

## Responses from P103 Assessment Consultation

Consultation issued 20 November 2002

Representations were received from the following parties:

No	Company	File Number	No. BSC Parties Represented	No. Non-Parties Represented
1.	British Sugar	P103_ASS_001		1
2.	Alcan Primary Metal	P103_ASS_002		1
3.	British Energy	P103_ASS_003	3	
4.	LE Group	P103_ASS_004	7	
5.	Aquila Networks	P103_ASS_005	1	
6.	British Gas Trading	P103_ASS_006	5	
7.	SEEBOARD	P103_ASS_007	1	
8.	Slough Heat and Power	P103_ASS_008	2	2
9.	Scottish Power	P103_ASS_009	6	
10.	Scottish and Southern	P103_ASS_010	4	
11.	NGC	P103_ASS_011	1	
12.	Powergen	P103_ASS_012	15	
13.	Renewable Power Organisation	P103_AS_013		1

**P103\_ASS\_001 – British Sugar**

BSC Parties, Non Parties (including License Exempt Generators) are invited to provide their response on the questions below.

<b>Respondent:</b>	<i>Ian Calvert</i>		
<b>Responding on Behalf of</b>	<i>British Sugar / Associated British Foods</i>		
<b>Role of Respondent</b>	<i>Major Electricity Consumer and Licence Exempt Generator</i>		
	<b>Question</b>	<b>Response Yes/No</b>	<b>Rationale</b>
Q1	<p><b><u>Applicable BSC Objectives</u></b></p> <p>Do you believe that the following features, as described within Modification Proposal P103 and the accompanying Requirements Specification, would better facilitate the achievement of the applicable BSC Objectives:</p>		
	<p><b>Requirement 1</b> Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable</p> <p><b>Approach 1</b></p>	Yes	If the data is inaccurate (for example last weeks £9999 SBP) it is of limited use when making commercial decisions. We are grateful for Elexon's spreadsheet but are concerned about its status for use by us in important electricity contracts.
	<p><b>Approach 2</b></p>		This appears to be overkill and will be used extremely infrequently. It would probably not be cost effective (inefficient in BSC speak).

	<b>Requirement 2</b>	A) Extended Data Retention	Yes	Given the ever decreasing costs of data storage, there is probably little justification for deleting information. A central data base will represent least cost to the industry and prevent the need for all parties, NGC and Elexon to maintain identical databases.
		B) Data Archiving and Retrieval	Yes	See above. Archiving is an IT issue; what is required by the industry is cost effective data storage.  This is of limited use without appropriate access tools.
	<b>Requirement 3</b>	Additional Data Querying Facilities	Yes	The current data querying facility is very poor to the extent that it is of very little use to anyone using it commercially. It would not be difficult to improve it by considering how people are likely to use it.  The current facilities only pay lipservice to the concept of an open market since they are cumbersome.
	<b>Requirement 4</b>	Additional Data Requirements	Yes	This furthers NETA aims for a competitive market.

	<b>Overall package of Requirements 1 – 4</b>		Yes	In priority order :1,3,2,4. There can be little justification for having such unuseable information – it is a barrier to small players and potential new entrants. Why is this information available at all if it cannot be used commercially? The current situation looks dangerously like lipservice to the requirement for an open market whereby in practice you need to be a large player with sophisticated IT system (which are all duplicated to the detriment of the industry) in order to participate.
Q2	<b><u>Approach to Implementation of Requirement 1</u></b> Which approach (Approach 1 or 2) identified to address Requirement 1 in the attached Requirement Specification, do you believe would better facilitate the achievement of the Applicable BSC Objectives?		Response 1 or 2	Approach 1 is clearly more efficient.
Q3	<b><u>Take up of P103</u></b> Do you believe that if the enhancements to the BMRS as specified in the attached Requirements Specification were to be implemented your organisation would make use of them?		Response	Rationale
	<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable  (Approach 1 or 2)	Yes	We want an authoritative price reporting system which operates quickly, which we can therefore use in our contracts.

	<b>Requirement 2</b>	A) Extended Data Retention	Yes	We would require data to be there for as long as its is relevant for our contract settlements. It is unjust and unnecessary to expect lots of small players to all archive all the data just so they can be on an equal footing with large power companies.
		B) Data Archiving and Retrieval	Yes	There is no point in retaining data if it cannot be accessed, but this should be considered pragmatically in the light of likely usage.
	<b>Requirement 3</b>	Additional Data Querying Facilities	Yes	It would take very little imagination to improve the current system which was developed very late on in NETA after complaints by small players. As it is now over a year into NETA the job should be finished properly and the system made useful. Note my comment above regarding why we have a system with such limited utility.
	<b>Requirement 4</b>	Additional Data Requirements	Yes	It is a nonsense that information is "confidential" if it is available to one's competitors, but not non BSC parties. See BSC objective c.
	<b>Overall package of Requirements 1 – 4</b>		Yes	We would be able to participate more in the NETA market, thereby contributing to competition in generation and supply.
<b>Q4</b>	<b><u>Cost Recovery mechanism</u></b> Do you believe the development cost for P103 should be spread across all BSC Parties? If you believe there are elements (Requirements 1 – 4) that should be charged for separately please		Yes	This is simply addressing what is a manifold defect in the original NETA system. It was never the intent to produce an unuseable system – this should be sorted. We were told that the more flexible governance would enable problems like this to be

	specify this in your answer.							sorted quickly. It is time to demonstrate this now.
Q5	<p><b><u>Development Costs</u></b></p> <p>In order to inform the discussions of the SSMG, how much value would you put on having these requirements implemented and hence would be prepared to fund as a central cost. (A Detailed Level Impact Assessment (DLIA) by the BSC Agent is being undertaken in parallel with this consultation) – The results of the DLIA will be considered along with the answers to this consultation at the same meeting of the SSMG.</p>	<p>Please fill in your answers in the table below. Please place an asterisk to indicate a level of development costs above which your support for the modification would be withdrawn (or if not applicable that you would support the modification if development costs exceeded £2.5M)</p> <p>This is irrelevant and any attempt to maintain the barriers to entry which are represented by the poor state of the BMRS functionality should be questioned as anti-competitive.</p>						
		£0 – I do not support this requirement	£1 – 100k	£100k to £250k	£250k to £500k	£500k to £1M	£1M to 2.5M	I support this modification proposal if central costs exceed £2.5M
<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable							
	<b>Approach 1</b>							
	<b>Approach 2</b>							
<b>Requirement 2</b>	A) Extended Data Retention							
	B) Data Archiving and Retrieval							
<b>Requirement 3</b>	Additional Data Querying Facilities							

<b>Requirement 4</b>	Additional Data Requirements							
Overall Package (Requirements 1-4)								
				<b>Response</b>	<b>Rationale</b>			
<b>Q6</b>	<p><b><u>Data Items to be updated in line with Settlement Runs.</u></b></p> <p>Do you believe the list of items to be updated in line with Settlement and Reconciliation Runs as outlined within section 2.2.2 of the attached P103 Requirements Specification is appropriate. If you have any other data items you believe should be considered please identify these in your response.</p>			Yes	<p>SO142 data should be made accessible, and (learning the lesson from the BMRS issue) in a demonstrable useable way.</p> <p>This should not be very costly.</p>			
				<b>Response</b>	<b>Rationale</b>			
<b>Q7</b>	<p><b><u>Data Retention</u></b></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for data to be retained and available on the BMRS prior to its archiving. What do you believe is an appropriate data retention period for data to be retained on the BMRS, please specify this in months (Please note that there is an interaction between P103 and P107 in respect of data retention).</p>			60 months	<p>Given that no data will have been deleted yet, this is just a matter of buying some storage medis; as I indicated above, this being done centrally is clearly the lowest cost system for the industry as it would obviate the need for every party to keep it.</p>			
<b>Q8</b>	<p><b><u>Data Archiving</u></b></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for data to be retained once it has been archived and hence available for subsequent retrieval on request. How many years do you believe this data should be retained once it has been archived? (Please note that</p>			_5_ Years	<p>This is purely an IT question related to the speed of querying tools and computers. All we require is a useable system. We cannot comment on the tradeoff of speed versus storage except to say the BMRS must not be noticeably slower than it is now.</p>			

	there is an interaction between P103 and P107 in respect of data retention).		
Q9	<p><b><u>Additional Data Querying Facilities</u></b></p> <p>With respect to Requirement 3, "Additional Data Querying Facilities", do you think it is appropriate to create a separate central data repository to contain the data that can be queried using such tools as Microsoft® Access® / Structured Query Language (SQL)?</p>	Yes	A move to an open database would be welcome.
		Response (Please answer "YES" or "NO")	
Q10	<p><b><u>Commercial Service Providers</u></b></p> <p>The Modification Group Terms of References included a request to determine whether the services outlined within P103 are currently provided as a commercial service. In order to address this issue, respondents are asked to identify if they are currently aware of any organisation currently providing services or tools described in P103 on a commercial basis.</p>	Yes we are which demonstrates the need for the changes.	These changes are required for the market to be accessible beyond the BSC "club".
Q11	<p><b><u>Confidentiality of Data</u></b></p> <p>As part of the terms of reference for Modification Proposal P103, the Panel asked the group to consider how confidential data should be treated. Do you believe data such as that contained within the Settlement Report SAA-I014 variant 2, (SO142) should be made publicly available on the BMRs or do you believe this data should be kept confidential to BSC Parties.</p>	Please specify your answer as "PUBLIC" / "CONFIDENTIAL"	Rationale

		<p><b>Public</b></p>	<p>It is currently bizarre that LEGs have to ask their counter parties to what extent they can buy their output, when this information is available to the parties competitors.</p> <p>By definition if SO142 data is available to all parties it is not confidential.</p> <p>Pseudo confidentiality is a barrier to an efficient competitive market, smacks of a cartel mentality and increases costs to end consumers.</p>
<p><b>Q12</b></p>	<p><b><u>Other Considerations</u></b></p> <p><b>Do you have any other comments you wish to make in relation to P103?</b></p>	<p><b>Please state your views.</b></p> <p>This is a welcome, but belated move to improve market access and visibility for small players. It has only been this late in being proposed because non parties are not allowed to raise mods.</p>	

**P103\_ASS\_002 – Alcan Primary Metal**

BSC Parties, Non Parties (including License Exempt Generators) are invited to provide their response on the questions below.

<b>Respondent:</b>	<i>Name:</i> <b>Bob Nicholson, Alcan Primary Metals – Europe Ltd</b>		
<b>Responding on Behalf of</b>	<i>Please list all Parties/non-Parties responding on behalf of (including the respondent company if relevant).</i>  <b>Alcan Primary Metals – Europe Ltd</b>		
<b>Role of Respondent</b>	<i>(BSC Party/ Licensed Exemptable Generator / Other (Please specify))</i>  <b>Licensed Exemptable Generator</b>		
	<b>Question</b>	<b>Response Yes/No</b>	<b>Rationale</b>
<b>Q1</b>	<b><u>Applicable BSC Objectives</u></b>  Do you believe that the following features, as described within Modification Proposal P103 and the accompanying Requirements Specification, would better facilitate the achievement of the applicable BSC Objectives:		
	<b>Requirement 1</b> Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable  <b>Approach 1</b>	<b>Yes</b>	At present this data may be inaccurate – this source of data may not be relied upon so is of limited value. The existence of Elexon’s “Best View Prices” spreadsheet is testament to this – we note that there is no obligation on Elexon to publish this.
	<b>Approach 2</b>	<b>No</b>	The cost is likely to be too great for limited benefit over approach 1.

	<b>Requirement 2</b>	A) Extended Data Retention	<b>Yes</b>	Yes – for example, any potential market entrant would require access to a reasonable market history.
		B) Data Archiving and Retrieval	<b>Yes</b>	Ditto
	<b>Requirement 3</b>	Additional Data Querying Facilities	<b>Yes</b>	Yes – existing arrangements are unwieldy and smaller market participants are disadvantaged
	<b>Requirement 4</b>	Additional Data Requirements	<b>Yes</b>	<p>The statement that data that is currently restricted to BSC Parties would remain available only to BSC Parties <b>is in contradiction with the modification as proposed</b>. The intent behind the modification is to provide public access to all data without restriction.</p> <p>It is essential that the data items should <u>not</u> be kept “confidential” i.e. available just to the 150+ BSC parties. This can hardly be construed as confidentiality, so further restriction serves no useful purpose.</p>
	<b>Overall package of Requirements 1 – 4</b>		<b>Yes</b>	Generally, any change that adds to the transparency of the arrangements can increase competition. The existing complexity and inaccessibility of the BMRS prevents Parties and non-Parties alike from accessing data.
Q2	<b><u>Approach to Implementation of Requirement 1</u></b> Which approach (Approach 1 or 2) identified to address Requirement 1 in the attached Requirement Specification, do you believe would better facilitate the achievement of the Applicable		<b>Response 1</b>	Availability of older (out-of-date) data will add to cost and may introduce confusion

	BSC Objectives?			
Q3	<b><u>Take up of P103</u></b> Do you believe that if the enhancements to the BMRS as specified in the attached Requirements Specification were to be implemented your organisation would make use of them?		Response	Rationale
	<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable  (Approach 1 or 2)	Yes (1)	
	<b>Requirement 2</b>	A) Extended Data Retention	Yes	
		B) Data Archiving and Retrieval	Yes	
	<b>Requirement 3</b>	Additional Data Querying Facilities	Yes	
	<b>Requirement 4</b>	Additional Data Requirements	Yes	
	<b>Overall package of Requirements 1 – 4</b>		Yes	
Q4	<b><u>Cost Recovery mechanism</u></b> Do you believe the development cost for P103 should be spread across all BSC Parties? If you believe there are elements (Requirements 1 – 4) that should be charged for separately please specify this in your answer.		Yes	In determining the appropriate recovery of the cost of BSC Modifications that encompass LEGs and other smaller organisations, due account should be taken of the proportionality of those costs for those organisations. It is not appropriate for these organisations to bear the entirety of costs to modify the BSC where such changes are to address inequities, inefficiencies or omissions in the original development of the BSC. Such costs can act as a barrier to entry and participation and as such run counter to Objective C of the BSC, to promote

									competition.
<b>Q5</b>	<b><u>Development Costs</u></b> <b>In order to inform the discussions of the SSMG, how much value would you put on having these requirements implemented and hence would be prepared to fund as a central cost. (A Detailed Level Impact Assessment (DLIA) by the BSC Agent is being undertaken in parallel with this consultation) – The results of the DLIA will be considered along with the answers to this consultation at the same meeting of the SSMG.</b>			<i>Please fill in your answers in the table below. Please place an asterisk to indicate a level of development costs above which your support for the modification would be withdrawn (or if not applicable that you would support the modification if development costs exceeded £2.5M)</i>					
		£0 – I do not support this requirement	£1 – 100k	£100k to £250k	£250k to £500k	£500k to £1M	£1M to 2.5M	I support this modification proposal if central costs exceed £2.5M	
<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable								
	<b>Approach 1</b>								
	<b>Approach 2</b>								
<b>Requirement 2</b>	A) Extended Data Retention								
	B) Data Archiving and Retrieval								
<b>Requirement 3</b>	Additional Data Querying Facilities								

<b>Requirement 4</b>	Additional Data Requirements							
Overall Package (Requirements 1-4)								
		<b>Response</b>	<b>Rationale</b>					
<b>Q6</b>	<p><b><u>Data Items to be updated in line with Settlement Runs.</u></b></p> <p>Do you believe the list of items to be updated in line with Settlement and Reconciliation Runs as outlined within section 2.2.2 of the attached P103 Requirements Specification is appropriate. If you have any other data items you believe should be considered please identify these in your response.</p>	Yes – plus:	<p>The term “metered output” should be taken to mean “metered volumes”, for producing and consuming BM Units alike. This will allow LEGs to review the ability of different potential purchasers to absorb their embedded benefits. Any forced aggregation to GSP Group in the interests of “confidentiality” would be costly and unnecessary – it has never been demonstrated that (for example) directly connected consumers have any objection to release of data for their BM Unit (especially given that FPN data is already publicly available by BMU).</p> <p>The entire set of S0142 data should be made available to anyone, on request, in the cheapest possible way – for example, by allowing non-BSC Parties access to download the S0142 report from the low-grade service.</p>					
		<b>Response</b>	<b>Rationale</b>					
<b>Q7</b>	<p><b><u>Data Retention</u></b></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for data to be retained and available on the BMRS prior to its archiving. What do you believe is an appropriate data retention period for data to be</p>	[36 months]						

	<p>retained on the BMRS, please specify this in months (Please note that there is an interaction between P103 and P107 in respect of data retention).</p>		
Q8	<p><b><u>Data Archiving</u></b></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for data to be retained once it has been archived and hence available for subsequent retrieval on request. How many years do you believe this data should be retained once it has been archived? (Please note that there is an interaction between P103 and P107 in respect of data retention).</p>	[5 Years]	
Q9	<p><b><u>Additional Data Querying Facilities</u></b></p> <p>With respect to Requirement 3, "Additional Data Querying Facilities", do you think it is appropriate to create a separate central data repository to contain the data that can be queried using such tools as Microsoft® Access® / Structured Query Language (SQL)?</p>	Yes	The existing service is extremely unwieldy and difficult to use without large-scale and dedicated facilities.
		Response (Please answer "YES" or "NO")	

Q10	<p><b><u>Commercial Service Providers</u></b></p> <p>The Modification Group Terms of References included a request to determine whether the services outlined within P103 are currently provided as a commercial service. In order to address this issue, respondents are asked to identify if they are currently aware of any organisation currently providing services or tools described in P103 on a commercial basis.</p>	<p>[part answer]</p> <p>ILEX Energy Consulting conducts ad-hoc analysis based on data on the existing BMRS and the S0142 reports (the latter for BSC Parties only)</p>	
Q11	<p><b><u>Confidentiality of Data</u></b></p> <p>As part of the terms of reference for Modification Proposal P103, the Panel asked the group to consider how confidential data should be treated. Do you believe data such as that contained within the Settlement Report SAA-I014 variant 2, (S0142) should be made publicly available on the BMRS or do you believe this data should be kept confidential to BSC Parties.</p>	<p>Please specify your answer as "PUBLIC" / "CONFIDENTIAL"</p>	<p>Rationale</p>

		<b>Public</b>	<p>The removal of the existing, misplaced confidentiality restrictions are an essential feature of the modification proposal, and to retain this confidentiality would defeat part of the object.</p> <p>Access to data is currently more restrictive than under the Pool, for no good reason – for example, non-BSC Parties have no access to data on transmission losses or metered volumes that were in the public domain under the Pool.</p> <p>This works against the interests of competition on several levels. It serves as a barrier to entry, as potential entrants (and their advisors) have no access to essential data. It works against the interests of competition, as most LEGs have no means of seeing the volumes taken by suppliers in their GSP Group (when tendering for sales) or independently verifying the settlement of their offtake contracts with suppliers (for example, some of these have prices that vary depending on whether the supplier is long or short in an individual half-hour, information available to all BSC Parties but not to non-parties).</p> <p>Given that all BSC Parties have access to all S0142 data there can be no justification for confidentiality restrictions placed on non-BSC Parties, particularly given the diverse ownership and wider commercial interests of BSC Parties and their parent companies. There is no real confidentiality in data that is already available to commercial rivals.</p> <p>This unnecessary maintenance of confidentiality is a key cost-driver – relaxing these unnecessary restrictions would permit low-cost and simple solutions to the problem.</p> <p>Any alternative to the modification should seek a pragmatic and low-cost solution to these issues – see below.</p>
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Q12	<b><u>Other Considerations</u></b>  <b>Do you have any other comments you wish to make in relation to P103?</b>	<b>Please state your views.</b>  Having read the requirements specification, it appears that the modification is in danger of sinking under its own complexity.  A cheaper and simpler solution to many of the issues would be to provide public access to the S0142 report, and to permit other agencies to sell the services that are outlined as part of the modification.
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**P103\_ASS\_003 – British Energy**

To: Modification Secretary

From: Rachel Ace

Date: 3 December

British Energy does not support this modification proposal. We do not believe there is a justification for the significant extension of the BMRA facilities which provide the market with information on the balancing mechanism. Should individual parties believe they need / want further more detailed information then they are free to develop their own 'in-house' capability or purchase the service on a commercial basis from a suitable third party at a commercial rate. It does not in our view better facilitate BSC objective (d) for the central systems to attempt to duplicate these facilities and impose additional costs on all BSC parties for the benefit of a few.

We accept that there may be a case for a review of the BMRA facilities but do not believe or support such a radical and potentially expensive systems extension.

Regards

Rachel Ace

On behalf of

British Energy Power and Energy Trading

British Energy Generation

Eggborough Power Ltd

**P103\_ASS\_004 – LE Group**

BSC Parties, Non Parties (including License Exempt Generators) are invited to provide their response on the questions below.

<b>Respondent:</b>	Liz Anderson		
<b>Responding on Behalf of</b>	LE Group (EPN Distribution Ltd, London Electricity plc, London Electricity Group plc, Jade Power Generation Ltd, London Power Networks plc, Sutton Bridge Power, West Burton Ltd)		
<b>Role of Respondent</b>	BSC Party		
	<b>Question</b>	<b>Response Yes/No</b>	<b>Rationale</b>
<b>Q1</b>	<b><u>Applicable BSC Objectives</u></b> <b>Do you believe that the following features, as described within Modification Proposal P103 and the accompanying Requirements Specification, would better facilitate the achievement of the applicable BSC Objectives:</b>		

	<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable  <b>Approach 1</b>	No	SO142 data is currently available to all BSC parties and updated imbalance prices are published on Elexon's website. Updating data on the BMRS in line with the settlement and reconciliation timetable does not significantly change the data available to BSC Parties. Providing updated data would only better promote effective competition in the generation and supply of electricity for LEG's who are non-BSC parties (and can not receive SO142) if it could be proved that there is a material change from the indicative data published to that available from each settlement run. We have seen no evidence presented that suggests there is a material change from the indicative data to later settlement runs (best view prices are already available on Elexon's web site). Additionally there is the issue of how this proposed change should be paid for bearing in mind that the main beneficiaries would appear to be non-BSC parties (see further comments under cost recovery).
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		<b>Approach 2</b>	No	<p>Our comments for approach 2 are as above with the additional point that approach 2 appears to over engineer the retention of data by holding the same data item for all settlement runs. This appears to be inefficient as a party could scrape the data after each settlement run update in approach 1 from the P103 system and store it for its own purposes should it require that capability. It therefore appears to not meet objective (d) efficiency in the implementation and administration of the balancing and settlement arrangements and not meet objective (c) promote effective competition in the generation and supply of electricity.</p>
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	<b>Requirement 2</b>	A) Extended Data Retention	No  (Yes if requirement 1 is implemented)	<p>There is no reason for data from the current system to be reported for greater than 12 months as should a Party wish to retain this data for analytical purposes they can scrape the data from the current website and make their own storage requirements. This requirement does not therefore appear to meet objective (d) efficiency in the implementation and administration of the balancing and settlement arrangements and not meet objective (c) promote effective competition in the generation and supply of electricity.</p> <p>If requirement 1 was implemented then it would logically follow that data should be retained for greater than 12 months after the settlement date to allow later settlement run information to be posted and available for access for a period of time.</p>
		B) Data Archiving and Retrieval	No	<p>If parties wish to store data for x years after then they should scrape the data from the P103 system. Data retention requirements for Trading Disputes are covered within the BSC and other code subsidiary documents and data is retained as appropriate elsewhere. This requirement does not therefore appear to meet objective (d) efficiency in the implementation and administration of the balancing and settlement arrangements and not meet objective (c) promote effective competition in the generation and supply of electricity.</p>

	<b>Requirement 3</b>	Additional Data Querying Facilities	No	<p>The proposer is guessing what analysis will be required in the future. What happens if a party decides they want to analyse the data in a different way which is not possible given the proposed configuration of this system in say 2 years time? Do they raise another modification to enable them to have the BMRS changed so that they can do this analysis? Each party has unique analysis requirements and the only efficient way to enable them to conduct the analysis that is relevant to them is to give them raw data feeds and let them build their own analytical tools. This requirement does not therefore appear to meet objective (d) efficiency in the implementation and administration of the balancing and settlement arrangements and not meet objective (c) promote effective competition in the generation and supply of electricity.</p>
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	<b>Requirement 4</b>	Additional Data Requirements	No	<p>Posting data on the BMRS that is already available to all BSC parties through the SO142 data feed does not meet objective (d) efficiency in the implementation and administration of the balancing and settlement arrangements and does not meet objective (c) promote effective competition in the generation and supply of electricity.</p> <p>Requesting tag identifiers for accepted trades that are arbitrage, CADL etc merely allows parties to check that the imbalance cashout price calculations are being correctly calculated. Whilst double-checking Elexon's calculations is a "nice to have" we are satisfied with Elexon's own internal processes. We do not believe that this additional information is of significant value and hence providing it on the BMRS does not meet objective (d) efficiency in the implementation and administration of the balancing and settlement arrangements and does not meet objective (c) promote effective competition in the generation and supply of electricity.</p>
	<b>Overall package of Requirements 1 – 4</b>		No	See answers to individual requirements above.
<b>Q2</b>	<b><u>Approach to Implementation of Requirement 1</u></b> Which approach (Approach 1 or 2) identified to address Requirement 1 in the attached Requirement Specification, do you believe would better facilitate the achievement of the Applicable BSC Objectives?		Response  <b>1</b>	If requirement 1 is implemented then approach 1 is the more efficient mechanism of the two suggested approaches. There is little value in retaining data from previous settlement runs once it has been superseded and in any case any party would be able to scrape and store data from the system prior to each update negating the need for the system itself

			to retain earlier settlement run data.
<b>Q3</b>	<b><u>Take up of P103</u></b> Do you believe that if the enhancements to the BMRS as specified in the attached Requirements Specification were to be implemented your organisation would make use of them?	<b>Response</b> Yes / No	<b>Rationale</b>
	<b>Requirement 1</b> Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable (Approach 1 or 2)	NO	As encouraged to by the Authority during the run-up to NETA, we have constructed our own data warehousing and analytical toolset to analyse data flows provided by Elexon.
	<b>Requirement 2</b> A) Extended Data Retention	NO	As above
	B) Data Archiving and Retrieval	NO	As above
	<b>Requirement 3</b> Additional Data Querying Facilities	NO	As above
	<b>Requirement 4</b> Additional Data Requirements	NO	As above
	<b>Overall package of Requirements 1 – 4</b>	NO	As above
<b>Q4</b>	<b><u>Cost Recovery mechanism</u></b> Do you believe the development cost for P103 should be spread across all BSC Parties? If you believe there are elements (Requirements 1 – 4) that should be charged for separately please specify this in your answer.	NO	At the start of NETA parties were encouraged to build their own capability to analyse data flows provided by Elexon. As such a number of parties have already incurred considerable costs to develop their own analytical capability. The costs of P103 should be incurred by those who use the service and benefit from it. Those parties that do not use the service (either because they have already built their own system or because they do not wish to use the P103 solution) should not be forced to subsidise

									those parties that do.
<b>Q5</b>	<b><u>Development Costs</u></b>  In order to inform the discussions of the SSMG, how much value would you put on having these requirements implemented and hence would be prepared to fund as a central cost. (A Detailed Level Impact Assessment (DLIA) by the BSC Agent is being undertaken in parallel with this consultation) – The results of the DLIA will be considered along with the answers to this consultation at the same meeting of the SSMG.	Please fill in your answers in the table below. Please place an asterisk to indicate a level of development costs above which your support for the modification would be withdrawn (or if not applicable that you would support the modification if development costs exceeded £2.5M)							
		£0 – I do not support this requirement	£1 – 100k	£100k to £250k	£250k to £500k	£500k to £1M	£1M to 2.5M	I support this modification proposal if central costs exceed £2.5M	
<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable	*							
	<b>Approach 1</b>								
	<b>Approach 2</b>	*							
<b>Requirement 2</b>	A) Extended Data Retention	*							
	B) Data Archiving and Retrieval	*							
<b>Requirement 3</b>	Additional Data Querying Facilities	*							
<b>Requirement 4</b>	Additional Data Requirements	*							

Overall Package (Requirements 1-4)		*					
			<b>Response</b>	<b>Rationale</b>			
<b>Q6</b>	<p><b><u>Data Items to be updated in line with Settlement Runs.</u></b></p> <p>Do you believe the list of items to be updated in line with Settlement and Reconciliation Runs as outlined within section 2.2.2 of the attached P103 Requirements Specification is appropriate. If you have any other data items you believe should be considered please identify these in your response.</p>		Yes	If this modification is implemented it would seem sensible that those data items listed are updated			
			<b>Response</b>	<b>Rationale</b>			
<b>Q7</b>	<p><b><u>Data Retention</u></b></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for data to be retained and available on the BMRS prior to its archiving. What do you believe is an appropriate data retention period for data to be retained on the BMRS, please specify this in months (Please note that there is an interaction between P103 and P107 in respect of data retention).</p>		12 months after a data item is published on the BMRS (i.e. if RF data is published it is held for just 12 months)	Data should be retained for a sufficiently long period to allow parties to remove it for their own purposes and no more. 12 months should be more than adequate for a party to scrape data from the website.			
<b>Q8</b>	<p><b><u>Data Archiving</u></b></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for data to be retained once it has been archived and hence available for subsequent retrieval on request. How many years do you believe this data</p>		0 Years	We do not believe that a data archiving service should be provided. Parties should make their own arrangements to scrape the data from the website and store it for their own purposes.			

	should be retained once it has been archived? (Please note that there is an interaction between P103 and P107 in respect of data retention).		
Q9	<p><b><u>Additional Data Querying Facilities</u></b></p> <p>With respect to Requirement 3, "Additional Data Querying Facilities", do you think it is appropriate to create a separate central data repository to contain the data that can be queried using such tools as Microsoft® Access® / Structured Query Language (SQL)?</p>	Yes	If requirement 3 is implemented it would make sense to store this data separately to prevent reduced performance of the current BMRS.
		Response (Please answer "YES" or "NO")	
Q10	<p><b><u>Commercial Service Providers</u></b></p> <p>The Modification Group Terms of References included a request to determine whether the services outlined within P103 are currently provided as a commercial service. In order to address this issue, respondents are asked to identify if they are currently aware of any organisation currently providing services or tools described in P103 on a commercial basis.</p>	YES	
Q11	<p><b><u>Confidentiality of Data</u></b></p> <p>As part of the terms of reference for Modification Proposal P103, the Panel asked the group to consider how confidential data should be treated. Do you believe data such as that contained within the Settlement Report SAA-I014 variant 2, (SO142) should be made publicly available on the BMRs or do you believe this data should be kept confidential to BSC Parties.</p>	Please specify your answer as "PUBLIC" / "CONFIDENTIAL"	Rationale

		CONFIDENTIAL	This data should be kept confidential to those parties who contribute to the cost of its production and distribution (e.g. BSC parties and those enabled by, for example P102, to receive it).
Q12	<p><b><u>Other Considerations</u></b></p> <p>Do you have any other comments you wish to make in relation to P103?</p>	Please state your views.	

**P103\_ASS\_005 – Aquila Networks**

Please find that Aquila Networks Plc response to P103 Assessment Consultation is 'No Comment'.

regards  
Rachael Gardener

Deregulation Control Group &  
Distribution Support Office  
AQUILA NETWORKS

**P103\_ASS\_006 – British Gas Trading**

BSC Parties, Non Parties (including License Exempt Generators) are invited to provide their response on the questions below.

<b>Respondent:</b>	Mark Manley		
<b>Responding on Behalf of</b>	British Gas Trading, Centrica KL Ltd, Centrica PB Ltd, Regional Power Generators Ltd, Accord Energy Ltd		
<b>Role of Respondent</b>	BSC Party/Supplier/Generator/Trader		
	<b>Question</b>	<b>Response Yes/No</b>	<b>Rationale</b>
<b>Q1</b>	<p><b><u>Applicable BSC Objectives</u></b></p> <p>Do you believe that the following features, as described within Modification Proposal P103 and the accompanying Requirements Specification, would better facilitate the achievement of the applicable BSC Objectives:</p>		
	<p><b>Requirement 1</b> Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable</p> <p><b>Approach 1</b></p>	No	The data provided on the BMRA is indicative and is provided to allow for a near real time view of data. This data evolves through the Settlement Run process and this updated information is provided via settlement reports. This data being updated and replicated on the BMRS does not better facilitate the achievement of the applicable BSC Objectives. If Participants want this service they should develop their own systems to extract and update data as required.
	<b>Approach 2</b>	No	As above

	<b>Requirement 2</b>	A) Extended Data Retention	No	The existing data retention period for the BMRS is 12 months we do not believe that extending the retention period will better facilitate any of the applicable BSC Objectives.
		B) Data Archiving and Retrieval	No	As above
	<b>Requirement 3</b>	Additional Data Querying Facilities	No	If the issue had been raised in the run up to of Go-Live then additional Data Querying Facilities on the BMRS would have provided added benefits. Many BSC Parties have since developed systems and as a consequence incurred costs to allow for data interrogation. We believe it would be unfair to ask BSC Parties to contribute again to fund this additional functionality on the BMRS.
	<b>Requirement 4</b>	Additional Data Requirements	No	
	<b>Overall package of Requirements 1 – 4</b>		No	
Q2	<b><u>Approach to Implementation of Requirement 1</u></b> Which approach (Approach 1 or 2) identified to address Requirement 1 in the attached Requirement Specification, do you believe would better facilitate the achievement of the Applicable BSC Objectives?		Response  1 or 2  Neither	We do not believe that either Approach 1 or 2 would better facilitate the achievement of the Applicable BSC Objectives.
Q3	<b><u>Take up of P103</u></b> Do you believe that if the enhancements to the BMRS as specified in the attached Requirements Specification were to be implemented your organisation would make use of them?		Response Yes / No	

	<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable (Approach 1 or 2)	No	We utilise the output data that is produced by the settlement process. Therefore replication of this data on the BMRS does not provide any value to us. Additionally the data on BMRS is indicative data and not actual settlement data.
	<b>Requirement 2</b>	A) Extended Data Retention	No	The settlement process provides data through the lifetime of the reconciliation process, including any data resulting from a Post Final Settlement Run. Therefore we would not utilise the data that was available on the BMRS.
		B) Data Archiving and Retrieval	No	As above
	<b>Requirement 3</b>	Additional Data Querying Facilities	No	We would not use the added functionality proposed by this Modification.
	<b>Requirement 4</b>	Additional Data Requirements	No	We would not make use of the additional data requirements produced.
	<b>Overall package of Requirements 1 – 4</b>		No	
Q4	<b><u>Cost Recovery mechanism</u></b> Do you believe the development cost for P103 should be spread across all BSC Parties? If you believe there are elements (Requirements 1 – 4) that should be charged for separately please specify this in your answer.		No	The majority of BSC Parties have separately funded projects to deliver the functionality proposed by this Modification Proposal. We perceive this Modification to be a cross subsidy to other elements of the market. We believe if such functionality were introduced into the BSC all development and maintenance costs should be paid for only by those who use the service.

Q5	<p><b>Development Costs</b></p> <p>In order to inform the discussions of the SSMG, how much value would you put on having these requirements implemented and hence would be prepared to fund as a central cost. (A Detailed Level Impact Assessment (DLIA) by the BSC Agent is being undertaken in parallel with this consultation) – The results of the DLIA will be considered along with the answers to this consultation at the same meeting of the SSMG.</p>		<p>Please fill in your answers in the table below. Please place an asterisk to indicate a level of development costs above which your support for the modification would be withdrawn (or if not applicable that you would support the modification if development costs exceeded £2.5M)</p>					
		£0 – I do not support this requirement	£1 – 100k	£100k to £250k	£250k to £500k	£500k to £1M	£1M to 2.5M	I support this modification proposal if central costs exceed £2.5M
<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable	*						
	<b>Approach 1</b>							
	<b>Approach 2</b>	*						
<b>Requirement 2</b>	A) Extended Data Retention	*						
	B) Data Archiving and Retrieval	*						
<b>Requirement 3</b>	Additional Data Querying Facilities	*						
<b>Requirement 4</b>	Additional Data Requirements	*						
Overall Package (Requirements 1-4)		*						

		Response	Rationale
Q6	<p><b><u>Data Items to be updated in line with Settlement Runs.</u></b></p> <p>Do you believe the list of items to be updated in line with Settlement and Reconciliation Runs as outlined within section 2.2.2 of the attached P103 Requirements Specification is appropriate. If you have any other data items you believe should be considered please identify these in your response.</p>		<p>If data is to be updated then the data items referred to in section 2.2.2 of the Requirements Specification would appear sensible. However we do not believe that by updating these values in line with Settlement Runs that this would better facilitate any of the Applicable BSC Objectives.</p>
Q7	<p><b><u>Data Retention</u></b></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for data to be retained and available on the BMRS prior to its archiving. What do you believe is an appropriate data retention period for data to be retained on the BMRS, please specify this in months (Please note that there is an interaction between P103 and P107 in respect of data retention).</p>	48 months	<p>BSC Agents should retain data for a period of 48 months on line to assist with the processing of Post Final Disputes. The BSC allows for a Dispute to be raised up to 36 months after the Settlement Day in question. In view of Modification Proposal P107 that is seeking to reduce that timescales associated with raising Disputes, subject to approval 28 months would appear a sensible timescale. The one caveat to this is the BMRS, the BMRS does not support the Dispute process and therefore maintaining the existing provision of retaining data for 12 months on the BMRS is a view we support.</p>
Q8	<p><b><u>Data Archiving</u></b></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for data to be retained once it has been archived and hence available for subsequent retrieval on request. How many years do you believe this data should be retained once it has been archived? (Please note that</p>	0	<p>In view of the current timescales allowed under the BSC regarding the raising of Disputes (36 months after the Settlement Day in question). There should not be any requirement to archive data, the online functionality of 48 months should be sufficient. If P107 were to introduce a reduced timescale for the</p>

	there is an interaction between P103 and P107 in respect of data retention).		raising of Disputes to 20 months, an additional 20 months of archived data would appear sensible. This would maintain the 48-month timescale, however this should be on the provision that the archived data is retrievable. As mentioned above this provision does not need to extend to include the BMRS as it does not support the Disputes process.
Q9	<p><b><u>Additional Data Querying Facilities</u></b></p> <p>With respect to Requirement 3, "Additional Data Querying Facilities", do you think it is appropriate to create a separate central data repository to contain the data that can be queried using such tools as Microsoft® Access® / Structured Query Language (SQL)?</p>	No	We have developed their own tools to allow for data querying and therefore we do not support the creation of additional data querying facilities.
		Response (Please answer "YES" or "NO")	
Q10	<p><b><u>Commercial Service Providers</u></b></p> <p>The Modification Group Terms of References included a request to determine whether the services outlined within P103 are currently provided as a commercial service. In order to address this issue, respondents are asked to identify if they are currently aware of any organisation currently providing services or tools described in P103 on a commercial basis.</p>	No	
Q11	<p><b><u>Confidentiality of Data</u></b></p> <p>As part of the terms of reference for Modification Proposal P103, the Panel asked the group to consider how confidential data should be treated. Do you believe data such as that contained within the Settlement Report SAA-I014 variant 2, (SO142) should be made publicly available on the BMRs or do you believe this data should be kept confidential to BSC Parties.</p>	Please specify your answer as "PUBLIC" / "CONFIDENTIAL"	Rationale

		Confidential	This flow is currently available to any BSC Party that requests the data flow from ELEXON. We support this information remaining confidential to prevent spurious assumptions being made by incorrect interpretations of this data set.
Q12	<p><b><u>Other Considerations</u></b></p> <p><b>Do you have any other comments you wish to make in relation to P103?</b></p>	<p><b>Please state your views.</b></p> <p>We do not agree that BSC Parties should fund this expensive work. The benefit to all BSC Parties is severely curtailed by the costs that have been incurred by many BSC Parties to procure systems to allow for interrogation of data. It is therefore unfair to ask BSC Parties to subsidise third parties to allow them access to an improved and upgraded service.</p>	

## P103\_ASS\_007 – SEEBOARD

We do not feel that this modification will better facilitate BSC objectives. It is also felt that costs of making these changes will significantly outweigh any benefits. Given that we do not require use of any service provided from this modification we do not see that we should incur any of these costs. If this modification is progressed it needs to be done so with a costing mechanism that is covered by participants using this information source. Solution provided should be such that any company, Party or non-Party, with no interest in taking up this facility will not be impacted and, therefore, incur any costs or changes.

We note within section 2.2.2 of this report that "Best View" prices currently published on BSC website have no obligations around their publication. We feel that use of this information could assist in negating need for this modification. An alternative modification that incorporates an obligation with regard to these prices within BSC should therefore be considered.

Dave Morton  
SEEBOARD Energy Limited

**P103\_ASS\_008 – Slough Heat and Power**

BSC Parties, Non Parties (including License Exempt Generators) are invited to provide their response on the questions below.

<b>Respondent:</b>	<i>Name SLOUGH ENERGY SUPPLIES LTD</i>			
<b>Responding on Behalf of</b>	<i>Please list all Parties responding on behalf of (including the respondent company if relevant). ). Slough Energy Supplies Limited (the respondent); Fibrepower Slough Limited (generator); Slough Energy contracts Limited (exemptable generator); Slough Utility Services Limited (exemptable generator).</i>			
<b>Role of Respondent</b>	<i>(BSC Party/ License Exempt Generator / Other (Please specify))</i>			
	<b>Question</b>		<b>Response Yes/No</b>	<b>Rationale</b>
Q1	<b><u>Applicable BSC Objectives</u></b> Do you believe that the following features, as described within Modification Proposal P103 and the accompanying Requirements Specification, would better facilitate the achievement of the applicable BSC Objectives:			
	<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable  <b>Approach 1</b>	Yes	At present the data is misleading. It is generally out of date. The existence of Elexon’s “Best View Prices” spreadsheet is testament to this – we note that there is no obligation on Elexon to publish this or to guarantee its accuracy.
		<b>Approach 2</b>	No	The cost is likely to be too great for limited benefit over approach 1.

	<b>Requirement 2</b>	A) Extended Data Retention	Yes	Yes – for example, any potential market entrant would require access to a reasonable market history. It is also necessary in relation to Requirement 1.
		B) Data Archiving and Retrieval	Yes	Ditto
	<b>Requirement 3</b>	Additional Data Querying Facilities	Yes	Yes – existing arrangements are unwieldy and smaller market participants are disadvantaged
	<b>Requirement 4</b>	Additional Data Requirements	Yes	<p>It is inappropriate to require smaller companies to have the extensive systems required to translate the large volume of raw data into material capable of being read, in addition to them having the resources to use the output to support their trading decisions.</p> <p>The intent behind the modification is to ensure that small BSC parties should have data available which is usable by them, in the context of systems which it is practical for them to operate.</p> <p>If as a result of this or other proposed modifications there were to be a larger number of small BSC parties, this would have no confidentiality implications since the data is already available to all existing BSC parties, although in a raw form and unsuitable for smaller parties, for the reasons stated above.</p>

	<p><b>Overall package of Requirements 1 – 4</b></p>	<p>Yes</p>	<p>The lack of availability of the information covered in the proposal (or the lack of availability of data in the format proposed) places LEGs and possibly smaller suppliers under an undue disadvantage relative to larger BSC parties, who often have the resources to access and process the data themselves. The BMRS was created on the formation of NETA in order to provide non and smaller BSC Parties with data in a form intended to be usable by parties unable to utilize the raw data available in the high grade service. The BMRS system is not developed to the point of meeting that need effectively. This is contrary to BSC Objectives. The implementation of P103 would assist the BSC Objective of “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.”</p>
<p><b>Q2</b></p>	<p><b><u>Approach to Implementation of Requirement 1</u></b>  Which approach (Approach 1 or 2) identified to address Requirement 1 in the attached Requirement Specification, do you believe would better facilitate the achievement of the Applicable BSC Objectives?</p>	<p>Response  <b>1</b></p>	<p>Availability of older (out-of-date) data will add to cost and may introduce confusion</p>
<p><b>Q3</b></p>	<p><b><u>Take up of P103</u></b>  Do you believe that if the enhancements to the BMRS as specified in the attached Requirements Specification were to be implemented your organisation would make use of them?</p>	<p>Response</p>	<p>Rationale</p>

	<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable (Approach 1 or 2)	Yes (1)	
	<b>Requirement 2</b>	A) Extended Data Retention	Yes	
		B) Data Archiving and Retrieval	Yes	
	<b>Requirement 3</b>	Additional Data Querying Facilities	Yes	
	<b>Requirement 4</b>	Additional Data Requirements	Yes	
	<b>Overall package of Requirements 1 – 4</b>		Yes	The answer is positive for two main reasons. First, we would be in a more advantageous position in negotiating with suppliers and other counterparties and identifying those amongst them with whom it would be most appropriate to engage in transactions. Second, we would be better positioned to anticipate and respond to imbalance prices. These considerations are important elements in generating competition in the market.

Q4	<p><b><u>Cost Recovery mechanism</u></b></p> <p>Do you believe the development cost for P103 should be spread across all BSC Parties? If you believe there are elements (Requirements 1 – 4) that should be charged for separately please specify this in your answer.</p>	Yes	<p>Removing what is in effect a discriminatory barrier to parties and/or smaller BSC Parties should not involve charging parties benefiting from the removal of the barrier; any more than parties are currently charged for access to the existing BMRS. This is unfinished business from the creation of the NETA systems.</p>					
Q5	<p><b><u>Development Costs</u></b></p> <p>In order to inform the discussions of the SSMG, how much value would you put on having these requirements implemented and hence would be prepared to fund as a central cost. (A Detailed Level Impact Assessment (DLIA) by the BSC Agent is being undertaken in parallel with this consultation) – The results of the DLIA will be considered along with the answers to this consultation at the same meeting of the SSMG.</p>	<p><i>Please fill in your answers in the table below. Please place an asterisk to indicate a level of development costs above which your support for the modification would be withdrawn (or if not applicable that you would support the modification if development costs exceeded £2.5M)</i></p> <p><b>We do not accept the validity of this question. This proposal addresses a discriminatory barrier that runs contrary to the BSC Objectives. The cost of removing a barrier that should never have existed in the first place should not be regarded as an 'additional' burden that BSC Parties have to bear. Had these costs been incorporated into the NETA systems from Go-Live, they would rightly be regarded as unavoidable costs of a fair system.</b></p>						
		£0 – I do not support this requirement	£1 – 100k	£100k to £250k	£250k to £500k	£500k to £1M	£1M to 2.5M	I support this modification proposal if central costs exceed £2.5M

<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable		*	*	*	*	*	*
	<b>Approach 1</b>							
	<b>Approach 2</b>							
<b>Requirement 2</b>	A) Extended Data Retention		*	*	*	*	*	*
	B) Data Archiving and Retrieval		*	*	*	*	*	*
<b>Requirement 3</b>	Additional Data Querying Facilities		*	*	*	*	*	*
<b>Requirement 4</b>	Additional Data Requirements		*	*	*	*	*	*
Overall Package (Requirements 1-4)			*	*	*	*	*	*
		<b>Response</b>	<b>Rationale</b>					

<p><b>Q6</b></p>	<p><b><u>Data Items to be updated in line with Settlement Runs.</u></b></p> <p>Do you believe the list of items to be updated in line with Settlement and Reconciliation Runs as outlined within section 2.2.2 of the attached P103 Requirements Specification is appropriate. If you have any other data items you believe should be considered please identify these in your response.</p>	<p>Yes – plus:</p>	<p>The term “metered quantities” in 2.5 (Additional Data Requirements) should be understood as referring to producing and consuming BM Units alike. This will allow LEGs to review the ability of different potential purchasers to absorb their embedded benefits. Any forced aggregation to GSP Group in the interests of “confidentiality” would be costly and unnecessary – it has never been demonstrated that (for example) directly connected consumers have any objection to release of data for their BM Unit (especially given that FPN data is already publicly available by BMU).</p>
<p><b>Q7</b></p>	<p><b><u>Data Retention</u></b></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for data to be retained and available on the BMRS prior to its archiving. What do you believe is an appropriate data retention period for data to be retained on the BMRS, please specify this in months (Please note that there is an interaction between P103 and P107 in respect of data retention).</p>	<p>36 months</p>	<p>The data for at least the previous two full years would be required. Taking into account P107, it would clearly be inappropriate to have a period of under 28 months, which means that when adding part years, 36 months is the minimum appropriate period.</p>
<p><b>Q8</b></p>	<p><b><u>Data Archiving</u></b></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for</p>	<p>Minimum 4 years and 2 months</p>	<p>Data should be held until the total period of retention and archiving exceeds a period of 6 years after the final reconciliation run. On this basis, if the retention period is determined at 36 months, the archiving period will be for the minimum period of 4</p>

	<p><b>data to be retained once it has been archived and hence available for subsequent retrieval on request. How many years do you believe this data should be retained once it has been archived?</b> (Please note that there is an interaction between P103 and P107 in respect of data retention).</p>		<p>years and 2 months. If the retention period is less than 36 months, the archiving period must be increased pro rata.</p>
<p><b>Q9</b></p>	<p><b><u>Additional Data Querying Facilities</u></b></p> <p>With respect to Requirement 3, "Additional Data Querying Facilities", do you think it is appropriate to create a separate central data repository to contain the data that can be queried using such tools as Microsoft® Access® / Structured Query Language (SQL)?</p>	<p>Yes</p>	<p>The existing service is extremely unwieldy and difficult to use without large-scale and dedicated facilities.</p>

		Response (Please answer "YES" or "NO")	
Q10	<p><u>Commercial Service Providers</u></p> <p>The Modification Group Terms of References included a request to determine whether the services outlined within P103 are currently provided as a commercial service. In order to address this issue, respondents are asked to identify if they are currently aware of any organisation currently providing services or tools described in P103 on a commercial basis.</p>	<p>Regardless of what services are currently supplied commercially, these services should be available as an industry service because they are an integral part of the market structure. See answer to Question 1.</p>	
Q11	<p><u>Confidentiality of Data</u></p> <p>As part of the terms of reference for Modification Proposal P103, the Panel asked the group to consider how confidential data should be treated. Do you believe data such as that contained within the Settlement Report SAA-I014 variant 2, (SO142) should be made publicly available on the BMRS or do you believe this data should be kept confidential to BSC Parties.</p>	<p>Please specify your answer as "PUBLIC"</p>	<p>Rationale</p>

		<p><b>Public</b></p>	<p>The data available is currently more restrictive than under the Pool, for no good reason – for example, non-BSC Parties have no access to data on transmission losses or metered volumes that were in the public domain under the Pool; and although published on Elexon’s web site, imbalance prices are otherwise not included in the currently available data. Not all data that could and should be made publicly available, is so.</p> <p>This proposed modification is concerned with making currently available information available in a more usable form. See reply to Question 1.</p> <p>Therefore the question of confidentiality does not arise; and to the extent that the data in practice has only been accessible to large BSC parties with their own systems there is no loss of confidentiality by making the data capable of interpretation and use by others including other smaller BSC Parties.</p>
<p><b>Q12</b></p>	<p><b><u>Other Considerations</u></b></p> <p><b>Do you have any other comments you wish to make in relation to P103?</b></p>	<p><b>Please state your views.</b></p>	<p>Since the BMRS was not incorporated into the design of NETA until a late stage, we are far from satisfied that the BMRS information arrangements have gone through a sufficiently rigorous process to relate them to actual market requirements; and in particular the development of a format and content which relates to the requirements and capacity of the users – particularly smaller and non BSC Parties. This proposed modification is designed to rectify this defect, in the interests of removing the barrier the defect creates and assisting in the generation of competition in the market place.</p>

**P103\_ASS\_009 – Scottish Power**

BSC Parties, Non Parties (including License Exempt Generators) are invited to provide their response on the questions below.

<b>Respondent:</b>	Man Kwong Liu		
<b>Responding on Behalf of</b>	<i>Please list all Parties responding on behalf of (including the respondent company if relevant).</i> Scottish Power plc; ScottishPower Energy Trading Ltd.; Scottish Power Generation plc; ScottishPower Energy Retail Ltd.; SP Transmission plc; SP Manweb plc.		
<b>Role of Respondent</b>	<i>(BSC Party/ License Exempt Generator / Other (Please specify) All</i>		
	<b>Question</b>	<b>Response Yes/No</b>	<b>Rationale</b>
Q1	<b><u>Applicable BSC Objectives</u></b> Do you believe that the following features, as described within Modification Proposal P103 and the accompanying Requirements Specification, would better facilitate the achievement of the applicable BSC Objectives:		

	<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable  <b>Approach 1</b>	No.	<p>We do not support this Mod Proposal. We do not believe that enhancing the current BMRA service would better the Applicable BSC Objectives. The information already exists in the public domain through the BMReports.com low grade service (accessible through the internet) and the high grade (dedicated connection which is constantly available) for a small monthly fee. The information is also available to BSC registered parties through the TIB messaging service for collation in a database. It is up to the individual party to do this and use the information for competitive advantage.</p> <p>The ability to collate information which updates the BMRA first pass data as the reconciliation runs change is also available to registered BSC parties through the S0142 settlement flows. Again, it is the choice of the BSC party to collate this data and use it for market advantage. Therefore, the main BSC objectives appear to have been satisfied as all BSC parties have access to all of the data.</p> <p>We have already expended resource and cost on additional system functionality to adapt the BMRS data for our own analytical use which P103 seems to recreate. We are therefore not prepared to support or fund the proposed changes.</p>
		<b>Approach 2</b>	No.	See our comments above.
	<b>Requirement 2</b>	A) Extended Data Retention	No.	See our comments above.

		B) Data Archiving and Retrieval	No.	See our comments above.
	<b>Requirement 3</b>	Additional Data Querying Facilities	No.	See our comments above.
	<b>Requirement 4</b>	Additional Data Requirements	No.	See our comments above.
	<b>Overall package of Requirements 1 – 4</b>		No.	See our comments above.
<b>Q2</b>	<b><u>Approach to Implementation of Requirement 1</u></b> Which approach (Approach 1 or 2) identified to address Requirement 1 in the attached Requirement Specification, do you believe would better facilitate the achievement of the Applicable BSC Objectives?		Response  1 or 2	Neither. See our comments above.
<b>Q3</b>	<b><u>Take up of P103</u></b> Do you believe that if the enhancements to the BMRS as specified in the attached Requirements Specification were to be implemented your organisation would make use of them?		<b>Response Yes / No</b>	<b>Rationale</b>
	<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable  (Approach 1 or 2)	No.	See our comments above.
	<b>Requirement 2</b>	A) Extended Data Retention	No.	See our comments above.
		B) Data Archiving and Retrieval	No.	See our comments above.
	<b>Requirement 3</b>	Additional Data Querying Facilities	No.	See our comments above.
	<b>Requirement 4</b>	Additional Data Requirements	No.	See our comments above.
	<b>Overall package of Requirements 1 – 4</b>		No.	See our comments above.

<p><b>Q4</b></p>	<p><b><u>Cost Recovery mechanism</u></b></p> <p>Do you believe the development cost for P103 should be spread across all BSC Parties? If you believe there are elements (Requirements 1 – 4) that should be charged for separately please specify this in your answer.</p>	<p>No.</p>	<p>As most (if not all) BSC parties have already invested in BMRA systems - either through bespoke development or purchasing off the shelf solutions - it would be unfair to expect that spreading of the costs would be agreeable to all market participants. The proposed changes to the BMRA system would impact on a few small generators and would provide no benefit to those with solutions currently in place.</p> <p>It should be considered that NETA is almost 2 years old and that changes to BMReports.com and the BMRA at this stage would not be actively embraced by many, as alternatives have already been sought and funded. If it had been highlighted (at the beginning of NETA) that the current BMReports.com would be up for change, the level of investment at this stage by many would have been far less.</p> <p>Costs should be paid by those parties who request and use these facilities, (as in the case of P50).</p>
<p><b>Q5</b></p>	<p><b><u>Development Costs</u></b></p> <p>In order to inform the discussions of the SSMG, how much value would you put on having these requirements implemented and hence would be prepared to fund as a central cost. (A Detailed Level Impact Assessment (DLIA) by the BSC Agent is being undertaken in parallel with this consultation) – The results of the DLIA will be considered along with the answers to this consultation at the same meeting of the SSMG.</p>	<p><i>Please fill in your answers in the table below. Please place an asterisk to indicate a level of development costs above which your support for the modification would be withdrawn (or if not applicable that you would support the modification if development costs exceeded £2.5M)</i></p>	

		£0 – I do not support this requirement	£1 – 100k	£100k to £250k	£250k to £500k	£500k to £1M	£1M to 2.5M	I support this modification proposal if central costs exceed £2.5M
<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable							
	<b>Approach 1</b>	✓						
	<b>Approach 2</b>	✓						
<b>Requirement 2</b>	A) Extended Data Retention	✓						
	B) Data Archiving and Retrieval	✓						
<b>Requirement 3</b>	Additional Data Querying Facilities	✓						
<b>Requirement 4</b>	Additional Data Requirements	✓						
Overall Package (Requirements 1-4)		✓ There would be no additional value to SP if these requirements were met.						
					<b>Response</b>	<b>Rationale</b>		
<b>Q6</b>	<b><u>Data Items to be updated in line with Settlement Runs.</u></b> Do you believe the list of items to be updated in line with				No.	Please see our comments on Qu 1.		

	Settlement and Reconciliation Runs as outlined within section 2.2.2 of the attached P103 Requirements Specification is appropriate. If you have any other data items you believe should be considered please identify these in your response.		
		<b>Response</b>	<b>Rationale</b>
Q7	<p><b><u>Data Retention</u></b></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for data to be retained and available on the BMRS prior to its archiving. What do you believe is an appropriate data retention period for data to be retained on the BMRS, please specify this in months (Please note that there is an interaction between P103 and P107 in respect of data retention).</p>	12 months	<p>P107 proposes a general consistent data retention arrangement, particularly to cover dispute process.</p> <p>We believe that the current Data Retention arrangement in BMRS is appropriate as these data are for information only and are not used in any dispute process. Therefore, they should not need to be retained for the same (longer) duration.</p>
Q8	<p><b><u>Data Archiving</u></b></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for data to be retained once it has been archived and hence available for subsequent retrieval on request. How many years do you believe this data should be retained once it has been archived? (Please note that there is an interaction between P103 and P107 in respect of data retention).</p>	0 Years	<p>We note that the SSMG Mod Group proposed 5 years for this. We would like to see the rationale in this suggestion. As we have already had developed system to analyse these data, we do not require them to be retained at all.</p>
Q9	<p><b><u>Additional Data Querying Facilities</u></b></p> <p>With respect to Requirement 3, "Additional Data Querying Facilities", do you think it is appropriate to create a separate central data repository to contain the data that can be queried</p>	No.	<p>The implementation of these services would provide no additional benefit to SP as they are covered by the current BMRA system and S0142 systems (and this will probably be the case for most other BSC parties).</p>

	using such tools as Microsoft® Access® / Structured Query Language (SQL)?		Please also see our comments on Qu. 1.
		<b>Response (Please answer "YES" or "NO")</b>	
Q10	<p><u>Commercial Service Providers</u></p> <p>The Modification Group Terms of References included a request to determine whether the services outlined within P103 are currently provided as a commercial service. In order to address this issue, respondents are asked to identify if they are currently aware of any organisation currently providing services or tools described in P103 on a commercial basis.</p>	No comment.	
Q11	<p><u>Confidentiality of Data</u></p> <p>As part of the terms of reference for Modification Proposal P103, the Panel asked the group to consider how confidential data should be treated. Do you believe data such as that contained within the Settlement Report SAA-I014 variant 2, (SO142) should be made publicly available on the BMRs or do you believe this data should be kept confidential to BSC Parties. be made publicly available on the BMRs or do you believe this data should be kept confidential to BSC Parties. be made publicly available on the BMRs or do you believe this data should be kept confidential to BSC Parties.</p>	<p><b>Please specify your answer as "PUBLIC" / "CONFIDENTIAL"</b></p>	<p><b>Rationale</b></p>
		Public.	This is already available on request from Elexon.

<b>Q12</b>	<b><u>Other Considerations</u></b>  <b>Do you have any other comments you wish to make in relation to P103?</b>	<b>Please state your views.</b>  P103 would not provide SP with any further facilities or market advantage. Therefore we are not be prepared to contribute towards the costs for the implementation of these facilities to help smaller participants such as LEGs. Whilst SP are actively encouraging full participation in the market and appreciating that this is enhanced by having access to market data on which to base decisions, we would emphasise that the data is freely available to all, therefore the main objectives of providing data in a clear and concise manner have been satisfied.
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## P103\_ASS\_010 – Scottish and Southern

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

Further to your note of 20th November 2002, and the associated Draft Modification Report for P103, we have the following comments to make on the questions posed.

Q1 No

Q2 Neither, as we do not believe that P103 in its entirety, or Requirement 1, better facilitates the achievement of the BSC Objectives.

Q3

Q4 The development costs should NOT be spread across all BSC Parties. If any of the four 'elements' is put into effect then it should be charged separately.

Q5 Requirement 1 £0  
Requirement 2 £0  
Requirement 3 £0  
Requirement 4 £0

Q6

Q7 As the Proposer of P107 we support the timescale outlined in P107.

Q8 As the Proposer of P107 we support the timescale outlined in P107.

Q9 Whilst we do not support P103, or the specifics of Requirement 3, we agree that if it were to be made that using such tools would be appropriate.

Q10 No.

Q11 Confidential.

Q12 None at this time.

Regards

Garth Graham  
Scottish and Southern Energy plc

P103\_ASS\_011 – NGC

BSC Parties, Non Parties (including License Exempt Generators) are invited to provide their response on the questions below.

<b>Respondent:</b>		<b>National Grid</b>		
<b>Responding on Behalf of</b>		<i>Please list all Parties responding on behalf of (including the respondent company if relevant).</i> <b>National Grid</b>		
<b>Role of Respondent</b>		<i>(BSC Party/ License Exempt Generator / Other (Please specify))</i> : <b>BSC Party</b>		
	<b>Question</b>		<b>Response Yes/No</b>	<b>Rationale</b>
<b>Q1</b>	<p><b><u>Applicable BSC Objectives</u></b></p> <p>Do you believe that the following features, as described within Modification Proposal P103 and the accompanying Requirements Specification, would better facilitate the achievement of the applicable BSC Objectives:</p>			
	<p><b>Requirement 1</b></p> <p>Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable</p> <p><b>Approach 1</b></p>		<b>No</b>	See below
	<p><b>Approach 2</b></p>		<b>No</b>	See below
	<p><b>Requirement 2</b></p> <p>A) Extended Data Retention</p>		<b>No</b>	See below
	<p>B) Data Archiving and Retrieval</p>		<b>No</b>	See below
	<p><b>Requirement 3</b></p> <p>Additional Data Querying Facilities</p>		<b>No</b>	See below
	<p><b>Requirement 4</b></p> <p>Additional Data Requirements</p>		<b>No</b>	See below

	Overall package of Requirements 1 – 4	No	We believe that whilst the proposals would tend to promote competition, BSC Objective (c), this is over-ridden the fact that none of the requirements would better facilitate BSC Objective (d) "Promoting efficiency in the implementation and administration of the balancing and settlement arrangements." A central bespoke service may have been appropriate at the start of NETA but given that most BSC parties have invested in tailor made tools to interrogate the raw data flows, they should not now be exposed to the potential significant costs of developing a central service.
Q2	<u>Approach to Implementation of Requirement 1</u> Which approach (Approach 1 or 2) identified to address Requirement 1 in the attached Requirement Specification, do you believe would better facilitate the achievement of the Applicable BSC Objectives?	Response 1	The overwrite (option 1) method is the more appropriate approach as the alternative additive (option 2) method will provide the same result but at a higher cost. The lack of "history" between settlement runs should be managed by participants. However, please see response to Q 1 regarding our views overall on whether the proposal better facilitates the BSC Objectives.
Q3	<u>Take up of P103</u> Do you believe that if the enhancements to the BMRS as specified in the attached Requirements Specification were to be implemented your organisation would make use of them?	Response Yes / No	Rationale

	<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable (Approach 1 or 2)	<b>No</b>	See below
	<b>Requirement 2</b>	A) Extended Data Retention	<b>No</b>	See below
		B) Data Archiving and Retrieval	<b>No</b>	See below
	<b>Requirement 3</b>	Additional Data Querying Facilities	<b>No</b>	See below
	<b>Requirement 4</b>	Additional Data Requirements	<b>No</b>	See below
	<b>Overall package of Requirements 1 – 4</b>		<b>No</b>	<b>We are unlikely to use an enhanced BMRS as we have invested in a tailor-made system (data warehouse plus query system) that uses data sourced from the SAA-IO14 sub flow 2.</b>
<b>Q4</b>	<b><u>Cost Recovery mechanism</u></b> Do you believe the development cost for P103 should be spread across all BSC Parties? If you believe there are elements (Requirements 1 – 4) that should be charged for separately please specify this in your answer.		<b>No</b>	<b>Many parties have already invested in their own systems and should not be expected to pay again for a central system.</b>

Q5	<p><b>Development Costs</b></p> <p>In order to inform the discussions of the SSMG, how much value would you put on having these requirements implemented and hence would be prepared to fund as a central cost. (A Detailed Level Impact Assessment (DLIA) by the BSC Agent is being undertaken in parallel with this consultation) – The results of the DLIA will be considered along with the answers to this consultation at the same meeting of the SSMG.</p>		<p>Please fill in your answers in the table below. Please place an asterisk to indicate a level of development costs above which your support for the modification would be withdrawn (or if not applicable that you would support the modification if development costs exceeded £2.5M)</p>					
		£0 – I do not support this requirement	£1 – 100k	£100k to £250k	£250k to £500k	£500k to £1M	£1M to 2.5M	I support this modification proposal if central costs exceed £2.5M
<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable	*						
	<b>Approach 1</b>							
	<b>Approach 2</b>	*						
<b>Requirement 2</b>	A) Extended Data Retention	*						
	B) Data Archiving and Retrieval	*						
<b>Requirement 3</b>	Additional Data Querying Facilities	*						
<b>Requirement 4</b>	Additional Data Requirements	*						
Overall Package (Requirements 1-4)		*						

		Response	Rationale
Q6	<p><u>Data Items to be updated in line with Settlement Runs.</u></p> <p>Do you believe the list of items to be updated in line with Settlement and Reconciliation Runs as outlined within section 2.2.2 of the attached P103 Requirements Specification is appropriate. If you have any other data items you believe should be considered please identify these in your response.</p>		In view of our previous responses we have not responded to this question.
		Response	Rationale
Q7	<p><u>Data Retention</u></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for data to be retained and available on the BMRS prior to its archiving. What do you believe is an appropriate data retention period for data to be retained on the BMRS, please specify this in months (Please note that there is an interaction between P103 and P107 in respect of data retention).</p>	12 months	Whilst not supporting the proposal, we believe that the existing 12 month retention is appropriate as it allows participants sufficient time to download information into their local storage area.
Q8	<p><u>Data Archiving</u></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for data to be retained once it has been archived and hence available for subsequent retrieval on request. How many years do you believe this data should be retained once it has been archived? (Please note that</p>	2-3 Years	Whilst not supporting the proposal, we believe that a period of 2 to 3 years will be sufficient. This is based upon the timescales of raising and resolving a dispute on settlement data. We note that this duration is currently being debated within modification P107 and suggest

	there is an interaction between P103 and P107 in respect of data retention).		that the duration should reflect this debate.
Q9	<p><b><u>Additional Data Querying Facilities</u></b></p> <p>With respect to Requirement 3, "Additional Data Querying Facilities", do you think it is appropriate to create a separate central data repository to contain the data that can be queried using such tools as Microsoft® Access® / Structured Query Language (SQL)?</p>	No	We believe that raw data is more appropriate. With complex queries, the 'hierarchy' for filtering data will be crucial. It is better that the end user designs and manipulates his/her own criteria for analysis rather than rely on a central service.
		Response (Please answer "YES" or "NO")	
Q10	<p><b><u>Commercial Service Providers</u></b></p> <p>The Modification Group Terms of References included a request to determine whether the services outlined within P103 are currently provided as a commercial service. In order to address this issue, respondents are asked to identify if they are currently aware of any organisation currently providing services or tools described in P103 on a commercial basis.</p>	NO	
Q11	<p><b><u>Confidentiality of Data</u></b></p> <p>As part of the terms of reference for Modification Proposal P103, the Panel asked the group to consider how confidential data should be treated. Do you believe data such as that contained within the Settlement Report SAA-I014 variant 2, (SO142) should be made publicly available on the BMRs or do you believe this data should be kept confidential to BSC Parties.</p>	Please specify your answer as "PUBLIC" / "CONFIDENTIAL"	Rationale

		CONFIDENTIAL to BSC Parties	The interaction with P102 is crucial in this respect. If non-trading parties are allowed BSC Party status then the SAA-IO14 sub flow 2 will be available (on request) to all interested parties. We do not support full web access of the data as the potential high cost does not warrant the likely take up.
Q12	<p><u>Other Considerations</u></p> <p>Do you have any other comments you wish to make in relation to P103?</p>	Please state your views.	<p>We would like the SSMG to note a recent paper (ISG/20/215) "Options for making Market Data Available" discussed at the Imbalance settlement Group. The minutes of the discussion record: " ISG discussed the three options outlined in the paper and felt that option 3, to provide a bespoke service that stores all available data, may have been desirable at the start of the market, but was now unlikely to be widely supported by participants. Many parties would, by now, have tailored their systems to meet their requirements and were unlikely to want to have to change them for this service. Also the costs of option 3 were likely to be significant and, in light of the uncertain take up, were not felt to be warranted."</p>

**P103\_ASS\_012 – Powergen**

BSC Parties, Non Parties (including License Exempt Generators) are invited to provide their response on the questions below.

<b>Respondent:</b>	Powergen UK plc		
<b>Responding on Behalf of</b>	Powergen UK plc, Powergen Retail Limited, Diamond Power Generation Limited, Cottam Development Centre Limited, TXU Europe Drakelow Limited, TXU Europe Ironbridge Limited, TXU Europe High Marnham Limited, Midlands Gas Limited, Western Gas Limited, TXU Europe (AHG) Limited, TXU Europe (AH Online) Limited, Citigen (London) Limited, Severn Trent Energy Limited (known as TXU Europe (AHST) Limited), TXU Europe (AHGD) Limited and Ownlabel Energy Limited		
<b>Role of Respondent</b>	BSC Party		
	<b>Question</b>	<b>Response Yes/No</b>	<b>Rationale</b>
<b>Q1</b>	<b><u>Applicable BSC Objectives</u></b>  Do you believe that the following features, as described within Modification Proposal P103 and the accompanying Requirements Specification, would better facilitate the achievement of the applicable BSC Objectives:		
	<b>Requirement 1</b> Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable  <b>Approach 1</b>	No	Our preferred solution is for some form of licensing arrangement. The answer to Requirement 3 gives further views.
	<b>Approach 2</b>	No	We believe that this would substantially increase the amount of data required and subsequently make the cost of this option prohibitive.

	<b>Requirement 2</b>	A) Extended Data Retention	No	We believe that if non BSC parties can obtain access to this data under licence then it should not be the BMRA's responsibility to provide data retention facilities. If the data is available to all and a requirement for retained data is large enough, then third party providers of this service will emerge.
		B) Data Archiving and Retrieval	No	The BMRA archiving should not change. As stated above, if the market as a whole requires more retention than this we believe that third party providers of this service will emerge.
	<b>Requirement 3</b>	Additional Data Querying Facilities	No	We would prefer to see an option which allows non BSC parties access to general data set available to BSC Parties using existing report formats. We do not feel the BMRS is the right place to provide this additional data or to provide analysis functions. More appropriately a licensing solution should be developed which allows others access to this data. We would anticipate that this would allow third parties such as consultants to provide data analysis products for those who do not wish, or can not afford, to do their own analysis.
	<b>Requirement 4</b>	Additional Data Requirements	No	Please see the answer for Requirement 3.
	<b>Overall package of Requirements 1 – 4</b>		No	
<b>Q2</b>	<b><u>Approach to Implementation of Requirement 1</u></b> Which approach (Approach 1 or 2) identified to address Requirement 1 in the attached Requirement Specification, do you		Response 1	On the basis of cost. However, the licensing route would by far better meet the BSC objectives.

	believe would better facilitate the achievement of the Applicable BSC Objectives?			
<b>Q3</b>	<b><u>Take up of P103</u></b> Do you believe that if the enhancements to the BMRS as specified in the attached Requirements Specification were to be implemented your organisation would make use of them?		<b>Response</b> Yes / No	<b>Rationale</b>
	<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable  (Approach 1 or 2)	No	We already have access to this information and have built our systems accordingly.
	<b>Requirement 2</b>	A) Extended Data Retention	No	It is our responsibility to meet our own requirements in this respect.
		B) Data Archiving and Retrieval	No	It is our responsibility to meet our own requirements in this respect.
	<b>Requirement 3</b>	Additional Data Querying Facilities	No	It is our responsibility to meet our own requirements in this respect.
	<b>Requirement 4</b>	Additional Data Requirements	No	We already have access to this information and have built our systems accordingly.
	<b>Overall package of Requirements 1 – 4</b>		No	
<b>Q4</b>	<b><u>Cost Recovery mechanism</u></b> Do you believe the development cost for P103 should be spread across all BSC Parties? If you believe there are elements (Requirements 1 – 4) that should be charged for separately please specify this in your answer.		No	Although we do not know whether another approach is acceptable under the BSC. We do not feel that BSC Parties will benefit from this proposal so should not be required to pay for it.

Q5	<p><b>Development Costs</b></p> <p>In order to inform the discussions of the SSMG, how much value would you put on having these requirements implemented and hence would be prepared to fund as a central cost. (A Detailed Level Impact Assessment (DLIA) by the BSC Agent is being undertaken in parallel with this consultation) – The results of the DLIA will be considered along with the answers to this consultation at the same meeting of the SSMG.</p>		<p>Please fill in your answers in the table below. Please place an asterisk to indicate a level of development costs above which your support for the modification would be withdrawn (or if not applicable that you would support the modification if development costs exceeded £2.5M)</p>					
		£0 – I do not support this requirement	£1 – 100k	£100k to £250k	£250k to £500k	£500k to £1M	£1M to 2.5M	I support this modification proposal if central costs exceed £2.5M
<b>Requirement 1</b>	Update of Data displayed on the BMRS in line with Settlement and Reconciliation Timetable	*						
	<b>Approach 1</b>							
	<b>Approach 2</b>	*						
<b>Requirement 2</b>	A) Extended Data Retention	*						
	B) Data Archiving and Retrieval	*						
<b>Requirement 3</b>	Additional Data Querying Facilities	*						
<b>Requirement 4</b>	Additional Data Requirements	*						
	Overall Package (Requirements 1-4)	*						

		Response	Rationale
Q6	<p><b><u>Data Items to be updated in line with Settlement Runs.</u></b></p> <p>Do you believe the list of items to be updated in line with Settlement and Reconciliation Runs as outlined within section 2.2.2 of the attached P103 Requirements Specification is appropriate. If you have any other data items you believe should be considered please identify these in your response.</p>	N/A	
		Response	Rationale
Q7	<p><b><u>Data Retention</u></b></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for data to be retained and available on the BMRS prior to its archiving. What do you believe is an appropriate data retention period for data to be retained on the BMRS, please specify this in months (Please note that there is an interaction between P103 and P107 in respect of data retention).</p>	N/A	Please see previous answers in respect of Requirement 2A.
Q8	<p><b><u>Data Archiving</u></b></p> <p>Depending on the cost of providing the service, the SSMG will come to a view on the appropriate duration for data to be retained once it has been archived and hence available for subsequent retrieval on request. How many years do you believe this data should be retained once it has been archived? (Please note that there is an interaction between P103 and P107 in respect of data retention).</p>	N/A	Please see previous answers in respect of Requirement 2B.

Q9	<p><b><u>Additional Data Querying Facilities</u></b></p> <p>With respect to Requirement 3, "Additional Data Querying Facilities", do you think it is appropriate to create a separate central data repository to contain the data that can be queried using such tools as Microsoft® Access® / Structured Query Language (SQL)?</p>	No	These services should be provided in the market to those who require them and are willing to pay for them.
		Response (Please answer "YES" or "NO")	
Q10	<p><b><u>Commercial Service Providers</u></b></p> <p>The Modification Group Terms of References included a request to determine whether the services outlined within P103 are currently provided as a commercial service. In order to address this issue, respondents are asked to identify if they are currently aware of any organisation currently providing services or tools described in P103 on a commercial basis.</p>	No.	
Q11	<p><b><u>Confidentiality of Data</u></b></p> <p>As part of the terms of reference for Modification Proposal P103, the Panel asked the group to consider how confidential data should be treated. Do you believe data such as that contained within the Settlement Report SAA-I014 variant 2, (SO142) should be made publicly available on the BMRs or do you believe this data should be kept confidential to BSC Parties.</p>	Please specify your answer as "PUBLIC" / "CONFIDENTIAL"	Rationale
		Public.	All data which is available to BSC Parties <u>as a whole</u> could be made public. The issue is whether the BMRS is the right vehicle for this and the cost recovery mechanism for providing this data.

Q12	<b><u>Other Considerations</u></b> Do you have any other comments you wish to make in relation to P103?	Please state your views. No.
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## **P103\_ASS\_013 – Renewable Power Association**

### Assessment Consultations P103

I am writing on behalf of the Renewable Power Association to express support for the above modification proposal to the BSC Code.

The Renewable Power Association is a trade association representing producers of renewable energy. It is pan-technology – its members are involved in all forms of renewable energy, including biomass, wind energy, solar, biogas, energy-from-waste, landfill gas, hydropower, wave, tidal stream and sewage gas. Its membership also includes producers of heat and biofuels and those working in the field of hydrogen, fuel cells and recovery of waste heat, which, when combined with renewables, have the potential to offer a totally sustainable package. Legal, accounting and energy trading businesses are also represented. Together the RPA's membership accounts for almost 70% of ROC-accredited generating capacity.

In summary P103 would improve the quality and therefore the usefulness of market data made available to BSC parties.

Brief answers to the questions posed in the consultation proforma are given below.

**Q.1 Do you think that the following features described in the proposed modification would better facilitate the BSC objectives?**

Answer

**Update of data on BMRS to put it in line with Settlement and Reconciliation Timetable.** Yes. Without being updated, the data is of limited value to parties.

**Extend Data Retention and Data Archiving and Retrieval.** Yes. Any potential market entrant needs a reasonable market history and it assists in relation to Requirement 1.

**Additional Data Querying Facilities.** Yes. Existing arrangements are unwieldy and smaller market participants are disadvantaged.

**Additional Data Requirements.** Yes. This will ensure that important and useful trading data is not kept "confidential" to BSC parties alone.

Generally, lack of available information places LEGs under an undue disadvantage relative to BSC parties which is contrary to BSC objectives. This proposed modification helps rectify the position.

**Q2. Which of the two approaches cited in the assessment should be used for Requirement 1.**

Answer

Approach 1.

**Q3. Do you believe that if the enhancements were made to the BMRS your organisation would use them?**

Answer

Some RPA members would use them.

**Q4. Cost Recovery**

**Should the cost of these data developments be spread across all Parties?**

Answer

Yes – because the effect of these changes is to remove an unfair barrier to non BSC Parties.

**Q5. Development Costs**

**How much value would you place on these data requirements being implemented and therefore would be prepared to fund as part of a Balancing and Settlement central cost.**

**Answer**

These data charges need to be implemented in the interest of fairness, and the cost is the cost of removing a barrier.

**Q6 to 11 [Detailed questions]**

Slough Heat and Power, an RPA member has provided answers to these detailed questions.

**Q11 and Q12. Confidentiality and Other considerations.**

**Answer**

Given that all BSC Parties have access to all SO142 data, there can be no justification for confidentiality restrictions.

It is important that LEGs and other non BSC Parties have fair access to information available to BSC Parties which can influence the trading decisions of BSC Parties when contracting with non BSC Parties. It is important in order to facilitate competition, that the facility be available.

I hope you find these comments useful.

Gaynor Hartnell,  
Director of Policy, RPA.