

September 2001

ASSESSMENT REPORT
MODIFICATION PROPOSAL P22 –
Provision of Generator Planned
outage Information to all BSc
Signatories

Prepared by the Reporting Modification Group on
behalf of the Balancing and Settlement Code Panel

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b Distribution

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1 SUMMARY AND RECOMMENDATIONS

1.1 Recommendations

On the basis of the analysis, consultation and assessment undertaken in respect of Modification Proposal P22 during the Assessment Phase, and the resultant findings of this report, the Modification Group recommends that the BSC Panel should:

- a) Publish Output Usable data on the ELEXON web site and source this data from NGC as defined in the Alternative Modification Proposal.
- b) Proceed to the Report Phase and recommend to the Authority that the Alternative Modification proposal is approved with an implementation date of 1 April 2002, subject to a positive Authority decision by 1 December 2001.

1.2 Background

Modification Proposal P22 was raised by Dynegey UK Limited on the 22 June 2001 and subsequently considered by the Panel on the 28 June 2001, where it was agreed that the Modification Group should proceed with a Definition Report. A Definition Report was published on the 19 July 2001 and the Panel agreed that the Proposal move to the Assessment Procedure. This report is the conclusion of that Assessment.

The purpose of the Assessment Procedure is to evaluate whether the Modification Proposal better facilitates achievement of the Applicable BSC Objectives and whether any alternative modification would, as compared with the Proposed Modification, better facilitate the achievement of the Applicable BSC Objectives in relation to the issues or defect identified in the Modification Proposal.

The Applicable BSC Objectives (as defined in Condition 7A (3) of 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.

1.3 Rationale for Recommendations

The original Modification Proposal as submitted by the Proposer was necessarily documented at a business, or high, level. On further investigation the Modification Group identified that a number of options were present within Modification Proposal P22. The identified options were primarily associated with precisely *"what"* data might be published and *"how"* that data might be published. Each of these is discussed below.

The Group were also mindful of the fact that NGC had advised as part of their impact assessment that if the original proposal were implemented they would advise that all genset data sent into them by generating companies would need to be transferred electronically. This electronic transfer is designed to mitigate against the possibility of transcript errors associated with individual gensets being published. The Group considered that the original proposal could therefore impose a significant impact

on those generators that do not currently use electronic data transfer mechanisms into NGC, currently indicated by NGC to be around half.

1.3.1 Data Options

Two main questions were identified when the Group were considering “what” should be published, these were (1) what level of aggregation for the various data sets is most appropriate and (2) which data sets better facilitate BSC objectives?

Aggregation

In terms of what level of aggregation was most appropriate, the Group identified three options

- i. No aggregation
- ii. Aggregation to NGC Zone
- iii. Aggregation to BMRS Zone

The majority of the Modification Group concluded that publishing data which is aggregated by NGC zone is preferable as it is consistent with current publication formats and does not identify individual generating stations thereby potentially commercially disadvantaging them.

Data Sets

As requested by the Panel a consultation exercise was undertaken during the Assessment phase that included questions associated with the better facilitation of BSC objectives. Consultation responses were broadly split as to whether the publication of only one or both proposed data sets (Output Useable and / or Outage data) better facilitated BSC Objectives.

The majority of the Modification Group believe that publishing only generator Output Usable data better facilitates BSC objectives as it removes the asymmetry of access to the data but does not give rise to the potential reduction in the quality of planning data available to the Transmission Company.

1.3.2 Publication Mechanism

Consistent with the Panels request the Modification Group considered two options for the publication of data under Modification Proposal P22, these are:

- i. The BMRS; or
- ii. The ELEXON website.

Both publication mechanisms were considered for each of the options identified by the Group, although the Group felt, given the purpose of the BMRS, that the data would probably be more appropriately published on the BMRS. On consideration of the impact assessment analysis from the BMRA and ELEXON the Modification Group, bearing in mind BSC Objective (iv) associated with efficiency in the implementation of the trading arrangements, decided that publishing the data via the ELEXON website was preferable. The Group also noted that if Parties, in future, felt that the data was more appropriately published via the BMRA then a Change Request could be raised. Such a Change Request would be subject to industry impact assessment and could be incorporated within another BSC Systems project and therefore potentially benefit from economies of scope and scale.

The Modification Group wish to note that, although the quotations received from the BMRA and ELEXON for the provision of data are not identical and that the services provided by each differ in terms of reliability, service levels and connectivity, the difference in cost is so significant to be outrageous.

2 INTRODUCTION

This Report has been prepared by ELEXON Ltd., on behalf of the Balancing and Settlement Code Panel ('the Panel'), in accordance with the terms of the Balancing and Settlement Code ('BSC'). The BSC is the legal document containing the rules of the balancing mechanism and imbalance settlement process and related governance provisions. ELEXON is the company that performs the role and functions of the BSCCo, as defined in the BSC.

An electronic copy of this document can be found on the BSC website, at www.elexon.co.uk

3 PURPOSE AND SCOPE OF THE REPORT

BSC Section F sets out the procedures for progressing proposals to amend the BSC (known as 'Modification Proposals'). These include procedures for proposing, consulting on, developing, evaluating and reporting to the Authority on potential modifications.

The BSC Panel is charged with supervising and implementing the modification procedures. ELEXON provides the secretariat and other advice, support and resource required by the Panel for this purpose. In addition, if a modification to the Code is approved or directed by the Authority, ELEXON is responsible for overseeing the implementation of that amendment (including any consequential changes to systems, procedures and documentation).

The Panel may decide to submit a Modification Proposal to an 'Assessment Procedure'¹. Under this procedure, a Modification Group is tasked with undertaking a detailed assessment of the proposal to evaluate whether it better facilitates achievement of the Applicable BSC Objectives². The group may also develop an alternative proposal if it believes that the alternative would better facilitate achievement of the objectives.

The Modification Group must prepare a report for the Panel, setting out the results of the assessment of the modification proposal and any alternative. The following matter should be included (to the extent applicable to the proposal in question)³:

- (a) an analysis of and the views and rationale of the Modification Group as to whether (and, if so, to what extent) the Proposed Modification would better facilitate achievement of the Applicable BSC Objective(s);
- (b) a description and analysis of any Alternative Modification developed by the Modification Group which, as compared with the Proposed Modification, would better facilitate achievement of the Applicable BSC Objective(s) and the views and rationale of the Group in respect thereof;
- (c) an assessment or estimate (as the case may be) of:
 - (i) the impact of the Proposed Modification and any Alternative Modification on BSC Systems;
 - (ii) any changes and/or developments which would be required to BSC Systems in order to give effect to the Proposed Modification and any Alternative Modification;
 - (iii) the total development and capital costs of making the changes and/or delivering the developments referred to in paragraph (ii);
 - (iv) the time period required for the design, build and delivery of the changes and/or developments referred to in paragraph (ii);
 - (v) the increase or decrease in the payments due under the BSC Agent Contracts in consequence of the Proposed Modification and any Alternative Modification;
 - (vi) the additional payments (if different from those referred to in paragraph (v)) due in connection with the operation and maintenance of the changes and/or developments

1.1.1.1

¹ See BSC F2.6

² As defined in the Transmission Licence

³ See BSC F2.6.4 and Annex F-1

- to BSC Systems as a result of the Proposed Modification and any Alternative Modification;
- (vii) any other costs or liabilities associated with BSC Systems attributable to the Proposed Modification and any Alternative Modification;
- (d) an assessment of:
- (i) the impact of the Proposed Modification and any Alternative Modification on the Core Industry Documents;
 - (ii) the changes which would be required to the Core Industry Documents in order to give effect to the Proposed Modification and any Alternative Modification;
 - (iii) the mechanism and likely timescale for the making of the changes referred to in paragraph (ii);
 - (iv) the changes and/or developments which would be required to central computer systems and processes used in connection with the operation of arrangements established under the Core Industry Documents;
 - (v) the mechanism and likely timescale for the making of the changes referred to in paragraph (iv);
 - (vi) an estimate of the costs associated with making and delivering the changes referred to in paragraphs (ii) and (iv),
- together with a summary of representations in relation to such matters;
- (e) an assessment of:
- (i) the likely increase or decrease in BSC Costs (to the extent not already taken into account in paragraph (c) above) in consequence of the Proposed Modification and any Alternative Modification;
 - (ii) the changes required to Systems and processes of BSCCo in order to give effect to the Proposed Modification and any Alternative Modification; and
 - (iii) the BSC Costs which are expected to be attributable to the implementation of the Proposed Modification and any Alternative Modification, to the extent not taken into account under any other provision above;
- (f) to the extent such information is available to the Modification Group, an assessment of the impact of the Proposed Modification and any Alternative Modification on Parties in general (or classes of Parties in general) and Party Agents in general, including the changes which are likely to be required to their internal systems and processes and an estimate of the development, capital and operating costs associated with implementing the changes to the Code and to Core Industry Documents;
- (g) an assessment of the Proposed Modification and any Alternative Modification in the context of the statutory, regulatory and contractual framework within which the Code sits (taking account of relevant utilities, competition and financial services legislation);
- (h) a summary of the representations made by Parties and interested third parties during the consultation undertaken in respect of the Proposed Modification and any Alternative Modification and the views and comments of the Modification Group in respect thereof;

- (i) a summary of the analysis and impact assessment prepared by the Transmission Company and the views and comments of the Modification Group in respect thereof;
- (j) a summary of the impact assessment prepared by relevant BSC Agents and the views and comments of the Modification Group in respect thereof;
- (k) a summary of any impact assessment prepared by Core Industry Document Owners and the views and comments of the Modification Group in respect thereof;
- (l) a copy of the terms of reference and any report or analysis of external consultants or advisers engaged in respect thereof;
- (m) a list of the key assumptions which the Modification Group has made in formulating its views;
- (n) any other matters required by the terms of reference of such Modification Group;
- (o) any other matters which the Modification Group consider should properly be brought to the attention of the Panel to assist the Panel in forming a view as to whether the Proposed Modification and any Alternative Modification would better facilitate achievement of the Applicable BSC Objective(s);
- (p) subject to paragraph 2.6.8 and 2.6.9 of Section F of the BSC, the proposed text to modify the Code in order to give effect to the Proposed Modification and any Alternative Modification, together with a commentary setting out the nature and effect of such text and of other areas of the Code which would be affected by the changes;
- (q) the Modification Group's proposed Implementation Date(s) for implementation (subject to the consent of the Authority) of the Proposed Modification and any Alternative Modification;
- (r) an executive summary of the project brief prepared by BSCCo;
- (s) a recommendation (where applicable) as to whether, if the Proposed Modification or Alternative Modification is approved, Settlement Runs and Volume Allocation Runs carried out after the Implementation Date of such Approved Modification in respect of Settlement Days prior to that date should be carried out taking account of such Approved Modification or not;
- (t) the proposed text (if any) to modify the Memorandum and Articles of Association of BSCCo and/or the BSC Clearer in order to give effect to the Proposed Modification and any Alternative Modification, together with a commentary setting out the nature and effect of such text and of other areas of the Memorandum and Articles of Association and/or the Code which would be affected by the changes; and
- (u) a summary of any changes which would be required to Code Subsidiary Documents as a consequence of such Proposed Modification or Alternative Modification.

This Assessment Report therefore addresses all of the above items to the extent relevant to the Modification Proposal in question.

4 MODIFICATION GROUP DETAILS

This Assessment Report has been prepared by the Reporting Modification Group. The Membership of the Modification Group was as follows:

Adam Higginson	Ofgem	Attendee
Chris Rowell	ELEXON	Attendee
Duncan Jack	St Clements Services	Member
Lisa Waters	Dynegy (Proposer)	Member
Martin Mate	British Energy	Member
Nigel Brooks	NGC	Member
Rekha Patel	Dynegy	Attendee
Terry Ballard	Innogy	Member
Tim Pearson-Young	ELEXON	Attendee

5 DESCRIPTION AND ASSESSMENT AGAINST THE APPLICABLE BSC OBJECTIVES

This section describes the Proposed Modification as developed by the Modification Group, it goes on to provide an analysis of the views and rationale of the Modification Group as to whether the Proposed Modification would better facilitate the achievement of the BSC Objectives. An Alternative Modification is also presented that is considered by the majority of the Group to better facilitate the BSC Objectives together with supporting rationale.

5.1 The Proposed Modification

The original Modification Proposal as developed by the Modification group is characterised by the following: The BMRA would receive from NGC a series of files that contain Output Usable (availability) and Outage data. On receipt of these files the data will be published on the BMRS website within the time scales currently established for the display of other NGC information.

Data files would be received by the BMRA every working day from NGC via the high grade network. All the new data sets published on the BMRA under Modification Proposal P22 would be available for download and displayed graphically.

The BMRA would provide a facility to allow historic files to be downloaded from the website. The availability of historic files shall be;

- For daily files; the six previously received files should be available, by type
- For weekly files; the three previously received files should be available, by type
- For six monthly files; the previously received file should still be available, by type

The new data would be covered by existing service agreements in terms of security, system resilience and Back Up and Recovery Requirements.

It should be noted that although the original Proposal specifically referred to the publication of the defined data via the BMRS the Group, in line with the Panels request, also considered its publication on the ELEXON website.

5.1.1 Data Sets Defined

This section defines the data sets comprising the original Modification Proposal. The data sets are categorised as either Output Usable data or Outage data. It is worth noting that the nature of these data sets and their timing is based on and consistent with OC2 of the Grid Code.

5.1.1.1 Output Useable

Ten Output Useable data sets are defined. These include 5 data sets publishing Output Usable data by genset and 5 that publish Output Usable data at the National level. The paragraphs below define the 10 Output Usable data sets (a) to (e ii).

- a) A data set that contains MW Output Usable data for each individual genset will be published. This will contain daily data for the period 2 – 14 days ahead. A new file will be available on a daily basis.
 - a ii) A subsidiary data set will also be published, this is equal to the sum of all genset MW Output Usable values by day (national) for the period 2 – 14 days ahead and will be available in the same time scales as (a).

- b) A data set that contains MW Output Usable data for each individual genset will be published. This will contain daily data for the period 2 – 49 days ahead. A new file will be available on a weekly basis.
 - b ii) A subsidiary data set will also be published, this is equal to the sum of all genset MW Output Usable values by day (national) for the period 2 – 49 days ahead and will be published in the same time scales as (b).
- c) A data set that contains MW Output Usable data for each individual genset will be published. This will contain weekly data for the period 2 – 52 weeks ahead. This will be published on a weekly basis.
 - c ii) A subsidiary data set will also be published, this is equal to the sum of all genset MW Output Usable values by week (national) for the period 2 – 52 weeks ahead and will be published in the same time scales as (c).
- d) A data set that contains MW Output Usable data for each individual genset will be published. This will contain weekly data for the period 1 - 2 years ahead. This will be published on a six monthly basis.
 - d ii) A subsidiary data set will also be published, this is equal to the sum of all genset MW Output Usable values by week for the period 1 – 2 years ahead and will be published in the same time scales as (d).
- e) A data set that contains MW Output Usable data for each individual genset will be published. This will contain weekly data for the period 3 – 5 years ahead. This will be published on a six monthly basis.
 - e ii) A subsidiary data set will also be published, this is equal to the sum of all genset MW Output Usable values by week for the period 3 – 5 years ahead and will be published in the same time scales as (e).

5.1.1.2 Outage data

Six Outage data sets are defined for the Original Proposal. These include 3 publishing Outage data for each individual genset and 3 that publish Outage data at the National level. The paragraphs below define the 6 Outage data sets (f) to (h ii).

- f) A data set should be produced containing Outage data for each individual genset, which shall include Station Name, Outage Start Date, End Date. This should contain data for the period 2 – 52 weeks ahead. This will be published on a weekly basis.
 - f ii) A subsidiary data set will also be published, equal to MW sum of all genset outages for each week for the period 2 – 52 weeks ahead and be published in the same time scales as (f).
- g) A data set should be produced containing Outage data for each individual genset, which shall include Station Name, Outage Start Date, End Date. This should contain data for the period 1 - 2 years ahead. This will be published on a six monthly basis.
 - g ii) A subsidiary data set will also be published, equal to MW sum of all genset outages for each week for the period 1 – 2 years ahead and be published in the same time scales as (g).
- h) A data set should be produced containing Outage data for each individual genset, which shall include Station Name, Outage Start Date, End Date and End Time. This should contain data for the period 3 - 5 years ahead. This will be published on a six monthly basis.
 - h ii) A subsidiary data set will also be published, equal to MW sum of all genset outages for each week for the period 3 – 5 years ahead and be published in the same time scales as (h).

5.2 Assessment of Original Proposal Against BSC Objectives

Modification Group Members were not in a position to unanimously agree whether the Modification Proposal better achieves BSC Objectives. Although the majority of the Group agreed with the principle of equality of access to market information in a competitive market and that such a principle was aligned with and would better facilitate BSC Objective (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”

Some Group Members noted that such a principle could potentially give rise to an inequality between some classes of market participant. It is argued by some Group Members that such inequality could result in some classes of market participant (e.g. companies that own a single inflexible plant) publishing commercially sensitive data. While other companies (e.g. those with multiple flexible plant) publish data that is not commercially sensitive in the same way.

Some Group Members felt that the Modification Proposal gave rise to a ‘trade-off’ between two of the BSC objectives. Those Group Members suggested that, specifically relating to this Modification Proposal, objective (ii) associated with efficiency of system operation was, to some extent, in conflict with objective (iii) associated with efficient market operation. Those Group Members felt that this conflict arose because of the potential for the quality of data received by the System Operator to decrease as a result of wider dissemination.

The Group noted that the Proposal seeks to address two different information asymmetries that are suggested to be apparent in the current arrangements. These are: (1) an asymmetry between generators and non-generators and (2) an asymmetry between NGC and all other BSC Signatories. Each of these are discussed in more detail below.

5.2.1 Generator and Non-Generator Asymmetry

The asymmetry associated with generators and non-generators results from access by generators to Zone specific Output Usable data. The majority of the Group believed that the publication of Output Usable data would remove this asymmetry and, consistent with BSC Objectives, better promote effective competition in the generation and supply of electricity.

Some Group Members expressed the view that the asymmetry of access to Output Usable data could equally effectively be removed by not providing it to generators as opposed to providing it additionally to non generators. This approach would be a matter for NGC and the Grid Code and therefore outside of the scope of the BSC and the remit of the Modification Group.

5.2.2 NGC Asymmetry

The asymmetry associated with NGC and all other BSC Signatories results from access by NGC to generator Outage plans (indicative and firm) for a period up to five years in advance. Whilst some Group Members thought that removing this asymmetry by publishing the data to all BSC Signatories would better facilitate BSC Objectives others did not.

It was argued by some Group Members that NGC as a “major player” in forwards markets could, in principle, use its access to generator Outage data for commercial gain. Publishing generator Outage data to all BSC Signatories would help to “level the playing field”.

Some Group Members noted that NGC has a unique position within the market. It is subject to a number of licence conditions designed to ensure that Outage data is used for prescribed purposes only. This is a matter for the Licensing Authority and need not be addressed through the BSC.

5.3 Alternative Modification

In light of the arguments presented above regarding the better achievement of BSC Objectives and the relative merits of publishing Output Usable data and or generator Outage Data the majority of the Modification Group thought that an Alternative Proposal seeking to publish only Output Usable data aggregated by NGC Zone would, as compared with the original Modification Proposal, better facilitate BSC Objectives.

5.3.1 Alternative Proposal Data

Ten data sets are defined for the Alternative Modification Proposal. These include 5 data sets publishing Output Usable data by ⁴NGC Zone and 5 that publish Output Usable data at the National level. The paragraphs below define the 10 Output Usable data sets (i) to (m ii),.

- i) A data set that contains MW Output Usable data aggregated by NGC Zone will be published. This will contain daily data for the period 2 – 14 days ahead. This will be published on a daily basis.
 - i ii) A subsidiary data set will also be published, this is equal to the sum of all NGC Zone's MW Output Usable values by day for the period 2 – 14 days ahead and will be published in the same time scales as (i).
- j) A data set that contains MW Output Usable data aggregated by NGC Zone will be published . This will contain daily data for the period 2 – 49 days ahead. This will be published on a weekly basis.
 - j ii) A subsidiary data set will also be published, this is equal to the sum of all NGC Zone's MW Output Usable values by day for the period 2 – 49 days ahead and will be published in the same time scales as (j).
- k) A data set that contains MW Output Usable data aggregated by NGC Zone will be published. This will contain weekly data for the period 2 – 52 weeks ahead. This will be published on a weekly basis.
 - k ii) A subsidiary data set will also be published, this is equal to the sum of all NGC Zone's MW Output Usable values by week for the period 2 – 52 weeks ahead and will be published in the same time scales as (k).
- l) A data set that contains MW Output Usable data aggregated by NGC Zone will be published. This will contain weekly data for the period 1 – 2 years ahead. This will be published on a six monthly basis.
 - l ii) A subsidiary data set will also be published, this is equal to the sum of all NGC Zone's MW Output Usable values by week for the period 1 – 2 years ahead and will be published in the same time scales as (l).
- m) A data set that contains MW Output Usable data aggregated by NGC Zone will be published. This will contain weekly data for the period 3 – 5 years ahead. This will be published on a six monthly basis.
 - m ii) A subsidiary data set will also be published, this is equal to the sum of all NGC Zone's MW Output Usable values by week for the period 3 – 5 years ahead and will be published in the same time scales as (m).

1.1.1.1

⁴ There are currently more than 30 active NGC Zones. The definitions of NGC Zones are not currently published.

The definitions of NGC Zones is also included within the Alternative Proposal, the published definitions will be updated if NGC make amendments to the Zone definitions.

5.4 Assessment of Alternative Proposal Against BSC Objectives

Three primary arguments were developed by the Group as to why the Alternative Proposal is preferable to the original Proposal. The following paragraphs explain these three arguments.

The majority of the Group believed that the alternative Proposal better facilitates BSC Objectives, as compared to the original Proposal, as it does not give rise to the conflict between BSC Objectives present in the original Proposal. Notably, because the Alternative seeks only to publish Output Usable data not Outage data the conflict between Objective (ii) associated with efficiency of system operation and Objective (iii) associated with efficient market operation did not arise.

The Group noted that part of the Proposer's rationale for seeking to publish the additional data sets defined in the original Proposal was to remove asymmetries in access to data present in the current arrangements. It is argued that publication of Output Usable data aggregated by NGC Zone directly removes the asymmetry associated with generators and non generators, discussed in section 5.2.1. The publication of zonal Output Useable data could potentially, depending on the definition of additional review of these zones prior to implementation of the modification will be necessary to remove zones which give explicit information about particular generating stations". This is therefore considered to be a matter for NGC and the Grid Code.

The majority of the Modification Group also noted that publishing Output Usable data aggregated by NGC Zone was merely extending the publication of an already available data set (albeit to only a subset of the market). Therefore secondary, potentially complex, issues associated with the publication of market sensitive information and the mechanisms and timing of such publication which might be governed under financial service legislation were unlikely to arise.

Some Group Members suggest that unless the definition of NGC Zones is published an asymmetry of access to market information would remain. If the Zone definitions are not published only generators within a Zone where there is a shortfall would be aware which Zone such shortfall is in. The Alternative Proposal therefore includes the publication of the definition of NGC Zones. NGC note that if zone definitions are published to maintain commercial confidence of individual generators current Zones may need revision to ensure that no Zone contains a single generating unit.

6 IMPACT ON BSC AND BSCCO DOCUMENTATION

6.1 BSC

Some limited changes will be required to the BSC to support the Alternative Modification Proposal developed by the Modification Group. The following sections of the BSC are considered to require amendment:

- Section Q 6 Submission Of Data By The Transmission Company
- Section V 4 Reporting By BSC Co
- Annex v-1 Tables of Reports
- Table X-2 Definitions

Each of these is discussed below, associated draft amendments to each of these sections are included in annex 1.

Similar changes could be expected to be required for the original Proposal although these have not been formally assessed as the Group.

Section Q 6 Submission Of Data By The Transmission Company

Section Q6 of the BSC defines the data, and timing, that must be passed by the Transmission Company to the BMRA and SAA. It is suggested that an additional subsection should be created defining the data that the Transmission Company passes to BSCCo. This new subsection would also define the timing that such data would need to be passed to BSCCo.

Section V 4 Reporting By BSC Co

Subsection 4.2 (Market Data) of Section V 4 details the 'market data' that BSCCo are required to publish on their website. It is suggested that this subsection could be updated to include the requirement on BSC Co to publish the additional genset Output Usable data. This new data would be defined in a new table, 'Table 8 BSCo Reporting' to be included in Annex V-1 and cross-referenced to the a new subsection under Section Q6, discussed above.

Annex V-1 Tables of Reports

Annex V-1 of the BSC currently includes 7 tables defining data that is reported by the BMRA, SAA, ECVA, CRA, CDCA, FAA and SVAA. It is suggested that a new table could be included defining data reported by BSCCo.

Table X-2 Definitions

The data at the centre of Modification Proposal P22 is not currently defined in the BSC. It is suggested that Output Usable should be defined, in section X – 2, by reference to the Grid Code.

6.2 Code Subsidiary Documents

No impact has been identified on Code Subsidiary Documents resulting from the Proposed Modification or Alternative Modification Proposal.

6.3 BSCCo Memorandum and Articles of Association

No impact has been identified on BSCCo Memorandum and Articles of Association as a consequence of the Proposed Modification or Alternative Modification Proposal.

7 IMPACT ON BSC SYSTEMS

The impact of Modification Proposal P22 and associated Alternative has been considered on all on all BSC systems including:

- Reporting
- Registration
- Contract Notification
- Credit Checking Systems
- Balancing Mechanism Activities
- Collection and Aggregation of Metered Data
- Supplier Volume Allocation
- Settlement
- Clearing, Invoicing and Payment

The Reporting System BMRS would be impacted, only if the BMRS was used to support the Modification Proposal or Alternative. However, as discussed elsewhere in this document, the Modification Group has opted to use the ELEXON website to support the Alternative Proposal. The impact on BMRS, if it were to be used, is summarised below. The full impact Assessment of the BMRA is included in Annex 2.

7.1 BMRS

The BMRA has conducted a high level impact assessment based on the Groups specification for the original and Alternative Modification Proposals, the results of which are summarised below.

In line with all central service provider high level impact assessments the cost identified below are indicative and subject to a 50% tolerance depending on the findings of an associated detailed level impact assessment.

The costs identified below have been determined on the basis of a stand alone project and could potentially, therefore, be reduced if economies of scale and scope were available by combining the development with one or more other projects.

Original Proposal

The anticipated cost of using the BMRS to support the implementation of the original proposal is £744,800 plus an operation and maintenance cost of £11,200 per month. The expected lead time would be 8 months.

Alternative Proposal

The anticipated cost of using the BMRS to support the implementation of the Alternative Proposal is £654,800 plus an operation and maintenance cost of £9,900 per month. The expected lead time would be 8 months.

8 IMPACT ON CORE INDUSTRY DOCUMENTS AND SUPPORTING ARRANGEMENTS

The impact of Modification Proposal P22 and associated Alternative has been considered on all core industry documents and supporting arrangements, including:

- Grid Code
- Master Connection and Use of System Agreement (MCUSA)
- Supplemental Agreements
- Ancillary Services Agreements (ASAs)
- Master Registration Agreement (MRA)
- Data Transfer Services Agreement (DTSA)
- British Grid Systems Agreement (BGSA)
- Use of Interconnector Agreement
- Pooling and Settlement Agreement (PSA)
- Settlement Agreement for Scotland (SAS)
- Distribution Codes
- Distribution Use of System Agreements (DUoSAs)
- Distribution Connection Agreements

Of the above list it is considered that only the Grid Code will require amendment to Support Modification Proposal P22 or Alternative, such amendments are discussed below.

8.1 Grid Code

NGC do not believe that the Alternative Proposal would require amendments to the Grid Code although if the original Proposal is adopted the wider circulation of genset specific is considered, by NGC, to require amendments to the Grid Code. Such amendments would need to relax confidentiality provisions to permit the release of data currently collected for planning purposes (Ref. OC2.4.2.1.(i)). Although the suggested changes to the Grid Code could be drafted 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. This process may also need to be followed for arrangements for the publication of Zone definitions. The lead-time for implementing such changes is likely to be of the order of 4 months.

It is noted that generators are usually included in the Grid Code consultation process, although the process is not limited to any particular parties and non-generators may respond to the consultation documents placed on the NGC website.

If related changes to the Grid Code are identified for the Alternative Proposal ELEXON, who have a representative on the Grid Code Review Panel, will look to ensure that consistency is maintained and that any changes to the Grid Code, designed to support this Modification Proposal, reflect the intentions of the Panel. Nevertheless such a change, if required, would act as an external dependency not within the control of the Panel.

9 IMPACT ON ELEXON

9.1 Impact of ELEXON Supporting Publication

Consistent with the Panels request an impact assessment was undertaken within ELEXON to determine the feasibility and costs of providing generator data on the ELEXON website. The impact assessment drew on resources from the main departments impacted by the changes within ELEXON. A number of options in terms of precisely what data sets might be published, ELEXON conclude that the impact of these options is broadly similar.

9.1.1 Impact

The ELEXON activities involved in developing, testing and implementing a solution for the publication of generator data can be categorised into the following three areas:

- a) receive the data from NGC;
- b) a mechanism to place this information on an appropriate part of the ELEXON website; and
- c) the design and provision of a revised website to accommodate the display of the information as outlined within the requirements.

Each of these aspects of the ELEXON impact is described below. ELEXON also wish to note that the ELEXON website was not originally developed with the daily publication of generator Output Usable data in mind. Similarly the current service levels for the ELEXON website did not have this use in mind.

a) Receipt of information from the Transmission Company

A process will be developed to place the data passed by NGC on an appropriate location in order that it can be uploaded to the ELEXON website. It is considered desirable that this process should be automated with minimal manual intervention.

b) Upload of information to the ELEXON website

The process of uploading information to the ELEXON website is currently undertaken as a manual file transfer by the ELEXON Website development team. This process occurs during office hours and therefore there would be greater cost impacts were this to be required as a round the clock operation. It should be noted that this activity could result in a lead time of up to 4 hours.

c) Website Development

This process involves the design, development and testing of a location on the ELEXON website such that it can accommodate the display of information in the format specified by the requirements.

9.1.2 Cost and Timescales

The cost of meeting the requirement to publish generator data on the ELEXON website in line with the requirement specification is estimated to be up to £52,000. It should be noted that it is anticipated that the resources used for this activity would be drawn from existing resources already included within the ELEXON operational budget.

A corresponding increase in the calls to the ELEXON helpdesk relating to the new data can be expected. This impact has not been factored into the above costs as it is difficult to quantify at this stage and would be dealt with by ELEXON operational resource.

The elapsed time involved in developing an ELEXON based solution is estimated at approximately 2 months.

10 IMPACT ON PARTIES AND PARTY AGENTS

This section identifies the impact, as assessed by the Modification Group, on BSC Parties and BSC Party Agents of the original Modification Proposal and Alternative Modification Proposal. It should be noted that the Modification Proposal or Alternative Modification Proposal have not been submitted to industry for impact assessment. The section concludes with the suggestion that the Panel may, at the present time, be constrained in its possible recommendations to the Authority in respect of the original Modification Proposal due to the potential impact on BSC Parties which, to date, have not been fully explored due to time constraints.

10.1 Parties

10.1.1 Original Proposal

As part of the impact assessment undertaken by NGC, as Transmission Company, they highlighted concerns associated with the publication of genset specific data that it currently receives as facsimiles. These are subsequently manually input by NGC into electronic systems. Such manual input of data is subject to error and NGC recommend in their impact assessment that if genset specific data is to be published then it should be transferred electronically from each generating company to NGC before it is forwarded for publication. NGC indicate that currently around half of the generators would be impacted if this solution was adopted.

Due to the timing of the Assessment procedure and impact assessment results it has not been possible, in the time available, to ask those generators that could potentially be affected by the NGC recommended approach for an assessment of the impact and costs that it might impose.

It should be noted that, in principle, the Panel could choose to adopt the original Proposal without adopting the NGC recommendation of requiring generators to submit genset specific data to NGC electronically. Although such an approach may give rise to questions associated with the impact assessment process.

10.1.2 Alternative Proposal

There is no imposed impact of Modification Proposal P22 on BSC Parties. However, there is a potential for a discretionary impact if Parties choose to develop IT systems and processes to take better advantage of the additional data reported. This impact is wholly within the control of each BSC Party and is therefore not considered further in this document. It is also of note that no consultation respondents highlighted impacts associated with the publication of data under Modification Proposal P22.

10.1.3 Conclusion

If the NGC recommendation, that genset specific data be submitted to them electronically by all generators, is accepted it may not be possible for the Panel, at this time, to recommend to the Authority that the original Proposal is adopted as the industry impact of this solution have not been fully explored.

10.2 Party Agents

No impact has been identified on Party Agent resulting from the original or Alternative Modification Proposal.

11 LEGAL ISSUES

At the 2 July Panel meeting the question as to whether the Panel has the authority to recommend that information, currently provided to NGC by generators under OC2 of the Grid Code, should be published under the BSC.

Legal advice was sort and this was that Section F 2.1.3 and 2.1.4 of the BSC sets out the grounds on which Modification Proposals can be refused. This Modification Proposal, P22, is not considered to be captured by these provisions. It is also worth noting that the BSC currently provides for the publication of data obtained from NGC. The Modification Proposal has therefore been progressed by the Modification Group on behalf on the Panel.

Other than the changes to the BSC and Grid Code the Alternative Modification Proposal is considered not to give rise to any issues associated with the statutory, regulatory and contractual framework within which the Code sits.

12 SUMMARY OF REPRESENTATIONS

In line with the 26 July 2001 Panel decisions relating to Modification Proposal P22 a further consultation exercise, over and above that which was undertaken during the Definition Phase, was undertaken during the Assessment Phase. A consultation paper agreed by the Modification Group and based on the issues identified in the Definition Report was published on the 3 August 2001.

This section of the report provides a summary of the 12 consultation responses received as a result of the 3rd August consultation paper. The complete consultation responses received can be found in Annex 4.

	Question	Response Summary	Modification Comment	Group
a	Do you think that removing the asymmetry of access to generator Output Useable data between generators and other BSC Parties would better facilitate the achievement of one or more Applicable BSC Objective?	8 respondents believed that publishing Output Usable data would more effectively achieve BSC objectives.	The Modification Group agreed with consultation responses and believed that publishing generator Output Useable data (aggregated to NGC zones) would better achieve BSC Objectives, notably objective (iii). Although not all Group Members could agree if such data was published at the genset level.	
b	Do you think that removing the asymmetry of access to generator Outage information between NGC and all other BSC Parties would better facilitate the achievement of one or more Applicable BSC Objective?	5 consultation respondents thought that the publication of generator Outage data would not better facilitate BSC objectives whilst 5 respondents thought that it would better facilitate BSC objectives.	The Modification Group were unable to form an agreed view as to whether the publication of generator Outage information would better facilitate BSC objectives or not, with some in favour and others against. Some group Members noted that NGC had, or should have,	

			Chinese walls in place to prevent any commercial advantage arising from its access to Outage data in its unique market position.
c	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?	4 respondents believed that publishing Output Useable data might impact the quality of data received by NGC, two of these respondents suggested that additional monitoring should be put in place to identify and such deterioration.	The Modification Group felt that if the publication of this data lead to reduced quality then existing licence and Grid Code provisions should encourage the necessary improvement.
d	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?	7 respondents believed that publishing generator Outage data could lead to a deterioration in the quality of data received by NGC, 2 of these respondents suggested that additional monitoring should be put in place to identify any such deterioration. 4 respondents said that they did not believe that publishing Outage data would lead to a deterioration in quality, 1 of these respondents indicated that existing Licence conditions on generators were sufficient to ensure data quality while another suggested that NGC would ensure future data quality.	The Modification Group felt that if the publication of this data lead to reduced quality then existing licence and Grid Code provisions should encourage the necessary improvement.
e	Do you consider it preferable to publish Output Useable data by: i) Genset, ii) NGC Zone, iii) BMRS Zone, iv) At the National Level	Responses are summarised by the following: 3 supported i) Genset 4 supported ii) NGC Zone 3 supported iii) BMRS Zone 1 supported iv) National	The Modification Group suggested that it was at least appropriate to publish Output Usable data at the National Level and possibly another level. The Group noted that publication at the 'genset' level was potentially commercially sensitive and that publication at an 'NGC Zone' level could lead to similar problems due to the nature of some zones. The Group also observed that there was no stability in NGC zones

			and that they could change at the discretion of NGC.
f	Do you believe that a distinction between types of generators, (e.g. baseload, peaking) should be made when publishing generator outage plans?	7 respondents said that they did not believe it was appropriate to make a distinction between different types or classes of generator when publishing Output Usable or Outage data.	The majority of the Modification Group supported this view whilst highlighting the difficulty of drawing up definitive and meaningful categories within which generators might be placed.
g	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 preference was expressed by consultation respondents regarding the method of publication, most respondents indicated that either the BMRS or the ELEXON web site would be acceptable. Some respondent indicated that the BMRS would be preferable on the grounds that other market information can be found there.	The Modification Group supported this view subject to costs.
h	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?	11 Respondents indicated that the data was more efficiently sourced from NGC. Only one respondent suggested that generators should send the data to ELEXON and NGC. The respondent suggested that ELEXON could then publish the data and monitor any differences in the data received by NGC and ELEXON.	The Modification Group supported this view and noted that the time to develop alternative mechanism and processes could be counter productive.

12.1 Consultation Conclusion

The Group notes that it is not the number of respondents supporting or opposing a particular aspect of a Modification Proposal that is important but the quality of argument presented in support of a particular view. Overall the Group do not believe that any new arguments have been presented in support of consultation responses that had not previously been explored by the Group.

13 SUMMARY OF TRANSMISSION COMPANY ANALYSIS

In order to implement the original Proposal or Alternative NGC would be required to make amendments to their IT systems. NGC as Transmission Company has therefore conducted an analysis of Modification Proposal and the Alternative Proposal based on the Groups specification, the results of are summarised below. A copy of the NGC analysis can be found in Annex 3.

Original Proposal

The anticipated cost of amending NGC systems to support the implementation of the original Proposal is £182,000.

NGC indicate that the original proposal is likely to give rise to a conflict between BSC Objective (ii) associated with the efficient economic operation of the Transmission system and Objective (iii) associated with promoting effective competition.

NGC state that they have concerns associated with the publication of genset specific data as it may give rise to a loss of accuracy of data received by NGC. Such loss of accuracy may limit NGC's access to the data they require to efficiently operate a co-ordinated Transmission System.

Alternative Proposal

The anticipated cost of amending NGC systems to support the implementation of the Alternative Proposal is £87,500.

NGC believe that Zonal Output Useable data would be useful to market participants.

Lead Time

The expected lead time would be 4 months for both the original and Alternative Proposal. NGC also recommend that due to existing work commitments they would prefer not to start work on this proposal until 1 December 2001. NGC also suggest that the Proposal or Alternative would require a corresponding amendment to the Grid Code, these would be expected to take of the order of 4 months and are detailed in section 8.1.