ANNEX 1 – PROPOSED TEXT TO MODIFY THE BSC

SECTION Q

Insert as new paragraph 6.4:

6.4 Submission of generation data to BSCCo

6.4.1 In this paragraph 6.4:

(a) Genset, Output Usable and Transmission Zone have the meanings given to those terms in the Grid Code;

(b) references to Output Usable in relation to a Genset are to the Output Usable data for the time being provided to the Transmission Company by the relevant User pursuant to the Grid Code;

(c) "**Total Output Usable**" means the sum for all Gensets of Output Usable;

(d) times by which the Transmission Company is required to send data to BSCCo are target times, which the Transmission Company is expected to meet unless abnormal circumstances prevent it from doing so.

6.4.2 The Transmission Company shall send to BSCCo the data set out in the table below with the frequency and by the times respectively set out in the table below:

DATA	FREQUENCY	TARGET TIME
2–14 day ahead daily Output Usable per Transmission Zone (OU) and Total Daily Output Useable – daily peak half hour values	Daily	16:00
2–49 day ahead Output Useable per Transmission Zone (OU) and Total Daily Output Usable – daily peak half hour values	Weekly	16:00
2–52 week ahead weekly daily Output Useable per Transmission Zone (OU) [and Total Weekly Output Useable – weekly peak half hour values	Weekly	16:00
1-2 year ahead weekly Output Useable per Transmission Zone (OU) and Total Weekly Output Useable – weekly peak half hour values	6 Monthly	16:00
3-5 year ahead weekly Output Useable per Transmission Zone (OU) and Total Weekly Output Useable – weekly peak half hour values	6 Monthly	16:00

Renumber existing paragraph 6.4 as paragraph 6.5.

SECTION V

Amend paragraph 1.1.5(a) to read:

(a) the obligations of the Transmission Company to send specified data to the BMRS and BSCCo pursuant to Section Q6;

Insert as new paragraph 4.4:

4.4 Generation data

4.4.1 BSCCo shall arrange for the data set out in Table 8 in Annex V-1 to be published on the BSC Website and revised from time to time as soon as reasonably practicable after BSCCo receives such data from the Transmission Company pursuant to Section Q6.4.

4.4.2 Where such data is received by BSCCo from the Transmission Company on a day which is not a Business Day, BSCCo shall publish such data on the BSC Website on the next following Business Day.

Insert as new Table 8 in Annex V-1:

TABLE 8 – GENERATION DATA PUBLISHED ON BSC WEBSITE

Notes:

1. In this table terms shall have the meanings given to them in Section Q6.4.
2. Column 1 (data) specifies the data to be published and the day, week or other period to which the data relates.
3. Column 3 (frequency) specifies the frequency with which data is published or revised (subject to Section V4.4.2).

DATA	FREQUENCY
2–14 day ahead daily Output Usable per Transmission Zone (OU) and Total Daily Output Useable – daily peak half hour values	Daily
2–49 day ahead Output Useable per Transmission Zone (OU) and Total Daily Output – daily peak half hour values	Weekly
2–52 week ahead weekly daily Output Useable per Transmission Zone t (OU) and Total Weekly Output Useable – weekly peak half hour values	Weekly
1-2 year ahead weekly Output Useable per Transmission Zone t (OU) and Total Weekly Output Useable – weekly peak half hour values	6 Monthly
3-5 year ahead weekly Output Useable per Transmission Zone t (OU) and Total Weekly Output Useable – weekly peak half hour values	6 Monthly

ANNEX X-2

Insert new definitions (in appropriate alphabetic place) in Table X-2:

Defined Term	Acronym	Units	Definition/explanatory text
Transmission Zone			Has the meaning given to that term in the Grid Code.
Output Usable	OU	MW	Has the meaning given to that term in the Grid Code.
Total Output Usable		MW	Has the meaning given to that term in Section Q6.4.

ANNEX 2 – BSC AGENT IMPACT ASSESSMENTS

NETA Change Form

To be completed by the Originator						
Change Request ID (to be provided by the Customer) P22 Logica reference:			Service affected BMRA			
Change Request Name: ICR141			P022 Logica Requirements Specification for Distribution of Generator Outage Information			
Agreement by the customer to proceed to the next stage						
	High Level Assessment	Detailed Level Assessment	Change Quotation	Implement Change	Emergency Fix Report	Change Request under Clause 14.2 (delay)
Tick which stage is being requested	✍					
Signed by Customer Baseline Manager						
Signed by Customer Contract Manager						
Date of agreement to proceed to next stage					n/a	n/a
Date this stage to be completed by	10/09/01					

Configuration of Service(s) (baseline affected)	
Assumed Changes (over baseline)	NETA Service Definition Baseline (V1.0)
Priority	High/Medium/Low
Identified by : Sandy Blows	Date Submitted: 29/08/01
Description of Change See attached original P22 .	
Reason for Change (benefits) See attached original P22	
Implications of not making the change See attached original P22	
Attachments/references	P22

Competition Item Yes/No/n/a	Reasons for Competition
If Change Request made under Clause 14.2 (delay)	Required supporting information attached

To be completed by the Service Provider			
	High Level Assessment	Detailed Level Assessment	Change Quotation
Tick which stage is being completed	✓		
Signed by Service Provider Contract Manager			
Date	10/09/01		

Validity period of costs/prices	Change Quotation	
	Change	30 days

Does the change involve any changes to the System or Services	Yes
Would the undertaking of a Detailed Level Assessment or Change Quotation delay the Trigger Milestone or the Planned Go-Live Date before Go Live or any Release Date after Go Live	N/a
If Yes – specify which Milestones/Release Dates would be affected	N/a
Impact on any Milestones of incorporation of change	N/a

Indicative impact on resources for change incorporation	Phase of the work			
	Design	Build	Test & Trial	Operate
Labour				
Materials/3rd Party				

Impact on Service Levels	None
Impact on IDD	Yes

Price for Detailed Level Assessment		Indicative/firm
Price for Change Quotation		Indicative/firm
Price for Change		
Option A1 – Output Usable Data: Individual Genset and National	£567,200 (ex VAT) to develop and implement change. £8,600 (ex VAT) per month to Operate and Maintain	Indicative Indicative
Option A2 – Output Usable Data: NGC Zone and National	£654,800 (ex VAT) to develop and implement change. £9,900 (ex VAT) per month to Operate and Maintain	Indicative Indicative
Option A3 – Output Usable Data: BMRA Zone and National	£629,800 (ex VAT) to develop and implement change. £9,500 (ex VAT) per month to Operate and Maintain	Indicative Indicative
Option B1 – Output Usable Data: Individual Genset and National	£744,800 (ex VAT) to develop and implement change. £11,200 (ex VAT) per month to Operate and Maintain	Indicative Indicative
Option B2 – Output Usable Data: NGC Zone and National	£835,300 (ex VAT) to develop and implement change. £12,600 (ex VAT) per month to Operate and Maintain	Indicative Indicative

Option B3 – Output Usable and Outage Data: BMRA Zone and National	£809,700 (ex VAT) to develop and implement change. £12,200 (ex VAT) per month to Operate and Maintain	Indicative Indicative

Assumptions for the above Price:

- Logica will invoice 30% on receipt of CN or authorised start of work, 50% on completion of acceptance tests, 20% on deployment or one month after completion of acceptance tests, whichever is sooner.
- This price allows for no additional changes to the SAA database.
- Price does not include provision for indexation of daily fee rates with effect from 1st April 2002.
- The Service Description will have been updated by ELEXON and agreed with Logica prior to deployment.
- Only document updates will be submitted for review by ELEXON during the development of this change and a maximum of one working days has been allowed for ELEXON to review and comment on the updates. No allowance is included for addressing comments from ELEXON and only one iteration of all reviewed documents has been included in this price.
- Within reasonable levels, ELEXON will make available appropriate staff to assist Logica during the development of this change
- No allowance has been made for ELEXON to witness testing.
- Regression testing will only be performed on our own system, with external interfaces being simulated as necessary. No allowance has been made for testing with external systems.
- The cost and durations provided in this HLIA assume that only the CP to which the estimate relates is being implemented. This has been achieved by excluding the effects of other changes.
- It is anticipated that if ELEXON require a DLIA, this will be carried out for a set of changes, and at that stage the timescale impact of implementing several changes can be included in the assessment.
- There will be no new Service Levels.
- The O+M charge has been estimated as a proportion of the price.

If the change is to be incorporated after Go Live, is this change proposed to be a patch or release		
If patch, expected time of incorporation		
If release - what release number	Release number	
Date	Release Date	

For High Level Assessment only – is it a Detailed Level AssessmentYes/No	If No, estimate of time and resources required to complete

Resources Required to undertake	Detailed Level Assessment	Change Quotation
Labour		
Materials		

Consequential amendments to base line:	
Proposed method of Change/ Work statement	The aim of this change is to represent Output Usable Data captured from NGC on the BMRA website, grouped by either Individual genset, NGC Zone or BMRA Zone. A set of options is also costed at a high level where Outage Data is captured in addition to Output Usable data. The website data would be broken into the following categories for each data type: • Current Day Ahead • Current Week Ahead • Archive No GENSET graphing is proposed.
Proposed Plan for Change	Option A1 – 23 weeks Option A2 – 30 weeks Option A3 – 30 weeks Option B1 – 30 weeks Option B2 – 37 weeks Option B3 – 36 weeks

Has the customer has indicated this is a competitive change		No
	Service Provider Plan for competition	
	Risks/Constraints of competition	
	Service Provider plan for incorporation of change including testing	
	Documentation to be produced by Service Provider to enable competition according to plan above	
	Indicative costs of Service Provider role in competition	

For Change Notice only – to be completed by the Customer	
Basis for payment	
Agreed Customer Caused Delay: Yes/No **If Yes, amount of delay**	
Date Change to become effective.	**Is this to be a Release Date? Yes/No**
Other items as required under the Change Management Procedures	

ANNEX 3 – TRANSMISSION COMPANY ANALYSIS

National Grid Company 4/9/01

Transmission Company Analysis
P22 Distribution of Generator Outage Information

Response from National Grid Company

Summary

We welcome the opportunity to offer our views and rationale on the proposed modification. Generator outage plans have both technical and commercial value. It is imperative that we, as System Operator, have access to accurate generator outage plans in order to meet our Licence condition 7A (3(b)) to operate a co-ordinated system. We are concerned that if the individual genset data is published there could be a loss of accuracy because participants perceive that providing the information damages their competitive position and there is the likelihood that participants will become more conservative in notifying outages and/or changes to outages. This view was supported in the recent consultation where one generator expressed the view that publishing individual genset information would have "an adverse effect on the data submitted to NGC". However, we believe that if the information is aggregated zonally it remains useful and avoids revealing each participant's detailed position.

Impact on Licence Obligations and BSC Objectives

The Applicable BSC Objectives (as defined in the Transmission Licence) are:

i. the efficient discharge by the Licensee of the obligations imposed upon it by the licence;

ii. the efficient, economic and co-ordinated operation by the Licensee of the Licensee's Transmission System;

iii. 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; and

iv. promoting efficiency in the implementation and administration of the balancing and settlement arrangements.

The two BSC objectives that we believe are applicable to this modification are (ii) and (iii) above. Within this modification there is a potential benefit to objective (iii) as more information is released, but at the risk of frustrating objective (ii) if there was a loss of accuracy in the information provided to National Grid. We support this modification to the extent that the data released does not result in less accurate information being available to National Grid in seeking to operate a co-ordinated system.

Associated Change to the Grid Code

The wider circulation of individual genset data cannot go ahead unless the Grid Code is modified to relax the confidentiality provision to permit the release of data currently collected for planning purposes (Ref. OC2.4.2.1.(i)). Although we can prepare a re-draft of the Grid Code now, the formal process will involve consideration by members of the Grid Code Review Panel, followed by an Industry consultation,

a report to Ofgem and culminating in Ofgem's determination. The lead-time for implementing such a change is likely to be in the order of 4 months.

Impact on Systems and Processes

National Grid's existing OC2 and Outage databases are sufficiently robust for their current use, but will require some development if they are to be used to support the provision of Market Data. In addition, they pre-date the NETA SPICE genset references and a means of reconciliation will be required.

The specification for [1]A1 and B1 include the provision for individual genset data. If this data, rather than zonal data, is provided to the market, then the materiality of an error in a participant's data is greatly increased. Under these circumstances we believe that it would be appropriate for all parties to provide their data electronically to preclude any transcription errors (currently about half the submissions are made by fax). The quote has been prepared on the basis of electronic submissions. Whilst this does not impose significant costs on National Grid, it will have cost implications for other participants. It should also be noted that we are considering updating the software currently used. There would be an obvious benefit in implementing a change in software and the extension of electronic data transfer to all generating companies simultaneously.

If any of the other options (A2, A3, B2 or B3) were chosen then the existing data submission arrangements could continue.

The specification for options A2 and A3 includes the provision for aggregated Output Useable data. Such data is normally compared to demand and system transfer capability to establish plant surpluses or shortfalls (zonal margins). Accordingly we currently pass zonal margin data to the generators and, as the original intention of this modification was to remove this perceived asymmetry, we have included the provision of margin data in our quote.

Resource estimates for Option A:

OC2 System Development

Familiarisation and Design	£9,750
Documentation	£3,250
Coding	£9,750
System Testing	£13,000
Total	£35,750

NETA SPICE System Development

Design	£6,500
Documentation	£3,250
Coding	£13,000
System Testing	£9,750
Total	£32,500

Integration Testing

Internal Integration Testing	£9,750
End to End Testing	£9,750

1.1.1.1

[1] The Group specified 6 options for consideration in the impact assessment. Option B! is the original Modification Proposal and Option A2 is the Alternative Modification Proposal.

Total	£19,500

This gives an overall total for option A1* or A2 or A3 of £87,750.

* Option A1 would also impose the costs of electronic data transfer on participants currently using faxes as described above.

The specification for options B1, B2 & B3 included a requirement to provide MEL data. However we believe that this is inappropriate as the data is dynamic and long term data would be affected by short term operational factors. Following discussion with Elexon, we understand that this was attempting to replace the generator registered capacity (GRC) term, which no longer exists. However, there is no current variable (other than Output Usable covered under Option A) suitable for combining with the outage plan for the purposes of aggregation.

The original intention of the modification for Option B was to remove the perceived asymmetry between the data available to National Grid and other participants. The outage data we receive only includes start date, end date and a loss of capacity figure (MW loss). This data is intended to be used in determining detailed local running arrangements, with the national or zonal position being assessed via the Output Useable information. The quote has been prepared on the basis of providing the data as provided to us, but we have reservations about the value of aggregating it.

The generators supply National Grid with outage start and finish dates, but not start and finish times. We can therefore only quote for the provision of outage start and finish dates.

Incremental resource estimates for Option B:

Outage System Development

Familiarisation and Design	£13,000
Documentation	£5,200
Coding	£16,250
System Testing	£13,000
Total	£47,450

NETA SPICE System Development

Design	£5,200
Documentation	£3250
Coding	£11,050
System Testing	£7,800
Total	£27,300

Integration Testing

Internal Integration Testing	£9,750
End to End Testing	£9,750
Total	£19,500

This gives an incremental cost for moving from option A to option B of £94,250.

Total Costs and Timetable

	Individual Genset and National	**National Grid OC2 Zone and National**	**BMRA Constraint Zone and National**
Output Usable Data	£87,750*	£87,750	£87,750

Output Usable and Outage Data	£182,000*	£182,000	£182,000

* These options would also impose the costs of electronic data transfer on participants currently using faxes as described above.

The quote has been prepared on the basis of two staff working on Option A and, if necessary, a second pair working on Option B. This implies a project duration of some four months. Taking account of existing commitments, we propose starting work no earlier than 1 December 2001.

If it is decided to co-ordinate the introduction of this development with a change in the software used for electronic data transfer (i.e. to choose an option involving individual genset data), this is likely to delay implementation until September 2002.

Conclusions

In selecting between the six options there are two important questions to be considered:

- Should the data be zonal or genset specific?
- Are Output Usable figures sufficient, or is the actual outage data required?

The question of which zones to use is secondary, and has no impact on the costs as shown in the table above.

In our view, zonal data will give market participants useful information about National/Regional plant surpluses/shortfalls, without jeopardising the quality of the data provided to National Grid by the generators.

On the second question, we do not use the Outage data in an aggregated form and do not see the benefit it provides over Output Usable data. We also note that providing this data would add significantly to the cost of implementing the modification.

Phil Lawton
4/9/01

ANNEX 4 – CONSULTATION RESPONSES

Responses from P22 Assessment Consultation

Representations were received from the following parties:

No	Company	File Number
1.	EDF Trading Ltd	P22_ASS_001
2.	SEEBOARD	P22_ASS_002
3.	Dynegy	P22_ASS_003
4.	TXU Europe Energy Trading Ltd	P22_ASS_004
5.	Edison Mission Energy	P22_ASS_005
6.	ScottishPower Plc	P22_ASS_006
7.	Powergen UK plc	P22_ASS_007
8.	British Energy	P22_ASS_008
9.	Scottish and Southern Energy	P22_ASS_009
10.	NGC	P22_ASS_010
11.	London Electricity	P22_ASS_011
12.	NPower	P22_ASS_012

P22_ASS_001 – EDF Trading Ltd

On behalf of EdF Trading Ltd and EdF (Generation) I would like to give support to the proposed modification to widen the access to generator outage information. In addition, please find herewith some brief responses to some of the questions posed in the P22 Assessment Procedure Consultation Paper.

a) Removing the asymmetry would in our view better facilitate the achievement of the BSC Objectives ii, iii and iv.
b) As for (a).
c) It would be better for it to be collated by NGC and the final coordinated plans could then be released along with the margin data. The website would seem to be a convenient vehicle for dissemination.
e) By Genset would be the most meaningful and transparent information.

Steve Drummond
Consultant to EdF Trading Ltd

P22_ASS_002 – SEEBOARD

SEEBOARD supports the requirements of this proposal. Details have been split into answering those issues raised in section 4.1 of assessment procedure consultation paper.

a) NGC currently has access to market sensitive generator outage information which is not available to other participants. As NGC is free to purchase energy in the prompt and forward markets this gives them an unfair advantage and could create price distortions. Providing outage information to all participants will remove the asymmetry of information and create a level playing field, thus encouraging effective competition to develop. We do not have any strong views on how far ahead this should be provided.

b) Generators currently have access to market sensitive output useable data which is not available to other non-generator participants. This gives generators an unfair advantage and could create price distortions. Providing output useable data to all participants will remove the asymmetry of information and create a level playing field, thus encouraging effective competition to develop.

c) As information is currently held by NGC it would appear to be more efficient to obtain it directly from them. Different deliver scenarios should be examined to provide a cost effective route.

d) We have no comments on this issue.

e) This should be published not aggregating, by Genset. We believe this is important because NGC activities in the Balancing Mechanism are location specific.

f) We do not believe that publishing of Genset derived data creates any material consistency issues.

g) and h) We are very concerned that generators might try to maintain their information advantage by providing poorer quality outage and output useable data to NGC. It is important that current obligations on generators to provide reliable information continues and their performance in this respect should be monitored.

i) We have no strong views on this issue. This information is not specific to BMRA, therefore, it might be more appropriate to publish it on Elexon's website. For most participants it would probably be more convenient to publish it on the BMRA service. However, we do not believe that there is any material difference.

j) This would be useful but not essential information.

k) and l) We have no comments on these two issues.

Dave Morton
SEEBOARD
0190 328 3465

P22_ASS_003 – Dynegy

Modification Proposal P22 – Provision of generator planned outage information to all BSC signatories.

Assessment procedure consultation questions.

i) The removal of asymmetry of access to generator outage information between NGC and all other BSC parties would better fulfil the requirements of condition 7A.3(c) of NGC's Transmission Licence. It is vital to ensure that all information available to NGC is also provided to all market participants, in order to promote effective competition in the generation and supply of electricity, and thus promoting such competition in the sale and purchase of electricity. NGC as System Operator (SO) is active in the forward market and therefore has the ability to distort the forward market and the balancing mechanism by not making information available to all players. The unfair advantage NGC obtains by being the sole party to have access to such data results in a less efficient market developing than may otherwise be achieved.

b) By removing the asymmetry of access to generator output usable data between generators and non-generator BSC parties, would better facilitate the requirement of condition 7A.3(c) of the Transmission Licence. The provision will promote effective competition in the generation and supply of electricity, and promote such competition in the sale and purchase of electricity by creating a level playing field for competition. The provision of outage usable data to all market participants will eliminate the issue of asymmetric information leading to the abolishment of the potential of a commercial advantage created through generators having access to the availability data when trading in the forwards market.

c) Dynegy believe it is probably more efficient to ask generators to duplicate the provision of outage plans and output usable data to Elexon, in addition to their submission to NGC under the Grid Code. This request is applicable to all data flows.

Dynegy recommend that Elexon's website should display both outage data and availability data. We believe this particular method would prevent any inaccurately of information by ensuring that Elexon publish the data at the same time as NGC has access to the information. There should be no distinction between the outage and availability data received by NGC and market participants.

d) Dynegy do believe that there are material issues associated with the governance of collection and publication of generators outage plans and outage usable data that are not readily addressed by appropriate BSC drafting. Generators should be obligated to provide outage plans to both NGC and Elexon, along with the requirement to notify any changes to the outage schedule that may arise. In terms of availability data, we are under the impression the this data flow shall be provided by NGC, therefore the legal draft should incorporate this obligation upon NGC along with the additional duty of notifying any changes to the data that occurs.

e) Dynegy believe it is preferable to publish availability data by not aggregating i.e. by genset, which is as NGC sees it.

f) Dynegy are not aware of any material consistency issues raised by the publication of genset derived data under the provisions in the BSC.

g) & h) Dynegy do believe extending the publication of generator outage plans and output usable data has the potential of reducing the quality of information provided to NGC by generators. However the quality of data can be regulated through the Grid Code. Generators have an obligation under the Grid Code to provide accurate planned outage data and therefore if the information deteriorates to a level that endangers the safety of the transmission system, NGC is capable of taking action. The Grid Code is a binding contract enforced via licences, providing a direct means to ensure a degree of accurately of the data submitted by generators.

Although the potential exists for a deterioration in the accurately of planned outage data, Dynegy continue to support publishing such data in order to eliminate the asymmetry of information that exists at present. The asymmetry of information is detrimental towards the development of competition, endangering the fundamental objective of NETA of creating a transparent and competitive UK electricity market.

i) Dynegy do not believe that there would be a material difference between publishing outage and availability data on the BMRA service or the Elexon website. Dynegy believe that the real priority is to ensure that outage data is duplicated to either the BMRA or Elexon as well as NGC to ensure there is no asymmetry of information.

j) Dynegy do believe that a distinction between the types of generators should be made available when publishing generator outage plans. The nature of outages can be extremely different depending on the type of plant being considered. It would therefore be extremely beneficial to provide a distinction between the outage data provided by different types of generating plants.

k) Dynegy do not have an alternative to the modification proposal P22, however we do support the suggestions made for new data sets illustrated in question k (i-iv). Dynegy believe that these new data flows should be provided in addition to the requests made within the original proposal of outage and availability data.

l) Dynegy believe Elexon, as the BSCCo should also be responsible for monitoring the information provided to NGC and itself, to ensure generators are providing a duplication of data and that no discrepancy between the two flows exist. The BSCCo should also be able to monitor the availability data provided by NGC in terms of accurately.

P22_ASS_004 – TXU Europe Energy Trading Ltd

Below are TXU Europe Energy Trading Ltd's responses to the questions asked in the above consultation. Please note that these are also the views of the following companies: TXU Europe Energy Trading BV; Eastern Electricity; Eastern Energy; Anglian Power Generators Ltd; Peterborough Power Ltd; TXU Europe Drakelow Ltd; TXU Europe High Marnham Ltd; TXU Europe Ironbridge Ltd; TXU Europe West Burton Ltd; TXU Europe Merchant Generation Ltd; Citigen; Norweb Energi; and Shotton CHP Ltd.

a) No
b) Yes
c) Output Usable data is more efficiently obtained from NGC, we do not believe that outage data should be provided.
d) We believe that generator outage data is commercially confidential. NGC use this data for planning purposes, they do not receive a commercial advantage as they are not permitted to undertake speculative trading.
e) i. we believe that the data should be published in its current format
f) n/a
g) No, there are licence and grid code issues surrounding the provision of this data which should ensure no degredation.
h) No
i) no comment
j) No, but we don't believe that such data should be published
k) Yes, as we believe that to release generator outage data would give parties without physical assets an unfair commercial advantage as they would receive information on generator positions and so it is our opinion that this would in fact reduce the effectiveness of objective c, namely promoting competition. However we may support an alternative modification where only output useable data is published
l) Please see above comments regarding the commercial sensitivity of generator outage data.

Regards

Nicola Lea
Market Development Analyst

P22_ASS_005 – Edison Mission Energy

Comments on Modification P22 - Provision of Generator Planned Outage information to all BSC Signatories

I am pleased to provide comments on Modification P25. These comments are provided by Edison Mission Energy (EME) on behalf of three companies Edison First Power Ltd., First Hydro Company and Lakeland Power Ltd.

EME has no objections to the provision of Output Usable data to all market participants provided that the information that is circulated remains unchanged and that there is no further obligation on accuracy beyond the current requirements of the Grid Code.

The Grid Code requires Output Useable data to be a best estimate acting as a reasonable and prudent operator. If this modification is approved, data accuracy should be no more onerous than at present.

We do not support the publication of generator outage plans since it could provide the opportunity for generators to use the information for commercial gain.

c) To ensure that information received by ELEXON / BSC Agent is identical to that provided to NGC, generators should not be required to duplicate their information provision. The information should be obtained from NGC.

e) Output Useable data that is published should be identical to that currently made available to generators. It is unclear why there is a need for zonal definition. Publication of NGC zones would be of little use to non generators as they would not benefit from buying power on a locational basis. We therefore support option i. We do not support publication on a genset by genset basis (option v) as this could ultimately lead to MALC II via the back door.

g) Whilst acknowledging that there requirements within the Grid Code to provide best estimates of outage plans, extending the publication of generator outage plans could well have an impact on information quality. Furthermore, generators in the same locale could use outage information to modify their own outage plans for commercial gain.

h) It seems unlikely that extending the publication of generator Output Useable data would have an adverse impact on information quality if it is aggregated and circulated on a zonal basis. If the information provided is no different to now why should the extension of its circulation impact on the data quality?

i) The data should be published on the most reliable website.

j) If generator outage plans are published on a genset basis, it should be self evident which are peaking and which are baseload. There is no need to make a distinction between different types of plant.

Please do not hesitate to contact me if you wish to discuss these comments further.

Yours faithfully
Libby Glazebrook
Industry Liaison Manager

P22_ASS_006 – ScottishPower Plc

**BSC Modification Proposal P22 –
Provision of Generator Planned Outage Information to all BSC Signatories**

Having given some consideration to the P22 Assessment Procedure Consultation Paper, we would wish to provide the following answers to the specific questions raised therein.

a) Do you think that removing the asymmetry of access to generator Outage information between NGC and all other BSC Parties (for 3 time periods 2 - 52 weeks ahead, 1 – 2 years ahead and 3 – 5 years ahead) would better facilitate the achievement of one or more Applicable BSC Objective?

Yes - it would better promote effective competition in the generation and supply of electricity and insofar as removing any information advantage in forward trading that NGC might have, it would promote efficiency in the implementation and administration of the balancing and settlement arrangements.

b) Do you think that removing the asymmetry of access to generator Output Useable data between generators and other BSC Parties (for the 5 time periods, 2 – 49 days ahead, 2 - 52 weeks ahead, 1 – 2 years ahead and 3 – 5 years ahead) would better facilitate the achievement of one or more Applicable BSC Objective?

Yes - it would better promote effective competition in the generation and supply of electricity.

c) Do you think it preferable to ask generators to duplicate the provision of Outage plans and Output Usable data to ELEXON / BSC Agent or that this information is more efficiently obtained from NGC? If so which one(s) and how?

The most efficient solution would seem to be for NGC to pass on the relevant information to ELEXON who would present it in an agreed aggregated form to the BSC Agent for publishing.

d) Do you consider that there are material issues associated with the governance of collection and publication of generator Outage plans and or generator Output Usable data that are not readily addressed by appropriate BSC drafting?

We are not aware of any.

e) Do you consider it preferable to publish Output Useable data by:
i. NGC Zone without publishing the definition of NGC zones (bearing in mind that the definition of NGC Zones are not currently published),
ii. NGC zone and publish the definition of NGC Zones,
iii. the 5 BMRS Zones,
iv. one zone at the national level, or
v. not aggregating, i.e. by Genset?

iii. the 5 BMRS Zones - a compromise is preferable that breaks down the information into a useful subset (i.e. to greater definition than national level), but does not enable identification of the outages of a small group of gensets.

f) In the event of (e)v. Do you think there are material consistency issues raised by the publication of Genset derived data (i.e. non BM Unit derived) under provisions in the BSC?

Yes.

g) Do you think that extending the publication of generator Outage plans would have an adverse impact on the quality of the information provided to NGC?

No - the Grid Code should be able to ensure quality.

h) Do you think that extending the publication of generator Output Useable data would have an adverse impact on the quality of the information provided to NGC?

No - the Grid Code should be able to ensure quality.

i) If Outage and or Output Usable data were to be provided to all BSC parties, would there be a material difference between publishing this data on the BMRA service or the ELEXON website?

No real preference, but it seems to fit better with the national / zonal data on BMRS.

j) Do you believe that a distinction between types of generators, (e.g. baseload, peaking) should be made when publishing generator outage plans?

No - BSC Parties can do their own analysis.

k) Do you think that an alternative to modification proposal P22 would better facilitate the Applicable BSC Objectives? Such an alternative may take the form of the central calculation and publication of one or more new data sets, such as Daily Margin or Daily Availability (calculated via interpolation of generator Output Usable and generator Outage plans and, in the case of a margin, a demand forecast). The time periods for such new data sets could be:
i. 2 – 49 days ahead, produced daily,
ii. 15 - 365 days ahead (2 - 52 weeks), produced weekly,
iii. 366 – 730 days ahead (1 – 2 years), produced weekly, and
iv. 731 – 1825 days ahead (3 –5 years), produced weekly.

No - BSC Parties should do their own analysis and reporting.

I hope that you will find these comments helpful. However, should you wish further clarification of any of the above, please do not hesitate to contact me.

Yours faithfully,

David Nawrath
ScottishPower Plc and Manweb Plc

P22_ASS_007 – Powergen UK plc

Powergen UK plc ('Powergen') welcomes the opportunity to comment on MODIFICATION PROPOSAL NO: P22 PROVISION OF GENERATOR PLANNED OUTAGE INFORMATION TO ALL BSC SIGNATORIES.

Powergen provides this response on behalf of itself and the following BSC Parties: Powergen Energy plc, Diamond Power Generation Limited, and Cottam Development Centre Limited.

Powergen's response addresses in turn each of the questions put forward in the consultation document.

a. Powergen **does not** believe that removing the asymmetry of access to generator Outage Information between NGC and other BSC Parties will better facilitate applicable BSC Objectives. It is necessary to ensure that a strictly enforced "Chinese wall" is implemented between NGC's Operations and Trading Functions.

b. Powergen believes that removing the asymmetry of access to generator Output Useable data **will** facilitate applicable BSC Objectives (please refer to Powergen's response to question e.

c. Powergen **does not** support duplicating the provision of generator information. To do so would result in a substantial burden being placed upon generators and network operators. It would be far more efficient for NGC to validate/aggregate existing OC2 information flows and send this to Elexon/BMRA.

d. There **are** a number of material issues that will need to be addressed. Currently the data submitted to NGC under OC2 is indicative and non-binding and is provided for the sole purpose of assisting NGC in system planning. NGC is also restricted under Grid Code obligations on the release of such data. Please refer to our response to question e.

e. **Powergen supports Option 1** – NGC Zone without definition of NGC Zones. This option would remove asymmetry, as the information currently provided would then be available to all BSC Parties.

Powergen does not support Option V – not aggregating data i.e. by Genset. This information is commercially sensitive and **Powergen would strongly oppose** any attempt to publish it. See response to questions g & h.

f. Powergen believes that **there are already** a number of material consistency issues in the provision of OC2 data and that **these will be exacerbated** by Option e (V).

g. **Yes,** Powergen believes that the publication of generator outage plans will have an adverse effect on data submitted to NGC and hence affect their system planning ability. The element of goodwill that the current system allows will be removed, as generators will wait until they are absolutely certain of outage plans rather than giving an indicative best estimate. The increased risks to generators will include reduced ability to economically cover their existing contracts for an outage period, and also increased outage costs due to maintenance contractors being able to charge premium rates as start/finish dates for outages will become more onerous.

h. **Yes**, the provision of Output Useable data would have the same impact as detailed in g above

i. Powergen believes that all market data should be available from one source, therefore use of the **BMRA is recommended**. Elexon systems are not designed for such data streams and are likely to require large and expensive changes and would result in market data being split over two systems.

j. **No** distinction should be made between different types of generators as this would allow identification of individual gensets in certain zones.

k. The data types described will need to be defined as part of the current industry work being undertaken as part of the consultations on Transmission Access and Losses under NETA. Powergen believes that an expensive interim solution involving major changes to both central and BSC participants would seem inappropriate.

l. Powergen would like to re-emphasise the point made in k above that the on-going work as part of Transmission Access and Losses under NETA consultations is yet to be concluded. Therefore, implementation of this modification could result in substantial expenditure, reducing NGC system planning ability for a limited period until new Zonal transmission access rights are implemented.

C A Price
Strategy & Regulation
Energy Trading
Powergen UK PLC

P22_ASS_008 – British Energy

BSC Modification Proposal P22 - Provision of Generator Planned Outage Information to All BSC Signatories

British Energy object to this proposal for the following reasons:

1. Release of outage information would discriminate against base-load and non-portfolio generators by revealing the future commercial position of such companies in a manner which is not revealed for other participants, nor for companies in other industries. Note that future availability for a marginal or portfolio generator reveals very little about its planned expected physical operation, and we suspect that not all generators provide outage data to NGC.

2. Release of such information could weaken the incentives on generators to provide accurate information to NGC for planning purposes, something which would act against the interests of participants in general and consumers in particular.

In addition we note the following points:

3. There is no equivalent method of providing data for all participants including individual suppliers. Publishing such data just for generators would be discriminatory.

4. Forward markets are not driven by the outage plans of individual generating units.

5. System margin data is available to all parties for up to a year ahead and provides a key indicator for forward markets. We see no reason for more information to be published.

6. If there are competition concerns about data available to generators collectively which are not available to other parties, our preference would be for no data concerning outages to be published. Data exchanged between NGC and individual participants concerning future outages should relate only to the bilateral interest.

7. Concerns over the capability of NGC to use outage information for commercial advantage should be dealt with directly by regulatory scrutiny.

Responses to specific consultation questions:

4.1 Consultation Questions
a) Do you think that removing the asymmetry of access to generator Outage information between NGC and all other BSC Parties (for 3 time periods 2 - 52 weeks ahead, 1 – 2 years ahead and 3 - 5 years ahead) would better facilitate the achievement of one or more
Applicable BSC Objective?

No - it would discriminate against some parties commercial interests.

b) Do you think that removing the asymmetry of access to generator Output Useable data between generators and other BSC Parties (for the 5 time periods, 2 – 49 days ahead, 2 – 52 weeks ahead, 1 - 2

years ahead and 3 - 5 years ahead) would better facilitate the achievement of one or more Applicable BSC Objective?

If such asymmetry exists, we would prefer it to be removed by making less data available about individual commercial positions, not more.

c) Do you think it preferable to ask generators to duplicate the provision of Outage plans and Output Usable data to ELEXON / BSC Agent or that this information is more efficiently obtained from NGC? If so which one(s) and how?

NGC.

d) Do you consider that there are material issues associated with the governance of collection and publication of generator Outage plans and or generator Output Usable data that are not readily addressed by appropriate BSC drafting?

Yes, because the data is "collected" in accordance with the Grid Code, not the BSC, the BSC has no governance over what the data is or its format.

e) Do you consider it preferable to publish Output Useable data by:
i. NGC Zone without publishing the definition of NGC zones (bearing in mind that the definition of NGC Zones are not currently published),
ii. NGC zone and publish the definition of NGC Zones,
iii. the 5 BMRS Zones,
iv. one zone at the national level, or
v. not aggregating, i.e. by Genset?

One zone at the national level.

f) In the event of (e)v. Do you think there are material consistency issues raised by the publication of Genset derived data (i.e. non BM Unit derived) under provisions in the BSC?

Probably, but probably not particularly material.

g) Do you think that extending the publication of generator Outage plans would have an adverse impact on the quality of the information provided to NGC?

Yes, some companies may be reluctant to reveal their future commercial position in such an explicit manner, and the quality of data provided in accordance with the Grid Code could deteriorate. This would increase the level of uncertainty of system security.

h) Do you think that extending the publication of generator Output Useable data would have an adverse impact on the quality of the information provided to NGC?

As for g).

Martin Mate

for
British Energy Power & Energy Trading Ltd
British Energy Generation Ltd
Eggborough Power Ltd

P22_ASS_009 – Scottish and Southern Energy

This response is sent on behalf of Southern Electric, Scottish and Southern Energy, Keadby Generation Ltd and SSE Energy Supply Ltd.

We support in principle a Modification that will equalise access of information to all participants. We are not convinced however that this Modification achieves this nor that the BSC is the appropriate place to resolve perceived issues with NGC's use of such information. We are not convinced that there is a material issue to be resolved here.

Whatever solution is put in place, it must not be allowed to detract from the accurate provision of information to NGC, as this could have an impact on planning, constraint costs and ultimately security of supply. Whatever data and resolution of data it is decided should be made public, the provision of such should ensure that generators business confidentiality is not affected.

Consultation Questions

a) Do you think that removing the asymmetry of access to generator Outage information between NGC and all other BSC Parties (for 3 time periods 2 - 52 weeks ahead, 1 – 2 years ahead and 3 - 5 years ahead) would better facilitate the achievement of one or more Applicable BSC Objective?

   No. Generator outage information is provided to NGC to ensure system security.
   The information is commercially sensitive. If there is perceived to be an issue with the misuse of this information by NGC, (as per their obligations under the Grid Code) then this should be addressed outwith the BSC, through the Grid Code. It is questionable whether this is within the scope of the BSC, is the BSC cutting across the Grid Code? Provision of this information to all, i.e. to wider than just BSC signatories, is tackling the perceived problem from the wrong direction.

b) Do you think that removing the asymmetry of access to generator Output Useable data between generators and other BSC Parties (for the 5 time periods, 2 - 49 days ahead, 2 – 52 weeks ahead, 1 - 2 years ahead and 3 - 5 years ahead) would better facilitate the achievement of one or more Applicable BSC Objective?

   The provision of this data to other BSC Parties as it is currently provided to generators should better facilitate the Applicable BSC Objectives.

c) Do you think it preferable to ask generators to duplicate the provision of Outage plans and Output Useable data to ELEXON / BSC Agent or that this information is more efficiently obtained from NGC? If so which one(s) and how?

   Outage plans should not be provided. Providing the provision of information is not cutting across the Grid Code, then the data should be provided by NGC to BMRA for publication on the BMRS without duplication from the generator.

d) Do you consider that there are material issues associated with the governance of collection and publication of generator Outage plans and or generator Output Useable data that are not readily addressed by appropriate BSC drafting?

We think that there are indeed issues of governance. These are between the BSC and Grid Code. Is it appropriate that these changes are made through the BSC without reference to the Grid Code Review Panel?

e) Do you consider it preferable to publish Output Useable data by:
   i. NGC Zone without publishing the definition of NGC zones (bearing in mind that the definition of NGC Zones are not currently published),
   ii. NGC zone and publish the definition of NGC Zones,
   iii. the 5 BMRS Zones,
   iv. one zone at the national level, or
   v. not aggregating, i.e. by Genset?

   In order to preserve commercial confidentiality, no greater than zonal margin data should be provided. This could conveniently be provided by the 5 BMRS zones currently in use.

f) In the event of (e)v. Do you think there are material consistency issues raised by the publication of Genset derived data (i.e. non BM Unit derived) under provisions in the BSC?

g) Do you think that extending the publication of generator Outage plans would have an adverse impact on the quality of the information provided to NGC?

   It is not possible to predict how this information will be provided, but it is difficult to envisage the data accuracy for NGC's operational planning purposes improving. The provision of this information at present is purely for operational planning purposes, with no influence on the market. If published this Outage information will doubtless have an influence on the market, and that influence is likely to be taken account of by the generator in their planning and their submission of data. In addition there could of course be the opportunity to mis-inform the market. In summation, we believe that the provision of this information will have an adverse impact on the quality of information provided to NGC.

h) Do you think that extending the publication of generator Output Useable data would have an adverse impact on the quality of the information provided to NGC?

   As long as the data is provided to the market on a zonal basis, then there should be no reason for the accuracy to decrease.

i) If Outage and or Output Useable data were to be provided to all BSC parties, would there be a material difference between publishing this data on the BMRA service or the ELEXON website?

   There should be no Outage data provided. Output Useable or margin data could be published on either website, but seems to be more in line with the other information currently on the BMRA service, and so should be published there.

j) Do you believe that a distinction between types of generators, (e.g. baseload, peaking) should be made when publishing generator outage plans?

No. There should be no generator outage data published. There is no reason to distinguish between different plant types. By splitting into these categories, commercial confidentiality will be more easily compromised.

k) Do you think that an alternative to modification proposal P22 would better facilitate the Applicable BSC Objectives? Such an alternative may take the form of the central calculation and publication of one or more new data sets, such as Daily Margin or Daily Availability (calculated via interpolation of generator Output Useable and generator Outage plans and, in the case of a margin, a demandforecast). The time periods for such new data sets could be:

i. 2 - 49 days ahead, produced daily,
ii. 15 - 365 days ahead (2 - 52 weeks), produced weekly,
iii. 366 - 730 days ahead (1 - 2 years), produced weekly, and
iv. 731 - 1825 days ahead (3 - 5 years), produced weekly.

Yes. If Daily Margin is published on a zonal basis (5 BMRS zones) then this would facilitate the levelling of the playing field between generators and other participants. The publication of Outage plans is not the route to take to level the playing field between NGC and others. If there are concerns with NGC's Chinese walls, then this needs dealt with by Ofgem outwith the BSC.

l) Are there any other matters that you consider relevant to Modification Proposal P22 that have not, so far, been addressed?

Whatever solution is put in place, it must not be allowed to detract from the accurate provision of information to NGC as this could have an impact on planning, constraint costs and ultimately security of supply. Whatever data and resolution of data it is decided should be made public, the provision of such should ensure that generators business confidentiality is not affected.

Regards
Robert Hackland

P22_ASS_010 – NGC

Summary

Generator outage plans have both technical and commercial value. It is imperative that we as System Operator have access to accurate generator outage plans. We are concerned that if the full outage plans are published there could be a loss of accuracy if participants perceive that providing the information damages their competitive position and there is the likelihood that participants will become more conservative in notifying outages and/or changes to outages. However, we believe that if the information is aggregated zonally it remains useful and avoids revealing each participant's detailed position.

a) Do you think that removing the asymmetry of access to generator Outage information between NGC and all other BSC Parties (for 3 time periods 2 - 52 weeks ahead, 1 – 2 years ahead and 3 – 5 years ahead) would better facilitate the achievement of one or more Applicable BSC Objective?

Our requirement for this data is technical in order to fulfil our License obligations as System Operator. Whatever the conclusion is for this modification it is imperative that the accuracy of our existing Grid Code data stream is not impaired

The two BSC objectives that we believe are applicable to this modification are B1.2.1(b) (ii) and (iii) namely;

(ii) the efficient, economic and co-ordinated operation by the Transmission Company of the Transmission System.

(iii) promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase (as defined in the Transmission Licence) of electricity

Within this modification there is a potential benefit to objective (iii) as more information is released, but at risk of frustrating objective (ii) if there was a loss of accuracy in the information provided to National Grid. We support this modification provided the data released does not result in less accurate information being available to National Grid in seeking to operate a co-ordinated system.

b) Do you think that removing the asymmetry of access to generator Output Useable data between generators and other BSC Parties (for the 5 time periods, 2 – 49 days ahead, 2 - 52 weeks ahead, 1 – 2 years ahead and 3 – 5 years ahead) would better facilitate the achievement of one or more Applicable BSC Objective?

See answer for (a) above.

c) Do you think it preferable to ask generators to duplicate the provision of Outage plans and Output Usable data to ELEXON / BSC Agent or that this information is more efficiently obtained from NGC? If so which one(s) and how?

To duplicate the provision would be inefficient, as the data already comes to us. We would be willing to pass the information we receive in the current electronic format, however only half of the OC2 data is currently received electronically.

d) Do you consider that there are material issues associated with the governance of collection and publication of generator Outage plans and or generator Output Usable data that are not readily addressed by appropriate BSC drafting?

Currently we collect OC2 data under the provisions of the Grid Code for technical use and pass on high level data to the BMRS for publication. This high level data is sufficiently aggregated so no individual generator position is compromised. If there is a move to more detailed information, we suggest the BSC needs to be drafted to permit this to happen.

e) Do you consider it preferable to publish Output Useable data by:

i. NGC Zone without publishing the definition of NGC zones (bearing in mind that the definition of NGC Zones are not currently published),
ii. NGC zone and publish the definition of NGC Zones,
iii. the 5 BMRS Zones,
iv. one zone at the national level, or
v. not aggregating, i.e. by Genset?

We believe that the preferred solution is to publish Output Useable data by the 5 BMRS Zones, however consideration could be given to increasing the number of zones providing each zone remained large enough to prevent an individual participant's position being disclosed.

f) In the event of (e)v. Do you think there are material consistency issues raised by the publication of Genset derived data (i.e. non BM Unit derived) under provisions in the BSC?

Yes, see answer to (d).

g) Do you think that extending the publication of generator Outage plans would have an adverse impact on the quality of the information provided to NGC?

We believe that generator outage plans are commercially sensitive to the individual company and by making them public could bias the information provided. However, we support the availability of aggregated data to provide useful information without revealing information at the discrete individual generator unit level.

h) Do you think that extending the publication of generator Output Useable data would have an adverse impact on the quality of the information provided to NGC?

See above answer to (g)

i) If Outage and or Output Usable data were to be provided to all BSC parties, would there be a material difference between publishing this data on the BMRA service or the ELEXON website?

No opinion.

j) Do you believe that a distinction between types of generators, (e.g. baseload, peaking) should be made when publishing generator outage plans?

By separating out distinct types of generators, this may effectively disclose individual generator data. In addition the precise definition for types of plant may cause problems especially for plant with a variable load factor. For the reasons stated we believe this distinction should not be made.

k) Do you think that an alternative to modification proposal P22 would better facilitate the Applicable BSC Objectives?

Such an alternative may take the form of the central calculation and publication of one or more new data sets, such as Daily Margin or Daily Availability (calculated via interpolation of generator Output Usable and generator Outage plans and, in the case of a margin, a demand forecast). The time periods for such new data sets could be:

i. 2 – 49 days ahead, produced daily,
ii. 15 - 365 days ahead (2 - 52 weeks), produced weekly,
iii. 366 – 730 days ahead (1 – 2 years), produced weekly, and
iv. 731 – 1825 days ahead (3 –5 years), produced weekly.

We believe that the concept of zones provides the user with useful information as long as the individual company cannot be identified. With reference to time periods we intend to review the existing OC2 information exchange independently of this modification. As part of this review, our intention is to propose the following:

- 2-49 days ahead produced daily.
- 50-365 days (8-52 week) ahead produced weekly.
- 366-730 days (1-2 years) ahead produced six monthly.
- 731-1825 days (3-5 years) ahead produced yearly.

l) Are there any other matters that you consider relevant to Modification Proposal P22 that have not, so far, been addressed?

No.

P22_ASS_011 – London Electricity

I apologise that this response was not sent on Friday.

Modifications Secretary 10th August 2001

Dear Sir,

Thank you for the opportunity to comment on Modification Proposal P22. Please find below responses to your questions in the order they were raised :

Do you think that removing the asymmetry of access to generator Outage information between NGC and all other BSC Parties (for 3 time periods 2 - 52 weeks ahead, 1 - 2 years ahead and 3 - 5 years ahead) would better facilitate the achievement of one or more Applicable BSC Objective?

- yes, we do. It has been a notable anomaly for many years that suppliers do not have access to the same information as generation and distribution businesses. Since there is a natural historic tendency for generators to have a better understanding of generation outage needs and its effect on the transmission system than suppliers, it is not helpful to the development of the demand-side under NETA that there should be an informational asymmetry. We do not have fixed views over whether this should be addressed under the BSC or under the Grid Code. Clearly the proposer has felt that the change can more readily be achieved via the BSC governance and we would not oppose this route. This modification facilitates BSC objective (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"

Do you think that removing the asymmetry of access to generator Output Useable data between generators and other BSC Parties (for the 5 time periods, 2 - 49 days ahead, 2 - 52 weeks ahead, 1 - 2 years ahead and 3 - 5 years ahead) would better facilitate the achievement of one or more Applicable BSC Objective?

- yes, for the reason stated above.

Do you think it preferable to ask generators to duplicate the provision of Outage plans and Output Usable data to ELEXON / BSC Agent or that this information is more efficiently obtained from NGC? If so which one(s) and how?

-= Duplication from the generator participant is undesirable and it would be less burdensome on participants for NGC to act as the conduit.

Do you consider it preferable to publish Output Useable data by:

i. NGC Zone without publishing the definition of NGC zones (bearing in mind that the definition of NGC Zones are not currently published),
ii. NGC zone and publish the definition of NGC Zones,
iii. the 5 BMRS Zones,
iv. one zone at the national level, or
v. not aggregating, i.e. by Genset?

- It would seem most sensible to publish the data under (i)

Do you think that extending the publication of generator Outage plans would have an adverse impact on the quality of the information provided to NGC?

- no, since the obligations would remain unchanged.

Liz Anderson
(London Electricity, South Western Electricity, Jade Power and Sutton Bridge Power)

P22_ASS_012 – Npower

Npower – Terry Ballard
Please find attached the response to the above on behalf of Innogy plc,
Npower Ltd, Yorkshire Electricity Group.

a) A differentiation should be made between information and data. We believe that it is data that is being released. The onus is upon those receiving the data to manipulate it into information. Such analysis will require considerable resources. In principle we have no objection to the data being more widely available.

b) Generators do not receive information regarding other generators. Therefore there is not an asymmetry. The release of data regarding Transmission and Distribution outages would make a greater contribution to removing asymmetry in the market and thus meet BSC Obligations.

c) It is data rather than information. It should be provided by NGC.

d) The data is currently provided under the Grid Code as planning background to facilitate the technical operation of the system. There are concerns that it may be used for purposes beyond those for which it was intended.

e) The data is indicative and therefore disaggregation would be unreliable. Therefore, e (iv) is the most appropriate.

f) E (v) is inappropriate as there would be inconsistencies in the robustness of the data provided.

g) No – as long as the data is provided on the same basis as currently under the Grid Code.

h) No – see (g) above.

i) No

j) No

k) Provision of Daily Margin or Daily Availability data sets, based on current Planning Information seems reasonable not withstanding the comments regarding the efficacy of the data. This could be provided by NGC although it should not reduce their obligations under LC10. This route would prevent smaller players being disadvantaged or overwhelmed by large amounts of data. It would also mitigate against company specific market sensitive information being incorrectly interpreted.