

DCP 350 - CREATION OF EMBEDDED CAPACITY REGISTERSTo: **Richard Colwill**Email: DCUSA@electralink.co.ukDue Date: **27 February 2020**

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Response ¹ :	Non-confidential

1. Are you comfortable with the proposed amendments to the intent statement of this change?

We agree with creating regional registers but to aid industry users further, there is merit in holding the data all in one place, even if in separate files or as an absolute minimum having a central website page such as Balancing Mechanism Reporting System (BMRS) which then has a link to each separate register.

There is likely to be an exponential increase in data being provided to Industry and therefore there is a real danger of fragmentation with regional registers located on separate websites. The amended intent is a pragmatic start but as noted a central location is the optimum solution for the following reasons;

- Industry Users can locate all the data/registers in one place. A User may be interested in knowing about assets near Milton Keynes for example. The user may therefore need to locate the regional registers on the following websites, Western Power Distribution, UK Power Networks and Scottish and Southern.
- The NETSO would be interested in all the regional registers.
- If or when the location of these registers changes, within each owners website this may prove frustrating for Industry Users
- Reduces fragmentation

Further questions arise over whether each DNO has a separate register for its licensed area or will each amalgamate each licensed area into one file for the Company i.e. will WPD have one register for the four of its licensed areas?

There is also merit in including IDNO's which connect into a licence area in a DNO register if they ultimately affect the available headroom of a nearby substation, or if a

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new participant for example wishes to gauge competition for Balancing Services within a GSP/GSP Group or a DSO seeking flex.

2. Do you understand the intent of the CP?

Yes. As we move to a more decentralised system, information provision is crucial to allow the various Industry Parties to make more informed decisions thus resulting in a reduction in costs be it reinforcement or balancing.

3. Are you supportive of the principles that support this CP, which is to increase the availability of accessible data which is expected to improve the economic and efficient and operation of the energy market, while driving towards a lower carbon economy?

Yes. It aligns with the Open Data policy.

4. Do you agree with the data items that the Working Group have decided should be included in an ECR? If not, what items would you remove/add and why?

Balancing and Settlement Code (BSC) Modification Proposal P399 is currently being progressed through our change process. P399 seeks to provide an extra level of data to Industry Parties with regards to Non Balancing Mechanism trades.

Currently the trading party is anonymous. The proposed new data items are, a counterparty ID, location and technology type. The MPAN data item could potentially act as the Counterparty ID in the Balancing Services Adjustment Data file (when not provided through an aggregator). If there are going to be numerous new sources of data made available to Industry it's crucial that there is a way of linking the data i.e. through a common data item, rather than having lots of duplicate data sources which slightly contradict each other.

If the MPAN was not provided as a data item, as a minimum there should be a unique ID for the site. The NETSO could then choose to adopt that code/MPAN as a Counterparty ID. This would negate the need for the 'Providing Services' data items for the TO as Industry Parties would be able to see whether a site is providing Balancing Services through other data sources.

We recommend therefore progressing P399 as a way of deriving whether an Asset is providing a Balancing Service to the TO as opposed to the proposed data item in DCP350.

Is there merit in aligning the data item 'resource' with 'fuel type' which is used elsewhere in Industry? There are benefits in having consistency amongst different data sets used in Industry, when reporting.

BSC Modification Proposal P375, which is also being progressed through the BSC change process, is intending to allow Asset Meters to be used in Settlement. These will

be given a unique code similar to a MPAN/MSID. This may be better suited to a future change but at one stage we can envisage AMSID being used within this register. When registering Asset Meters we have requested similar information to be provided as what's in this register. This may allow assets <1MW or behind the meter to be included

In terms of other data items, consideration should also be made of Grid Code Modification GC0139: Enhanced Planning-Data Exchange to Facilitate Whole System Planning

5. Do you have any comments on the definitions that have been used for each item proposed to be contained in the ECR?

In technology type does the data item need to be as prescriptive as suggested or is there more merit in grouping technologies based on common characteristics i.e. Fast Acting? These registers need to be created and then maintained so consideration over whether the extra level of granularity is actually required will reduce costs and may lead to less 'data not available' or blank cells.

6. Do you agree with the format chosen by the Working Group for publishing the ECR?

Yes

7. Do you agree with the proposal that each DNO and IDNO is to publish a populated version of the common ECR on their individual website? Please provide rationale.

As a minimum and a pragmatic start yes, but the locations (url) of each other's registers should be stored in one location with responsibility on each DNO/IDNO to make sure this is up to date when inevitable website changes occur. Two obvious locations are the BMRS website, which provides information on Balancing services and operation of the System, or ESO's website where the TEC and embedded registers are kept.

8. Do you believe that the publication of a national register by a third party in the future would be of most use to all market participants? If so, in what timeframe would you like to see this in place by?

Managing updates to a central file, from numerous different parties does require careful thought and management therefore added costs and timescales. What is of more importance than a single register, is ensuring that all the registers are contained in one, or accessible from one location, they are version controlled, new or changed

data items can easily be identified, and all the registers look identical. This could be achieved in far quicker timescales than one national register. This is a new option in between, one single National Register and Individual Registers located on the DNO/IDNO's website.

DNO's and IDNO's are signatories to the BSC so could be obligated through a concurrent BSC modification to send the required data/registers to ELEXON, as a neutral, independent and not for profit third party and then for ELEXON to publish these on BMRS. This will not alter the progress of this modification as the actual data requirements for the registers could be contained in DCUSA and the obligation to send to a central location such as BMRS contained within the BSC. Through modification P399 information on Non BM Trades could be linked to these registers through the MPAN with co-ordination with the NETSO. Through BSC Modification Proposals P375 and P395, new asset metering systems will be created and could become a data item within the register.

9. Do you agree with the proposal to mandate that the ECR is to be updated on a monthly basis on a set date?

Yes as a minimum but more regular updates should not be precluded.

When thinking about the set date it will be useful to consider what the data will be used for, by whom and any key Industry dates, such as Capacity Mechanism auctions, Balancing Services tender rounds, network charges etc. If this informs Parties of likely competition, you wouldn't want to see significant changes to the register just after a key date.

10. Do you believe that the governance arrangements proposed by the Working Group as to how the ECR is populated will lead to DNOs and IDNOs updating it in a consistent manner?

Yes, we agree with the governance arrangements. It is crucial that the registers look exactly the same. When designing the registers, if the order of the columns could also be identical that would be useful when amalgamating data. Legal text requires the data items to be provided but does not require this to be in the same format or order? It doesn't preclude extra data items which although can be welcome can cause problems. When considering a national register or at least a single location for the registers, changes could be made to the BSC, which would put obligations on all the relevant Parties as they are signatories to the BSC,

11. Do you agree with the Working Group's proposed mechanism to deal with future amendments to the structure of the ECR?

Yes

12. Do you believe that the Working Group has sufficiently covered off concerns related to data privacy regulations and potentially commercially sensitive information, specifically given the range of benefits as described in sections 1 and 3? And if not, then what else do you consider that Working Group needs to do?

Yes. This seems consistent with legal advice we have received for BSC Modification Proposal P399. We also note that DNO's are already voluntarily publishing this data.

13. Do you consider that DCP 350 better facilitates the DCUSA General Objectives? If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons. If not, please provide supporting reasons.

Yes but as noted, a central location for these registers would be a more optimum solution

14. Are you supportive of the proposed implementation date being 10 Working Days following Authority approval?

If the existing data is available yes; but the providers of the data are better placed to answer. Will the first register be required to be published 10 days after approval or is this when the legal text becomes live and the actual publication of the registers is a month afterwards?

15. Do you have any comments on the draft legal text for DCP 350?

They are obligations to publish the data, but are there obligations to publish all new data items as well as requirements to ensure the accuracy of the data published. To meet the obligations, could Parties just publish a new version each month with no changes?