

Stage 03: Draft Solution to Identify Impacts

P291 'REMIT Inside Information Reporting Platform for GB Electricity'

The Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT) is an EU regulation aimed at preventing market abuse in wholesale energy markets. A key requirement is for market participants to publish inside information.

P291 proposes to use the Balancing Mechanism Reporting System (BMRS) as a platform to publish the necessary information to meet the requirements of REMIT inside information reporting for the GB electricity sector.

This Impact Assessment for P291 closes:

5pm on Friday 12 April 2013

The Workgroup may not be able to consider late responses.



High Impact:

- Balancing Mechanism Reporting Agent (BMRA)
- Transmission Company (*Method 3 only*)



Medium Impact:

- BSC Parties



Low Impact:

- ELEXON

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

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About this Document

This document is the Draft Solution to Identify Impacts for P291. It summarises the proposed P291 solution requirements and the changes – to the extent that the P291 Workgroup has been able to identify them – that will be required to participants' systems, BSC Central Systems, Code Subsidiary Documents and Configurable Items to implement each of the proposed P291 solutions.

We are issuing this document for impact assessment by ELEXON, BSC Agents (AM/Dev service provider and BPO/Host service provider), the Transmission Company, BSC Parties and Party Agents in order to establish the impacts, costs and lead times of P291 (including any impacts which are not identified in this document).

Please provide your response using the attached response form (Attachment A). The P291 Workgroup will consider your responses at its next meeting. At this stage the Workgroup is not seeking your views on the pros or cons of P291, as these will be the subject of a subsequent industry consultation.

You can find more details on the scope of this impact assessment in Section 2.

Further Information

You can find further documentation and information on P291 on the [P291](#) page of the ELEXON website.



Any questions?

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Impacts

21 March 2013

Version 1.0

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What is REMIT?

The Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT) is an EU regulation (regulation (EU) No 1227/2011)¹ that came into force on 28 December 2011 and is aimed at preventing market abuse in the wholesale energy markets. It establishes a new framework for the monitoring of wholesale energy markets. A key requirement of this framework is for market participants to publish information that, were it not to be published, would be considered inside information.

The Agency for the Co-operation of Energy Regulators (ACER) recently published the second edition of its non-binding guidance on REMIT² which includes details on the reporting of information that would otherwise be considered inside information. This guidance states that inside information should be disclosed in a manner ensuring that it is capable of being “disseminated to as wide a public as possible”, and suggests that market participants with potential inside information should use centralised platforms for disclosing their information if such platforms exist, although they can also use their own websites. The guidance considers that the use of a transparency platform will decrease the organisational burden on market participants, and that the use of such platforms would allow information to be more accessible to all market participants.

What information is required to be reported under REMIT?

The REMIT regulation does not explicitly set out what should or should not be reported under the regulation. Article 2(1) of the regulation sets out the definition of ‘inside information’ as:

- Information of a precise nature which has not been made public, which relates, directly or indirectly, to one or more wholesale energy products and which, if it were made public, would be likely to significantly affect the prices of those wholesale energy products.

The REMIT regulation further defines ‘information’ as:

- Information relating to the capacity and use of facilities for production, storage, consumption or transmission of electricity or natural gas or related to the capacity and use of LNG facilities, including planned or unplanned availability of these facilities; and
- Information which is required to be disclosed in accordance with legal or regulatory provisions at Union or national level, market rules, contracts or customs on the relevant wholesale energy market, in so far as this information is likely to have a significant effect on the prices of wholesale energy products; and
- Other information that a reasonable market participant would be likely to use as part of the basis of its decision to enter into a transaction relating to, or to issue an order to trade in, a wholesale energy product.

REMIT has been in force since December 2011 with market participants publishing information on a number of individual websites. Generator outage data seems to feature significantly on market participants’ existing publications.

¹ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:326:0001:0016:EN:PDF>

² http://www.acer.europa.eu/remit/Pages/ACER_guidance.aspx



What is...

The issue?

A requirement of REMIT is for participants to publish any inside information. The ACER guidance advocates the use of reporting platforms for this.

The proposed solution?

P291 proposes to introduce a REMIT inside information reporting platform to the BMRS website.



What is inside information?

Article 2(1) of REMIT defines “inside information” as:

- Information of a precise nature;
- Which has not been made public;
- Which relates, directly or indirectly, to one or more wholesale energy products; and
- Which if it were made public, would be likely to significantly affect the price of those wholesale energy products.

ACER’s guidance contains further information on what it currently considers to be covered by the above criteria.

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What is the BMRS?

The Balancing Mechanism Reporting Service (BMRS) is a service for publishing and reporting data relating to the Balancing Mechanism, settlement and the market in general. This includes data provided by National Grid relating to balancing actions and indicative data relating to balancing and settlement, including indicative data for each Settlement Period shortly after its completion. All of the data published on the BMRS is indicative data, calculated from the information available at the time, and is not used within Settlement, but its publication helps to facilitate the operation of the GB electricity market. Market participants can choose to receive the information via a 'high-grade' service, where the information is sent to them directly via a TIBCO feed, or they can use the 'low-grade' service, the BMRS website³. The low-grade service is freely available to anyone.

In a similar fashion to the data currently published on the BMRS, inside information would not be used in Settlement, but would help to facilitate the operation of the market. In addition, its publication would enable the Industry to align with the most recent ACER guidance, which expresses a preference for using reporting platforms to publish potential inside information in a place freely accessible to anyone.

What problem does P291 identify with the current arrangements?

National Grid has recently launched a REMIT transparency platform for the GB gas market⁴, but there is currently no such platform in place for the GB electricity market. The Proposer considers that the BMRS would be the most suitable place for a platform.

The BMRS has grown and evolved into an electricity data reporting tool, even where the data is not directly used in Settlement. This combined with ACER's preference to use existing industry reporting platforms for publication of potential REMIT inside information makes the BMRS a logical reporting mechanism for displaying the required information. Activities of the Balancing Mechanism Reporting Agent (BMRA) and functionality of the BMRS are specified under the BSC. Therefore, in order to allow REMIT inside information to be published on the BMRS website the BSC must be amended accordingly.

The BSC Modification process will provide a path by which to define the platform requirements as well as ensuring the platform meets the REMIT requirements and ACER guidance. This will include aligning with the guidance with what should be published on the platform and how the platform should operate.

What is the proposed solution?

P291 proposes to amend the BSC to allow a REMIT inside information reporting platform to be introduced on to the BMRS website. This will enable the publication of necessary information for market participants to meet the requirements of REMIT inside information reporting for the GB electricity market, as well as establishing expected standards and methods for the input and reporting of such data. Code changes will be required to obligate the BMRA to provide the service and set out who can submit data, how they will do so, and how it will be reported.

In the absence of a central inside information reporting platform, BSC Parties (and others participants within the electricity industry) have to comply with the REMIT requirements by

³ <http://www.bmreports.com/>

⁴ <https://www.remit.gb.net/>

reporting potential inside information on their own websites (or by other reporting channels, for example social media) which makes it difficult to locate all the published information. Publishing potential inside information reported by market participants on a single platform will make it easier to locate. Furthermore, this will also align GB practices with the most recent version of the non-binding ACER guidance on REMIT, which expresses a preference for reporting potential inside information on central platforms where these exist.

REMIT data reported on the BMRS will not be used in Settlement, but reporting the information in this way will help facilitate the wholesale electricity trading market by providing near to real-time reporting and historic market information. An additional benefit of reporting this data under BSC governance is that the BSC Modification process will allow a Workgroup to define the platform requirements. This will ensure that the transparency platform meets the REMIT requirements and aligns with the ACER guidance, including what should be published, how the platform should operate, what IT standards it should adhere to, and meeting the reporting and data storage requirements.

2 Summary of Impact Assessment Requirements

The Workgroup is currently considering six potential solutions for P291. This section provides an overview of the proposed solutions, the likely impacts and what information is sought by this impact assessment. Detailed solution requirements and impacts can be found in the subsequent sections.

What methods for submitting potential inside information are the Workgroup considering?

The Workgroup is currently considering three potential approaches for participants to submit their potential inside information to the BMRS for P291. However, the Workgroup agrees that in all cases the information, once submitted, would be published on the BMRS website.

The three possible methods identified by the Workgroup for allowing participants to submit potential inside information are:

- **Method 1:** Information is submitted via the ELEXON Portal;
- **Method 2:** Information is submitted via the BMRS website; and
- **Method 3:** Information is submitted via the Grid Code.

The Workgroup is considering six potential combinations of these core methods as solutions to P291. The remainder of this section provides an overview of the above three core methods for submitting potential inside information. The six possible solutions to P291 are detailed later on in this Section 2.

Method 1: Information is submitted via the ELEXON Portal

This method would make use of the existing login functionality of the ELEXON Portal. Participants would log in to their Portal account and would be able to submit information from there. Additional security and authorisations would need to be added, and some members of the Workgroup have concerns about the integrity of the Portal.

Method 2: Information is submitted via the BMRS website

This method would add all the required login functionality for submitting information to the BMRS website. This would require substantial changes as the BMRS website does not currently have this functionality.

Method 3: Information is submitted via the Grid Code

This method would make use of:

- The existing submission of generator outage information that participants are required to make to the Transmission Company under Section OC2 of the Grid Code; and

- The existing submission of short terms Physical Notification (PN) and Maximum Export/Import Limit (MEL/MIL) re-declarations (not captured under OC2 data) that participants are required to make to the Transmission Company under Sections BC1 and BC2 of the Grid Code.

However, not all participants subject to REMIT are also subject to the Grid Code, or the BSC. Some Workgroup members therefore consider that, for these participants, an alternative method of submission would be required, achieved through either Method 1 or 2 (which would also be available to participants who are subject to the Grid Code). The alternative methods could also be used to submit information that falls outside the scope of data submitted to the Transmission Company, and to update information originally submitted to the Transmission Company (e.g. as the status of a declared incident changes).

Common requirements: Information is published on the BMRS website

Under all three methods, inside information would be published on the BMRS website once received, and would be published as soon after submission as possible, both on the website and through TIBCO broadcast messages. This information would be freely available to view by any visitor to the website, and would remain available on the BMRS for a period of three years following submission. Historic messages would also be available to download in daily .csv format files.

Detailed requirements for the proposed Methods

The detailed requirements for each of the above methodologies are documented separately in Sections 3-5. In each case, the requirements have been categorised into the following six areas:

1. User Management & Security
2. User Interface & Data Provision
3. Publication & Reporting
4. Audit Trail
5. Support
6. Non-functional Requirements

When considering the requirements for P291, the Workgroup has considered the Nord Pool Spot reporting platform⁵ to be a good example to follow. This platform has also been highlighted within the ACER guidance as the best example to follow. Many of the requirements for the proposed BMRS platform have subsequently been based on this platform.

⁵ <http://www.nordpoolspot.com/Message-center-container/UMM-List/>

What are the possible solutions for P291?

The Workgroup is currently considering six possible solutions to P291.

Individual solutions

There are three 'individual' solutions for P291, as follows:

- **Solution A:** Method 1 only (information submitted exclusively via ELEXON Portal)
- **Solution B:** Method 2 only (information submitted exclusively via BMRS website)
- **Solution C:** Method 3 only (information submitted exclusively via Grid Code)

The detailed requirements for each method are documented separately in Sections 3-5 of this document.

Hybrid solutions

Some Workgroup members consider that Method 3 would need to be implemented alongside either Method 1 or Method 2, as only Parties with a relationship with the Transmission Company and subject to the Grid Code (generators and Interconnector owners, who are required to submit outage, PN or MEL/MIL information to the Transmission Company) would be able to submit information via existing Grid Code routes. This gives rise to two further possible solutions for P291, as follows:

- **Solution D:** Method 3 with Method 1 (information submitted via Grid Code and ELEXON Portal)
- **Solution E:** Method 3 with Method 2 (information submitted via Grid Code and BMRS website)

The detailed requirements for these solutions are not separately documented, but are the same as the detailed requirements of each of the relevant individual methods combined. You should therefore merge the relevant sets of requirements from Sections 3-5 as appropriate when assessing these hybrid solutions (e.g. for Solution D, consider the impact of the implementation of both the Method 1 and Method 3 requirements together). Please note that requirements that are common to all three methods are marked.

Finally, some Workgroup members consider the possibility of a solution where the Transmission Company also provides functionality akin to Methods 1 and 2 above, for submission of information in addition to Method 3. This gives rise to one further possible solution for P291, as follows:

- **Solution F:** Method 3 and Transmission Company functionality akin to Methods 1 and 2⁶

The detailed requirements for this solution are not separately covered in this document. The Transmission Company should adopt the requirements of either Method 1 or 2 as appropriate for the purpose of assessing a solution. We anticipate that the impact on the BSC Application Management and Development (AM/Dev) and Business Process Outsourcing/Host (BPO/Host) service providers for publication of information on the BMRS

⁶ The Workgroup considered that Solution F could be taken forward without BMRS reporting, i.e. with reporting by National Grid instead, but this would be entirely outside the BSC and therefore could not be a solution under P291.

should be the same for Solution F as for Solution C; however, we seek confirmation and the corresponding costs and lead time should this not be the case.

Summary of solutions

The six possible solutions for submitting the information to the BMRS are summarised in the table below:

Summary of Inside Information Submission Routes under each Solution						
Inside information is submitted...	A	B	C	D	E	F
Via the ELEXON Portal	✓			✓		
Via the BMRS website		✓			✓	
Via existing submissions made under the Grid Code			✓	✓	✓	✓
Via Transmission Company functionality akin to the Portal/BMRS routes						✓

Please note that it would not be possible to submit 'ad-hoc' data under Solution C, as participants would only be able to submit information via existing Grid Code submission routes (i.e. information relating to outages or PN and MEL/MIL re-declarations). All other solutions would offer a route for submitting 'ad-hoc' information.

Who is likely to be impacted by P291?

The proposed solutions to P291 will impact the following participants in the BSC arrangements:

- The **Transmission Company**, who would need to make changes to the Grid Code and the relevant data submission forms, flows, systems or web platforms in order to implement Method 3 for Solutions C-F. Solution F would also require the Transmission Company to create an online form platform akin to Methods 1 and 2. Solutions A and B should not impact the Transmission Company;
- **BSC Parties and Party Agents**, who may wish to use the chosen data submission method and the reported data. There could be mandatory impacts under Method 3 (Solutions C-F) for participants submitting data in accordance with the Grid Code. Parties may also wish to align or develop automated data submission processes in line with the solution requirements should they wish, to allow their submissions to the BMRS to be simultaneously reported on their own website, although this is optional;
- **ELEXON**, who would need to amend the relevant BSC documentation and manage the implementation of P291, as well as administration associated with the solutions, e.g. registration and authentication processes; and
- **BSC Agents** (specifically the Balancing Mechanism Reporting Agent (BMRA)). We anticipate that the main impacts would be on the AM/Dev service provider, who would need to design and implement the online form data submission method (Methods 1 and 2 only), the BMRS reporting platform and any automated data submission aspects. We expect the impact on the BPO/Host service provider to be limited to document changes and testing, and management of the information

submission methods following implementation. However, we seek confirmation of this through this impact assessment.

The potential impacts of each Solution on market participants is summarised below (ELEXON has not been included as it would be impacted under all Solutions):

Summary of Likely Impacts on Market Participants under each Solution			
Sol'n	Transmission Company	BSC Agents	BSC Parties & Party Agents
A	No impact	Submission impact Reporting impact	Optional impact (automated data submission)
B	No impact	Submission impact Reporting impact	Optional impact (automated data submission)
C	Grid Code impact	Reporting impact	Possible impact (Grid Code) Optional impact (automated data submission)
D	Grid Code impact	Submission impact Reporting impact	Possible impact (Grid Code) Optional impact (automated data submission)
E	Grid Code impact	Submission impact Reporting impact	Possible impact (Grid Code) Optional impact (automated data submission)
F	Grid Code impact Impact of developing sol'n akin to Method 1/2	Reporting impact	Possible impact (Grid Code) Optional impact (automated data submission)

What else is likely to be impacted by P291?

The proposed solution will require changes to the BSC (particularly Sections Q and V), and will require changes to BMRA System Documentation. Method 3 would also require changes to the Grid Code. For the purposes of this Impact Assessment, you should assume that the changes to the BSC will be drafted by the Workgroup, consulted on and agreed by the Panel as part of the P291 progression process before the Modification is sent to Ofgem for decision. Any other impacted documents will be amended following Ofgem's approval of P291.

You can find a full list of the likely impacts in Section 6. Please highlight in your response if you believe there are any additional impacts not identified in this Draft Solution.

What does this impact assessment seek?

This impact assessment seeks to identify the full impacts of the P291 solution on affected participants, including the following:

- The changes which participants would need to make to systems, documents and/or processes (including any not identified in this document) to implement the requirements of each proposed solution;
- The implementation effort/costs which participants would incur in making these changes; and
- The lead times (from the point of Ofgem approving P291) that participants would need to make these changes.

Where applicable, we seek separate information on the costs and lead time for all proposed solutions. Respondents to the industry impact assessment should respond using the accompanying impact assessment form.

The Workgroup also welcomes your views on which of the proposed data submission methods and solution approaches you prefer, and whether you believe there are any other potential solutions that the Workgroup should consider. At this stage the Workgroup is not seeking your views on the pros or cons of P291, as these will be the subject of the Workgroup's subsequent Assessment Procedure Consultation.

3 Detailed Solution Requirements – Method 1

Solution requirements for submission Method 1 (ELEXON Portal)

The Workgroup has identified the following solution requirements for Method 1 (information is submitted via the ELEXON Portal).

For Solution D (Method 3 with Method 1), the requirements for Method 3 (see Section 5) should be merged with these requirements. For Solution F (Method 3 and Transmission Company functionality akin to Methods 1 and 2), the Transmission Company should adopt the relevant requirements from either this section or Section 4 (Method 2), and these should be merged with the requirements in Section 5 (Method 3). Common requirements are marked with an asterisk.

For the purpose of this document, 'participant' refers to any industry participant who may be required to submit inside information (irrespective of whether they are a BSC Party or not).

User Management & Security	
Ref	Requirement
General	
1.1.01*	All visitors to the BMRS platform will have free access to view all messages and will have free access to download historic messages.
1.1.02*	It will not be mandatory for participants to submit inside information to the BMRS. Participants can elect to continue to use other locations (e.g. their own websites).
1.1.03*	All information will be uploaded to the ELEXON Portal and passed to the BMRS through a secure server.
Requesting ability to submit inside information	
1.1.04	Participants (BSC Parties and non-BSC Parties) who wish to submit inside information will need to manually request the ability to do so via their ELEXON Portal account. As part of this, they will need to state the organisation(s) that they will be submitting information for. If they are BSC Parties, they will need to provide their BSC Party IDs as part of this.
1.1.05	Participants will be required to provide confirmation from their local security officer that they are eligible to publish messages on behalf of the organisation. For BSC Parties, a Category A Authorised Signatory under BSCP38 would be deemed to fulfil this role.
1.1.06	The BMRA (BPO/Host service provider) will validate this request. If the request is rejected, the BMRA will inform the participant of the reason for rejection. The participant may then resubmit their request once the issues have been resolved.
1.1.07	If the participant is seeking to report on behalf of a non-BSC Party then a REMIT ID will be allocated for the organisation if one does not already exist. BSC Parties will use their BSC Party IDs for this purpose.
1.1.08	Once registered, participants will need to log in to their Portal account in order to submit information.

User Management & Security	
Ref	Requirement
Organisation contact details	
1.1.09	Each organisation will be required to provide contact details for publication on the BMRS. This will enable other participants with queries to contact the organisation.
Registering assets	
1.1.10	Registered participants will be assigned the permissions to register assets belonging to the organisation, submit inside information relating to the organisation's registered assets and assign particular assets to other participants to submit inside information for.
1.1.11	Registered participants will only be able to register assets that belong to their organisations. Some of this data may not be available in BSC central systems but is likely to be recorded with the Transmission Company (for example power stations or large consumption sites embedded into a Supplier BM Unit); therefore the ability to interrogate the relevant Transmission Company databases will be required.
1.1.12	Where necessary, participants should agree between themselves who should report information for a particular asset (for example an embedded generator and the Supplier whose Supplier BM Unit they are embedded into).
Reporting limited to own organisation	
1.1.13	Registered participants will only be able to submit information relating to their organisation, and will only be able to report for assets registered under that organisation.
Extending authorisation to nominated participants	
1.1.14	Registered participants will be able to extend authorisation to report inside information to other members of their organisation ('nominated participant') (for example responsibility for assets relating to a particular power station could be extended to the relevant shift managers). It will be the responsibility of participants to avoid inadvertent multiple submissions for the same event.
1.1.15	To extend authorisation for an asset, the registered participant must submit the email address used to create the nominated participant's ELEXON Portal account, the relevant asset(s) and confirmation from their local security officer that the nominated participant is eligible to submit inside information for the nominated asset(s).
1.1.16	The BMRA (BPO/Host service provider) will validate this request. If the request is rejected, the BMRA will inform the registered participant of the reason for rejection. The registered participant may then resubmit their request once the issues have been resolved.
1.1.17	A nominated participant may only update the registered details and submit inside information for the nominated asset(s) and cannot register new assets against the organisation. The addition of new assets to a nominated participant must be done by a registered participant.
Change of asset ownership	
1.1.18	If an asset changes ownership, the old organisation will be able to deregister the asset from their list of assets. The new organisation must manually register the asset themselves if they wish to report information against it.

User Management & Security

Ref	Requirement
1.1.19	The BMRA (BPO/Host service provider) will automatically deregister assets from a participant if it is aware of a change of ownership (e.g. through a Change of BM Unit Lead Party (CoBLP) request) or if the relevant BM Unit is deregistered. If this happens, it will notify all participants who were eligible to report on that asset that it has been deregistered from their organisation.
1.1.20	ELEXON or the BMRA (BPO/Host service provider) will monitor registrations to ensure that an asset that has already been registered is not registered again to the same or a separate organisation. Where this is the case, they will contact the organisations to confirm which organisation should be reporting on that asset. They will deregister the asset from the other organisation, and will notify all participants who were eligible to report on that asset of this.

User Interface & Data Provision

Ref	Requirement
Inside information reporting section on ELEXON Portal	
1.2.01	A section or sections will be added to the ELEXON Portal to cover all aspects of submitting inside information. This section shall contain the relevant disclaimers, which shall be sited in an obvious position (such as the first applicable landing page).
1.2.02	Participants who have not registered to submit inside information will only be presented with the option to register for this ability. Participants who have successfully registered will be able to submit messages and, if applicable, register assets. Participants must be logged in to their Portal account in order to be able to access any of these options.
Registration of assets	
1.2.03	The Portal will allow registered participants to register assets belonging to their organisation. They will be presented with an online form to fill in with the relevant details. The details of this online form can be found in Appendix 1.
1.2.04	Once an asset has been registered, any member of the organisation who is eligible to report on that asset can edit the underlying details of that asset as required.
1.2.05	Underlying information on assets is used solely to pre-populate any messages relating to that asset.
Submission of a message	
1.2.06	The Portal will allow registered participants to submit inside information messages. They will be presented with an online form to fill in with the relevant details. Full details of this online form can be found in Appendix 1.
1.2.07	The 'organisation' and 'asset' fields will be drop-down menus where the participant will be presented only with the organisation(s) and asset(s) for which they are eligible to report against.
1.2.08	A participant can only report on one asset per message. However, the participant will be able to select multiple assets on the online form. A separate message will be published for each asset, with the remaining information in the form identical in each case.

User Interface & Data Provision	
Ref	Requirement
1.2.09	Some fields in the form may need to change slightly depending on the asset type (e.g. generation, consumption, transmission, distribution) (see Appendix 1 for more information on the fields). These fields will be automatically updated when an asset is chosen by the participant.
1.2.10	When a participant selects a particular asset, the relevant fields in the online form will be automatically populated with the details that have been pre-recorded against that asset.
1.2.11	A participant will be able to save a message as a draft and return to it later.
1.2.12	Once a participant completes the form, a validation will be carried out to ensure all fields are correctly filled in and all mandatory fields have been populated. If this check is failed, the participant will be notified.
1.2.13	A participant will be required to preview their message before it is published, and can return to the online form to make edits if required.
1.2.14	Once a participant has published a message they cannot edit it. The participant would instead need to submit a 'follow-up' message containing the amended information.
Message groups and follow-up messages	
1.2.15*	An original message and any follow-up messages stemming from that will form a 'group'.
1.2.16	A participant will be able to view their organisation's message history, arranged by group. Against the latest message in each group will be the option to 'follow-up'.
1.2.17	If 'follow-up' is selected, the participant will be presented with the online form pre-populated with the details of the previous message in the group. The participant can then edit the relevant fields.
1.2.18*	A 'follow-up' message is published in the same way as a new message, except that any amended fields will be highlighted and the notice 'follow-up' will be shown at the top of the message.
1.2.19	If the participant submitted multiple assets in the original message, the option to follow all the messages up simultaneously will be available. Participants will be able to submit follow-up messages for individual assets within the set, which would not disrupt the ability to then submit a follow-up message across the entire set of assets.
1.2.20*	Each message in a group of two or more messages will have a list at the bottom of the message of all messages in the group (including the currently viewed message). Each entry will act as a hyperlink to the respective message (which will open in the same browser tab).
Automated data submission	
-	<i>The P291 Workgroup requests that the AM/Dev and BPO/Host service providers provide cost and lead times for the relevant solutions with and without the below requirements 1.2.21 to 1.2.24.</i>
1.2.21	Registered participants will be able to set up an automated data entry facility which will allow automated system-to-system interfaces such as web services. Such web services should be secure and an appropriate authentication mechanism should be in place.

User Interface & Data Provision

Ref	Requirement
1.2.22	This facility should allow participants to automatically publish messages submitted via the ELEXON Portal on their own websites simultaneously with publication on the BMRS.
1.2.23	The facility for participants to submit messages from their own systems to the BMRS should also be explored, although such a methodology must provide all the information required through the ELEXON Portal submission method.
1.2.24	The BPO/Host service provider will be required to validate any requests for system-to-system interfaces before such a connection is established.

Publication & Reporting

Ref	Requirement
Publication of messages on BMRS	
1.3.01*	A new heading will be added to the navigation tab at the top of BMRS webpages entitled 'Urgent Market Messages'. All aspects of the REMIT inside information platform will sit under and be reached through this tab.
1.3.02*	Selecting the 'Urgent Market Messages' option on the navigation tab will take the user to the reporting platform summary page. This section shall contain the relevant disclaimers, which shall be sited in an obvious position (such as the first applicable landing page).
1.3.03*	The summary page will contain a list summarising all messages that have been published. The list will contain the title of each message and the date and time of publication. The list will be arranged in reverse chronological order (i.e. newest at top).
1.3.04*	The title of each message in the list will act as a hyperlink to the detailed message. Clicking this link will open the message in a new browser tab.
1.3.05*	An example of the detailed message tab can be found in Appendix 2.
1.3.06*	A message will be published on the BMRS immediately once submitted by the participant.
1.3.07*	The message summary page and all individual messages will be freely available to view by any visitor to the BMRS website.
1.3.08*	The message summary page will contain automatic refresh functionality to allow new messages to appear on the messages webpage without the user having to manually refresh the webpage periodically. This automatic refresh will be triggered by the submission of a new message.
1.3.09	The platform will contain a page listing all organisations that have registered to submit information via the ELEXON Portal. This list will contain the contact details supplied by the organisation.
1.3.10*	The platform will include search functionality that will allow visitors to search through published messages. This will allow visitors to filter messages by particular key fields (such as participant or asset).
Historic messages in .csv file format	
1.3.11*	At the end of each calendar day, a .csv format file will be generated containing all the messages published in that calendar day. This will be published on the BMRS and on the ELEXON Portal.

Publication & Reporting

Ref	Requirement
High grade service	
1.3.12*	BSC Parties that have subscribed to the 'high grade' service will be able to receive inside information messages through the TIBCO feed, in the same way as other data from the BMRA.

Audit Trail

Ref	Requirement
1.4.01*	The BMRS will be required to display messages for three years following publication.
1.4.02*	The BMRS and ELEXON Portal will be required to make historic message files available to download for three years following the relevant calendar date.
1.4.03*	All messages will be archived, and will be available to participants upon request.
1.4.04*	The individual participant that submitted a message will also be recorded; however this information will not be included as part of messages or provided as part of historic message requests.
1.4.05*	The BMRS will contain functionality that will allow messages to be reported to Ofgem and ACER. This should include the ability to report data for specific organisations, assets etc.

Support

Ref	Requirement
1.5.01*	All customer queries and historic message requests will be handled through the BSC Service Desk.
1.5.02*	The 'Help' section of the BMRS will be updated to provide support and instructions on all aspects of the REMIT inside information reporting platform. Guidance on submitting messages will also be available on the ELEXON Portal.

Non-functional Requirements

Ref	Requirement
1.6.01*	Messages will be displayed publicly for three years following initial publication. All messages will be stored in archive indefinitely.
1.6.02*	The reporting platform should be available at all times for participants to view. SLAs around availability should be aligned with existing BMRS availability SLAs.
1.6.03	The ELEXON Portal should be available at all times for participants to submit information. SLAs around availability should be aligned with existing Portal availability SLAs.
1.6.04*	Disaster Recovery procedures should be aligned with existing practice.
1.6.05*	Messages should be published on the BMRS as soon as possible after submission by the participant. Publication should be immediate, but any lag time due to system constraints should be no longer than two minutes.

4 Detailed Solution Requirements – Method 2

Solution requirements for submission Method 2 (BMRS website)

The Workgroup has identified the following solution requirements for Method 2 (information is submitted via the BMRS website).

For Solution E (Method 3 with Method 2), the requirements for Method 3 (see Section 5) should be merged with these requirements. For Solution F (Method 3 and Transmission Company functionality akin to Methods 1 and 2), the Transmission Company should adopt the relevant requirements from either this section or Section 3 (Method 1), and these should be merged with the requirements in Section 5 (Method 3). Common requirements are marked with an asterisk.

For the purpose of this document, 'participant' refers to any industry participant who may be required to submit inside information (irrespective of whether they are a BSC Party or not).

User Management & Security	
Ref	Requirement
General	
2.1.01*	All visitors to the BMRS platform will have free access to view all messages and will have free access to download historic messages.
2.1.02*	It will not be mandatory for participants to submit inside information to the BMRS. Participants can elect to continue to use other locations (e.g. their own websites).
2.1.03*	All information will be uploaded to the BMRS through a secure server.
Requesting ability to submit inside information	
2.1.04	Participants (BSC Parties and non-BSC Parties) who wish to submit inside information will need to create an inside information reporting account on the BMRS website. As part of this, they will need to state the organisation(s) that they will be submitting information for. If they are BSC Parties, they will need to provide their BSC Party IDs as part of this.
2.1.05	Participants will be required to provide confirmation from their local security officer that they are eligible to publish messages on behalf of the organisation. For BSC Parties, a Category A Authorised Signatory under BSCP38 would be deemed to fulfil this role.
2.1.06	The BMRA (BPO/Host service provider) will validate this request. If the request is rejected, the BMRA will inform the participant of the reason for rejection. The participant may then resubmit their request once the issues have been resolved.
2.1.07	If the participant is seeking to report on behalf of a non-BSC Party then a REMIT ID will be allocated for the organisation if one does not already exist. BSC Parties will use their BSC Party IDs for this purpose.
2.1.08	Once registered, participants will need to log in to their BMRS account in order to submit information.

User Management & Security	
Ref	Requirement
Organisation contact details	
2.1.09	Each organisation will be required to provide contact details for publication on the BMRS. This will enable other participants with queries to contact the organisation.
Registering assets	
2.1.10	Registered participants will be assigned the permissions to register assets belonging to the organisation, submit inside information relating to the organisation's registered assets and assign particular assets to other participants to submit inside information for.
2.1.11	Registered participants will only be able to register assets that belong to their organisations. Some of this data may not be available in BSC central systems but is likely to be recorded with the Transmission Company (for example power stations or large consumption sites embedded into a Supplier BM Unit); therefore the ability to interrogate the relevant Transmission Company databases will be required.
2.1.12	Where necessary, participants should agree between themselves who should report information for a particular asset (for example an embedded generator and the Supplier whose Supplier BM Unit they are embedded into).
Reporting limited to own organisation	
2.1.13	Registered participants will only be able to submit information relating to their organisation, and will only be able to report for assets registered under that organisation.
Extending authorisation to nominated participants	
2.1.14	Registered participants will be able to extend authorisation to report inside information to other members of their organisation ('nominated participant') (for example responsibility for assets relating to a particular power station could be extended to the relevant shift managers). It will be the responsibility of participants to avoid inadvertent multiple submissions for the same event.
2.1.15	To extend authorisation for an asset, the registered participant must submit the email address used to create the nominated participant's BMRS account, the relevant asset(s) and confirmation from their local security officer that the nominated participant is eligible to submit inside information for the nominated asset(s).
2.1.16	The BMRA (BPO/Host service provider) will validate this request. If the request is rejected, the BMRA will inform the registered participant of the reason for rejection. The registered participant may then resubmit their request once the issues have been resolved.
2.1.17	A nominated participant may only update the registered details and submit inside information for the nominated asset(s) and cannot register new assets against the organisation. The addition of new assets to a nominated participant must be done by a registered participant.
Change of asset ownership	
2.1.18	If an asset changes ownership, the old organisation will be able to deregister the asset from their list of assets. The new organisation must manually register the asset themselves if they wish to report information against it.

User Management & Security

Ref	Requirement
2.1.19	The BMRA (BPO/Host service provider) will automatically deregister assets from a participant if it is aware of a change of ownership (e.g. through a Change of BM Unit Lead Party (CoBLP) request) or if the relevant BM Unit is deregistered. If this happens, it will notify all participants who were eligible to report on that asset that it has been deregistered from their organisation.
2.1.20	ELEXON or the BMRA (BPO/Host service provider) will monitor registrations to ensure that an asset that has already been registered is not registered again to the same or a separate organisation. Where this is the case, they will contact the organisations to confirm which organisation should be reporting on that asset. They will deregister the asset from the other organisation, and will notify all participants who were eligible to report on that asset of this.

User Interface & Data Provision

Ref	Requirement
Inside information reporting section on BMRS	
2.2.01	A section will be added to the BMRS to cover all aspects of submitting inside information. This will sit under the 'Urgent Market Messages' tab of the navigation bar. This section shall contain the relevant disclaimers, which shall be sited in an obvious position (such as the first applicable landing page).
2.2.02	Login functionality will need to be introduced to the BMRS to allow participants to submit inside information. Participants would log in to their account using a username (an email address) and a password.
2.2.03	Participants who have not registered for an account will only be presented with the option to register for one. Participants who have successfully registered will be able to log in, from where they will be able to submit messages and, if applicable, register assets. Participants must be logged in to their BMRS account in order to be able to access any of these options.
Registration of assets	
2.2.04	The BMRS will allow registered participants to register assets belonging to their organisation. They will be presented with an online form to fill in with the relevant details. The details of this online form can be found in Appendix 1.
2.2.05	Once an asset has been registered, any member of the organisation who is eligible to report on that asset can edit the underlying details of that asset as required.
2.2.06	Underlying information on assets is used solely to pre-populate any messages relating to that asset.
Submission of a message	
2.2.07	The BMRS will allow registered participants to submit inside information messages. They will be presented with an online form to fill in with the relevant details. Full details of this online form can be found in Appendix 1.
2.2.08	The 'organisation' and 'asset' fields will be drop-down menus where the participant will be presented only with the organisation(s) and assets for which they are eligible to report against.

User Interface & Data Provision	
Ref	Requirement
2.2.09	A participant can only report on one asset per message. However, the participant will be able to select multiple assets on the online form. A separate message will be published for each asset, with the remaining information in the form identical in each case.
2.2.10	Some fields in the form may need to change slightly depending on the asset type (e.g. generation, consumption, transmission, distribution) (see Appendix 1 for more information on the fields). These fields will be automatically updated when an asset is chosen by the participant.
2.2.11	When a participant selects a particular asset, the relevant fields in the online form will be automatically populated with the details that have been pre-recorded against that asset.
2.2.12	A participant will be able to save a message as a draft and return to it later.
2.2.13	Once a participant completes the form, a validation will be carried out to ensure all fields are correctly filled in and all mandatory fields have been populated. If this check is failed, the participant will be notified.
2.2.14	A participant will be required to preview their message before it is published, and can return to the online form to make edits if required.
2.2.15	Once a participant has published a message they cannot edit it. The participant would instead need to submit a 'follow-up' message containing the amended information.
Message groups and follow-up messages	
2.2.16*	An original message and any follow-up messages stemming from that will form a 'group'.
2.2.17	A participant will be able to view their organisation's message history, arranged by group. Against the latest message in each group will be the option to 'follow-up'.
2.2.18	If 'follow-up' is selected, the participant will be presented with the online form pre-populated with the details of the previous message in the group. The participant can then edit the relevant fields.
2.2.19*	A 'follow-up' message is published in the same way as a new message, except that any amended fields will be highlighted and the notice 'follow-up' will be shown at the top of the message.
2.2.20	If the participant submitted multiple assets in the original message, the option to follow all the messages up simultaneously will be available. Participants will be able to submit follow-up messages for individual assets within the set, which would not disrupt the ability to then submit a follow-up message across the entire set of assets.
2.2.21*	Each message in a group of two or more messages will have a list at the bottom of the message of all messages in the group (including the currently viewed message). Each entry will act as a hyperlink to the respective message (which will open in the same browser tab).
Automated data submission	
-	<i>The P291 Workgroup requests that the AM/Dev and BPO/Host service providers provide cost and lead times for the relevant solutions with and without the below requirements 2.2.22 to 2.2.25.</i>

User Interface & Data Provision

Ref	Requirement
2.2.22	Registered participants will be able to set up an automated data entry facility which will allow automated system-to-system interfaces such as web services. Such web services should be secure and an appropriate authentication mechanism should be in place.
2.2.23	This facility should allow participants to automatically publish messages submitted via the BMRS on their own websites simultaneously with publication on the BMRS.
2.2.24	The facility for participants to submit messages from their own systems to the BMRS should also be explored, although such a methodology must provide all the information required through the BMRS website submission method.
2.2.25	The BPO/Host service provider will be required to validate any requests for system-to-system interfaces before such a connection is established.

Publication & Reporting

Ref	Requirement
Publication of messages on BMRS	
2.3.01*	A new heading will be added to the navigation tab at the top of BMRS webpages entitled 'Urgent Market Messages'. All aspects of the REMIT inside information platform will sit under and be reached through this tab.
2.3.02*	Selecting the 'Urgent Market Messages' option on the navigation tab will take the user to the reporting platform summary page. This section shall contain the relevant disclaimers, which shall be sited in an obvious position (such as the first applicable landing page).
2.3.03*	The summary page will contain a list summarising all messages that have been published. The list will contain the title of each message and the date and time of publication. The list will be arranged in reverse chronological order (i.e. newest at top).
2.3.04*	The title of each message in the list will act as a hyperlink to the detailed message. Clicking this link will open the message in a new browser tab.
2.3.05*	An example of the detailed message tab can be found in Appendix 2.
2.3.06*	A message will be published on the BMRS immediately once submitted by the participant.
2.3.07*	The message summary page and all individual messages will be freely available to view by any visitor to the BMRS website.
2.3.08*	The message summary page will contain automatic refresh functionality to allow new messages to appear on the messages webpage without the user having to manually refresh the webpage periodically. This automatic refresh will be triggered by the submission of a new message.
2.3.09	The platform will contain a page listing all organisations that have registered to submit information via the BMRS website. This list will contain the contact details supplied by the organisation.
2.3.10*	The platform will include search functionality that will allow visitors to search through published messages. This will allow visitors to filter messages by particular key fields (such as participant or asset).

Publication & Reporting

Ref	Requirement
2.3.11*	The login functionality will be available through a sub-option under the 'Urgent Market Messages' tab.
Historic messages in .csv file format	
2.3.12*	At the end of each calendar day, a .csv format file will be generated containing all the messages published in that calendar day. This will be published on the BMRS and on the ELEXON Portal.
High grade service	
2.3.13*	BSC Parties that have subscribed to the 'high grade' service will be able to receive inside information messages through the TIBCO feed, in the same way as other data from the BMRA.

Audit Trail

Ref	Requirement
2.4.01*	The BMRS will be required to display messages for three years following publication.
2.4.02*	The BMRS and ELEXON Portal will be required to make historic message files available to download for three years following the relevant calendar date.
2.4.03*	All messages will be archived, and will be available to participants upon request.
2.4.04*	The individual participant that submitted a message will also be recorded; however this information will not be included as part of messages or provided as part of historic message requests.
2.4.05*	The BMRS will contain functionality that will allow messages to be reported to Ofgem and ACER. This should include the ability to report data for specific organisations, assets etc.

Support

Ref	Requirement
2.5.01*	All customer queries and historic message requests will be handled through the BSC Service Desk.
2.5.02*	The 'Help' section of the BMRS will be updated to provide support and instructions on all aspects of the REMIT inside information reporting platform, including submission of data.

Non-functional Requirements

Ref	Requirement
2.6.01*	Messages will be displayed publicly for three years following initial publication. All messages will be stored in archive indefinitely.
2.6.02*	The reporting platform should be available at all times for participants to view. SLAs around availability should be aligned with existing BMRS availability SLAs.

Non-functional Requirements	
Ref	Requirement
2.6.03	The BMRS should be available at all times for participants to submit information. SLAs around availability should be aligned with existing BMRS availability SLAs.
2.6.04*	Disaster Recovery procedures should be aligned with existing practice.
2.6.05*	Messages should be published on the BMRS as soon as possible after submission by the participant. Publication should be immediate, but any lag time due to system constraints should be no longer than two minutes.

Solution requirements for submission Method 3 (Grid Code)

The Workgroup has identified the following solution requirements for Method 3 (information is submitted via the Grid Code).

Parties to the Grid Code submit data to National Grid, including outage information and PN and MEL/MIL changes. Outage change information and MEL/MIL changes represent some of the information that is captured under the REMIT regulation. Solution C (Method 3) seeks to minimise the impact on parties by submitting data they already submit to National Grid to the BMRS platform for REMIT purposes. Solutions D (Method 3 with Method 1) and E (Method 3 with Method 2) would also make available functionality on the ELEXON Portal or BMRS website for Parties to submit other REMIT information direct to the BMRS platform. Under Solution F (Method 3 and Transmission Company functionality akin to Methods 1 and 2), Parties would submit this other REMIT information to National Grid before onward submission to the BMRS platform.

For Solution D (Method 3 with Method 1), the requirements for Method 1 (see Section 3) should be merges with these requirements. For Solution E (Method 3 with Method 2), the requirements for Method 2 (see Section 4) should be merges with these requirements. For Solution F (Method 3 and Transmission Company functionality akin to Methods 1 and 2), the Transmission Company should adopt the relevant requirements from either Section 3 (Method 1) or Section 4 (Method 2), and these should be merges with the requirements in this section. Common requirements are marked with an asterisk.

For the purpose of this document, 'participant' refers to any industry participant who may be required to submit inside information (irrespective of whether they are a BSC Party or not).

User Management & Security	
Ref	Requirement
General	
3.1.01*	All visitors to the BMRS platform will have free access to view all messages and will have free access to download historic messages.
3.1.02*	It will not be mandatory for participants to submit inside information to the BMRS. Participants can elect to continue to use other locations (e.g. their own websites).
3.1.03	Under a hybrid solution, it will not be mandatory for participants who are able to submit inside information via the Grid Code to do so. Participants can instead elect to use the online form submission method to submit information to the BMRS if they wish.
3.1.04*	All information will be uploaded to the BMRS through a secure server.
Authentication to submit inside information via Grid Code submissions	
3.1.05	Any Grid Code Party that is required to submit OC2 data to the Transmission Company will be allowed to submit the required information as part of those submissions. No additional authorisations will be required beyond what is required under the Grid Code to submit OC2 data.

User Management & Security

Ref	Requirement
3.1.06	Any Party with an Electronic Dispatch Logging (EDL) and/or Electronic Data Transfer (EDT) connection with the Transmission Company will be allowed to submit the required information as part of submissions made through these systems. No additional authorisations will be required beyond what is required under the Grid Code to submit this data via these systems.
3.1.07	The Transmission Company should consider the option of allowing non-Grid Code Parties the ability to submit information via the Grid Code. If this is deemed unfeasible then this option should not be taken forward. If this is taken forward then authentication processes should match those required for Grid Code Parties.
3.1.08	Participants will only be able to submit information relating to the assets that they are authorised to submit standard information for under the Grid Code.

User Interface & Data Provision

Ref	Requirement
Submission of additional information through Grid Code submissions	
3.2.01	The existing OC2, MEL/MIL and PN submission methods will be amended as required to ensure all information required for inside information messages can be included in submissions. The list of data items required for messages can be found in Appendix 1. Under a hybrid solution, the data Parties submit through the Grid Code must align with that which they would be required to provide through the online form methodology.
3.2.02	Participants will submit OC2, MEL/MIL and PN submission with inside information included in the same way as current submissions.
3.2.03	Once a participant makes a submission, a validation will be carried out to ensure all required data items have been submitted. If this check is failed, the participant will be notified.
3.2.04	Once a participant has published a message they cannot edit it. The participant would instead need to submit a 'follow-up' message containing the amended information.
Transmission Company to forward information to BMRS	
3.2.05	The Transmission Company will send all inside information messages received via Grid Code submissions to the BMRS within an agreed target time.
3.2.06	The information will be published on BMRS immediately following its receipt from the Transmission Company.
Message groups and follow-up messages	
3.2.07*	An original message and any follow-up messages stemming from that will form a 'group'.
3.2.08	An original message will be allocated a sequence number. The format of this number is to be determined, but it could be based on the submission date and time of the message.
3.2.09	If a participant wishes to submit a 'follow-up' message, they will be required to include the sequence number of the original message in their submission. This will 'group' the messages together.

User Interface & Data Provision	
Ref	Requirement
3.2.10*	A 'follow-up' message is published on the BMRS in the same way as a new message, except that any amended fields will be highlighted and the notice 'follow-up' will be shown at the top of the message.
3.2.11*	Each message in a group of two or more messages will have a list at the bottom of the message of all messages in the group (including the currently viewed message). Each entry will act as a hyperlink to the respective message (which will open in the same browser tab).
Submitting messages across multiple Methods (hybrid solutions only)	
3.2.12	A participant will be able to submit messages for an event across both the Grid Code and online form methodology. A link will be established for assets through the National Grid BM Unit ID, as all assets that report information through the Grid Code will have such an ID.
3.2.13	The asset will need to be registered through the online form methodology using the National Grid BM Unit ID in order for this link to be established.
3.2.14	If this link is established, any messages submitted via the Grid Code will appear on the organisation's history on the online form methodology, and they will be able to submit follow-up messages. The sequence number will be used to link all messages in a group across both methodologies.
3.2.15	If the original message for the event is submitted via Method 1 or 2, or Transmission Company functionality akin to these Methods, a sequence number will need to be allocated to allow participants to submit follow-up messages via the Grid Code methodology.
Automated data submission	
-	<i>The P291 Workgroup requests that the Transmission Company provide cost and lead times for the relevant solutions with and without the below requirements 3.2.16 to 3.2.19.</i>
3.2.16	Participants will be able to set up an automated data entry facility which will allow automated system-to-system interfaces such as web services. Such web services should be secure and an appropriate authentication mechanism should be in place.
3.2.17	This facility should allow participants to automatically publish messages submitted via the Grid Code on their own websites simultaneously with publication on the BMRS.
3.2.18	The facility for participants to submit messages from their own systems to the Transmission Company should also be explored, although such a methodology must provide all the information required through the Grid Code submission method.
3.2.19	The Transmission Company will be required to validate any requests for system-to-system interfaces before such a connection is established.

Publication & Reporting	
Ref	Requirement
Publication of messages on BMRS	
3.3.01*	A new heading will be added to the navigation tab at the top of BMRS webpages entitled 'Urgent Market Messages'. All aspects of the REMIT inside information platform will sit under and be reached through this tab.
3.3.02*	Selecting the 'Urgent Market Messages' option on the navigation tab will take the user to the reporting platform summary page. This section shall contain the relevant disclaimers, which shall be sited in an obvious position (such as the first applicable landing page).
3.3.03*	The summary page will contain a list summarising all messages that have been published. The list will contain the title of each message and the date and time of publication. The list will be arranged in reverse chronological order (i.e. newest at top).
3.3.04*	The title of each message in the list will act as a hyperlink to the detailed message. Clicking this link will open the message in a new browser tab.
3.3.05*	An example of the detailed message tab can be found in Appendix 2.
3.3.06*	A message will be published on the BMRS immediately once received by the BMRS from the Transmission Company.
3.3.07*	The message summary page and all individual messages will be freely available to view by any visitor to the BMRS website.
3.3.08*	The message summary page will contain automatic refresh functionality to allow new messages to appear on the messages webpage without the user having to manually refresh the webpage periodically. This automatic refresh will be triggered by the submission of a new message.
3.3.09*	The platform will include search functionality that will allow visitors to search through published messages. This will allow visitors to filter messages by particular key fields (such as participant or asset).
Historic messages in .csv file format	
3.3.10*	At the end of each calendar day, a .csv format file will be generated containing all the messages published in that calendar day. This will be published on the BMRS.
High grade service	
3.3.11*	BSC Parties that have subscribed to the 'high grade' service will be able to receive inside information messages through the TIBCO feed, in the same way as other data from the BMRA.

Audit Trail	
Ref	Requirement
3.4.01*	The BMRS will be required to display messages for three years following publication.
3.4.02*	The BMRS will be required to make historic message files available to download for three years following the relevant calendar date.
3.4.03*	All messages will be archived, and will be available to participants upon request.

Audit Trail

Ref	Requirement
3.4.04*	The individual participant that submitted the source Grid Code submission will also be recorded; however this information will not be included as part of messages or provided as part of historic message requests.
3.4.05*	The BMRS will contain functionality that will allow messages to be reported to Ofgem and ACER. This should include the ability to report data for specific organisations, assets etc.

Support

Ref	Requirement
3.5.01*	All customer queries and historic message requests will be handled through the BSC Service Desk.
3.5.02*	The 'Help' section of the BMRS will be updated to provide support and instructions on all aspects of the REMIT inside information reporting platform, including submission of data.

Non-functional Requirements

Ref	Requirement
3.6.01*	Messages will be displayed publicly for three years following initial publication. All messages will be stored in archive indefinitely.
3.6.02*	The reporting platform should be available at all times for participants to view. SLAs around availability should be aligned with existing BMRS availability SLAs.
3.6.03	The Grid Code submission systems should be available at all times for participants to submit information. SLAs around availability should be aligned with existing availability SLAs.
3.6.04*	Disaster Recovery procedures should be aligned with existing practice.
3.6.05	Messages should be sent by the Transmission Company to the BMRS as soon as possible after receipt.
3.6.06*	Messages should be published on the BMRS as soon as possible after receipt from the Transmission Company. Publication should be immediate, but any lag time due to system constraints should be no longer than two minutes.

P291 impacts

Impact on BSC Systems and process

BSC System/Process	Potential impact
BMRA	The BMRA will be responsible for receiving inside information from whichever submission method is chosen and publishing that information on the BMRS.
BMRS	The BMRS will be updated to include an inside information reporting platform and a list of historic messages stored as daily .csv format files. Method 2 will also amend the BMRS to allow participants to submit their inside information via the website.

Impact on BSC Parties and Party Agents

Method 3 may impact BSC Parties if changes are required to the methods of submitting data under the Grid Code.

Methods 1 and 2 are not anticipated to have a direct impact on BSC Parties.

BSC Parties (and other market participants) will be able to publish inside information to and obtain this information from a central reporting platform following implementation.

Parties may also wish to align or develop automated data submission processes in line with the solution requirements should they wish, although this is optional.

Impact on Transmission Company

Under Method 3, the Transmission Company will be required to receive inside information from participants as part of notifications under the Grid Code, and will be required to submit this information to the BMRS website.

No impact is anticipated under Methods 1 or 2. However, Solution F would also require the Transmission Company to develop online form functionality akin to these methods.

Impact on ELEXON

Area of ELEXON	Potential impact
Release Management	ELEXON will manage the implementation project.
ELEXON Portal	Method 1 will amend the ELEXON Portal to allow participants to submit their inside information via the Portal.

Impact on Code

Code Section	Potential impact
Section Q	Changes will be required to implement any of the proposed solutions.
Section V	

Impact on Code Subsidiary Documents

CSD	Potential impact
BMRA Service Description	Changes will be required to implement any of the proposed solutions.

Impact on Core Industry Documents and other documents	
Document	Potential impact
Grid Code	Changes will be required to implement Method 3.

Impact on other Configurable Items	
Configurable Item	Potential impact
BMRA User Requirements Specification	Changes will be required to implement any of the proposed solutions.

Appendix 1: Additional Information for Requirements

Online form for inside information messages

The table below details the fields that will be included in the online form for submitting a message as part of Methods 1 or 2.

Inside Information Message Form Fields	
Field	Description
Message Summary	
Message Heading*	User can choose to have the heading generated based on the message details (see below) or to input their own heading. For the former, an automatically generated preview of the heading will be shown, updated as the relevant form fields are populated. For the latter, a free-text field will be offered.
Event Type*	Drop-down list containing a list of event types (e.g. Planned Outage, Failure, Special Information). The selection will determine some other fields in the table. Definitions will be required for each Event Type.
Published	Datetime field. Automatically populated when the message is submitted for publication.
Participant Details	
Participant ID*	Drop-down list containing a list of the organisation IDs that the participant is eligible to report for.
Participant Name	Automatically populated based on choice of Participant ID.
Asset Details	
Asset*	Drop-down list containing a list of the assets that the participant is eligible to report on. Participants can only report on one asset per message. The option "No Asset" will be available in case the participant is submitting a piece of general inside information that doesn't relate to a specific asset – if this is selected, the remaining asset fields will be left blank. "No Asset" will only be available if 'Event Type' is "Special Information".
Asset Type	Automatically populated based on asset information.
[Affected Unit]	Automatically populated based on asset information. The title of the field will change to match the 'Unit Type' chosen for the particular asset (see 'online form for registering an asset' below). This field will not be displayed on the final message if the Unit is a 'Non-registered Unit' (i.e. not registered in central systems or with the Transmission Company).
Affected Area	Automatically populated based on asset information. If "No Asset" is selected for 'Asset' then the participant will instead be able to manually select an area from a drop-down list if they wish (see 'online form for registering an asset' below).
Type of Fuel	Automatically populated based on asset information.
Normal Capacity (MW)	Automatically populated based on asset information.

Inside Information Message Form Fields	
Field	Description
Event Details	
Available Capacity (MW) [†]	Number field manually filled in by participant.
Event Start [†]	Datetime field showing the time the event started/will start.
Event End [†]	Datetime field showing the time the event ended/is expected to end.
Duration Uncertainty [†]	Free text field where the participant can indicate the level of uncertainty in the expected duration.
Cause [†]	Drop-down list containing a list of causes for the event (list to be determined, but will include "Unknown/Under Investigation").
Event Status [†]	Radio button list showing a list of options for the event status (e.g. Open, Closed, Cancelled etc.). List will default to "Open".
Related Information	
Related Information	Free text field where the participant can add any further information they feel necessary.

* denotes mandatory field.

[†] denotes mandatory field if 'Event Type' is "Planned Outage" or "Failure" but optional if "Special Information".

Any non-mandatory fields left blank by the participant will not be shown on the published message.

Automatic generation of Message Heading

Participants can elect to have a heading automatically generated for their message. This will be generated based on their choice of 'Participant ID', 'Asset', 'Event Type' and the start and end dates, and whether the message is a new message or a follow-up message.

Suggested formats for the header would be:

If Event Type is "Failure":

[New/Update]: [Participant ID] – Failure of [Asset] at dd/mm/yy hh:mm, expected to last until dd/mm/yy hh:mm

If Event Type is "Planned Outage":

[New/Update]: [Participant ID] – Planned Outage for [Asset] from dd/mm/yy hh:mm until dd/mm/yy hh:mm

If Event Type is "Special Information":

[New/Update]: [Participant ID] – special information [in relation to [Asset]]

Messages submitted via a Grid Code submission (Method 3) will always have their headings automatically generated in this way.

Online form for registering an asset

The table below details the fields that will be included in the online form for registering an asset as part of Methods 1 or 2.

Asset Registration Form Fields	
Field	Description
Asset Name	Free text field for the participant to enter the asset's name.
Asset Type	Choose from Production, Consumption, Transmission or Distribution.
Unit Type	Choose from BM Unit, GSP/TSBP/DSCP, Transmission Line, Distribution Line (list to be confirmed, other entries to be considered). An option will be needed for assets not registered in central systems or with National Grid, as a REMIT ID will be required in those cases for the 'Unit ID'. The list will be pre-filtered based on 'Asset Type' (e.g. 'Production' would only offer 'BM Unit' or 'Non-registered Unit').
Unit ID	Enter the ID of the Unit that related to this asset (e.g. a BM Unit ID or GSP ID). If the asset is not registered in central systems or with National Grid, the participant can enter their own REMIT ID (format to be determined, but it must be such that it cannot clash with existing Unit ID mechanisms).
Area	Select the area of the country this asset lies (suggest a drop-down list of the BMRS Zones).
Fuel Type	Enter the fuel type of the Unit (if applicable). Drop-down list.
Normal Capacity	Enter the normal capacity of the asset (such as maximum generation capacity for generating units or maximum demand capacity for consumption sites). Where this site is registered with National Grid, this could be automatically populated and subsequently updated from its database once the asset has been validated.

Appendix 2: Examples of Messages

Example of basic layout of message

Message Heading

[Follow-up]

Published: dd/mm/yy hh:mm

Participant Name: Text

Participant ID: Text

Asset: Text

Asset Type: Text

[Affected Unit:] Text

Affected Area: Text

Fuel Type: Text

Normal Capacity (MW): Number

Event Type: Text

Available Capacity (MW): Number

Event Start: dd/mm/yy hh:mm

Event End: dd/mm/yy hh:mm

Duration Uncertainty: Text

Cause: Text

Event Status: Text

Related Information: Text

Related Messages: ➤ [dd/mm/yy hh:mm](#)
[dd/mm/yy hh:mm](#)
[dd/mm/yy hh:mm](#)

Example 1: Generator, new message

New: EXAMGEN1 – Planned Outage for Power Station Generating Unit A from 01/03/13 09:00 until 15/03/13 18:00

Published: 01/01/13 08:00

Participant Name: Example Generator

Participant ID: EXAMGEN1

Asset: Power Station Generating Unit A

Asset Type: Generation

BM Unit: T_PSGEN1

Affected Area: B3

Fuel Type: Coal

Normal Capacity (MW): 200

Event Type: Planned Outage

Available Capacity (MW): 0

Event Start: 01/03/13 09:00

Event End: 15/03/13 18:00

Duration Uncertainty: +/- 24 hours

Cause: Planned Outage

Event Status: Open

Related Information: Planned outage for routine maintenance

Example 2: Large Consumer, follow-up message

Update: EXCONS1 – Failure of Large Consumption Site at 03/01/13 03:00, expected to last until 05/01/2013 16:00

Follow-up

Published: 03/01/13 12:00

Participant Name: Example Consumer

Participant ID: EXCONS1

Asset: Large Consumption Site

Asset Type: Consumption

Affected Area: B12

Normal Capacity (MW): 150

Event Type: Failure

Available Capacity (MW): 0

Event Start: 03/01/13 03:00

Event End: 05/01/13 16:00

Duration Uncertainty: +/- 12 hours

Cause: Fault

Event Status: Open

Related Information: Failure at Large Consumption Site, caused by a fault in transformer. Updated estimated time for return to normal operation.

Related Messages: ➤ [03/01/13 12:00](#)
[03/01/13 03:10](#)