

## Assessment Consultation Responses: P297 'Receipt and Publication of New and Revised Dynamic Data items'

**Consultation issued on 07 January 2014**

We received responses from the following Parties:

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
EDF Energy	10/0	Generator / Supplier / Party Agent / Consolidator / Exemptable Generator / Trader
National Grid Electricity Transmission plc	0/1	Transmission Company
RWE Supply & Trading GmbH	9/0	Supplier/Generator/Trader / Consolidator / Exemptable Generator / Party Agent
ScottishPower	3/0	Supplier / Generator / Trader /
SSE plc	8/0	Supplier / Generator / Trader /

What stage is this document in the process?

**01** Initial Written Assessment

**02** Definition Procedure

**03** Assessment Procedure

**04** Report Phase

Question 1: Please indicate the impact of the proposed changes to the BMRS Website on your organisation for the Proposed solution?

Summary

Yes	No	Neutral/Other
5	0	0

Responses

Respondent	Response	Rationale
<b>EDF Energy</b>	Yes	<p>Familiarisation with the new and revised parameters will be required by all staff using data to optimise balancing performance. BMRS itself should provide explanation, as for current parameters.</p> <p>National Grid should define exactly what is meant by net-position Stable Import Limit (SIL) and Stable Export Limit (SEL) at gate closure and how it will be calculated. Where the values of SIL/SEL at start and end times are different, will the values at times between start and end be assumed to be on a linearly interpolated slope?</p> <p>How would submissions after gate closure but within the displayed BM window be presented? Existing graphs of Maximum Export/Import Limits (MEL/MIL) on the Balancing Mechanism Reporting System (BMRS) website simply plot lines between start and end points of all submitted values. Would the existing method used for MEL/MIL be used? With notification times/sequence numbers, it would be possible to emphasise the most up-to-date profile at any given time including gate closure.</p> <p>We assume that Grid Code data validation, consistency, and defaulting rules (DVCDR) will have been applied before data reaches BMRS for reporting. Some of the DVCDR rules are effectively duplicated in the BSC assessment documents. We assume this is for information to assist design of the BMRS solution, but attention will be required to ensure NGET and BMRS systems remain aligned. We assume successive ramp-rates during run-up or run-down would no longer be required to change monotonically (increase or decrease respectively), so that a low ramp rate can have the effect of indicating a hold or slow ramp during an otherwise faster ramp up or down.</p> <p>In general, it might be sensible to allow larger field sizes in BMRS internal interfaces and external</p>

Respondent	Response	Rationale
		reporting (if they must be specified) to allow flexibility for potential future data specification changes, and rely on DVCDR to verify that current data is within current value limits.
<b>National Grid Electricity Transmission plc</b>	Yes	Little or no impact as National Grid is not a key user of the BMRS Website.
<b>RWE Supply &amp; Trading GmbH</b>	Yes	As we use the BMRS website only as a source of reference there will not be a high impact from these changes to our organisation.
<b>ScottishPower</b>	Yes	IT System Impact: Internal Data Repositories, Plant Historian, Operational Trading Systems and external EDL/EDT systems.
<b>SSE plc</b>	Yes	Minor impact to procedures and systems.

Question 2: Please indicate the impact of the proposed changes to the TIBCO message structure on your organisation for the Proposed solution?

#### Summary

Yes	No	Neutral/Other
5	0	0

#### Responses

Respondent	Response	Rationale
<b>EDF Energy</b>	Yes	<p>Multiple systems within EDF Energy consume messages from the High Grade TIBCO service. We will need to read the new XML formatted TIBCO messages in parallel to the existing flat messages going forwards, and ensure that our existing TIBCO software version supports this functionality. If this is not the case, it could add significant implementation costs.</p> <p>In addition, it would be useful for BSC parties to understand more about the roadmap for the TIBCO message format going forwards, noting suggestions made by ELEXON in its recent consultation on BMRS, and forthcoming changes for REMIT and EU Data Transparency.</p> <p>Support for new Last Time to Cancel Synchronisation (LTCS) data, and revised data for Run-Up Rates (Import and Export) and Run-Down Rates (Import and Export) and Stable Export Limit and Stable Import</p>

Respondent	Response	Rationale
		Limit will require software changes to our internal solutions. This will require planning, resourcing, analysis, design and testing.
<b>National Grid Electricity Transmission plc</b>	Yes	Little or no impact as National Grid is not a key user of TIBCO messages.
<b>RWE Supply &amp; Trading GmbH</b>	Yes	As we are a user of the TIBCO data feeds we will need to accommodate the new XML feeds. Again, there will not be a high impact from this.
<b>ScottishPower</b>	Yes	IT System Impact: TIBCO and its interfaces to internal Data Repositories, Plant Historian, Operational Trading Systems and external EDL/EDT systems.
<b>SSE plc</b>	Yes	Significant changes will be required to the both SSE developed and externally outsourced applications to handle the changed message structure.

Question 3: Do you agree that the draft legal text in Attachment A delivers the intention of the P297 Proposed and potential Alternative solutions?

#### Summary

Yes	No	Neutral/Other
4	0	1

#### Responses

Respondent	Response	Rationale
<b>EDF Energy</b>	Neutral	No comment.
<b>National Grid Electricity Transmission plc</b>	Yes	We agree that the draft legal text delivers the intention of the solutions. However as it is not just the definition of the Last Time to Cancel Synchronisation item of Dynamic Data that is proposed to move from Grid Code BC1 to BC2 under Grid Code modification GC0068, but all the items of Dynamic Data listed in the amended paragraph Q2.1.2, then it would be good if all the Dynamic Data definitions in X-2 were updated to replace the reference to "BC1" with "Balancing Codes".
<b>RWE Supply &amp; Trading GmbH</b>	Yes	It covers the requirements of the Modification appropriately.
<b>ScottishPower</b>	Yes	-

Respondent	Response	Rationale
<b>SSE plc</b>	Yes	-

Question 4: Do you have any comments on the draft redlined changes to NETA IDD Part 1 (Attachment B) and NETA IDD Part 2 (Attachment C)?

#### Summary

Yes	No	Neutral/Other
3	2	0

#### Responses

Respondent	Response	Rationale
<b>EDF Energy</b>	Yes	The XML Schema Definition (XSDs) documents for TIBCO messages using the new XML schema will be very important for BSC parties that use TIBCO. Currently, BSC parties use the Interface Definition Documents, and ELEXON should ensure new information is presented in a way which facilitates changes to user systems in a timely and accurate fashion.
<b>National Grid Electricity Transmission plc</b>	Yes	We do have a comment on the Proposed Solution draft of NETA IDD Part 1. This is that the approach to publishing SEL and SIL data under the Proposed Solution is based on the current approach for MEL and MIL, but the proposed message definitions for SEL in 4.7.5.44 and SIL in 4.7.5.45 are substantially different to those for MEL in 4.7.5.28 and MIL in 4.7.5.29. We would welcome an explanation of the reasons for the differences as this will help validate the Proposed Solution. We have no comments on the draft of NETA IDD Part 2.
<b>RWE Supply &amp; Trading GmbH</b>	No	It covers the requirements of the Modification appropriately.
<b>ScottishPower</b>	Yes	Redline changes appear all to be appropriate. With regard to LTCS and in particular the Effective Time sent to BMRA, is this field re-calculated if bid acceptance keeping a BMU off and the Last Cancel Time falls between the instruction and delivery?
<b>SSE plc</b>	No	-

Question 5: Please indicate the impact of the proposed changes to the BMRS Website on your organisation for the potential Alternative solution?

#### Summary

Yes	No	Neutral/Other
5	0	0

#### Responses

Respondent	Response	Rationale
<b>EDF Energy</b>	Yes	<p>User familiarisation as above. We assume the alternative proposal would in principle report initial SIL/SEL data for each BM Unit, and each subsequent submission made for that BM Unit. However:</p> <ol style="list-style-type: none"> <li>1. The alternative proposal does not include notification times/sequence numbers for SIL/SEL data. Without these, how would a user determine the prevailing SIL/SEL position at any particular time from among potential multiple submissions affecting that time?</li> <li>2. The assessment consultation says there would be no end times for the individual messages. Is this because NGET would create sequences of simple open-ended values with start times from the data submitted by participants? How would this work?</li> <li>3. How would submissions made by participants before gate closure for future times be handled? Would NGET create data for BMRS as at gate closure and any changes thereafter? How?</li> </ol>
<b>National Grid Electricity Transmission plc</b>	Yes	Little or no impact as National Grid is not a key user of the BMRS Website.
<b>RWE Supply &amp; Trading GmbH</b>	Yes	As we use the BMRS web site only as a source of reference there would not be a high impact from the potential Alternative solution.
<b>ScottishPower</b>	Yes	Low impact - some additional information provided.
<b>SSE plc</b>	Yes	See response to Question 1.

Question 6: Please indicate the impact of the proposed changes to the TIBCO message structure on your organisation for the potential Alternative solution?

#### Summary

Yes	No	Neutral/Other
5	0	0

#### Responses

Respondent	Response	Rationale
<b>EDF Energy</b>	Yes	As per Question 2 above.
<b>National Grid Electricity Transmission plc</b>	Yes	Little or no impact as National Grid is not a key user of TIBCO messages.
<b>RWE Supply &amp; Trading GmbH</b>	Yes	As we are a user of the TIBCO data feeds we would need to accommodate the new XML feeds. Again, there would not be a high impact from this.
<b>ScottishPower</b>	Yes	It would have an impact on our IT Systems, TIBCO and its interfaces to internal Data Repositories, Plant Historian, Operational Trading Systems, external EDL/EDT systems and to some degree would require additional effort as different formats may be required when the alternative solution is compared to the proposed solution.
<b>SSE plc</b>	Yes	See response to Question 2.

Question 7: Do you agree with the Workgroup's recommended Implementation Approaches?

#### Summary

Yes	No	Neutral/Other
4	0	1

#### Responses

Respondent	Response	Rationale
<b>EDF Energy</b>	Yes/No	Precise alignment of: 1. submission of new data items by participants to NGET, 2. submission of new data items to BMRS by NGET,

Respondent	Response	Rationale
		<p>and</p> <p>3. new reporting capability of BMRS could reduce transition issues. Without careful alignment of different components of the overall implementation, problems could arise.</p> <p>The solution seems to assume that BMRS changes would be made first, with NGET submitting existing data to BMRS in the new format at the same time. This can work for ramp rate data and for SIL/SEL. How would LTCS data be handled?</p> <p>What would happen if NGET start receiving new dynamic data using EDT*/EDL* before BMRS is ready?</p> <p>Go-live of the new EBS has recently been postponed from Q3 2014 to Q2 2015, with new EBS EDT*/EDL* interfaces made available to participants about 6 months later in Q4 2015. The potential Go-Live for the Alternative solution on 25 June 2015 originally aligned well with the expectation of EBS EDT*/EDL* interfaces becoming available about that time. Now the EBS has been delayed, a 5 November 2015 implementation date as for the proposal may align better, subject to concerns that revised data could become available before BMRS interface and reporting changes are made. It is unusual to have an alternative proposal that is not the preferred solution of the workgroup.</p>
<b>National Grid Electricity Transmission plc</b>	Yes	We have been involved in the discussions at the Workgroup regarding Implementation Approaches and agree with the recommended approaches.
<b>RWE Supply &amp; Trading GmbH</b>	Yes	They are appropriate given the impact of each solution (Proposed or Alternate).
<b>ScottishPower</b>	Yes	IT changes can be accommodated but costs can be reduced the longer the notice period, fewer changes et cetera. Proposed solution is preferable.
<b>SSE plc</b>	Yes	-



Question 8: Please indicate the impacts of the Proposed and potential Alternative solutions on your organisation, in particular any perceived lead time and costs.

#### Summary

Yes	No	Neutral/Other
5	0	0

#### Responses

Respondent	Response	Rationale
<b>EDF Energy</b>	Yes	See responses to Questions 1,2,4,5,6 above. We would need at least 6 months to align with the proposed/alternative changes, and at this stage estimate the total implementation cost could be of the order of £100K for changes to software and procedures to take full advantage of the proposal.
<b>National Grid Electricity Transmission plc</b>	Yes	The consultation already details the lead times that National Grid would need for each solution.
<b>RWE Supply &amp; Trading GmbH</b>	Yes	We will need to modify systems to cope with the new data sent via TIBCO. We do not anticipate any particular issues with lead time or costs for the proposed Implementation Approaches.
<b>ScottishPower</b>	Yes	IT changes and Operational Procedures can be accommodated but costs can be reduced the longer the notice period and least number of changes. Is this dependent on EBS Go-live dates remaining as described? Proposed solution is preferable.
<b>SSE plc</b>	Yes	In the region of £50k - £100k to design, alter and test impacted applications and processes. Required lead time of 6 months.

Question 9: Are there any other Alternative Solutions that the P297 Workgroup should consider?

#### Summary

Yes	No	Neutral/Other
1	3	1

## Responses

Respondent	Response	Rationale
<b>EDF Energy</b>	Other	We remain concerned that potential interactions or overlaps between P291/REMIT, P295/Data Transparency Regulation, and EBS/P297 have not been fully considered.
<b>National Grid Electricity Transmission plc</b>	No	No
<b>RWE Supply &amp; Trading GmbH</b>	No	We do not have any further alternatives to propose.
<b>ScottishPower</b>	Yes	Firstly removing all fixed special conditions should be a priority and secondly, submitting dynamics for multiple sub-sets of one BMU allied with distinct Bid/Offer Ladders for, but not exclusively, multi-shaft CCGTs and cascade Hydro Schemes promoting efficiency in the implementation and administration of the balancing and settlement arrangements.
<b>SSE plc</b>	No	-

Question 10: Do you agree with the Workgroup's initial unanimous view that the P297 Proposed solution does better facilitate the Applicable BSC Objectives than the current baseline?

## Summary

Yes	No	Neutral/Other
5	0	0

## Responses

Respondent	Response	Rationale
<b>EDF Energy</b>	Yes	<p>Our view is unchanged since previous consultation.</p> <p>The proposal arises from non-BSC changes in support of more efficient system balancing operation by the Transmission Company and participants, which affect the BSC. It can therefore be considered part of changes better meeting BSC Objective (b) concerning effective system operation.</p> <p>The proposal provides market participants with information to support competitive market activity and monitoring, and therefore better meets BSC Objective</p>

Respondent	Response	Rationale
		<p>(c) concerning competition.</p> <p>The proposal carries an implementation cost which in isolation does not better meet BSC Objective (d) concerning efficiency in implementation of the BSC arrangements. However, considered together with benefits for BSC Objectives (b) and (c) above, we consider the proposal better meets BSC Objectives overall.</p> <p>BSC Objective (e) concerning EU regulations does not appear directly relevant, however we note that increased transparency of data affecting market activity is an overarching aspiration of the EU Target model for electricity, and this proposal promotes data transparency.</p>
<b>National Grid Electricity Transmission plc</b>	Yes	Yes, for the reasons given by the proposer in section 8 of the consultation.
<b>RWE Supply &amp; Trading GmbH</b>	Yes	The solution appears to best meet Objective C as agreed by the workgroup.
<b>ScottishPower</b>	Yes	It will help promote efficiency in the implementation and administration of the balancing and settlement arrangements. It will do this: through greater transparency of information published for all to see and use; by allowing generators to submit parameters closer to physical plant dynamics and reflective of their costs; National Grid to use these dynamics to model more accurately (and therefore more cost-effectively) the results that will be delivered; by a better despatch decision being made by National Grid.
<b>SSE plc</b>	Yes	For the reasons set out in the consultation by the Workgroup, primarily objective (c) and to a lesser extent objective (d).

Question 11: Do you agree with the Workgroup's initial unanimous view that the P297 Proposed solution is better than the potential Alternative solution?

#### Summary

Yes	No	Neutral/Other
4	0	1

## Responses

Respondent	Response	Rationale
<b>EDF Energy</b>	Yes/No	We are unsure at this stage. More information on the handling of SEL/SIL data under the alternative, and any similarities with future reporting of short-term generator availability in accordance with REMIT and/or Data Transparency Regulations, is needed. Potential changes to reporting of MEL data as a method of fulfilling EU REMIT/Data Transparency Regulations might align better with the alternative proposal, depending on exactly how it would work.
<b>National Grid Electricity Transmission plc</b>	Yes	We believe that the potential Alternative solution will have a detrimental impact on the SEL/SIL information published as it may be difficult or even impossible for users of the BMRS to determine a BMU's SEL/SIL from the published raw data. For example, it may be necessary for users of the BMRS to take account of data submitted in 2001 in order to determine a BMU's SEL/SIL and this data may no longer be available.
<b>RWE Supply &amp; Trading GmbH</b>	Yes	It will report SEL/SIL clearly and meets with the current practice on reporting MEL/MIL on the BMRS.
<b>ScottishPower</b>	Yes	One change at EBS Go-live with data in XML file format preferable. Though there is a potential small cost saving based perhaps based on testing savings there is a bigger impact internally to ScottishPower of too many deliverables close together of external IT interfaces. One target of EBS Go-live preferable. Therefore this would hinder the promotion of efficiency in the implementation and administration of the balancing and settlement arrangements
<b>SSE plc</b>	Yes	For the reasons stated in the consultation by the Workgroup.