

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

P329 'Changes to REMIT inside information reporting'

P329 proposes to align the BSC and Balancing Mechanism Reporting Service (BMRS) with the Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT) common schemas for inside information web feeds, required by the Agency for the Cooperation of Energy Regulators (ACER)

To achieve this, the REMIT inside information data submitted by participants and reported by the BMRS will need to cover the output requirements of ACER

This Assessment Procedure Consultation for P329 closes:

5pm on Wednesday 13 January 2016

The Workgroup may not be able to consider late responses.



The P329 Workgroup initially recommends **approval** of P329

This Modification is expected to impact:

- The Balancing Mechanism Reporting Agent (BMRA)
- The Transmission Company
- BSC Parties
- ELEXON

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About This Document

The purpose of this P329 Assessment Procedure Consultation is to invite BSC Parties and other interested parties to provide their views on the merits of P329 and to identify any impact associated with implementing P329. The P329 Workgroup will then discuss the consultation responses, before making a recommendation to the BSC Panel at its meeting on 11 February 2016 on whether or not to approve P329.

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 full Terms of Reference.
- Attachment A contains the Requirements for P329.
- Attachment B contains the draft redlined changes to the BSC for P329.
- 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.



Contact

Simon Fox-Mella

020 7380 4299

[simon.fox-](mailto:simon.fox-mella@elexon.co.uk)

mella@elexon.co.uk



P329

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Why Change?

Agency for the Co-operation of Energy Regulators (ACER) has set out its expectation for standardised web feeds within its Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT) [Manual of Procedures on data reporting v3.0](#) along with the Extensible Markup Language (XML) Schema Definitions (XSDs) for the data. As [Balancing Mechanism Reporting Service \(BMRS\)](#) is the national reporting platform, ACER will expect the BMRS to comply with the web feed and data reported to it.

Solution

P329 seeks to align the inside information on the BMRS with the REMIT common schemas for inside information web feeds, required by the ACER.

To achieve this, the REMIT inside information data submitted by participants will be required to match the output requirements of ACER in accordance with the XSDs. This data will also be published as received from market participants on BMRS (via [Market Operation Data Interface System \(MODIS\)](#) or directly via the ELEXON portal).

BSC Parties will be ultimately responsible for both accuracy and timeliness of their REMIT messages, as at present.

The Workgroup is also considering possible options of including outage profile information in some form and ceasing to use MODIS for REMIT reporting.

Impacts & Costs

P329 is expected to impact on all BSC Parties and the Transmission Company, which may need to make system changes; the Balancing Mechanism Reporting Agent (BMRA), which operates the BMRS; and ELEXON to implement the change.

Central impacts and costs will be assessed in parallel with this consultation.

Implementation

The Workgroup recommends an Implementation Date for P329 of 23 February 2017 as part of the February 2017 BSC Systems Release.

Recommendation

The Workgroup's initial majority view is that P323 **better** facilitates Applicable BSC Objectives (b), (c), (d) and (e) and therefore it initially recommends that P329 should be **approved**.

2 Why Change?

Background

REMIT

The European Union (EU) REMIT ([Regulation \(EU\) 1227/2011](#)) came into force in December 2011. It is aimed at preventing market abuse in the wholesale energy markets.

The guidance on REMIT from the ACER expressed a preference for this information to be published on central reporting platforms.

P291

SSE Energy Supply Ltd raised [P291 'REMIT Inside Information Reporting Platform for GB Electricity'](#) on 30 January 2013. P291 was approved by the Authority on 16 August 2013 and implemented on 31 December 2014. This made the BMRS the common platform for publishing inside information on the electricity market in Great Britain (GB).

REMIT Implementing Regulation

The EU REMIT Implementing Regulation ([Regulation \(EU\) 1348/2014](#)) came into force in December 2014. It specifies the reporting of fundamental data and data relevant to the REMIT. The relevance to the BSC and the BMRS is specifically Article 10 (1), which states:

“Market participants disclosing inside information on their website or service providers disclosing such information on market participants’ behalf shall provide web feeds to enable the Agency to collect these data efficiently”.

What is the issue?

ACER has set out its expectation for standardised web feeds within its REMIT Manual of Procedures on data reporting v3.0 along with the XSDs for the data. ACER states:

‘The Agency will start systematically collecting inside information through web feeds on the basis of the standards and electronic formats described in this Manual as of 7 April 2016 and would expect market participants disclosing inside information and service providers disclosing such information on market participants’ behalf to report the information through web feeds in the standards and electronic formats described in this Manual by 7 July 2016’.

As the national reporting platform BMRS, ACER will expect the BMRS to comply with the web feed and data reported to it. This Modification seeks to align the inside information on the BMRS to ACER’s XSD.

Proposed solution

This Modification proposes to align the BSC and BMRS with the inside information XSDs and allow the data to be collected via web feeds. The XSDs and standards for web feeds is defined and published by ACER in the REMIT Manual of Procedures on data reporting v3.0.

To achieve this, the REMIT inside information data submitted by participants will be required to match the output requirements of ACER in accordance with the XSDs. This data will also be published as received from market participants on BMRS (via MODIS) or directly via the ELEXON portal.

BSC Parties will be ultimately responsible for both accuracy and timeliness of their REMIT messages, as at present.

The requirements for the Proposed Modification solution are set out in Attachment A.

The Workgroup is considering the following possible options for inclusion in P329, either incorporated into the Proposed Modification or as part of an Alternative Modification solution. These options are compatible with each other:

- **Option 1: reporting on outage profiles**

This would add to ACER's requirements by providing an option for participants to submit an outage profile to BMRS. Participants will be able to choose whether or not to use the option. ACER will still receive the information it has specified in the format set out in its XSD.

- **Option 2: removal of MODIS as a route for submitting REMIT information**

To enable the standardisation of the route of submission in to BMRS, this option would make the ELEXON Portal as the sole method of submission for REMIT insider information¹.

We invite views on these options and request that any impacts and issues associated with the options are clearly identified to inform the Workgroup's further discussions.

Legal text

P329 will require changes to the following sections of the BSC Section Q 'Balancing Mechanism Activities'.

Drafting approach

The draft changes to the BSC are set out in Attachment B. The approach to drafting the legal text for P329 is to remove much of the detail of the obligations from the BSC, while making the changes necessary to deliver P329.

The obligations will instead sit in the relevant Code Subsidiary Documents (CSDs). It is intended that this will allow the requirements to be specified more clearly and enable future changes to be made in a more straightforward manner, if necessary.

¹ This does not impact EU Transparency Regulation.

Hence the draft legal text (on the submission of Inside Information Data to the BMRA via the BSC Website) is linked to Section O2.2.1(a), as this clause provides the link to the Data File Catalogue, which includes the Central Volume Allocation (CVA) Data Catalogue. The CVA Data Catalogue specifies the REMIT data flows at present, and these are captured in detail in the NETA Interface Definition and Design (IDD). Following implementation of P329 the CVA Data Catalogue and IDD would continue to specify these flows, but without the duplication currently contained in Section Q.

The changes to the CSDs will be drafted as part of implementation of P329, if approved, as is usually done for Modifications. The CSD changes will reflect the P329 solution as set out in the final Modification documentation (i.e. including the agreed requirements) and any obligations removed from the BSC (subject to amendment to deliver the P329 solution).

The process of producing the CSDs will include industry consultation, and input will be sought from the P329 Workgroup and any other interested parties. The systems and documentation that will be impacted are summarised below.

Assessment Consultation Question

Do you agree that the draft legal text in Attachment B deliver the intention of P329?

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

Other changes

In addition to the legal text changes to the BSC, there will need to be changes to:

- the BMRS system
- Balancing Mechanism Reporting Agent (BMRA) Service Description
- BMRA User Requirements Specification (URS) and
- NETA IDD Part 1.

Changes to these will be developed through the implementation of P329, should it be approved, as described above.

Solution Requirements

ACER published its REMIT Manual of Procedures on data reporting v3.0 along with the XSDs for the data on 30 September 2015. ELEXON captured requirements based on ACERs specification. The Workgroup has reviewed and agreed the Requirements to deliver P329 (Attachment A) and seeks views on these in this consultation.

Note that requirement EX-04.01.05 is an optional requirement, above ACERs specification, associated with Option 1, reporting of outage profiles. This requirement will not be included if the reporting of outage profiles is not taken forward under P329.

Assessment Consultation Question

Do you agree that the Requirements in Attachment A deliver the intention of P329?

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

Are there any alternative solutions?

The Workgroup has considered several potential alternative solutions to P329, but has not put forward an Alternative Modification at this stage. You can find the Workgroup's detailed discussions on potential options in Section 6.

Assessment Consultation Question

Do you have a potential Alternative Modification, within the scope of P329 that would better facilitate the Applicable BSC Objectives compared to the Proposed Modification?

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

4 Impacts & Costs

Estimated central implementation costs of P329

The BSC Central Systems costs for P329 will be assessed in parallel with this consultation and will be included in the Assessment Report.

P329 impacts

Impact on BSC Parties and Party Agents

Party/Party Agent	Potential Impact
BSC Parties	BSC Parties' REMIT systems that interface with BMRS will be impacted, the extent of which will be explored through an industry consultation. BSC Parties will be ultimately responsible for both accuracy and timeliness of their REMIT messages.

Impact on Transmission Company

National Grid's MODIS system that interfaces with BMRS will be impacted, the extent of which will be explored through a Transmission Company Impact Assessment.

Impact on BSCCo

Area of ELEXON	Potential Impact
Release Management	ELEXON will be required to implement this Modification.

Impact on BSC Systems and processes

BSC System/Process	Potential Impact
BMRA/BMRS	The BMRS will be updated to align with the new requirements.
Tibco Software ²	The full impacts will be identified and assessed through an impact assessment during the Assessment Procedure.

Impact on Code

Code Section	Potential Impact
Section Q	Changes will be required to implement the solution.

² The Tibco software provides the mechanism for automated publication of BMRA data to participants.

Impact on Code Subsidiary Documents	
CSD	Potential Impact
BMRA Service Description	Changes will be required to implement the solution.
BMRA URS	
NETA IDD Part 1	

Other Impacts	
Item impacted	Potential Impact
European Transparency Regulation (ETR) – National Grid (NG)-Market Interface Specification	This is likely to be impacted.

Assessment Consultation Questions
Will P329 impact your organisation?
Will your organisation incur any costs in implementing P329?
The Workgroup invites you to give your views using the response form in Attachment C - please identify any significant differences in impacts and costs associated with the solution options (outage profile reporting and removal of REMIT submissions via MODIS)

Implementation approach

On 30 September ACER confirmed the new requirements and announced a start date for the new reporting requirements of 7 July 2016. ELEXON advised ACER that we would need approximately 18 months from the requirements first being known to implement the changes needed to deliver the new reporting. This is due to the time needed to progress a Modification and make the changes to the BSC and BSC Systems.

ELEXON is in the process of rolling out Phase 3 of the new BMRS, which is planned for implementation on 15 March 2016. In addition, ELEXON is in the process of transitioning to a new service provider in the summer 2016.

Subject to assessment by the BSC Agents, ELEXON believes that it will be possible to implement the necessary changes on 23 February 2017 as part of the February 2017 BSC Systems Release. We have advised both ACER and Ofgem of this, neither has raised a concern; however, ELEXON is chasing for a response. The Workgroup discussed the implementation of P329 being later than the 7 July 2016 start date (see Section 6).

An Impact Assessment will better inform the recommendations for an implementation approach. Any recommendation on the implementation approach will need to take into consideration the available resource, risks (to the implementation of this Modification and of other changes already approved or targeted for release around the same time) and any costs that would be associated with accelerating implementation. If the impact assessment indicates that we can implement earlier (on 3 November 2016 as part of the November 2016 BSC Systems Release or at another time as a Standalone Release) without undue risk this can be taken into account by the Workgroup.

Recommended Implementation Date

The Workgroup initially recommends an Implementation Date for P329 of 23 February 2017 as part of the February 2017 BSC Systems Release.

Assessment Consultation Question

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

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

REMIT Reporting Solution Requirements

The Workgroup has agreed the solution requirements in Attachment A. Set out below are its considerations in agreeing these requirements and the areas where it seeks industry input to assist it in finalising the P329 solution.

Granularity of submissions

ACER's REMIT Manual of Procedures on data reporting v3.0 specifies that the REMIT insider information to be collected by a web feed should include an event with (e.g. an outage) and its duration. It does not constrain participants from submitting any level of granularity (e.g. concept of time series)³.

A Workgroup member observed the granularity of submissions could be one minute, but that BMRS doesn't specify the granularity and that Half Hourly submission is acceptable. ELEXON noted that there is no concept of time series or sequential blocks in ACER's requirements. A Workgroup member's view was that if the Maximum Export Limit (MEL) changed for a plant, then they would expect that the Party would want to reflect this in its outage profile.

Submission to ACER: direct from participants and via BMRS

It was noted that for participants, there are two routes to providing the information: directly to ACER or via BMRS as the national platform to ACER. The benefit of having the national platform and also publishing on one's own website is to mitigate for situations when one is not available. The intent is that what is received by BMRS is then forwarded on to ACER.

Web feed to ACER: RSS vs ATOM

ACER has specified that the web feed it receives should be either Rich Site Summary (RSS) or ATOM. Of these two ELEXON prefers the use of ATOM, because it is more standardised. ELEXON's preferred mechanism is to use REST Application Programming Interface (API) web feed. However, this was not an option included by ACER.

A Workgroup member noted that their organisation uses RSS as from their experience ATOM has been known to be impacted by Microsoft® products, such as Outlook™. It was clarified that the options were only for how ACER received the information.

BMRS will continue to provide a REST API web feed to participants. However, as ELEXON does not want to provide unnecessary web feeds, the Workgroup agreed to consult on which options are preferred by the industry. BMRS will then provide for participants REST API and either ATOM or RSS; and for ACER, whichever of ATOM or RSS is agreed to be taken forward for the industry feed.

³ Time series is a paradigm relevant to the submission of European Transparency data under Regulation 543/2013

Assessment Consultation Question

Do you agree with the use of ATOM for the web feed to ACER? (i.e. instead of RSS)

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

Web feed to participants

The Workgroup considered that there may be BMRS performance issues as a result of exposing the ACER required web feeds if this was also made available to participants, with organisations potentially polling data every minute or more. However, the Workgroup noted that BMRS will need to have controls in place to address this issue by restricting how frequently data can be retrieved.

Assessment Consultation Question

Do you believe that the ACER required web feed should also be available to participants and other interested organisations? (i.e. as well as the REST API web feed)

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

No BMRS manipulation of data received

An attendee noted that there are not many differences between the data currently reported for REMIT and that which would be reported under the new requirements, and suggested that rather than participants having to make changes it could be more efficient for the BMRS to be amended so that data that it currently receives is processed to meet ACER's requirements. However, the Workgroup noted that there are unacceptable risks associated with this approach. For instance, ACER's XSD is based on ENTSO-e's fuel type, which currently uses 20 fuel types; whereas the current REMIT XSD uses 13. Therefore, BMRS could not easily report the information or errors could occur in the reporting, which ELEXON could not be held responsible for.

ACER use of asset IDs

The Workgroup noted that BMRS uses of Balancing Mechanism (BM) Unit IDs in its reporting, as opposed to asset IDs used by ACER, but that ELEXON would address this as part of the implementation of the solution.

Any further considerations?

The Workgroup believes that the P329 solution addresses the new REMIT requirements and that it has identified the areas that require further development, e.g. BMRS use of BM Unit IDs as opposed to ACER use of asset IDs. However, it agreed that it was prudent to ask for industry views on any additional considerations that participants believe need to be addressed.

Assessment Consultation Question

Do you believe there are any additional considerations for the Workgroup?

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

Are there any alternative solutions?

The Workgroup has not yet developed an Alternative Modification solution, but has identified two possible solution options on which it seeks industry views. Depending on the views and impact assessment information received, and upon the Workgroup's further discussions, either or both of these options could be incorporated into the Proposed Modification or included in an Alternative Modification.

1. Reporting on outage profiles

The Workgroup had considered a member's view that Parties would wish to reflect changes in plants' MEL in their outage profiles in the interest of transparency.

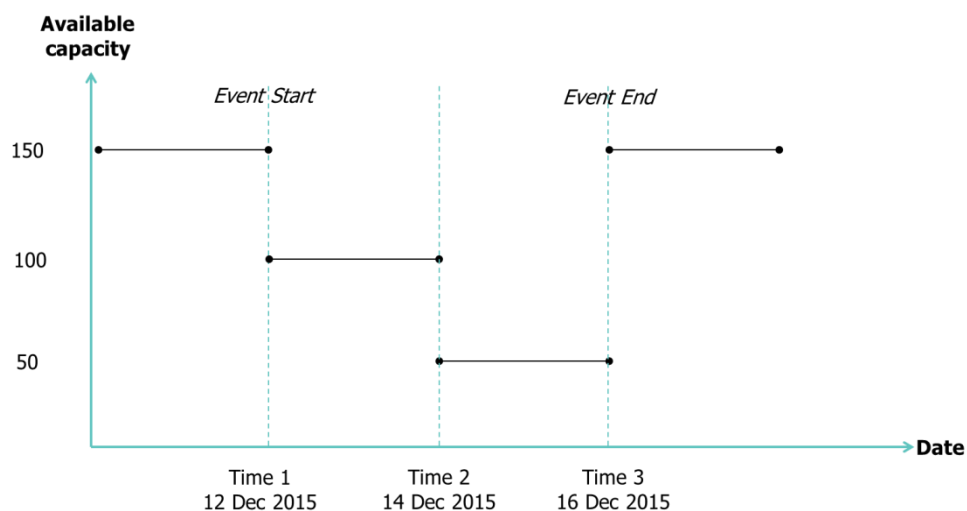
The Workgroup noted that RWE has raised [Issue 63 'Improved reporting of event history and profile availability during outage events on the BMRS REMIT pages'](#). This Issue was raised to look at the REMIT information that is submitted and published on the BMRS where a reported outage consists of multiple availability levels during the course of the event. The Issue 63 Proposer believes that the current method of reporting a single minimum availability for the entire outage period doesn't give a complete representation of changes in availability during the event.

One Workgroup member noted that P329 is aimed at addressing the explicit regulatory requirement; whereas Issue 63 seeks to explore additional efficiencies and improvements in BMRS reporting. Overall the Workgroup agreed that it would be sensible to explore this area as part of P329, while remaining mindful of the terms of reference for the Modification and its agreed progression timetable. Depending on the outcome, consideration can be given to whether Issue 63 is still necessary.

The Workgroup agreed to include an additional requirement to enable participants to articulate availability changes of a particular event in one XML submission. This requirement is an option at this stage, included to facilitate impact assessment and consultation

The Workgroup believes that to deliver this additional requirement the XSDs would be amended, providing a hierarchy to the XSDs. This would mean that the submissions in to BMRS would be published as a profile with the lower level data sitting underneath it and provided to ACER as per its requirements.

To implement this option, ACER's XSDs will need to be modified to include a lower level of detail to allow participants to articulate the profile of their outages, should they choose to use this function. For the avoidance of doubt, the information collected by ACER will be exactly as specified in the REMIT Manual of Procedures on data reporting v3.0.



The event in the graph above has multiple capacity changes and the ACER's XSD does not allow the profile to be articulated (only one value for the availability for an outage event). Therefore using a 'flat' structure could include two separate submissions/events. This is illustrated below.

Example of a submission without profile			
Event Start	Event End	Available Capacity	Installed capacity
Time 1	Time 2	100	150
Time 2	Time 3	50	150

Allowing a profile within a submission will include only one event with the event start (Time 1) and event end (Time 3). The profile will be articulated within the outage to show the change in capacity at Time 2. Using this approach only a material capacity change (under REMIT) will be articulated. This approach can help with:

- better transparency with the disclosure of inside information
- significantly reduce the number of submission for long outages.

Assessment Consultation Question

Do you support the inclusion of an option for participants to submit an outage profile for REMIT insider information purposes? Please indicate the impact that this may have on your organisation.

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

2. Removal of MODIS as route for submitting REMIT information

The Workgroup noted that ELEXON and NGET have discussed the potential to align BMRS and MODIS, which may include the use of the same Graphical User Interfaces (GUI). An NGET attendee suggested that a potential alternative solution would be for the ELEXON Portal to be the sole interface for all REMIT communications into BMRS. They suggested that this would create consistency and reduce complexity. However, they recognised that this would impact on those that do not currently use the ELEXON Portal and only use MODIS. The Workgroup noted that at present there is no manual upload function for the

ELEXON Portal, but this could be explored through this consultation. ELEXON requested that NGET forward this consultation to MODIS users.

Assessment Consultation Question

Do you support the removal of MODIS submission to BMRS for REMIT purposes? Please indicate the impact that this may have on your organisation.

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

Does implementation later than 7 July 2016 have any effect?

The Workgroup noted that it was unlikely that ELEXON would be able to implement P329 by 7 July 2015 and that the Panel had asked it to consider the consequences of this on participants. The Workgroup considered that participants are aiming to meet the 7 July 2016 start date for their individual REMIT submissions to ACER. If participants can meet the 7 July 2016 date, but the central BMRS solution cannot be implemented until a later date, there would be a period when participants are submitting slightly different information to the BMRS (directly or via MODIS) and to ACER. A Workgroup member suggested that consideration might be given to whether it would be more efficient to cease submitting information to BMRS until BMRS could meet the new REMIT requirements.

ELEXON's legal view is that the EU REMIT Implementing Regulation is legally enforceable and that, as BMRS provides an RSS web feed to ACER, BMRS is compliant with Article 10 of the regulation. ELEXON cannot state with absolute certainty whether the REMIT Manual of Procedures on data reporting v3.0 is directly legally applicable, but its view is that the requirements imposed by the Manual of Procedures should be complied with to reduce the risk of any breach, either at present or in future. Therefore the BMRS must continue to provide a REMIT web feed; while it is desirable that this web feed be fully compliant with the new REMIT requirements as soon as possible, the current (P291) REMIT web feed must be maintained until the new web feed is delivered.

Ofgem supported the approach of maintaining the current (P291) requirements on a practical level, as it would still provide useful information to the market. Ofgem would only consider supporting removal of the existing BMRS REMIT reporting if there was a benefit to the industry.

ACER's requirements have been based on the existing national platforms with the only additional fundamental requirement for BMRS is the reporting of the availability and unavailability of capacity.

A Workgroup member enquired as to whether therefore there will need to be two XML schemas from July 2016. ELEXON suggested that this will be transitioned, with new pages created. ELEXON will cease to support the previous requirements and support only the new REMIT XSD from P329. However, to standardise reporting of REMIT inside information there may be a need to archive the old pages at a later date. A Workgroup member noted the potential risks of confusion during any transition period as a result of two slightly different REMIT information feeds (MODIS and ELEXON Portal interfaces on the one hand and Market Participant web feeds on the other) from 7 July 2016 until the P329 Implementation Date, and possibly presentations of data, needing to co-exist.

The Workgroup seeks views from the industry on any possible risks or issues that may be associated with P329 not meeting the start date of 7 July 2017.

Assessment Consultation Question

Do you envision any risks or issues due to the P329 Implementation Date being later than the new REMIT Reporting Start Date?

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

Applicable BSC Objectives

The Workgroup's initial unanimous view is that P329 would better facilitate the achievement of **Applicable BSC Objectives (b), (c), (d) and (e)**. As set out below:

Applicable BSC Objective (e)

P291 could not be justified under **Applicable BSC Objective (e)**, as there was no legally binding requirement for the BSC to deliver the national platform. However, once the BSC became the means for delivering the national platform (that is, with approval of P291), any applicable regulations relating to REMIT are now relevant. As such there is a justification against **Objective (e)** so as to meet Article 10(1) of the EU REMIT Implementing Regulation.

If the BSC reporting platform for REMIT is not aligned with the requirements for central reporting to ACER then the platform is not fully delivering an inside information reporting platform for GB in manner required by ACER. This could undermine the use of the BSC platform as a central reporting platform for participants.

Applicable BSC Objectives (c), (d) and (b) in line with P291

Because this Modification would align the BSC reporting with the REMIT requirements, and therefore maintain an incentive for participants to use it as a central reporting platform, it would better facilitate **Applicable BSC Objectives (c), (d) and (b)** for the same reasons as P291:

- **Objective (c)** - increased transparency may enable market participants to make more informed decisions, and the new platform could particularly benefit participants with fewer resources, which is likely to promote increased market participation and thus increase effective competition in the generation and supply of electricity as well as in its sale and purchase.
- **Objective (d)** - wide use of the platform may mean market participants are better informed and hence balance their positions more effectively, which may lead to more efficient balancing of the system by NGET.
- **Objective (b)** - if market participants are able to make more informed decisions to increased transparency, this in turn may result in the more efficient, economic and co-ordinated operation of the national electricity transmission system.

Applicable BSC Objective (d)

In addition, it would be more efficient to change the existing platform than to establish a different reporting platform to meet the latest REMIT requirements. Therefore this Modification is the most efficient way for the Authority to enforce the REMIT, and this efficiency benefit may also represent an additional justification against **Applicable BSC Objective (d)** on the grounds that aligning the BMRS with ACER's requirements would promote efficiency in the implementation of the balancing and settlement arrangements.



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 administering 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 P329 better facilitate the Applicable BSC Objectives?		
Obj	Proposer's Views	Other Workgroup Members' Views ⁴
(a)	<ul style="list-style-type: none"> Neutral – No impact 	<ul style="list-style-type: none"> Neutral (unanimous) – as Proposer
(b)	<ul style="list-style-type: none"> Yes – Participants will be able to make more informed decisions due to increased transparency 	<ul style="list-style-type: none"> Neutral (unanimous) – as Proposer
(c)	<ul style="list-style-type: none"> Yes – increased transparency may enable participants to make informed decisions, and the new platform could particularly benefit participants with fewer resources 	<ul style="list-style-type: none"> Neutral (unanimous) – as Proposer
(d)	<ul style="list-style-type: none"> Yes – wide use of the platform may mean participants are better informed and hence balance their positions more effectively 	<ul style="list-style-type: none"> Neutral (unanimous) – as Proposer
(e)	<ul style="list-style-type: none"> Yes – the BMRS is the means for delivering the national platform (P291), therefore any applicable regulations relating to REMIT are relevant 	<ul style="list-style-type: none"> Neutral (unanimous) – as Proposer
(f)	<ul style="list-style-type: none"> Neutral – No impact 	<ul style="list-style-type: none"> Neutral (unanimous) – as Proposer

Assessment Consultation Question

Do you agree with the Workgroup's initial (unanimous) view that P329 does better facilitate the Applicable BSC Objectives than the current baseline?

Please provide your rationale.

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

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⁴ Shows the different views expressed by the other Workgroup members – not all members necessarily agree with all of these views.

Appendix 1: Workgroup Details

Workgroup's Terms of Reference

Specific areas set by the BSC Panel in the P329 Terms of Reference

What are the system requirements? This should include the non-functional requirements.

Does implementation later than 7 July 2016 have any effect (e.g. BSC Parties will need to comply with the REMIT Implementation Regulation from 7 July 2016)?

What changes are needed to BSC documents, systems and processes to support P329 and what are the related costs and lead times?

Are there any Alternative Modifications?

Does P329 better facilitate the Applicable BSC Objectives than the current baseline?

Assessment Procedure timetable

P329 Assessment Timetable

Event	Date
Panel submits P329 to Assessment Procedure	10 Dec 15
Workgroup Meeting 1	15 Dec 15
Assessment Procedure Consultation	21 Dec 15 – 13 Jan 16
Workgroup Meeting 2	W/B 18 Jan 16
Panel considers Workgroup's Assessment Report	11 Feb 16

Workgroup membership and attendance

P329 Workgroup Attendance		
Name	Organisation	15 Dec 15
Members		
Dean Riddell	ELEXON (<i>Chair</i>)	✓
Simon Fox-Mella	ELEXON (<i>Lead Analyst</i>)	✓
Francesca Scucces	P329 (<i>Proposer</i>)	☎
Stephen Conway	Calon Energy Limited	☎
Paul Coates	RWE	☎
Gary Henderson	Everis for Scottish Power	☎
Dan Webb	Seabank Power Limited	☎
Graham Bunt	EDF	☎
Andy Colley	SSE	☎
Attendees		
Zaahir Ghanty	ELEXON (<i>Design Authority</i>)	✓
Steve Wilkin	ELEXON (<i>European Coordination Manager</i>)	✓
Tina Wirth	ELEXON (<i>Lead Lawyer</i>)	✓
Austin Sharman	Ofgem	☎
Peter Frampton	Ofgem	☎
Steven Taylor	Quorum Development Ltd	☎
Price, Richard J	NGET	☎
Ajilesh Thayath	NGET	☎
Joseph Underwood	Drax	☎
Lewis Mitchell	EDF	☎
Correspondence only		
Martin Mate	EDF	n/a

Appendix 2: Glossary & References

Acronyms

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

Acronym	
Acronym	Definition
ACER	Agency for the Cooperation of Energy Regulators
BM	Balancing Mechanism
BMRA	Balancing Mechanism Reporting Agent (<i>BSC Agent</i>)
BMRS	Balancing Mechanism Reporting Service (<i>BSC System</i>)
BSC	Balancing and Settlement Code (<i>Industry Code</i>)
CSD	Code Subsidiary Document
CVA	Central Volume Allocation
ETR	European Transparency Regulation
EU	European Union
GB	Great Britain
GUI	Graphical User Interfaces
IDD	Interface Definition and Design (<i>Code Subsidiary Document</i>)
MEL	Maximum Export Limit
MODIS	Market Operation Data Interface System (<i>NG's transparency system</i>)
NG	National Grid
REMIT	Regulation on Wholesale Energy Markets Integrity and Transparency
REST API	Representational State Transfer Application Programming Interfaces
RSS	Rich Site Summary
URS	User Requirements Specification (<i>Code Subsidiary Document</i>)
XML	Extensible Markup Language
XSD	XML Schema Definitions

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
3	BMRS on the BM Reports website	http://www.bmreports.com/
3	ACER public documentations on the ACER website	https://www.acer-remit.eu/portal/public-documentation

External Links		
Page(s)	Description	URL
3	MODIS on the National Grid's webpage	http://www2.nationalgrid.com/UK/Industry-information/Europe/ETR-E-Modis/
4	EU legislation page on the ACER website	http://www.acer.europa.eu/the_eu_energy_market/legislation/Pages/default.aspx
4	P291 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p291/
13	Issue 63 page on the ELEXON website	https://www.elexon.co.uk/smg-issue/issue-63/