Stage 03: Assessment Consultation

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

P291 'REMIT Inside Information Reporting Platform for GB Electricity'

The Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT) is an EU regulation aimed at preventing market abuse in wholesale energy markets. A key requirement is for market participants to publish inside information.

P291 proposes to use the Balancing Mechanism Reporting System (BMRS) as a platform to publish the necessary information to meet the requirements of REMIT inside information reporting for the GB electricity sector.

This Assessment Consultation for P291 closes:

5pm on **Tuesday 21 May 2013**

The Workgroup may not be able to consider late responses.

The P291 Workgroup:
- Initially recommends **Approval** of P291

High Impact:
- Balancing Mechanism Reporting Agent (BMRA)
- Transmission Company

Medium Impact:
- BSC Parties

Low Impact:
- ELEXON

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About this Document

The purpose of this P291 Assessment Consultation is to invite BSC Parties and other interested parties to provide their views on the merits of P291. The P291 Workgroup will then discuss the consultation responses, before making a recommendation to the BSC Panel at its meeting on 13 June 2013 on whether or not to approve P291.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits/drawbacks and proposed implementation approach. It also summarises the Workgroup's key views on the areas set by the Panel in its Terms of Reference.
- Attachment A contains the draft redlined changes to the BSC for P291.
- Attachment B contains the specific questions on which the Workgroup seeks your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish the Workgroup to consider.

Further Information

More information is available in:

Attachment **A**: Draft Legal Text

Attachment **B**: Assessment Consultation Questions

For further information, please see the P291 page of the ELEXON website.

Any questions?

Contact:
David Kemp

david.kemp@elexon.co.uk

020 7380 4303

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1 Summary

Why Change?

The Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT) requires market participants to publish information that, were it not to be published, would be considered inside information. The guidance on REMIT from the Agency for the Co-operation of Energy Regulators (ACER) expresses a preference for this information to be published on central reporting platforms.

Solution

P291 proposes to introduce a REMIT inside information reporting platform to the Balancing Mechanism Reporting System (BMRS) website. Participants will be able to submit messages to this platform through existing Grid Code submissions (in relation to outages, PN and MEL/MIL re-declarations), modified to include additional information, or through the ELEXON Portal, provided they have the necessary authorisation.

The Workgroup is also considering a possible alternative solution which would only allow messages to be submitted via the ELEXON Portal, and is seeking further industry views to enable a full comparison with the Workgroup's preferred solution.

Impacts & Costs

P291 impacts the BSC and the Balancing Mechanism Reporting Agent (BMRA) Service Description and User Requirement Specification. It will also require changes to the Grid Code.

It will impact the BMRA, the Transmission Company and ELEXON, and is likely to impact most BSC Parties. However, use of the P291 REMIT platform by Parties, and therefore the associated implementation impacts, would not be mandatory under the BSC.

The central implementation cost of P291 is approximately £475k, comprising £105k in BMRA costs, £20k in ELEXON effort and £350k in Transmission Company costs. Individual Party costs identified by the P291 Industry Impact Assessment range from minimal up to £500k. As part of this consultation the Workgroup wishes to clarify and confirm industry costs and impacts, now that the Workgroup has a preferred solution.

Implementation

P291 is proposed for implementation on 26 February 2015 (February 2015 BSC Systems Release), depending on when the Authority's decision is received.

Workgroup's Recommendation

The Workgroup initially unanimously believes that P291 would better facilitate Applicable BSC Objectives (c) and (e), and therefore initially recommends that P291 is approved.

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2 Why Change?

What is REMIT?

The Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT) is an EU regulation (regulation (EU) No 1227/2011)[1] that came into force on 28 December 2011 and is aimed at preventing market abuse in the wholesale energy markets. It establishes a new framework for the monitoring of wholesale energy markets. A key requirement of this framework is for market participants to publish information that, were it not to be published, would be considered inside information.

The Agency for the Co-operation of Energy Regulators (ACER) recently published the second edition of its non-binding guidance on REMIT[2] which includes details on the reporting of information that would otherwise be considered inside information. This guidance states that inside information should be disclosed in a manner ensuring that it is capable of being "disseminated to as wide a public as possible", and suggests that market participants with potential inside information should use centralised platforms for disclosing their information if such platforms exist, although they can also use their own websites. The guidance considers that the use of a transparency platform will decrease the organisational burden on market participants, and that the use of such platforms would allow information to be more accessible to all market participants.

What information is required to be reported under REMIT?

The REMIT regulation does not explicitly set out what should or should not be reported under the regulation. Article 2(1) of the regulation sets out the definition of 'inside information' as:

- Information of a precise nature which has not been made public, which relates, directly or indirectly, to one or more wholesale energy products and which, if it were made public, would be likely to significantly affect the prices of those wholesale energy products.

The REMIT regulation further defines 'information' as:

- Information relating to the capacity and use of facilities for production, storage, consumption or transmission of electricity or natural gas or related to the capacity and use of LNG facilities, including planned or unplanned availability of these facilities; and
- Information which is required to be disclosed in accordance with legal or regulatory provisions at Union or national level, market rules, contracts or customs on the relevant wholesale energy market, in so far as this information is likely to have a significant effect on the prices of wholesale energy products; and
- Other information that a reasonable market participant would be likely to use as part of the basis of its decision to enter into a transaction relating to, or to issue an order to trade in, a wholesale energy product.

REMIT has been in force since December 2011 with market participants publishing information on a number of individual websites. Generator outage data seems to feature significantly on market participants' existing publications.

[1] http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:326:0001:0016:EN:PDF
[2] http://www.acer.europa.eu/remit/Pages/ACER_guidance.aspx

What is the issue?

A requirement of REMIT is for participants to publish any inside information. The ACER guidance advocates the use of reporting platforms for this.

What is inside information?

Article 2(1) of REMIT defines "inside information" as:

- Information of a precise nature;
- Which has not been made public;
- Which relates, directly or indirectly, to one or more wholesale energy products; and
- Which if it were made public, would be likely to significantly affect the price of those wholesale energy products.

ACER's guidance contains further information on what it currently considers to be covered by the above criteria.

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What is the BMRS?

The Balancing Mechanism Reporting Service (BMRS) is a service for publishing and reporting data relating to the Balancing Mechanism, Settlement and the market in general. This includes data provided by National Grid relating to balancing actions and indicative data relating to balancing and settlement, including indicative data for each Settlement Period shortly after its completion. All of the data published on the BMRS is indicative data, calculated from the information available at the time, and is not used within Settlement, but its publication helps to facilitate the operation of the GB electricity market. Market participants can choose to receive the information via a 'high-grade' service, where the information is sent to them directly via a TIBCO feed, or they can use the 'low-grade' service, the BMRS website[3]. The low-grade service is freely available to anyone.

In a similar fashion to the data currently published on the BMRS, inside information required under REMIT would not be used in Settlement, but would help to facilitate the operation of the market. In addition, its publication would enable the industry to align with the most recent ACER guidance, which expresses a preference for using central reporting platforms to publish potential inside information in a place freely accessible to anyone.

What problem does P291 identify with the current arrangements?

National Grid has recently launched a REMIT transparency platform for the GB gas market[4], but there is currently no such platform in place for the GB electricity market. The Proposer considers that the BMRS would be the most suitable place for a platform.

The BMRS has grown and evolved into an electricity data reporting tool, even where the data is not directly used in Settlement. This combined with ACER's preference to use existing industry reporting platforms for publication of potential REMIT inside information makes the BMRS a logical reporting mechanism for displaying the required information. Activities of the Balancing Mechanism Reporting Agent (BMRA) and functionality of the BMRS are specified under the BSC. Therefore, in order to allow REMIT inside information to be published on the BMRS website the BSC must be amended accordingly.

The BSC Modification process will provide a path by which to define the platform requirements as well as ensuring the platform meets the REMIT requirements and ACER guidance. This will include aligning with the guidance on what should be published on the platform and how the platform should operate.

In the absence of a central inside information reporting platform, BSC Parties (and other participants within the electricity industry) have to comply with the REMIT requirements by reporting potential inside information on their own websites (or by other reporting channels, for example social media) which makes it difficult to locate all the published information. Publishing potential inside information reported by market participants on a single platform will make it easier to locate. Furthermore, this will also align GB practices with the most recent version of the non-binding ACER guidance on REMIT, which expresses a preference for reporting potential inside information on central platforms where these exist.

Modification Proposal Form

A copy of the Proposer's Modification Proposal Form can be found on the P291 page of the ELEXON website.

[3] http://www.bmreports.com/
[4] https://www.remit.gb.net/

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Proposed solution

P291 proposes to amend the BSC to allow a REMIT inside information reporting platform to be introduced on to the BMRS website. This will enable the publication of necessary information for market participants to meet the requirements of REMIT inside information reporting for the GB electricity market, as well as establishing expected standards and methods for the input and reporting of such data. Code changes will be required to obligate the BMRA to provide the service and set out who can submit data, how they will do so, and how it will be reported.

REMIT data reported on the BMRS will not be used in Settlement, but reporting the information in this way will help facilitate the wholesale electricity trading market by providing near to real-time reporting and historic market information.

When developing its solution to P291, the Workgroup has considered the Nord Pool Spot reporting platform[5] to be a good example to follow. This platform has also been highlighted within the ACER guidance as the best example to follow. Many of the requirements for the proposed BMRS platform were subsequently based on this platform.

The P291 proposed solution will introduce two routes through which participants with inside information will be able to submit their messages; through existing but modified flows under the Grid Code (in relation to outages) and/or through the ELEXON Portal. In both cases, the messages will be published on the BMRS website for all participants to view. Participants will not be mandated under the BSC to use the BMRS reporting platform and can elect to continue to use their own websites instead or in parallel should they choose.

Submission via the Grid Code

Participants who submit information to the Transmission Company under the Grid Code[6] will be able to include their inside information messages via the following flows:

- The submission of generator outage information that participants are required to make to the Transmission Company under Section OC2 'Operational Planning and Data Provision' of the Grid Code; and
- The submission of short term Physical Notification (PN) and Maximum Export/Import Limit (MEL/MIL) re-declarations (not captured under OC2 data) that participants are required to make to the Transmission Company under Sections BC1 'Pre Gate Closure Process' and BC2 'Post Gate Closure Process' of the Grid Code.

The relevant flows will be expanded as part of P291 to include the extra fields required for the additional information that will be needed for these messages (such as the cause of the outage or the expected duration).

It should be noted that only participants who are required to submit the above information through the Grid Code (generators and Interconnector owners) would be able to make use of this method. In addition, this route would only cater for messages relating to outages.

What is the proposed solution?

P291 proposes to introduce a REMIT inside information reporting platform to the BMRS website.

Participants will be able to submit messages through the ELEXON Portal or through existing Grid Code submissions.

The Workgroup is also considering a possible alternative solution which would only allow messages to be submitted via the ELEXON Portal.

[5] http://www.nordpoolspot.com/Message-center-container/UMM-List/

[6] You can find further information in the relevant sections of the Grid Code, which are available at: http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/gridcodedocs/

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Other participants that are not subject to the Grid Code, and so do not have the systems in place to make Grid Code submissions, or any participant that wishes to submit REMIT information not covered by the Grid Code messages, would need to use the ELEXON Portal to submit information for publication on the BMRS REMIT reporting platform.

Submission via the ELEXON Portal

Under P291 participants may also submit information for publication on the REMIT platform via the ELEXON Portal. Participants may choose to submit information via the Portal because:

- They cannot submit via the Grid Code (because they are not subject to the Grid Code and do not have the necessary systems);
- They choose not to submit REMIT information through the Grid Code (e.g. for commercial or technical reasons);
- They wish to submit REMIT information not covered by the Grid Code submission method (i.e. not relating to outage information); or
- They wish to submit further information relating to a REMIT submission initially made via the Grid Code (e.g. to provide clarification or an update on the situation).

Submission of REMIT information via the Portal would be made by participants entering messages through an 'online form' on the ELEXON Portal. Participants would be required to log in to their account in order to access the reporting areas. Category A Authorised Signatories under BSC Procedure (BSCP) 38 'Authorisations' will automatically be able to report information for all 'assets' (such as BM Units) belonging to the Party IDs for which they are a Category A signatory. They will also be able to delegate authority to report against these assets to other participants as required. An equivalent process will be put in place for the authorisation of REMIT information submission by non-BSC Parties who have assets that they need to report against.

For the avoidance of doubt, under P291 participants would be able to submit REMIT information via both the Grid Code and ELEXON Portal routes, provided that they are subject to, and have the necessary systems for, the Grid Code, and have the necessary Portal authorisation.

Legal text

The proposed redlined changes to the BSC to deliver the proposed solution to P291 can be found in Attachment A.

Assessment Consultation Question
Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of P291? *Please provide your rationale.*
The Workgroup invites you to give your views using the response form in Attachment B

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What information would participants need to submit?

Article 4(1) of REMIT states that disclosures "shall include information relevant to the capacity and use of facilities for production, storage, consumption or transmission of electricity … including planned or unplanned unavailability of these facilities". The ACER guidance considers that the following pieces of information should be included in any publication that Parties issue on inside information:

- The caption "Publication according to Article 4(1) of REMIT / UMM – Urgent Market Message";
- A subject heading that summarises the main content of the publication;
- The name and contact information of the market participant;
- If applicable, the name and location of the respective asset;
- If applicable, the balancing area or market area concerned;
- The time and date of the relevant occurrence, including e.g. the (estimated) duration of outages;
- The time and date of publication;
- If applicable, the reasons for the unavailability of generation units, consumption units or parts of the electricity or gas grid; and
- If applicable, a history of prior publications regarding the same event e.g. if a prognosis is updated or an unplanned outage becomes a planned outage.

The Workgroup has considered this list when developing its solution, to ensure that all of these points have been captured where possible. As part of its considerations, it has based the list of required data on that displayed in messages published on Nord Pool Spot's reporting platform. The list of data items for P291 includes two data items (the cause of the event in question and the expected duration) which are not listed under the ACER guidance on REMIT but will be required under the forthcoming Transparency regulation (see below). Please see Appendix 1 for a full list of the proposed data items.

How does P291 relate to the forthcoming Transparency regulation?

P291 has been raised in response to the REMIT regulation, seeking to put in place a central platform that meets the requirements of this regulation. However, much of the information that is captured by REMIT in relation to outages will also be captured under the forthcoming Transparency regulation, although outage information will only be a subset of the data required under the Transparency regulation. It is currently anticipated that the Transparency regulation will come into force in June 2013, and that the central information transparency platform arising from this will need to be operational 18 months later, towards the end of 2014.

Article 2(1) of REMIT states that inside information includes any information that participants are required make public under EU Regulation 714/2009[7]. The Transparency regulation will amend Annex I of this regulation, and therefore any information that is

[7] http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0015:0035:EN:PDF

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required to be made public through the Transparency regulation could subsequently fall under REMIT too.

The Transparency regulation, its implementation into the GB arrangements, and any interaction with the BSC will be considered separately to P291. However, the P291 Workgroup has considered that it would be prudent to accommodate the relevant requirements of the Transparency regulation in relation to outage information as much as possible in the P291 solution. This will mean that only a minor change would be required to the P291 solution as part of any future Modification relating to the Transparency regulation, such as the introduction of a flag to indicate that the REMIT message should also be treated as a Transparency message.

Workgroup members have therefore agreed that the P291 solution should be developed in order to meet the defect identified by this Modification (i.e. that a central platform for reporting the information required under the REMIT regulation should be developed). They have noted that that the wider requirements of the Transparency regulation is out of scope of P291, and that this will be considered and addressed separately. However, the Workgroup believes that the P291 solution should accommodate the relevant information that will be required under the Transparency regulation where possible, where this is known, as the Transparency regulation requires only a couple of additional items of information beyond that captured in ACER's guidance document. P291 is currently scheduled to be sent to the Authority for decision in mid-July 2013, and the Workgroup considers that the Authority would be able to take a more holistic view when making its decision.

Are there any potential alternative solutions for P291?

The Workgroup were unanimous in agreeing that the inside information should ultimately be published on the BMRS website. However, the Workgroup began by considering the method by which participants would submit their messages to the reporting platform. The Workgroup put forward three possible routes:

- **Via the ELEXON Portal**: This method would make use of the existing login functionality of the ELEXON Portal. Participants would log in to their Portal accounts and would be able to submit information from there. Portal accounts are free for any participant to create, irrespective of whether they are a BSC Party or not.
- **Via the BMRS website**: This method would be equivalent to the ELEXON Portal route, except that participants would log in to the BMRS website. However, that functionality does not currently exist on the BMRS website, and so would need to be created and developed as part of P291 if this route was chosen, increasing costs accordingly.
- **Via existing Grid Code submissions**: This method would make use of the existing submission of OC2, PN and MIL/MEL data to the Transmission Company, which would be linked to a vast majority of potential messages. The relevant Grid Code flows would be expanded to cater for the additional information required for the BMRS messages. The Transmission Company would then forward this information on to the BMRS website once it had been received.

It was also considered that the Transmission Company could create functionality akin to the Portal/BMRS routes. However, this solution was dismissed following impact assessment, as it would be more expensive than the other routes, and was deemed

What solutions did the Workgroup consider?

The Workgroup's Industry Impact Assessment contained six possible solutions for submitting messages to the BMRS reporting platform:

A: Portal only
B: BMRS only
C: Grid Code only
D: Grid Code and Portal
E: Grid Code and BMRS
F: Grid Code and Transmission Company functionality akin to Portal/BMRS routes

The proposed solution to P291 is Solution D from this Impact Assessment. The Workgroup's potential alternative is Solution A.

The detailed requirements for each solution can be found in the Industry Impact Assessment document, which is available on the P291 page of the ELEXON website.

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inefficient because it would require new functionality to be developed that would simply duplicate functionality that already exists in the ELEXON Portal.

The Workgroup also considered a wholly Transmission Company based solution, where the Transmission Company would both receive and publish the messages. However, this solution could not be taken forward under P291 as it would not have a BSC impact.

Some members of the Workgroup considered that the Grid Code route could not be taken forward as a standalone solution, as it would exclude non-Grid Code participants from being able to submit messages, and would not cater for REMIT messages that did not relate to outages. They therefore considered that the Grid Code submission route should only be taken forward as part of a 'hybrid solution' in parallel with either the ELEXON Portal or BMRS website route. The Workgroup subsequently agreed that the Grid Code-only solution should not be taken forward.

Workgroup members considered that the hybrid solutions would be the more pragmatic solutions to progress. These solutions would allow Grid Code participants to utilise the Grid Code submission route to submit their outage messages, which would be more efficient for them, but would also allow a route both for non-Grid Code participants to submit messages and for both Grid Code and non-Grid Code participants to submit non-outage related REMIT messages. However, the Workgroup also considered that a solely web-based solution (Portal or BMRS website only), as well as being cheaper and simpler, would allow the Authority to implement a solution to P291 sooner, as the lead times for those solutions are shorter than those for the hybrid solutions (please see Section 5 for more information on the lead times).

Following impact assessment, the Workgroup noted that the central costs of implementing the solutions involving the ELEXON Portal would be cheaper than those involving the BMRS website. One Workgroup member queried the reliability of the ELEXON Portal, noting that those solutions would have a greater risk of failure due to involving two separate websites and the passing of information from the Portal to the BMRS website. It was noted that the historic actual availability of the Portal since its introduction in February 2012 has been 99.99%, well above the required SLAs for the site[8], and so can be deemed to be highly reliable. It was also highlighted that the BMRS website solutions would make use of some of the existing Portal infrastructure, rather than developing everything from scratch.

Following these discussions, the Workgroup expressed a preference for taking forward the Portal routes for message submission over the BMRS website routes and, taking into account the benefits for Grid Code participants of including a Grid Code submission route, therefore agreed that the hybrid solution allowing both Grid Code and ELEXON Portal submissions should be taken forward as the proposed solution to P291.

Some Workgroup members consider that it might be best for the Portal-only solution to also be put forward to the Authority for decision, as it would be a simpler, highly adaptable solution with lower development and maintenance costs and a quicker implementation lead time. The Authority would then be able to decide between the two solutions when making its decision. The Workgroup therefore seeks your views on this possible alternative solution, using Portal-only submissions, as part of its Assessment Consultation.

Further information on the Workgroup's wider discussions on the solutions can be found in Section 6.

[8] The SLAs for the availability of the ELEXON Portal are 99.7% within working hours and 99.0% outside of working hours.

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Industry Impact Assessment respondents' views on alternative solutions

Respondents to the P291 Industry Impact Assessment were split in their views as to which of the solutions the Workgroup had considered should be taken forward. A majority of respondents were in favour of a hybrid solution, as it would allow Grid Code participants to utilise those flows for submitting messages, while still allowing a web-based approach for other participants or for REMIT messages unrelated to outages. However, there was no clear consensus as to which of those solutions would be best.

A couple of respondents noted that the Portal-only or BMRS-only solutions would offer the Industry the greatest value and would be the simplest and most cost-effective solutions, as long as the automated data submission elements were present. There was a view that allowing multiple submission methods could run the risk of duplicating messages, conflicting notifications or errors. These participants felt that a Portal-only or BMRS-only solution would mean that participants would modify any systems or front-end interfaces used to submit data to the Grid Code to also submit the same data to the Portal-only or BMRS-only solution at the same time. However, other respondents believed that the solely web-based solutions would themselves be inefficient, if these modifications were not possible for either technical or cost reasons, as participants would be required to follow-up their notifications to the Transmission Company under the Grid Code with a separate message to the BMRS website, resulting in a need to submit the same information twice.

The majority of respondents believed that the Workgroup had considered all the possible options for P291, and that there were no other possible alternative solutions.

One respondent commented that a large number of participants are likely to continue to report information on their own websites, and so considered the possibility of the BMRS 'pulling' data from participants' websites, rather than participants needing to 'push' the information. The Workgroup noted that both the proposed solution and the possible Portal-only solution would have the ability for participants to automatically submit data to the BMRS. Participants would be required to make the relevant changes to their systems to achieve this, but it would be possible for participants to submit any information to both the BMRS and their own websites, through either the ELEXON Portal or the Grid Code route, through a single submission.

Another respondent thought that some changes could be made to existing Grid Code requirements in order to "knit together" the shorter-term Electronic Dispatch Logging (EDL) flows with the longer-term OC2 data, removing the cross-over at around two days out when OC2 data ceases to be required and the EDL submissions take over. However, this is something that the Transmission Company would need to consider as part of the corresponding changes under the Grid Code.

You can find the full responses to the Industry Impact Assessment on the P291 page of the ELEXON website.

Industry Impact Assessment

The full responses made by Parties to the Industry Impact Assessment can be found on the P291 page of the ELEXON website.

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Assessment Consultation Questions
Do you believe that the Portal-only solution would be better than the Workgroup's preferred solution, which allows both Portal and Grid Code submission? *Please provide your rationale.*
Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P291 which would better facilitate the Applicable BSC Objectives? *Please provide your rationale and, if 'No', please provide full details of your Alternative Modification(s) and your rationale as to why it/they better facilitate the Applicable BSC Objectives.*
The Workgroup invites you to give your views using the response form in Attachment B

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Estimated central implementation costs of P291

The total central implementation cost for P291 is approximately £475k. This comprises:

- Approx. £105k in BMRA effort;
- Approx. £20k (90 man days) in ELEXON effort; and
- Approx. £350k in Transmission Company costs.

The BMRA costs are for updating the ELEXON Portal to allow participants to submit messages (including via an automated data feed), updating the BMRS website to include the platform where messages will be published, and amending systems to receive messages submitted via the Transmission Company. The ELEXON effort is required to update the relevant documents for P291 and to oversee the implementation project.

P291 will also require the Transmission Company to update its systems (in particular the Transmission Outage and Generator Availability (TOGA) and Electricity Balancing System (EBS) systems) to receive messages and subsequently forward them to the BMRS website, and to update the Grid Code accordingly. You can find the Transmission Company Analysis for P291 on the P291 page of the ELEXON website.

Estimated costs for the Portal-only solution

The total central implementation cost for the Portal-only solution would be approximately £115k. This would comprise:

- Approx. £95k in BMRA effort; and
- Approx. £20k (80 man days) in ELEXON effort.

The BMRA costs are for updating the ELEXON Portal to allow participants to submit messages (including via an automated data feed) and updating the BMRS website to include the platform where messages will be published. The ELEXON effort is required to update the relevant documents for P291 and to oversee the implementation project. There would be no impact on the Transmission Company for this solution.

Indicative Industry costs of P291

Respondents to the P291 Industry Impact Assessment have indicated costs ranging from minimal up to £500k for implementing P291, although a majority of costs have been estimated at £100k or less. In their responses, respondents noted that impacts would include system, documentation and process changes and the corresponding training. It was also expected that updates would be needed to the systems that interact with the Transmission Company if changes were made to the submissions made under the Grid Code. Other systems would also need to be updated to realise any automated data submission elements of the solutions.

The Workgroup seeks to clarify the impacts and costs of P291 on Parties now that the solution has been narrowed down, as several respondents to the Industry Impact Assessment had indicated that they could not provide detailed information at that stage. It therefore asks respondents to the Assessment Consultation to confirm the impacts and

Industry Impact Assessment

The full responses made by Parties to the Industry Impact Assessment can be found on the P291 page of the ELEXON website.

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costs they will incur, both for the proposed solution and for the Portal-only solution discussed in Section 3.

Assessment Consultation Questions
Please indicate, for both the proposed solution and the potential Portal-only solution, the impacts of the relevant solution on your organisation. *Please provide your rationale.*
Please indicate, for both the proposed solution and the potential Portal-only solution, whether the cost you would incur in implementing the relevant solution would be: • Less than £100k; • At least £100k but less than £300k; or • £300k or more. *Please provide your rationale including, if you wish, a more precise value for your anticipated costs.*
The Workgroup invites you to give your views using the response form in Attachment B

P291 impacts

Impact on BSC Systems and process	
BSC System/Process	Impact
BMRA	The BMRA will be responsible for receiving inside information and publishing that information on the BMRS.
BMRS	The BMRS will be updated to include an inside information reporting platform and a list of historic messages stored as daily .csv format files.

Impact on BSC Parties and Party Agents
BSC Parties (and other market participants) will be able to publish inside information to, and obtain this information from, a central reporting platform following implementation. Parties may also wish to align or develop automated data submission processes in line with the solution requirements should they wish, although this is optional. BSC Parties who submit information to the Transmission Company under the Grid Code may be required to amend their systems to account for changes to the relevant flows under the proposed solution.

Impact on Transmission Company
Under the proposed solution the Transmission Company will be required to receive inside information from participants as part of notifications under the Grid Code, and will be required to submit this information to the BMRS website. No impact is anticipated under the possible alternative, Portal-only, solution.

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Impact on ELEXON	
Area of ELEXON	Impact
Release Management	ELEXON will manage the implementation project.
ELEXON Portal	The ELEXON Portal will be amended to allow participants to submit their inside information via the Portal. ELEXON would also be required to approve 'pseudo Category A' participants for non-BSC Parties wishing to submit messages.

Impact on Code	
Code Section	Impact
Section Q	Changes will be required to implement the proposed solution. The proposed changes can be found in Attachment A.
Section V	

Impact on Code Subsidiary Documents	
CSD	Impact
BMRA Service Description	Changes will be required to implement the proposed solution.

Impact on Core Industry Documents and other documents	
Document	Impact
Grid Code	Changes will be required to implement the proposed solution.

Impact on other Configurable Items	
Configurable Item	Impact
BMRA User Requirements Specification	Changes will be required to implement the proposed solution.

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5 Implementation

Recommended Implementation Date

The Workgroup initially recommends an Implementation Date for P291 of:

- 26 February 2015 (February 2015 BSC Systems Release) if the Authority's decision is received on or before 29 May 2014; or
- 25 June 2015 (June 2015 BSC Systems Release) if the Authority's decision is received after 29 May 2014 but on or before 25 September 2014.

The lead time is driven by the lead time required by the Transmission Company to amend its systems. The lead times for the remaining central changes and those indicated by all respondents to the Industry Impact Assessment would all be shorter than this.

The Transmission Company has also indicated that it could not implement P291 any earlier than the February 2015 BSC Systems Release. It is currently in the process of implementing its new Electricity Balancing System (EBS), which will replace its existing Balancing Mechanism systems, and which is due to be completed in late 2013. Following this, there will be a change freeze period in order to allow for a period of stability and for any launch issues to be resolved. Further changes to EBS (including those required for P291) could not be started until around mid-2014, meaning that February 2015 is the earliest available Release that the Transmission Company considers it could achieve for P291.

The Workgroup is keen to implement P291 before the end of 2014, in order to have the platform in place before the reporting requirements of the Transparency regulation come into effect. It has therefore asked the Transmission Company to consider whether it could implement P291 in the November 2014 BSC Systems Release (6 November 2014) or, failing that, a Standalone Release between then and the end of 2014.

Implementation Date for the Portal-only solution

The lead time for the Portal-only would be driven by the lead time required to make the changes to the ELEXON Portal and the BMRS website. It would not impact the Transmission Company and so would not be impacted by the changes to EBS noted above. Subsequently, this solution could be implemented as part of the June 2014 BSC Systems Release (26 June 2014, if an Authority decision was received by 14 November 2013). All but one of the participants who responded to the Industry Impact Assessment indicated that their required lead time for this solution would be shorter than that required for the central changes.

Assessment Consultation Question
Do you agree with the Workgroup's recommended Implementation Date? *Please provide your rationale.*
The Workgroup invites you to give your views using the response form in Attachment B

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What is the most appropriate route for submitting messages?

The Workgroup discussed the best approach for allowing participants to submit messages to the reporting platform. The Authority representative informed the Workgroup that the requirements they considered important for the solution were that it: needed to comply with the REMIT regulation; needed to be accessible to all market participants; needed to provide all the information required; and should be free or not too expensive to submit messages.

Recommendation

The Workgroup initially unanimously recommends approval of P291.

Submission through a web-based approach

The Workgroup began by considering the use of the ELEXON Portal as a route to submit messages. The Portal already contains a lot of the functionality that would be required for this solution, such as login functionality, and would also be cheaper and easier to develop than it would be to create a system from scratch, such as would be required to build this functionality into the BMRS website itself. Some Workgroup members were keen to explore a BMRS-only approach, believing that it would be more efficient to keep everything on a single website. However, it was noted that the central costs of this approach were notably more than those for the ELEXON Portal approach.

Some Workgroup members highlighted that a web-based approach would be inefficient for a lot of Parties, as it would require them to make an additional submission above what they would already need to submit. For example, if a generation unit suffers a failure, the generator is already required to make appropriate submissions to the Transmission Company to inform them of this. Requiring them to make a further submission to report this on a central platform would be an additional manual step that the generator would need to do, taking time that they would prefer to use to try to assess and resolve the situation. The Workgroup were keen that any web-based method would need to be capable of being automated; otherwise there would be a risk that Parties would elect to continue to use their own websites and not the BMRS platform.

Several Workgroup members noted that it would not be that difficult for them to amend the systems and/or front-end interfaces that they use currently, either to submit information to the Transmission Company or to their own websites, to also simultaneously submit a second message on to the BMRS website. It was thought that the costs to an individual Party to achieve this would vary depending on their systems.

One Workgroup member queried the reliability of the ELEXON Portal over the BMRS website. They noted that needing to submit messages through the Portal meant that you had not only the risk of the BMRS website being unavailable but also the Portal being unavailable, or a failure of the link between them. A BMRS-only approach would reduce the risk of unavailability accordingly, which could justify the increased costs. However, it was noted that the ELEXON Portal has been available 99.99% of the time since its launch, far exceeding its service level agreements, and making it extremely reliable. The Workgroup accepted that the difference in the risk of unavailability would therefore be negligible between the two approaches.

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Submissions under the Grid Code

One Workgroup member suggested that the submissions made by Parties to the Transmission Company under the Grid Code could be used. A significant majority of events that would likely to be classed as inside information would be reported through the Grid Code currently, such as planned outages through OC2 data or an unplanned outage through a MEL/MIL re-declaration. Submitting information through this route would protect the integrity of the data, due to the security and backup procedures already in place, and would also prevent Parties from having to report an event twice (i.e. making the Grid Code submission then needing to post a message via a web-based approach). The information currently submitted through the Grid Code would need to be expanded to provide all the information needed under REMIT. However, once that had been completed, all a participant would need to do is include the relevant extra information in its submissions to the Transmission Company, rather than make a second, completely separate, submission via a different route. Several other members of the Workgroup also supported this approach.

Hybrid solutions – submissions via both approaches

It was highlighted that not every industry participant is able to submit information via the Grid Code. While generator outages will form the vast majority of likely messages, there will be other types of REMIT messages being reported from other market participants, which this route would not cater for. Although it would be possible to amend the Grid Code to allow other participants to submit information this way, these participants would also need to set up the relevant communication systems required to submit the information to the Transmission Company, and the cost of this could be significant for a small market participant. It was felt that an alternative route would be required for these participants, via a web interface. However, one Workgroup member cautioned against having multiple submission routes, as that could lead to confusion.

Several Workgroup members could not see a reason why a non-Grid Code participant would be in a position where they would need to submit information under REMIT. They noted that the threshold for needing to submit information is 100MW, and stations of this size should fall under the Grid Code. The Authority representative informed the Workgroup that they had received numerous queries from participants with large demand portfolios who were not sure whether they would be required to report inside information under REMIT. At this stage, it is difficult to say whether they would be required to or not, and it was stressed that the solution should cater for these participants just in case. It was also highlighted that network outages and related issues would also need to be reported, as these too would have an impact on prices. The ability to submit messages should also be open and accessible to everyone as a means of future-proofing the solution, as it is hard to say what may happen over the next few years, and who else may subsequently be impacted by REMIT. The Workgroup elected to seek further information on the potential impact of REMIT on participants on the supply side of the market as part of the Assessment Consultation.

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Assessment Consultation Question
How do you believe REMIT will impact on the supply side of the market, and what messages (if any) do you anticipate these participants would need to submit? *Please provide your rationale.*
The Workgroup invites you to give your views using the response form in Attachment B

It was noted that the Grid Code route would also be limited to only being able to report outage-related information, and that if market participants had information that was unrelated to an outage, they would need an alternative route to submit such information. It was therefore agreed that the Grid Code route would need to be implemented in parallel with a web-based route, as a 'hybrid' approach. However, participants would have the option of only using one of the two routes on offer should they wish, rather than both.

One member of the Workgroup noted that a hybrid solution would be a pragmatic approach as it would cater for all participants. Participants that are required to submit via the Grid Code would be able to submit any accompanying REMIT messages to the BMRS at the same time as making their submission to the Transmission Company, while other participants would have access to a free web-based solution. In addition, Grid Code participants would also have a choice of whether to use the Grid Code approach or the web-based approach to submit their messages. The Workgroup elected to seek the views of respondents to the Assessment Consultation on whether they would find the web-based or the Grid Code approach easier to use, and which one they would likely use.

Assessment Consultation Question
Would you find the web-based approach or the Grid Code approach easier to use to submit messages to the BMRS reporting platform? *Please provide your rationale, taking into account both the implementation costs and effort for system/process changes and the on-going effort in submitting messages.*
The Workgroup invites you to give your views using the response form in Attachment B

One Workgroup member commented that there would need to be a way to link together submissions made through the two separate approaches, should a hybrid approach be taken. For example, a generator may initially report an unplanned outage through the corresponding MEL re-declaration under the Grid Code, but may wish to update that message later, for example to update the cause or expected duration or report the conclusion of the outage, through the web-based approach. It was agreed that this would be included in the solution to any hybrid approach. The Transmission Company representative also noted that any participant using the Grid Code approach would be able to submit updates through that route should they wish, rather than having to switch to the web-based approach. It was agreed that both options should be available.

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Should the solution be mandatory or voluntary?

The Workgroup considered whether the P291 solution should be made mandatory for participants. Participants are obligated under the REMIT regulation to report any inside information, but it is not mandatory for them to use a central platform for this, and they can use their own websites should they so wish. Although the ACER guidance expresses a preference for the use of centralised reporting platforms, this does not oblige participants to do so.

The responsibility for reporting inside information falls on the participant, as do the liabilities associated with any failure to report information. One Workgroup member highlighted that the obligation to report information would not be removed just because a central platform was unavailable. The Workgroup believes that participants would likely continue to use their own websites as backup even if they did use a central reporting platform. This would mean that if the central platform was unavailable, a participant could still report the information on its own website and thus could subsequently trade on that information.

The Workgroup also discussed the issue of liability for the use of the platform. It was noted that the BMRS reporting platform would display disclaimers informing participants that the BMRA would not accept liability should the BMRS reporting platform be unavailable, nor would it accept liability for the accuracy of any information that was published on the platform.

It was highlighted that it is not just BSC Parties that are required to publish inside information, as the obligations of REMIT fall on all market participants. However, it is not possible for the BSC to place obligations on non-BSC Parties, such as large consumers who are embedded within a Supplier BM Unit, in which situation the BSC requirements would fall on the Supplier. One Workgroup member noted that BSC Parties would bear all the central costs of implementing P291, but that non-BSC Parties would also be able to benefit from its implementation. Another Workgroup member agreed that this may not initially appear be fair, but noted that BSC Parties would realise ancillary benefits from non-BSC Parties submitting their information to the central platform.

It was suggested that non-BSC Parties could be charged for submitting messages to the BMRS platform. However, it was believed that this may deter these participants from using the platform, which would be detrimental to the solution. One of the key benefits arising from having a central reporting platform is that all messages from all participants could be available in a single location; if participants were deterred from using the platform, its value would be reduced.

In light of these reasons, the Workgroup agreed that the P291 solution would not be mandatory on BSC Parties.

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Would P291 require changes to the Transmission Licence?

The Workgroup was asked to consider whether P291 would require a change to the Transmission Licence before it could be implemented, as the information that P291 was seeking to add to the BMRS website is not related to nor would have an impact on Settlement, and is therefore not a part of the BSC. The Workgroup noted that the BMRS website already reports information that is not related to Settlement, such as information related to the Large Combustion Plant Directive (LCPD) that was introduced by Approved Modification P226 'Improving Large Combustion Plant Directive Information Disclosure'. In light of that, Workgroup members agreed that P291 should be considered as an evolution of the data currently reported on the BMRS website.

The Transmission Company's view is that P291 would not impact the Transmission Licence, and that P291 is within the scope of the Balancing and Settlement activities provided for in the Transmission Licence, which are to facilitate the Applicable BSC Objectives, as stated in Standard Licence Condition C3.3. It considers that the REMIT regulations are concerned with trading, in that information only needs to be reported if it would have an impact on trading prices, and notes that the Balancing and Settlement arrangements are fundamentally linked to trading. A provisional view was sought from the Authority, which agrees at this time with the Transmission Company's view and rationale that a change to the Licence would not be required.

One Workgroup member queried why the Workgroup had been asked to consider this issue, and was not sure what it would need to consider in order to answer this question. They believe that it is not in the scope of a Modification Workgroup to consider this area, and that this is an issue that should be resolved between the Transmission Company and the Authority. They therefore believe that this is not an appropriate question to be put to a Modification Workgroup.

What impact would the Transparency regulation have?

The Workgroup considered how the forthcoming Transparency regulation may interact with P291. It was noted that the Transparency regulation is itself outside of the scope of P291, and will be considered separately, but it was also noted that some of the information that will be required under the Transparency regulation overlaps with information required under the REMIT regulation. The Workgroup therefore deemed it prudent to take into account the relevant requirements under the Transparency regulation when developing the P291 solution.

One Workgroup member noted that there are only two pieces of information required under the Transparency regulation, in relation to outages, which aren't covered by the REMIT regulation or noted in ACER's guidance. These are the cause of the relevant event and the expected duration. Both of these items had already been considered for inclusion as part of the P291 Draft Solution document, and it was agreed that it would be sensible to retain these items within the solution going forward.

It was highlighted that the introduction of the Transparency regulation could make the use of central reporting platforms mandatory. The REMIT requirements do not currently mandate the use of central reporting platforms, and the ACER guidance only states a preference for their use, and therefore the P291 solution will not be mandatory on BSC Parties. However, ENTSO-E has indicated the possibility that reporting to the new Electricity Market Fundamental Information Platform (EMFIP), which would report the data submitted under the Transparency regulation, would be performed by no more than three

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national platforms per member state, rather than individual participants submitting their information directly to the platform. This would suggest that participants would be required to submit their inside information to a central platform at a future date. However, the Workgroup agreed that this should be left until such a requirement comes into force, and that P291 should continue to propose that the central REMIT reporting platform be voluntary.

There was concern that the solution selected for P291 could end up being incompatible with any wider solution implemented in response to the Transparency regulation. Workgroup members were keen to ensure that the solution implemented for P291 would be compatible with any Transparency regulation solution developed separately. It was noted that the Transparency regulation work would have visibility of the progression of P291, and could take its solution into account.

What would be deemed to be inside information?

The Workgroup debated what could be deemed to be inside information. One Workgroup member noted that inside information had to be precise and definite data or information. If the event in question was only a possibility then that would not constitute inside information at that time, and so would not need to be reported.

One Workgroup member highlighted the example of a generator discussing a potential planned outage with the Transmission Company, and wondered at what point these discussions would be deemed inside information and would have to be declared before either party could trade. In particular, they cited future arrangements where the Transmission Company could veto a generator's planned outage. This could imply that the Transmission Company could be deemed to hold inside information, as they had the final power of decision, and so could not trade until that information was made public. Conversely, as the generator will not know for sure when the planned outage will take place until the Transmission Company makes its confirmation, it could trade on the assumption that the planned outage will occur at the time it requested without needing to make that information public, as the event would not yet be definite. Another Workgroup member queried at what point a Party would be required to report this information, for example whether it would need to be published during discussions or after final confirmation had been received.

The Workgroup agreed that it is important to know what would need to be reported under the REMIT regulation, but that this was not an issue for P291, which merely seeks to provide a platform for any such messages to be published on.

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What are the Workgroup's views against the Applicable BSC Objectives?

The Workgroup unanimously believes that P291 would better facilitate the achievement of:

- **Applicable BSC Objective (c)**, as publishing wholesale inside information on a public platform will ensure that this information is freely accessible to all Parties, which would better enable effective competition. Although non-BSC Parties would be able to benefit from P291 without having to contribute towards the costs, the Workgroup feels that this would be outweighed by the ancillary benefits arising from BSC Parties being able to see messages from non-BSC Parties on the platform; and
- **Applicable BSC Objective (e)**, as, although the ACER guidance is not legally binding, this Modification Proposal would align with the spirit of this objective. It would also better facilitate Parties' compliance with the relevant REMIT regulations.

The Workgroup therefore initially unanimously recommends that P291 is approved.

Assessment Consultation Question
Do you agree with the Workgroup's initial unanimous view that P291 does better facilitate the Applicable BSC Objectives than the current baseline? *Please provide your rationale with reference to the Applicable BSC Objectives.*
The Workgroup invites you to give your views using the response form in Attachment C

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]

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Appendix 1: Message Data Items

Data items for inclusion in messages

The Workgroup has considered that the following data items should be included in messages submitted to the BMRS reporting platform:

Message Data Items	
Data Item	**Description**
Message Summary	
Message Heading*	Provides a one-sentence summary of the event. Can be automatically generated or can be freely entered (free entry only available via the web-based approach).
Event Type*	Describes the type of event covered by this message. Select from 'Planned Outage', 'Failure' or 'Special Information' The selection will determine some other fields in the table. Definitions will be provided for each Event Type.
Published	Automatically populated when the message is submitted for publication on the BMRS.
Asset Details	
Asset*	Drop-down list containing a list of the assets that the participant is eligible to report on. Category A signatories will automatically have access to all relevant assets, and they will be able to delegate these assets to other participants to report on. Asset list will be generated based on the Transmission Company's list of assets used within the Balancing Mechanism. Participants can manually register assets not recorded with the Transmission Company. The option 'No Asset' will be available for use if the participant has general information that doesn't relate to a specific asset.
Asset Type	Automatically populated based on asset information. Select from 'Generation', 'Demand', 'Transmission' or 'Distribution'.
[Affected Unit]	Automatically populated based on asset information. Depends on type of asset being reported on (e.g. BM Unit, Transmission Line etc.).
Participant ID	Automatically populated based on asset information. Relevant BSC Party ID will be used. Field will be left blank for non-BSC Parties. A Participant Name field may be used as well/instead.
Affected Area	Automatically populated based on asset information. Currently proposing using the BMRS Zones.
Type of Fuel	Automatically populated based on asset information.
Normal Capacity (MW)	Automatically populated based on asset information.

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Message Data Items	
Data Item	**Description**
Event Details	
Available Capacity (MW)†	Number field manually filled in by participant.
Event Start†	Time the event started/will start.
Event End†	Time the event ended/is expected to end.
Duration Uncertainty†	Describes the level of uncertainty in the expected duration.
Cause†	Describes the cause of the event List to be determined, but will include 'Unknown/Under Investigation'. Definitions will be provided for each Cause.
Event Status†	Describes the current status of the event. Select from 'Open' (default option) 'Closed' or Cancelled (other types may be added). Definitions will be provided for each Event Status.
Related Information	
Related Information	Free text field where the participant can add any further information they feel necessary.

* denotes mandatory field.

† denotes mandatory field if 'Event Type' is 'Planned Outage' or 'Failure' but optional if 'Special Information'.

Any non-mandatory fields left blank by the participant will not be shown on the published message.

More details can be found in the Workgroup's Draft Solution issued as part of its Industry Impact Assessment, which is available on the P291 page of the ELEXON website.

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Appendix 2: Workgroup Details

Workgroup's Terms of Reference

Specific areas set by the BSC Panel in the P291 Terms of Reference
What information would participants need to include in their disclosures?
What are the system requirements for the reporting platform? As part of this, the Workgroup should consider: • How participants would submit their information to the BMRS; and • How the information would be reported through the BMRS.
Should reporting on this platform be mandatory or voluntary?
What liability issues would there be if the BMRS was unavailable? What other potential liability issues may there be?
Is there any relationship between P291 and the forthcoming Transparency Regulation?
What changes are needed to BSC documents, systems and processes to support P291 and what are the related costs and lead times?
Would changes be required to the Transmission Licence for P291?
Does P291 better facilitate the Applicable BSC Objectives than the current baseline?

Assessment Procedure timetable

P291 Assessment Timetable	
Event	Date
Panel submits P291 to Assessment Procedure	14 Feb 13
Workgroup Meeting 1	25 Feb 13
Workgroup Meeting 2	14 Mar 13
Industry Impact Assessment	21 Mar 13 – 12 Apr 13
Workgroup Meeting 3	19 Apr 13
Assessment Procedure Consultation	29 Apr 13 – 21 May 13
Workgroup Meeting 4	30 May 13
Panel considers Workgroup's Assessment Report	13 Jun 13

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Workgroup membership and attendance

P291 Workgroup Attendance				
Name	Organisation	25 Feb 13	14 Mar 13	19 Apr 13
Members				
Dean Riddell	ELEXON *(Chair)*	✓	✓	✓
David Kemp	ELEXON *(Lead Analyst)*	✓	✓	✓
Andy Colley	SSE *(Proposer)*	✓	✓	✗
Garth Graham	SSE *(Proposer's Representative)*	✗	✗	✓
Phil Hewitt	EnAppSys	✓	☎	✗
Esther Sutton	E.ON	✗	☎	✓
Man Kwong Liu	IBM	✓	✗	✓
Cem Suleyman	Drax	✓	✓	✓
Bill Reed	RWE Supply & Trading	✓	✗	✗
Lisa Waters	Waters Wye Associates	✗	✗	✗
Tariq Hakeem	National Grid	✓	✓	✓
Sarah Owen	Centrica	✓	✗	✓
Simon Piercy	Congito	✓	✓	✗
Richard Hall	Consumer Focus	✗	✗	✗
Colin Prestwich	SmartestEnergy	✗	✗	✗
Martin Mate	EDF	✗	✓	☎
Attendees				
Zaahir Ghanty	ELEXON *(Design Authority)*	✓	✓	✓
Tina Wirth	ELEXON *(Lead Lawyer)*	✓	✓	✓
Talia Addy	ELEXON	✓	✓	✓
Clémence Marcelis	Ofgem	✗	✓	✓

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