

## P384 'The publication of European Electricity Balancing Guideline (EB GL) balancing data by BMRS'

P384 will ensure the BSC remains compliant with the European Electricity Balancing Guideline (EB GL) and the European Transparency Regulation (ETR) for the publication of balancing information.



ELEXON recommends P384 is progressed directly to the Report Phase with an initial recommendation to approve

This Modification is expected to impact:

- BMRS Users, including BSC Parties
- National Grid Electricity System Operator (ESO)
- Balancing Mechanism Reporting Agent (BMRA)
- ELEXON



## Contents

<b>1</b>	<b>Why Change?</b>	<b>3</b>
<b>2</b>	<b>Solution</b>	<b>5</b>
<b>3</b>	<b>Proposed Progression</b>	<b>8</b>
<b>4</b>	<b>Likely Costs and Impacts</b>	<b>9</b>
<b>5</b>	<b>Recommendations</b>	<b>13</b>
	<b>Appendix 1: Glossary &amp; References</b>	<b>14</b>
	<b>Appendix 2: P384 Implementation Phases</b>	<b>16</b>

---

### Contact

---

**Faysal Mahad**

020 7380 4375

faysal.mahad@elexon.co.uk



## About This Document

This document is an Initial Written Assessment (IWA), which ELEXON will present to the Panel on 14 March 2019. The Panel will consider the recommendations and agree how to progress P384.

There are three parts to this document:

- This is the main document. It provides details of the Modification Proposal, an assessment of the potential impacts and a recommendation of how the Modification should progress, including the Workgroup's proposed membership and Terms of Reference.
- Attachment A contains the P384 Proposal Form.
- Attachment B contains the proposed draft legal text to deliver the P384 solution.

---

288/06

P384  
Initial Written Assessment

---

7 March 2019

---

Version 1.0

---

Page 2 of 16

---

© ELEXON Limited 2019

# 1 Why Change?

## Background

### European Transparency Regulation (ETR) and EMFIP

The [European Network of Transmission System Operators for Electricity \(ENTSO-E\)](#) established the Electricity Market Fundamental Information Platform ([EMFIP](#)) to publish [European Transparency Regulation \(543/2013\) \(ETR\)](#) data from Transmission System Operators (TSOs) across the EU. Much of this data is similar to data that National Grid Electricity System Operator (ESO), and ELEXON publish (for GB only) on the [Balancing Mechanism Reporting Service \(BMRS\)](#) (e.g. forecast demand, forecast generation, aggregated balancing actions etc.). Since the implementation of [BSC Modification P295 'Transparency regulation data via the BMRS'](#) (and later amended with [CP1503 'Changes to European Transparency Regulation data'](#)) the BMRS has played a key role in meeting these obligations for GB; as market participants and ESO submit ETR data to EMFIP via the BMRS.

Currently, the BMRS sends data received from National Grid, along with data it has derived, to EMFIP. All the data is also published on the BMRS (so Parties have the option of accessing GB-related data from BMRS rather than EMFIP, which might be more efficient as the BMRS already publishes other data relating to the GB market). This data is in XML format and complies with XML Schemas which are detailed and maintained within the [ENTSO-E Manual of Procedures](#).

### The Electricity Balancing Guideline (EB GL) and LIBRA platform

The [Electricity Balancing Guideline \(EB GL\)](#), which entered into force on 18 December 2017, was developed to enhance the security of supply across Europe's electricity markets, by setting out the rules for the integration of balancing markets in Europe. It seeks to achieve this by establishing a pan-European energy market which consists of platforms where TSOs and Market Participants across Europe can exchange balancing energy.

In order to facilitate the sharing of balancing energy across borders, the EB GL has defined a set of "Standard Products" to be exchanged using pan-European platforms. TSOs are obliged to implement and make operational these platforms. The first of these obligations to come into force will be for the sharing of Replacement Reserves (RR) through the Trans European Replacement Reserves Exchange Project (TERRE). The standardised Replacement Reserve Platform (LIBRA) is the central European TERRE platform.

## What is the issue?

The BSC will be non-compliant with the EB GL Article 12.5 and ETR Article 17 unless changes to the BSC are made by 18 December 2019.

It is important to note that the [Department for Business, Energy and Industrial Strategy \(BEIS\)](#) assigned EB GL Articles 12.3 and 12.5 (amongst others) to BSCCo on 18 December 2017. Whereas, the ESO has the obligation to meet ETR Article 17.

EB GL Article 12.3 specifies the balancing information that needs to be published. This is currently being met by publishing the data on the BMRS. However, EB GL Article 12.5 requires this data to be published on EMFIP, by 18 December 2019.



### What is the Electricity Transparency Regulation (ETR)

The ETR sets out a requirement for the publication of a common set of data relating to the generation, transportation and consumption of electricity. It places an obligation on primary owners of this data to submit information to National Grid Electricity System Operator (ESO), as GB System Operator, for onward transmission to a Central European Platform (EMFIP).



### What is Project TERRE

Project TERRE is a key implementation initiative for the EB GL and aims to establish a pan-European market for Balancing Energy. The project seeks to design and develop a central platform to facilitate the close to real-time exchange of Replacement Reserves (balancing energy products) between Transmission System Operators (TSOs) in participating EU Member States.

288/06

P384

Initial Written Assessment

7 March 2019

Version 1.0

Page 3 of 16

© ELEXON Limited 2019

Currently, ETR Article 17 requires ESO, as the Great Britain (GB) TSO, to report a variety of balancing information. ESO is currently discharging this obligation by providing information for publication on the BMRS. As such, BMRS is acting as a third party data provider.

The ETR and EB GL regulations have interdependencies and overlaps in requirements. Once EB GL Article 12.5 comes into force, parts of ETR Article 17 will be supplemented by more detailed requirements found under EB GL Article 12.3 (a)-(e) of the EB GL. Consequently, ENTSO-E will withdraw certain ETR Article 17 reporting specifications as these obligations will be considered fulfilled by the new EB GL Article 12.3 reporting; the BSC needs to be changed to align to this. This will ensure ESO remain complainant with ETR Article 17 and BSCCo remain compliant with EB GL Article 12.

The Replacement Reserve Implementation Framework (RRIF), a legal document required under the EB GL to specify the requirements of the Replacement Reserve Balancing Energy Product and delivery platform (LIBRA), states that LIBRA will provide Replacement Reserve (RR) Standard Product data (as required by EB GL Article 12.3) to EMFIP, established under the ETR. As the LIBRA platform will be sending this data to EMFIP, the Balancing Mechanism Reporting Service (BMRS) will not receive the data from ESO, and thus BSCCo will not be able to publish the required EB GL Article 12.3 data, as assigned by BEIS. As such, BSCCo will be non-compliant with the responsibility assigned by BEIS to publish data as required by the EB GL Article 12.3(a)-(e). The BMRS therefore needs to be amended to pull the RR Standard Product data from EMFIP so that BSCCo remains complaint with the assigned responsibilities.

In summary the BSC currently does not, but will be required to:

1. Send EB GL Article 12.3 balancing information to the European data platform (EMFIP);
2. Amend the information reported on BMRS to meet ETR Article 17; and
3. Pull data from the European data platform (EMFIP) to publish the revised EB GL Article 12.3 information on BMRS.

## 2 Solution

### Proposed solution

The proposed solution, as set out in detail in the draft legal text provided in Attachment B is to ensure that the BSC is brought into line with the EB GL and ETR data publication requirements in order to avoid any unintended non-compliance. In summary:

- The new EB GL Article 12 publishing and submission requirements should be added to Section V 'Reporting';
- The removed ENTSO-E Manual of Procedures reporting requirements in regards to ETR Article 17 data should be removed from Section V;
- TSO obligations to provide required EB GL Article 12 data to be added to BSC Section Q 'Balancing Mechanism Activities';
- TSO obligations to provide the removed ENTSO-E Manual of Procedures reporting requirements in regards to ETR Article 17 data to be removed from Section Q 'Balancing Mechanism Activities'; and
- Procurement of EU Standard Product ETR data from the EMFIP platform to be published on BMRS. ELEXON will invoke APIs, made available by ENTSO-E on the EMFIP platform, and then publish the data on the BMRS.



#### 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

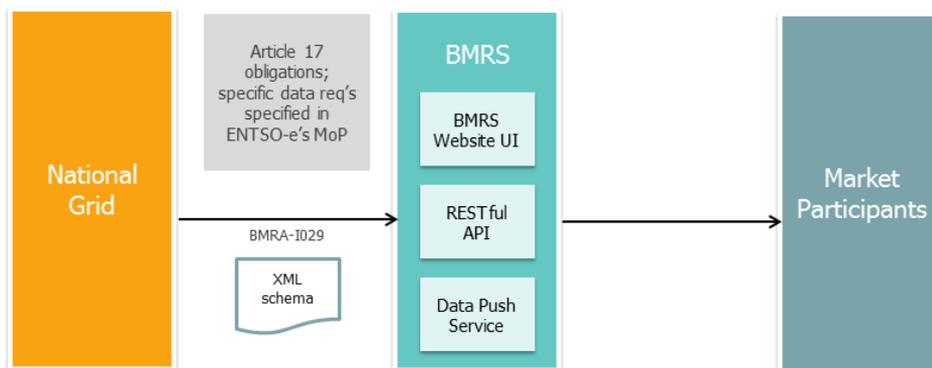
(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators

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

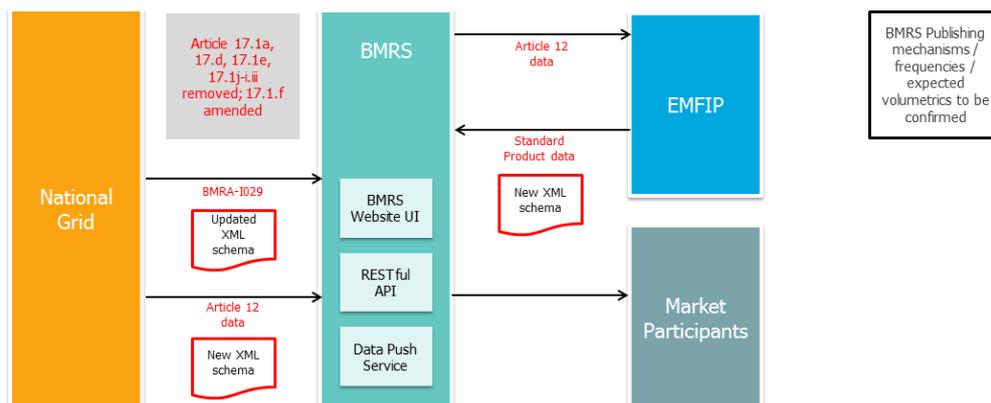
(g) Compliance with the Transmission Losses Principle

### Which processes are impacted?

#### As-is



#### To-be



288/06

P384

Initial Written Assessment

7 March 2019

Version 1.0

Page 5 of 16

© ELEXON Limited 2019

## Potential Legal Text conflict

It should be noted that this Modification proposes to amend BSC Section V and so does [P372](#) 'Speeding up the approval process for the publication of BSC data on the BMRS'. There are conflicts between these two sets of legal text. As a decision to approve or reject P372 will not be made until after a decision has been made for this Modification, there is a risk that a subsequent Modification will be needed to resolve the conflicts between the two sets of legal text.

## Applicable BSC Objectives

The Proposer believes this Modification would better facilitate Applicable BSC Objectives (c) and (e) compared with the existing baseline for the reasons set out below and so should be approved:

### Proposer views against Objective (c)

The Proposer believes this Modification will better facilitate Applicable BSC Objective (c) by the development of additional BMRS reporting and greater transparency. This additional availability of data will foster greater competition as it provides accurate and timely data, allowing for greater decision making and supporting new and innovative market strategies. Also, improving transparency and equal access to data provides a level playing field for all current and future Market Participants.

### Proposer views against Objective (e)

The Proposer believes that this Modification will better facilitate Applicable BSC Objective (e) as it will ensure the BSCCo and ESO compliance with Article 12 of the European Electricity Balancing Guideline (EB GL) and the ETR provisions of the submission and publishing of system balancing related information.

## Implementation approach

Implementation requires both BSC documentation and ELEXON Central System changes. The compliance deadline associated with the relevant EB GL and ETR requirements is 18 December 2019.

A two phase implementation approach, which is explained in further detail in Appendix 2, is proposed to meet the compliance deadline:

- Phase 1: a simple user interface providing data to market participants, to ensure compliance by 18 December 2019; and
- Phase 2: improved user experience and presentation of the data delivered under phase 1.

We propose, subject to this Modification being approved, that phase 1 is delivered on 18 December 2019 (under November 2019 Release governance) and phase 2 is implemented on 27 February 2020 as part of the February 2020 scheduled Release. Appendix 2 provides further details on phases 1 and 2.

The proposed P384 Implementation Date is 18 December 2019. The P384 legal text will be discharged in phase 1. We do not anticipate any changes to Code Subsidiary Documents for phase 2, but should the need arise we will raise a Change Proposal to deliver those documents on 27 February 2019.

### **Justification for implementation approach**

P344 'Project TERRE' was implemented on 28 February 2019. However, the associated Central System changes have been tied to the TERRE go-live and not a specific BSC Release. ELEXON is working to deliver the system changes for the expected TERRE go-live in December 2019.

P344 is the largest and most complex BSC Modification to date. It involves complex changes to multiple Central Systems and dependencies with external market participants and their systems. It is important to note that the requirement to deliver this Modification in parallel with P344 **increases the risk profile** of BSC Central Systems delivery.

Further, the interactions between P344 and [P354](#) 'Use of ABSVD for non-BM Balancing Services at the metered (MPAN) level', which is due for implementation on 1 April 2020, are also complex and challenging due to the short lead times between the Implementation Dates of the two Modifications.

Whilst the two phase approach does not remove the increased risk, it is a pragmatic mitigation to manage the risk of implementing a number of complex changes around the same time.

### Progression Route

The Proposer believes this Modification should be progressed straight to the Report Phase as the solution is self-evident. The solution has already been defined based on the requirements specified in the EBGL and ETR. These requirements are well understood as they build on work done for previous Modifications, such as P295. Further, there would be unclear benefits in submitting the Modification into the Assessment Procedure for further consideration of the solution by a Workgroup as the solution is clear and already defined. Lastly, submission into the Assessment Procedure would mean development of the solution would need to commence before the Modification was approved in order to meet the compliance deadline.

We therefore recommend that this Modification be progressed straight to the Report Phase, and be issued for a 10 Working Day (WD) Report Phase Consultation, with the Draft Modification report being presented to the Panel on 11 April 2019.

### Self-Governance

This Modification should be determined under Self Governance as it meets the Self-Governance criteria. This Modification updates information published on BMRS to meet EU legislation to support transparency of electricity balancing market data and therefore does not have a detrimental material effect. Whilst this Modification will better facilitate competition, through improved transparency, this is not expected to be material or detrimental.

Subject to this Modification being progressed under Self-Governance, the Final Modification report will be subject to a 15 Working Day appeal window in accordance with [BSC Section F](#) 'Modification Procedures' 6.4.1, which will close on Thursday 6 May 2019.

### Timetable

Proposed Progression Timetable for P384	
Event	Date
Initial Written Assessment presented to BSC Panel	14 March 2019
Report Phase Consultation	19 March 2019- 1 April 2019
Draft Modification Report presented to Panel	11 April 2019
Final Modification Report published	16 April 2019
Self-Governance Appeal Window (15 Working Days)	12 April 2019 – 6 May 2019



#### What is the Self-Governance Criteria?

A Modification that, if implemented:

- (a) is unlikely to have a material effect on:
  - (i) existing or future electricity consumers; and
  - (ii) competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution, or supply of electricity; and
  - (iii) the operation of the national electricity transmission system; and
  - (iv) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and
  - (v) the Code's governance procedures or modification procedures; and

(b) is unlikely to discriminate between different classes of Parties.

288/06

P384  
Initial Written Assessment

7 March 2019

Version 1.0

Page 8 of 16

© ELEXON Limited 2019

## 4 Likely Costs and Impacts

### P384 Estimated central implementation costs

Implementing the changes into BMRS required by this Modification will cost approximately £400k:

- Phase 1: 16 weeks lead time and ~£150k
- Phase 2: 24 weeks lead time and ~£250k

Additionally we expect 2 days effort to implement the document changes, equating to £480.

We would like to propose that industry are consulted on whether phase 2 (as described above and in more detail in Appendix 2) is required, as we are mindful that industry is subject to a large volume of change and want to ensure that this is delivering value for BMRS users and the timings do not generate risks to other changes. We recommend phase 2 is implemented as it will provide more robust validation, presentation of data and align to the approach for similar solutions.

We are continuing to explore options to meet the requirements and deliver this Modification for the best possible value on behalf of market participants.

### Anticipated industry costs

We do not anticipate there to be any market participant impacts or costs arising from the implementation of the solution to this Modification Proposal.

### Impacts

Impact on BSC Parties and Party Agents	
Party/Party Agent	Potential Impact
BSC Parties and Party Agents	P384 will amend existing data items on BMRS and will therefore impact users who use this data. New data items will also be published, so users may choose to amend systems and processes to use this data too. Specifically, the transparency data web page on the BMRS Website (B1760) will be revised which will mean BMRS users retrieving data will be impacted. A detailed description of the change is available in Appendix 2.

Impact on Transmission Company
ESO have stated, as a consequence of this Modification, they do not expect any impacts, as they have already incorporated its requirements into existing projects.

Impact on BSCCo	
Area of ELEXON	Potential Impact
Releases	Implement the changes to BMRS.
Configuration Management	Implement the changes to the BSC and Code Subsidiary Documents.

Impact on BSC Systems and processes	
BSC System/Process	Potential Impact
BMRS	<p>Process and publish the amended and new data sets.</p> <p>Please note: As part of the proposed solution, ELEXON plans to pull data from the ENTSO-E platform, EMFIP. ELEXON will not have a contract with ENTSO-E to use the EMFIP APIs, in the same way BMRS users do not have contracts with ELEXON to use the BMRS APIs. There is therefore a risk that EMFIP downtime impacts BMRS downtime. We have asked ENTSO-E to confirm their availability standards, but we are yet to receive a response.</p>

Impact on BSC Agent/service provider contractual arrangements	
BSC Agent/service provider contract	Potential Impact
CGI	Will implement changes to the BMRS that are required as part of the solution.

Impact on Code	
Code Section	Potential Impact
BSC Section Q 'Balancing Mechanism Activities'	<p>TSO obligations to provide required EB GL Article 12 data to be added to BSC Section Q</p> <p>TSO obligations to provide the removed ENTSO-E Manual of Procedures reporting requirements in regards to ETR Article 17 data to be removed from Section Q.</p>
BSC Section V 'Reporting'	The removed ENTSO-E Manual of Procedures reporting requirements in regards to ETR Article 17 data should be removed from Section V and the new EB GL requirements included.

Impact on Code Subsidiary Documents	
CSD	Potential Impact
NETA Interface Definition and Design Part 2 (NETA IDD Part 2)	<p>Changes will be required to implement the solution.</p> <p>The proposed changes will be developed and consulted on by September 2019.</p>

288/06

P384  
Initial Written Assessment

7 March 2019

Version 1.0

Page 10 of 16

© ELEXON Limited 2019

Impact on Code Subsidiary Documents	
CSD	Potential Impact
NETA Interface Definition and Design Part 1 (NETA IDD Part 1)	
BMRS Service Descriptions (SD)	
BMRS User Requirement Specifications (URS)	

Impact on other Configurable Items	
Configurable Item	Potential Impact
No impacts identified.	

Impact on Core Industry Documents and other documents	
Document	Potential Impact
Ancillary Services Agreements	No impact on any other Core Industry Documents, or other documents identified.
Connection and Use of System Code	
Data Transfer Services Agreement	
Distribution Code	
Distribution Connection and Use of System Agreement	
Grid Code	
Master Registration Agreement	
Supplemental Agreements	
System Operator-Transmission Owner Code	

**Impact on a Significant Code Review (SCR) or other significant industry change projects**  
 We don't believe that this Modification impacts any ongoing SCRs. We requested SCR exemption from the Authority on 5 February 2019.

**Impact on Consumers**  
 The day to day operation of Balancing and Settlement would remain unaffected so there would be no direct impact to consumers.

## Impact on the Environment

The day to day operation of Balancing and Settlement would remain unaffected so there would be no direct impact to the environment.

---

288/06

P384  
Initial Written Assessment

---

7 March 2019

---

Version 1.0

---

Page 12 of 16

---

© ELEXON Limited 2019

## 5 Recommendations

We invite the Panel to:

- **AGREE** that P384 progresses directly to the Report Phase;
- **AGREE** that P384:
  - **DOES** better facilitate Applicable BSC Objective (c); and
  - **DOES** better facilitate Applicable BSC Objective (e);
- **AGREE** an initial recommendation that P384 should be **approved**
- **AGREE** an initial P384 Implementation Date of 18 December 2019;
- **AGREE** the draft legal text;
- **AGREE** an initial view that P384 should be treated as a Self-Governance Modification; and
- **NOTE** that phase 2 will be delivered on 27 February 2020 (as part of the February 2020 BSC Release); and
- **NOTE** that ELEXON will issue the P384 Draft Modification Report (including the draft BSC legal text) for a 10 Working Day consultation and will present the results to the Panel at its meeting on 11 April 2019.

## Appendix 1: Glossary & References

### Acronyms

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

Acronym	
Acronym	Definition
API	Application Program Interface
BEIS	Department for Business, Energy and Industrial Strategy
BMRA	Balancing Mechanism Reporting Agent
BMRS	Balancing Mechanism Reporting Service
BSC	Balancing and settlement Code
BSCCo	Balancing and settlement Code Company
CSD	Code Subsidiary Document
EB GL	European Electricity Balancing Guideline
EMFIP	Electricity Market Fundamental Information Platform
ENTSO-E	European Network of Transmission System Operators for Electricity
EMR	Electricity Market Reform
ETR	European Transparency Regulation
ESO	Electricity System Operator
EU	European Union
IWA	Initial Written Assessment
RR	Replacement Reserve
RRIF	Replacement Reserve Implementation Framework
SCR	Significant Code Review
TERRE	Trans European Replacement Reserves Exchange
TSO	Transmission System Operator
XML	Extensible Markup Language

## 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	European Network of Transmission System Operators for Electricity (ENTSO-E) website	<a href="https://www.entsoe.eu/Pages/default.aspx">https://www.entsoe.eu/Pages/default.aspx</a>
3	European Transparency Regulation (543/2013) (ETR) website	<a href="https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF">https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF</a>
3	Balancing Mechanism Reporting Service (BMRS) website	<a href="https://www.bmreports.com/bmrs/?q=eds/main">https://www.bmreports.com/bmrs/?q=eds/main</a>
3	BSC Modification P295 'Transparency regulation data via the BMRS webpage	<a href="https://www.elexon.co.uk/mod-proposal/p295/">https://www.elexon.co.uk/mod-proposal/p295/</a>
3	CP1503 webpage	<a href="https://www.elexon.co.uk/change-proposal/cp1503/CP1503">https://www.elexon.co.uk/change-proposal/cp1503/CP1503</a>
3	Electricity Balancing Guideline (EB GL) webpage	<a href="https://www.elexonportal.co.uk/article/view/1310?cachebust=16sd5k1fis">https://www.elexonportal.co.uk/article/view/1310?cachebust=16sd5k1fis</a>
4	ENTSO-E Manual of Procedures	<a href="https://docstore.entsoe.eu/Documents/MCdocuments/TransparencyPlatform/MOP/00_ENTSO-EManualofProcedures_V2R1.pdf">https://docstore.entsoe.eu/Documents/MCdocuments/TransparencyPlatform/MOP/00_ENTSO-E Manual of Procedures_V2R1.pdf</a>
8	BSC Annex X-1' GENERAL GLOSSARY'	<a href="https://www.elexon.co.uk/documents/bsc-codes/bsc-sections/bsc-section-x-1-2/">https://www.elexon.co.uk/documents/bsc-codes/bsc-sections/bsc-section-x-1-2/</a>

288/06

P384  
Initial Written Assessment

7 March 2019

Version 1.0

Page 15 of 16

© ELEXON Limited 2019

## Appendix 2: P384 Implementation Phases

### Phase 1

- Retrieve data from EMFIP and make the data available on BMRS.
  - This data will be retrieved as provided and will not be validated further;
  - The data will be made available via the BMRS website and through APIs;
  - Data will be in its original XML format.
- Existing reporting for B1760 will be modified with a revised web page (including table), API, Data Push and TIBCO outputs.
- The current BMRS webpage on rules for balancing (B1710) will be updated to include new documents that are needed as part of EB GL Article 12.3.
- For other new or revised EB GL and Transparency reporting:
  - The existing B1740, B1750, B1810, B1820 & B1830 web pages will be modified so that users can select and download the data;
  - All new EB GL article 12 items will be accessible through a single web page, with the ability to select and download data for relevant articles, dates and periods in XML format only;
  - Users will be able to download this data from the website in XML format only; the data will not be tabulated on the web pages. All new and revised data will be made available through the BMRS APIs, but not Data Push or TIBCO.

### Phase 2

- Will improve the end-user experience by bringing the new webpages in line with the current standard of the BMRS website; this will include ensuring consistent look and feel and tabulation of data.
- Data retrieved from ENTSO-E will be validated and processed further so it can be delivered in more convenient format to users.
- Data will be made available to users in csv formats as well as XML
- Article 12 data will be made available via Data Push and TIBCO, in addition to the web pages and APIs.
  - Each report will be made available on its own page, instead of on a single page.