

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

P329 'Changes to REMIT inside information reporting'

P329 proposes to align the BSC and Balancing Mechanism Reporting Service (BMRS) with the Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT) common schemas for inside information web feeds, required by the Agency for the Cooperation of Energy Regulators (ACER)

To achieve this, the REMIT inside information data submitted by participants and reported by the BMRS will need to cover the output requirements of ACER

In addition to the ACER requirements, P329 would enable the submission of outage profile information to BMRS

This Report Phase Consultation for P329 closes:

5pm on Friday 26 February 2016

The Panel may not be able to consider late responses.



The BSC Panel initially recommends **approval** of the P329 Alternative Modification and **rejection** of the P329 Proposed Modification

This Modification is expected to impact:

- The Balancing Mechanism Reporting Agent (BMRA)
- The Transmission Company
- BSC Parties
- ELEXON

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About This Document

This is the P329 Draft Modification Report, which ELEXON is issuing for industry consultation on the BSC Panel's behalf. It contains the Panel's provisional recommendations on P329. The Panel will consider all consultation responses at its meeting on 10 March 2016, when it will agree a final recommendation to the Authority on whether or not the change should be made.

There are six 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 Requirements for P329
- Attachment B contains the draft redlined changes to the BSC for P329 Proposed Modification.
- Attachment C contains the draft redlined changes to the BSC for P329 Alternative Modification.
- Attachment D contains the full (public) responses received to the Workgroup's Assessment Procedure Consultation.
- 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/comments you wish the Panel to consider.



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P329
Report Phase Consultation

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Why Change?

The Agency for the Co-operation of Energy Regulators (ACER) has set out its expectation for standardised web feeds within its Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT) [Manual of Procedures on data reporting v3.0](#) along with the Extensible Markup Language (XML) Schema Definitions (XSDs) for the collection of REMIT inside information data from REMIT platforms. As the [Balancing Mechanism Reporting Service \(BMRS\)](#) is the national reporting platform for electricity, ACER will expect the BMRS to expose a web feed which complies with the Manual of Procedures for collection of data by ACER.

Solution

Proposed Modification

The Proposed Modification would align BMRS with the REMIT common schemas for inside information web feeds, required by the ACER.

To achieve this, the REMIT inside information data submitted by participants will be required to match the output requirements¹ of ACER in accordance with the XSDs. This data will also be published as received from market participants on BMRS.

BSC Parties will be ultimately responsible for both accuracy and timeliness of their REMIT messages, as at present.

Participants will be able to submit outage profile information for reporting.

Information can presently be submitted via the [Market Operation Data Interface System \(MODIS\)](#) or directly via the ELEXON portal. Under the Proposed Modification the obligation on the Transmission Company to send data will be removed, and MODIS will therefore be removed as a route for REMIT submissions².

Alternative Modification

The Alternative Modification is the same as the Proposed except that the obligation on the Transmission Company to submit data would remain, and MODIS would therefore be retained as a route for REMIT submissions.

Impacts & Costs

P329 is expected to impact all BSC Parties and the Transmission Company; the Balancing Mechanism Reporting Agent (BMRA), which operates the BMRS; and ELEXON to implement the change.

The central systems implementation costs are approximately £72k. However, as the Service Provider that will deliver the solution is changing, a further assessment will be needed. This will be done under the implementation stage.

¹ For the data to be collected via the ATOM web feeds discussed in Section 6 **Error! eference source not found.**

² Note this has no impact on the submission of data under Transparency Regulation (543/2013)

Implementation

The Panel's initial unanimous view is that:

- if approved, P329 Proposed should be implemented on 23 February 2017 as part of the February 2017 BSC Systems Release and
- if approved, P329 Alternative should be implemented on 29 June 2017 as part of the June 2017 BSC Systems Release.

Recommendation

The Panel's initial unanimous view is that both the P329 Proposed and Alternative **better** facilitate Applicable BSC Objectives (b), (c), (d) and (e) compared with the existing baseline.

It was the Panel's unanimous view that the Alternative was better against (d), as there is less change required by, and fewer impacts on, Participants by retaining MODIS. Therefore it recommends that P329 Alternative should be **approved**.

2 Why Change?

Background

REMIT

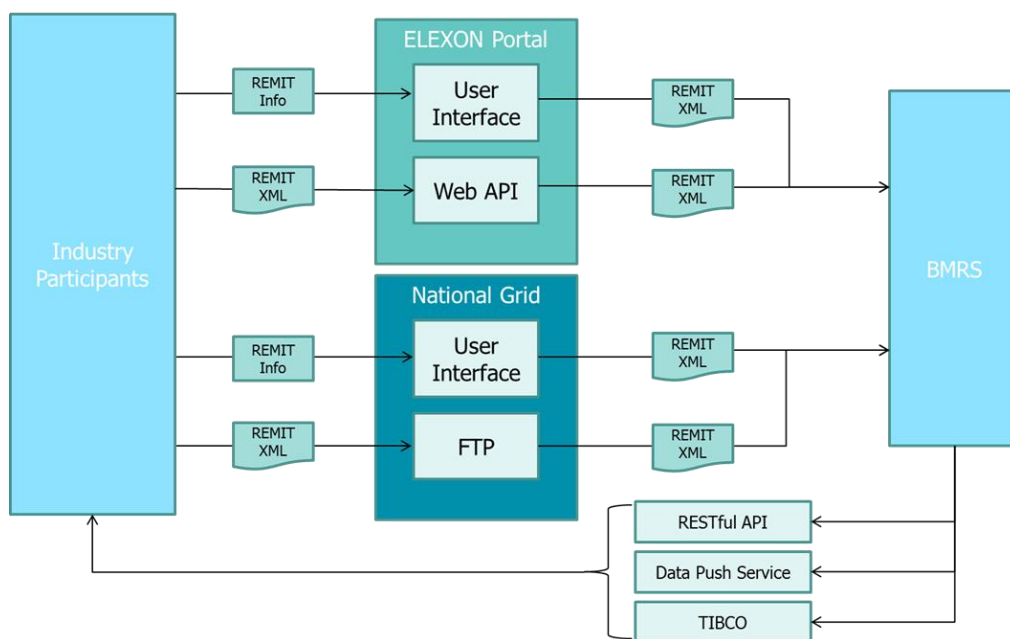
The European Union (EU) REMIT ([Regulation \(EU\) 1227/2011](#)) came into force in December 2011. It is aimed at preventing market abuse in the wholesale energy markets.

The guidance on REMIT from the ACER expressed a preference for this information to be published on central reporting platforms.

P291

SSE Energy Supply Ltd raised [P291 'REMIT Inside Information Reporting Platform for GB Electricity'](#) on 30 January 2013. P291 was approved by the Authority on 16 August 2013 and implemented on 31 December 2014. This made the BMRS the common platform for publishing inside information on the electricity market in Great Britain (GB).

In summary, participants can currently submit their REMIT Data via the ELEXON Portal or NGET's MODIS. A diagrammatic representation of the current REMIT interfaces is shown below.



REMIT Implementing Regulation

The EU REMIT Implementing Regulation ([Regulation \(EU\) 1348/2014](#)) came into force in December 2014. It specifies the reporting of fundamental data and data relevant to the REMIT. The relevance to the BSC and the BMRS is specifically Article 10 (1), which states:

“Market participants disclosing inside information on their website or service providers disclosing such information on market participants’ behalf shall provide web feeds to enable the Agency to collect these data efficiently”.

What is the issue?

ACER has set out its expectation for standardised web feeds within its REMIT Manual of Procedures on data reporting v3.0 along with the XSDs for the data. This was published on 30 September 2015. ACER states:

‘The Agency will start systematically collecting inside information through web feeds on the basis of the standards and electronic formats described in this Manual as of 7 April 2016 and would expect market participants disclosing inside information and service providers disclosing such information on market participants’ behalf to report the information through web feeds in the standards and electronic formats described in this Manual by 7 July 2016’.

ACER expects BMRS as the national reporting platform for electricity to expose a web feed that complies with the Manual of Procedures to allow it to collect data.

Proposed solution

P329 Proposed Modification proposes to align the BSC and BMRS with the inside information XSDs and allow the data to be collected via web feeds. The XSDs and standards for web feeds is defined and published by ACER in the REMIT Manual of Procedures on data reporting v3.0.

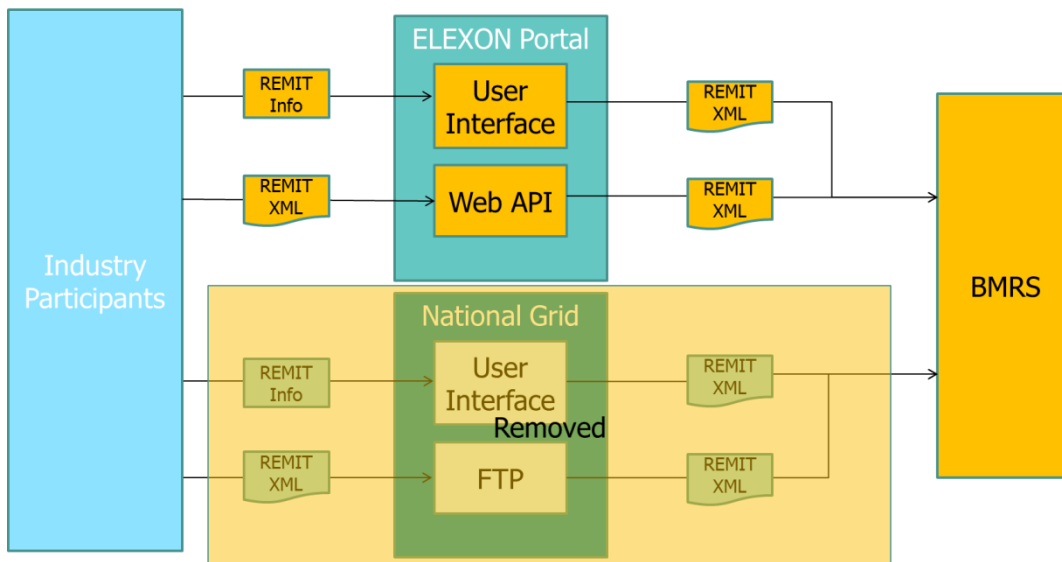
To achieve this, the REMIT inside information data submitted by participants will be required to match the output requirements of ACER in accordance with the XSDs. This data will also be published as received from market participants on BMRS.

BSC Parties will be ultimately responsible for both accuracy and timeliness of their REMIT messages, as at present.

There will also be an option for participants to submit an outage profile to BMRS, which is not part of ACER's requirements. Participants will be able to choose whether to use the option. ACER will still receive the information it has specified in the format set out in its XSD.

To enable the standardisation of the route of submission in to BMRS, MODIS will be removed as a route for submitting REMIT information. This would make the ELEXON Portal the sole method of submission for REMIT inside information³.

A diagrammatic representation of the Proposed REMIT data flow in interfaces is shown below. A diagrammatic representation of the BMRS changes and data flow out interfaces is also shown below under the Alternative Solution as this is common to both the Proposed and Alternative Modifications.



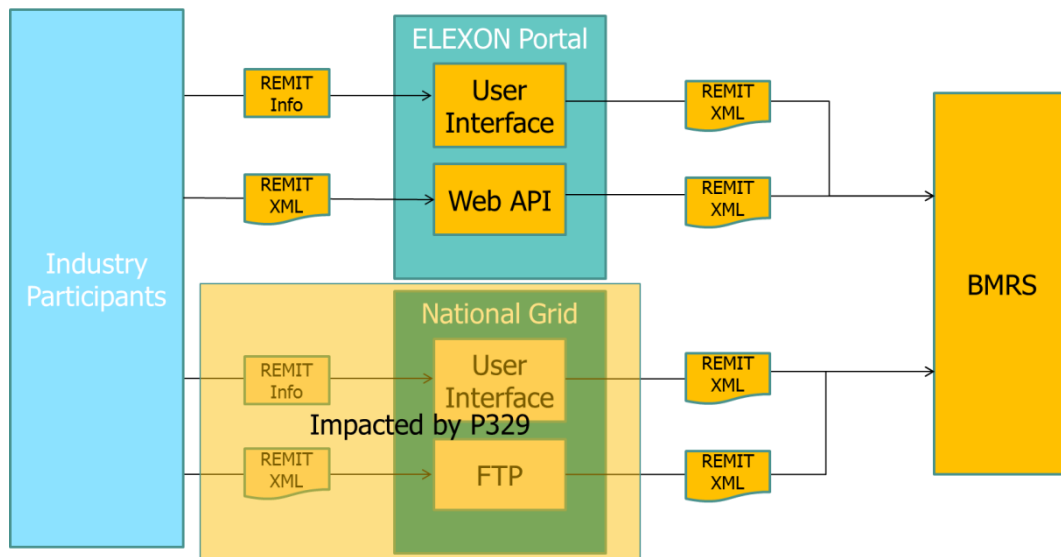
The requirements for the Proposed Modification solution are set out in Attachment A.

³ This does not impact EU Transparency Regulation.

Alternative solution

The Workgroup has developed an Alternative Modification, which is identical to the Proposed Modification except that MODIS will remain an option for Participants to submit REMIT information in to BMRS.

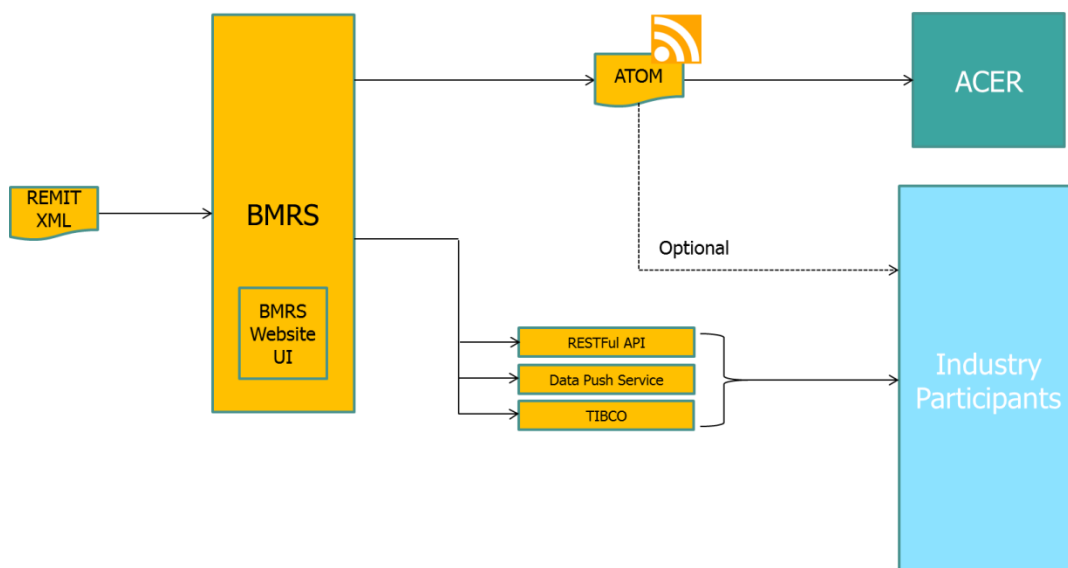
A diagrammatic representation of the Alternative REMIT data flow in interfaces is shown below.



The requirements for the Alternative Modification solution are set out in Attachment A.

BMRS changes and data flow out interfaces

A diagrammatic representation of the BMRS changes and data flow out interfaces is shown below. This is common to both the Proposed and Alternative Modifications.



Legal text

Both P329 solutions require changes to BSC Sections:

- Q 'Balancing Mechanism Activities'
- V 'Reporting'
- X Annex X-1 'General Glossary'.

Drafting approach

The draft changes to the BSC for both the Proposed and Alternative Modifications are set out in Attachment B and C, respectively. The approach to drafting the legal text for P329 is to remove much of the detail of the obligations from the BSC, while making the changes necessary to deliver P329.

The obligations will instead sit in the relevant Code Subsidiary Documents (CSDs). It is intended that this will allow the requirements to be specified more clearly and enable future changes to be made in a more straightforward manner, if necessary.

Hence the draft legal text (on the submission of Inside Information Data to the BMRA via the BSC Website) is linked to Section O2.2.1(a), as this clause provides the link to the Data File Catalogue, which includes the Central Volume Allocation (CVA) Data Catalogue. The CVA Data Catalogue specifies the REMIT data flows at present, and these are captured in detail in the NETA Interface Definition and Design (IDD). Following implementation of P329 the CVA Data Catalogue and IDD would continue to specify these flows, but without the duplication currently contained in Section Q.

As Sections V and X Annex X-1 point to Q11.2.3 for the meaning of Inside Information and the Proposed and Alternative Modifications remove Q.11.2.3 (and place the detail in the lower level documents) changes have been made to capture the meaning elsewhere.

Both the Proposed and Alternative Modifications make amendments to the same clauses in Sections Q, V and X Annex X-1.

The changes to the CSDs will be drafted as part of implementation of P329, if approved, as is usually done for Modifications. The CSD changes will reflect the P329 solution as set out in the final Modification documentation (i.e. including the agreed requirements) and any obligations removed from the BSC (subject to amendment to deliver the P329 solution).

The process of producing the CSDs will include industry consultation, and input will be sought from the P329 Workgroup and any other interested parties. The systems and documentation that will be impacted are summarised below.

Other changes

In addition to the legal text changes to the BSC, there will need to be changes to:

- the BMRS system
- Balancing Mechanism Reporting Agent (BMRA) Service Description
- BMRA User Requirements Specification (URS) and

- NETA IDD Part 1.

Changes to these will be developed through the implementation of P329, should it be approved, as described above. Both the Proposed and Alternative Modifications have the same impacts listed above.

Solution Requirements

ACER published its REMIT Manual of Procedures on data reporting v3.0 along with the XSDs for the data on 30 September 2015. ELEXON captured requirements based on ACERs specification. The Workgroup has reviewed and agreed the Requirements to deliver P329 (Attachment A).

Estimated central implementation costs of P329

The total central implementation costs for P329 are approximately **£72k** to make the necessary changes to the BMRS. However, as the Service Provider that will deliver the solution is changing, a further assessment will be needed. This will be done under the implementation stage.

Indicative industry costs of P329

It is difficult to indicate implementation costs for BSC Parties due to the lack of responses to the consultation that shared this information. Nonetheless, it is the Workgroup's view based on the responses that the costs will be greater for the Proposed Modification, for those that use MODIS for submitting REMIT information in to BMRS, than the Alternative Modification. Those that currently choose not to use BMRS for REMIT reporting will not be impacted by P329.

Transmission Company costs

The TC estimates that the cost to implement the changes for the Proposed Modification will be in the range of £100k to £200k, with no decrease in the operating cost of MODIS (due to its other uses).

For the Alternative Modification this is likely to cost in the range of £600k to £1.1m. The increase in cost compared with the Proposed Modification is due to the need to update MODIS, but there would be no increase in the ongoing operating cost for NGET of MODIS once implementation is complete.

P329 impacts

Impact on BSC Parties and Party Agents	
Party/Party Agent	Potential Impact
BSC Parties	<p>BSC Parties that intend to use BMRS to report REMIT information will need to make changes to their REMIT systems that interface with BMRS to report in line with ACER's common schemas and to provide the outage profile reporting. BSC Parties will be ultimately responsible for both accuracy and timeliness of their REMIT messages.</p> <p>For the Proposed Modification, BSC Parties that currently use MODIS to submit REMIT information in to BMRS, and intend to continue to report this information on BMRS, will need to switch to the ELEXON Portal as the sole method of submission. This would mean additional system changes and associated costs for those BSC Parties when compared with the Alternative Modification, which keeps the option of using MODIS.</p> <p>BSC Parties that choose not to use BMRS to report REMIT information will not be impacted by P329. However, most BSC Parties, and some non-BSC Parties, are impacted by the Regulation and will therefore likely need to implement the common schemas and provide a web feed to allow collection of data by ACER from its 'Start Date' of 7 July 2016.</p> <p>From 7 July 2016, any BSC Party that wishes to continue to use BMRS for reporting REMIT information will need to submit data under the current BMRS requirements, established under P291, until P329 is implemented. This could mean that they will need to have two reporting mechanisms, one for BMRS under current requirements and one for reporting to ACER to ensure compliance with the Regulation. BMRS will not be ready to accept the new format until go live in February 2017</p>

Report Phase Consultation Questions

Will P329 impact your organisation?

If 'Yes', please provide a description of the impact(s) on your organisation and any activities which you will need to undertake between the approval of P329 and the P329 Implementation Date (including any necessary changes to your systems, documents and processes). Where applicable, please state which of the roles that you operate as will be impacted and any differences in the impacts between each role.

Will your organisation incur any costs in implementing P329?

If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs.

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

Impact on Transmission Company

Proposed Modification

MODIS changes

- Disable P291 REMIT message data flow from MODIS (New)
- Decommissioning of REMIT functionality from MODIS (New)
- Changes to service support for REMIT functionality in MODIS (New)
- Assessment of hardware and software impact, along with changes in system and service documents (New).

Business changes

- Associated business process changes
- Notification to market participants.

Alternative Modification

MODIS changes

- P291 REMIT message data-flow will be impacted based on new XSD (Amend)
- MODIS REMIT system functionality in all environments, including those in production and non-production (Amend)
- MODIS online web-form User Interface (UI) for REMIT (Amend)
- MODIS web-service (Portal Upload) functionality, including system interfaces (Amend)
- XSD validation and creation of XML (Amend)
- FTP content from MODIS to ELEXON BMRS (Amend)
- Acknowledgement to market participants (Amend)
- Acknowledgement validation from ELEXON BMRS (Amend)
- Unit testing, System testing and Integration testing (New)
- Security compliance assessment (New)
- Multiple outage profiling will have impacts associated to those mentioned above and will be based on ELEXON's new XSD/schema (Amend).

Business changes

- Associated business process changes
- Notification to market participants.

Impact on BSCCo

Area of ELEXON	Potential Impact
Release Management	ELEXON will be required to implement this Modification.

Impact on BSC Systems and processes

BSC System/Process	Potential Impact
BMRA/BMRS	The BMRS will be updated to align with the new requirements (see Attachment A).
TIBCO Software ⁴	

Impact on Code

Code Section	Potential Impact
Section Q	Changes will be required to implement the solution.
Section V	
Section X Annex X-1	

Impact on Code Subsidiary Documents

CSD	Potential Impact
BMRA Service Description	Changes will be required to implement the solution.
BMRA URS	
NETA IDD Part 1	

Other Impacts

Item impacted	Potential Impact
European Transparency Regulation (ETR) – National Grid (NG)-Market Interface Specification	This is likely to be impacted.
Grid Code	No consequential changes have been identified at this stage.
System Operator - Transmission Owner Code (STC)	

⁴ The TIBCO software provides the mechanism for automated publication of BMRA data to participants.

Implementation approach

On 30 September ACER published and confirmed the new requirements and announced a start date for the new reporting requirements of 7 July 2016. ELEXON had previously advised ACER that we would need approximately 18 months from the requirements first being known to implement the changes needed to deliver the new reporting. This is due to the time needed to progress a Modification and make the changes to the BSC and BSC Systems.

ELEXON is in the process of rolling out Phase 3 of the new BMRS, which is planned for implementation on 15 March 2016. In addition, ELEXON is in the process of transitioning to a new service provider in the summer 2016. These, along with other changes to BMRS in the November 2016 Release, mean that it is not feasible to implement P329 until 23 February 2017 as part of the February 2017 BSC Systems Release. We have advised both ACER and Ofgem of this. ACER has not raised a concern. Ofgem has not objected but raised the points noted in the Workgroup's discussions (i.e. around the possible implications on Parties that may not submit direct to ACER while BMRS is not reporting having to be considered on a case by case basis, etc).

The Workgroup discussed the implementation of P329 being later than the 7 July 2016 start date (see Section 6).

Recommended Implementation Date

The Panel's initial unanimous view is for an Implementation Date for the P329 Proposed of **23 February 2017** as part of the February 2017 BSC Systems Release and that the P329 Alternative of **29 June 2017** as part of the June 2017 BSC Release. This is the earliest feasible Release for implementation by ELEXON, for the Proposed; and by NGET, for the Alternative.

REMIT Reporting Solution Requirements

The Workgroup has agreed the solution requirements in Attachment A. Both Proposed and Alternative Modification solutions include the option for participants to report on outage profiles. Under the Proposed Modification the Proposer has decided to remove MODIS as a conduit for submitting REMIT information in to BMRS; the Workgroup has retained MODIS submission in its Alternative Modification. The solution requirements in Attachment A cover both the Proposed and Alternative Modifications (which are the same except for the MODIS submission element), and indicate where requirements apply to only one of the P329 solutions.

Granularity of submissions

ACER's REMIT Manual of Procedures on data reporting v3.0 specifies that the REMIT inside information to be collected by a web feed should include an event (e.g. an outage) and its duration. The Manual allows the duration of an event to be reported to a low level resolution e.g. by minute.

A Workgroup member observed the granularity of submissions could be one minute, but that BMRS doesn't specify the granularity and that Half Hourly resolution is acceptable. ELEXON noted that there is no concept of time series or sequential blocks in ACER's requirements (unlike the concept of time series for submission of Transparency Regulation data)⁵. A Workgroup member's view was that if the Maximum Export Limit (MEL) changed for a plant, then they would expect that the Party would want to reflect this in its outage profile and therefore mirrored in the REMIT submission.

Submission to ACER: direct from participants and via BMRS

It was noted that for participants, there are two routes to providing the information to ACER: either via the participant's own REMIT platform or via BMRS as the national platform for electricity. Whilst using BMRS is optional, the benefit of having the national platform and also publishing on one's own website is to mitigate for situations when either one is not available. The intent is that what is received by BMRS is then made available for collection by ACER.

Web feeds to ACER and to industry participants

ACER has specified that the web feed it receives should be either Rich Site Summary (RSS) or ATOM. Of these two ELEXON prefers the use of ATOM, because it is more standardised. ELEXON's preferred mechanism is to use RESTful Application Programming Interface (API) web feed. However, this was not an option included by ACER.

It was clarified that the decision between the ATOM and RSS options applied only to how ACER received the information. However, the Workgroup agreed that the ACER web feed should also be made available to participants (i.e. in addition to the RESTful API web feed currently provided to participants and which would be maintained under P329) in order to provide transparency and flexibility.

⁵ Time series is a paradigm relevant to the submission of European Transparency data under Regulation 543/2013

A Workgroup member noted that their organisation uses RSS as from their experience ATOM has been known to be impacted by Microsoft® products, such as Outlook™. The same organisation also expressed this view during its response to the P329 consultation. However, following the consultation the Workgroup member later confirmed that the use of an ATOM feed would no longer be an issue for them as they have recently upgraded their Microsoft suite.

Noting that there were no objections to using ATOM, ELEXON advised that BMRS will:

- continue to provide REST API web feed for participants; and
- provide ATOM web feed to ACER and participants.

The Workgroup considered that there may be BMRS performance issues as a result of exposing the ACER required web feed to make it available to participants, with organisations potentially polling data every minute or more. However, the Workgroup noted that BMRS will need to have controls in place to address this issue by restricting how frequently data can be retrieved.

No manipulation of data by BMRS

A Workgroup member noted that there are not many differences between the data currently reported for REMIT and that which would be reported under the new requirements. They suggested that rather than participants having to make changes it could be more efficient for the BMRS to be amended so that data that it currently receives is processed to meet ACER's requirements. The member believed that a solution of this kind could potentially be implemented in time for ACER's 7 July 2016 start date.

However, the Workgroup noted that there are unacceptable risks associated with this approach. For instance, ACER's XSD is based on ENTSO-e's fuel type, which currently uses 20 fuel types; whereas the current REMIT XSD uses 13. Therefore, BMRS could not easily report the information or errors could occur in the reporting.

ELEXON advised that it did not believe it could accept liability for potential reporting errors, and noted that the scope of P329 was set to preclude this option. The Workgroup agreed that this solution could not be explored under P329, but noted that a BSC Party could raise a separate Modification to explore it, though there would still be BSC system implementation constraints as per P329 and work would need to be done to determine the manipulation of existing data that would be required (and this would still leave the question of liability for possible errors introduced by such manipulation).

ACER use of asset IDs

The Workgroup noted that BMRS uses of Balancing Mechanism (BM) Unit IDs in its reporting, as opposed to asset IDs used by ACER, but that ELEXON would address this as part of the implementation of the solution.

Reporting on outage profiles

The Workgroup had considered a member's view that Parties would wish to reflect changes in plants' MEL in their outage profiles in the interest of transparency.

The Workgroup noted that RWE has raised [Issue 63 'Improved reporting of event history and profile availability during outage events on the BMRS REMIT pages'](#). This Issue was raised to look at the REMIT information that is submitted and published on the BMRS where a reported outage consists of multiple availability levels during the course of the event. The Issue 63 Proposer believes that the current method of reporting a single minimum availability for the entire outage period doesn't give a complete representation of changes in availability during the event.

One Workgroup member noted that P329 is aimed at addressing the explicit regulatory requirement, whereas Issue 63 seeks to explore additional efficiencies and improvements in BMRS reporting. Overall the Workgroup agreed that it would be sensible to explore this area as part of P329, while remaining mindful of the terms of reference for the Modification and its agreed progression timetable.

The Workgroup consulted upon possible outage profile submission as part of P329 and, following consultation, the Workgroup included the additional requirement to enable participants to articulate availability changes of a particular event in one XML submission. This requirement to submit this level of detail is optional for participants.

The Workgroup believes that to deliver this additional requirement the XSDs would be amended, providing a hierarchy structure for the XSDs. This would mean that the submissions into BMRS (that may include this information) would be published as a main event with the profile. The main event will be displayed on the website with the lower level data (profiles for the outages) sitting underneath it (i.e. a parent and child relationship).

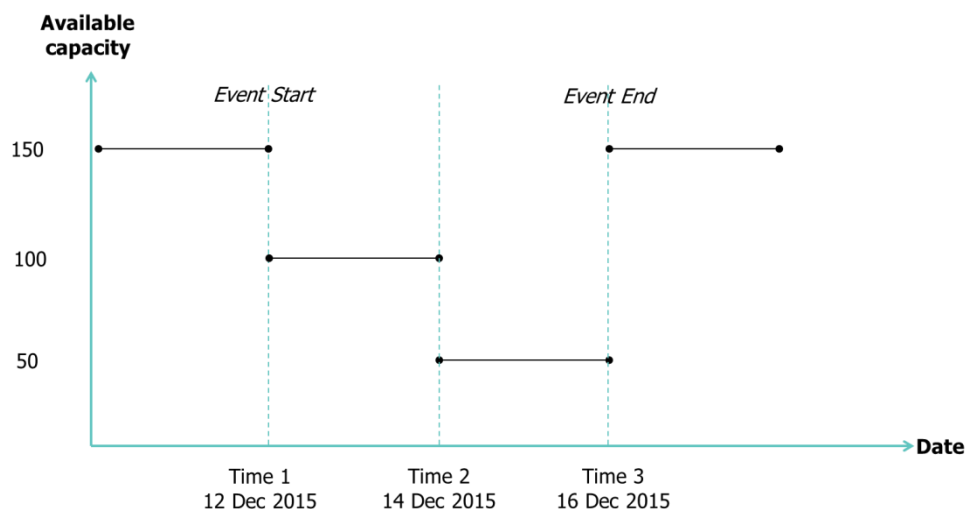
The information that will be available for collection by ACER via ATOM will be as specified in the Manual of Procedure (i.e. without profiles).

Ofgem agreed that this was the best approach and that ACER may wish to request profile details at a later stage.

To implement this option, XSDs will need to be produced that are based on ACER's XSDs will but modified to include a lower level of detail to allow participants to articulate the profile of their outages, should they choose to use this function. For the avoidance of doubt, the information collected by ACER will be exactly as specified in the REMIT Manual of Procedures on data reporting v3.0.

Note, the BMRS will still provide profile for outages via the RESTful API and the data push service, which is fully available to all including ACER should it wish to obtain the information.

Outage Profile Example



The event in the graph above has multiple capacity changes and the ACER's XSD does not allow the profile to be articulated (only one value for the availability for an outage event). Therefore using a 'flat' structure could require include two separate submissions/events to describe the event fully. This is illustrated below.

Example of submissions without profile			
Event Start	Event End	Available Capacity	Installed capacity
Time 1	Time 2	100	150
Time 2	Time 3	50	150

Allowing a profile within a submission will include only one event with the event start (Time 1) and event end (Time 3). The profile will be articulated within the outage to show the change in capacity at Time 2. The difference in this example is not significant, but National Grid noted that some participants make many individual submissions to describe complex events; enabling the submission of event profiles would allow this to be captured in a single submission. Using this approach only a material capacity change (under REMIT) will be articulated. Participants will determine whether the capacity is material based on the REMIT regulation. The Workgroup believed that this approach would help with:

- better transparency with the disclosure of inside information
- improve system performance by significantly reduce the number of submissions for long outages and
- reduce confusion with the brevity of information.

A Workgroup member who was also the Proposer's Representative with regard to Issue 63 confirmed that Issue 63 did not need to be progressed further due to the inclusion of the option to report on outage profiles under P329.

Amalgamation of ACER's XSDs

Of relevance to BMRS, there are two XSD data types for reporting REMIT inside information: 'unavailability of electricity' and 'other'. The Workgroup noted that ELEXON intends to amalgamate the two into one XSD that will be used for participant submissions in to BMRS, with an identifier to distinguish between the two types of submission. This means that ELEXON only needs to develop and maintain one flow, which reduces the implementation costs and has less impact on participants. The Workgroup were supportive of this approach.

Allowing a greater number of revisions to submissions

The current solution developed under P291 allows participants to make revisions to the data submitted to BMRS. Currently, the BMRS allows 999 revisions to be carried out. A Workgroup member suggested that this criterion could be relaxed to enable a higher number of revisions. This is particularly used for site undergoing commissioning. The Workgroup agreed with this suggestion. ELEXON noted that this would only be used in exceptional circumstances but agreed to capture in the requirements.

Removal of MODIS as route for submitting REMIT information

The Workgroup noted that ELEXON and NGET have discussed the potential to align BMRS and MODIS, which may include the use of the same Graphical User Interfaces (GUI). An NGET attendee suggested that making the ELEXON Portal the sole interface for all REMIT communications into BMRS would create consistency and reduce complexity. However, they recognised that this would impact on those that do not currently use the ELEXON Portal directly and make REMIT submissions using MODIS only.

It should be noted that if MODIS was removed as a REMIT submission route this would not affect any of its other function, which would be retained and would not be negatively impacted.

The Workgroup noted that at present there is no manual upload function for the ELEXON Portal, but agreed to explore this through the Assessment Procedure consultation (responses to which are highlighted below).

The removal of MODIS as a route for submitting REMIT information was set out as 'Option 2' in the Assessment Procedure Consultation.

Proposed Modification: includes removing MODIS as a method for submitting REMIT information in to BMRS

Ultimately, NGET as the Proposer adopted the option of removing MODIS as a method for submitting REMIT information in to BMRS. It noted that MODIS is used to support submission and publication of De-rated Margin (DRM) data, Loss of Load Probability (LoLP) data and Demand Control notifications under [P305 'Electricity Balancing Significant Code Review Developments'](#) as well as REMIT and ETR reporting from market participants (P291 and [P295 'Submission and publication of Transparency regulation data via the BMRS'](#) respectively). For the avoidance of doubt, if MODIS is removed as a REMIT submission route these other functions would still be retained in full.

NGET advised that a significant programme of work is currently being undertaken on MODIS. This is in order to ensure that MODIS remains capable of performing its important wider market functions to a high degree of quality assurance, and in order to introduce additional functionality. This is intended to deliver performance and resilience, to mitigate any risk of further issues similar to those experienced around the P305 implementation in the November 2015 Release. It believes that there is a very real risk that the introduction of the P329 MODIS changes over the same period may jeopardise the delivery of this programme, the P329 implementation or both.

NGET also noted that there are potential future benefits of removing MODIS as a method for submitting REMIT information. It believes that it negates any threat of further REMIT format changes being imposed by ACER around the time of the second phase of P305 delivery (2018/19).

It therefore saw P329 as an opportunity for market participants that use MODIS for REMIT submissions to make changes to their method of submitting REMIT information, as they would be opening up those systems anyway.

For these reasons, the Proposer adopted Option 2 (i.e. removal of MODIS as a submission route for REMIT Inside Information reporting).

Alternative Modification: retains MODIS as a method for submitting REMIT information in to BMRS

The Workgroup noted the system impacts and costs (including previous costs of implementing the MODIS option) on market participants who currently utilise the MODIS method. As such, the Workgroup believed that retaining the MODIS method would be better than the Proposed Modification. It therefore developed an Alternative Modification, which is identical to the Proposed Modification with the exception that it retains MODIS as a method for submitting REMIT information in to BMRS.

Does implementation later than 7 July 2016 have any effect?

The Workgroup noted that ELEXON and National Grid would not be able to implement P329 by 7 July 2015 and that the Panel had asked it to consider the consequences of this on participants. The Workgroup considered that participants are aiming to meet the 7 July 2016 start date for their individual REMIT submissions to ACER. If participants can meet the 7 July 2016 date, but the central BMRS solution cannot be implemented until a later date, there would be a period (7 July 2016 to the P329 Implementation Date) when participants are submitting information that meets the new requirements to ACER directly and may submit information to the BMRS (directly or via MODIS). If the information submitted to the BMRS before P329 implementation meets the new ACER requirements it would be rejected, as the BMRS will not have been updated to be able to accept it. If the submitted information in to BMRS meets the existing criteria for acceptance it will be accepted by the BMRS but will not be provided to ACER (but would be published on the BMRS in the interests of transparency). However, ACER could obtain the existing information using the RESTful API web feed.

Legal view on the EU REMIT Implementing Regulation

ELEXON cannot advise market participants on how the EU REMIT Implementing Regulation applies to them, other than in respect to the impact these have on BMRS.

In regard to the Regulation's impact on BMRS, it is ELEXON's legal view that it is legally enforceable and that, as BMRS already provides a web feed, BMRS is compliant with Article 10 of the regulation. However, ELEXON cannot state with absolute certainty whether the REMIT Manual of Procedures on data reporting v3.0 is directly legally applicable, but its view is that the requirements imposed by the Manual of Procedures should be complied with to reduce the risk of any breach, either at present or in future. Therefore the BMRS must continue to provide a REMIT web feed; while it is desirable that this web feed be fully compliant with the new REMIT requirements as soon as possible, the current (P291 compliant) REMIT web feed must be maintained until the new web feed is delivered.

Ofgem comments

An Ofgem representative noted that Ofgem was sympathetic to ELEXON and NGET's implementation issues. They noted that ACER doesn't have the powers to enforce the regulations, but that this falls to Ofgem. They informed the Workgroup that Ofgem was not in a position to advise whether non-compliance would result in action by it. However, it agreed that if the regulation and Manual of Procedures were in the process of being implemented, then this would likely be taken in to consideration.

Option for participants to cease using BMRS until P329 is implemented

A Workgroup member suggested that consideration might be given to whether it would be more efficient to cease submitting information to BMRS until it could meet the new REMIT requirements. ELEXON noted that the use of BMRS for REMIT reporting was optional. It also noted that in its experience market participants currently use BMRS and their own websites to report REMIT information, as this provides contingency. It was unclear whether market participants would take the same considerations now that the REMIT requirements were being extended.

Use of BMRS for REMIT from 7 July 2016

ELEXON advised that if market participants were to submit REMIT information in to BMRS from 7 July 2016, then this must be in the existing XML format, otherwise it would be rejected. This therefore could mean that from 7 July 2016, participants implement ACER's XML requirements and retain the existing BMRS XML, which could be problematic for them. ELEXON noted that any submission of REMIT information in to BMRS under the existing XML will not be passed on to ACER, though ACER could obtain the existing information using the REST API.

Ofgem supported the approach of maintaining the current (P291) requirements on a practical level, as it would still provide useful information to the market. Ofgem would only consider supporting removal of the existing BMRS REMIT reporting if there was a benefit to the industry.

A Workgroup member enquired as to whether therefore there will need to be two XML schemas from July 2016. ELEXON suggested that this will be transitioned, with new pages

created. ELEXON will cease to support the previous requirements and support only the new REMIT XSD from the P329 Implementation Date. However, to standardise reporting of REMIT inside information there may be a need to archive the old pages at a later date. This will be considered as part of the implementation.

A Workgroup member noted the potential risks of confusion during any transition period as a result of two slightly different REMIT information feeds (MODIS and ELEXON Portal interfaces on the one hand and Market Participant web feeds on the other) from 7 July 2016 until the P329 Implementation Date, and possibly presentations of data, needing to co-exist.

Routine test environment

The Workgroup noted the usefulness of the test environments ELEXON provides during implementation and asked ELEXON to consider whether the BMRS test environment could become routine beyond the participant's testing during implementation. ELEXON noted that there could be additional, ongoing costs to provide this as well as contractual considerations. Nonetheless, it agreed to consider it, but noted that this matter was separate to the mandatory implementation requirements of P329. ELEXON are investigating this and will progress in parallel with P329.

Questions for ACER

ELEXON had made ACER aware of the time needed to implement this change in the BSC and related systems well before it published its Manual of Procedures. It has since proved difficult to engage with ACER since the publication of the Manual of Procedures and since P329 has been raised and during its Assessment. However, because ACER's Start Date is now considerably earlier than the Implementation Date, the Workgroup has asked that ELEXON seek ACER's views on the areas set out below, which were agreed by the Workgroup:

- the February 2017 Implementation Date, specifically in regard to receiving no information from BMRS between the 'Start Date' and the P329 Implementation Date
- the provision of information by individual participants between the 'Start Date' and the P329 Implementation Date
- how it would handle receiving potentially dual information (one directly from the Participant and one from BMRS as the national platform).

Responses on these points would not impact the solutions developed for P329; the proposer and Workgroup have developed the solutions with regard to the P329 proposal, P329 terms of reference and the ACER specification. However, responses could provide useful information for consideration by the Panel and industry participants during the P329 Report Phase. Clarification could also better inform participants with respect to the REMIT requirements on them individually (separate to P329).

At the time of finalising the Assessment Report, no response had been received from ACER.

Applicable BSC Objectives

The Workgroup's unanimous view is that both the P329 Proposed and Alternative **better** facilitate Applicable BSC Objectives **(b)**, **(c)**, **(d)** and **(e)** compared with the existing baseline. However, not all members agreed with all objectives.

However, it was the Workgroup's majority view that the Alternative was better against **(d)**, as there is less change required and fewer impacts on Participants by retaining MODIS. Therefore it recommends that P329 Alternative should be **approved**.

Applicable BSC Objective (e)

P291 could not be justified under **Applicable BSC Objective (e)**, as there was no legally binding requirement for the BSC to deliver the national electricity REMIT inside information platform. However, once the BSC became the means for delivering the national platform (that is, with approval of P291), any applicable regulations relating to REMIT are now relevant. As such there is a justification against **Objective (e)** so as to meet Article 10(1) of the EU REMIT Implementing Regulation.

If the BSC reporting platform for REMIT is not aligned with the requirements for central reporting to ACER then the platform is not fully delivering an inside information reporting platform for GB in manner required by ACER. This could undermine the use of the BSC platform as a central reporting platform for participants.

Applicable BSC Objectives (c), (d) and (b) in line with P291

Because this Modification would align the BSC reporting with the REMIT requirements, and therefore maintain an incentive for participants to use it as a central reporting platform, it would better facilitate **Applicable BSC Objectives (c)**, **(d)** and **(b)** for the same reasons as P291:

- **Objective (c)** - increased transparency may enable market participants to make more informed decisions, and the new platform could particularly benefit participants with fewer resources, which is likely to promote increased market participation and thus increase effective competition in the generation and supply of electricity as well as in its sale and purchase.
- **Objective (d)** - wide use of the platform may mean market participants are better informed and hence balance their positions more effectively, which may lead to more efficient balancing of the system by NGET.
- **Objective (b)** - if market participants are able to make more informed decisions to increased transparency, this in turn may result in the more efficient, economic and co-ordinated operation of the national electricity transmission system.

Applicable BSC Objective (d)

In addition, it would be more efficient to change the existing platform than to establish a different reporting platform to meet the latest REMIT requirements. Therefore this Modification is the most efficient way for the Authority to enforce the REMIT, and this



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]

(f) Implementing and administering the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation

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efficiency benefit may also represent an additional justification against **Applicable BSC Objective (d)** on the grounds that aligning the BMRS with ACER's requirements would promote efficiency in the implementation of the balancing and settlement arrangements.

The Workgroup believed both the Proposed and Alternative Modifications would have benefits against Objective (d), but its majority view was that the Alternative was better against **(d)** than the Proposed Modification, as there is less change required and fewer impacts on Participants by retaining MODIS. Therefore it recommends that P329 Alternative should be **approved**.

Does P329 better facilitate the Applicable BSC Objectives? ⁶		
Obj	Proposed Modification	Alternative Modification
(a)	<ul style="list-style-type: none"> Neutral (unanimous) – No impact 	<ul style="list-style-type: none"> Neutral (unanimous) – As per Proposed Modification
(b)	<ul style="list-style-type: none"> Yes (majority) – Participants will be able to make more informed decisions due to increased transparency Neutral (minority – one) – No impact 	<ul style="list-style-type: none"> Yes (unanimous) – As per Proposed Modification
(c)	<ul style="list-style-type: none"> Yes (unanimous) – increased transparency may enable participants to make informed decisions, and the new platform could particularly benefit participants with fewer resources 	<ul style="list-style-type: none"> Yes (unanimous) – As per Proposed Modification
(d)	<ul style="list-style-type: none"> Yes (majority) – wide use of the platform may mean participants are better informed and hence balance their positions more effectively No (minority – one) – due to the existing investment in MODIS by participants 	<ul style="list-style-type: none"> Yes (majority) – As per Proposed Modification Neutral (minority – one) – No impact No (minority – Proposer) – Due to the risks associated with MODIS
(e)	<ul style="list-style-type: none"> Yes (unanimous) – the BMRS is the means for delivering the national platform (P291), therefore any applicable regulations relating to REMIT are relevant 	<ul style="list-style-type: none"> Yes (unanimous) – As per Proposed Modification
(f)	<ul style="list-style-type: none"> Neutral – No impact 	<ul style="list-style-type: none"> Neutral (unanimous) – As per Proposed Modification

Participants' views against the Applicable BSC Objectives

Participants were in agreement with the Workgroup on the Applicable BSC Objectives, in particular with regard to (e).

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

Panel's initial views against the Applicable BSC Objectives

The Panel's initial unanimous view is that P329 would **better** facilitate Applicable BSC Objectives **(b), (c), (d)** and **(e)**. It was the Panel's unanimous view that the Alternative was better against **(d)**, as there is less change required by, and fewer impacts on, Participants by retaining MODIS.

The Panel therefore initially recommends that P329 Alternative be approved and P329 Proposed be rejected.

Implementation approach

Transmission Company implementation risk

The TC Representative notified the Panel that the TC could not implement P329 Alternative for the 23 February 2017 Implementation Date recommended by the Workgroup due to the significant risks that would be associated with implementation at this time. Implementation in February 2017 would mean that there would be no spare capacity or contingency for any other changes or any issues that might arise. The TC Representative advised that it could achieve implementation in the June 2017 BSC Release.

During the Assessment procedure, and the Workgroup's discussions, the TC had identified risks associated with February 2017 implementation of the Alternative, but the TC had now concluded that these risks were too significant for implementation of the Alternative Modification in February 2017 to be feasible. The TC has also clarified that the significant costs associated with the Alternative covered participant testing and support as well as changes to the MODIS system itself.

Panel view

The TC notification had no implication for the Proposed Modification. The Panel therefore unanimously agreed an initial recommended Implementation Date for the P329 Proposed Modification of 23 February 2017 as part of the February 2017 BSC Release (as recommended by the Workgroup).

Taking into account the TC's implementation constraints, the Panel unanimously agreed an initial recommended Implementation Date for the P329 Alternative Modification of **29 June 2017** as part of the June 2017 BSC Release. The Panel noted that the Workgroup had not had the opportunity to consider the final TC position on the P329 implementation risks and constraints in agreeing its recommended Implementation Date for the Alternative Modification, and views from industry participants as part of the Report Phase consultation would be welcome.

Confirmation of the TC's ability to implement the Alternative Modification on 29 June 2017 is anticipated as part of the Report Phase consultation.

Self-Governance considerations

When P329 was first progressed in to the Assessment Procedure, the Panel initially believed that P329 should be progressed as a Self-Governance Modification, as it had no material impact on the specified categories and did not discriminate between different classes of Parties.

However, the Workgroup's originally recommended Implementation Date for the P329 Alternative Modification of 23 February 2017 is not achievable for the TC (and the Workgroup was not able to fully consider this), and the Proposed and Alternative Modifications therefore differ in when they would be implemented (i.e. when the new ACER requirements would be met), as well as in the impacts they have upon participants that use MODIS for REMIT submissions.

It therefore now appears that P329 is not suitable for Self-Governance, and should proceed under the normal process, with the Authority making the final determination following the Panel's final recommendation. The Panel welcomes views on this as part of the Report Phase consultation.

Legal text changes

The Panel initially unanimously agreed that the draft legal text changes to BSC Section Q, V and Annex X-1 deliver the P329 solution. Full details of the proposed changes can be found in Attachments B and C.

Proposed Modification compared with Alternative Modification

As set out above, the Panel agreed an initial recommended Implementation Date for the Alternative Modification of 29 June 2017, instead of 23 February 2017 as recommended by the Workgroup without knowledge of the revised TC position on this date.

The Panel noted that the Workgroup had not had the opportunity to consider the final TC position on the P329 implementation risks and constraints. It acknowledged that the Workgroup's views would have been valuable, and that the information may have had an impact on the Workgroup's considerations, but was mindful that any delay to P329 at this stage would jeopardise the implementation, if approved, of the Proposed Modification in February 2017 or the Alternative Modification in June 2017.

The Panel also noted that the majority of the Assessment Procedure consultation respondents supported retaining MODIS, and that this was the Workgroup's preference (except the Proposer), albeit without knowledge of the impact of this on the implementation of the Alternative Modification.

Taking all this into consideration, the Panel agreed with the Workgroup's view that both the P329 Proposed and Alternative Modifications would better facilitate Applicable BSC Objectives (b), (c), (d) and (e) for the reasons set out by the Workgroup.

It was the Panel's unanimous view that the Alternative would better facilitate (d) compared with the Proposed, for the reason given by the Workgroup, that there is less change required by, and fewer impacts on, Participants by retaining MODIS. The Panel believed this to be the case even taking into account the later Implementation Date for the Alternative Modification, but welcomes views on this point.

Report Phase Consultation Questions

Do you agree with the Panel's initial unanimous view that both P329 Proposed and Alternative are better than the baseline?

Please provide your rationale with reference to the Applicable BSC Objectives.

Do you agree with the Panel's view that the Alternative solution is better than the Proposed solution, and therefore its initial unanimous recommendation that

- P329 Alternative should be approved and
- P329 Proposed should be rejected?

Please provide your rationale with reference to the Applicable BSC Objectives.

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

- Proposed Modification - 23 February 2017
- Alternative Modification - 29 June 2017

Please provide your rationale.

Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P329?

Please provide your rationale.

Do you agree with the Panel's initial view that P329 should not be treated as a Self-Governance Modification?

Please provide your rationale.

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

9 Recommendations

The BSC Panel initially recommends to the Authority:

- That P329 should not be treated as a Self-Governance Modification Proposal;
- That the P329 Alternative Modification should be **approved** and that the P329 Proposed Modification should be **rejected**;
- An Implementation Date for the P329 Proposed Modification of 23 February 2017;
- An Implementation Date for the P329 Alternative Modification of 29 June 2017;
- The draft BSC legal text for the P329 Proposed Modification; and
- The draft BSC legal text for the P329 Alternative Modification.

Workgroup's Terms of Reference

Specific areas set by the BSC Panel in the P329 Terms of Reference

What are the system requirements? This should include the non-functional requirements.

Does implementation later than 7 July 2016 have any effect (e.g. BSC Parties will need to comply with the REMIT Implementation Regulation from 7 July 2016)?

What changes are needed to BSC documents, systems and processes to support P329 and what are the related costs and lead times?

Are there any Alternative Modifications?

Does P329 better facilitate the Applicable BSC Objectives than the current baseline?

Assessment Procedure timetable

P329 Assessment Timetable

Event	Date
Panel submits P329 to Assessment Procedure	10 Dec 15
Workgroup Meeting 1	15 Dec 15
Assessment Procedure Consultation	21 Dec 15 – 13 Jan 16
Workgroup Meeting 2	18 Jan 16
Panel considers Workgroup's Assessment Report	11 Feb 16

Workgroup membership and attendance

P329 Workgroup Attendance			
Name	Organisation	15 Dec 15	18 Jan 16
Members			
Dean Riddell	ELEXON (<i>Chair</i>)	✓	✓
Simon Fox-Mella	ELEXON (<i>Lead Analyst</i>)	✓	✓
Francesca Scucces	P329 (<i>Proposer</i>)	☎	✓
Stephen Conway	Calon Energy Limited	☎	✓
Paul Coates	RWE	☎	☎
Gary Henderson	Everis for Scottish Power	☎	✓
Dan Webb	Seabank Power Limited	☎	☎
Graham Bunt	EDF	☎	☎
Andy Colley	SSE	☎	✗
Attendees			
Zaahir Ghanty	ELEXON (<i>Design Authority</i>)	✓	✓
Steve Wilkin	ELEXON (<i>European Coordination Manager</i>)	✓	✓
Tina Wirth	ELEXON (<i>Lead Lawyer</i>)	✓	✓
Austin Sharman	Ofgem	☎	✓
Peter Frampton	Ofgem	☎	✓
Steven Taylor	Quorum Development Ltd	☎	✓
Richard J Price	NGET	☎	✓
Ajilesh Thayath	NGET	☎	☎
Joseph Underwood	Drax	☎	✓
Lewis Mitchell	EDF	☎	✗
Jonathan Burgess	Centrica	✗	☎
Helen Stack	Centrica	✗	✓
Guy Phillips	Uniper UK Limited	✗	✗
Simon Reid	ScottishPower Energy Management Limited	✗	☎
Correspondence only			
Martin Mate	EDF	n/a	n/a
Bill Reed	RWE	n/a	n/a

Appendix 2: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronym	
Acronym	Definition
ACER	Agency for the Cooperation of Energy Regulators
BM	Balancing Mechanism
BMRA	Balancing Mechanism Reporting Agent (<i>BSC Agent</i>)
BMRS	Balancing Mechanism Reporting Service (<i>BSC System</i>)
BSC	Balancing and Settlement Code (<i>Industry Code</i>)
CSD	Code Subsidiary Document
CVA	Central Volume Allocation
DRM	De-rated Margin
ETR	European Transparency Regulation
EU	European Union
GB	Great Britain
GUI	Graphical User Interfaces
IDD	Interface Definition and Design (<i>Code Subsidiary Document</i>)
LoLP	Loss of Load Probability
MEL	Maximum Export Limit
MODIS	Market Operation Data Interface System (<i>NG's transparency system</i>)
NG/NGET	National Grid Electricity Transmission
REMIT	Regulation on Wholesale Energy Markets Integrity and Transparency
REST API	Representational State Transfer Application Programming Interfaces
RSS	Rich Site Summary
UI	User Interface
URS	User Requirements Specification (<i>Code Subsidiary Document</i>)
XML	Extensible Markup Language
XSD	XML Schema Definitions

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
3	BMRS on the BM Reports website	http://www.bmreports.com/
3	ACER public documentations on the ACER website	https://www.acer-remit.eu/portal/public-documentation
3	MODIS on the National Grid's webpage	http://www2.nationalgrid.com/UK/Industry-information/Europe/ETR-E-Modis/
5	EU legislation page on the ACER website	http://www.acer.europa.eu/the_eu_energy_market/legislation/Pages/default.aspx
5	P291 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p291/
18	Issue 63 page on the ELEXON website	https://www.elexon.co.uk/smg-issue/issue-63/
20	P305 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p305/
20	P295 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p295/