



Stage 04: Report Phase Consultation

P299 'Allow National Grid access to Metering System Metered Consumption data to support DSBR service'

This Modification proposes changes to allow the Transmission Company to gain access to Suppliers' Metering System Metered Consumption data, which is provided by Half Hourly Data Collectors to Half Hourly Data Aggregators.

This data is required to support the validation of submitted tender data and to process the settlement of payments for the delivery of the new Demand Side Balancing Reserve service.

This Report Phase Consultation for P299 closes:

5pm on Monday 28 April 2014

The Panel may not be able to consider late responses.



The BSC Panel initially recommends **approval** of P299



Medium Impact:

- Half Hourly Data Collectors
- Suppliers



Low Impact:

- ELEXON

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

▶ 04 Report Phase



Any questions?

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About This Document

This is the P299 Draft Modification Report, which ELEXON is issuing for industry consultation on the BSC Panel's behalf. It contains the Panel's provisional recommendations on P299. The Panel will consider all consultation responses at its meeting on 8 May 2014, when it will agree a final recommendation to the Authority on whether or not the change should be made.

There are four parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits, drawbacks and proposed implementation approach. It also summarises the Workgroup's key views on the areas set by the Panel in its Terms of Reference, and contains details of the Workgroup's membership and full Terms of Reference.
- Attachment A contains the draft redlined changes to the BSC for P299.
- Attachment B contains the draft redlined changes to BSCP502 for P299.
- Attachment C contains the full responses to the Workgroup's Assessment Procedure Consultation.
- Attachment D contains the Transmission Company's Assessment Procedure Consultation response.
- Attachment E contains the specific questions on which the Panel seeks your views. Please use this form to provide your responses to these questions, and to record any further views and comments you wish the Panel to consider.

P299
Report Phase Consultation

10 April 2014

Version 1.0

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Why Change?

The new Demand Side Balancing Reserve (DSBR) service will be used to support the Transmission Company in balancing the system if capacity margins tighten during the next few years.

In order to validate tendering data submitted by potential DSBR service providers, and support the settlement of payments for the delivery of the DSBR service, the Transmission Company requires access to Metering System Metered Consumption data for sites offering the service.

Solution

P299 proposes changes to allow the Transmission Company to gain access to Suppliers' Metering System Metered Consumption data. This data is required to support the validation of submitted tender data and to process the settlement of payments for the delivery of the new DSBR service.

Impacts & Costs

It is anticipated that P299 will directly impact **HHDCs**, with indirect impacts on **Suppliers**.

The estimated central implementation cost of P299 equates to £240 (or one ELEXON man day).

Implementation

10 Working Days following the Authority's decision.

Recommendation

The Panel unanimously believes that P299 would better facilitate Applicable BSC Objective (b) and therefore unanimously recommends that P299 is approved.

What is Demand Side Balancing Reserve?

Within the role of System Operator, the Transmission Company (National Grid) is required to co-ordinate and direct the flow of electricity onto and over the Transmission System in an efficient, economic and co-ordinated manner. As part of this role, the Transmission Company procures and uses balancing services from Transmission System users, and other third parties, in accordance with the requirements set out in Standard Licence Condition (SLC) 16 'Procurement and use of balancing systems' of the [Transmission Licence](#).

The Transmission Company is introducing a new balancing service known as the Demand Side Balancing Reserve (DSBR)¹. DSBR is aimed at non-domestic consumers with the ability to reduce Half Hourly (HH) metered demand at times of peak demand. It is unlikely that DSBR will be used frequently; however, in the unlikely event that there is insufficient plant availability to meet demand, consumers that have signed up to the scheme may be asked to reduce demand in return for payment. There would be no consumer obligation to respond or penalties for not responding; the scheme relies on payments to consumers as an incentive to reduce demand.

It is expected that direct HH end users or intermediaries (including, but not limited to, Suppliers and existing balancing service aggregators²) will offer volumes for the DSBR service at a Metering System Identification Number (MSID³) level for sites that could reduce demand or increase generation at times of system stress.

On 19 December 2013 Ofgem announced its decision to approve the Transmission Company's application to introduce DSBR⁴. Ofgem's previous analysis indicated that the GB energy industry faces an unprecedented challenge to secure supplies and that DSBR will provide the Transmission Company with an additional tool to help balance the system in anticipation of tighter capacity margins.

What is Metering System Metered Consumption data?

Suppliers' Metering System Metered Consumption (SMMC_{Zakj}) data is the HH metered consumption of a Supplier Volume Allocation (SVA) Metering System, as set out in BSC Section S Annex S-2, paragraph 3.5.3. This data is determined by Half Hourly Data Collectors (HHDCs) and provided to relevant Half Hourly Data Aggregators (HHDA) for aggregation (a process which includes the application of distribution line losses). This data is then sent by HHDA to the Supplier Volume Allocation Agent (SVAA) for Settlement.

What is the issue?

DSBR will be used to support the Transmission Company in balancing the system if capacity margins tighten during the next few years.

¹ <http://www.nationalgrid.com/NR/rdonlyres/3F8C2A41-F3D7-4847-9CC2-1788F4ADD16D/63265/DSBRRReportFinal181113.pdf>

² These are agents used by the Transmission Company for balancing services like the Short Term Operating Reserve (STOR).

³ MSID is a defined BSC term which is commonly referred to as the Metering Point Administration Number (MPAN).

⁴ <https://www.ofgem.gov.uk/publications-and-updates/national-grid%E2%80%99s-proposed-new-balancing-services-decision-letter>

In order to validate tendering data submitted by potential DSBR service providers and support settlement of payments for the delivery of the DSBR service, the Transmission Company requires access to the Metering System Metered Consumption data at sites that tender for and are accepted to provide the service.

Currently, [BSC Section L](#) 'Metering', paragraph 5.2.4 allows the Transmission Company to have access to 'relevant metering data' which, for SVA Metering Systems, is defined as being the metering data specified in BSCP508 'Supplier Volume Allocation Agent' and BSCP520 'Unmetered Suppliers registered in SMRS'. When considering the spirit of the BSC, 'relevant metering data' could include Metering System Metered Consumption data. However the wording is not completely clear therefore, to avoid ambiguity it would be of value to amend BSC Section L to include the use of this data in circumstances such as these.

Proposed solution

P299 proposes changes to allow the Transmission Company to gain access to Suppliers' Metering System Metered Consumption (SMMC_{Zakj}) data. This data is required to support the validation of submitted tender⁵ data and to process the settlement of payments for the delivery of the new DSBR service.

This Modification proposes that ad-hoc reports, requested by the Transmission Company from HHDCs, will contain the following disaggregated data as a minimum:

- for each MSID where the DSBR service is tendered, HH consumption data for the entire previous winter period (i.e. data for all Settlement Periods for all days, including weekends and bank holidays). This is required for validation purposes in order to ensure that what is being offered within the tenders is consistent with consumption during peak periods; and
- for each MSID where the DSBR service is called or tested, HH consumption data for all Settlement Periods on the days when the service is called, plus data for a selection of 10 previous days, as nominated by the Transmission Company, to calculate the baseline in order to support settlement of payments for delivery of the service.

Such data may need to be shared with intermediaries involved in the procurement of DSBR (i.e. Suppliers or balancing service aggregators) for the purposes of validation and settlement of potentially thousands of MSIDs.

Processes and timescales

As noted above, this Modification proposes that HHDCs submit ad-hoc reports to the Transmission Company, both for the validation of submitted tender data and to process the settlement of payments for the DSBR service.

If P299 is approved, the process and timescales associated with the DSBR tender process (i.e. the request for historic data) will be as follows:

- P299 is approved by the Authority;
- 4 Weeks duration - The **Transmission Company** initiates and conducts the DSBR tender process;
- 1 Week duration - The **Transmission Company** processes submitted tender requests to determine the relevant MSID data required from HHDCs.
- The **Transmission Company** requests the required historic MSID data from HHDCs for each tendered MSID. In its request the Transmission Company will list only those MSIDs and dates relevant to each HHDC. This means that HHDCs will only have to provide data for dates they were appointed to an MSID;
- 5 Working Days– **HHDCs** will have 5 (WDs) to collate and send the required data to the Transmission Company;

⁵ Further information about the tendering process can be found in Section 2 of the [Transmission Company's Supporting Report to the Authority](#).

- The **Transmission Company** will review the information provided and use it as required. For the tendering process no follow up requests will be sent to HHDCs.

If P299 is approved, the process and timescales associated with a DSB event, as well as any 'post DSB event' or testing data requests, will be as follows:

- Prior to a DSB event – the **Transmission Company** will post a System Warning message on the Balancing Mechanism Reporting System (BMRS) to inform the industry;
- 13 Settlement Days following a DSB event – the **Transmission Company** will request MSID data from HHDCs for sites that were requested to reduce consumption during the DSB event, plus data for a selection of 10 other dates;
- 5 WDs – the **HHDC** will collate and send the data for each effected site for the dates specified by the Transmission Company in its request;
- The **Transmission Company** will review this data and follow up with relevant HHDCs if required.
 - 5 WDs - If follow up requests are required, **HHDCs** will have a further 5 WDs (for each follow up request) to provide additional data or information.

Further detailed information on the processes and timescales listed above can be found in the draft [BSCP502](#) 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' redlining in Attachment B.

Proposed data format

The data required under P299, which will be submitted by relevant HHDCs to the Transmission Company, will need to be in the format that is currently required in the Data Transfer Catalogue (DTC) flow [D0036](#) 'Validated Half Hourly Advances for inclusion in Aggregated Supplier Matrix'. BSC Section S Annex S-2 refers to this flow as the Suppliers' Metering System Metered Consumption report.

Further information about the expected format and content of the data that needs to be provided to the Transmission Company can be found in Appendix 1.

Estimated central implementation costs of P299

The estimated ELEXON effort to implement P299 equates to £240 (or one man day). The ELEXON effort required is to update the relevant documents impacted by the P299 solution and to oversee its implementation.

Potential industry costs of P299

It is anticipated that there will be industry costs associated with P299, as the proposed solution will require HHDCs to generate ad-hoc reports, which will need to be sent to the Transmission Company to support the operation of the DSB service.

Respondents to the P299 Assessment Consultation noted a range of potential costs associated with the collection of historic data requests including minimal, £5k per HHDC and £150 per request.

P299 impacts

Impact on Party Agents

The P299 solution will impact **HHDCs** as it will require HHDCs to generate additional ad-hoc reports to send to the Transmission Company. Respondents to the P299 Assessment Consultation noted impacts due to:

- development of reports;
- manual operational processes; and
- implementation and training.

Impact on BSC Parties

It is expected that some **Suppliers** will be indirectly impacted (from a BSC process perspective) due to:

- the time and resource required for HHDCs to produce these ad-hoc reports;
- the time and resource required to ensure necessary contractual arrangements are in place between the Supplier and HHDC for the provision of the required data to the Transmission Company; and
- potential changes to Suppliers' position at Gate Closure (as a result of DSB).

Impact on Transmission Company

There will be no direct impact on the Transmission Company. However, P299 will allow the Transmission Company and its agents to use Suppliers' Metering System Metered Consumption data to validate submitted tender data and to process the settlement payments for the delivery of the new DSB service. If P299 is not approved there could be a negative impact on security of supply as it would disrupt and delay the implementation of DSB.

Impact on Code	
Code Section	Potential Impact
Section L	Changes will be required to implement the solution.

Impact on Code Subsidiary Documents	
CSD	Potential Impact
BSCP502	Changes will be required to implement the solution.

Recommended Implementation Date

The Workgroup recommends an Implementation Date for P299 of:

- **10 Working Days** following the Authority's decision

The Transmission Company aims to begin tendering for the DSBR service in late July/early August 2014 for the November 2014 to February 2015 winter period. Therefore, the proposed Implementation Date for P299 is driven by the starting point for the DSBR tendering process. Similarly, the start of this tendering process relies on the swift implementation of P299.

The Workgroup initially recommended an Implementation Date of 26 June 2014 with a fall back date of 10 WDs following the Authority's decision. In its Assessment Consultation response the Transmission Company requested that the Implementation Date be changed to just 10 WDs following the Authority's decision. This is because the Transmission Company wanted the flexibility to launch the tendering process for DSBR sooner, so far as P299 is approved. The Workgroup agreed with the new proposed Implementation Date as it would not interfere with the industry's implementation of the P299 technical solution.

What data is required to support DSBR?

The P299 Workgroup has considered what data is required to support the Transmission Company in the operation of the new DSBR service.

The P299 Proposer advised the Workgroup that the Transmission Company requires historic HH MSID level data for sites that could reduce demand or increase generation at times of system stress. This data would only be required from those who wished to tender for the DSBR service. It was also noted that this would be a one off request for each new tender in order to validate the capabilities of each site.

If and when the DSBR service is called, the Transmission Company will require a further data submission for each of the affected sites. This request will include the provision of data for the date the service was called along with 10 peak demand days (as defined by the Transmission Company in its request). This data is required by the Transmission Company to process settlement payments for the DSBR service. A similar data submission may be required in the event that a testing exercise is undertaken for individual DSBR providers. A test sample from DSBR providers may be expected each winter.

Use of historic data

A Workgroup member questioned why the Transmission Company needs historic data and how it will be used to validate potential sites. The Proposer responded that the historic data will be used to form a baseline of typical demand during peak demand conditions. This will help the Transmission Company determine whether the demand reduction offered for the DSBR service is consistent with the level of demand taken at the site. Another Workgroup member noted that the use of this historic data will help the Transmission Company understand the current state of potential sites and investigate any shortfalls in data (between the data requested and the data submitted by an HHDC). For example, a tender may expect a site to be suitable for the DSBR service but the site has been de-energised resulting in a shortfall of data. Similarly, if there has been a change of agent (HHDC) during a winter period for which data is being submitted for, there will also be a shortfall in data. The Proposer added that the use of this historic data will make the tendering process more robust and will ensure that the sites used as part of the DSBR service are capable of delivering the service as expected.

Another Workgroup member questioned why the Transmission Company, in asking tenders for this historic data, required only a 'winter's worth' of data. The Proposer responded that if the DSBR service is called it will only be called during a winter period, when demand is at its highest. Therefore, the Transmission Company only needs historic data from November to February. As an example, if the Transmission Company were to request historic data for the use of DSBR in the 2014/15 winter period, it would only request historic data spanning November 2013 to February 2014.

The Workgroup agreed that it supported the request for data in order to settle payments for involvement in a DSBR event. As the use of this data would ensure monies settled are done so accurately and efficiently. However, the Workgroup also agreed that it was the request for historic data that had the most impact and therefore questioned the benefit of obtaining it. The Proposer reiterated that the historic data will be used by the Transmission Company to form a baseline of typical demand during peak demand conditions, making the tendering process more robust. It will also ensure that the sites used as part of the

DSBR service are capable of delivering the service as expected. The Proposer added that the Transmission Company would not look to remove the requirement for HHDCs to provide historic data from the proposed solution.

Submission of estimated consumption data

A Workgroup member asked the Proposer if the Transmission Company required actual data to support DSBR, as HHDCs may only be able to provide estimated data at the time of the request. Another member added that the submission of estimated data may not be an issue for historic data used to validate tenders. However, it could be an issue for any further data required to process settlement payments for the DSBR service. The Workgroup agreed that actual data will be required for any day on which DSBR is called and that any use of estimates may be an issue in this case. The Proposer responded that estimated data for the validation of tenders should be fine and agreed with the Workgroup's view that estimated data for processing settlement payments for DSBR is an issue that the Transmission Company needs to consider.

A member noted that the electricity market runs on estimates for a number of reasons, one being the 14 Month BSC Reconciliation Settlement process, and that requiring actual data shortly after a DSBR event may not be possible. Another member added that, as an HHDC, data can change across the whole 14 month window. This means that when the Transmission Company requires data to process settlement payments the data provided may become inaccurate over time due to the 14 Month Reconciliation Settlement process.

A Workgroup member noted that, given the potential impacts estimated data could have, it would be prudent to include a flag so that HHDCs can inform the Transmission Company that the data submitted is estimated not actual. The Proposer and the Workgroup agreed that this was a sensible solution requirement. As noted below this requirement will be delivered through the use of the D0036 flow which has a field indicating whether the metered data is an estimate or actual reading.

The Workgroup questioned whether the use of estimates would result in follow up data requests to the HHDC from the Transmission Company. The Proposer reiterated that the Transmission Company will need actual data to ensure that payments for the DSBR service are processed correctly. This means that the Transmission Company may issue follow up requests throughout the whole 14 month window to ensure that these payments are correct.

A Workgroup member questioned if a change will be required to the existing estimation methods in BSCP502 Section 4. Another member responded that they didn't see why a change would need to be made as DSBR is a temporary service so it would not be pragmatic to make a change to these methods. The Proposer and Workgroup agreed with this view and that any estimated data submitted to the Transmission Company for the use of DSBR will be calculated using the existing estimation methods detailed in BSCP502. In addition, by flagging that the data provided is estimated it will prompt the Transmission Company to request updated data at a later date.

Format of submitted data

The Workgroup questioned what format the data submitted to the Transmission Company needed to be in. A Workgroup member asked the Proposer if the Transmission Company had a format in mind. The Proposer responded that there had been discussions around the format (and content of required data). The Workgroup discussed the required data and agreed that it is similar to that contained within the existing DTC D0036 data flow.

A Workgroup member noted that their organisation tries to store such data in line with the standard DTC flow format. This ensures efficiency when data needs to be pulled from their systems. Another member added that systems vary across all HHDCs, though having this data submitted in a similar format to the D0036 means it may be easier for HHDCs to collate the data when compared to using a new format.

A respondent to the P299 Assessment Consultation noted that, if data submitted under P299 is in a format similar to that of the D0036 flow, further consideration should be given to the formal format of the flow. For example, the inclusion of headers and footers would improve the Transmission Company's ability to automate receipt, validate and identify anomalies in the data submitted. A Workgroup member noted that the headers included in a D0036 flow provide useful information (including the sender and the date the file was generated). The member believed that it would be sensible to include the header and footer as it will be easier for the Transmission Company to process the data it receives. The Proposer responded that the Transmission Company is happy for HHDCs to include a header and footer in their data submissions if this is something that would already be generated. The Proposer added that the Transmission Company will work its systems around what is easier for HHDCs.

A Workgroup member noted that the Transmission Company asked for dummy data to get a better view of what it would receive from HHDCs. The member noted that the dummy data it provided included a header and footer. The Proposer responded that the Transmission Company was happy with the format of the dummy data provided. The Proposer and the Workgroup agreed that the data submitted by HHDCs should include a header and footer. This would be achieved by using the headers and footers that would be contained in the D0036 flow when putting together the data request to the Transmission Company.

ELEXON advised the Workgroup that there was a general view in consultation responses that sending the required data in a format close to that of the D0036 was appropriate. However, it was noted by those who agreed with this format that it will be more efficient to send an entire day's worth of data (in reference to historic data) as opposed to data for Settlement Periods between the hours of 4pm and 8pm.

A Workgroup member noted that the impact of extracting historic data for Settlement Periods between the hours of 4pm and 8pm will depend on how individual HHDCs systems operate. The member added that its HHDC systems mean that extracting this historic data will be a very manual process. This is because; in order for data between the hours of 4pm and 8pm to be extracted someone needs to make a request for each MSID for each individual Settlement Period for each Settlement Day. This will have a much higher impact than just pulling the data for an entire day for each MSID. Similarly, the member added that if the Transmission Company only asks HHDCs to provide historic data for workdays and non-bank holidays over a winter period, someone will have to make 77 requests per MSID.

The Proposer asked the Workgroup what approach would be the easiest for HHDCs. A Workgroup member stated that the best approach to take is for the Transmission Company to request data for every single day in a winter period (including weekends and bank holidays) and that it should be an entire days worth of data for each day. Other Members agreed that this would be the better approach to take. The Proposer agreed with this view and noted that the Transmission Company will do what's easiest for the industry and will ensure its systems can extract the data it requires.

Appendix 1 contains an example of the required data and the expected format of this data.

What are the processes & timescales for collecting the required data?

The Workgroup asked the Proposer what the process would be for collecting the required data. The Proposer responded that the Transmission Company would submit requests to HHDCs who would collate the required data for each MSID it holds data for and send it back. One Workgroup member asked how quickly the Transmission Company expected an HHDC to respond with the required data. The Proposer stated that a 5 WD turnaround time was suggested as part of the initial analysis of this process.

Some Workgroup members were concerned about how feasible it will be for an HHDC to turn around such a request in 5 WDs. One member noted that there are a number of things to consider when it comes to the timescales associated with this process. If a site does not have the required communications installed (or the communications are not working) it could be difficult for an HHDC to obtain this data quickly (i.e. remotely). There is also potential for unforeseen faults on these sites. A member used the recent flooding across the UK as an example of this, stating that such flooding could mean that Meters on sites could be beyond repair and it may take time for these Meters to be replaced. Such events could result in an HHDC being unable to gather the required data in time. It is worth noting that if actual Meter reads cannot be obtained then DSBK cannot be provided.

Another member questioned whether HHDCs will need to validate the data before it is submitted to the Transmission Company. The member believes that if an HHDC is required to validate the data there may be more than a 5 WD turnaround time required. The Workgroup asked the Proposer if the Transmission Company wanted validation done prior to receiving this data or if having the HHDC collate and submit the data as is will suffice. The Proposer responded that they could not see why the Transmission Company would require HHDCs to validate this data if it could potentially result in more time and resource from HHDCs. The Transmission Company initially proposed that it would send all the MSIDs for which it require data for to all HHDCs (along with the dates and Settlement Periods required) with HHDCs supplying data only for those MSIDs for which they hold information. During the Workgroup's review of the P299 Assessment Consultation responses it was agreed that the Transmission Company will only request historic tender data for MSIDs relevant to an HHDC and only for the dates the HHDC is appointed. Further information about these discussions can be found in the 'P299 Assessment Consultation Responses' portion of this section.

It was noted by a Workgroup member that the volume of MSIDs, for which each relevant HHDC will need to gather data on, would have an impact on timescales. For example, if an HHDC is required to collate data for just a few MSIDs, volume will not be an issue. However, if an HHDC is asked to collate and submit this data for 100 MSIDs, volume may become an issue. The Workgroup questioned whether it would be possible for the

Transmission Company to estimate the number of MSIDs for which data may be required. Initially the Proposer responded that it will not be possible to estimate the total number of MSIDs which may provide a DSB service but following the meeting more detail was provided and the Transmission Company advised that several thousand MSIDs may be involved. The Workgroup considered that estimating such volumes, and even estimating a number of MSIDs based on tenders, could be difficult for the Transmission Company.

The Workgroup agreed that, given these unknowns, putting in place a 5 WD turnaround time for HHDCs to respond to the Transmission Company's initial historic data request (for the validation of tenders) and any other requests for processing payments may be sufficient.

Following the first Workgroup meeting, the Proposer informed ELEXON (who informed the rest of the Workgroup) that, acknowledging the numerous caveats involved, the Transmission Company estimated the number of Metering Systems it will request data for to be 'a few thousand'. Although this number seems high, it includes all of the MSIDs that are less than 1MW that may be targeted by aggregators, as the Transmission Company needs the required data at an MSID level for those greater than 1MW. It is worth noting that there is a 1MW threshold associated with DSB and historic data will only be required for the initial 'post tender assessment' stage. For the 'post DSB event' stage the data required would only be requested for sites affected by the event.

A Workgroup member questioned whether HHDCs would be able to submit 'test' data to the Transmission Company to ensure that requested data will be submitted as expected. The member added that any such test period would need to be factored into the tendering process and should be considered by the Transmission Company. This will help mitigate the risk of data being sent in different formats due to HHDCs interpreting the format differently. The Proposer initially agreed that it would be beneficial for the Transmission Company to consider including a test period in the tendering process. However by using the D0036 flow format, and having the agents provide data for all Settlement Periods for all Settlement Days requested, will remove the need to test the format of data provisions as it should be consistent across all HHDCs.

Post DSB event data requests

A Workgroup member asked the Proposer how long the Transmission Company will wait before issuing an initial 'post DSB event' data request to the relevant HHDCs. The Proposer asked the Workgroup what it believed a sufficient amount of time would be. A Workgroup member responded that if data is requested on D+1 (the first day after a DSB event) the HHDC may not be able to get actual data within the 5 WD turnaround time previously agreed by the Workgroup. The member added that HH Settlement data on D+3 (3 days after a DSB event) is 95% accurate and the same data on D+13 is 99% accurate. Therefore, the longer the Transmission Company waits to request 'post DSB event' data the more accurate the data will be. The Proposer advised ELEXON (who advised the Workgroup) that the Transmission Company's preference would be to wait until the D+13 stage before requesting any 'post DSB event' data to ensure payments are based on the most accurate figures.

A Workgroup member wondered who would be responsible for initiating any required follow up requests (to ensure data provided for payments is accurate). The member believes that it will be more efficient for the Transmission Company to initiate these requests, whether these consist of a set number or a series of ad-hoc requests. Requiring HHDCs to monitor impacted MSIDs for changes may require system changes and

additional resource to ensure that a change in the data submitted is picked up and then passed on to the Transmission Company. Other members of the Workgroup agreed with this view and noted that the obligation to follow up on estimated data should sit with the Transmission Company. The Proposer agreed with the Workgroup's view that requiring HHDCs to monitor MSIDs for data changes would not be the most efficient way to follow up submitted data. Therefore, the Proposer agreed that any follow up requests would be instigated by the Transmission Company, with each request having the same response timescale (i.e. 5 WDs).

A Workgroup member suggested that the Transmission Company may want to have a set number of follow up requests over a set period of time. This would be the most efficient way for the Transmission Company to know when to request updated data from HHDCs. The Proposer and the Workgroup agreed with this view as having a set number of requests over a set period would allow the Transmission Company and HHDCs to manage their time and resource. The Proposer asked the Workgroup members for their views on the number of requests required and the timing of those requests.

It was suggested that the requests run in line with the different Settlement Runs. This would mean that the Transmission Company would request updated data in line with the Settlement process (which ensures that Settlement data becomes more accurate as time goes on). The Proposer and Workgroup agreed with this view. Therefore, any follow up data requests by the Transmission Company will tie in with the Settlement Runs for the relevant Settlement Dates.

What security measures will be followed to ensure data is collected and held securely?

The Workgroup questioned what security measures will be in place to ensure that the data collected is held securely and that the integrity of the data is kept intact.

The Transmission Company has developed a comprehensive suite of policies, standards and guidelines to ensure compliance with its privacy and information security obligations. These obligations are based on [ISO 27001](#), which is a code of practice for Information Security Management, though the Transmission Company does not formally hold this certification. The Transmission Company's Policies and Standards are reviewed on (at least) an annual basis and are available to all employees and contractors through the company's intranet site and to relevant vendors through the on boarding process.

In addition to this, the Transmission Company has a number of obligations under the Transmission Licence that are designed to protect any third party information that it receives (e.g. Connection and Use of System Code (CUSC) Section 6.15). With respect to the BSC, [Section H 'General'](#) paragraph 4.4 'Confidentiality for the Transmission Company' places obligations on the Transmission Company in relation to Protected Information by Business Personnel.

The Transmission Company treats all information in confidence and in accordance with the Data Protection Act (1999). The Proposer has assured the Workgroup that all appropriate technical, organisational and contractual measures are in place to ensure that personal data is held securely, as required under the Seventh Data Protection Principle of the data Protection Act.

The Workgroup was confident that the security measures the Transmission Company has in place will ensure that the data collected for use with DSBRE will be secure and the integrity kept intact.

What changes are required to support P299?

The Workgroup considered what changes will be required to the BSC and other Code Subsidiary Documents to support P299.

ELEXON suggested that minor amendments be made to BSC Section L so that the Transmission Company can use the required data for the operation of DSBRE. It was also suggested that, depending on the amount of data the industry may want around process, timescales and data content/format, the draft BSC Section L changes should reference BSCP502. That way BSCP502 can be amended to capture the more detailed aspects of the P299 solution.

The Proposer and the Workgroup agreed that this was the most efficient approach. A Workgroup member added that DSBRE is a temporary service to ensure that the lights stay on while the industry waits for the implementation of the Capacity Market arrangements. Therefore, only minimal changes should be made to the BSC to make it as future proof as possible.

A Workgroup member noted that they do not believe that BSCP502 is an appropriate place to detail the P299 solution requirements. This is because having HHDCs send data to the Transmission Company to support DSBRE is outside the SVA arrangements and BSCP502 covers processes associated with the SVA arrangements. The Workgroup member believed that consideration needs to be given to potential implications of detailing the P299 solution in BSCP502 (in relation to process assurance). Another Workgroup member added that by laying out the detailed process steps and timescales of the P299 solution in BSCP502, they would be subject to the BSC Audit. Therefore, ELEXON will have to consider these processes when conducting Performance Assurance Framework (PAF) Audits.

Another Workgroup member responded that they did not think it inappropriate to place details of the P299 solution in BSCP502 in the absence of another location. Other members of the Workgroup agreed that whilst BSCP502 may not be the most appropriate location, for the purposes of the P299 solution it sets out the required process steps in sufficient detail.

The draft changes to BSC Section L (Attachment A) and BSCP502 (Attachment B) can be found attached.

What are the impacts on BSC Parties and Party Agents?

The Workgroup considered what impact there may be on BSC Parties and Party Agents due to the implementation of P299.

The Workgroup discussed the impacts on HHDCs, as detailed above. Some members were concerned that there are still a number of unknowns around the DSBRE service. For example, the number of MSIDs for which an HHDC will need to provide data on, expected demand reduction volumes if DSBRE is used and the number of tenders that may sign up to the DSBRE service. The Workgroup believes that it is important to consider the impact on HHDCs individually and collectively.

Issues with contractual arrangements

The Workgroup also discussed potential impacts on Suppliers due to HHDCs having to provide data to the Transmission Company under P299. A Workgroup member noted that HHDCs provide a service to Suppliers by managing relevant MSIDs. The member believes that requiring HHDCs to spend time and resource providing data to support DSBRE may not sit well with some Suppliers. This is because Suppliers pay HHDCs for their time and resource and by providing data to the Transmission Company HHDCs may prioritise this request over other Business As Usual (BAU) activities. Therefore, if the Transmission Company requests an HHDC to provide data to support DSBRE, the Supplier will end up paying for it (and ultimately pass any cost on to consumers).

A Workgroup member asked the Proposer if the Transmission Company planned on paying HHDCs directly for providing the required data. The Proposer responded that it was not the Transmission Company's intention to do so. Another Workgroup member added that they were under the impression that, as a HHDC, they would be paid for providing this data.

A Workgroup member noted that because this will not be a paid service, associated costs will be covered by Suppliers. Although addressing such implications is outside the scope of P299, the Workgroup agreed that such impacts on Suppliers need to be considered nonetheless. The Workgroup's discussions on associated costs on Suppliers and other contractual arrangement issues are noted in the below subsection 'P299 Assessment Consultation Responses'.

A Workgroup member noted that one respondent to the Assessment Consultation believed that it would only need 4-8 weeks lead time to implement the 'technical' solution. However, there would need to be at least 12 months lead time in order to put in place any required agreements to support commercial arrangements. This is because HHDCs will look to charge Suppliers for their work in providing data to the Transmission Company. If Suppliers are to be charged then HHDCs will need to have commercial arrangements agreed with all HH Suppliers before any work can commence.

A Workgroup member noted that it may be possible for the 'technical' solution to be implemented but, given the timescales, it may not be possible to implement any supporting commercial arrangements in time for the historic data to be provided following the end of tender window. The Proposer advised the Workgroup that they did not believe this was a big issue and noted that they do not think there is a need for Suppliers to have a contract in place with HHDCs. Another Workgroup member added that if Suppliers are going to be charged by HHDCs for this service there is a risk that the Supplier will end up being non-compliant. This is because the P299 solution requirements and timescales are detailed in BSCP502 (including the tendering process and the 'post DSBRE event' process) and the process in the BSCP will be subject to the BSC Audit. The industry cannot place obligations on Party Agents in the BSC. Therefore, by putting the detailed solution into BSCP502, Suppliers will ultimately be obligated to ensure its HHDCs provide the required data to the Transmission Company. This will mean there is a potential risk for non-compliance as, if a Supplier says it will not pay its HHDCs for providing the service to the Transmission Company, the HHDC could then turn around and say it will not provide the data. This means that the Supplier is left needing to either pay for the non-SVA service or risk being non-compliant with the BSC. Another member added that, as a Supplier, it did not believe it would be right to have to pay for a non-SVA related activity. Other members of the Group agreed with these views. The Proposer believes that such issues are minor

when compared to the overall benefit of DSBR, which will 'keep the lights on' should there be a time of high system stress in the next couple of years. The Proposer has voiced concerns that these issues will get in the way of the DSBR service being implemented. A member advised the Workgroup that because the implementation of the P299 solution may result in Suppliers being non-compliant they were unable to support the approval of P299.

ELEXON advised the Workgroup that a respondent to the Assessment Consultation noted that there may be issues with Suppliers not being able to validate an HHDC's bills submitted to the Supplier for services provided to the Transmission Company. A Workgroup member commented that Suppliers will have no visibility of how much time and resource will be spent on a historic data request and any follow up requests by the Transmission Company. The Workgroup member echoed the consultation response that, as a Supplier, they will not be able to validate the bills sent through by HHDCs. Another Workgroup member added that there may be further complexity as each HHDC may bill differently, some based on the number of MSIDs and others on the number of requests etc. It was added that there will even be different billing mechanisms among HHDCs. This means that it may be impossible for a Supplier to validate a bill when it has no visibility of the number of MSIDs or the number of follow up requests and HHDCs using non-uniform billing. Another member noted that the Transmission Company estimated that it may need to request historic data for several thousand MSIDs.

A Workgroup member stated that, due to the unknowns around the number of follow up requests and MSID volumes, there is a greater risk that appropriate contractual arrangements will be difficult to put in place. This will in turn increase the risk of non-compliance with the processes introduced by the P299 solution.

Impacts on Supplier position at Gate Closure

The Workgroup considered how the use of DSBR may impact a Supplier's position at Gate Closure. Although addressing such an impact is outside the scope of P299, the Workgroup agreed that it should be discussed and considered.

The Proposer advised the Workgroup that at times of system stress, a Supplier with sites affected by the use of DSBR may find that its position at Gate Closure is longer than expected. This is because these sites will not have consumed as much energy as predicted, as a DSBR event may result in the Transmission Company requesting these sites to reduce consumption. Given that DSBR will be called when the system is short, the System Sell Price (SSP) (under the current rules) would be set by the Market Price. It is likely that this price will be high given the shortage. This means that there is potential for a DSBR event to not have a detrimental financial impact on a Supplier whose customer(s) were called and responded. The Proposer added that if a DSBR event was called, resulting in a Supplier's position at Gate Closure being longer than expected, there would be 30 minutes to trade out the expected reduction in demand if as noted below, affected Suppliers are notified when DSBR will be used.

How will the industry be informed of a DSBR event?

The Workgroup considered how the industry would be informed of a DSBR event and how a Supplier would know if one of its sites was affected.

The Proposer advised the Workgroup that ideally a System Warning message will be posted on the BMRS at least two hours prior to a DSB service taking place. There is a possibility of a DSB service being called at shorter notice. However, a BMRS warning will still be issued before the event is called. ELEXON asked the Proposer how the Transmission Company will inform a Supplier that one or more of its sites had been affected. The Proposer advised that the Transmission Company, in tendering for the DSB service, will have developed a relationship with DSB providers and may know who the relevant Supplier is (and if or when it changes). As part of the tender process the Transmission Company may, on request, be able to advise Suppliers which of its customers will potentially be providing a DSB service (assuming the Supplier information is captured during the tender process).

Systems and processes are currently being developed to support the DSB service and the settlement of DSB. The Transmission Company may, on request, be able to provide a Supplier the volume of DSB provided by its customers. However, Suppliers can change meaning the Transmission Company may not have access to this data. This may therefore present a real challenge in being able to provide Supplier level data for any DSB response. The Transmission Company will know more about this as it better understands the systems and data it will have access to. If Suppliers have requested details during the tender process, as to which of its customers may be supplying a DSB service, the Supplier will be able to contact its customers directly for information on any DSB response.

Alternative Solutions to P299

Formally embedded solution

The Workgroup considered the responses submitted to the P299 Assessment Consultation. A Workgroup member felt that one consultation respondent wanted P299 to have a more formally embedded solution (for example, making use of the Data Transfer Network (DTN) to transfer the required data to the Transmission Company). The member commented that, due to DSB being a temporary service, the Workgroup should focus on the least invasive and cost effective way for HHDCs to send the required data to the Transmission Company. The member added that they do not believe that a more formal approach to P299 is required. Other members of the Workgroup agreed with this view.

Additional BM Units

A Workgroup member noted that some of the respondents made comments that related more to the Capacity Market under the Electricity Market Reform (EMR) arrangements than to P299. For example, one respondent noted that additional Balancing Mechanism (BM) Units are a convenient way of isolating MSID data in a controlled manner and that this could be an alternative way to collect the required data under P299. However, the Workgroup member believes that this would not be an appropriate solution given that DSB is a temporary service and that asking the industry to have an additional BM Unit for potentially thousands of MSIDs would not be practical. The other Workgroup members agreed with this view.

Obtaining the required data from LDSOs

A Workgroup member noted that a few respondents to the Assessment Consultation suggested that it would be worth considering obtaining the required data from License Distribution System Operators (LDSOs). Another member added that LDSOs will have access to all D0036 flows sent and will have the full range of data, which would be particularly useful for obtaining the historic data. A further member agreed and stated that LDSOs are considered a consistent data source because each LDSO will have all the D0036s for each MSID for all Settlement Days, removing the need to split data requests by HHDC for the periods there were an appointed to an MSID. If used to obtain this data there could be an addition made to [BSCP550](#) 'Shared SVA Metering Arrangements of Half Hourly Import and Export Active Energy' to state that LDSOs must send this data to the Transmission Company. The Proposer voiced concerns about using the LDSO to obtain historic data, as it would add another Party to the processes. If a follow up request were required, due to gaps in the data, the Transmission Company would still need to contact the relevant HHDC and not the LDSO. Therefore, the Proposer felt that it would create additional steps and process complexity.

A member advised the Workgroup that if an LDSO does not have the information it will likely not exist and did not think that any follow up requests would be required if the data is obtained from LDSOs. Another member added that if data is provided by the LDSO the potential issue of overlapping data (due to a change of agent) being received will likely disappear as a single LDSO will have all the required information.

A Workgroup member noted that, even taking the discussions into account, LDSOs may not have a mechanism in place to generate the required files as they only receive the D0036s. This means that there may be costly system changes required for them to set up the means to extract and send the data to the Transmission Company. The Workgroup member therefore believes that it would not be practical to get the required data from LDSOs.

A Workgroup member stated that using the LDSO to provide the required information to the Transmission Company is an alternative worth considering. The member added that, as a Workgroup, it was agreed that the necessary data will exist in LDSO systems and agreed that there would be less issues with date ranges and change of agents. However, this approach has not been put to the industry. Another member agreed and stated that there may be cost savings due to there being no need for follow up queries and consequently no charges to Suppliers. However, this may not matter as the cost of LDSOs changing their systems and in turn requiring payment for the provision of the data may result in costs being shifted between different parties.

ELEXON noted that, in spirit of the Modification process, an alternative solution needs to be considered with both the Applicable BSC Objectives and the proposed solution in mind. This means that if the Workgroup wish to put an alternative solution to the Panel it would need to better facilitate the Applicable BSC Objectives against the current baseline and be better than the proposed solution. A Workgroup member added that in order for the Workgroup to appropriately consider this as an alternative solution there needs to be an industry consultation. Another Workgroup member noted that, taking into account the timescales of the P299 Assessment Phase and the timescales associated with the DSBR tender process, there is not sufficient time to consult on an alternative solution. However the member believes that a lot of the issues raised during the Assessment Consultation

around the proposed solution would likely be raised again but this time with additional concerns around the impacts on LDSOs.

The Workgroup agreed with these views and decided that using the LDSO to obtain the required data to support DSBR should not be taken forward as an alternative solution.

Third party involvement

A Workgroup member stated that if DSBR was to be a permanent service they could see how it may be more efficient for the Transmission Company to use third party to help operate the service. This is because there are organisations in the industry that specialise in collecting and processing data. However, the fact that DSBR is a temporary service means that the Transmission Company collecting and processing the data and payments seems to be the more pragmatic approach.

The Workgroup agreed with this view and chose not to raise this as an alternative solution.

Approaches not requiring a BSC Modification

The Workgroup discussed how there were other approaches that the Transmission Company could adopt to obtain the necessary data required. Such approaches would not require a Modification as they would involve the Transmission Company paying HHDCs or Suppliers directly to provide the required information.

Additionally the Workgroup considered whether the Transmission Company could obtain the required data from the Data Transfer Service (DTS). However, the DTS only contains the D0036 data that has been sent over the DTN and not flows sent internally within organisations. This means that the data held by the DTS would only cover 85% of the data that the Transmission Company require. Therefore, this approach was discounted as a viable option.

Workgroups views on the Applicable BSC Objectives

The Workgroup has given its views on P299 against Applicable BSC Objectives. These views have been captured below and a table summarising the views against each Applicable BSC Objective has been included at the end of this section.

Applicable BSC Objective (b)

The Workgroup unanimously believes that P299 better facilitates Applicable BSC Objective (b) as it ensures that the DSBR tender submission data can be correctly validated (i.e. through historic data submissions) and that the settlement of payment is fully supported.

Applicable BSC Objective (c)

A majority of the Workgroup believes that, because DSBR may leave a Supplier's position at Gate Closure longer than expected there is a detrimental impact on competition. This is because some Suppliers may benefit from a longer position at Gate Closure (as detailed in Section 6) if their customers participate in a DSBR event.

A minority of the Workgroup believe that there is a further detrimental impact on competition as Suppliers pay for HHDCs to provide the required data to the Transmission Company. However, Suppliers are not getting any benefit from it unless their sites are affected and their position at Gate Closure is longer than expected, affecting competition.

The Proposer feels that there will not be a detrimental impact on competition due to the implementation of P299. This Modification was raised to allow the Transmission Company to gain access to metering consumption data to support the DSBR service, which in itself is not anticompetitive. The Proposer believes that the Workgroup's views are against the wider DSBR service activities and not relevant to the Transmission Company's access to relevant data.

In addition the Proposer noted a Workgroup view that Suppliers will be paying HHDCs to collect this data without gaining any benefit. The Proposer believes that the potential costs incurred by Suppliers would be minor, when compared to the benefits of supporting the DSBR service, and are therefore not detrimental to competition. The Proposer believes that the positive impact of a Supplier's position lengthening at Gate Closure is an incentive to ensure its customers tender for the DSBR service, promoting competition. The SSP (under the current rules) will be set by the Market Price; it is likely that this price will be high given the shortage in generated electricity during a DSBR event.

Applicable BSC Objective (d)

The majority of Workgroup members believe that if P299 is implemented there will be a detrimental impact against Objective (d). This is because there is a risk that Suppliers may become non-compliant with the BSC Audit processes. This is due to the industry being unable to get supporting contractual arrangements agreed in time (i.e. by the end of the tender process) as discussed in Section 6 of this document. Not getting these arrangements in place may result in Suppliers being unable to validate and therefore agree payment to HHDCs for time spent supporting the DSBR service. This in turn may result in HHDCs not providing the required data to the Transmission Company as they will not get



What are the Applicable BSC Objectives?

(a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence

(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System

(c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity

(d) Promoting efficiency in the implementation of the balancing and settlement arrangements

(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]

paid for the work. Obligations cannot be placed on BSC Agents under the BSC so it will therefore be the Suppliers that have to choose between paying for a non-SVA related activity or risk being non-compliant.

The majority of the Workgroup agreed that because costs will be incurred in the implementation of P299 there is a minor detrimental impact against Objective (d).

The Proposer does not agree with the Workgroup's view that there is a detrimental impact against Objective (d). The Proposer does not believe that new contracts need to exist between an HHDC and a relevant Supplier. The Proposer also believes that, if there is a view that risks need to be covered off, a simple 'Letter of Understanding' could be put in place pending any such contract amendments being adopted. The Proposer believes the detrimental impacts noted by the Workgroup are minor and should not get in the way of the implementation of P299, which is required to support the already approved DSB service.

The Proposer believes that the incremental costs associated with P299 are very small. The Proposer also believes that there will be more costs incurred due to recording time, establishing contracts and processing invoices and payments outside of P299 than will be incurred in providing these reports under the P299 solution.

Summary of views against the Applicable BSC Objectives

In conclusion, the Workgroup expressed the following views:

- Unanimous view that P299 would better facilitate Applicable BSC Objective (b);
- Majority view that the detrimental impacts against Objectives (c) and (d) outweigh the benefits against Objective (b);
- Minority view that the benefits against Objective (b) outweigh the detrimental impacts against (c) and (d).

Therefore, the final majority Workgroup view is that P299 does not better facilitate the Applicable BSC Objectives so the Workgroup recommends P299 is rejected.

The following table contains a summary of the Proposer's and the Workgroup's views against each of the Applicable BSC Objectives:

Does P299 better facilitate the Applicable BSC Objectives?		
Obj	Proposer's Views	Other Workgroup Members' Views ⁶
(a)	• Neutral – No impact.	• Neutral – No impact.
(b)	• Yes – The proposed solution would ensure that DSB tender submission data can be correctly validated and the settlement of payment process is fully supported.	• Yes (unanimous) – Agree with the Proposer.
(c)	• Neutral – No impact.	• No (unanimous) – Although P299 does not have a direct impact on competition the Modification supports the DSB service, a service that may have minor detrimental impacts on

⁶ Shows the different views expressed by the other Workgroup members – not all members necessarily agree with all of these views.

Does P299 better facilitate the Applicable BSC Objectives?		
Obj	Proposer's Views	Other Workgroup Members' Views ⁶
		<p>competition as some Supplier's may benefit from a longer position at Gate Closure.</p> <ul style="list-style-type: none"> • No (additional minority view) – Suppliers pay for HHDCs to provide this data to the Transmission Company. However, they are not getting any benefit from it unless their sites are affected and their position at Gate Closure is longer, as noted above.
(d)	<ul style="list-style-type: none"> • Neutral – No impact. 	<ul style="list-style-type: none"> • No (majority) – If P299 is implemented there is a risk that Suppliers may become non-compliant. This is due the industry being unable to get supporting contractual arrangements agreed in time (resulting in Suppliers not being able to validate and agree payment to HHDCs for work to support DSBR). Therefore, HHDCs may decide not to provide the required data to the Transmission Company. • No (unanimous) – Although P299 does not have a direct impact on the efficient implementation of BSC arrangements, there will be costs associated with its implementation, resulting in a minor detrimental impact against this Objective.
(e)	<ul style="list-style-type: none"> • Neutral – No impact. 	<ul style="list-style-type: none"> • Neutral – No impact.

Assessment Consultation respondents' views on P299 against the Applicable BSC Objectives

ELEXON received nine responses to the Assessment Consultation, of which six agreed with the Workgroup's view that P299 better facilitates Applicable BSC Objective (b) as the Modification will allow the Transmission Company to implement the DSBR service in a timely and efficient manner. In addition, one respondent did not believe P299 better facilitated the Applicable BSC Objectives and two respondents were neutral.

One respondent believes there is a minor detrimental impact on Objectives (c) and (d) as Suppliers will incur costs due to HHDCs providing the required data to the Transmission Company and costs will be incurred due to the progression of the Modification.

One respondent believes that the overall benefits against Objective (b) outweigh the minor detrimental impacts against Objectives (c) and (d).

You can find the full collated Assessment Consultation responses in Attachment C and the Transmission Company's response in Attachment D.



Recommendation

The BSC Panel initially unanimously recommends that P299 should be approved

Panel's discussions on P299

A Panel Member raised the question around the case for DSBR and the impacts it may have on Suppliers at Gate Closure (i.e. a Supplier could be 'long' at Gate Closure if sites they supply reduced demand in the event of the DSBR process being deployed. They added that the P299 Workgroup should have looked at a suitable means to resolve such situations particularly in light of future European requirements.

ELEXON explained that P299 was proposing changes to clarify what data the Transmission Company could request to support the operation of the National Electricity Transmission System (NETS) thought the delivery of DSBR. The wider requirements and impacts of the DSBR service are outside of what P299 was looking to do. The Transmission Company representative agreed that wider European requirements will have an impact on DSBR however the resolution of Supplier position at Gate Closure is a matter outside of P299. This view was supported by another Panel Member, who re-iterated that P299 was enabling the Transmission Company to get access to data, and that there are a lot of matters arising from the European Balancing Code and the Smarter Markets work that P299 cannot resolve. The Panel Member finally added that position at Gate Closure and pricing would be looked at via the outcomes of the Electricity Balancing Significant Code Review.

The Distribution System Operator representative commented that the cost of providing the data was an issue but the benefits of DSBR were more significant as it would help 'keep the lights on'. They commented that one approach to resolve the costs of the Supplier having to provide the data is that the Supplier charges the customer that has signed up to be a DSBR provided for the provision of the data. A Panel Member responded that the Supplier may not know that a customer has signed up to be a DSBR service provider, so may not be able to recoup the costs this way.

The Distribution System Operator representative expressed a concern that the views provided by the Workgroup in its recommendation to the Panel was trying to act as a barrier to the delivery of DSBR.

A Panel Member highlighted the aims of P299, which is to enable the Transmission Company access to metered consumption data to support DSBR. P299 itself was not putting in place DSBR, and the approval of new balancing services are subject to a different governance approach outside of the BSC and in accordance with requirements in the Transmission Licence. They also clarified that they were of the view that the BSC already allows for the Transmission Company to get access to data. They referred to BSC Section H paragraph 4.4.3 which allows access to information and data for the purpose of operating and planning the Transmission System, and Section H4.6.3, which allows Parties to use Party data. With these requirements in mind, P299 provides clarity over what data is needed and the process by which such data is provided.

The same Panel Member questioned the Workgroup's views against Applicable BSC Objective (c) as they did not believe there was an impact on competition around the Transmission Company getting access to data to support the operation of the Transmission System. The costs for HHDCs to provide that data would be covered by Suppliers. The cost to the Supplier for providing the data would then likely be covered by any spill price form being pushed Long at Gate Closure as any spill price in this event. They finally added that the Panel should not be discussing the wider merits of DSBR but whether the data provision method proposed by P299 was appropriate.

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Another Panel Member queried the cost impact on Suppliers and agents in providing the data. It was explained that the likely volume of data required would be influenced by the number of tenders submitted as part of the DSBK tender process. The Panel Member then asked whether the time and effort to provide the data would distract the agent from other work. Another Panel member commented that it would not be a case of work being prioritised but more effort and resource being needed to deal with all the requests, including DSBK data requests. A suggestion was made that the Transmission Company could provide an indication of the likely number of tenders and volumes of data requests, which could then be shared with relevant HHDCs so they have an idea of how much data they may need to provide and when. The Transmission Company representative agreed that they could look into doing this and advising HHDCs accordingly.

The same Panel Member asked a final question to the Transmission Company representative, as to whether there was a 'plan B' if P299 was rejected. The Transmission Company representative explained that further thinking would be needed in the event of a rejection on the appropriate way forward. However they would make use of existing provisions in the Code to get the data, which P299 aims to add clarity to by setting out a clear process.

Panel's initial views on the Applicable BSC Objectives

Having considered the Modification and the Workgroup's views on P299 the Panel initially unanimously recommends that P299 is approved.

The Panel expressed the following views against the Applicable BSC Objectives:

Applicable BSC Objective (b)

The Panel **unanimously** agreed that P299 **would** better facilitate Applicable BSC Objective (b) as P299 would provide the Transmission Company with the metered consumption data required to validate DSBK tender bids and make payments to DSBK providers. This would in turn ensure that Transmission Company can operate the NETS in an efficient and economic manner.

Applicable BSC Objective (c)

A **majority** of Panel members agreed that P299 was neutral against Applicable BSC Objective (c).

A **minority** of Panel Members agreed that P299 **would** better facilitate Applicable BSC Objective (c) as P299 would aid the delivery of DSBK which will provide benefits to demand management and the contest to provide service.

Applicable BSC Objective (d)

A **majority** of Panel members agreed that P299 was neutral against Applicable BSC Objective (d).

A **minority** of the Panel expressed a view that P299 would not better facilitate Applicable BSC Objective (d) due to concerns around ensuring Supplier and Agent Compliance.

However a Panel Member commented that the compliance issue on Suppliers and Supplier Agents was countered by the requirements in BSC Section H4.4.3 whereby the Transmission Company can access that data to support balancing arrangements and by not getting that data it would cause National Grid to be in breach of the Code and Transmission Licence to deliver the NETS in an efficient and economical way.

Views of the Distribution System Operator representative and Transmission Company representative on P299 and the Applicable BSC Objectives:

Even though the views do not contribute to the Panel's initial views on P299 the Transmission Company and Distribution System Operator representatives were also asked to give their views on P299 and the Applicable BSC Objectives.

Transmission Company representative views

The Transmission Company representative expressed the view that P299 would help add clarity around existing provisions covering the provision of data to the Transmission Company in support of operating the Transmission System. They expressed a view that the solution would make it as easier as possible for the data to be provided by setting out a clear process to follow. With respect to the Applicable BSC Objectives, they expressed a view that P299:

- may have a very marginal benefit against Applicable BSC Objective (a) as it would help compliance with the licence in the provision a delivery of balancing services;
- would definitely better facilitate Applicable BSC Applicable BSC Objective (b) as the data would aid the delivery of DSBK part of the operation of the NETS;
- has no impacts on P299 against Applicable BSC Objective (c). They felt that the Workgroup's comments around Suppliers being Long at Gate Closure were views about the DSBK service rather than P299 and the access to data;
- has no impact against Applicable BSC Objective (d) as the solution is making use of an existing source of data; and
- has no impact against Applicable BSC Objective (e) as P299 does not relate to any European Regulation matters.

Distribution System Operator representative views

The Distribution System Operator representative expressed the view that P299

- may have a very marginal benefit against Applicable BSC Objective (a) for the same reasons expressed by the Transmission Company representative;
- has a large benefit against Applicable BSC Applicable BSC Objective (b) as the data would aid the delivery of DSBK part of the operation of the NETS;
- has a benefit against Applicable BSC Objective (c), as P299 will support DSBK which is a tool to help balance supply and demand;
- has no impacts against Applicable BSC Objective (d) as the solution is making use of an existing source of data; and

- has no impacts against Applicable BSC Objective (e) as P299 does not relate to any European Regulation matters.

They added that DSBR will have a positive impact on the environment as it will help promote the reduction of CO₂ emissions.

Panel's views on draft legal text

The Panel unanimously agrees with the Workgroup's view that the proposed changes to the BSC in Attachment A and BSCP502 redlining in Attachment B deliver the intention of P299.

Panel's views on the proposed Implementation Date

The Panel unanimously agrees with the Implementation Date proposed by the Workgroup, as detailed in Section 5.

Report Phase Consultation Questions

Do you agree with the Panel's initial unanimous recommendation that P299 should be approved?

Do you agree with the Panel that the redlined changes to the BSC and BSCP502 deliver the intention of P299?

Do you agree with the Panel's recommended Implementation Date?

The Panel invites you to give your views using the response form in Attachment C

9 Recommendations

The BSC Panel initially recommends to the Authority:

- That P299 should be **approved**
- An Implementation Date for P299 of:
 - 10 Working Days after an Authority decision
- The draft BSC legal text for P299; and
- The draft redlined changes to BSCP502.

Appendix 1: Proposed Format of Data Submitted to the Transmission Company

P299 proposes that the data submitted by HHDCs, to support the DSB service, should be submitted to the Transmission Company in a format akin to data that is currently sent in the DTC flow D0036. BSC Section S Annex S-2 refers to this flow as the Suppliers' Metering System Metered Consumption report.

The data report submitted by HHDCs will contain data for those Metering Systems and Settlement Dates specified by the Transmission Company in its requests. For the avoidance of doubt the Transmission Company will only request data from HHDCs for Metering Systems and time periods relevant to them. Furthermore, when HHDCs send historic tender data it will send it for all Settlement Periods and for all days (including weekends and bank holidays) over a winter period (or the periods that they were the appointed HHDC).

The content and format of these reports will be based on the current D0036 DTC definition, as shown in the diagram below:

Group	Group Description	Range	Condition	L1	L2	L3	L4	L5	L6	L7	L8	Item Name
101	MPAN Cores	1-*		G								
					1							MPAN Core
					1							Measurement Quantity Id
					1							Supplier Id
102	Settlement Date	1-*		G								
						1						Settlement Date
103	HH Periods	8				G						
							1					Actual/Estimated Indicator
							1					Period Metered Consumption

The data report submitted by HHDCs to the Transmission Company is identical to the format and data contained in the D0036. This means that the relevant headers and footers, which would be sent with a D0036, will also be included in these reports.

In order to enable HHDCs to re-use the current report generation functions, the Group names (101,102 and 103 as listed above) are the same as those in the D0036.

Once generated, the HHDC will provide the data report to the Transmission Company as a pipe delimited text file attached to an email.

Appendix 2: Workgroup Details

Workgroup's Terms of Reference

Specific areas set by the BSC Panel in the P299 Terms of Reference

What data is required to support the DSBR service and what are the processes and associated timescales for collecting such data?

What are the potential impacts on BSC Parties and Party Agents due to the collection of this data?

What are the impacts on Suppliers, including how a DSBR event may impact their position at Gate Closure?

How will a Supplier be informed that the Transmission Company has instructed the use of DSBR for one or more of its sites?

What steps will be taken to ensure the data collected is securely held and the integrity of the data is intact?

What changes are required to BSC documents and how details do the change need to be?

What are the related costs and lead times associated with P299?

Are there any Alternative Modifications?

Does P299 facilitate the Applicable BSC Objectives better than the current baseline?

Assessment Procedure timetable

P299 Assessment Timetable

Event	Date
Present Initial Written Assessment to Panel	13 Feb 14
Workgroup Meeting 1	18 Feb 14
Industry Impact Assessment/Assessment Consultation	28 Feb – 14 Mar 14
Workgroup Meeting 2	19 March 2014
Present Assessment Report to Panel	10 Apr 14

Workgroup membership and attendance

P299 Workgroup Attendance			
Name	Organisation	18/02/14	19/03/14
Members			
David Barber	ELEXON (<i>Chair</i>)	✓	✓
Talia Addy	ELEXON (<i>Lead Analyst</i>)	✓	✓
Peter Bingham	P299 (<i>Proposer</i>)	✗	✗
Alex Haffner	P299 (<i>Proposer Representative</i>)	✓	✓
Gary Henderson	ScottishPower	✓	✓
Philip Russell	Independent	✓	✓
Ian Hall	IMServ	✓	✓
Jane Lucy	databarta	✓	✗
Richard Evans	Siemens	✓	✗
Nick Butlin	KiWi Power	✗	✗
Ben Fuller	British Gas	✓	✓
Attendees			
Steve Francis	ELEXON (<i>Design Authority</i>)	✓	✗
Alex Burford	ELEXON (<i>Legal</i>)	✓	✗
Tina Wirth	ELEXON (<i>Legal</i>)	✓	✗
Sat Sahota	E.ON	✗	✓

Appendix 3: Glossary & References

The terms used in this document are defined in the table below:

Glossary of Defined Terms	
Acronym	Defined Term
BMRS	Balancing Mechanism Reporting System
BM Unit	Balancing Mechanism Unit
BSCP	Balancing and Settlement Code Procedure
CUSC	Connection and Use of System Code
DSBR	Demand Side Balancing Reserve
DTC	Data Transfer Catalogue
DTN	Data Transfer Network
DTS	Data Transfer Service
EMR	Electricity Market Reform
HH	Half Hourly
HHDA	Half Hourly Data Aggregator
HHDC	Half Hourly Data Collector
LDSO	License Distribution System Operator
MPAN	Metering Point Administration Number
MSID	Metering System Identification Number
MW	Megawatt
NETS	National Electricity Transmission System
SLC	Standard Licence Condition
SMMC _{Zakj}	Metering System Metered Consumption
SSP	System Sell Price
STOR	Short Term Operating Reserve
SVA	Supplier Volume Allocation
SVAA	Supplier Volume Allocation Agent
WD	Working Day

DTC Items & Flows	
Number	Name
D0036	Validated Half Hourly Advances for Inclusion in Aggregated Supplier Matrix

All URL links listed in the table below are correct as of the date of this document

Helpful Links		
Page	URL	Description
n/a	http://www.elexon.co.uk/mod-proposal/p299/	P299 Page of ELEXON Website
4	https://www.ofgem.gov.uk/licences-codes-and-standards/licences/licence-conditions	Electricity Transmission License Conditions
4	http://www.nationalgrid.com/NR/rdonlyres/3F8C2A41-F3D7-4847-9CC2-1788F4ADD16D/63265/DSBRReportFinal181113.pdf	Supporting Report to the Authority on DSBR
4	https://www.ofgem.gov.uk/publications-and-updates/national-grid%E2%80%99s-proposed-new-balancing-services-decision-letter	Authority decision letter on DSBR
5	http://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/	Link to BSC Section L
12	http://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/4/?show=10&type=class	Link to BSCP502
15	http://www.iso.org/iso/home/standards/management-standards/iso27001.htm	ISO 27001 - Information Security Management
16	http://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/	Link to BSC Section H
21	http://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/7/?show=10&type=class	Link to BSCP550