



Consultation Response

By email to consultation2013R02@acer.europa.eu

Response from:

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Consultation Response

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Agency for the Cooperation of Energy Regulators

Trg Republike 3

1000 Ljubljana

Slovenia

Dear Sir/Madam,

ELEXON Ltd's response to ACER's consultation: REMIT – Technical Standards for Trade Reporting

We welcome the opportunity to respond to this consultation.

What is ELEXON Ltd's role?

ELEXON Ltd delivers the centrally-mandated electricity settlement services that are critical to the successful operation of Great Britain's electricity trading arrangements under the national GB Balancing and Settlement Code (BSC). We manage processes and systems from electricity meter to bank, handling over £1.5 billion of transactions and interacting with over 250 companies in the British electricity industry. As part of this we administer the settlement of the GB Balancing Mechanism and GB imbalance settlement for generators and suppliers (retailers) in respect of each half hour of each day. We are independent of any specific interests within the electricity sector.

Our response

The views expressed in this response are those of ELEXON Limited alone, and do not seek to represent those of the Parties to the GB Balancing and Settlement Code (BSC). And our response does not seek to favour any particular policy but rather to comment on the practical implementation.

The structure of this response is as follows:

- General comments
- Answer to specific consultation Question viii (taxonomy)

General Comments

Balancing market contracts

We believe that the GB Balancing Mechanism will be required to report Bids, Offers and Bid-Offer Acceptances (contracts) under REMIT, although from previous consultations we understand that balancing market contracts will not be reportable in the first phase. In particular, we note the recent [Recommendation](#) from ACER that such contracts are reportable only from 12-24 months after the day of entry into force of the Network Codes on Electricity Balancing and on Gas Balancing.



Consultation Response

And it appears from this particular consultation (PC_2013_R_02), that balancing market contracts are not being considered at this stage. While this may be appropriate particularly if the European Commission adopts the ACER Recommendation, we would ask ACER to consider, at the appropriate time, whether balancing market contracts have features that are not catered for in the proposals in this consultation. For example, Annex II of the consultation (taxonomy) could not include balancing market contracts as these are not identified in the transaction types and do not have a pre-set duration (at least in the current GB Balancing Mechanism).

In view of the fact that it is likely that contracts in the GB Balancing Mechanism or any replacement will have to be reportable under REMIT in due course, we have reviewed what it would mean if we were required to report on GB Balancing Mechanism transactions in future. And, because any such future reporting requirement will take time to implement, we would request that ACER consults again before requiring such balancing market/mechanism reporting, so that we can give views on implementation timescales.

Other reportable data

However, although we understand that balancing market contracts are not reportable in the first phase, it appears that some related data will be required in the first phase. In particular, we intend to seek the views of our NRA, Ofgem, as to what is required for the reporting of electricity nominations and schedules in the context of the GB electricity market.

Specific consultation Question viii (taxonomy)

Annex II does not yet cover balancing market contracts, so we assume this will be covered in a later consultation.

In conclusion

We hope that our comments are helpful to the development of the reporting processes and systems under REMIT. If you would like to discuss our response, please do not hesitate to contact me on +44 20 73 80 42 53, or by email at steve.wilkin@ellexon.co.uk.

Yours faithfully

Steve Wilkin
Senior Market Advisor