P291 Impact Assessment Responses

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Impact Assessment issued on 21 March 2013

We received responses from:

Company	Role of Parties/non-Parties represented
Centrica	Generator / Trader / Supplier / BSC Party
TMA Data Management Ltd	Party Agent
Drax Power Limited	Generator
National Grid	Transmission Company
RWE Supply & Trading GmbH	Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent
Eggborough Power Limited	Generator
IBM UK Ltd for and on behalf of the ScottishPower Group	Supplier / Generator / Trader / Consolidator / Exemptable Generator / Distributor
E.ON	Supplier / Generator / Trader / Consolidator / Exemptable Generator
EDF Energy	Generator / Supplier / Party Agent / Consolidator / Exemptable Generator / Trader
SSE plc	Supplier / Generator / Trader / Consolidator / Distributor

Question 1: Will P291 impact your organisation?

Responses

Respondent	Response
Centrica	**Yes**
TMA Data Management Ltd	**No**
Drax Power Limited	**Yes** Assuming that a viable solution is developed that meets the REMIT inside information requirements and conforms to ACER's associated guidance, we would support publishing relevant data on the BMRS website. At this early stage, it is difficult to provide detailed information on how P291 may impact our organisation. But at a high level, we would be required to make changes to our internal IT systems (in particular, those systems that interact with EDL) if we wished to take advantage of a P291 solution.
National Grid	**Yes** The precision of the solution impacts provided below is constrained by the current level of detail provided for the proposed solutions. In particular, further exploration and detail of the following issues would enhance clarity: a cross-reference of information already published (e.g. on bmreports.com) against additional data required; the scope of involvement required by National Grid for handling the data, that is, whether there would be any requirement for: data processing, data aggregation, data validation, data storage. The remainder of this response should be read taking into account this data limitation. Solution C and Solution F have a Transmission Company system and process impact. Solution D and E also have a Transmission Company impact but the impact is the same as under Solution C. Solution C proposes that information submitted to National Grid under the Grid Code is published on the BMRS website to meet the REMIT obligations of some industry parties. The Grid Code information that will be required under Solution C is: • Generator outage information submitted to National Grid under OC2 by BMU; and • Physical Notification (PN) and Maximum Export/Import Limit (MEL/MIL) redeclarations by BMU. It should be noted that data is already made available on bmreports.com, e.g. Output Usable for longer timescales and the MEL and PN for shorter timescales, further definition of what additional information required for a given asset would enable more precise determination of impacts. Two system are impacted by Solution C (and Solutions D, E and F): TOGA (Transmission Outage and Generator Availability) and EBS* (Electricity Balancing System) **Implementation Timescale**

Respondent	Response
	Following EBS implementation in late 2013 there will be a change freeze period in order to allow for a period of change stability as well as correcting any launch issues. The duration of this change freeze is yet to be determined and may range from 3 to 6 months. Further changes to EBS will thus be made post mid-2014 and changes required as part of modification P291 could be incorporated with the **February 2015** BSC System release. **TOGA** P291 seeks to publish generator outage information onto the BMRS website, currently TOGA is the source of Output Usable data which is published, by BMU, and fuel type on the BMRS website. Whilst Output Usable is derived from generator availability, P291 seeks to separately publish Outage data by BMU, it also seeks to increase the frequency of publication on the BMRS platform and seeks to increase the number of fields and data participants, submitting to TOGA in order to ensure the publication on the BMRS platform captures REMIT requirements. The changes to TOGA include: • Changes to the internal data structure to accommodate new record sets and new database tables • New processes to query and generate output in the required format • Revision of current FTP transmission process to forward the data to the BMRA platform on a more frequent basis whilst continuing with the existing output usable process In addition there will be a number of ancillary changes required including: • Modifications to TOGA test and deployment scripts • Modification to the BMRA and SAA Interface Specification • Grid Code change(s) to support new data input from generators The scale of costs associated with TOGA changes are highly sensitive to the scope of requirements for specific data types, formatting, processing and storage and as such should be treated with prudence. The cost assessment for the IT changes is approximately **£150k** (high level estimate). The timescale for any TOGA changes could be accommodated in the timescales consistent with EBS changes. **EBS** The existing BM Systems submit data to the BMRS platform and the new EBS system will continue to do so. Data that EBS will submit to the BMRS platform which is related to P291 are short term PN declarations (<2 days) and BM Window MEL/MIL redeclarations. However the P291 solution seeks to increase the number of data fields that will be published alongside the PN/MEL information, further specific detail on what new data fields are required and the format they would take would enhance the accuracy of these cost

Respondent	Response
	assessments. The changes to EBS will include: • Changes to the internal data structure to accommodate new record sets and new database tables • New processes to query and generate output in the required format • Revision and addition to current transmission process to forward the data to the BMRA platform at the required frequency. In addition there will be a number ancillary changes required including: • Modification to the BMRA and SAA Interface Specification • Grid Code change(s) to support new data input from generators The cost assessment for the EBS IT changes is approximately **£200k** (high level estimate). However this cost is dependent on the scope of the data and process specification, that is, the degree to which National Grid are required to process, aggregate, validate and/or store any additional data. The timescale for EBS change is as detailed above (**Feb-2015**). Solution C would allow existing data submitted to National Grid to be forwarded to the BMRS platform. The total cost for **Solution C** is thus approximately **£350k** (high level estimate), dependent on specification. **Standalone Web-based Ad-hoc System** Solution F captures Solution C and in addition, incorporates the submission of ad-hoc data via a new National Grid web-based system. Solution F would require the design and implementation of a new standalone system, the system would require: • Robust availability • Web availability • Secure Login • User account creation and maintenance • Linkage between accounts and assets that are to be reported on • Validation of user data submission • Onward transmission of data to the BMRS platform The cost assessment for a new system for ad-hoc data submission system is approximately **£200k** (high level estimate). The total solution F costs will include those for Solution C and thus equate to approximately **£550k** (high level estimate). The timescale for implementation could be accommodated in the timescales consistent with EBS changes. There would also be ongoing operational costs associated with this solution, the magnitude of which would depend on requirements for the system's platform, resilience and complexity as well as the required service level; pending these the indicative

Respondent	Response
	costs are likely to be **up to approximately £150k** (high level estimate). *Please note that EBS is the National Grid system replacing the current BM system(s), and is due to be implemented in late 2013. This TCA assumes that this modification will be implemented after EBS is in place and that the relevant IT changes will thus only be required for EBS rather than existing BM Systems.
RWE Supply & Trading GmbH	**Yes** We currently publish REMIT compliant information on our website and provided that the data formats remain the same as those that we currently publish remain the same and that the Grid Code is changed appropriately (Method 3) we do not envisage that there would be a material costs associated with publication of the relevant data. With regard to the alternative implementation options we have the following comments: Method 1: We would need to develop new data streams and information feeds to implement Method 1. These would either be based on existing EDL data submissions or require systems to capture the information, particularly at the power stations. We are concerned that the costs associated with the development of the appropriate systems to deliver Method 1 would be material and may be in excess of £0.5m. Essentially we would be required to duplicate existing systems such as EDL. Method 2: As for Method 1, we would need to develop new data streams and information feeds to implement Method 2. These would either be based on existing EDL data submissions or require systems to capture the information, particularly at the power stations. We are concerned that the costs associated with the development of the appropriate systems to deliver Method 2 would be material and may be in excess of £0.5m. Essentially we would be required to duplicate existing systems such as EDL. Method 3: As noted above our preference would be to implement Method 3 which would utilise existing data submission using EDL. If systems are developed on the basis of our current submissions and in the same format to our own web page which is based on EDL data then we do not envisage that there would be a material cost. However, if data formats were to change then we would incur certain development costs. These are significantly lower than for Method 1 or Method 2 since we would be developing data feeds based on existing Grid Code submissions. We would also benefit from a standardisation of approach in the treatment of data submissions by the central systems which may save significant development costs (this includes for example standard treatment of dynamic parameters in deriving outage data).
Eggborough Power Limited	**Yes**

Respondent	Response
	As a large generator Eggborough Power Limited (EPL) has to report outage data under REMIT. As Grid Code signatories EPL already submits data to Grid, so in an ideal world EPL would like to see Grid Code data used so as not to create additional data flows. However, EPL recognise there may be a need for ad hoc data flows and there is also a need to accommodate data from non Grid Code parties. It would therefore appear that method F would provide the best solution as it effectively enhances the Grid Code flows. EPL does not believe that the Portal is an appropriate system as it is simply not designed to be easily accessible and the persistent password protecting, etc. would create issues for parties trying to put in data. We have concerns about the existence of the Portal at all and would therefore rule out methods C and D. The BMRS may be an acceptable way to post data, but we assume for most parties the creation of additional data flows would take longer under this route. EPL suspects that the BMRS may also need some redevelopment in future, for example if Ofgem alters cash-out, which may delay implementation.
IBM UK Ltd for and on behalf of the ScottishPower Group	**Yes** For manual data submission, there would be processes and procedures as well as resourcing impact to take care of the additional activities. For 'automatic' data submission, there would be small internal system impact to take into account of the agreed format and interfaces. The difference in impacts between all the proposed solutions is minimal, though we believe there may be slightly more risk and complication with the Grid Code options.
E.ON	**Yes** As an optional solution, while we could continue to publish our own REMIT submissions separately, we support the initiative to create a central repository for GB REMIT submissions and would choose to use this, albeit conscious that a back-up submission route may be necessary for all parties. Thus it will be necessary to develop the IT functionality to make use of the chosen P291 solution, and capture and store the information published for audit and compliance reporting. Further work may be required to ensure consistency of all data submissions from the short to long-term. Even if we did not intend to submit our own data this way, it would still be necessary to create processes/systems to monitor others' submissions via such a central reporting platform. Using the BMRS would seem to be the simplest option possibly with lower costs to parties to enable this than extending the existing processes for OC2 data submission; however all proposed solutions would require work to facilitate (and in relation to consistency of short and long-term data submissions, we believe Grid Code changes are desirable anyway).
EDF Energy	**Yes**

Respondent	Response
	People: Training will be required for our approved publishers, to access and use the systems developed to submit REMIT information to the platform. Employees who currently review REMIT websites would require training on the changed data publication methods. All methods would require a revision to our current governance processes. Method 3 would have a significant impact on our people. Systems: Reporting systems would be changed to monitor our own reporting and its effectiveness / timeliness. Submission systems would be changed to provide data as required for publication. Reporting systems would be changed to monitor market participant Urgent Market Messages (UMMs). Backup corporate systems would be developed to serve as a publication platform in the event of unavailability of the system. Method 3 would have a significant impact on our systems. Processes: REMIT publication and REMIT data extraction processes would require revision. Method 3 would have a significant impact on our publication and internal control processes. A lead time of at least 4 months is desirable for cost-effective and robust revision of internal processes and systems, and training to use the new reporting Methods 1 or 2. A longer lead time of at least 9 months could be required to use Method 3, dependent on the precise solution, because of the significant changes necessary to existing operational balancing systems and processes for submitting data pursuant to the Grid Code. Use of reporting that would be facilitated by P291 is not mandatory on REMIT participants, therefore individual user implementations do not need to align with central implementation timing. However, there would be clear benefit in a majority of potential data submitters being ready by the time of central implementation. Note that there could be synergies in system and process development with any new or revised requirements concerning submission and publication of data in electricity markets, for example arising from EU Regulation 714/2009 or revisions to it currently in progress. We have not considered here any potential internal cost savings for combined implementation of any such requirements with P291.
SSE plc	**Yes** We anticipate that we will need to undertake a number of changes to our systems, documents and processes as a result of P291 being implemented; although we anticipate these changes to be equal too or less than the changes needed if another, none centralised, reporting system were adopted (but without the associated benefits arising from such a centralised reporting system in terms of clarity and consistency of submissions from all the utilities, all of whom are working to the same definitions/standards).

Question 2: Will your organisation incur any costs in implementing P291?

Responses

Respondent	Response
Centrica	**Yes** Depending on the solution implemented, we may incur system costs to automate any submissions to ensure consistency between Grid Code submissions and those to the reporting platform.
TMA Data Management Ltd	**No**
Drax Power Limited	**Yes** There will be costs associated with amending our internal IT systems (in particular, those systems that interact with EDL) to ensure we are able to utilise any part of the P291 solutions. At this early stage, it is difficult to provide accurate cost information. However, assuming that P291 is implemented at least six months after the Authority's approval, we estimate the total cost to Drax will be approximately £100k. This figure is a one-off cost and is likely to reduce with a longer lead time and increase with a shorter lead time. We would support this change being part of a normal BSC Systems Release.
National Grid	**Yes** As per question 1 the extent of costs is contingent on specific requirements and are therefore approximate high level estimates, in summary: Solution A – No Transmission Company Impact Solution B – No Transmission Company Impact Solution C – £350k Solution D – £350k Solution E – £350k Solution F – £550k plus ongoing operational costs (up to approximately £150k p.a. dependent on requirements)
RWE Supply & Trading GmbH	**Yes** Our significant costs estimates are as follows: Method 1: In excess of £0.5m as one off costs to develop the required data feeds. These costs are irrespective of whether P291 implementation occurs as a normal BSC system release. Method 2: In excess of £0.5m as one off costs to develop the required data feeds. These costs are irrespective of whether P291 implementation occurs as a normal BSC system release. Method 3: Costs less than £0.1m as one off costs to develop the required data feeds. These costs are irrespective of whether P291 implementation occurs as a normal BSC system release.

Respondent	Response
Eggborough Power Limited	**Yes** There will be some minor costs associated with creating new flows based on existing information and submissions. If an entire new system is required to deal with REMIT then the costs will naturally be greater. Assuming the first route, EPL do not expect these to be substantial and we believe would be outweighed by the benefits of having one platform where all REMIT data for the market as a whole can be displayed.
IBM UK Ltd for and on behalf of the ScottishPower Group	**Yes** For manual data submission, we estimated small one off cost (for authorisation, training etc.) and on-going additional resource requirement. For 'automatic' data submission, the one off cost for system changes and set up is not significant (<£10k). Cost difference between all the proposed solutions is minimal. There will be no difference whether the solution is implemented outside or as part of normal Release.
E.ON	**Yes** For creating new screens in a system to submit our own data and view retrieved messages from other parties, we would estimate costs of around £50-60k. Implementation in a normal systems release would be preferable and slightly less costly, but ideally this centralised platform would be operational as soon as possible.
EDF Energy	**Yes** A detailed assessment of cost and timescales would be expensive and time-consuming, particularly while a number of options are possible. We provide approximate provisional estimates here. Costs incurred would include management / oversight costs, training costs and IT development costs. It is not expected that overall costs would exceed £100k, allowing for internal IT build resource to support interfaces and data sourcing (redirection) as well as conversion of existing REMIT website to serve as a back-up for BMRS website in the event of unavailability. Costs associated with a solution including Method 3 would be expected to be double, ie not expected to exceed £200k, reflecting the cost of additional training and development of internal control processes. Unless other changes to affected systems were being made at the same time, there would be no significant difference in costs between implementation within a normal BSC systems release and implementation separately. If other changes to BMRS were being made at the same time, or (separately) changes to Grid Code interfaces under Method 3, there could be some small benefits in aligning with these.

Respondent	Response
	As described in response to question 1, we have not considered potential interactions with other required changes to reporting.
SSE plc	**Yes** We anticipate the one off costs to be primarily associated with IT set up costs and revision of internal systems. In general we would anticipate the cost of implementing outside of the normal BSC System Release to be greater than if it were done as part of such a System Release.

Question 3: How long (from the point of Ofgem approval) would you need to implement P291?

Responses

Respondent	Response
Centrica	**Minimal** This depends on the solution selected but should be minimal given that the reporting platform is voluntary.
TMA Data Management Ltd	**N/A**
Drax Power Limited	**6 Months potentially** At this early stage of Modification development, it is difficult to provide an accurate lead time assessment. However, we currently believe we would require at least six months lead time to implement the required internal changes in a cost effective manner.
National Grid	**February 2015 Release** As outlined in Question 1, the lead-time is primarily driven by the new National Grid EBS system, and the associated change freeze period, which is being introduced in late 2013. P291 would necessitate changes to EBS.
RWE Supply & Trading GmbH	**18 Months for Methods 1 and 2; 6 Months for Method 3** Given the need to develop duplicate systems under both Method 1 and Method 2 we would estimate that our lead time for implementation could be 18-months including testing and trialling. Method 3 could be implemented in 6-months provided that data formats remain he same as our current submissions.
Eggborough Power Limited	**Up to 6 Months** Under the Grid Code route, there is no implementation issue as for EPL these data flows already exist. Were Ofgem to agree a method that requires new data flows we estimate that it would take EPL in the region of 6 months to create new systems and test them between the plant and the new system assuming technical specifications were available.
IBM UK Ltd for and on behalf of the ScottishPower Group	**3 Months** The lead time is needed to prepare, recruit/train additional resource to perform the additional activities and/or make the necessary system changes (including system testing). Difference in lead times between all the proposed solutions is minimal.
E.ON	**3 Months** Implementation outside of a normal BSC release would take several weeks longer, simply through the requirement to obtain a separate budgetary sign-off for the work to be done, in addition to the

Respondent	Response
	subsequent time to actually develop, test and implement the IT solution.
EDF Energy	**4 to 9 Months** People: Training has a lead-time of at least 6 weeks, increasing to 4 months if Method 3 is selected. Internal governance would be completed within a 6-week timeframe. Systems: IT development to support data preparation and verification prior to submission could be completed within 3 months for methods 1 and 2, and 6 months for method 3, depending on progress with National Grid's separate EBS / EDL / EDT upgrades. Unfortunate phasing with this separate ongoing project may incur significant additional delays. Processes: Publication and internal control processes would be developed within a 6 week timeframe. Not unexpectedly, the system development side of this recommendation could become the critical path. This risk would be reduced by good engagement with Industry during development of the proposal, so there is a clear understanding in advance of the proposed solution.
SSE plc	**6 Months** We would anticipate a lead time in the region of six months.

Question 4: Which of the Workgroup's proposed solutions do you believe should be taken forward?

Responses

Respondent	Response
Centrica	**Solution C** Given that the platform is voluntary, it would be a useful exercise to determine how many non-Grid Code participants would be likely to use the reporting platform for REMIT reporting. Until this information has been discovered it would be unwise to progress outside of option C. Options A and B are not compatible with automated reported (i.e. not having to submit most of the same information twice), so we do not support them at this time.
TMA Data Management Ltd	**Solution D** Solution D uses existing data reporting that is relevant to REMIT, ensuring that Parties do not have to submit the same information twice. It also allows ad-hoc submissions.
Drax Power Limited	**All, with preference for Solutions D, E or F** Consideration of the likely costs of different solutions will hopefully be revealed by this consultation exercise. As costs of different solutions become clearer, parties will be better placed to provide more informed opinions on the different solutions presented i.e. weigh up costs and benefits. However, in the absence of cost data, we have a preference for options which incorporate data input via existing submissions made under the Grid Code (OC2, EDL, EDT etc.), in conjunction with a website approach which will allow ad-hoc data submission for those parties that do not currently make submissions under the Grid Code. We have no preference at this stage regarding which website is utilised (Elexon Portal, BMRS website or any other option), provided the chosen solution can be demonstrated to be cost effective. As a result we have a preference to explore in greater detail solutions D, E and F. The reason for our preferences is as follows. At a very high level, the solution must: 1. Eliminate (as far as possible) multiple data entry. Duplication should be avoided to reduce process inefficiencies. 2. The process must be as automated as possible to reduce data submission error. In light of these two principles, we believe that the Grid Code based solutions offer the best means of meeting these principles. OC2 requires too many manual updates to be considered, on its own, a viable solution. The lack of timely updates inherent in the OC2 process is, in our view, unlikely to be compatible with REMIT going forward. This Modification may also result in two sets of visible data, OC2 and BMRS REMIT data, displaying contradictory information.

Respondent	Response
	Therefore we believe changes are likely to be required to the OC2 process in order to ensure compatibility with REMIT. Most simply, what is required is a 2 year forward looking EDL/EDT. To develop this, modifications could be made to EDL, although this could be difficult in practice as different companies may operate different versions of EDL. Alternatively, the OC2 data submission process could be incorporated into the EDL system. We note that National Grid is currently undertaking a large scale update of BM systems. We would be interested in understanding whether modifications to Grid Code submissions could be 'bolted on' to the current update programme to aid cost effectiveness. All Parties (and especially parties not subject to the Grid Code) will need to provide some minimum 'free text' submission to comply with REMIT. Therefore, a website solution will be needed, although we currently have no preference with regards to which website should be chosen to fulfil this function.
National Grid	**Solution D** We believe the publication of GB parties' REMIT information on a central platform (BMRS) would be beneficial in improving transparency and, depending on the solution pursued, potentially better facilitate Applicable BSC Objective C. We believe it is neutral to the other objectives. The full benefits of P291 will only be realised if the most appropriate solution is taken forward we, at this stage, consider Solution D offers the most efficient solution as it maximises the use of existing platforms. We do not support Solution F because of inefficiency; it introduces a requirement for a new system the functionality of which, in other Solutions, is supplied by existing platforms. For example Solution D uses the existing Elexon Portal solution.
RWE Supply & Trading GmbH	**Solution E** Information should be submitted via the Grid Code and BMRS website under approach E. This aligns with the derivation of our current data submissions to our REMIT website.
Eggborough Power Limited	**Solution F** F seems to make best use of the existing data flows, but also the enhancements to accommodate data from non-Grid Code parties.
IBM UK Ltd for and on behalf of the ScottishPower Group	**Solutions A or B** ScottishPower believes that solution A or B would offer the industry the best value and simplest solution, assuming the necessary security and authorisation arrangements are made and that the integrity of the systems is robust. We further believe that there should be a robust automatic data submission 'file upload' arrangement with any solution, to ease the

Respondent	Response
	burden of parties' resource and ensuring synchronisation of information reporting with own website. Also, any automatic upload should contain receipt acknowledgement.
E.ON	**Solution E** We would prefer option E, publishing information via the BMRA website, with the facility that would provide to provide adhoc updates, with the backup solution of extending Grid code 0C2 submissions. The BMRA seems the most logical place for the information to be published and would enable utilising the high grade option via TIBCO to pick up any REMIT information published by other parties. Crucial is the high level of connectivity that the platform must support plus the speed of its data handling and reporting capability.
EDF Energy	**Solution A** Without prejudice to our views on benefits against BSC Objectives, solutions A (Elexon Portal) and B (BMRS website) would be the easiest submission routes for us to implement, and solution A is probably the most cost-effective for participants as a whole. We acknowledge that not all REMIT participants will be readily able to submit information using Grid Code methods (eg. TOGA/EDT/EDL). Therefore if Method 3 were adopted, it seems unlikely that Solution C ("Grid Code") would be acceptable and Solution D, E or F (combinations) might be required. Solutions D, E, F provide multiple methods of submitting information to the portal. With multiple methods of publication comes the risk of duplication, conflicting notifications, or errors. **EDF Energy would only expect to use one method of data submission.** If Method 3 were adopted, we might use it, but given the additional costs we would probably use Method 1 or 2 functionality or the equivalent provided by NGET within the D,E,F solutions. With Method 3 and solution C and potentially solutions D-F, if existing operational interfaces were to be modified, operational staff would need training, and operational processes would need revision to ensure real-time operation is not affected. We generally aim to allow power station staff to focus on operating the plant, particularly at nuclear stations, and existing REMIT publication is co-ordinated and performed centrally. In our experience, some REMIT UMMs relate to market time periods which are outside of station operational planning horizons (e.g. an outage date revision for next year). Publishing these UMMs would require new processes and considerations for all operator staff and enacting them would take them away from their key tasks of safe and efficient management of the asset in real time. Lastly, a risk is introduced that a central trading forecast and an operational outage submission may not reflect the same profile. An additional internal control process working in operational timescales would be required to ensure this did not occur.

Respondent	Response
	EDF Energy does not consider that C is a suitable solution. EDF Energy considers that both of Solutions A, B are suitable and would defer to a cost/benefit analysis of each to determine the pragmatic way forward based on reliability, functionality, accessibility and cost. Given that Method 2 "would add all the required login functionality for submitting information to the BMRS website … require[ing] substantial changes as the BMRS website does not currently have this functionality", **EDF Energy favours Solution A**.
SSE plc	**Solutions C or E** We have considered the Workgroup proposed solutions and have come to two broad conclusions at this stage in terms of taking things forward. Firstly, in terms of the method for submission we would prefer it to be submitted via a single point of entry (on the part of the User) to avoid the risks associated with 'double entry' and that of the three methods outlined on page 6 of the Impact Assessment that the Grid Code Method 3 is our preferred approach. Secondly, in terms of the hybrid solutions, we would prefer, at this stage, the Solution E (Grid Code and BMRS website).

Question 5: Do you believe there are any other possible alternative solutions to P291 that the Workgroup should consider?

Responses

Respondent	Response
Centrica	**No** Not at this point in time – costs should also play an important part in any option taken forward, especially as this is a voluntary platform.
TMA Data Management Ltd	**No**
Drax Power Limited	**No** We believe that all the viable options have been presented in the Impact Assessment Consultation. However, we consider these options will probably evolve as the Modification process continues and note that there may be a requirement to make Modifications to the Grid Code (specifically OC2) in order to preserve the spirit of ACER's guidance (i.e. transparency of data via a (single) national platform).
National Grid	**No**
RWE Supply & Trading GmbH	**No**
Eggborough Power Limited	**No**
IBM UK Ltd for and on behalf of the ScottishPower Group	**No**
E.ON	**Maybe** It should be a goal of the P291 solution both to use "latest" data at all times and to minimise the amount of work of parties to provide the data. Ideally REMIT submissions, the 5-day EDL data and longer-term OC2 view should be knitted together; no-one wants different data on two platforms for the same period. Currently there is an overlap in the Grid Code requirements and REMIT and also a shortfall in the Grid Code that should be removed, where the OC2 mechanism stops, providing availability data at BMU level per day, per week out to 3 yrs, but stopping at 2 working days out, and live data from EDL starts. (As EDL is only designed to send up to 5 days data this may be a restriction, but overlapping OC2 it would need to be decided how/which bit of data was going to have priority). As EDL can go out to 5 days but REMIT is a 24/7 requirement, it would be best if the various information flows could be aligned into a single flow so that parties can see the data in a single place across all time periods. Thus we believe that additional change(s) to the Grid Code are desirable.

Respondent	Response
EDF Energy	**Yes** ACER REMIT Guidance Edition 2 [page 37] precludes companies from sanctions for not reporting, if they publish inside information late due to unavailability of the IT platform used to publish that information. However this preclusion does not permit companies to trade until the information has been published. This is commercially unacceptable to EDF Energy, therefore capability to publish independently would be retained to allow publication in the event of delay in publishing through, or unavailability of, central publication platforms. Given that we and many participants would probably continue to publish on their own websites, or at least retain the capability to do so, it could be efficient to allow, as an alternative, a method for data to be sourced from existing own-company REMIT websites, provided the data fields and format are compatible.
SSE plc	**No** We believe that the Workgroup has identified the potential alternative solutions.

Question 6: Would you like to make any further comments on P291?

Responses

Respondent	Response
Centrica	**No**
TMA Data Management Ltd	**No**
Drax Power Limited	**Yes** We have further views on what data actually needs to be submitted by parties, in particular the data items listed on page 36 of the Impact Assessment. As a high level principle, we believe that data requirements should be kept to a minimum. Such a principle should reduce complexity, and thus the possibility of errors, as well as reduce costs. As such we believe that there is too much unnecessary data being proposed to be submitted, which in some cases is duplicative. Specifically: • The "Participant ID" and "BM Unit" categories seem to be duplicative. Only one seems to be required (i.e. the ID should always be the industry recognised BM Unit identifier for BSC Parties, with non-BSC Parties being assigned a similar, unique identifier by Elexon). • We do not believe that the "Affected Area" category needs to be so specific. Only that the incident has occurred in GB is relevant to market participants. • Prescribing the "Fuel Type" is not relevant to REMIT and is likely to only result in confusion. For example, how is fuel type proscribed for units which may change fuel type in less than 2 years ahead (e.g. coal and biomass)? • We do not believe that the "Event Type" category is required by REMIT. We also do not consider that it provides any useful information to market participants. • The "Duration Category" must be a voluntary field as it can be difficult to provide a meaningful range. The "Event Start and End" categories already provide a best estimate to market participants. Anything further will be duplicative. • The "Cause" field will need to define each of the different causes to ensure consistency across the industry. Finally, we do not believe that REMIT requires a contact person to be provided, as discussed on page 13 of the Impact Assessment.
National Grid	**Yes** There are synergies between some of the information submitted to the BMRS platform under REMIT and the information required under the European Transparency Regulation e.g. Article 15 – Information relating to the unavailability of generation and production units. P291 should ensure that system changes capture requirements for

Respondent	Response
	publication of data for both REMIT and European Transparency requirements.
RWE Supply & Trading GmbH	**No**
Eggborough Power Limited	**No**
IBM UK Ltd for and on behalf of the ScottishPower Group	**Yes** ScottishPower notes that ENTSO-E is required to provide a central information transparency platform, the 'Electricity Market Fundamental Information Platform' (EMFIP), and ACER intends that EMFIP should meet the requirements for a platform publishing REMIT inside information (particularly in the context of generator unavailability). We are therefore concerned that a holistic approach (may be led by Ofgem) has not been taken, as this could mean that system changes and costs incurred for P291 could either be duplicated or become redundant in 2015.
E.ON	**No**
EDF Energy	**Yes** Note that there could be synergies in system and process development with any new or revised requirements concerning submission and publication of data in electricity markets, for example arising from EU Regulation 714/2009 or revisions to it currently in progress. We have not considered here any potential cost savings in combined implementation of any such requirements with P291, but the modification group should consider whether any such interaction exists and, if so, whether combined implementation could have benefits. The benefits of reporting on a central platform should be identified, and some attempt made to quantify them. Given that central reporting is not mandatory, some idea of the likely level of use among participants should be sought, and this will affect the value of central reporting. The cost of central development and operation, and of expected participant development and operation, should be compared with the estimated benefits in deciding whether to support this proposal. If the costs are too high, the proposal should not be supported or approved.
SSE plc	**No** We have nothing further to add at this stage over and above what we set out above (and in the Modification Proposal form).