

# P399 WORKGROUP 1 SUMMARY

---

## Introduction

The Proposer highlighted that it was important to identify what we can do as a first step, versus what we can do later in a separate change. The general aim of P399 is to align the visibility of the non-BM data with the BM data.

## NGESO Updates

NGESO provided an update on initial questions provided, confirming they are open to providing greater transparency and seek to clarify exactly what the Workgroup want included in the BSAD so they can determine a cost estimate. NGESO outlined their expectation that the solution would include an identifier, the technology type and the location of the asset in question. They noted that a solution including these data items was entirely feasible, with the exception of the inclusion of technology type for VLPs/aggregators. They confirmed that NGESO does not currently publish technology type for non-BM.

They noted that this was all caveated with the outcomes of the legal questions regarding bilateral contracts, currently sitting with external lawyers. The expectation is that they will have formed a legal view by the end of the week, but it was confirmed that we should proceed on the assumption that the proposed changes will be legally permissible.

A Workgroup Member noted an email between Ofgem and the DCP 350 Workgroup, where they assert that Ofgem's approval of the Modification would address any legal risks associated with sharing customers' data. The Member also highlighted that NGESO should write to the parties with whom it holds bilateral contracts to ask whether they would be comfortable with the information being shared, reasoning that if they don't have a problem, this supports the case for change.

## Data Items

The Workgroup discussed what data items should be included in the BSAD:

- Asset ID
  - Required, NGESO to determine the naming convention
  - On its own this will not address the defect. It is the Asset ID paired with the below information that will address the defect and provide greater transparency
- Technology type
  - Akin to fuel type in the BM, useful information to have. Should adopt same categories as BM.
  - Unlikely to be able to provide for VLP/aggregator, but can flag trades where this is the case
- Party ID
  - Required for accurate transparency, as asset IDs alone are meaningless. Propose using the legal entity who has signed the bilateral contract with NGESO to provide the balancing service.
- Location
  - Required, NGESO to determine what level of granularity is possible
  - WG would like this to be as accurate as possible, but happy to work with GSP Group as a minimum
- Reporting speed
  - WG were mixed in how quickly they require this data, with some not overly concerned as long as it's available at some point and other downloading it as soon as it's available.
  - NGESO highlighted that they have the data prepared typically 15 minutes after the action and it then takes some time to format. Try to publish within an hour.
  - WG expressed that they'd like the data as close to real time as possible, otherwise 15 minutes after Settlement Period, otherwise 30 minutes, otherwise 45 minutes but would settle for an hour. NGESO confirmed they would assess these options as part of its impact assessment and report back.

## P399 WORKGROUP 1 SUMMARY

---

- Tendered status
  - A Workgroup Member queried whether a tendered status could be included. ELEXON and NGESO confirmed they would consider the cost of this and present it to the WG.
- SAA I014
  - A Workgroup Member pointed out that we would need to amend the Settlement Reports to include these details. The WG accepted that this would be an additional cost but is necessary for completeness.

The Workgroup also considered how the additional data would be reported (i.e. via one file or across multiple files and locations). It was noted that the BM does not include all this information in one file and so, if it is a level playing field we're after, this would go above and beyond. The Proposer highlighted that if there are efficiencies to be made in the reporting process then we should make every effort to do so. The Workgroup's ask was to include the data in the BSAD file, but they were open to other recommendations where justified. ELEXON and NGESO confirmed they would consider the cost of delivering all the data in a single file vs. splitting it up and present to the WG for consideration.

A Member also asked ELEXON if the current reporting timescales could be reviewed as part of this Proposal. ELEXON agreed to report back.

### Benefits

The WG was tasked with considering the benefits of this additional transparency. They noted that most are intangible, with one Workgroup Member highlighting the principle that competition is improved with greater knowledge, and greater competition means lower prices for consumers. NGESO provided a useful example in regards to targeted investment: where a single asset is being repeatedly utilised by NGESO in a highly specialised environment, no other party will be privy to the exact circumstances of that environment and the party in question can set their own price. If other parties were aware they would be able to invest assets in a similar manner and compete, lowering prices for consumers. A Member also commented that the greater the transparency the easier it is to find errors in different data sources, which will ultimately improve industry data quality. Furthermore, there is already a strong case for change, as this data has been reported for BM data for over a decade.

The WG agreed that, whilst the benefits of this Modification may be largely intangible, they are benefits nonetheless and were important to level the playing field with the BM.

### Industry Workstreams

NGESO highlighted that the implementation of P399 would not impact the C16 Consultation. They went on to confirm that P399 is not under consideration as part of the consultation and any amendments to the BSAD Statement will come solely from P399 – NGESO are able to change the BSAD statement whenever they choose, though an industry consultation is required. In this case, the industry consultation for P399 would suffice.

### Future Prevalence

NGESO confirmed that, in their view, the proportion of non-BM trades is unlikely to change in the immediate future. However, they did note that with TERRE, MARI and Brexit all in the pipeline, anything could happen. At this point it is a known unknown so we are continuing to operate as normal until the effects of these initiatives become clearer.

### Actions from the meeting

1. Subject to ELEXON providing business requirements, NGESO to determine the format and cost of the additional data, including:

## P399 WORKGROUP 1 SUMMARY

---

- a. The format of the Asset ID;
  - b. The cost of including tendered status;
  - c. Granularity of location data available and the associated cost;
  - d. Possible speed of reporting time and associated cost; and
  - e. The cost of including all the data in a single file vs. split up.
2. ELEXON to work with NGESO to ensure alignment during the development of BRs and legal text.

### Next steps

1. ELEXON to draft BRs and legal text for the WG to review before the next WG
2. WG members to confirm their availability for the next WG
3. Finalise Assessment Consultation after the next WG meeting and send to industry
4. NGESO to confirm legality question ASAP – due 31 Jan
5. ELEXON to investigate whether the existing BSAD reporting timescales should be updated as part of P399.