**Stage 03**: Transmission Company Analysis

# P291 'REMIT Inside Information Reporting Platform for GB Electricity'

## Response Form

The P291 Modification Workgroup requests your impact assessment of P291. In particular, we ask for your responses to the following questions and your reasons for those responses.

## Transmission Company Analysis Questions

### Question 1

Please describe the impact(s) of P291 on your ability as a Transmission Company to discharge your obligations efficiently under the Transmission Licence and to operate an efficient, economical and co-ordinated transmission system. Where applicable, please state any difference in impacts between the Workgroup's proposed solutions.

P291 will not have an impact on National Grid's ability to efficiently discharge our Transmission Licence obligations.

### Question 2

Please outline the impact of P291 on the computer systems and processes of the Transmission Company. Include details of any changes needed as a result of implementing P291, and the lead time required for those changes. Where applicable, please state any difference in impacts between the Workgroup's proposed solutions.

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.

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What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

**Your response**

We invite you to respond to the questions in this form.

**How to return your response**

Please send responses, entitled "P291 Transmission Company Analysis" to **modifications@elexon.co.uk** by **5pm** on **Friday 12 April 2013**.

**Question 2**

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) re-declarations 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**

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

**Question 2**

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 re-declarations. 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 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

**Question 2**

- 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 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.

**Question 3**

Please provide details of any consequential changes to Core Industry Documents and/or the System Operator Transmission Owner Code that would be needed as a result of implementing P291, and the lead time required for those changes. Where applicable, please state any difference in impacts between the Workgroup's proposed solutions.

There would need to be Grid Code changes to cover solution C through to F. The Grid Code associated document BMRS & SAA Interface Specification would also have to be amended. The lead time for these changes would be in the order of 6-9 months.

**Question 4**

Please provide an estimate of development, capital and operating costs in appropriate detail which you as the Transmission Company anticipate that you would incur in implementing P291. Where applicable, please state any difference in costs between the Workgroup's proposed solutions.

As per question 2 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)

**Question 5**

Please outline any potential issues relating to security of supply arising from P291.

There are no security of supply issues arising from P291.

| Question 6 |
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| Please outline your views and rationale on whether P291 would help to achieve the Applicable BSC Objectives. |
| 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.<br><br>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.<br><br>We do not support Solution F due to 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. |

| Question 7 |
| --- |
| Please provide any other comments you may have on P291. |
| 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 publication of data for both REMIT and European Transparency requirements. |

## Further Information

To help us process your response, please:

- Email your completed response form to **modifications@elexon.co.uk**
- Use the following text in the subject line of your email: "P291 Transmission Company Analysis"
- Include a phone number in your covering email, so that we can contact you if we have any questions
- Respond by **5pm** on **Friday 12 April 2013** (the Workgroup may not be able to consider a late response)

The Workgroup will consider your response at its next meeting.