

Assessment Consultation Responses: P291 'REMIT Inside Information Reporting Platform for GB Electricity'

Consultation issued on 29 April 2013

We received responses from the following Parties

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
TMA Data Management Ltd	0 / 1	Party Agent
SSE plc	11 / 0	Supplier / Generator / Trader / Consolidator / Distributor
Drax Power Limited	1 / 0	Generator
Eggborough Power Limited	1 / 0	Generator
RWE Supply & Trading GmbH	10 / 0	Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent
IBM UK Ltd for and on behalf of the ScottishPower Group	7 / 0	Supplier / Generator / Trader / Consolidator / Exemptable Generator / Distributor
National Grid	1 / 0	Transmission Company
SmartestEnergy	1 / 0	Supplier / Consolidator / Trader
Centrica	13 / 0	Generator / Trader / Supplier / BSC party
E.ON UK	5 / 0	Supplier / Generator / Trader / Consolidator / Exemptable Generator
EDF Energy (late response)	10 / 0	Generator / Supplier / Party Agent / Consolidator / Exemptable Generator / Trader

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Question 1: Do you agree with the Workgroup’s initial unanimous view that P291 does better facilitate the Applicable BSC Objectives than the current baseline?

Summary

Yes	No	Neutral/No Comment
11	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	Applicable objective 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] will be better facilitated by modification P291 as it would help Parties comply with the ACER guidance and the REMIT obligations.
SSE plc	Yes	For the reasons we set out in the Proposal.
Drax Power Limited	Yes	We agree with the unanimous view of the Workgroup that P291 would better facilitate the achievement of: <ul style="list-style-type: none"> • Applicable BSC Objective (c), as publishing wholesale inside information on a public platform will ensure that this information is freely accessible to all market participants. This platform would benefit BSC Parties and non-BSC Parties (small participants and new entrants) alike, thereby better enabling effective competition in the GB power market; and • Applicable BSC Objective (e), as, although the ACER guidance is not legally binding, this Modification Proposal would align with the spirit of its objectives. It would also better facilitate Parties’ compliance with the relevant REMIT regulations.
Eggborough Power Limited	Yes	It will improve the functioning of the market by providing access to data given under REMIT on a single platform that is already widely used by the market.
RWE Supply & Trading GmbH	Yes	We support the conclusions of the workgroup that P291 will better meet the relevant BSC objectives. In particular we believe that a suitably robust central system will help to facilitate implementation of REMIT and enhance competition through the availability of

Respondent	Response	Rationale
		consistent and REMIT compliant industry information on a central platform.
IBM UK Ltd for and on behalf of the ScottishPower Group	Yes	<p>ScottishPower agrees with the arguments that P291 would better facilitate the Applicable BSC Objective (c) and (e) in that:-</p> <ul style="list-style-type: none"> • Publishing REMIT information on a public platform will ensure that this information is freely and easily accessible to all Parties, which would better enable effective competition; and • It is consistent with the requirements of European Regulation on Energy Market Information Transparency (REMIT) and better facilitates Parties' compliance with the relevant REMIT regulations.
National Grid	Yes	<p>We believe P291 better facilitates BSC applicable objective (c). The publishing of REMIT information on a central platform better facilitates effective competition and hence objective (c).</p> <p>ACERs non-binding guidance on REMIT 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. However, this guidance is not binding and hence technically cannot be said to better facilitate objective (e).</p>
SmartestEnergy	Yes	The proposal is in the interests of efficiency for the whole industry
Centrica	Yes	By having a central platform containing all relevant inside information will assist the competitive nature of the electricity market thus meeting relevant objective (c). Additionally, ACER has expressed a preference for the use of central platforms for the disclosure of this information. ACER may make this mandatory in future, thus we believe that introducing a central reporting platform also better facilitates relevant objective (e).
E.ON UK	Yes	P291 should help to achieve Applicable Objective (d), promoting effective competition, by ensuring that inside information is published on a central public platform accessible to all Parties. Although Parties would bear the cost but non-BSC Parties would also benefit from the provision of this platform, we agree that this funding discrepancy should be outweighed by

Respondent	Response	Rationale
		<p>the advantage of all market participants being able to access the data from such a single platform.</p> <p>Applicable Objective (e) would also be supported as implementing a central reporting platform for GB would be in line with ACER's REMIT guidance of 28/09/12, para 6.2.</p>
EDF Energy (late response)	Yes	<p>While it is difficult to demonstrate benefits explicitly against BSC objectives, although they may exist as described below, we think the proposal is a pragmatic approach to adapt the existing market reporting platform under the BSC for wider use. We support the development of central platforms, and think the costs are likely to be less than the total cost across the industry of developing a brand new system. Shared across all BSC Parties, the central costs do not appear excessive, and there is flexibility for us to manage our own costs for using the proposed functionality, with no requirement to change Grid Code interfaces if we choose not to.</p> <p>However, note that we think the suggested alternative proposal to use only the Elexon Portal to submit data is more likely to better meet BSC objectives, because it delivers similar benefits with lower cost and earlier delivery. The benefits are described below against BSC objectives (b) and (c), and earlier implementation would obviously increase them. Lower cost would give less detriment to BSC Objective (d).</p> <p>The system operator might be able to use additional information provided on the platform to operate the transmission system more efficiently and securely, better meeting BSC Objective (b), however we think that the information to do this is already provided by participants in accordance with the Grid Code.</p> <p>Increased transparency for participants should facilitate forward trading to better balance positions, which might also better facilitate BSC Objective (b), but the extent of this is hard to quantify.</p> <p>There are potential benefits to competition in having a central GB platform to facilitate market transparency. This should better promote BSC objective (c) concerning competition, by allowing participants to allocate costs and risks between themselves more efficiently. However, the materiality of the benefit is hard to quantify, particularly as use of the platform would not be mandatory.</p> <p>Sharing of the development and possible operating</p>

Respondent	Response	Rationale
		<p>costs with participants that do not use or benefit from the platform would tend not to better meet BSC objective (c) concerning competition.</p> <p>The development and potential operating costs borne by all BSC Parties via BSCCo and NGET would not improve the efficiency of BSC administrative processes. This would not better meet the usual interpretation of BSC Objective (d). Nor would the costs borne directly by parties obviously improve BSC processes.</p> <p>However, there are potential efficiency benefits in modifying the existing GB BMRS platform for central GB reporting of REMIT data, rather than developing a new central platform. Similarly, there are potential benefits in modifying BMRS to act as a GB “marshalling” platform for future EU Data Transparency obligations.</p> <p>While the requirement for a central GB platform is not currently mandatory, and would not be mandatory if this proposal were approved, expenditure by BSCCo, NGET and parties on the proposal would not obviously allow BSC Objective (d) to be better met.</p> <p>EU Regulations do not currently mandate a GB central reporting platform, and even if they were to in future, it would not be obligated to be a platform created under the BSC, even though guidance may indicate a preference for existing platforms. Therefore BSC Objective (e) concerns EU regulations does not appear to be directly relevant.</p>

Question 2: Do you agree with the Workgroup that the draft legal text delivers the intention of P291?

Summary

Yes	No	Neutral/No Comment	Other
9	1	0	1

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	The draft legal text delivers the intention of P291.
SSE plc	No	<p>Having reviewed the draft legal text we note that Clause 11.2 relates to the submission of Inside Information and clause 11.2.1 states that "A BSC Party <i>may</i> submit Inside Information.....". Clauses 11.2.2 and 11.2.3 both state that the "BSC Party <i>shall</i>.....".</p> <p>We are concerned that this could be interpreted as being a mandatory obligation. This, in our view, would be inappropriate.</p>
Drax Power Limited	Yes	We believe it does.
Eggborough Power Limited	Yes	Eggborough did wonder if it would be better to make the definition of the data (insider information) be more loosely defined to allow for future regulations to use the same data flows. Would it be useful to include under 1.2.1A (d) (iii) "or any other data required by regulation"?
RWE Supply & Trading GmbH	Yes	It is important that the definitions under Section Q1.2 are more closely aligned with the REMIT definitions. For example, as drafted the definition of Inside Information should be "Information" and wholesale electricity products need to be defined.
IBM UK Ltd for and on behalf of the ScottishPower Group	Yes	The draft legal text appears appropriate, though ScottishPower is concerned with the timescale of 5 minutes for NGET to send REMIT information to BMRS, as the intention should be immediate, as is the case with the other non- Grid Code options.
National Grid	Yes	<p>We believe clause 6.1.24 should be on a reasonable endeavour basis, i.e.</p> <p>No later than 5 minutes after receipt, the Transmission Company shall use reasonable</p>

Respondent	Response	Rationale
		endeavours to send to the BMRA any Inside Information notifications that it has received from Market Participants via the Grid Code.
SmartestEnergy	Yes	-
Centrica	Yes	-
E.ON UK	Yes	-
EDF Energy (late response)	Some amendments are required	<p>We have not subjected the text to formal legal review, but make the following comments:</p> <ol style="list-style-type: none"> Proposed Q1.2.1A contains definitions specific to section Q. We generally prefer definitions to be "global" across the BSC (eg. in Section X), and other industry codes where possible, to reduce the possibility of inconsistency, duplication or misunderstanding. At proposed section Q1.2.1(c) and (d), the legal text should refer directly to the underlying regulation from which it originates, for example: ""Inside Information" means information as defined in Article 2 of EU Regulation 1227/2011 on wholesale energy market integrity & transparency." In the regulation, the text in (d) is referred to only for the purpose of the definition of "Inside Information", and includes further description of what is meant by "information of a precise nature". If the regulation text is to be repeated here, it should use the same construction as in the regulation itself ("Information" defined only in the context of "Inside Information"). Proposed Q6.1.24: Participants will submit information individually at separate times. To reflect this, the clause should be in the singular. Also, data would be provided by methods set out at high level in the Grid Code (probably "electronic communication"), but actually described in detail in other documents (EDL seems to be the intention). "via the Grid Code" is an unusual way of describing this. We suggest replacing "No later than 5 minutes after receipt, the Transmission Company shall send to the BMRA any Inside Information notification that it has received from Market Participants via the Grid Code" with "No later than 5 minutes after receipt, the Transmission Company shall send to the BMRA any Inside Information notification that it has received from a Market

Respondent	Response	Rationale
		<p>Participant using methods set out in the Grid Code”.</p> <p>4. Proposed Q11.2.2 says “The BSC Party shall send to the Transmission Company or the BSCCo the Inside Information messages in the form and manner prescribed in Annex V-1 Table 1B of Section V.” However, Table 1B appears to relate to publishing of received data on BMRS (see also proposed V2.2.2B). It should be made clear that sending messages is not obligatory, but if they are sent they should be submitted in the form and manner set out either in the Grid Code or in the [BMRS Specification/Reporting Catalogue/relevant Communication Requirements Document?] as appropriate, both by BSC Parties and non-BSC Party users. We suggest: “Any Inside Information messages sent by a BSC Party (or by anyone submitting such messages) for publication on BMRS shall be submitted in accordance with the Grid Code or the BSC [BMRS Specificaion/Reporting Catalogue/relevant Communications Requirements Document?], as appropriate.” As we understand it, the information published on BMRS might include “standing data” for a participant (eg. contact details) that is not provided with each individual submission. Although this would be covered by reference to other more detailed documents, it could be described as follows: “A BSC Party (or anyone else) wishing to have “Inside Information” information published on BMRS must provide the information indicated in Annex V-1 Table 1B of Section V, either as standing data or within individual submissions, as described in the [BMRS Specification/Reporting Catalogue/relevant Communications Requirements Document?].”</p> <p>5. Proposed Q11.2.3 should be deleted, as it is not obligatory for participants to use BMRS as a publishing platform.</p> <p>6. Proposed Section V1.2.2(c) and (d) would not be necessary if the definitions were included in Section X as suggested at comment 1 above.</p> <p>7. Proposed Section V2.1.2(d) could be implied to require parties to publish Inside Information Data on BMRS, whereas it would be voluntary/optional to use this method. Also, as</p>

Respondent	Response	Rationale
		<p>for comment 1 above, we would prefer "Inside Information Data" to be defined globally in Section X, and to be the information submitted to be published on BMRS, not Inside Information generally. Suggest changing "data relating to the arrangements provided for or referred to in Section Q, provided by Market Participants in relation to their general obligation to publish Inside Information ("Inside Information Data")." to "Inside Information data which may be submitted by a BSC Party (or any other person) in accordance with Section Q for the purpose of reporting on BMRS ("Inside Information Data")."</p> <p>8. Proposed V2.3.3(d) could be more precisely stated as: "Inside Information Data will be published on BMRS within two minutes of being received from the Transmission Company or BSCCo."</p> <p>9. The timescale for transfer of Inside Information notifications received by the Transmission Company to the BMRA is specified in proposed Q6.1.24 as no later than 5 minutes (making a potential delay from submission to publication of 7 minutes). A minimum time should also be specified for notifications received via the Elexon (BSCCo) Portal to be transferred to the BMRA, and given the apparent close relationship between BSCCo, the portal and BMRA, it should be less than 5 minutes. We think a delay of no more than 1 minute should be expected.</p> <p>10. Annex V-1 Table 1B should include information that is additional information about an unavailability, for example text explaining uncertainty about return date. Suggest last but one row says "If applicable, the reason for the unavailability of generation units, consumption units or parts of electricity [networks?], or other information relevant to the magnitude and duration of that unavailability."</p> <p>11. Slightly different legal text would be required for the suggested alternative proposal to use only the Elexon Portal for participant data submission.</p> <p>12. The proposed solution refers to BSC Category A Authorised Signatories being able to submit data and to delegate authority for their 'assets', and</p>

Respondent	Response	Rationale
		<p>an equivalent process for non-BSC Parties (for example, page 7 and page 15 of the consultation document). However, this is not described in the legal text, and because it concerns the potential transfer of important activities between parties (and non-parties), it probably should.</p> <p>13. The legal text should make reference to the possibility of non-BSC Parties using the Portal submission functionality to report data on BMRS, and should provide protection for BSC Parties (who pay for and will be the main users of the functionality) by requiring BSCCo to set out terms, to be agreed by the BSC Panel, for submission of data by non-BSC Parties. These should aim to protect BSC parties from misuse or abuse of the system, from incurring excessive costs on behalf of non BSC-parties, and from any liability for publication of misleading data.</p>

Question 3: Do you agree with the Workgroup's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
7	3	0	1

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	-
SSE plc	Yes	The implementation date is appropriate.
Drax Power Limited	Yes	Similar to the Workgroup, we are keen to see the implementation of P291 before the end of 2014, in order to ensure the platform is in place before the reporting requirements of the Transparency Regulation come into effect. We therefore hope the Transmission Company will be in a position to modify their systems so as to allow the implementation P291 in the November 2014 BSC Systems Release (6 November 2014) or, failing that, a Standalone Release between 6 November 2014 and the end of 2014.
Eggborough Power Limited	No	Eggborough Power would like to see implementation earlier. We do not understand why the Transmission Company requires so long to implement this and we believe it is impeding competition by not achieving implementation earlier. We would like to see Ofgem explore with the TO whether there are ways for them to deliver a solution in a more timely manner. The EBS is taking a very long time to implement and a workaround may be possible and certainly needs considering.
RWE Supply & Trading GmbH	Yes	An appropriate lead time is required to develop suitably robust central systems.
IBM UK Ltd for and on behalf of the ScottishPower Group	Yes	ScottishPower believes that implementation should occur in Q4 2014 rather than February 2015. Otherwise, it would be too late for the EU Transparency Regulations deadline.
National Grid	No	There are many similarities between the REMIT requirements and Article 15 of the Transparency Regulation. For the solution involving National Grid we believe that the implementation of the REMIT solution

Respondent	Response	Rationale
		should be aligned with the delivery of the Transparency solution (currently the end of 2014). This alignment will allow any National Grid IT changes to be more efficiently implemented.
SmartestEnergy	Yes	-
Centrica	No	It would be preferable if the implementation date could be brought forward to enable compliance with the reporting requirements under the Transparency Regulation
E.ON UK	Yes	While ACER's Guidance is not legally binding, a central platform should be developed as soon as possible to minimize the length of time for which parties are 'for an interim period' publishing on their own website. The development time required for central development should allow sufficient time for the IT and process changes that we would need to set in place.
EDF Energy (late response)	-	<p>We can accommodate implementation on 26 February 2015 or 25 June 2015 with ease. However, we have concerns that other mandatory developments could interact over these timescales and render the "Grid Code" part of the solution, the part which requires these long timescales, inefficient. For example, BMRS reporting requirements arising from the forthcoming EU Data Transparency regulations, or potential changes to NGET operational interface data arising from EU Code development.</p> <p>A two-stage implementation, with portal-only submission and BMRS reporting first, and additional Grid-code submission later, could deliver most of the benefits of the proposal earlier.</p> <p>Implementation of an alternative solution using only the Elexon Portal as the data submission route could have an implementation date 26 Jun 2014, is less costly, and is the route we would be likely to use anyway.</p>

Question 4: 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?

Summary

Yes	No	Neutral/No Comment
3	8	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	The use of the BMRS website and the Elexon portal allows for existing submission to be used to fulfil the REMIT obligations and also complies with one of the REMIT guidelines to use central reporting platforms.
SSE plc	No	Of the two options noted, the portal and grid code route for submission would be better for consistency and timing as grid code data has to be submitted regardless of REMIT data.
Drax Power Limited	No	<p>We have a preference for the Workgroup's preferred solution. We believe that the Grid Code submission route is superior to the Portal submission route, being less risky from an IT systems perspective in terms of the number of systems with which we have to submit data to. However, we note that the Portal submission route is workable.</p> <p>There are two main trade-offs which need to be considered when evaluating the two options. These are the total cost of the solution and the maximisation of participation on the platform.</p> <p>Total cost</p> <p>Individual market participants' costs, as well as the centralised system cost, needs to be considered when evaluating the proposals, with a view to minimising the total cost.</p> <p>Maximising participation</p> <p>However, whilst accepting the importance of the cost of the solution, consideration must also be given to the benefits (principally in terms of fostering increased platform participation) that the chosen solution can provide, i.e. more costly solutions may provide</p>

Respondent	Response	Rationale
		<p>additional benefits which justify the additional cost. A judgement will need to be made on the relative merits of the different costs and benefits of the two solutions.</p> <p>We shall be better placed to provide a final evaluation of the merits of the different options once stakeholder responses to this consultation have been received and reviewed by the Workgroup.</p>
Eggborough Power Limited	No	<p>Eggborough Power has considerable concerns over the very existence of the Portal. The Portal does not have any robust governance process and can be altered by Elexon without consultation. Where parties already use systems to transfer the relevant data to Grid there is a greater risk of error in submitting it twice, so using only the Portal would be less efficient and robust for those parties. The data may also become out of sync if there is a system issue with one of the submission routes, which again gives a less robust solution.</p>
RWE Supply & Trading GmbH	No	<p>Our preference is for a Grid Code based solution as this is the most robust source of consistent information. Grid Code submission should, therefore, be the primary source of data to fulfil the requirements of REMIT and of the Transparency Regulation. However we recognise that certain users may wish to submit information via the Portal and we believe that this should be provided as an option for these users. We therefore support the proposed solution of two routes to submit "inside information" as the options needs to be available to non-BSC parties. However, it would appear that the scope for applying the requirement not to submit REMIT information through the Grid Code for "commercial or technical reasons" needs to be constrained as far as possible.</p>
IBM UK Ltd for and on behalf of the ScottishPower Group	Yes	<p>ScottishPower believes that Portal-only option would offer the industry the best value and simplest solution assuming the necessary security and authorisation arrangements are made and that the integrity of the system is robust. This would better facilitate Applicable BSC Objective (d) compared with the Proposed (Grid Code submission) option.</p> <p>With a robust automatic data submission 'files upload' arrangement, we do not expect any issue with duplicated data entries and any associated risks. In addition, specific and explicit REMIT entries (rather than selective Grid Code entries) enable parties to</p>

Respondent	Response	Rationale
		<p>synchronise publishing to other platforms (such as their own website). Furthermore, the Portal –only solution would be able to publish the REMIT information quicker than the Grid Code solution (albeit by 5 minutes) enabling parties to trade out their position earlier.</p> <p>ScottishPower acknowledges that such an option may significantly impact one or two parties. However, we believe the workgroup needs to analyse the robustness of the IA information and consider the overall costs and efficiency to the whole industry.</p>
National Grid	Yes	<p>We believe the Portal-only solution would be better than a combined Portal and Grid Code solution. The Portal-only solution could be implemented by June 2014, quicker than any combined Portal and Grid Code solution. The central implementation costs of the Portal only solution are also lower than a combined solution.</p>
SmartestEnergy	No	<p>It will be useful to have the choice.</p>
Centrica	No	<p>Although the combined Portal/Grid Code submission is more expensive and has a longer lead time. I suggest that the costs incurred by industry stakeholders in setting up their own data-feeds to enable a single input into the portal only solution would erode the majority of the benefit to this solution. Additionally, the easier a platform is to use, the more likely market participants are likely to use it, and ultimately the purpose of a central platform would be for all participants to be represented.</p>
E.ON UK	No	<p>While the Portal-only solution would have lower central costs, also enable non-Parties to use this route and be quicker to implement, it would be most useful to have both reporting options available, to enable all market participants to utilise that most suitable for them. Instigating the Grid Code submission route as part of the solution would also best comply with Article 8(5) of REMIT which stipulates that ‘reporting obligations on market participants shall be minimised by collecting the required information or parts thereof from existing sources where possible’. Having both options i.e. multiple input routes available would also be a safeguard in providing parties with an alternative means of reporting should there be any problem with using the other method, although we do anticipate maintaining reporting via our own website as a back-up.</p>

Respondent	Response	Rationale
EDF Energy (late response)	Yes	<p>We think more comprehensive changes to Grid Code operational processes and BMRS or other market reporting may be required as EU regulations currently being developed come into force over the next few years, specifically data transparency and codes concerning capacity allocation, balancing/response/reserve, system operation etc.</p> <p>“Operational” data and “market-related” data overlap with each other, and the historically assumed boundaries between them are likely to change. Operational processes are best suited to automated processing of numerical data, while other information may be more subjective, requiring text based data.</p> <p>Revision of Grid Code processes to accommodate current REMIT messages as proposed will be more costly than the portal-only approach, and take longer. This is particularly significant because use of the functionality will be voluntary, uptake is uncertain, and benefits are uncertain. Changes to NGET Grid Code processes to support this modification in isolation could be inefficient compared with a project to implement all the changes likely to be required to comply with EU regulations. We would not intend to use the Grid Code methods (unless there were no change to the user end of the interface) and think it would be prudent to wait until there is more clarity on EU requirements. This leads us to prefer the modest “Portal-only” solution for the short term, as a relatively low-cost, quick approach, while not rejecting the idea of an NGET method integrated with other changes in the longer-term.</p>

Question 5: Would you find the web-based approach or the Grid Code approach easier to use to submit messages to the BMRS reporting platform?

Summary

Web-based approach	Grid Code approach	Neutral/No Comment
4	5	2

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	N/A	N/A, we are a party agent.
SSE plc	Grid Code	In our view the grid code approach would be easier. In this regard we note that the grid code approach has to be done in any case and therefore using this approach avoids duplication / additional systems in a control room environment.
Drax Power Limited	Grid Code	The Grid Code approach is more consistent with the industry's current method of publishing unit availability data. As such we prefer the Grid Code approach. We note that the web-based approach is workable, but from an IT systems perspective is more risky in terms of the number of systems with which we have to submit data.
Eggborough Power Limited	Grid Code	Eggborough only wants to submit data in to one system, as it is better able to manage the risks associated with data handling, so using the Grid Code data flows would appear to be a more robust solution. There is significant risk of different data going onto different systems if there is more than one system in place where a party has to enter data.
RWE Supply & Trading GmbH	Grid Code	We would find the Grid Code approach easier to use since this is the most robust and consistent source of information. We are concerned that the Portal based approach would require duplication of systems and processes. We are also concerned about the integrity of the data under a Portal based solution.
IBM UK Ltd for and on behalf of the ScottishPower Group	Web-based	ScottishPower believes that Portal-only solution would be simpler to use assuming it is via a robust automatic data submission 'files upload' arrangement. There would be no need to consider whether any Grid Code submissions should be categorised as REMIT information. It is easier and quicker to synchronise

Respondent	Response	Rationale
		with other publication such as to own website.
National Grid	Web-based	For National Grid the web-based approach would be the only applicable route for reporting Transmission related REMIT information, and hence the Grid Code route is not applicable.
SmartestEnergy	Web-based	Web-based would be easier. However, we appreciate some parties would prefer to use just one system.
Centrica	Grid Code	We would find the Grid Code approach easier to use to submit messages than the web-based approach. We strongly believe there should be only one input required in order to report this information to avoid errors and time issues and suggest that the costs associated with a single data feed will be more efficient than market participants having to individually set up their own data feeds.
E.ON UK	Neutral	At this stage it is still hard to estimate the extent of the IT challenge and thus the implementation costs for either solution. However we are confident that for the Portal route the IT implementation costs should be much closer to the lower end of the £0-100k bracket than those for the Grid Code route, though we are hopeful that those for the latter should still not exceed this range. From a process perspective, ongoing web-based submission via the Portal could be undertaken by an individual at the trading point as soon as they were informed by a station of any data that could potentially be 'inside information'; this might be more straightforward to ensure consistent prompt reporting in contracts with responsibility for submission in the extra fields e.g. in MEL redeclarations being spread across various operational colleagues at the control points i.e. power stations. However the Grid Code approach would just be an extension of existing practice. If the Portal-only route was taken, this would require some duplication of effort as National Grid would still have to be informed through the existing channels as well as REMIT reports being made via the Elexon Portal.
EDF Energy (late response)	Web-based	We would only expect to use a method which allows messages to be prepared by our own systems and transmitted using standard formats via the BSCCo Portal for publishing on BMRS. We would expect to use the Portal automated submission method to submit standard messages prepared from the same data as published on our own website. We might use manual entry into website pages as a low-cost fallback, for ad-hoc messages or in the event of

Respondent	Response	Rationale
		<p>internal process failure.</p> <p>We would not expect to use optional changes to Grid Code interfaces, at least in the short term.</p> <p>If mandatory changes to Grid Code interfaces would be required to support submission “by Grid Code methods”, we would not support the proposal. Internal costs and timescales would be longer.</p>

Question 6: 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?

Summary

Yes	No	Neutral/No Comment
10	1	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	All possible solutions/combinations have been listed under P291.
SSE plc	Yes	At this stage we agree with the Workgroup that there are no other potential Alternative Modifications.
Drax Power Limited	Yes	We agree.
Eggborough Power Limited	Yes	-
RWE Supply & Trading GmbH	Yes	-
IBM UK Ltd for and on behalf of the ScottishPower Group	Yes	ScottishPower however would have preferred an alternative where the submission is mandatory rather than optional as we believe that P291 solution will only be fully effective (both functionality and cost) if it is used by all Parties. This would enhance the quality and completeness of the published information in BMRS and therefore better facilitate Objective (c). Nonetheless, ScottishPower accepts that this may be superseded by the forthcoming Transparency Regulation requirement, which will introduce a mandatory Fundamental Data Transparency Platform (FOTP), as it is the industry's expectation that P291 reporting will be compatible with this FOTP platform.
National Grid	Yes	No comments.
SmartestEnergy	Yes	-
Centrica	Yes	-
E.ON UK	Yes	-
EDF Energy (late response)	No	An alternative could be for participants to voluntarily use standard formats for data publishing and register their own websites with the BMRA, and use BMRS to gather and collate data from registered user websites

Respondent	Response	Rationale
		in one place. However, this would reduce the resilience that participants can obtain by actively submitting the same data to separate websites.

Question 7: Please indicate, for both the proposed solution and the potential Portal-only solution, the impacts of the relevant solution on your organisation?

Responses

Respondent	Response
TMA Data Management Ltd	N/A
SSE plc	In principle there would be little difference in impact for both solutions; however, the Portal only solution would be detrimental in terms of additional impact for the reasons set out above.
Drax Power Limited	Both solutions would necessitate changes to our internal IT systems to allow REMIT data to be sent to National Grid or the Elexon Portal (as applicable), in addition to our own reporting website. We consider that the Grid Code approach represents a less risky approach (from an IT systems perspective in terms of the number of systems with which we have to submit data to), although we note that the Elexon Portal approach is workable.
Eggborough Power Limited	The Portal Only solution would create additional risks to our business. We therefore cannot support it being progressed.
RWE Supply & Trading GmbH	The proposed Grid Code solution is more closely aligned with our existing systems and processes. However, the Portal based solution would required the creation of additional information flows, data capture requirements and processes for validation. Therefore, form our perspective the Grid Code arrangements would be preferable.
IBM UK Ltd for and on behalf of the ScottishPower Group	<p>During the IA consultation, ScottishPower has assumed that the Grid Code options would be processed via a separate FTP file sent by parties (rather than through selective modified Grid Code submissions (via EDL) as clarified in subsequent workgroup discussions by National Grid). In re-assessing the impact and practicality of the Grid Code option, ScottishPower found that there would be significant costs for system changes and testing as well as impact on organisational structure and training. We estimate this to be at least £300k. We are also concerned that through this option, REMIT information could simply contain every single Grid Code submission of MEL changes rather than selective ones that would affect the market price.</p> <p>For the Portal-only option, there would be small internal system impact to take into account of the agreed format and interfaces. The one off cost for system changes and set up is not significant (<£10k).</p> <p>Please also note that our IA costs do not include any data retrieval and analysis requirements.</p>
National Grid	The combined Grid Code and Portal solution would require National

Respondent	Response
	Grid system changes.
SmartestEnergy	Unknown.
Centrica	<p>The impacts of the proposed solution would be minimal; it is likely that in addition to our data being published on the Central Platform, we would retain our current web based reporting as a backup. If the portal only solution were to be adopted, we suggest that there would be significant internal costs in setting up a new data stream to enable the use of this platform; it is possible that the decision to not participate in the use of a portal only solution could be made as a result of these additional costs.</p>
E.ON UK	<p>As described in our responses to the Impact Assessment and questions 1 & 5, whichever route(s) are chosen, it will be necessary to develop the IT functionality to both submit information ourselves and capture and store the information published for audit and compliance reporting. Further work may be required to ensure consistency of all data submissions from the short to long-term. Even if we did not intend to submit our own data, creating processes/systems to monitor others' submissions would still be necessary. The Portal solution could be more straightforward in having lower implementation costs and only a matter of ensuring that one trader/control room colleague was responsible for making submissions, instead of potentially requiring this of many people, however that Grid Code route would only be an extension of current submissions, while as above the Portal-only route would lead to duplication of effort as one colleague had to submit the data twice, or once to National Grid while potentially someone else submitted to the Portal, ideally simultaneously.</p>
EDF Energy (late response)	<p>For the proposed solution, we assume there would be no impact on Grid Code interfaces for users who do not choose to use the optional Grid Code route for REMIT reporting on BMRS. This being the case, we would not expect to use the Grid Code method, and it would have no impact on us.</p> <p>We would expect to use the Portal automated submission method to submit standard messages prepared from the same data as published on our own website. We might use manual entry into website pages as a low-cost fallback, for ad-hoc messages or in the event of internal process failure.</p>

Question 8: 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

Summary

Sol'n	Less than £100k	At least £100k but less than £300k	£300k or more	No Costs/No Response
Proposed	4	3	1	3
Portal-only	4	3	1	3

Please note that, where applicable, costs for the Proposed Solution include the costs that would be required to implement the Grid Code route even if the respondent only intends to implement the Portal route in that situation.

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	-	N/A no cost incurred.
SSE plc	£100-300k	At least £100k but less than £300k - estimated based on IT man hours for development and testing plus documentation/procedure changes.
Drax Power Limited	£100-300k	At this stage in the Modification process, we envisage that we would incur an implementation cost in the region of £100k. We consider that the Portal-only solution is slightly riskier to implement (from an IT systems perspective in terms of the number of systems with which we have to submit data to), and as such, this additional risk equates to an additional cost associated with the Portal-only solution. However, it is very difficult to quantify this higher risk based cost.
Eggborough Power Limited	<£100k	Less than £100k.
RWE Supply & Trading GmbH	Proposed: <£100k Portal-only: £300k+	We believe that the Grid Code based solution would require significantly less expenditure (less than £100k) than the Portal-only solution (£300k or more)
IBM UK Ltd for and on behalf of	Proposed:	Less than £100k for Portal only solution; £300k or

Respondent	Response	Rationale
the ScottishPower Group	£300k+ Portal-only: <£100k	more for Grid Code solution. See Qu. 7 answer above.
National Grid	-	This question is assumed to relate only to parties submitting data via both the combined and Portal only solution, and hence is not relevant to National Grid.
SmartestEnergy	-	-
Centrica	Proposed: <£100k Portal-only: £100-300k	We do not believe that we would incur material costs if the proposed solution were to be implemented. If the Portal only solution were to be adopted, I suggest that the costs would be between £100k - £300k and would have the potential to be higher than this, depending on the complexity of the work required.
E.ON UK	<£100k	It is very hard to be confident in the figures but we would expect development and implementation to cost less than £100k for both options, with minimal costs for the portal solution and the hybrid route more likely to be nearer the top of this bracket.
EDF Energy (late response)	Proposed: £100-300k Portal-only: <£100k	<p>A detailed assessment of cost and timescales would be expensive and time-consuming, particularly while a number of options are possible and detailed specifications are not available. We provide approximate provisional estimates here. Costs incurred would include management / oversight costs, training costs and IT development costs.</p> <p>For the portal-only solution, it is not expected that overall costs would exceed £100k, allowing for internal IT build resource to support interfaces and data sourcing (redirection) as well as conversion of existing REMIT website to serve as a back-up for BMRS website in the event of unavailability.</p> <p>We would not expect to use the proposed Grid Code methods, because of the expected requirement to change control point software and associated power station internal processes. The costs for this are roughly estimated to be £200k or more, reflecting the cost of additional training and development of internal control processes.</p>

Question 9: 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?

Responses

Respondent	Response
TMA Data Management Ltd	Unknown
SSE plc	We do not believe it should impact the supply side of the market.
Drax Power Limited	This is best addressed by supply businesses.
Eggborough Power Limited	At the present time Eggborough believes that it is risky to try and predict which data suppliers may have to provide in future. However, the number of larger customers who may become subject to reporting is likely to increase.
RWE Supply & Trading GmbH	<p>The Portal based approach would be consistent with the requirement under REMIT for large customers to submit market sensitive information such as planned and unplanned major outages of qualifying large demands (and the associated reasons).</p> <p>As a general point we would expect that as far as possible the relevant regulation would be aligned; we have already mentioned the Grid Code, Transparency Regulation and REMIT. Under the Transparency Regulation ENTSO-E is required to consult on and develop a procedures manual specifying details and format of data submission which needs to be reflected in updates to ACER's Guidance. In addition, the consultation on the procedures manual may assist in determining what information is appropriate on the consumption side where more clarification would be helpful. Lastly, as the P291 modification proposal in setting out implementation timescales into 2015 demonstrates, the required IT solutions will take time to put in place and this needs to be taken into account</p>
IBM UK Ltd for and on behalf of the ScottishPower Group	ScottishPower believes large demand sites (>100MW), those participating in demand site response and/or any sites which believe could have impact on the market price, may have to report their asset availability under REMIT.
National Grid	No comments.
SmartestEnergy	-
Centrica	As stated before in our response to the Impact Assessment, it would be a useful exercise to determine how many non-Grid Code participants may be likely to use the reporting platform for REMIT reporting.
E.ON UK	We note that consumers of >600 GWh are regarded as wholesale market participants under REMIT whether or not they are active in

Respondent	Response
	<p>the market; we assume that this equates to 68MWh peak demand. Unless they have sites with a potential load swing of 100MW we believe that such customers might only have to register and keep their information up to date.</p>
<p>EDF Energy (late response)</p>	<p>There is still some uncertainty about who will report in the case of consumers exceeding the 600 GWh/year threshold for REMIT reporting indicated in ACER Guidance. There is similar uncertainty about the forthcoming Data Transparency requirements.</p> <p>We anticipate that consumers, as the primary holder of their own operating data and plans, will decide whether to report relevant electricity information themselves, or to use a reporting service provider.</p> <p>There are few individual demand sites that exceed this level, other than interconnectors and pumped storage. For those sites that are BM Units in their own right, we should be relatively easily able to provide a reporting service on behalf of the consumer. It is relatively easy to identify and inform consumers whether individual sites on their own meet the REMIT criteria for reporting.</p> <p>For consumers with multiple sites, the issues are more complicated. If we are the only supplier to the customer and any affiliates and subsidiaries, we should be able to advise, and potentially provide a reporting service by agreement. If we are not the only supplier, there are significant complications.</p> <p>With this proposal, the consumer should be able to submit data itself through the portal route. We may need to put in place procedures to try to ensure that any reporting we may have agreed to do on behalf of a customer is consistent with any reporting it does itself.</p> <p>We anticipate that REMIT reporting for non-BSC consumers (or other non-BSC parties) could be the subject of contractual arrangements between that consumer/party and its Supplier or other reporting organisation party, and the consumer will determine who submits data in practice.</p>

Question 10: Do you have any further comments on P291?

Summary

Yes	No
6	5

Responses

Respondent	Response	Comments
TMA Data Management Ltd	No	-
SSE plc	No	-
Drax Power Limited	Yes	<p>We have some observations on the Message Data Items which we believe should be considered by the Workgroup:</p> <ul style="list-style-type: none"> • Duration uncertainty – we do not believe this should be a mandatory requirement. We believe parties are only required to provide a start date and estimated end date for an event. • Cause – providing a definition for each potential cause of outage is crucial to ensuring that information is not misleading. A list of definitions for potential causes should be developed ASAP. • Contact information – we do not believe that a named contact needs to be provided for Urgent Market Messages. As such we believe this requirement should be voluntary. <p>We note in the legal text that:</p> <ol style="list-style-type: none"> 1. “No later than 5 minutes after receipt, the Transmission Company shall send to the BMRA any Inside Information notifications that it has received from Market Participants via the Grid Code” [6.1.24] 2. “Inside Information Data will be available within two minutes after the BMRA has received such data from the Transmission Company or BSCCo” [2.1.2 (d)] <p>This suggests that, in some instances, there may be a delay of seven minutes (or more) between market participants submitting data and the data’s publication on the BMRS website. This raises the prospect that there may be a mismatch between data submitted on company websites and the BMRS. We consider that this risk is inherent in the desire to create centralised</p>

Respondent	Response	Comments
		<p>reporting platforms, where parties are required to maintain their own reporting infrastructure to remain able to trade during periods of central systems downtime. This risk can be minimised but not completely eradicated.</p> <p>Regulatory authorities will need to be sympathetic to instances of potential data mismatch between different websites / platforms that are caused by IT system reporting delays. Without this understanding, the benefits of centralised reporting platforms may not be achieved.</p>
Eggborough Power Limited	No	-
RWE Supply & Trading GmbH	Yes	We believe that any solution should be clearly aligned with the Transparency Regulation (under Issue 47).
IBM UK Ltd for and on behalf of the ScottishPower Group	Yes	ScottishPower notes that ENTSO-E is required to provide a central information transparency platform, the 'Electricity Market Fundamental Information Platform' (EMFIP), and ACER intends that EMFIP should meet the requirements for a platform publishing REMIT inside information (particularly in the context of generator unavailability). We therefore hope that a holistic approach (may be led by Ofgem) is taken to ensure parties would not have to submit duplicate information and any system changes and costs incurred for P291 and other modifications would not be duplicated or become redundant.
National Grid	Yes	<p>The combined Grid Code and Portal solution will require changes to National Grid Systems.</p> <p>The assessment consultation refers to two specific systems which may need modifications, TOGA (Transmission Outage and Generator Availability) and EBS (Electricity Balancing System). We have continued to explore the delivery of the combined Grid Code and Portal solution. This has identified issues with the TOGA architecture, particularly the P291 requirement of real time dynamic submission of data, which may mean it is not the most efficient delivery of the solution required by P291 (submission of data by Grid Code users for prompt onward solution to the BMRS). The eventual solution to deliver the Grid Code component of P291 will depend on the most efficient solution identified and may not include TOGA.</p>
SmartestEnergy	No	-

Respondent	Response	Comments
Centrica	No	-
E.ON UK	Yes	<p>We would appreciate further clarification on how submissions would work in practice; we presume for instance that where an 'Event Status' remains open a participant would submit a further message with any update available that would overwrite the previous information published, although the initial message would still be archived on the BMRS.</p> <p>Would limits be put in place such that not only if a required field was not completed but also that values differed from those expected, the submission would be rejected? (For instance if a file noting an issue affecting <100MW was submitted, as some parties publish information on smaller values on their websites, with the danger that the number of such extraneous reports swamp those that are more significant).</p> <p>While outside the scope of P291, it is perhaps unfortunate that ACER's Guidance mentions only that market participants for an interim period, until a centralised solution is available, will be able to publish on their own websites (though we note that in fact forms of social media are used by some participants). Although the Assessment Consultation states that parties publishing data 'on their own websites (or by other reporting channels, for example social media) .. makes it difficult to locate all the published information' we note that if all parties actually used the same platform, e.g. Twitter, that could actually provide a more practical interim and potentially enduring solution for all GB market participants, parties and non-parties, than having to monitor various web pages and other social media. It could have the advantage of being absolutely public/transparent, and to our knowledge robust. If this was in place, intuitively collating such feeds from other participants and/or into a central system would be simpler than monitoring multiple sources of information as is necessary at present, or developing other routes to publish centrally as P291 seeks. However as multiple routes are used by parties at present and we understand that some companies are reluctant to use such tools, P291 would be a step forward in providing a standard form for communication of inside information via the Portal/Grid Code. That being the case, it would be prudent as ever if costs could be kept as low as possible particularly when it seems doubtful that non-</p>

Respondent	Response	Comments
		<p>parties might ever have to do anything but register as market participants. That said, we support providing the Grid Code route as this would allow companies to choose the most appropriate solution for them, and a potential back-up option, while best complying with REMIT Article 8.</p>
<p>EDF Energy (late response)</p>	<p>Yes</p>	<p>See the last comments, 12 and 13, on the legal text, repeated here.</p> <p>The proposed solution refers to BSC Category A Authorised Signatories being able to submit data and to delegate authority for their 'assets', and an equivalent process for non-BSC Parties (for example, page 7 and page 15 of the consultation document). However, this is not described in the legal text, and because it concerns the potential transfer of important activities between parties (and non-parties), it probably should.</p> <p>The legal text should make reference to the possibility of non-BSC Parties using the Portal submission functionality to report data on BMRS, and should provide protection for BSC Parties (who pay for and will be the main users of the functionality) by requiring BSCCo to set out terms, to be agreed by the BSC Panel, for submission of data by non-BSC Parties. These should aim to protect BSC parties from misuse or abuse of the system, from incurring excessive costs on behalf of non BSC-parties, and from any liability for publication of misleading data.</p>