

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

'Removal of BSC obligations to provide BMRS Data via TIBCO and the High Grade Service'

This Modification would remove the existing requirement within BSC Section V 'Reporting' for the Balancing Mechanism Reporting Agent (BMRA) to provide BMR Service (BMRS) data via the legacy High Grade Service, otherwise referred to as the TIBCO service. This Modification (document only) would effectively cease onboarding of new subscribers to the TIBCO service and enable Elexon to work with existing users to transition to alternative methods. The cost to provide the TIBCO service has become disproportionate compared to modern alternative methods. Since 2014, there have not been any new TIBCO users and the number of users has reduced by half to approximately 20 subscribers.



Elexon recommend that the Panel raise this Modification in line with BSC Section F2.1.1(d)(i)



Elexon recommends this Modification is progressed to the **Assessment Procedure** for an assessment by a Workgroup



Elexon **does not** consider it likely that this Modification will impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC

This Modification is expected to impact:

- TIBCO users (All BSC Parties)

337/03

Removal of BSC obligations to provide BMRS Data via TIBCO and the High Grade Service
Initial Written Assessment

13 April 2023

Version 1.0

Page 1 of 19

Contents

1	Summary	3
2	Why Change?	5
3	Solution	10
4	Areas to Consider	12
5	Proposed Progression	14
6	Likely Impacts and costs	16
7	Recommendations	19



Contact

Ivar Macsween

020 7380 4270

Ivar.Macsween@elexon.co.uk

[BSC.change@-
elexon.co.uk](https://www.elexon.co.uk/BSC.change@-)



About This Document



Not sure where to start? We suggest reading the following sections:

- Have 5 mins? Read section 1
- Have 15 mins? Read sections 1, 4, 5 and 6
- Have 30 mins? Read all sections
- Have longer? Read all sections and the annexes and attachments
- *You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary](#)*

This document is a recommendation to the Balancing and Settlement Code (BSC) Panel to raise a Modification Proposal (Attachment A) in accordance with BSC Section F2.1.1(d)(i).

Elexon will present this paper to the BSC Panel at its meeting on 13 April 2023. If the BSC Panel agrees 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 accordingly.

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 Proposal Form.

337/03

Removal of BSC
obligations to provide
BMRS Data via TIBCO and
the High Grade Service
[Initial Written Assessment](#)

13 April 2023

Version 1.0

Page 2 of 19



Elxon Kinnect

Elxon Kinnect is a digital customer-centric platform delivering a smart and flexible central solution for the industry, which will be delivered through a number of releases over the next few years. The modular technology it uses will enable us to implement BSC rule changes more quickly, and provide speedier support for innovation by existing companies and new entrants.

The Elxon Kinnect Insights Solution, which builds on our existing Balancing Mechanism Reporting Service (BMRS) to offer a richer and more detailed data service for GB electricity.



High Grade Service/TIBCO

The BMRS is made available as a High Grade Service and a Low Grade Service. The TIBCO software provides the mechanism for automated publication of BMRA data as part of the High Grade Service. BMRS data is also made available via the BMRS website.

337/03

Removal of BSC obligations to provide BMRS Data via TIBCO and the High Grade Service Initial Written Assessment

13 April 2023

Version 1.0

Page 3 of 19

What is the issue?

Elxon is currently modernising its technology and building a cloud based solution for its BSC Agents' systems as part of [Elxon Kinnect](https://www.elxon.co.uk/operational/kinnect-customer-solution/)¹.

While Elxon has continued to maintain TIBCO for the current subscribers, the service can no longer be sustained efficiently and economically. The BSC's High Grade Service and TIBCO software, based on 20-year-old legacy systems, present significant barriers for new entrants due to lead time, operational costs, and bandwidth restrictions. As a result there have been no TIBCO users since 2014. Further, the ageing architecture causes operational issues, limits scaling, and imposes high costs on market participants.

Elxon believe the time is right to remove the obligation to provide the unsustainable TIBCO service, to reduce costs for Parties and provide them with a modern, resilient, and cost-effective real-time data service. We believe the [Insights Real-Time Information Service \(IRIS\)](https://www.bscdocs.elxon.co.uk/bsc/bsc-section-v-reporting#section-v-2-2.3) is the right long term alternative and will explore this option as part of this Modification.

Furthermore, explicit reference to the High Grade Service in Section V is inconsistent with the idea that the BSC should be agnostic when it comes to specific technologies and vendors that deliver it, and this should be addressed via a BSC Modification.

Recognising the effort in maintaining TIBCO's current implementation and the Elxon drive to optimise costs for industry with a cloud based architecture, [Issue 95 'Assessing the continued use of TIBCO service as a source of data for market participants'](https://www.bscdocs.elxon.co.uk/smg-issue/issue-95/)² made a group recommendation to raise a BSC Modification to explore the removal of the obligation for Elxon to provide BMRA data through the High Grade Service.

What is the proposed solution?

This Modification seeks to remove the obligations for the BMRA to provide BMRS data via the High Grade Service. Based on the current view of the solution, this could be achieved by amending [Paragraph 2.3 'Grades of Service' of Section V](https://www.bscdocs.elxon.co.uk/bsc/bsc-section-v-reporting#section-v-2-2.3)³. However it may be necessary to amend more areas of Section V, the BSC or its Code Subsidiary Documents (CSDs) which will become clear over the course of assessment of this Modification.

This Modification seeks only to remove the obligation to publish BMRS data via a leased line (High Grade service) using TIBCO as the underpinning technology and does not propose to amend other existing obligations around the content or timeliness of reporting BMRS data.

This Modification would effectively cease onboarding of new subscribers to the service and enable Elxon to work with existing users to transition to alternative methods. In practice, due to the high cost, lead time and network constraint, TIBCO is already effectively closed to new subscribers.

While the necessary changes to remove these obligations can be made via a relatively simple and non-impactful change to the BSC, Elxon recognise that an industry Workgroup

¹ <https://www.elxon.co.uk/operational/kinnect-customer-solution/>

² <https://www.elxon.co.uk/smg-issue/issue-95/>

³ <https://bscdocs.elxon.co.uk/bsc/bsc-section-v-reporting#section-v-2-2.3>

should be formed to consider the wider impacts that retirement of TIBCO would have (following this Modification rather than as a direct result of it) and consider feedback from existing TIBCO users, the Issue 95 group and the BSC Panel.

Impacts and costs

This Modification is likely to be a document-only change that would prevent any new Parties from signing up to use TIBCO and enable Elexon to work with existing users to move them to alternative methods.

The wider impacts of retiring the TIBCO service and replacing it with a suitable alternative, expected to be the IRIS solution will be considered and discussed.

While expected to be low, the exact costs for delivering this Modification will be determined as part of the Assessment Procedure. The costs for existing TIBCO users to migrate to an Alternative method will be assessed as part of the Workgroup assessment. Currently, we estimate the costs to be low to medium.

Implementation

This Modification should be implemented as soon as possible to allow BSCCo to continue to modernise its systems and conduct further work on behalf of industry regarding the future of TIBCO and provision of BMRS data. As a document-only change, it may be suitable to implement this change 5 Working Days after approval, however this approach will be discussed and verified by the Workgroup.

Recommendation

Elexon invite the BSC Panel to raise this Modification Proposal in accordance with [BSC Section F 'Modification Procedures'](#)⁴. Elexon recommends this Modification is progressed to the Assessment Procedure for an assessment by a Workgroup.

⁴ <https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures>

2 Why Change?

What is the issue?

Elxon is currently modernising its technology and building a cloud based solution for its BSC Agents' systems as part of Elxon Kinnect.

At the time of inception in 2001, the BSC recognised the need for access to close to real-time BMRS data and introduced provisions for the 'High Grade Service' (a private Wide Area Network) and licensed software, TIBCO, to enable participants to sign up to the service. The High Grade Service is built on legacy systems, which are now over 20 years old. It provides BMRS data close to real-time, and customers wishing to receive TIBCO data require both a High Grade line and a TIBCO license. These requirements have long been recognised as a barrier for new entrants, particularly the lead time, operational costs and bandwidth restrictions of the High Grade line.

The ageing architecture has been unable to provide the required scaling to cater for Elxon's users and suffers from sporadic operational issues/unplanned outages as well as being incapable of accommodating industry changes at pace. The legacy architecture severely limits vertical and horizontal scaling and the constraint on bandwidth means users do not always receive the complete data updates⁵.

In practice due to the high cost, lead time and network constraints, the TIBCO/High Grade Service is effectively closed to any new subscribers who wish to make use of it.

High operational costs of maintaining the legacy architecture are passed on to all market participants and end consumers. TIBCO users bear additional costs for proprietary software and the required leased network lines. The legacy charging model (applied upon inception of the High Grade Service, mean that Elxon operational costs for TIBCO are not ring-fenced, resulting in all BSC Parties funding the majority of the operational costs.

The current version of TIBCO will run out of support unless a significant technical upgrade is carried out. It is Elxon's view that the TIBCO Service cannot be efficiently implemented onto the new cloud platform and that the only way to continue to fulfil this obligation would be to maintain the legacy system by migrating it to Elxon Kinnect at great cost and complexity.

Elxon commits to provide a resilient, high availability, real time data service through more modern data endpoints as a replacement to the High Grade Service's ageing on-premise infrastructure which can no longer be sustained efficiently and economically. We believe the IRIS is the right long term alternative and will explore this option as part of this Modification.

These explicit requirements conflict with the principle that the BSC should be agnostic when it comes to specific technologies and vendors that deliver it and, therefore, reference to requirements for the High Grade Service should be addressed via a BSC Modification.

Background

Balancing Mechanism Reporting Service

The BMRS is a service provided by the BMRA. The BMRS is, amongst other methods, made available as a High Grade Service and a Low Grade Service. The Low Grade Service is free

⁵ 2-156 Weeks ahead by BMU is restricted to once daily updates on legacy endpoints.

337/03

Removal of BSC obligations to provide BMRS Data via TIBCO and the High Grade Service
[Initial Written Assessment](#)

13 April 2023

Version 1.0

Page 5 of 19

to BSC Parties, whereas provision of the High Grade Service is subject to certain charges as specified in Section D. Any Party or any other person can request the High Grade Service. The specification for the BMRS is in the Communication Requirements Document and the High Grade and Low Grade Services must be made available in accordance with that specification. Where the High Grade Service is made available to a person other than a Party, the person must enter into an agreement with Elexon. The person must also agree to pay a one-off administration charge and charges equivalent to those payable by Parties for use of the High Grade Service.

The BMRS was implemented after the New Electricity Trading Arrangements (NETA) went live in 2001 to provide the GB electricity industry with operational data relating to the Balancing and Settlement Arrangements. Since inception, the BSC has made provision for publication of BMRS data to participants via multiple methods including a High Grade leased line as well as the public internet. When using the High Grade line, BMRS users can subscribe to a licensed software product, TIBCO Rendezvous, which provides a mechanism to consume BMRS data.

TIBCO and Data Push Service (DPS)

Since 2014, the current BMRS has offered a Data Push Service (DPS) as a cost effective alternative to TIBCO and consequentially there have been no new TIBCO subscriptions since this date. The overall number of TIBCO users has also decreased by over 50%, leaving around 20 organisations with active subscriptions.

While Elexon has continued to maintain TIBCO for the current subscribers, the service can no longer be sustained efficiently and economically. The current TIBCO set-up is based upon "on premise" communications hardware and is not readily supported by cloud based architecture, which is part of Elexon's stated business plan. Therefore it would add significant complexity to migrate this to Kinnect in its current form. In addition to this, the legacy architecture will run out of support unless a significant technical upgrade is carried out.

As the TIBCO Service cannot be efficiently implemented on the new cloud-based platform (Kinnect), the only way to continue to fulfil the TIBCO obligation (as described within the Code) would be to maintain the legacy system. However, the ageing infrastructure is unable to provide the required scaling to cater for our users and suffers from sporadic operational issues/unplanned outages as well as being incapable of accommodating industry changes at pace. The Legacy architecture severely limits vertical and horizontal scaling and the constraint on bandwidth means users do not always receive the complete data updates⁶.

As such, there is no zero-change option.

The high operational costs of the legacy infrastructure are passed on to all market participants and end consumers. TIBCO users bear additional costs for proprietary software and the required leased network lines. The legacy charging model means Elexon has not ring fenced operational costs for TIBCO, resulting in all BSC Parties funding the majority of the operational costs. Whilst it is hard to isolate costs, due to shared infrastructure across central systems, a full assessment will be carried out to provide an accurate view and some residual costs will continue until all legacy applications are fully migrated.

⁶ 2-156 Weeks ahead by BMU is restricted to once daily updates on legacy endpoints.

Insights Solution Realtime Information Service (IRIS):

Elexon's data strategy is to unify data structures across all its endpoints and ease onboarding for all our users through open source protocols, avoiding proprietary licensed software to reduce both central and BSC Parties cost.

Elexon is currently modernising its technology and building a cloud based solution for its BSC Agents' systems as part of Elexon Kinnect. As part of the programme, the new BMRS labelled Kinnect Insights Solution is being implemented to deliver all reports and publication capabilities from the legacy BMRS platform by the end of 2023. We believe Insights should replace the legacy BMRS, as noted by feedback from users who trialled the platform and the BMRS Change Board.

The Insights Solution provides three endpoints for accessing data: a website for interactive users, RESTful APIs and a real-time data subscription service referred to as Insights Solution Realtime Information Service (IRIS). The IRIS service has been available for organisations to sign up to since December 2022 and in total 108 subscribers have signed up so far. Interested participants can register to receive the updates on the [Insights Solution site](#)⁷.

The Insights platform is being developed using Agile principles with each iteration providing fully tested and accepted functionality in a production environment, available to customers as a Beta version. Since launching as a Beta offering to wider industry in June 2022, early adopters⁸ have sent in highly positive feedback about performance, functionality and availability of the new platform. It should also be noted that during recent unplanned BMRS outages the Insights solution provided a resilient and available service to Elexon data users (since January 2023, the Insights Solution has average availability 99.98% across all endpoints compared to 99.8% BMRS).

In practice due to the high cost, lead time and network constraint, TIBCO/High Grade Service is effectively closed to new subscribers. IRIS will address the issues faced by onboarding of TIBCO users with website registration flow and ready-to-go code clients. Connection can be established within 10 minutes and the subscription established with 1 day development effort (notwithstanding the effort to integrate the new endpoint within customers' processes).

Elexon have already built approximately 50% of the BMRS reports on Insights and by June this year, we will include REMIT and Transparency data and build the Settlement calculations engine to include system prices and imbalance volume. We expect this to be in place by the end of the year.

Issue 95 'Assessing the continued use of TIBCO service as a source of data for market participants'

Recognising the effort in maintaining current implementation and the Elexon drive to optimise costs for industry and enable the benefits of a cloud based architecture, Issue 95 was raised to assess the continued use of TIBCO and High Grade requirements for BMRS data.



What are RESTful APIs?

A RESTful API is an interface that two computer systems use to exchange information securely over the internet

⁷ <https://bmrs.elexon.co.uk/iris>

⁸ 2.1 Million hits on APIs and 108 IRIS subscribers in the last 30 days

337/03

Removal of BSC obligations to provide BMRS Data via TIBCO and the High Grade Service
[Initial Written Assessment](#)

13 April 2023

Version 1.0

Page 7 of 19

In the Issue 95 Proposal Form, Elexon suggested that the following questions form a 'terms of reference' for the Issue Group to aid the flow of discussion.

- How is TIBCO currently used by market participants and to what extent?
- What would the implications of discontinuing TIBCO be?
- What would the implications of continuing to use TIBCO be? Are there any associated opportunity costs to its continued support?
- Is there merit in supporting a High Grade service in the future?
- If deemed appropriate, what would be the best approach to phase out TIBCO service?

The BMRS Change Board (BCB) endorsed the progression of this Issue [at their meeting](#)⁹ on 23 March 2021.

Feedback received during Issue 95

Over the course of Issue 95 meetings, members described their experience that, since implementing TIBCO about 10 years ago, they had found it to be robust and stable, with issues limited to the physical line rather than the software. However, they would be open to a new method, if that method is as fast and stable as TIBCO, acknowledging that TIBCO is expensive and can be difficult to implement.

Issue Group members highlighted the following issues with TIBCO:

- On-premise infrastructure is inefficient and costly to maintain;
- The requirement for a high-grade line presents a barrier to new users;
- It is unscalable - restricting new data being added to the platform;
- It suffers unplanned outages - industry need something more reliable;
- It requires customer licences, leading to more costs for users; and
- The data structures are inconsistent with Data Push and API, and this should be simplified.

During the course of the Issue group meetings Elexon reaffirmed to the group that, should TIBCO be discontinued, an alternative without the identified issues would be developed and made available. In later meetings, prototypes of the IRIS solution were demonstrated, with the group noting the benefits that IRIS seems to offer vs TIBCO and accepting that the current iteration of TIBCO has its limitations and drawbacks.

The group believed there were sufficient grounds to raise a BSC Modification to explore the removal of the obligation for Elexon to provide TIBCO. In principle, the group were provisionally comfortable with the replacement of TIBCO with a viable alternative that meets the industry's needs for reliability and speed of service but note that this will be assessed at a later date, with further cost benefit information to be sourced to present the case for industry at the appropriate time.

337/03

Removal of BSC obligations to provide BMRS Data via TIBCO and the High Grade Service Initial Written Assessment

13 April 2023

Version 1.0

Page 8 of 19

⁹ <https://www.elexon.co.uk/meeting/bcb-4/>

The BSC Issue Group concluded in November 2022 with the recommendation to raise a BSC Modification to remove the obligation for Elexon to provide BMRA data through the High Grade Service.

Decommissioning of TIBCO and communication to users

On 16 March 2023 [Elexon wrote to current TIBCO users](#)¹⁰ (20 in total) stating our intention to decommission the TIBCO Service and the High Grade line in March 2024. Recipients were informed that development of new cloud platform, Elexon Kinnect, is the replacement of the BMRS with the [Insights Solution](#)¹¹ which will deliver a more visual, detailed and customisable data service for all users.

Beyond informing TIBCO users of the reason for decommissioning the TIBCO Service and the High Grade Service, recipients were also requested to join the BSC Modification process and feed back into this Modification to change the obligation to provide the BMRS data via the High Grade Service.

Desired outcomes

The desired outcome for this Modification is that it removes the obligations to provide BMRS data via the High Grade Service currently present within the BSC.

Removing the High Grade obligations within BSC will enable Elexon to phase out the TIBCO service and reduce the operational costs for all BSC Parties.

¹⁰ <https://www.elexon.co.uk/documents/industry-insights/data-flows/letter-to-tibco-users-on-decommissioning-the-tibco-service-and-high-grade-line-in-march-2024/>

¹¹ <https://bmrs.elexon.co.uk/>

Proposed solution

This Modification seeks to remove the obligations to provide BMRS data via the High Grade Service.

An initial view of the necessary changes to deliver the solution indicate that the proposed solution could amend Paragraph 2.3 'Grades of Service' of [Section V 'Reporting'](#) to achieve this goal, however it may be necessary to amend more areas of Section V, the wider BSC or its CSDs which will become clear over the course of assessment of this Modification.

Parties current using Elexon central systems data (i.e non-BMRS data) over the High Grade Service will be unaffected by this change.

Paragraph 2.3 of Section V states:

2.3.1 The BMRA shall make available the BMRS as follows:

(a) a High Grade Service, for which:

- (i) a Party (other than BSCCo) is required to pay the relevant Specified BSC Charges in accordance with Section D,
- (ii) any other person (other than the Authority) shall be required to make payments as provided in paragraph 2.3.4(a)

shall be made available to any Party and (subject to paragraph 2.3.4) any other person, on request; and

Elexon note that references to TIBCO are also present [in Section D - Annex D 'Specified BSC Charges'](#)¹², but do not propose to amend these references as they will need to remain in place to allow these charges to be recovered until TIBCO is fully decommissioned (currently planned in March 2024). After that point the rules will become redundant, with no further impact and so can be removed as part of a future housekeeping modification.

This is a facilitating change that would not directly retire TIBCO or directly lead to its replacement and therefore the impact on the code and market participants of such a change is minimal.

However, Elexon recognise that the changes this Modification facilitate are much more significant and as such, believe these "Second Order" impacts and benefits should be factored in to Workgroup discussions and captured as part of work on this Modification, so that TIBCO users and the wider industry are able to feed back their requirements and ensure they are comfortable with any potential next steps regarding provision of this information in the future, as described in further detail in Section 4 'Areas for Consideration' of this document.

Benefits

The primary benefit of this Modification is to align the Code with the reality that TIBCO is not a viable solution for new Trading Parties or third parties interested in BMRS data.

¹² <https://bscdocs.elexon.co.uk/bsc/bsc-section-d-bsc-cost-recovery-and-participation-charges>

Wider work to retire and replace TIBCO has significant benefits - replacing a service that is used by a minority of BSC Parties (that is nevertheless funded by all BSC Parties) and, in practice, unavailable for anyone wishing to onboard the service with a modern, user-friendly and reliable service which is free for its users.

These wider benefits will be assessed and considered by the Workgroup during the course of assessment of this Modification.

Applicable BSC Objectives

The Panel are invited to agree that this Modification will better facilitate Applicable BSC Objective (d) 'Promoting efficiency in the implementation of the balancing and settlement arrangements' as it is expected to:

- promote provision of BMRS data to industry in the most efficient way. The status quo - continuing to support a legacy system, with increasing costs and a small user base - is not economically efficient given modern low cost alternatives. Nor is it operationally efficient, as the maintenance and change of the TIBCO service is high compared to alternative methods as is the on-boarding process.

As a second order impact, this Modification could better facilitate Applicable BSC Objective (c) as it enables further work to allow easier access to real time BMRS data, allowing more parties to better compete within the electricity industry.

Implementation approach

Given that this Modification is likely to be a document-only change to the BSC that has little immediate impact on market participants, it may be suitable for implementation 5 Working Days after an Authority decision. This approach will be considered and verified by the industry Workgroup.



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

337/03

Removal of BSC obligations to provide BMRS Data via TIBCO and the High Grade Service
Initial Written Assessment

13 April 2023

Version 1.0

Page 11 of 19

4 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 of this Modification. 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.

Further considerations on potential retirement of TIBCO

While this Modification will not directly implement a replacement service to TIBCO (removal of the obligations merely facilitates this in the future), Elexon recognise that the Workgroup will likely only be comfortable with removing the obligations upon demonstration that Elexon's proposed alternative solution, the IRIS solution, at a minimum fulfils the provision of data to the same standards as TIBCO but ideally offers improvements in the following areas:

- Reductions in cost to industry;
- Reductions in cost to user;
- Scalability improvements;
- Message durability improvements;
- Latency improvements; and
- Uptime improvements.

The Issue 95 group also helped to clarify some requirements that they would want to be demonstrated prior to any 'switching off' of the TIBCO service, which Elexon intend to directly address as part of this Modification's assessment – making use of the opportunity to ensure that industry are comfortable with any potential next steps following approval of this Modification.

Issue 95 Feedback – Requirements

Speed and reliability in any future solutions. Issue Group members reported that parties want information as fast as possible, and need a reliable service that pushes data to them, so that their internal systems can read the information and use it to populate systems used for commercial decision-making.

Ensuring a method of providing data that is as resilient and as fast as current methods at the very least, but ideally more robust and faster.

Need for appropriate notice, parallel testing and crossover periods prior to retirement.

As noted in Section 2, Elexon has written to TIBCO users to encourage them to engage with this Modification and its Workgroup process. Any additional feedback received in this manner will be discussed as part of the Workgroup.

As desired by the Issue 95 group and BSC Panel ([334/04](#)¹³) in consideration of the Issue 95 Report, Elexon intend to present additional financial information to better clarify the

¹³ <https://www.elexon.co.uk/meeting/bsc-panel-334/>

scale of cost savings that can be achieved by replacing the TIBCO service with the IRIS solution.

Areas to consider

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

Areas to Consider
Are the Workgroup comfortable with the removal of BSC obligations to provide BMRS Data via TIBCO and the High Grade Service?
Should this Modification be approved, is it appropriate for Elexon to retire the TIBCO service? If so, what criteria should be met first?
How will this Modification impact the BSC Settlement Risks?
How will this Modification impact the consumer benefits?
What changes are needed to BSC documents, systems and processes to support this Modification and what are the related costs and lead times? When will any required changes to subsidiary documents be developed and consulted on?
Are there any Alternative Modifications?
Should this Modification be progressed as a Self-Governance Modification?
Does this Modification better facilitate the Applicable BSC Objectives than the current baseline?
Does this Modification impact the EBGL provisions held within the BSC, and if so, what is the impact on the EBGL Objectives?

337/03

Removal of BSC
obligations to provide
BMRS Data via TIBCO and
the High Grade Service
Initial Written Assessment

13 April 2023

Version 1.0

Page 13 of 19

5 Proposed Progression

Next steps

The Panel are invited to raise this Modification Proposal in accordance with [BSC Section F 'Modification Procedures'](#)¹⁴ paragraph 2.1.1(d)(i) – as we believe it better facilitates Applicable BSC Objective (d) – 'efficiency in the implementation and operation of the BSC'.

Given the need to assess the impacts and options with industry, we recommend the Modification should be assessed by a Workgroup and submitted to the Assessment Procedure.

The Panel are also invited to nominate a Proposer's representative to represent them in the Workgroup. We recommend the Elexon Product Owner for BMRS as the Panel's representative. In this case, the Workgroup will effectively own the solution and all decisions will require a majority vote as per the provisions in section F. Alternatively, the Panel may wish to nominate a Panel Member to be the Proposer Representative.

Despite a lack of direct impacts expected to result from this enabling, document-only change, Elexon's initial view is that this Modification should not be considered suitable for Self Governance decision on the basis that it removes an obligation from the BSC and therefore impacts the governance arrangements (Self-Governance criterion (a)(v)), so therefore think it sensible that Ofgem as the Authority make the decision to approve or reject this proposal.

Workgroup membership

The assessment of this Modification Proposal requires knowledge in:

- TIBCO and High Grade Service operations and processes;
- BMRA arrangements;
- BMRS reporting.

Additionally, we particularly welcome representation from industry members who participated in Issue 95 and existing TIBCO users, [who Elexon wrote to in March 2023](#) to advise them of this Modification and encourage engagement with this workstream.

Timetable

Proposed Progression Timetable	
Event	Date
Present Initial Written Assessment to Panel	13 April 2023
Workgroup Meeting	W/C 2 May 2023
Workgroup Meeting	W/C 19 June 2023
Assessment Procedure Consultation (15 WDs)	7 August– 29 August 2023
Workgroup Meeting	W/C 11 September 2023
Present Assessment Report to Panel	12 October 2023



What are the Self-Governance Criteria?

A Modification that, if implemented:

- (a) does not involve any amendments whether in whole or in part to the EBGL Article 18 terms and conditions; except to the extent required to correct an error in the EBGL Article 18 terms and conditions or as a result of a factual change, including but not limited to:
 - (i) correcting minor typographical errors;
 - (ii) correcting formatting and consistency errors, such as paragraph numbering; or
 - (iii) updating out of date references to other documents or paragraphs;
- (b) 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

Removal of BSC obligations to provide BMRS Data via TIBCO and the High Grade Service Initial Written Assessment

13 April 2023

Version 1.0

Page 14 of 19

¹⁴ <https://bscdocs.elexon.co.uk/bsc/bsc-section-f-modification-procedures>

Proposed Progression Timetable	
Event	Date
Report Phase Consultation (10 WDs)	16 October – 27 October 2023
Present Draft Modification Report to Panel	9 November 2023
Issue Final Modification Report to Authority	15 November 2023
Development of subsidiary documents	During Assessment and implementation – to be determined by the Workgroup

337/03

Removal of BSC obligations to provide BMRS Data via TIBCO and the High Grade Service Initial Written Assessment

13 April 2023

Version 1.0

Page 15 of 19

6 Likely Impacts and costs

This Modification is expected to be an enabling, document-only, change that is not expected to have any direct impact on the operation of BSC, its Parties or Systems.

However, the Modification is expected to facilitate future work as a second order effect that would impact on the BMRS, should BSCCo choose to go down this route.

Post-implementation impacts

As this Modification is a facilitating change, merely removing obligations for BSCCo to provide BMRA Data via the High Grade Line that would enable Elexon to implement a new solution at a later date, it is not directly expected to impact any BSC Parties. However, the further second order changes to the provision of TIBCO data that this change facilitates is expected to impact all current TIBCO users who will need to migrate to any new, replacement platform in order to receive the data that they currently receive. All types of BSC Parties are able to be TIBCO users, it is our understanding that remaining users are mainly Non Physical Traders and Generators.

Impacts & Costs

Impact on BSC Parties and Party Agents		
Party/Party Agent	Potential Impact	Potential cost
None anticipated on implementation	N/A	N/A

Impact on the NETSO	
Potential Impact	Potential cost
None anticipated	N/A

Impact on BSCCo		
Area of Elexon	Potential Impact	Potential cost
None anticipated	N/A	N/A
Impact on BSC Systems and processes		
BSC System/Process	Potential Impact	
N/A	None anticipated. This Modification is expected to be a document-only change	

Impact on BSC Settlement Risks	
None anticipated, this is an enabling change which is not expected to impact Settlement in any way. This assumption will be verified over the course of assessment of this Modification.	

337/03

Removal of BSC obligations to provide BMRS Data via TIBCO and the High Grade Service
Initial Written Assessment

13 April 2023

Version 1.0

Page 16 of 19

Impact on Code	
Code Section	Potential Impact
BSC Section V	Removal of obligations that require provision of High Grade Service and TIBCO.

Impact on EBGL Article 18 terms and conditions
None anticipated, however this assumption will be verified during the course of impact assessment during course of the Modification process

Impact on Code Subsidiary Documents	
CSD	Potential Impact
BSCP70 - CVA Qualification Testing for Parties and Party Agents	The assumption is that removal of high level obligations within Section V would be sufficient to achieve this Modification's goals, however the Workgroup will consider any further necessary changes to the BSC CSDs as part of their assessment.
Interface Definition Documents	

Impact on a Significant Code Review (SCR) or other significant industry change projects
We do not believe this Modification impacts any open SCR and have requested Ofgem to class this change as SCR-exempt.

Impact of the Modification on the environment and consumer benefit areas:	
Consumer benefit area	Identified impact
1) Improved safety and reliability No impact expected	Neutral
2) Lower bills than would otherwise be the case This change is expected to facilitate the introduction of a replacement for TIBCO as a method for receiving BMRS data. Any new replacement will be free to users and not require a license fee (unlike the status quo) which will reduce the costs that are ultimately borne by the end consumer. A reduction in customer bills could also come about as a result of more parties being able to access real time BMRS data facilitating transparency and consequently facilitate competition by providing accessible, accurate information for informed decision-making, fostering innovation, and ensuring a level playing field for all market participants.	Positive
3) Reduced environmental damage No impact expected	Neutral
4) Improved quality of service This change is expected to facilitate the introduction of a replacement for TIBCO as a method for receiving BMRS data. Any new replacement will be more seamless, efficient and effective than the current TIBCO set up and improve the quality of service for new and existing users	Positive
5) Benefits for society as a whole No impact expected	Neutral



What are the consumer benefit areas?

- 1) Will this change mean that the energy system can operate more safely and reliably now and in the future in a way that benefits end consumers?
- 2) Will this change lower consumers' bills by controlling, reducing, and optimising spend, for example on balancing and operating the system?
- 3) Will this proposal support:
 - i) new providers and technologies?
 - ii) a move to hydrogen or lower greenhouse gases?
 - iii) the journey toward statutory net-zero targets?
 - iv) decarbonisation?
- 4) Will this change improve the quality of service for some or all end consumers. Improved service quality ultimately benefits the end consumer due to interactions in the value chains across the industry being more seamless, efficient and effective.
- 5) Are there any other identified changes to society, such as jobs or the economy.

337/03

Removal of BSC obligations to provide BMRS Data via TIBCO and the High Grade Service
Initial Written Assessment

13 April 2023

Version 1.0

Page 18 of 19

7 Recommendations

We invite the Panel to:

- **RAISE** this Modification Proposal in accordance with Section F2.1.1(d)(i);
- **AGREE** that this 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.