

CP Assessment Report

CP1583 'Rationalising publication of European Transparency Regulation (ETR) data on Elexon Systems'

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Committee

Imbalance Settlement Group (ISG)

Recommendation

Approve

Implementation Date

2 November 2023
(November 2023 Release)

About This Document

You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary¹](#).

This document is the Change Proposal (CP) Assessment Report for CP1583 which Elexon will present to the ISG at its meeting on 3 October 2023. The Committee will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1583.

There are 4 parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the ISG's initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachment A contains the CP proposal form.
- Attachment B contains the proposed redlined changes to deliver the CP1583 solution.
- Attachment C contains the full responses received to the CP Consultation.



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¹ <https://www.elexon.co.uk/glossary/?show=all>



Not sure where to start?

We suggest reading the following sections:

- Have 5 minutes?
Read section 1
- Have 15 minutes?
Read sections 1, 4, 5 and 6
- Have 30 minutes?
Read all sections
- Have longer? Read all sections and the annexes and attachments

Why change?

The ETR data published on the Balancing Mechanism Reporting Service (BMRS) was intended to provide additional insights to the market with approximately 40 reports currently available. This CP identifies several of these reports which are believed to be of minimal value to Elexon's customers as the data is duplicated in other reports, has had no data reported, or has been superseded by subsequent regulatory changes. Rationalising the reports, to only ETR data that adds value and provides useful insights to the Great Britain (GB) Market, will improve discoverability and transparency to market participants. This will also avoid costs of building the capability for these datasets on Elexon's new systems.

To confirm value of the reports Elexon has reached out to a variety of stakeholders to clarify their purpose in the market. Respondents from Generators and Traders supported the change and confirmed there is nothing in the data highlighted that they currently use or can see any intention to use in the future. Elexon also engaged with National Grid who confirmed they were happy for the change to be raised and invite consultation responses.

Solution

The proposed solution is to rationalise the publication of ETR data on Elexon systems by removing references to the redundant or superseded reports from BSC Code Subsidiary Documents (CSDs). This will remove the requirements for Elexon to publish those reports.

For the avoidance of doubt, the reports will continue to remain available on the existing BMRS system until Elexon transitions to a more modern data platform (Elexon Insights Solution) next year. The solution proposes that any duplicated datasets are published under REMIT so that the code obligations to publish all ETR data that is sent to Elexon are retained.

Impacts and costs

This is a document only change and the Elexon central implementation cost is <£1K.

Implementation

This CP is proposed for implementation on 2 November 2023 [Standard BSC Release]

Recommendation

We invite the **ISG** to:

- **AGREE** the amendments to the proposed redlining for BMRA User Requirements Specification for CP1583 made following the CP Consultation;
- **APPROVE** the proposed changes to the BMRA Data Catalogue and the BMRA User Requirements Specification for CP1583; and
- **APPROVE** CP1583 for implementation on 2 November 2023 as part of the standard November 2023 Release.

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2. Why Change?

What is the issue?

The ETR data published on BMRS was intended to provide additional insights to the market with approximately 40 reports currently available. This CP identifies several of these reports which are believed to be of minimal value to our customers as the data is duplicated in other reports, has had no data reported, or has been superseded by subsequent regulatory changes.

To confirm the value of the reports Elexon has reached out to a variety of stakeholders to clarify their purpose in the market. Respondents from Generators and Traders supported the change and confirmed there is nothing in the data highlighted that they currently use or can see any intention to use in the future. Elexon also engaged with National Grid who confirmed they were happy for the change to be raised and invite consultation responses.

Rationalising the reports, to only ETR data that adds value and provides useful insights to the GB Market, will improve discoverability and transparency to market participants. This will also avoid costs of building the capability for these datasets on Elexon's new systems.

The reports that this CP is looking to remove from being published are listed in a table in the Solution section of this document, along with the rationale for removing each report.

Background

The [European Transparency Regulation No 543/2013²](#) of 14 June 2013 on submission and publication of data in electricity markets came into force on 5 July 2013. The regulation mandates for a central information transparency platform to be operational 18 months after the regulation came into force, and for Transmission System Operators (TSOs) to submit transparency data from the operational date, or as soon as possible thereafter.

BSC Modification [P295 'Submission and publication of Transparency regulation data via the BMRS'³](#) was approved by the Authority on 22 January 2014 and implemented on 16 December 2014. As a result of P295, from 5 January 2015 onwards, GB market participants and National Grid Electricity System Operator (NGESO) have been submitting ETR data to the European Network of Transmission System Operators for Electricity (ENTSO-E) data platform, known as the [Electricity Market Fundamental Information Platform \(EMFIP\)⁴](#), via the BMRS. Elexon also publishes the data on the BMRS in parallel.

Brexit and ETR data

The UK left the European Union (EU) on 31 January 2020 and entered a Brexit transition period until 31 December 2020, during which the UK continued to be subject to EU rules. During the transition period market participants and NGESO reporting requirements under the ETR remained in place.

Elexon continued to submit ETR data to the ENTSO-E until January 2021 when it stopped sending data to ENTSO-E since there was no longer a legal requirement for the GB TSO to send the data to EMFIP.

² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32013R0543>

³ <https://www.elexon.co.uk/mod-proposal/p295/>

⁴ <https://transparency.entsoe.eu/>

What is the BMRS?

The [BMRS⁵](#) collects and publishes information about the electricity system in GB. Balancing Mechanism and System Related Information is sourced from the System Operator (National Grid), and Registration Information from the Central Registration Agent.

The BMRS performs and publishes indicative calculations of the Cash-out prices (System Buy and System Sell Prices) for each Settlement Period. This information is published on the BMRS website.

There are two grades of service provided. The High Grade Service allows the user a constant, high quality access to the BMRS via a dedicated network. The Low Grade Service uses the public internet to interface with the systems.

The service can be used by market participants to help make trading decisions and understanding market dynamics, and acts as a prompt reporting platform as well as a means of accessing historic data.

This includes:

- REMIT data – information provided by market participants to comply with Article 4 of Regulation on Wholesale Energy Market Integrity and Transparency (REMIT) Regulation (EU) 1227/2011
- Balancing Data – includes system prices, BMU data such as Final Physical Notification (FPN), Maximum Export/Import Limits (MIL/MEL), Bid Offer data
- Generation fuel mix forecast – including Wind Forecast Out-turn, Generation Output Useable (forecast) and Generation by Fuel Type (actual)
- Demand data – including Demand Day Ahead (forecast), Initial Demand Out-turn (actual) and Peak Demand data
- Electricity Data Summary: Includes nine frequently requested reports including System Prices, Generation by Fuel Type and System Demand
- Transparency: Data for the Transparency Regulation (EU) 543/2013 originating from the Transmission company and market participants
- Transmission: Balancing Mechanism data from the Transmission company and data includes System Operator to System Operator Trades (SO-SO), SO-SO Trade Prices and System Warnings

The BMRS data is accessible through the website, Application Programming Interfaces (APIs) and Data Push Service.

What is the Insights Solution?

The [Insights Solution⁶](#) is a cloud based data platform. It builds on the current industry-renowned BMRS platform and is expected to provide a richer, more up to date and detailed data service.

The Elexon Insights Solution is a key pillar of [Elexon Kinnect⁷](#), a digital customer-centric platform delivering a smart and flexible central data platform for the industry.

Through a number of releases over the next few years, the platform will publish BMRS data as well as Open Settlement Data.

Elexon's vision is to build on Elexon's data capabilities so that the Insights Solution becomes the 'go to' platform for the GB energy industry. The new Insights Solution will use

⁵ <https://www.bmreports.com/>

⁶ <https://bmrs.elexon.co.uk/>

⁷ <https://www.elexon.co.uk/settlement/bsc-central-services/elexon-kinnect-platform/>

cloud-based services to receive, process and publish data for the benefit of Elexon's customers, stakeholder and the industry.

How does BSC Modification P384 relate to the proposed solution for this CP?

P384 'The publication of European Electricity Balancing Guideline (EB GL) balancing data by BMRS'⁸ was raised by NGESO on 6 March 2019 to ensure that both the BSC and the National Electricity Transmission System Operator (NETSO) would be compliant with the EBGL, which required NETSO to publish balancing information on EMFIP and not BMRS.

P384 was unanimously approved by the BSC Panel as a Self-Governance Modification at its meeting on 9 May 2019 and implemented on 18 December 2019.

A number of reports listed in the table in the Solution section of this document are no longer required to be published on BMRS as they have been superseded by the changes implemented in P384 to publish this data on EMFIP.

⁸ <https://www.elexon.co.uk/mod-proposal/p384/>

3. Solution

Proposed solution

The proposed solution is to remove references to the reports listed in the table below from BSC Code Subsidiary Documents (CSDs). This will remove the requirements for Elexon to publish those reports.

Reference to the reports listed below to be removed from BSC CSDs			
Report Name	BSC Reference	ETR Reference	Rationale for removing
Planned unavailability of consumption units	B0710	7.1a	No data received
Changes in actual availability of consumption units	B0720	7.1b	No data received
Expansion and dismantling projects	B0910	9.1	No data received
Planned unavailability in the transmission grid	B1010	10.1a	No data received
Changes in actual availability in the transmission grid	B1020	10.1b	No data received
Changes in actual availability of off shore grid infrastructure	B1030	10.1c	No data received
Countertrading	B1320	13.1b	No data received
Rules on Balancing	B1710	17.1a	PDF Document superseded
Accepted aggregated offers	B1740	17.1d	No data received - superseded by Modification P384
Activated balancing energy	B1750	17.1e	No data received - superseded by Modification P384
Prices of activated balancing energy	B1760	17.1f	No data received - superseded by Modification P384
Volumes of exchanged bids and offers	B1810	17.1ja	No data received - superseded by Modification P384
Cross border balancing - prices	B1820	17.1jb	No data received - superseded by Modification P384
Energy activated	B1830	17.1jc	No data received - superseded by Modification P384
Imbalance prices	B1770	17.1g	Duplicated in System Prices

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Aggregated imbalance volume	B1780	17.1h	Duplicated in System Prices
Planned unavailability of generation units	B1510	15.1a	Duplicated in REMIT Reporting
Changes in actual availability of generation units	B1520	15.1b	Duplicated in REMIT Reporting
Planned unavailability of production units	B1530	15.1c	Duplicated in REMIT Reporting
Changes in actual availability of production units	B1540	15.1d	Duplicated in REMIT Reporting

For the avoidance of doubt, the reports will continue to remain available on the existing BMRS system until Elexon transitions to a more modern data platform (Elexon Insights Solution) next year. The solution proposes that any duplicated datasets are published under REMIT so that the code obligations to publish all ETR data that is sent to Elexon are retained.

This is a document only change that seeks to remove references of the above data from BSC Documentation, thereby releasing NGESO, BSC Parties or Elexon from BSC obligations to submit and publish this data.

Proposer's rationale

Streamlining the ETR data available to participants to only the data which is useful, adds value and provides useful insights to the GB Market, will improve discoverability and clarity for customers using the BMRS.

Elexon is also building the replacement system for BMRS labelled the Elexon Insights Solution. Removing those obligations will speed up transition to the Insights Solution and significantly reduce development costs for Elexon. Additionally Parties will no longer be required to submit outage ETR data (which is provided under REMIT) which will simplify the interface between Elexon, NGESO and BSC Parties.

Proposed redlining

Attachment B contains the proposed redlining to the BMRA Data Catalogue and BMRA User Requirements.

4. Impacts and Costs

BSC Party & Party Agent impacts and costs

Participant impacts

The implementation of this CP is not expected to have any impact on BSC Parties or Party Agents as our initial feedback from industry indicates the highlighted reports are not used or of no value to participants, although we will seek to confirm this through the Change Proposal Consultation.

Consultation responses did not identify any impacts to Parties or Party Agents.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
None	No impacts identified

Participant costs

Consultation responses did not identify any costs to Parties or Party Agents.

Central impacts and costs

Central impacts

Changes are required to the BMRA Data Catalogue and, BMRA User Requirements Specification to remove reference to reports which will no longer be published on the Elexon Insights Solution.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BMRA Data CatalogueBMRA User Requirements Specification	<ul style="list-style-type: none">No System Impacts

Impact on BSC Settlement Risks

Impact on BSC Settlement Risks
No impacts on the BSC Settlement Risks have been identified.

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Impact on Market-wide Half Hourly Settlement (MHHS)

Impact on MHHS

No impacts on MHHS have been identified

Central costs

This is a document only change. Changes are required to the BMRA Data Catalogue and BMRA User Requirements Specification.

The central implementation costs for this CP will be approximately £1K.

5. Implementation Approach

Recommended Implementation Date

CP1583 is proposed for implementation on 2 November 2023 as part of the November 2023 Standard Release. This will ensure that the requirements for Elexon to publish the reports identified are removed at the earliest opportunity.

For the avoidance of doubt, the reports will continue to remain available on the existing BMRS system until Elexon transitions to a more modern data platform (Elexon Insights Solution) next year. The solution proposes that any duplicated datasets are published under REMIT so that the code obligations to publish all ETR data that is sent to Elexon are retained.

6. Initial Committee Views

ISG's initial views

The CP1583 Progression Paper was presented to the ISG at its meeting on 1 August 2023. The ISG:

- **NOTED** that CP1583 had been raised;
- **NOTED** the proposed progression timetable for CP1583; and
- **DID NOT PROVIDE** any comments or additional questions for inclusion in the CP Consultation.

The ISG made no further comment on CP1583.

7. Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment C.

We received two responses to the consultation, 1 from a Distributor and 1 from a respondent who wished for their details to be redacted. Although their respondent details were redacted, their responses to the consultation have been provided in full.

Both respondents agreed with the proposed solution and implementation date, noting the CP will assist in streamlining and transparency and the importance of prioritising resources. No impacts or costs were identified by either respondent.

Summary of CP1583 CP Consultation Responses				
Question	Yes	No	Neutral/No Comment	Other
Do you agree with the CP1583 proposed solution?	2	0	0	0
Do you agree that the draft redlining delivers the intent of CP1583?	2	0	0	0
Do you agree with the proposed implementation approach for CP1583?	2	0	0	0
Do you have any further comments on CP1583?	0	2	-	-
Question	High	Medium	Low	None
Will CP1583 impact your organisation?	0	0	0	2
Will your organisation incur any costs in implementing CP1583?	0	0	0	2

Comments on the proposed redlining

Following the consultation period Elexon noted Article 15 1a, 1b, 1c, 1d have been removed from the Data Catalogue but they remained in the BMRA URS (C.7). Given this was detailed in the change documentation as a requirement to be removed, the BMRA URS has subsequently been updated to align the solution. This is not perceived to be a material change to the solution given the above and therefore there is no requirement to re-consult.

8. Recommendations

We invite the **ISG** to:

- **AGREE** the amendments to the proposed redlining for BMRA User Requirements Specification for CP1583 made following the CP Consultation;
- **APPROVE** the proposed changes to the BMRA Data Catalogue and the BMRA User Requirements Specification for CP1583; and
- **APPROVE** CP1583 for implementation on 2 November 2023 as part of the standard November 2023 Release.