

# Initial Written Assessment

## 'Speeding up the process for the publication of data on the BMRS'

To simplify the governance arrangements and reduce the timescales for the publication of data on the Balancing Mechanism Reporting Service (BMRS)



ELEXON recommends the Panel to raise the attached Modification Proposal in accordance with the provisions of Section F2.1.1(d)(i);



ELEXON recommends this Modification Proposal is progressed to the Assessment Procedure for an assessment by a Workgroup

This Modification is expected to impact:

- ELEXON

**ELEXON**

### Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

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## About This Document

This document is a recommendation to the Panel, by ELEXON, to raise a Modification Proposal (Attachment A) in accordance with [Section F2.1.1\(d\)\(i\)](#). If the Panel agree to raise the Modification Proposal, this document will form its Initial Written Assessment (IWA) and the Proposal Form will be updated and published on the ELEXON Website.

ELEXON will present the Modification Proposal to the Panel on 13 September 2018 and ask the Panel to consider its recommendations and decide whether to raise the Modification Proposal and how to progress it.

There are two 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 Modification Proposal Form.



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# 1 Why Change?



## Application programming Interfaces (API)

API, in the context of BMRS, is a set of programming instructions for participants to access BMRS data directly from their systems outside of the firewall.

## Background

The Balancing Mechanism Reporting Service (BMRS) is the primary channel for providing operational data relating to Great Britain's (GB) Electricity Balancing and Settlement arrangements, as well as REMIT<sup>1</sup> and European Transparency Regulation<sup>2</sup> data. It's used extensively 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. The BMRS has a wider user base both within and outside of the energy industry and includes traders, regulators, industry forecasting teams and academics.

Market participants can choose to receive the information via a 'high-grade' service for a charge (in accordance with [Section D 'BSC Cost Recovery and Participation Charges'](#)), where the information is sent to them directly via a TIBCO feed. The TIBCO software provides the mechanism for automated publication of BMRA data to a website. Alternatively, they can make use of the Application programming Interfaces (API), data push services or the BMRS Website, which are freely available to everyone.

## BMRS Reporting

BSC [Section V 'Reporting'](#) sets out details of the BMRS; and other reporting requirements from BSC Agents to Parties, the Authority and/or for public reporting. 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; and
- the data to be reported is defined, pursuant to any supplemental detail contained in the Reporting Catalogue.

In addition, 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 Central Volume Allocation (CVA) reporting the full technical details are contained within the NETA IDD, while for Supplier Volume Allocation (SVA) reporting, these are documented within the SVA Data Catalogue. In both cases, details are included in the relevant User Requirements Specification, which can be thought of as detailing the user/business requirements.

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<sup>1</sup> Regulation on Energy Market Integrity and Transparency, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32011R1227>

<sup>2</sup> Regulation on submission and publication of data in electricity markets, <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF>

## Reporting Catalogue

The Reporting Catalogue is established under Section V1.4 of the Code as a Code Subsidiary Document (CSD) whose intent is to set out the data items to be contained in each of the reports referenced in Section V Annex V-1. It establishes or confirms the key reporting elements, but defers to the NETA Interface Definition Document (IDD) for the data flow details. 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.

## NETA IDD

The NETA IDD details the relevant data flow structure, formats, data types and senders/recipients for the BMRS data.

## What is the issue?

The requirement to raise a Modification to make additions or changes to the data reported via BMRS is contributing to extended timescales for implementing these updates. The BSC is constructed in such a way that means the burden of governance can be reduced while maintaining appropriate oversight, by replacing the Modification process with the Change process. Furthermore, the scheduled delivery approach is overly restrictive for changes of this nature, which can result in longer implementation than necessary.

Usage of the BMRS continues to grow, particularly since the introduction of the API (Application Programming Interface) service. As an example, in April 2017 there were 336k data requests via the API service; in April 2018 that number had increased 1.2m and there are now 14k users accessing the BMRS APIs. It would be disappointing and extremely inefficient and costly, if the further use and evolution of the BMRS as industry's one-stop-shop for electricity market information was frustrated due to the constraints of the Modification Procedures.

## BMRS Governance

The general structure of the BSC is that the Code provides the rights, principles and obligations, while the CSDs that sit beneath, provide the relevant procedures, specifications and 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.

Further lower level detail for BMRS data is captured in the Reporting Catalogue or Interface Definition and Design Documents (IDDs); documents that are subject to the change control arrangements set out in BSCP 40 – 'Change Management'.

Examples of this lower level detail 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. 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.

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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.

## **BMRS Change Process**

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.

Once approved new or amended publication requirements are implemented within the scope of a scheduled BSC Systems Release which occur 3 times each year in February, June and November.

The timescales for raising, assessing, approving and implementing Modifications can be lengthy, with the end-to-end timescales for raising and implementing a Modification to publish new or amended BMRS data is on average 18 months (average taken from the previous eight Modifications related to BMRS reporting). Figure 1: Average end-end timescale for recent Modifications relating to the BMRS below shows the most recent Modifications relating to the BMRS and their corresponding length of time between raising the Modification and the Implementation Date. A breakdown of the various phases of the Modification process, along with associated time periods is also displayed.

Due to these visible elongated timescale, some industry participants are making their own publication arrangements rather than using the BMRS. This makes accessing data more arduous, adds complexity, and may reduce transparency, adversely impacting on competition.

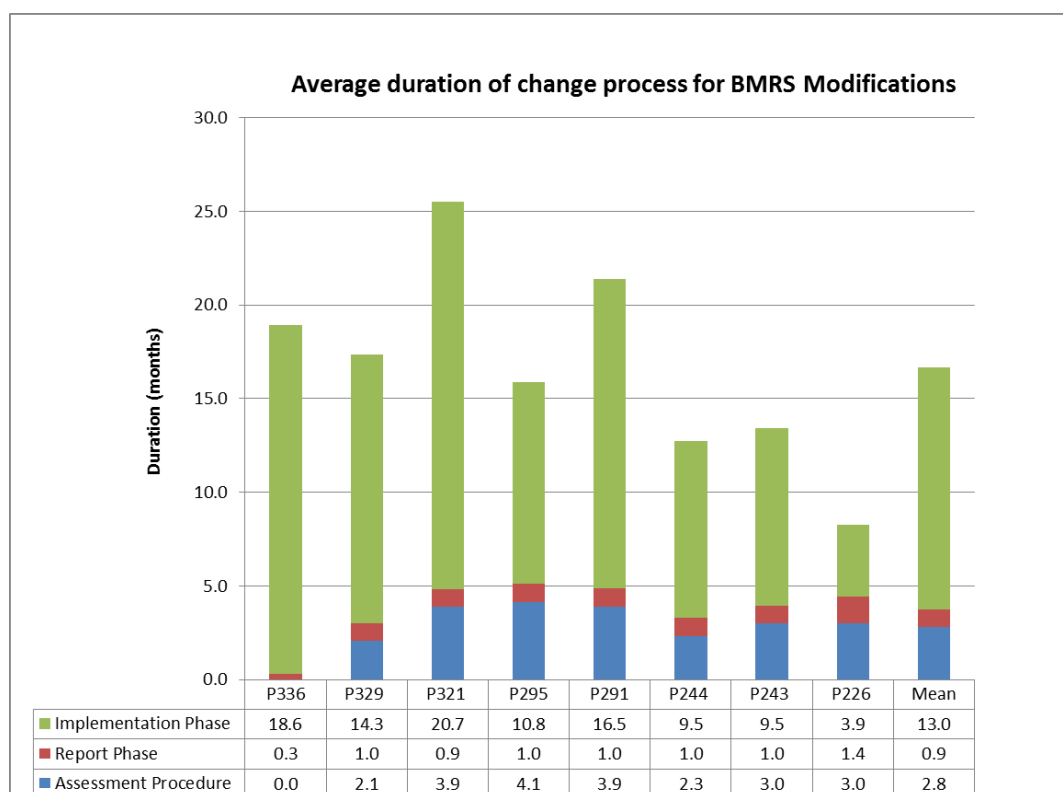


Figure 1: Average end-end timescale for recent Modifications relating to the BMRS

## Criticism

Over the last six to nine months we have observed increasing public criticism of the timescales for the publication of data on the BMRS. Set out below are some of the comments recently received:

- at National Grid's (NGs) October 2017 Operational Forum NG stated that it had considered using the BMRS as a publication route for its balancing services trades but had rejected the BMRS as being too slow to implement when coupled with the BSC Modification process;
- in their draft Forward Work Plan published on 12 February 2018, the National Grid Electricity System Operator (NG ESO) state that "Stakeholders have told us that they want information about trades enacted by the ESO to be published more quickly than via ELEXON"; and
- at National Grid's April 2018 Operational Forum NG stated that it is considering moving away from the BMRS because the change cycle takes too long.

A proliferation of websites all purporting to be the definitive source of electricity market information is wasteful, inefficient and particularly confusing and unhelpful for both existing industry members but also for new market entrants. Whilst we cannot demand that industry publish its electricity market data on the BMRS, we can ensure, through proportionate and flexible BSC Change Management processes that the BMRS is accessible and provides for a cost effective and timely publication mechanism.

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### Proposed solution

Section V should be streamlined by removing 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 an appropriate CSD or in an alternative BSC Panel controlled document, 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.

In summary, this Modification proposes to move a selection of reports, to be determined by the Modification Workgroup, currently set out in Annex V-1, to the Reporting Catalogue and/or IDD; or alternatively place certain reports in a separate BSC Panel controlled document. This would remove the need to progress a Modification. Instead, a Change Proposal would be progressed. These typically take around 3 months to get a decision. Alternatively, if using a Panel controlled document new items could be added immediately, leaving only implementation time. This will enable new and amended publication requirements to be managed through the BSCP 40 – Change Management process which will:

- enable ELEXON to proactively propose changes to the list, as ELEXON is able to raise Change Proposals whereas it cannot raise Modification Proposals, improving timescales for proposals for new or amended BMRS data;
- address the public perception that, when coupled with BSC Modification Procedures, changes to the BMRS are slow to implement; and
- introduce a more proportionate arrangement for the progression and implementation of changes that are determined to be of low risk and impact.

It should be noted that if implemented, proposals for new and amended publication requirements, managed through the BSCP 40 – ‘Change Management’ will be assessed and determined by the relevant Panel Committee (as set out in the [Baseline Statement](#)) rather than the Panel.

It is further proposed that the operational processes followed by ELEXON to determine the scope and content of BSC Systems Releases are reviewed to determine whether new and amended publication requirements could be delivered outside of the normal release schedule, in a more agile and flexible manner. This would:

- further improve publication timescales; and
- provide for a more flexible and proportionate implementation approach.

The approach proposed here is not new; the 2013 BSC Review report<sup>3</sup> made similar proposals. However, the report’s proposals did not achieve sufficient traction with Panel and industry and a Modification was not raised.

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<sup>3</sup> [https://www.elexon.co.uk/wp-content/uploads/2012/09/215\\_07\\_BSC\\_Review\\_2013\\_v1-0.pdf](https://www.elexon.co.uk/wp-content/uploads/2012/09/215_07_BSC_Review_2013_v1-0.pdf)

## Applicable BSC Objectives

We believe this Modification would better facilitate **Applicable BSC Objective (c)** and **Applicable BSC Objective (d)** for the reasons set out below:

### Views against Objective (c)

This Modification aims to simplify the process and reduce the timescales for the publication of data on the BMRS. This will provide a level playing field and give equal access to market data, facilitating competition by:

- improving transparency and equal access to data; providing a level playing field for all current and future market participants;
- getting closer to a single version of the truth, which also improves transparency over multiple locations of data; and
- avoiding the wasteful and inefficient proliferation of websites publishing electricity market information which is unhelpful for both existing industry members but also for new market entrants.

### Views against Objective (d)

This Modification would have a positive impact on the efficiency of the implementation of the Balancing and Settlement arrangements as it would:

- shorten the timescales for proposing, assessing and (where approved) implementing proposals to publish new or amend existing data on the BMRS;
- introduce a more proportionate and flexible arrangement for the progression and implementation of changes that are determined to be of low risk and impact;
- improve and extend the scope of the Panel's Self-Governance arrangements as decision making would be delegated to a Panel Committee and an Authority decision would not, generally, be required;
- ensure, through proportionate and flexible BSC Change Management processes, that the BMRS is accessible and provides for a cost effective and timely publication mechanism.

## Implementation approach

As this is a 'documentation only' change it is proposed that this Modification is implemented **5 working days** following an Authority decision, subject to impact assessment.



### 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

(g) Compliance with the Transmission Losses Principle

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### 3 Areas to Consider

In this section we highlight areas which we believe the Panel should consider when making its decision on how to progress this Modification Proposal, and which a Workgroup should consider as part of its assessment. We recommend that the areas below form the basis of a Workgroup's Terms of Reference, supplemented with any further areas specified by the Panel.

We believe that during the Assessment Procedure of this Modification, the Workgroup may wish to consider:

- whether there are circumstances, other than where the unanimous agreement of the Panel Committee cannot be reached and its decision is referred to the Panel, where the Panel may not wish to delegate its decision making powers, specifically in relation to the publication of data on the BMRS, to a Panel Committee; and
- the impact of implementing low risk changes outside the existing BSC Systems Release schedule;
- 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;
- if the reporting requirements should be captured in a CSD e.g. Reporting Catalogue or IDD or if it would be more appropriate if they are under the governance of an alternative BSC Panel controlled document; and
- are there any requirements that should remain under the governance of the BSC, specifically looking at Party consent to the publication of data in Section V.

In addition, consideration should be given to instances where a change to reporting requires new obligations to be placed upon a Party or Parties and whether a Modification would still be needed.

#### Areas to consider

The table below summarises the areas we believe a Workgroup should consider as part of its assessment this Modification:

Areas to Consider
Which reporting requirements should be moved into subsidiary documents – is there a criterion to assess against?
Do requirements need to be held in a CSD or could they fall under the governance of an alternative, Panel controlled document?
Are there any requirements which should unequivocally remain in the BSC itself?
What are the impacts of implementing low risk changes outside the existing BSC Systems Release schedule?
What changes are needed to BSC documents, systems and processes to support PXXX and what are the related costs and lead times?
Are there any Alternative Modifications?
Should this Modification Proposal be progressed as a Self-Governance Modification?

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#### Areas to Consider

Does this Modification Proposal better facilitate the Applicable BSC Objectives than the current baseline?

Will this Modification Proposal have an effect on consumers?

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### Next steps

This Modification should be assessed by a Workgroup and submitted into the Assessment Procedure.

### Workgroup membership

We recommend that the Workgroup assessing this Modification Proposal has expertise in the following areas:

- Electricity data reports and information; and
- Delivery of changes.

### Self-Governance

ELEXON recommends that this Modification should not be progressed as a Self-Governance Modification because it does not meet the Self-Governance Criteria (as set out in the Transmission Licence and repeated in BSC Annex X-1: 'General; Glossary'). Specifically, criterion (a) (v) which relates to the impact on "the Code's governance or Modification Procedures".

This Modification, if implemented, will alter the decision making capacity of the Panel and the Authority in relation to BSC Modification Procedures as such proposals (to publish new or amend existing reports on the BMRS) will no longer be progressed through the Modification Procedures and should the Self-Governance criteria not be met, submitted for decision, to the Authority.

### Timetable

The table below displays the proposed progression of the Modification.

Proposed Progression Timetable	
Event	Date
Present Initial Written Assessment to Panel	13 Sep 18
Workgroup Meeting 1	W/B 8 Oct 18
Workgroup Meeting 2	W/B 12 Nov 18
Assessment Procedure Consultation and Industry Impact Assessment	6 Dec 18 – 2 Jan 19
Workgroup Meeting 3	W/B 14 Jan 19
Present Assessment Report to Panel	14 Feb 19
Report Phase Consultation	19 Feb 19 – 5 Mar 19
Present Draft Modification Report to Panel	14 Mar 19
Issue Final Modification Report to Authority	21 Mar 19

### 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.

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## 5 Likely Impacts

This Modification will impact the roles undertaken by the Panel and the Authority to the extent that certain decisions that would have been made by the Panel or the Authority will now be made by the relevant Panel Committee.

This Modification will impact the following BSC documentation:

- BSC Section V 'Reporting';
- BSC Section V, Annex V-1: 'Table of Reports';
- the Reporting Catalogue; and
- the Interface Definition and Design Documents (IDDs).

Additionally, this Modification may also impact ELEXON's BSC Systems Release processes. No BSC Systems impacts have been identified.

### Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

This Modification does not impact any existing SCR or other significant industry change projects. The Proposer requests that this Modification be exempt from the SCR Process.

### Consumer Impacts

Day to day operation of balancing and Settlement will be unaffected so there will be no direct cost on consumers. However, there may be indirect benefits for consumers if BMRS changes are assessed and implemented more efficiently. No negative consumer impacts have been identified.

#### Impact on BSC Parties and Party Agents

Party/Party Agent	Potential Impact
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No implementation impacts identified	
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#### Impact on Transmission Company

No impacts identified	
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#### Impact on BSCCo

Area of ELEXON	Potential Impact
Releases	Changes to the BMRS potentially may be delivered outside of the standard three scheduled BSC Releases.
Supply Chain Management	Contractual agreements with the relevant service provider may need to be revised.

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#### Impact on BSC Systems and processes

No BSC System impacts have been identified

#### Impact on BSC Agent/service provider contractual arrangements

BSC Agent/service provider contract	Potential Impact
BMRA	Changes to the BMRS reporting potentially delivered outside of the three annual BSC Releases.

#### Impact on Code

Code Section	Potential Impact
BSC Section V	This Modification proposes to remove reporting requirements from Section V into subsidiary documents.

#### Impact on Code Subsidiary Documents

CSD	Potential Impact
Interface Definition and Design Documents	This Modification proposes to move the list of reports currently set out in Annex V-1, to the Reporting Catalogue and the IDD's.
Reporting Catalogue	

#### Impact on a Significant Code Review (SCR) or other significant industry change projects

No interaction or impact on the SCR has been identified.

#### Impact on Consumers

No impact identified

## 6 Recommendations

We invite the Panel to:

- **RAISE** the Modification Proposal in Attachment A (in accordance with F2.1.1(d)(i));
- **APPOINT** the Proposer's representative for the Modification;
- **AGREE** that this proposed Modification progresses to the Assessment Procedure;
- **AGREE** the proposed Assessment Procedure timetable;
- **AGREE** the proposed membership for the Workgroup; and
- **AGREE** the Workgroup's Terms of Reference.

## Appendix 1: Glossary & References

### Acronyms

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

Acronym	
Acronym	Definition
API	Application programming Interfaces
BMRA	Balancing Mechanism Reporting Agent
BMRS	Balancing Mechanism Reporting Service
BSC	Balancing Settlement Code
BSCP	Balancing Settlement Code Procedure
CSD	Code Subsidiary Document
CVA	Central Volume Allocation
ESO	Electricity System Operator
IDD	Interface Definition Document
IWA	Initial Written Assessment
NETA	New Electricity Trading Arrangements
NG	National Grid
SCR	Significant Code Review
SVA	Supplier Volume Allocation
URS	User Requirement Specification

### 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
2	BSC Sections page on the ELEXON website	<a href="https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/">https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/</a>
3	2013 BSC Review report	<a href="https://www.elexon.co.uk/wp-content/uploads/2012/09/215_07_BSC_Review_2013_v1-0.pdf">https://www.elexon.co.uk/wp-content/uploads/2012/09/215_07_BSC_Review_2013_v1-0.pdf</a>
3	BSC Sections page on the ELEXON website	<a href="https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/">https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/</a>
3	Business Definition Documents page on the ELEXON website	<a href="https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/business-definition-documents/">https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/business-definition-documents/</a>

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External Links		
Page(s)	Description	URL
3	Interface Definition Documents page on the ELEXON website	<a href="https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/interface-definition-documents/">https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/interface-definition-documents/</a>
7	Baseline Documents page on the ELEXON website	<a href="https://www.elexon.co.uk/documents/bsc-codes/bsc-sections/bsc-baseline-statement/">https://www.elexon.co.uk/documents/bsc-codes/bsc-sections/bsc-baseline-statement/</a>

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