



BSC Review 2013 – Section V and Reporting

Meeting Name	BSC Panel 215
Meeting Date	8 August 2013
Purpose of paper	For Information
Summary	This paper summarises the 2013 BSC review, which has looked at Section V and reporting, and provides the conclusions from this review.

Scope of the 2013 BSC review

Section V of the BSC sets out details of the Balancing Mechanism Reporting Service (BMRS)¹ and the reporting requirements of BSC Agents. Section V Annex V-1 provides a detailed list of data that should be published on the BMRS. Section V contains a number of cross references to Section Q (in particular to the data items that the Transmission Company is required to submit to the Balancing Mechanism Reporting Agent (BMRA)) and the Reporting Catalogue, a Code Subsidiary Document (CSD) which contains further information on the contents of reports issued by the BSC Agents.

The relationships between these documents appear unnecessarily complex, which can lead to perceived inconsistencies in the information contained in each document and a perceived lack of clarity over the actual reporting requirements.

The 2013 BSC review looked to review the reporting requirements in Section V, Section Q and the Reporting Catalogue in order to remove any unnecessary duplication from these documents, resolve any inconsistencies and consider the most appropriate way to capture reporting requirements going forward. It also looked at the process for amending the BMRS, and considered whether the current process is the most appropriate mechanism or if there is a more efficient and economical way to amend the reporting service.

In addition to the above, the Panel requested that the review consider reporting and information published on the BSC Website and the 'ELEXON Portal'.

¹ <http://www.bmreports.com/>

Current Code Arrangements

BSC Section V 'Reporting'

Section V sets out two elements of reporting:

- 1) The details of the BMRS; and
- 2) Other requirements for reporting by BSC Agents or BSCCo to Parties, Ofgem and the public.

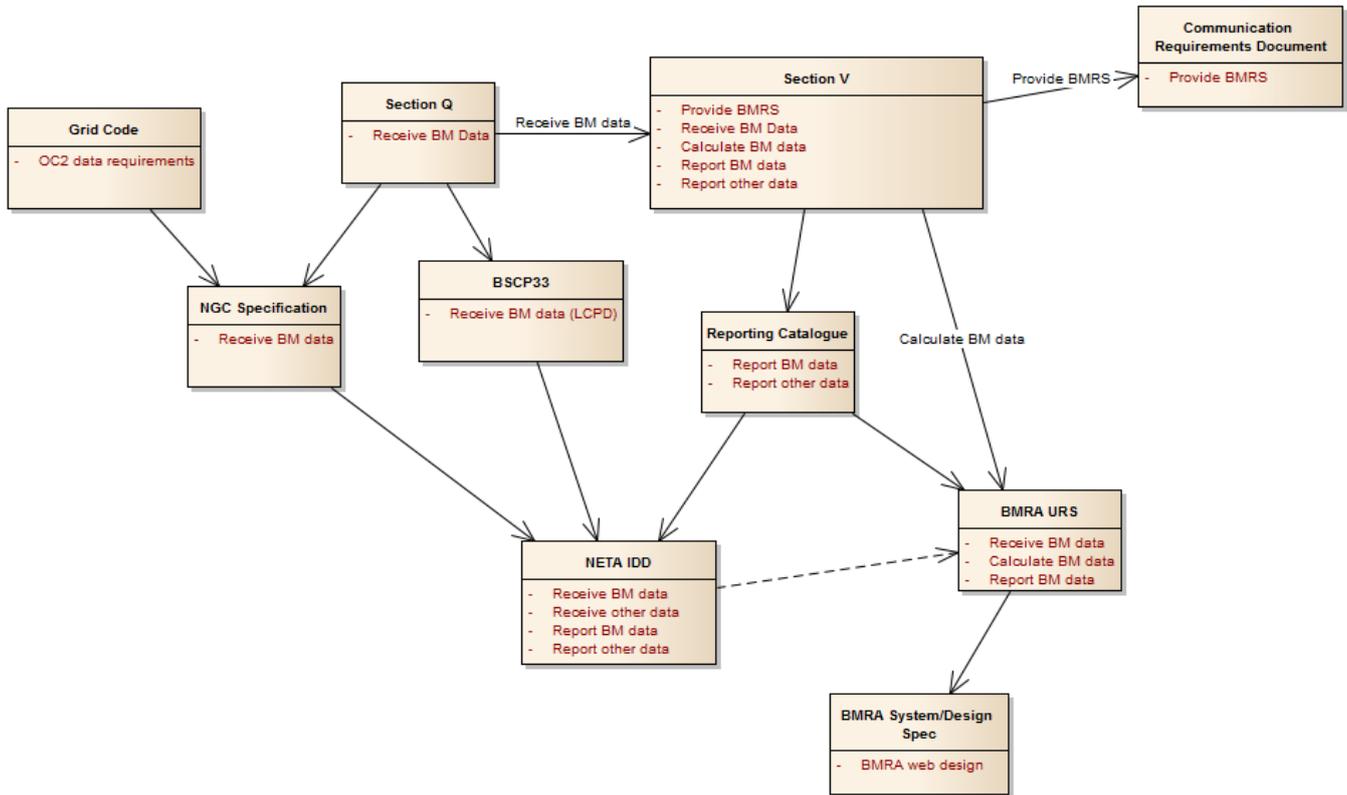
Details of BMRS reporting

Section V doesn't just define the data that is required to be reported on the BMRS, but it also sets out the specification of the service as a whole. This includes how the data is received, how indicative data is calculated, and the required provision of a High and Low Grade Service.

Section V establishes the requirements for BMRS reporting as follows:

- A Balancing Mechanism Reporting Service is required to be established in accordance with the relevant technical specifications contained in the Communication Requirements Document (a document that covers the communication between BSC Agents and Parties);
- The data receipt requirements of the BMRS are defined with reference where applicable to Section Q (for Balancing Mechanism data), Section K (for registration/BM Unit data), and Section T (for Market Index data);
- The calculation/data processing requirements of the BMRS are established;
- The data to be reported is defined, pursuant to any supplemental detail contained in the Reporting Catalogue;
- The Reporting Catalogue establishes or confirms the key reporting elements, but defers to the NETA Interface Definition Document (IDD) for the lower level detail on BMRS reporting;
- The NETA IDD combines with the BMRA User Requirement Specification (URS) to provide the complete set of user requirements for the BMRS system;
- Finally, the requirements are implemented into the BMRA systems via the System Specification and Design Specification.

The key interaction between the various Code Sections, CSDs and other Core Industry Documents in relation to the data that is reported on the BMRS are summarised in the following diagram:



BSCCo and BSC Agent reporting

The detail of reporting by BSCCo and BSC Agents is simpler than that documented for the BMRS, but is still rather detailed. The tables in Section V Annex V-1 summarise what data is required, how frequently it is required, in what format (i.e. a graph or table) and what default data should be used if the BMRS were to become unavailable. This information is then expanded in more detail in the Reporting Catalogue. In the case of CVA reporting, the full technical details are contained within the NETA IDD, while for SVA reporting, these are documented within the SVA Data Catalogue. In both cases, details will also be included in the relevant URs.

BSC Section Q 'Balancing Mechanism Activities'

Section Q sets out the requirements for submitting Balancing Mechanism data into the central systems. It contains many of the obligations on Parties (including the Transmission Company) to provide data where it's not already

required by other Code Sections. A lot of this data is submitted by the Transmission Company, and those requirements within Section Q often mirror the relevant requirements under the Grid Code.

It should be noted that only some of the data that the Transmission Company submits under Section Q is directly required for balancing, such as Final Physical Notifications (FPNs), bid-offer data or Balancing Services Adjustment Data (BSAD). The remaining data items are submitted purely for industry reporting purposes, such as Output Usable estimates or wind forecasts. This data is simply received and validated by the BMRA and subsequently published on the BMRS.

In general, Section Q identifies the data that Parties must submit, making reference to the Grid Code where necessary. For the Transmission Company, the exact data requirements for these submissions are established within the BMRA & SAA Interface Specification, which is owned by the Transmission Company but any changes to it are agreed with BSCCo. For data associated with the Large Combustion Plant Directive (LCPD), Section Q refers to BCS Procedure (BSCP) 33 for the details on the data requirements. All of these requirements are then detailed within the NETA IDD and in the SAA and BMRA URSs, ensuring that the systems are able to receive the various submissions correctly.

The relevant Code obligations are placed on the Transmission Company (or any other provider of data) in order to ensure that all the rules for data submission (such as the frequency and timing of submissions) are established properly, and that the provider is beholden to them. This is the case even if the data is not itself used in Settlement, but is to be handled under BSC governance using BSC systems. Consequently, a Modification is usually required to place the obligations on the relevant organisation(s), or at least reference the fact that they are the source of the information to be reported, under Section V.

Reporting Catalogue

The Reporting Catalogue is established under Section V1.4 of the Code as a CSD whose intent to set out the data items to be contained in each of the reports referenced in Section V Annex V-1. It was intended to act as a bridge between the high level reporting requirements within the Code and the more detailed user requirements for the central systems in the relevant CSDs.

However, the Code is rather inconsistent in the level of detail it provides, as many of the BMRS reporting requirements are defined very specifically within Section V Annex V-1. For example, the Code defines whether a particular item of data should be reported in tabular and/or graphical format, and often references specific report identifiers as they would appear in the BMRA & SAA Interface Specification. Consequently, when it comes to information posted on the BMRS, the Reporting Catalogue cannot offer any additional detail before it defers

downwards to the low-level detail in the relevant CSDs without duplicating what those lower-level documents subsequently lay out.

Section V Annex V-1 also defines the reporting by other BSC Agents and BSCCo, but at a higher level. This is subsequently expanded upon slightly within the Reporting Catalogue, before it refers onwards to the NETA IDD for more detail.

The only areas where the Reporting Catalogue goes into detail are where there are no other lower-level documents available to reference, such as Section 8 of the catalogue which lays out the information to be published by BSCCo on the BSC Website. However, if a specific document did exist to cover this aspect, it is likely that the Reporting Catalogue would instead defer downwards for this detail in order to avoid unnecessary duplication.

Reporting by BSCCo on the BSC Website

Section V4 lays out the requirements for reporting by BSCCo. It provides a list of data that BSCCo is required to report on the BSC Website, rather than on the BMRS. The data that BSCCo is required to report consists of:

- BM Unit details and related parameters such as Credit Assessment Load Factor (CALF) values;
- Other parameters such as the Credit Assessment Price (CAP), Transmission Loss Multipliers (TLMs), the coefficient 'α' and Line Loss Factors (LLFs);
- A list of registered Parties;
- Each Party's Funding Shares for each calendar month;
- Indicative and actual BSAD for each Settlement Period;
- System Buy/Sell Price (SBP/SSP) and Net Imbalance Volume (NIV) values for each Settlement Period as well as the Market Index Data (MID) used to calculate them; and
- Credit Default and Trading Dispute notifications.

Section V4.3.1 also provides provisions for the Panel to move any of this data (with the exception of CALF data) onto the BMRS in the future.

This operational information is currently published via a secure online web interface, referred to as the ELEXON Portal², which is maintained by ELEXON in parallel with the ELEXON website³, which focuses on the regulatory aspects. This interface is considered to be part of the BSC Website, but it could also be deemed a BSC Website in

² <https://www.elexonportal.co.uk>

³ <http://www.elexon.co.uk>



its own right under the definition that it is a website established and maintained by BSCCo for the purposes of the Code⁴.

To access information on the secure interface, a user is required to register an account with the Portal. It is free to set up an account, and anyone is able to do so regardless of whether they are a BSC Party or not. Once complete, the user will be able to access all freely-available information (including the information above that is required under Section V4). They will also be able to access information that is confidential to the relevant BSC Parties that they are affiliated with, if any; which Parties a user is considered affiliated with is determined through their existing authorisations under BSCP38 'Authorisations'.

It should be noted that publishing data through a separate secure web access interface is a commonly used approach, and better enables an organisation to meet the online security standards currently required. Many organisations that have such information that they need to publish online use this approach. It is therefore expected that this information will continue to be provided through a secure web interface going forward, but that such an interface will evolve in the future in line with technological advancements.

Concerns have been noted from some participants around the governance of the ELEXON Portal. Part of the data that is reported on this website is the data noted above that must be reported by BSCCo in accordance with Section V4. This data must therefore be available at all times, and so could not simply be amended or removed without an appropriate Modification first being approved. Considering the ELEXON Portal as part of the BSC Website makes it subject to the same governance as the main website. It should be noted that the governance arrangements for the BSC Website only covers what BSCCo is obligated to report through it, and does not provide specifications for the site itself; therefore technical or presentational changes to the BSC Website do not need to go through the BSC Change processes.

Much of the remaining data on the ELEXON Portal is not required to be reported in this way under BSC governance. This information is already provided to participants via their Flows; the ELEXON Portal simply provides it in an alternative, more user-friendly format. For example, Parties receive all the data on their credit cover and indebtedness history through the relevant Flows, which is the only obligated method for reporting this information under the BSC. However, the ELEXON Portal allows them to view this information graphically without needing to extract and manipulate the Flow data first, a feature that participants without the relevant resource to do this themselves find useful. It also provides other features that some participants find helpful, such as being able to sign up for email notifications regarding their own credit cover percentage or general credit default notifications; again this information is already provided in the relevant Flows, but participants may find the email alternative quicker and easier to use.

⁴ The BSC defines 'BSC Website' as meaning "the website established and maintained by BSCCo for the purposes of the Code".



In response to feedback that has been received, work is being undertaken with the ELEXON Portal to improve its usability. One area being looked at is the structure of the website, in order to allow users to locate and access the information more quickly and easily than at present. Consideration is also being given as to whether the freely-available information should be moved in front of the login process (i.e. a user would not have to create or log in to an account in order to view or access this information). Following such a change, only the confidential or Party-specific data would remain behind the login process. These improvements are being investigated, and any changes are expected to be rolled out in the near future.

Issues with the Current Arrangements

There appears to be three main issues with Section V and reporting.

Level of detail within Section V and Annex V-1

The general structure of the BSC is that the Code provides the principles and obligations, while the network of CSDs that sits beneath provide the relevant details of how these arrangements are to be carried out. However, Section V Annex V-1 provides significant amount of low level detail around reporting requirements that would normally be contained in a CSD. Examples of this include stating the format that a particular item of data should be reported in (such as graphical or tabular), or defining a specific report identifier (such as defining 'day ahead National Indicated Generation' as 'INDGEN'). These are details that would be more appropriate to be covered by the relevant CSDs as part of the detailed requirements.

Equally, all of the data items within Table 1 of Annex V-1 are already documented elsewhere in the BSC at a similar level of detail. These other sections, Sections Q6.1, Q6.3, Q6.4 and V2.6, place the obligations on the relevant participants to submit the information to the BMRA within given timescales. Table 1 then lays out what information must be published on the BMRS and the frequency and format that this must be done to.

It should be noted that the original intent of the Reporting Catalogue was to provide the detail around the BMRA outputs that are listed within Section V. However, the level of detail given within the Code itself means that there is very little that the Reporting Catalogue is able to add before it defers downwards to the more detailed documentation. Because of this, it is very difficult to change the Reporting Catalogue without also making changes to Section V. It is therefore questionable as to the value in having such a 'catalogue' if you cannot add, remove or update specific elements within it without needing to make corresponding updates to the Code too.

Making changes to the BMRS

Efficiency of making changes

Currently, any participant who wishes to make a relatively minor change to how a particular data item is reported on the BMRS, such as to add a graph for data that was only displayed as a table, would likely need to raise a Modification in order to make the corresponding change to Section V Annex V-1. This is in contrast to other areas of the BSC, where such detailed requirements would usually be held in a CSD, and a Modification would only be required where the change would impact the fundamental elements covered by the Code or would introduce new obligations.

Also, as part of the Modification process consideration is required as to how the proposed change would better facilitate the Applicable BSC Objectives. Historically it has proven difficult to measure the publication of data against these objectives even where there are obvious benefits for Parties.

Cost of making changes

Changes are made to the BMRS as and when they are required. However, changes to the BMRS are often relatively expensive to make, especially for a small change, and as such it is often inefficient to make changes individually. In cases like these, small changes may be put on hold until it becomes more cost-efficient to implement them, such as alongside a larger change. This has the potential to create a large level of uncertainty around the progression and implementation of changes that impact the BMRS, especially if the change is a relatively minor one.

A recent case in point is [CP1381 'Negative Wind Generation Forecast on BMRS'](#), which proposed a minor change to the BMRS to allow negative wind forecast values to be loaded automatically. The Imbalance Settlement Group (ISG), after noting the costs that would be incurred in making this change (approximately £34k), elected to place it on hold in December 2012 ([ISG140/02](#)) until such time as another suitable BMRS change was implemented. This would allow for cost-savings to be achieved by implementing this Change Proposal (CP) in parallel with another change to the BMRS. This CP has since been reassessed for parallel implementation alongside [P291 'REMIT Inside Information Reporting Platform for GB Electricity'](#), which would have a significant impact on the BMRS, and will be re-presented to the ISG for decision should this Modification be approved.

The architecture of the BMRS has remained largely unchanged since the inception of the BSC in 2001, and is designed to withstand the significant hit rate for the website due to the continual 'scraping' of data by some users, which can impact the user experience of the site. However, the design of the site means that making changes is often a more complex, time-consuming and thus costly approach compared to sites that use more modern technology. Technology has significantly advanced over the intervening 12 years, and will continue to advance at



ever-increasing rates. It is therefore possible that the BMRS could be upgraded to utilise these advances, which would incur significant one-off costs to do, but would result in on-going cost-savings when making subsequent changes as well as a better service for users.

Locating the data

As well as the potential duplication of reporting requirements between Code sections or documents, it is not always clear where the data is actually reported, such as whether it is available on the BMRS, the ELEXON Portal or the ELEXON website. For example, the data listed in Section V4 as needing to be published on the BSC Website could be moved on to the BMRS should the Panel so decide, which may make it more difficult for participants to locate the information should such a move be directed. One case to note is that the Code still requires Credit Default notifications to be published on the BSC Website (Section V4.2.7), but these notifications are actually published on the BMRS (although a participant may also choose to receive an email notification through the ELEXON Portal should they wish).

In addition, having these separate sites may cause issues with knowing what each entity provides and what the differences between them are. In particular, there can be confusion between the ELEXON website and the ELEXON Portal. As noted above, these two sites are both considered to be a part of the BSC Website, with data being published on the ELEXON Portal, but the parallel use of these names and inconsistency in their use can cause confusion with what is meant by each term.

Potential Solution

We believe that the above issues could be resolved by taking the following steps:

- Section V should be streamlined by removing all of the requirements and obligations around the BMRS, and reporting in general, and leaving only the necessary high level obligations. The detail removed from Section V would instead be captured within the Reporting Catalogue (as the appropriate CSD) since it is important that the list of data and reports that should be published is documented, along with associated details such as frequency and recipient.
- Under this solution, the BSC would state the requirement to provide the BMRS in accordance with the relevant CSD. It would also be possible to summarise the reporting obligations more simply by stating that BSCCo must publish all information as agreed by the Panel in accordance with the Reporting Catalogue.
- The Reporting Catalogue would be updated to reflect what data and reporting is published where (i.e. if the data is on the BMRS or the BSC Website). Consideration however should be given to the level of detail

captured in the Reporting Catalogue, for example whether it is necessary to stipulate that the information will be displayed graphically or in a table.

- At a suitable frequency, possibly annually or biannually, BSCCo will present an updated Reporting Catalogue which would highlight any changes to reporting since the last update, such as the publication of a new set of data on the ELEXON Portal. Once the Panel approve the amended Reporting Catalogue it will be circulated to the industry to notify Parties of any amendments. This ensures that all Parties continue to know what data is being published and where they can find it.
- At the same time as the above Reporting Catalogue update, BSCCo will present the Panel with a list of potential BMRS amendments that may be implemented together as a package of work. The Panel will then decide whether or not to approve the expenditure for those changes and approve the necessary changes to the Reporting Catalogue and related CSDs. For the avoidance of doubt, should a change to reporting require new obligations to be placed upon a Party or Parties a Modification will need to be raised and progressed via the relevant Modification route.

This solution would have the following benefits:

- The Reporting Catalogue would become the central document where all reporting information is captured. This allows Parties to easily see a summary of what reports are published as a result of obligations to send data under several other Code sections. It also removes potential confusion for Parties as to what data is published where and when. In effect the Reporting Catalogue becomes a single source of all reporting information.
- It simplifies the obligations in the Code, making them easier to understand and removes duplication within the BSC.
- It would streamline the requirements around the BMRS to allow for greater flexibility in making updates to the site. Any major upgrades to the BMRS would need to be signed off by the BSC Panel due to the potential impacts and the high levels of expenditure that would be involved, regardless of whether a Modification or CP would also be required. However, streamlining the requirements around the BMRS in this way would allow ELEXON greater scope to find the most efficient, cost-effective methods of providing the service that would give the most benefit to its users.
- It would also allow greater flexibility and efficiency in how the data and information is presented to users, with the potential to change existing graphs or introduce new graphs or other features that would add value or benefit to customers without necessarily needing to go through the BSC Change process.

- Aligning changes to the BMRS to be implemented as a single package would be a more efficient approach, and would allow for cost-savings to be realised as a result of parallel implementation.

In addition to using the Reporting Catalogue as the central document for showing where data should be published, we would also recommend that the term BSC Website is used in reference to both the ELEXON website and the ELEXON Portal, rather than making distinctions between the two sites. Essentially, the BSC Website would be deemed to encompass both the ELEXON website and the ELEXON Portal as a single entity with a secure online interface aspect for data reporting alongside a main website aspect. Any clarification in communication made within the Reporting Catalogue should therefore not make a distinction between the two sites, but should simply state that the information will be available on the BSC Website. This, when coupled with the compilation of all reporting requirements into one document, should remove any unnecessary confusion around how the data is published.

We would welcome working with the BSC Panel or any BSC Party in raising a Modification to progress these proposed changes.

Recommendations

The BSC Panel is invited to:

- **NOTE** the findings of the 2013 BSC Review.

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