Catalogue (DTC) data flow D0276 which reports volumes and MPAN counts for each GSP Group Consumption Component Class (CCC). However this data flow does not provide visibility of volumes broken down by PCs. This limitation means that Parties are not be able to see the volumes consumed by different types (or PCs) of customers. The D0276 is also restricted to BSC Parties that participate in the SVA arrangements only.

[4] The Modification solution would provide gross Supplier Volume with Supplier BMU embedded generation separated out. The Proposer believes that this would help National Grid to improve the accuracy of its demand forecast.

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What is the issue?

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

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

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3 Proposed Modification Solution

Proposed solution

The P315 Proposed Modification solution is comprised of two parts:

- Produce quarterly[5] ACCC volumes in MWh and quarterly averaged MPAN counts for each Supplier[6] at a GB level using data from the Settlement Final (SF) Run.

  This data will be published on the ELEXON website on a quarterly basis to provide easy access to the BSC Parties, non-BSC Parties including potential new market entrants. The data will be publicly available and downloadable as a csv file.

  The data will be published two months after the last Calendar Day of the reporting quarter. This would allow sufficient time for ELEXON to process the data after the relevant SF Runs take place[7].

  A legal disclaimer will be included on the ELEXON website to protect ELEXON from any commercial liabilities that may arise from the use of P315 data.

- Publish the daily D0276 for all Run Types on the ELEXON Portal.

  This data will be accessible to all BSC Parties and to any non-BSC Parties upon signing a licence agreement and paying a fee, as described below.

Legal disclaimer and P315 data licence

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

P315 disclaimer for data on the ELEXON website

ELEXON would put a disclaimer on the P315 data page of the website, which limits its liability for any commercial uses of such market share data and also states that the data posted on the website could not be used or reproduced except with the prior written consent of ELEXON. The same approach is also in use for the BMRA data that is available on the BM Report website.

P315 licence for data on the ELEXON Portal

Non-BSC Parties that wish to access data on the ELEXON Portal under P315 may do so under licence and must pay a fee of £3,000 per annum. BSC Parties will be able to access the P315 Portal data with no cost.

The P315 data licence agreement would allow non-BSC Parties to access the data while imposing limits on the use of the data and indemnifying ELEXON. This reflects the approach under the previous reporting Modification P114 'Entitlement of Licence

[5] For avoidance of doubt, reporting quarters refer to calendar quarters.
[6] To allow users better understand the retail market shares, Supplier IDs will be grouped together by Supplier Party names, as some large Suppliers may own multiple Supplier IDs.
[7] If the proposed Implementation Date of 5 November 2015 is approved, the first publication will take place in the end of February 2015 with a reporting period of Q4 2014. Since P315 does not publish data retrospectively, the Q4 2014 data will be pro-rated up for that quarter.

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Exemptible Generators (LEGs) and other Non-trading Parties to BSC Membership Without Evidence of Trading', which introduced a licence to allow non-BSC Party licensees to make use of the P114 data[8].

The total cost for licensing P114 and P315 data would be £3,000 per annum. The existing P114 data licensees who have already paid the £3,000 for the P114 data and would like to access the P315 data would be required to sign a new P315 licence agreement but without having to incur an additional cost to purchase the data for the licensed period.

This reflects the principle established under P114 in which parties pay an annual fee to access data which is equivalent to a year's BSC Party Base Monthly Charge defined in the BSC (Annex D-3 3.1(a)) and set at £250 per month. The rationale for this licence fee for non-BSC Parties is to recover the development and operational costs of the Modification solution and it may be adjusted to ensure it remains appropriate for this purpose.

Legal text for proposed solution

The P315 Proposed Modification solution would require changes to BSC Section V 'Reporting' to introduce reporting requirements for BSCCo and the SVAA to publish the quarterly Supplier market share summary and D0276 files on the ELEXON website and the ELEXON Portal respectively.

An update to BSC Section X Annex X-1 'General Glossary' would be required to introduce any new defined terms and their descriptions.

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

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

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

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4 Alternative Modification Solution

Alternative solution

The P315 Alternative Modification solution contains one additional element to the Proposed Modification solution, which is a new Suppliers aggregated D0082 report. The P315 Alternative Modification solution is therefore comprised of three parts:

- Produce quarterly ACCC volumes in MWh and quarterly averaged MPAN counts for each Supplier at a GB level using data from the SF Run.

  This data will be published on the ELEXON website on a quarterly basis to provide easy access to the BSC Parties, non-BSC Parties including potential new market entrants. The data will be publicly available and downloadable as a CSV file.

  The data will be published two months after the last Calendar Day of the reporting quarter. This would allow sufficient time for ELEXON to process the data after the relevant SF Runs take place.

  A legal disclaimer will be included on the ELEXON website to protect ELEXON from any commercial liabilities that may arise from the use of P315 data.

- Publish the daily D0276 for all Run Types on the ELEXON Portal.

  This data will be accessible to all BSC Parties and to any non-BSC Parties upon signing a licence agreement and paying a fee (as described in Section 3).

- Publish a new report for all Settlement Run Types that contains D0082 data aggregated for all Suppliers on the ELEXON Portal on a daily basis.

  This report will be accessible to all BSC Parties and to those non-BSC Parties upon signing a licence agreement and paying a fee (as described in Section 3).

Legal disclaimer and P315 data licence

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

Legal text for alternative solution

The P315 Alternative Modification solution would require changes to BSC Section V 'Reporting' to introduce reporting requirements for BSCCo and the SVAA to publish the quarterly Supplier market share summary, D0276 files and Suppliers aggregated D0082 report on the ELEXON website and the ELEXON Portal respectively.

An update to BSC Section X Annex X-1'General Glossary' would be required to introduce any new defined terms and their descriptions.

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

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

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5 Impacts & Costs

Estimated central implementation costs of P315

The estimated central implementation costs for the Proposed Modification and Alternative Modification are 98k and 117k respectively.

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

Indicative P315 industry costs

We do not expect any costs to BSC Parties in order to implement P315. There could be additional costs to Parties if they decide to further analyse or process the data.

P315 impacts

Impact on BSC Parties and Party Agents	
Party/Party Agent	Impact
BSC Trading Parties	We do not expect any direct impacts on BSC Parties to implement either the Proposed Modification or the Alternative Modification. The production and publication of the P315 data will be conducted by ELEXON. There may be indirect impacts if BSC Parties wish to further analyse or process the data provided.

Impact on Transmission Company
We do not anticipate any mandatory impact on the Transmission Company as part of the implementation of P315. However, the Transmission Company may wish to take advantage of the P315 data to gain full visibility on embedded generation in distribution networks. This could potentially help the Transmission Company to improve its demand forecasting.

Impact on BSCCo	
Area of ELEXON	Impact
BSC Operations	Data processing would be required to derive the Supplier quarterly market share summary: • Obtain Supplier CVA import volumes from SAA-I0143 for the relevant reporting quarter using the SF data. • Add CVA import volume to the ACCC volumes for each Supplier to derive the Supplier market share summary. • Further group Supplier IDs into Supplier Party name as necessary. BSC Operations would need to set up the website publication process.

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Impact on BSC Systems and process	
BSC System/Process	Impact
SVAA	Under both the Proposed Modification and the Alternative Modification: • The SVAA will be required to provide quarterly Supplier market share data (ACCCs) volumes in MWh and averaged MPAN counts for all Supplier IDs to ELEXON. • The report should be sent to ELEXON as soon as practically possible after the relevant SF Run has taken place. • The SVAA shall produce a daily D0276 file with no recipient Supplier ID section of the file header, for all Run Types and publish these files on the ELEXON Portal. Under the Alternative Modification: • In addition to the above, the SVAA shall create a new report for all Settlement Run Types that contains D0082 data aggregated for all Suppliers. Therefore Supplier IDs will not be shown in these files. • The SVAA will be required to publish this this new report on the ELEXON Portal.

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

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

Impact on other Configurable Items	
Configurable Item	Impact
Service Description for SVAA	Changes will be required to reflect the changes to processes. ELEXON will produce the redlined changes to these documents

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Impact on other Configurable Items	
Configurable Item	Impact
SVAA URS	as part of the P315 implementation, if it is approved.

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6 Implementation

Recommended Implementation Date

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

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

Assessment Consultation Question
Do you agree with the Workgroup's recommended Implementation Date? *Please provide your rationale.*
The Workgroup invites you to give your views using the response form in Attachment C

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7 Workgroup's Discussions

The aim of assessment under the BSC Modification process is to consider whether the Modification would better facilitate the Applicable BSC Objectives compared with the baseline. The Panel specified that the Workgroup should seek to establish to what extent there is a demand for the P315 data across the industry.

Following its initial consideration of P315 and development of multiple solution options, as part of the P315 Assessment Procedure consultation the Workgroup sought participants' views on whether the proposed publication of data would be appropriate and beneficial. Respondents raised a number of concerns, including around the commercial sensitivity of the data it was proposed to publish, and questioned whether the market share data currently available is insufficient, what the justification is for P315 and what the benefit of the P315 data is to Parties.

Impact of commercial sensitivity on P315 data

As part of the Assessment Consultation, the Workgroup sought industry participants' views on any potential commercially sensitive data that the potential solutions could reveal. The responses suggested three key areas of concern, those are:

- GSP Group level of granularity;
- PC level of granularity; and
- Frequency of publication.

The Ofgem member of the Workgroup advised that currently Ofgem publishes Supplier market share data once a year and they would consider that publication frequencies proposed in the potential solutions (i.e. both monthly and daily under different potential solutions) are unlikely to be justified.

Taking into account consultation responses and Ofgem's comments, the Workgroup agreed to make significant changes to its potential solution 1 (website based solution) to:

- Report the ACCCs on a national level (rather than GSP Group level as previously proposed).
- Report PCs 1-2, 3-4 and 5-8 grouped together, i.e. segment by:
    - domestic (PCs 1-2 total);
    - small non-domestic (PCs 3-4 total); and
    - large non-domestic (PCs 5-8 total).
- Publish this Supplier market share summary on a quarterly basis (rather than monthly as previously proposed).
- Ensure that there was a two month lag between the end of the quarter and publication.

The Workgroup believed that this addressed the concerns around the P315 data revealing commercially sensitive information. The Workgroup considered that, compared with the solutions consulted upon, this revised solution would result in a smaller increase in transparency in the retail market and therefore less benefit being realised by the Modification. However the Workgroup agreed that the revised solution would be a good

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compromise in addressing some Parties' concerns over commercial sensitivity of the P315 data while enabling some benefit to be delivered.

An attendee[9] acknowledged that the Workgroup had sought to address concerns around commercial sensitivity, but remained concerned that smaller Parties would be less able to use the data provided than those larger participants, due to resource constraints. As a result, larger participants would be able to obtain better understanding of competitors from the data than those smaller participants.

The Workgroup's following consideration of the benefits and drawbacks of P315 is based on the data that would be published under this revised solution, i.e. the Proposed Modification and Alternative Modification as set out in this report.

Is there a case for change?

Embedded generation transparency

The Supplier Volume Allocation (SVA) arrangements encourage participants to combine their demand and embedded generation into one entity (i.e. within a Supplier BM Unit) to realise embedded benefits. The Workgroup considered that this masks the true customer demand and believed that this lack of transparency in SVA embedded generation could result in inefficient pricing in forward markets. A Workgroup member believed that the current wholesale price is overstated due to this pricing inefficiency.

The System Operator has low visibility of demand and generation behaviours within distribution networks meaning that they will find it difficult to forecast demand and dispatch generation efficiently.

The Workgroup believed that BSC Parties and the System Operator could take advantage of the Supplier market share data to improve their demand forecasting. Currently participants in the SVA arrangements can access the D0276 data flow but non-physical traders or participants with a wholly CVA business cannot. Therefore they are disadvantaged in that they could not see the GSP Group level total embedded generation and demand volumes. The Modification would lead to improved pricing and commercial decision making, resulting in a clear commercial benefit to all BSC Parties. A Workgroup member believed that these benefits would also ultimately extend to consumers.

Generation and supply market asymmetry

The Workgroup believed that the limitations in SVA data as described above means that there is an asymmetry of data transparency between the generation and supply markets. The Applicable BSC Objectives apply to both generation and supply, and while the HH data in the CVA market is transparent to all market participants the Workgroup believed that SVA data is far less transparent when compared to CVA data.

Monitoring NHH to HH transition

One of the ACCCs that would be introduced under P315 comprises PCs 5 to 8 Metering Systems, which are currently required to migrate to HH Settlement by 1 April 2016. The Workgroup believed that P315 would therefore help Suppliers to monitor the transition from NHH to HH for these MPANs following the P272 and P300 implementations.

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Implementation impacts and cost

The Workgroup acknowledged that the benefits that it believes P315 would deliver are difficult to quantify, but believed that these benefits would outweigh the impacts and costs of P315 implementation. The Workgroup considers that the implementation costs are not excessive compared with the potential benefits.

There will be no direct costs or mandatory system changes required for participants to implement either the Proposed Modification solution or the Alternative Modification solution. Participants may incur additional costs if they choose to make use of the data made available by P315, but this is not a mandatory cost associated with implementation.

Existing reporting

The Workgroup noted that currently some Suppliers voluntarily provide data to third parties, who in turn produce quarterly market share reports and provide them to subscribers and a number of respondents to the Assessment Consultation questioned why this data is insufficient.

The Workgroup believed that this is not a Settlement solution because third parties' market share report would be based on inference from a proportion of Settlement data. This would also leave those Parties who do not subscribe the reports at competitive disadvantage.

Competition

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

The Workgroup therefore felt P315 would promote competition and encourage new entrants to the electricity retail market due to better visibility. Furthermore, increased competition would encourage efficient pricing in both wholesale and retail markets, which would be beneficial for customers.

Two respondents cited a document from the Competition and Markets Authority (CMA) stating its policy and approach on transparency and a journal from the European Commission on competition. ELEXON's legal advice was that the two cited documents were not relevant to the principle in P315, as one of the papers focused on investigations into market misconduct, while the other focused on horizontal co-operation agreements. The Workgroup noted this and agreed the documents are not relevant to P315. An attendee[9] disagreed with the Workgroup's view that the CMA report is not relevant to P315, noting that the legal advice specifically addressed the context in which the CMA set its guidance (i.e. a market investigation) rather than the general principles of whether market data should be made available at all.

Some respondents to the consultation had concerns that publishing excessive Supplier market share data would enable anti-competitive behaviours, i.e. larger Suppliers could identify the customer base for smaller Suppliers and take actions to 'squeeze them out of the market'. In response to these concerns, the Workgroup believed that neither the Proposed Modification nor the Alternative Modification would reveal customer base for

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Suppliers. It is the view of the Workgroup that any anti-competitive behaviour should be prevented by the regulatory framework.

Some respondents suggested that having to process the market share data would leave smaller Parties who are less resourced at a competitive disadvantage. The Workgroup noted from the consultation responses that the majority of participants preferred less sophisticated solutions and believed that the website based solution is supposed to be user friendly and therefore should be usable to all parties.

An attendee[9] noted the concerns of smaller market participants about the data that would be available under the solution options consulted upon. The Workgroup believed that it had addressed the concerns by developing the P315 solutions, that any possible abuse of data in the market would be limited by the regulatory framework and that no party should have an advantage or disadvantage because the data is available to everyone; however, the attendee remained concerned that smaller participants would be less able to make use of the data compared to larger participants, i.e. larger participants could benefit dis-proportionately because the data granularity would enable them to be much more aware of competitors.

Assessment Consultation Question
Would you find the publication of Supplier embedded and retail market share data under P315 useful? *Please provide your rationale.*
The Workgroup invites you to give your views using the response form in Attachment C

Implementation dates and approach

Neither the Proposed Modification nor Alternative Modification would require any mandatory system changes by BSC Parties. The earliest BSC System Release in which the ELEXON Portal aspects of the Proposed Modification and Alternative Modification solutions can be implemented is June 2016.

The Workgroup initially believed that if P315 is approved the website summary aspect should be implemented in the November 2015 Release, with the Portal element(s) subsequently going live in the June 2016 Release. The rationales for the phased implementation are:

- The format of the website summary is designed to be user friendly, Parties and other users should not need further resources or time to be able understand and use the market share data.
- The Workgroup believes the summary would deliver benefit and therefore believes it should be implemented as soon as reasonably possible, and does not believe that a staged implementation approach would have any detrimental impact.
- Implementing the summary data in November 2015 would help Parties to monitor the transition of PCs 5-8 Metering Systems from NHH to HH as a result of approved Modification P300 (with the same Implementation Date of 5 November 2015).

However since a second Assessment Consultation will be issued, as Panel requested, the phased implementation approach would not be achievable. This means that the full solution package under the Proposed Modification or the Alternative Modification should be

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implemented on 30 June 2016, if approved. It is worth noting that, when compared with the initially proposed phased implementation approach, the benefit of monitoring the NHH to HH transition will be reduced if either the Proposed Modification or Alternative Modification is implemented on 30 June 2016 (i.e. no summary data will be provided for the period of November 2015 to June 2016).

Consultation comments on P315 Assessment

One consultation respondent, noting that it was one of the third party providers of information to industry stakeholders and had not participated in the Workgroup directly[9] due to this commercial interest, raised a concern that some questions from industry responses to the P315 Impact Assessment were not addressed by the Workgroup in the Assessment Consultation and questioned whether the Workgroup had taken a balanced view in assessing P315. The respondent also questioned whether Workgroup members who are independent consultants and provide data services could act independently in the assessment of P315, given that the respondent considered they had a clear commercial interest.

P315 Impact Assessment and Assessment Procedure Consultation

The Workgroup noted that the aim of the industry Impact Assessment is to gather information from market participants on the likely mandatory impacts and costs on them to implement the Modification solutions. The P315 Impact Assessment sought industry impact and cost information on the possible solutions under consideration at that time to assist the Proposer and Workgroup in developing the Proposed and Alternative Modifications. The Workgroup also used the Impact Assessment as an opportunity to get an early view from industry participants on the potential benefits of P315 and concerns around areas like commercial sensitivity of data.

When the Workgroup considered the P315 Impact Assessment results it discussed the concerns that were raised by some market participants. The Workgroup noted the concerns but did not believe that there was enough information in the responses for it to determine what aspects of the initial options that it issued for Impact Assessment may be commercially sensitive, and therefore it was unable to determine how the concerns might be addressed.

Therefore, when the Workgroup issued the Assessment Procedure Consultation for P315 it particularly invited market participants to provide more information around their concerns. The consultation document listed all the data items that would be included in the potential Modification solutions and invited parties to indicate which of these they believed to be commercially sensitive and therefore should not be published. The Workgroup wished to fully understand participants concerns and to facilitate consideration of how it might be able to develop the P315 solution(s) to address these concerns, i.e. amend the solutions to avoid publishing commercially sensitive data while still delivering benefit.

The Workgroup welcomed the participation in its final meeting, as a non-voting attendee, of a representative of the company that raised the concerns around the issues. Note that this representative was the same referenced above[9] who had originally signed up as a Workgroup member but decided not to participate in the previous Workgroup meetings

[9] The participant initially signed up to be a Workgroup member but decided it would not be appropriate to participate in this way, and only attended the last Workgroup meeting on 9 March 2015, and then participated as an industry attendee, not a full voting member.

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due to its commercial interests in P315. The representative noted the explanation of the progression of P315 and confirmed that they believed that the Workgroup had considered and sought to address the concerns around commercial sensitivity of data set out in the responses to the P315 Assessment Procedure Consultation, though the representative still had concerns and also disagreed with the Workgroup's view with respect to the CMA, as set out above, in the relevant parts of this section.

Workgroup membership and impartiality

The Workgroup discussed the concerns raised around the impartiality of Workgroup members. All Workgroup members are required to sign a declaration letter, which requires them to act independently in accordance with BSC Section F 2.4.9.

A Workgroup member, who did not have a data provider consultancy background, strongly believed that there was no reason to doubt the impartiality of any the P315 Workgroup members and believed that the concerns in this area raised in the consultation response were unfounded and inappropriate. The rest of the Workgroup agreed with this assessment.

The Workgroup also noted that if there had been any doubt about any member's impartiality or actions ELEXON should remind such member of their obligations and act to remedy the situation. ELEXON has seen no evidence that any Workgroup member has not acted in accordance with their obligations under the BSC in the progression of P315. It should also be noted that Ofgem has participated in the Workgroup throughout the progression of P315.

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8 Further Assessment

The P315 Workgroup considered that it had completed its assessment of P315 and submitted the P315 Assessment Report in April 2015. However, the BSC Panel decided that P315 required further assessment, including industry consultation, as detailed below.

As well as the reasons for further assessment, this section sets out the views of the Workgroup relevant to the Panel's discussions and summarises some changes in this consultation from the Assessment Report submitted to the Panel.

Panel consideration of initial Assessment Report

The BSC Panel considered the P315 Assessment Report at its meeting on 9 April 2015. The Panel noted that the previous Assessment Consultation was issued to invite industry participants to comment on potential Modification solutions and raise and clarify any concerns they might have, particularly around commercial sensitivity of data which had been identified as an issue and which the Workgroup wished to better understand. The Proposer and the Workgroup had not established their Proposed and Alternative Modifications at that time, but issued several possible solutions for comment. The majority of consultation respondents did not believe the potential Modification solutions would better facilitate Applicable BSC Objectives and raised a number of concerns over the solution designs.

The Panel noted that the Workgroup, at its last meeting, considered the industry responses to the previous Assessment Consultation and developed the Proposed and Alternative Modifications. The Workgroup believed that the Proposed and Alternative Modification solutions addressed respondents' concerns and unanimously recommended that the Alternative Modification should be approved.

Although the solutions had not been finalised at the time of the previous consultation, the Workgroup did not believe that it was necessary to consult the industry again as part of the Assessment Procedure, since it felt able to give final views and that P315 would be issued for industry consultation as part of the Report Phase.

However, the Panel did not feel able to make an initial recommendation based on the Workgroup's assessment. The Panel was concerned that though the majority of respondents had not supported the solution options consulted upon, the Workgroup had not consulted the industry on the finalised solutions in reaching its unanimous view that both Proposed and Alternative Modifications would be better than the current baseline. The Panel noted that the Workgroup had sought to address respondents' concerns in developing the Proposed and Alternative Modification solutions and P315 would be issued for Report Phase industry consultation, but believed that the industry should be further consulted on the Proposed and Alternative Modifications in the Assessment Procedure in order that the Workgroup can consider the results before the Panel gives its initial view.

As well as the primary concern that the Workgroup should consider the results of further industry consultation, the Panel also directed that the Workgroup should further consider the arrangements for non-BSC Parties to access data under P315. The Panel asked that further consideration be given to the licence arrangements and particularly to the justification of the licence fee for non-BSC Parties, and whether the proposed fee, how it is levied and the link to access to other data are appropriate. The Panel questioned whether requiring non-Parties to pay such a fee is in the interests of transparency and in line with

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the contention that P315 would benefit competition and prospective new entrants to the market.

The Panel also sought clarification of the Workgroup's views on how the CMA policy document related to P315. A Panel Member questioned whether P315 could be conflating two separate contended issues, i.e. masking of embedded generation and a lack of transparency around Supplier market share, and this had led to difficulty in developing a solution to address both whereas separate solutions could be more effective.

Impact of further assessment on Implementation Date

The Workgroup initially agreed to recommend a phased implementation approach for P315, with the website summary data arrangements implemented on 5 November 2015 and other parts of the solution implemented on 30 June 2016, subject to a decision approving the Modification being received by the cut-off date.

However, the further Assessment of P315 means that phased implementation beginning in November 2015 is not achievable. Therefore the Proposed Modification or Alternative Modification would be implemented on 30 June 2016 with no phased approach, if approved by the necessary date. The implementation section reflects this updated approach.

Further Assessment Procedure Consultation

The views of the Workgroup have not changed from those set out in the initial Assessment Report. As well as changes to reflect the impact on the P315 implementation approach the Workgroup's view that the CMA policy document is not relevant to P315 has been clarified on page 16; otherwise the content of this consultation document reflects the initial Assessment Report submitted to the Panel.

Assessment Consultation Question
Do you believe the Proposed Modification and Alternative Modification address the concerns raised around commercial sensitivity of data? *Please provide your rationale and specify any concerns that have not been addressed.*
The Workgroup invites you to give your views using the response form in Attachment C

The P315 licencing approach was intended to indemnify BSCCo against the use of P315 data by non-BSC Parties. The Workgroup believed that linking the licence fee to that already levied for access to other data would be efficient, and that a fee is appropriate to defray the cost to Parties of P315 implementation. The Workgroup invites views on the licencing approach for P315, what magnitude of data licence fee (if any) is appropriate and whether such fee should be linked to licencing of other data or separate.

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Assessment Consultation Question
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? *Please provide your rationale and explain any changes you believe should be made to the P315 data licencing arrangements.*
The Workgroup invites you to give your views using the response form in Attachment C

As well as specifically asking whether the Proposed and Alternative Modification address participants' concerns and seeking views on the data licensing approach and fee, the consultation asks the usual questions (e.g. whether P315 better facilitates the Applicable BSC Objectives) in order to fully inform the Workgroup's further assessment of P315.

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Workgroup's initial conclusion

The Workgroup has unanimously concluded that:

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

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

Workgroup's views against the Applicable BSC Objectives

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

Two Workgroup members believed that both the Proposed and Alternative Modifications would be marginally beneficial to Applicable BSC Objective (b) and marginally detrimental to (d). They believed that there would be more benefits overall as they could see clear benefits against Applicable BSC Objective (c).

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

Does P315 better facilitate the Applicable BSC Objectives?		
Obj	Proposed Solution	Alternative Solution
(a)	• **Neutral** (unanimous)	• **Neutral** (unanimous)
(b)	• **Neutral** (majority and Proposer) • **Yes but marginal** (minority) The Transmission Company could indirectly benefit from having greater visibility of SVA embedded generations and therefore improve demand forecast. If BSC Parties can take advantage of the P315 data to improve their forecasting, there would be less imbalance volume for the Transmission Company to manage.	• **Neutral** (majority and Proposer) • **Yes but marginal** (minority) The benefits would be greater if more market data is released.
(c)	• **Yes** (unanimous) It would help the existing BSC Parties and new entrants to better understand Supplier market shares	• **Yes** (unanimous) The benefits would be greater if more market data is released.

What are the Applicable BSC Objectives?

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

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

(c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity

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

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

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

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Does P315 better facilitate the Applicable BSC Objectives?		
Obj	Proposed Solution	Alternative Solution
	and would promote competition.	
(d)	• **Neutral** (majority and Proposer) • **No but marginal** (minority) There will be costs associated with the implementation of the P315 Proposed Modification.	• **Neutral** (majority and Proposer) • **No but marginal** (minority) The costs will be greater to implement the Alternative Modification than the Proposed Modification.
(e)	• **Neutral** (unanimous)	• **Neutral** (unanimous)
(f)	• **Neutral** (unanimous)	• **Neutral** (unanimous)

Assessment Consultation Question

Do you agree with the Workgroup's initial unanimous view that P315 Proposed Modification **does** better facilitate the Applicable BSC Objectives than the current baseline?

Please explain your views, with reference to the Applicable BSC Objectives.

The Workgroup invites you to give your views using the response form in Attachment C

Assessment Consultation Question

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

Please explain your views, with reference to the Applicable BSC Objectives.

The Workgroup invites you to give your views using the response form in Attachment C

Assessment Consultation Question

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

Please explain your views, with reference to the Applicable BSC Objectives.

The Workgroup invites you to give your views using the response form in Attachment C

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Development of Initial Options

The Workgroup initially developed three Initial Options to establish and publish Supplier market share data. These options are set out below and they were issued for Impact Assessment.

Initial Option A – User Friendly

ELEXON would publish each month market share data in both MWh (inclusive of Distribution Losses and after application of GSP Group Correction) and MPAN counts on the ELEXON website (as distinct from the ELEXON Portal). The MWh values would use data from the SF Run for each Settlement Day in the month. The MPAN count data would be as reported in the SF Run, averaging across each reporting month. The data to be published would allow users to view the following information for each Trading Party Group in a user friendly format:

1. PC1 Metered Import
2. PC2 Metered Import
3. PC3 Metered Import
4. PC4 Metered Import
5. PC5 Metered Import
6. PC6 Metered Import
7. PC7 Metered Import
8. PC8 Metered Import
9. NHH Unmetered Import
10. HH Unmetered Import
11. HH Metered Import
12. NHH Export
13. HH Export
14. Central Volume Allocation (CVA) Contract for Difference (CfD) Import[10]
15. Total Import

The MPAN count data would include an additional column for DCC Active MPAN count and would exclude MSID count relating to CVA CfD Import.

Initial Option A would contain data at the national and GSP Group levels.

Initial Option B – Data Rich

ELEXON would provide information from the Data Transfer Catalogue (DTC) D0030[11], D0081[12] and Electricity Market Reform (EMR) D0362[13] data flows for all Suppliers on the ELEXON Portal.

BSC Parties would have access to the data with no charge. Non BSC Parties would be able to license the data at a cost of £3,000 per annum, which is the same cost as to licence the data under Modification P114 (i.e. from P315 implementation licencing both the P114 data and this P315 data would cost £3,000 in total).

[10] This refers to Suppliers' CVA import from the sites that are directly connected to the Transmission System and this data can be extracted from SAA-I0143 by ELEXON.
[11] D0030: Non Half Hourly Distribution Use of System (DUoS) Report
[12] D0081: Supplier Half Hourly Demand Report
[13] D0362: Contract for Difference (CfD) Supplier Invoice Backing Data

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Initial Option C – New Data flow

Sub-option C1

Create a new DTC data flow containing the data relating to the first HH 13 Aggregate Consumption Component Classes (as described under Initial Option A) per Supplier ID. This data flow would be sent from the SVAA to each Supplier via the DTC (i.e. containing only the data for the Supplier ID).

Sub-option C2

Produce the same content as the data flow under Sub-option C1, but with the data for all Supplier IDs. This data would be available from the ELEXON Portal. Non BSC Parties that have not yet licensed P114 data would be able to purchase P114 and P315 data together at a cost of £3,000 per annum (the cost of licensing P114 data).

Sub-option C3[14]

Develop a new DTC flow containing the same data as Sub-option C2 (HH ACCCs for all Suppliers). The data should be sent to all Suppliers via DTC and be published on the ELEXON Portal on a daily basis.

Industry impact assessment of Initial Options

We received 10 industry responses to the P315 Impact Assessment, which also sought Parties' initial views on their preferred option or a combination of options. The full responses are published on the P315 page of the ELEXON website.

Respondents did not identify any direct, mandatory impacts to implement any of the Initial Options. Respondents noted they would be impacted if they chose to receive data over the DTC, where applicable, and be indirectly impacted if they wish to further analyse or make use of the data provided under each potential solution.

Industry views

The majority of respondents preferred Initial Option A alone due to its user friendly nature and in fact that it provides the sufficient level of information of Supplier market shares for a wide range of audiences.

Two respondents believed that, on top of Initial Option A, Sub-option C2 would provide more detailed market share data and would be beneficial for Suppliers to validate their Settlement data. They also proposed an alternative option to deliver Sub-option C2 via DTC, subsequently the Workgroup developed Sub-option C3.

[14] This Sub-option was developed after the industry Impact Assessment as some respondents suggested delivering Sub-option C2 on TDC.

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Estimated central implementation costs for Initial Options and combination of options

Initial Option(s)	Implementation Costs	Maximum Lead Time
Option A	£44.3k	16 weeks
Option A +B[15]	£78.5k	25 weeks
Option A + B + C1	£112.2k	30 weeks
Option A + B + C2	£121.7k	31 weeks
Option A + C1	£78.2k	26 weeks
Option A + C2	£87.7k	27 weeks
Option A + C3	£76.6k	23 weeks

Implementation costs against on-going costs

The Workgroup believes the implementation costs and lead times for all of the Initial Option or combination of options are not prohibitive, if the options are considered to have benefit. However, the Workgroup noted that on-going costs of options must also be considered.

Consideration of on-going costs had a direct impact on the development of Sub-option C3, as it was initially intended to contain HH Settlement data for all Suppliers and GSP Groups and to be produced for all Settlement Run Types. This would potentially create a daily DTC file equivalent to 1.1 million lines and would be uneconomic to be delivered to all Suppliers via DTC as the data transfer cost, estimated on a £/megabyte basis, would be prohibitively high. The Workgroup agreed that the data contained in Sub-option C3 should be daily aggregated rather than HH aggregated and be produced for SF Settlement Run only. This would massively reduce the file size of Sub-option C3 and enable it to be transferred via DTC.

Development of Potential P315 Solutions

Developing Initial Options into new Solution Areas

The Workgroup reviewed the industry responses and costs in respect to each of its Initial Options and Sub-options and further developed them into four Solution Areas for different levels of data granularity. The key developments include:

- Since the majority of industry respondents favoured Initial Option A, the Workgroup believed that it should remain the same. This has formed **Solution Area (a)**.
- In consideration of the on-going costs, the Workgroup refined Initial Sub-option C3 data to be daily aggregated and be produced for the SF Run only. This data should be sent to Suppliers via DTC and published on the Portal on a daily basis. This formed **Solution Area (b)**.

[15] Initial Option B was impact assessed for the provision of the three DTC flows for the SF Run only.

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- Initial Sub-option C2 contains the HH market share data for all Suppliers and should be published on the ELEXON Portal only (removing the previous C1 DTC element). This formed **Solution Area (c)**.
- Although the impact assessment did not justify the demand for Initial Option B, the Workgroup believed that it could be a technical solution and provide lowest level of data granularity. The Workgroup amended the DTC data flow combinations from Initial Option B and believed that these flows should be produced for all Run Types. This formed **Solution Area (d)**.
- The impact assessment did not justify the demand for Sub-option C1. It is therefore discarded from the potential P315 solutions.

Description of Solution Areas

Solution Area (a)

- Produce the monthly aggregated ACCCs (refer to Annex 1 of this document, with PCs reported separately) for corrected volumes in MWh and the monthly average MPAN counts for each Supplier group using the Settlement Final (SF) Run data.
- This data will be published on the ELEXON website on a monthly basis to provide easy access to the BSC Parties and non BSC Parties and will be downloadable as a csv file.
- Legal control – disclaimer on the website.

Solution Area (b)

- Produce the daily aggregated ACCCs (with PCs reported separately) for corrected volumes in MWh for all Suppliers using the SF data.
- This data will be sent to all Suppliers on a daily basis via a new DTC flow and will also be available on the ELEXON Portal.
- Legal control – Licence for non BSC Parties.

Solution Area (c)

- Produce the HH ACCCs (with PCs reported separately) for corrected and uncorrected volumes in MWh for all Suppliers using the SF Settlement data.
- This data will be available on the ELEXON Portal.[16]
- Legal control – Licence for non BSC Parties.

Solution Area (d)

- Obtain either[17]:
    - D0030 and D0081 (combination of HH and Settlement Class) for all Suppliers for all Settlement Runs; or
    - D0018[18], D0081 and D0082 for all Suppliers for all Settlement Runs.

[16] It is not economic to deliver this via DTC to Suppliers due to file size and number of recipients.
[17] The two methods of obtaining different DTC flows would provide similar market share data at a low level of granularity but would require different number of files and volume of data in order to support this technical solution.
[18] D0018: Daily Profile Data Report.

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- Publish this data centrally on the ELEXON Portal.
- Legal control – Licence for non BSC Parties.

Potential P315 Solutions

Solution Areas (a), (b), (c) and (d) represent high, medium, low and lowest levels of market share data granularity with different means of delivery. The Impact Assessment results suggests that Solution Area a) was most favoured for its user friendly nature, therefore the Workgroup considered that Solution Area a) should form its own Potential P315 Solution or at least be a part of any other Potential P315 Solutions.

Potential solutions	Solution Areas covered	Description	Delivery mechanism (and availability)	Delivery frequency	Data Run Type	Indicative costs	Indicative implementation lead time
1. Monthly summary (high level granularity)	(a)	This provides the market participants with monthly market share data which is accessible via the ELEXON website.	Website (public)	Monthly	SF	Implementation cost: £44k On-going cost: minimal	16 weeks
2. Monthly and Daily summaries (high and medium levels granularity)	(a)+(b)	In addition to the information provided under Solution 1, this also provides the daily market share data via DTN and the Portal. There will be an automated data transfer mechanism for Suppliers with lower level of granularity (daily) data.	Website (public) Portal (BSC Parties and licensees) DTN (Suppliers)	Daily	SF	Implementation cost: £77k On-going approx. cost: £355/day [19]	23 weeks
3. Monthly and HH summaries (high and low levels granularity)	(a)+(c)	In addition to the information provided under Solution 1, this also provides the HH market share data, processed and at a finer level of granularity (Half Hourly), that can be downloadable from the ELEXON Portal.	Website (public) Portal (BSC Parties and licensees)	Daily	SF	Implementation cost: £88k On-going cost: minimal	27 weeks

[19] Approximate DTC data transfer cost, which is charged based on £/megabyte (MB). This cost is calculated on the basis that the daily file size would be approximately 142MB and the DTC cost is rounded to £2.5 per MB.

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4. Monthly and HH & SSC/TPR summaries (high and lowest levels granularity)	(a)+(d)	In addition to the information provided under Solution 1, this also provides the finest level of granularity market share data, unprocessed and down to Settlement Class and Half Hourly, downloadable from the ELEXON Portal.	Website (public) Portal (BSC Parties and licensees)	Daily	All	Implementation cost: £61k On-going cost: minimal	21 weeks

Development of the P315 Proposed and Alternative Modification solutions

The Workgroup, during its last meeting on 9 March 2015, reviewed the Assessment Consultation responses to its Potential P315 Solutions and finalised its Proposed and Alternative Modification solutions with some amendments.

Amendment to Potential Solution 1 (apply to both Proposed and Alternative Modifications)

- Report the ACCCs on a national level (rather than GSP Group level as previously proposed).
- Report PCs 1-2, 3-4 and 5-8 grouped together, i.e. segment by:
  - domestic (PCs 1-2 total);
  - small non-domestic (PCs 3-4 total); and
  - large non-domestics (PCs 5-8 total).
- Publish this Supplier market share summary on a quarterly basis (rather than monthly as previously proposed).

Addition of the publication of D0276 on the Portal (applies to both Proposed and Alternative Modifications)

- Publish daily D0276 data flow for all Run Types on the ELEXON Portal.

  This data will be accessible to all BSC Parties and to those non BSC Parties upon signing a licence agreement.

Addition of the publication of D0276 on the Portal (applies to the Alternative Modification only)

- Publish a new report containing an aggregated D0082 data flow for all Suppliers on the ELEXON Portal. This would effectively be a market wide GSP Group level D0082 data without any individual Supplier's data.

  This data will be accessible to all BSC Parties and to those non BSC Parties up on signing a licence agreement.

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What level of data granularity should be published?

The industry Impact Assessment brought up the concerns over the granularity of market share data that is appropriate to be published in relation to commercial sensitivity.

The Workgroup was receptive to reporting market share data to a granular level, but considered that it did not currently have a clear understanding of what level of granularity of market share data should be published in the interest of market transparency and competition, and what level of granularity particularly caused concern. The Workgroup therefore invites the views of industry participants on this question to inform its further considerations on P315.

The Assessment Procedure Consultation asked industry participants what level of granularity of market share data they believe it is appropriate to published in light of increasing market transparency. The consultation sought views on the granularity of market shares, or whether participants felt no data should be published, and invited respondents' reasons.

Will publishing P315 data promote competition?

The Workgroup believes that the market share data that would be published under the potential P315 solutions would better facilitate competition as it would provide clear market share information for the different segments of regional electricity supply markets, and this information would be equally available to Suppliers and other participants.

This information would show how market share changes over time and would help market participants and new entrants to identify new opportunities and better react to competition.

The Workgroup is generally supportive of the publication of market share information under the various potential P315 solutions. Some Workgroup members cautioned that if the data to be published under P315 is over-granular, Parties would have to invest additional resources to further analyse or process the data in order for them to understand the market shares. This would disadvantage small Parties.

The Workgroup seeks the views of participants on the impact of the potential P315 solutions on competition and the relative merit of the different levels of granularity.

Is there a precedent to publish Supplier market share data?

Ofgem currently publishes the State of Market Assessment which reports on the statistics of the national retail electricity market including Supplier market shares. However the market share data published by Ofgem is less granular than that was proposed under P315, even the least granular option, solution 1 (i.e. Ofgem reports market share on a national level and segments the market by domestic/non-domestic). The State of the Market Assessment is almost entirely devoted to reporting on the domestic market.

Third parties currently perform surveys to establish market share data. Cornwall Energy's additional response to the first Assessment Consultation (a letter to Ofgem, included in the consultation responses on the P315 webpage) sets out its view of the existing sources of information on retail markets. The letter summarises Cornwall Energy's view of the

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information it provides as well as information published, or required to be published, by Ofgem and DECC, including links for its cited examples.

What is the justification to publish market share data down to GSP Group granularity?

Publishing Supplier market share data within GSP Group would provide regional market share information. This would increase transparency in the regional electricity supply market. The Workgroup believes that restricting market share data to the national level would undermine the ability to understand Supplier activities in different regions of the country which the Workgroup believed to be an important factor of market transparency.

An example of this would be a Supplier losing market share in one particular GSP Group but gaining market share in another, causing only a small net change in total market share. This shift in regional market shares could not therefore be identified using national market share data.

What is the justification to publish market share data down to Profile Class granularity?

The Workgroup believes that publishing the market share data down to PC level would help market participants to better understand the market segmentation. The market segments used in Ofgem's State of Market Assessment are those of domestic (NHH) and non-domestic (NHH and HH)

The Workgroup invites industry participants' views on how the market share data should be segmented in the interests of transparency. The Workgroup has considered the following segmentations:

- Report PCs 1, 2, 3, 4, 5, 6, 7, 8 separately, i.e. segment by Profile Class.
- Report PCs 1, 2, 3, 4 separately and group PCs 5-8 together, i.e. segment by
    - domestic (PC1, unrestricted, and PC2, economy 7, separately);
    - small non-domestic (PC3, unrestricted, and PC4, economy 7, separately); and
    - large non-domestic (PCs 5-8 total).
- Report PCs 1-2, 3-4 and 5-8 grouped together, i.e. segment by:
    - domestic (PCs 1-2 total);
    - small non-domestic (PCs 3-4 total); and
    - large non-domestic (PCs 5-8 total).

The Workgroup currently favours reporting PCs 5-8 grouped together as they believe this reflects a balance between supplying information to a useful granularity while not presenting unnecessarily granular data. However, the Workgroup do not see a great deal of difference under this approach between reporting PCs 1-4 separately or grouping PCs 1-2 together and PCs 3-4 together. At present the Proposer shares the Workgroup's view.

The Assessment Procedure Consultation asked industry participants whether they agree with the Workgroup's initial view that PCs 5-8 should be combined but that PCs 1-4 should be reported separately, and invited respondents' reasons.

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Commercial sensitivity of data

The below table draws out a summary of data items contained within each of the potential P315 Solution Areas, including reporting frequency, and also the relevant Settlement Run(s) and delivery method. The Workgroup believes that there may be concern among some participants about commercial sensitivity of data that it is proposed to publish under P315.

To allow the Workgroup to fully understand any concerns that participants may have over the P315 data sensitivity, we invite you to clarify which items or characteristics, if any, you believe are commercially sensitive, explaining why you view these aspects as commercially sensitive.

Solution Area a) data characteristics (all solutions)	Solution Area b) data characteristics (solution 2 only)	Solution Area c) data characteristics (solution 3 only)	Solution Area d) data characteristics (solution 4 only)
Monthly ACCCs	Daily ACCCs	HH ACCCs	Daily Supplier DTC data flows D0030 and D0081 or D0018, D0081 and D0082.
Party group name	MPID	MPID	
GSP Group	GSP Group	GSP Group	
Profile Class	Profile Class	Profile Class	
Monthly aggregation	Daily aggregation	HH aggregation	
Monthly MWh volumes (SVA and CVA)	Daily MWh volumes (SVA only)	HH MWh volumes (SVA only)	
Monthly MPAN counts (SVA and CVA)	Daily MPAN counts (SVA only)	HH MPAN counts (SVA only)	
Monthly DCC MPAN counts			
SF Run data	SF Run data	SF Run data	All Runs data
Website publication	Portal publication	Portal publication	Portal publication

The Assessment Procedure Consultation asked industry participants if they believe that there any data items or other aspects of the potential P315 solutions that are commercially sensitive and therefore should not be part of the P315 Modification Solution, and invited respondents' reasons.

Should Supplier ID/Names be anonymised?

The Workgroup considered that publishing the proposed data against the relevant Supplier ID/name would be consistent with P315's objective of increased transparency. However, the Workgroup noted that if Parties are concerned that data published under P315 may be commercially sensitive they may prefer that if such information is published the associated Supplier ID/Names should be anonymised.

A Workgroup member suggested that such anonymisation would not necessarily have much effect in practice because it would still be possible for some Parties to work out the Supplier associated with particular data by cross referencing other data sources.

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Appendix 3: Workgroup Details

Workgroup's Terms of Reference

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

Assessment Procedure timetable

Proposed Progression Timetable for P315	
Event	Date
Present Initial Written Assessment to Panel	09 Oct 14
Workgroup Meeting	24 Oct 14
Central Systems and Industry Impact Assessment	12 Nov 14 – 03 Dec 14
Workgroup Meeting	09 Dec 14
Workgroup Meeting	19 Jan 15
Assessment Procedure Consultation	09 Feb 15 – 27 Feb 15
Workgroup Meeting	09 Mar 15
Present Assessment Report to Panel	09 Apr 15
Assessment Procedure Consultation	20 Apr 15 – 11 May 15
Present Assessment Report to the Panel	11 Jun 15
Report Phase Consultation	15 Jun 15 – 26 Jun 15 (subject to Panel decision)
Present Draft Modification Report to Panel	09 Jul 15
Issue Final Modification Report to Authority	10 Jul 15

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Workgroup membership and attendance

P315 Workgroup Attendance					
Name	Organisation	24 Oct 14	09 Dec 14	19 Jan 15	9 Mar 15
Members					
Dean Riddell	ELEXON *(Chair)*	✓	✓	✓	✓
Oliver Xing	ELEXON *(Lead Analyst)*	✓	✓	✓	✓
Colin Prestwich	SmartestEnergy *(Proposer)*	✓	✓	✓	✓
Phil Russell	Independent Consultant	✓	✓	✓	✓
Greg Mackenzie	British Gas	✓	☎	✓	✓
Walter Hood	IBM on behalf of ScottishPower	☎	✓	✓	✓
Tom Edwards	Cornwall Energy	✗	✗	✗	☎
Phil Hewitt	Enappsys	✓	☎	✓	✓
Esther Sutton	E.ON	✓	✓	☎	☎
Andy Colley	SSE	✗	✓	✓	✓
Attendees					
Matthew McKeon	ELEXON *(Design Authority)*	✓	✓	✓	✓
Geoff Norman	ELEXON *(Lead Lawyer)*	✗	✗	✓	✓
Monica Gandolfi	Ofgem	✓	✓	✓	✓

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Appendix 4: Glossary & References

Acronyms

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

Glossary of Defined Terms	
Acronym	Definition
ACCC	Aggregate Consumption Component Class
BMU	Balancing Mechanism Unit
BSC	Balancing and Settlement Code
CCC	Consumption Component Class
CfD	Contract for Difference
CMA	Competition and Markets Authority
CSD	Code Subsidiary Document
CVA	Central Volume Allocation
DTC	Date Transfer Catalogue
DUoS	Distribution Use of System
EMR	Electricity Market Reform
GSP	Grid Supply Point
HH	Half Hourly
IDD	Interface Definition Document
LEG	Licence Exemptible Generator
MPAN	Metering Point Administration Number
MPID	Market Participant Identifier
NHH	Non Half Hourly
PC	Profile Class
SF	Settlement Final
SVA	Supplier Volume Allocation
SVAA	Supplier Volume Allocation Agent
URS	User Requirements Specification

DTC data flows and data items

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

DTC Data Flows and Data Items	
Number	Name
D0018	Daily Profile Data Report
D0030	Non Half Hourly Distribution Use of System (DUoS) Report

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DTC Data Flows and Data Items	
Number	Name
D0081	Supplier Half Hourly Demand Report
D0082	Supplier Purchase Matrix Report
D0276	GSP Group Consumption Totals Report
D0362	Contract for Difference (CfD) Supplier Invoice Backing Data

External links

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

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

External Links		
Page(s)	Description	URL
2, 20,31	P315 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p315/
5	SAA-I0141 (Settlement Report sub flow 1) description	https://www.elexon.co.uk/wp-content/uploads/2014/07/neta_idd_part_1_v31.0.pdf
5	SAA-I0142 (Settlement Report sub flow 2) description	https://www.elexon.co.uk/wp-content/uploads/2014/11/neta_idd_part_2_v31.0.pdf
5	SAA-I0143 (Settlement Report sub flow 3) description	https://www.elexon.co.uk/wp-content/uploads/2014/11/neta_idd_part_2_v31.0.pdf
5	DTC website	http://dtc.mrasco.com/Default.aspx
5	Data flow descriptions on the DTC website	http://dtc.mrasco.com/ListDataFlows.aspx
8	P114 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p114-entitlement-of-licence-exemptable-generators-legs-and-other-non-trading-parties-to-bsc-membership-without-evidence-of-trading/

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Annex 1

Aggregate Consumption Component Classes (ACCCs)[20]

The ELEXON website based solution (quarterly Supplier market share summary) under both the Proposed and Alternative Modifications would require the below ACCCs, for both aggregated Metered Volume and averaged MPAN number, be reported for each Supplier for each calendar quarter using the SF Run data.

1. NHH Metered Import for Profile Class 1 and 2
2. NHH Metered Import for Profile Class 3 and 4
3. NHH Metered Import for Profile Class 5 to 8
4. HH Metered Import
5. NHH Unmetered Import
6. HH Unmetered Import
7. NHH Export
8. HH Export

The ACCC report would be created by the SVAA as soon as practically possible after the SF Settlement Run takes place for the entire reporting quarter and sent the report to ELEXON.

In addition, ELEXON would obtain CVA import volume for Suppliers using the SF Run SAA-I0143 data. This can be done by deriving the total negative Metered Volume value applicable to BM Units which are liable for Supplier CfD payments (summed over each reporting quarter) for each Supplier for which the value is not equal to zero (and multiply it by -1 so that it is reported as a positive value). This CVA import data should be added to the SVAA ACCC report to derive quarterly Supplier market share summary.

ELEXON would aggregate from Supplier Id to Supplier Party name as necessary.

[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.

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