



Stage 03: Assessment Report

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

P297: Receipt and Publication of New and Revised Dynamic Data items

This Modification Proposal seeks to ensure that the Dynamic Data Set in the BSC and published on the Balancing Mechanism Reporting Service reflects the revised Dynamic Data Set that is sent by the Transmission Company.

This Assessment Consultation for P297 closes:

5pm on Thursday 24 October 2013

The Workgroup may not be able to consider late responses.



The P297 Workgroup initially recommends:

- **Approval** of P297



High Impact:

- Balancing Mechanism Reporting Service (BMRS)
- Transmission Company



Medium Impact:

- ELEXON

P297
Assessment Consultation

3 October 2013

Version 1.0

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Any questions?

Contact:

Claire Anthony



claire.anthony@elexon.co.uk



020 7380 4293

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About this document:

The purpose of this P297 Assessment Consultation is to invite BSC Parties and other interested parties to provide their views on the merits of P297. The P297 Workgroup will then discuss the consultation responses, before making a recommendation to the BSC Panel. The BSC Panel will then consider the Workgroup recommendations at its meeting on 14 November 2013 and make an initial recommendation on whether or not P297 should be approved

There are five 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, and contains details of the Workgroup's membership and full Terms of Reference.
- Attachment A contains the draft redlined changes to the BSC for the P297 Proposed solution.
- Attachment B contains the draft redlined changes to the NETA IDD Part 1
- Attachment C contains the draft redlined changes to the NETA IDD Part 2
- Attachment D 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**: P297 Proposed Legal Text

Attachment **B**: Draft redlined changes to NETA IDD Part 1

Attachment **C**: Draft redlined changes to NETA IDD Part 2

Attachment **D**: Assessment Consultation Questions

For further information, including a complete version of the impact assessment responses received, please see the [P297](#) page of the ELEXON website.

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Why Change?

The Grid Code Electricity Balancing System (EBS) Working Group has been progressing changes to the Dynamic Data Set in preparation for EBS go-live in the third quarter of 2014. The market information provided on the BMRS has an important role in promoting effective competition in the generation and supply of electricity. A subset of this information is the Dynamic Data Set used by the Transmission Company as part of determining which Bids and Offers to accept in the Balancing Mechanism. Consequently it is important that the Dynamic Data Set published on the BMRS is the same as that submitted to, and used by, the Transmission Company.

Solution

P297 proposes to modify Sections Q and V of the BSC to include the new data item to the existing Dynamic Data Set, therefore aligning the BSC with the Grid Code.

P297 will also modify the BMRA and Settlement Administration Agent (SAA) systems to enable the Balancing and Settlement Code Company (BSCCo) to receive and publish the new and revised Dynamic Data items from the Transmission Company.

Impacts & Costs

P297 impacts the Balancing and Settlement Code (BSC), BMRS, SAA and the Transmission Company. The changes will align the BSC with changes that have been made, or are in the process of being made, to the Dynamic Parameter set in the Grid Code.

The central implementation cost of the proposed solution is approximately £134k comprising:

- £122k in system change costs to amend the BMRA and SAA systems so they can receive and publish the new and revised Dynamic Data Items and
- £12k in ELEXON effort.

As part of this consultation the Workgroup wishes to clarify and confirm industry costs and impacts.

Implementation

P297 is proposed for implementation on 6 November 2014 as part of the November 2014 BSC Systems Release if an Authority decision is received on or before 28 January 2014, which is after the planned go-live date of National Grid's new Electricity Balancing System (EBS) system, but prior to BSC Parties submitting the new and revised Dynamic Data to National Grid.

Workgroup's Recommendation

The Workgroup initially unanimously believes that the P297 Proposed solution would better facilitate Applicable BSC Objectives (c) and a majority believe it would better facilitate Applicable BSC Objective (d). Therefore, the P297 Workgroup initially recommends that P297 is approved.

2 Why Change?

Background

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 the Transmission Company relating to balancing actions and indicative data relating to Balancing and Settlement, such as 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. However, 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 for a charge (in accordance with Section D), where the information is sent to them directly via a TIBCO¹ feed; or they can use the free 'low-grade' service, the BMRS website². The low-grade service is freely available to anyone.

What is EBS?

National Grid is replacing the exiting Balancing Mechanism (BM) system with a new system, Electricity Balancing System (EBS), for balancing the real-time electricity supply and demand. EBS will issue instructions including Bid-Offer Acceptances (BOAs) and Ancillary Services, and will deliver data to the BMRS, SAA and Ancillary Services Settlement. The new system is planned to go-live in the third quarter of 2014, and provides new capabilities that could be used in the Great Britain (GB) market if appropriate.

National Grid are aiming for no data or technical changes to be made to the interfaces Electronic Data Transfer (EDT) and Electronic Data Logging (EDL) at go-live. As such, National Grid has agreed to give market participants six months to five years to introduce and move to the new web-technology interfaces. For market participant data submissions this will be known as EDT* which will incorporate enhancements to market participant data.

What is the Dynamic Data Set?

The market information provided on the BMRS has an important role in promoting effective competition in the generation and supply of electricity. A subset of this information is the Dynamic Data Set³ used by the Transmission Company as part of determining which Bids and Offers to accept in the Balancing Mechanism.

The Dynamic Data Set comprises of a set of data items (currently consisting of 10 data items), each of which are defined in the Grid Code. For each relevant BM Unit, the Lead Party needs to ensure that those data items forming part of the Dynamic Data Set are submitted to the Transmission Company in accordance with the provisions of the [Grid Code](#). Due to the



What is the Balancing Mechanism?

Is the hour to an hour and a half following real time in which trading has ceased and within which National Grid may issue Bids or Offers to BM Units to balance supply and demand on a minute-by-minute basis in order to maintain system frequency close to 50Hz and to ensure that power flows do not exceed the capability of the system.



What is the Grid Code?

The Grid Code covers all material technical aspects relating to connections, to and the operation and use of the National Electricity Transmission System; including or, in as far as relevant to the operation and use of the National Electricity Transmission System, the operation of the electric lines and electrical plant connected to it or to a distribution system of any authorised distributor.

¹ Software which provides Parties a mechanism for automated publication of Balancing Mechanism Reporting Agent (BMRA) data to each Parties site.

² <http://www.bmreports.com/>

³ <http://www.elexon.co.uk/glossary/dynamic-data-set/>

introduction of EBS, the Grid Code Electricity Balancing System Working Group⁴ was formed and has subsequently been progressing changes to the Dynamic Data Set.

The changes to the Dynamic Data Set arising from the Grid Code Electricity Balancing System Working Group was the revision of two existing Dynamic Data Items⁵ and the addition of a new Dynamic Data Item⁶

What is the Issue?

In order to ensure that the Dynamic Data Set received by BSCCo and published on the BMRS and SAA fully corresponds to the revised Dynamic Parameter set in the Grid Code, it is necessary to modify Sections Q and V of the BSC to reflect the changes to the Grid Code. In addition, the BMRS and SAA systems need to be amended in order to be able to receive, process and publish the content of the new and revised Dynamic Data items.

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⁴ <http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/workinggroups/ElectricityBalancingSystemGroup/>

⁵ Run-Up Rates (Import and Export) and Run-Down Rate (Import and Export) and Stable Export Limits and Stable Import Limits

⁶ Last Time to Cancel Synchronisation



What is the proposed solution?

P297 proposes to modify Sections Q and V of the BSC to reflect the changes in the Dynamic Data Set in the Grid Code. The BMRS and SAA system also will be amended to receive and publish the new and revised Dynamic Data items from the Transmission Company.

Proposed Solution

P297 proposes to amend the BSC to reflect the changes in the Dynamic Data Set under the Grid Code. BSC Sections Q 'Balancing Mechanism Activities' and V 'Reporting' of the BSC will need to be updated whilst the BMRS and SAA will need to be modified to receive and publish the new and revised Dynamic Data from the Transmission Company.

Impact on BMRS and SAA

The main impact on the BMRS and SAA systems are the ability to receive and then publish the new and revised Dynamic Data items sent by the Transmission Company.

The one new and two revised Dynamic Data items that will be changed as part of the P297 solution are set out below:

NEW Data Item: Last Time to Cancel Synchronisation (LTCS)

This is a new Dynamic Data Parameter which has been recently introduced into the Grid Code, via Grid Code Change Proposal B/12⁷. The data in the table details the proposed content and format of the Dynamic Data as received by National Grid:

Field Name	Description
Unit Name	A valid unit name for which the data is submitted. The participant must have privileges to submit data on this unit.
Effective Time	Time received by National Grid
Last Cancel Time 1	Last Time (in minutes) to Cancel Sync 1. Applies for: $0 < NDZ \leq CS \text{ Break Point (CSBP) } 2$. VX-1: Must be an integer and between 0 and 60 (inclusive).
CS Break Point 2	Last Time to Cancel Sync/NDZ Breakpoint 2. VX-1: Must be an integer and between 0 and 999 (exclusive).
Last Cancel Time 2	Last Time (in minutes) to Cancel Sync 2. Applies for: $CSBP 2 < NDZ \leq CSBP 3$. VX-1: Must be an integer and between 0 and 60 (inclusive).
CS Break Point 3	Last Time to Cancel Sync/NDZ Breakpoint 3. VX-1: Must be an integer and between 0 and 999 (exclusive). VR-2: CSBP 3 must be greater than CSBP 2.
Last Cancel Time 3	Last Time (in minutes) to Cancel Sync 3. Applies for: $NDZ > CSBP 3$. VX-1: Must be an integer and between 0 and 60 (inclusive).

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⁷ <http://www.nationalgrid.com/NR/rdonlyres/6CBB2031-42F2-4382-9BBA-15F63F5BE797/58236/B12D.pdf>

Following the receipt of the proposed data by the Transmission Company, below is what will be sent to BMRA:

Field	Format	Units	Comments
BMU Name	Text	—	Name of BM Unit.
Effective Time	Date Time	—	Effective time of the Last Time to Cancel Sync.
Last Cancel Time 1	Integer	Minutes (max 2 digits)	Last Time to Cancel Sync 1. Applies for: $0 < NDZ \leq CS$ Break Point (CSBP) 2
CS Break Point 2	Integer	Minutes (max 3 digits)	Last Time to Cancel Sync/NDZ Breakpoint 2.
Last Cancel Time 2	Integer	Minutes (max 2 digits)	Last Time to Cancel Sync 2. Applies for: $CSBP2 < NDZ \leq CSBP3$
CS Break Point 3	Integer	Minutes (max 3 digits)	Last Time to Cancel Sync/NDZ Breakpoint 3.
Last Cancel Time 3	Integer	Minutes (max 2 digits)	Last Time to Cancel Sync 3. Applies for: $NDZ > CSBP3$

It is envisaged that submission will be ad-hoc and infrequent e.g. once a year per BM Unit.

Revised Data Item: Run-Up Rates (Import and Export) and Run-Down Rate (Import and Export)

This will involve enabling the BMRS to accommodate up to ten rates and a reduced minimum rate of 0.02MW/min. A Grid Code change is being progressed in parallel to this Modification Proposal⁸.

The change in the number of Run-Up and Run-Down Rates would increase the maximum number of time and power co-ordinates in a Bid-Offer Acceptance.

The table below details the proposed content and format of the Dynamic Data as received by National Grid for Run-Up Rate(s) and Run-Down Rate(s) for both Import and Export. The key changes are underlined and highlighted in red:

Field Name	Description
Unit Name	A valid unit name for which the data is submitted. The participant must have privileges to submit data on this unit.
Run Rate Type	Valid Run Rate types are "RUN_UP_EXPORT", "RUN_DOWN_EXPORT", "RUN_UP_IMPORT" and "RUN_DOWN_IMPORT". VX-1: Must be one of the valid run rate types.
Effective Time	Time received by National Grid

⁸ Grid Code Review Panel Paper Ref: pp13/04 from the 16 January meeting provides more information on this subject - <http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/reviewpanelinfo/2013/16th+January/>



What are 'Run-Up' and 'Run-Down' Rates?

Run-up and Run-Down rates are data items within the Dynamic Data Set.

Run-Up Rates and Run-Down Rates are both the rates at which a BM Unit can run down Export or Import MW. Also a set of data supplied by the System Operator for publication on the BMRS, comprising for each BM Unit: Up to three Run-Up Rate(s) expressed in MW/minute and associated Run-Up Elbow(s) expressed in MW for output (Export) and the same for input (Import).

Field Name	Description
Rate	Run Rate in MW/minute. <u>Maximum of 10 rates can be submitted.</u> <u>VX-1: Must be between 0.02 and 999.0, with a maximum of 2 decimal places.</u>
Quantity	Elbow value in MW. Maximum of <u>9</u> quantities can be submitted. Rate and quantity are submitted in pairs except the first rate. VX-1: Must be integer between -9999 and +9999. VR-2: If the run rate type is "RUN_UP_EXPORT" or "RUN_DOWN_EXPORT", the quantity must be greater than or equal to 1. VR-3: If the run rate type is "RUN_UP_IMPORT" or "RUN_DOWN_IMPORT", the quantity must be less than or equal to -1. VR-4: The quantities, if not null, must be in increasing order (ex. Q2 > Q1; Q3 > Q2; etc.) for "RUN_UP_EXPORT" and "RUN_UP_IMPORT". VR-5: The quantities, if not null, must be in decreasing order (ex. Q2 < Q1; Q3 < Q2; etc.) for "RUN_DOWN_EXPORT" and "RUN_DOWN_IMPORT".

Following the receipt of the proposed data by the Transmission Company, one report for each Run-Up Rates, Run-Down Rates and Import and Export will be sent to BMRA meaning there will be 4 in total. The ability to process an increased number of quantities and elbows will need to be duplicated across all 4. The proposed format for each is as follows:

Field	Format	Units	Comments
BMU Name	Text	—	Name of BM Unit.
Effective Time	Date Time	—	Effective time of the Run Rate.
Rate 1	Numeric	MW/min.	Run rate 1.
Quantity 2	Numeric	MW	Elbow 2.
Rate 2	Numeric	MW/min.	Run rate 2.
Quantity 3	Numeric	MW	Elbow 3.
Rate 3	Numeric	MW/min.	Run rate 3.
<u>Quantity 4</u>	<u>Numeric</u>	<u>MW</u>	<u>Elbow 4.</u>
<u>Rate 4</u>	<u>Numeric</u>	<u>MW/min.</u>	<u>Run rate 4.</u>
<u>Quantity 5</u>	<u>Numeric</u>	<u>MW</u>	<u>Elbow 5.</u>
<u>Rate 5</u>	<u>Numeric</u>	<u>MW/min.</u>	<u>Run rate 5.</u>
<u>Quantity 6</u>	<u>Numeric</u>	<u>MW</u>	<u>Elbow 6.</u>
<u>Rate 6</u>	<u>Numeric</u>	<u>MW/min.</u>	<u>Run rate 6.</u>
<u>Quantity 7</u>	<u>Numeric</u>	<u>MW</u>	<u>Elbow 7.</u>
<u>Rate 7</u>	<u>Numeric</u>	<u>MW/min.</u>	<u>Run rate 7.</u>
<u>Quantity 8</u>	<u>Numeric</u>	<u>MW</u>	<u>Elbow 8.</u>
<u>Rate 8</u>	<u>Numeric</u>	<u>MW/min.</u>	<u>Run rate 8.</u>

Field	Format	Units	Comments
<u>Quantity 9</u>	<u>Numeric</u>	<u>MW</u>	<u>Elbow 9.</u>
<u>Rate 9</u>	<u>Numeric</u>	<u>MW/min.</u>	<u>Run rate 9.</u>
<u>Quantity 10</u>	<u>Numeric</u>	<u>MW</u>	<u>Elbow 10.</u>
<u>Rate 10</u>	<u>Numeric</u>	<u>MW/min.</u>	<u>Run rate 10.</u>

As is the current case with up to three Run-Up rates, all ten fields will not always be used but the functionality needs to be present in case all of them are used. The frequency of each Run-Up Rates, Run-Down Rates and Import and Export will be ad-hoc, however, there may be multiple submissions per day which will mainly be by BM Units that actively participate in the Balancing Mechanism.

Revised Data Items: Stable Export Limits and Stable Import Limits

This will involve moving from an existing static parameter to time-varying profiles similar to Maximum Export Limit and Maximum Import Limit. It should be noted that the new data will have a similar format to the existing Maximum Export and Import Limits.

The data in the table details the proposed content and format of the Dynamic Data as received by National Grid:

Article I. Field Name	Article II. Description
• Unit Name	• A valid unit name for which the data is submitted. The participant must have privileges to submit data on this unit.
• Start Time	<ul style="list-style-type: none"> • Start time of the Stable limit. • VX-1: Must be valid XML time format. • VR-2: Must be greater than or equal to the end of the current National Grid system time (rounded down to the minute level (truncate the seconds field)). • VR-3: Must fall within the same Operational Day as the header "Date" attribute. • VR-4: Start time must be within the current Operational day and next five Operational days.
• End Time	<ul style="list-style-type: none"> • End time of the Stable limit and is optional. If it is not submitted, the Stable Limit submission will be open-ended and the End date/time will be stored as NULL in the database. • VX-1: If submitted, it must be valid XML time format. • VR-2: If submitted, end time must be later than the Start Time. • VR-3: If submitted, must fall within the same Operational Day as the header "Date" attribute. • VR-4 [Start Time, End Time]: The time range must cover distinct time ranges in a submission.



What are Stable Export Limits and Stable Import Limits?

The **Stable Export Limit** is a positive MW value, expressing the minimum stable export operating level for BM Unit i.

The **Stable Import Limit** is a negative MW value, expressing the minimum stable import operating level for BM Unit i.

Article I. Field Name	Article II. Description
<ul style="list-style-type: none"> Limit Type 	<ul style="list-style-type: none"> Valid types are "STABLE_EXPORT", and "STABLE_IMPORT". VX-1: Must be one of the valid Limit types.
<ul style="list-style-type: none"> From Value 	<ul style="list-style-type: none"> From MW value of the Stable Export/Import. VX-1: Must be an integer between -9999 and +9999. VR-1: If the type is "STABLE_EXPORT", value must be greater than or equal to 0. VR-2: If the type is "STABLE_IMPORT", value must be less than or equal to 0.
<ul style="list-style-type: none"> To Value 	<ul style="list-style-type: none"> To MW value of the Stable Export/Import. VX-1: Must be an integer between -9999 and +9999. VR-1: If the type is "STABLE_EXPORT", value must be greater than or equal to 0. VR-2: If the type is "STABLE_IMPORT", value must be less than or equal to 0. VR-5 [End Time, To Value]: If the End Time is not submitted (NULL), then the "To Value" must be equal to "From Value".

Following receipt of the proposed data by the Transmission Company there will be two separate reports; one report for Stable Export Limits and another for Stable Import Limits.

The proposed format for what will be sent to BMRA for [Stable Export Limits](#) is as follows:

Field	Format	Units	Comments
BMU Name	Text	—	Name of BM Unit.
Start Time	Date Time	—	Start time of the Export Limit.
From Value	Numeric	MW	Stable Export Limit From value.
End Time	Date Time	—	End time of the Export Limit.
To Value	Numeric	MW	Stable Export Limit To value.

The proposed format for what will be sent to BMRA for [Stable Import Limits](#) is as follows:

Field	Format	Units	Comments
BMU Name	Text	—	Name of BM Unit.
Start Time	Date Time	—	Start time of the Import Limit.
From Value	Numeric	MW	Stable Import Limit From value.
End Time	Date Time	—	End time of the Import Limit.
To Value	Numeric	MW	Stable Import Limit To value.

The frequency of the Stable Export Limits and Stable Import Limits will be ad-hoc. Some active participants in the Balancing Mechanism may not resubmit Stable Export Limits and Stable Import Limits from one year to the next. Other participant e.g. multi-shaft

Combined Cycle Gas Turbine (CCGT⁹) modules and Cascade Hydro Schemes may submit Stable Export Limits multiple times within a day.

Publishing the data

When the new and revised Dynamic Data items proposed are submitted, they will be processed and published in a consistent manner to the existing data items “not later than 5 minutes following receipt from the Lead Party” in accordance with BSC Section Q, 6.1.9.

The data will then be reported via a new table accessible from the Dynamic Data search on the BM Unit data screen. The data will also be sent via TIBCO, in a format similar to other existing Dynamic Data items.

File Format of revised Dynamic Data Items (applicable to the Transmission Company and ELEXON)

As well as making changes to the Dynamic Data Set, the file format of the two revised Dynamic Data items will be changed from CSV¹⁰ to XML¹¹. Only the new and revised files provided by the Transmission Company, whether in relation to BMRA-I002¹², BMRA-I003¹³ or any other relevant interface requirement, will make use of the XML format. All other existing flows will remain in the CSV format with a provision to change to the XML format at a time when it is efficient to do so.

File Format of new Dynamic Data Item Items (applicable to the Transmission Company and ELEXON)

For the new Dynamic Data item LTCS, this data will be sent from the Transmission Company to the BSCCo in XML format only.

NEW Data Item – (not included in the Proposed solution): Synchronising Interval & De-synchronising Interval at a BM Unit level

This new data item included in the P297 Modification Proposal and P297 Initial Written Assessment (IWA) as presented to the Panel on 8 August 2013, has now been removed from the scope of this Modification Proposal. It was agreed by the Workgroup and the Proposer that this data item could not be progressed as part of P297 at this time. The rationale for this is that the Dynamic Data item does not currently exist in the Grid Code, nor is it currently in the process of being introduced via a parallel Grid Code Modification. Removing this new Dynamic Data item from the Proposed solution, mitigates the risk that the new Dynamic Data item is approved and added to the BSC before it is introduced to the Grid Code.

This data item was excluded from the Proposed solution as the purpose of P297 is to align the BSC with the Grid Code. However it should be noted that a subsequent Modification would need to be made at a later date once this Dynamic Data item is added to the Grid Code.

⁹ A collection of Generating Units (registered as a CCGT Module) comprising one or more Gas Turbine Units (or other gas based engine units) and one or more Steam Units connected to the Transmission System

¹⁰ Comma Separated Values (simple file format)

¹¹ eXtensible Markup Language(text data widely used by industry)

¹² (input) Balancing Mechanism Data

¹³ (input) System Related Data

Deploying the Proposed solution (applicable to the Transmission Company, ELEXON and BSC Parties)

The P297 implementation approach is set out in Section 6, however, the implementation of the actual system changes will be such that the CSV and XML formats can be accepted in parallel.

To minimise impact on recipients of TIBCO messages, it is envisaged that from go-live of P297, the message structure will be in the new format. However, it is currently unknown when the input will become XML and therefore it will be necessary to map the existing CSV input into the new TIBCO message structure. Since the design of the new structure is based on the new XML input flows, there may be some instances where new fields cannot be mapped and in such cases those fields will be left with a 'null' message.

BSC Legal Text

The data items that comprise the Dynamic Data Set are not just found in the Grid Code, but also in BSC Sections Q and V. BSC Section Q details the information that the Transmission Company is obligated to send to BSCCo, whilst BSC Section V outlines the data that is reported on the BMRS.

The Proposed solution will involve adding the new data item 'Last Time to Cancel Synchronisation' to the existing wording in the Dynamic Data Set in Sections Q and V of the BSC. No further revision to the Dynamic Data set are required as the names of the two revised data items are not changing, only the format, which are captured in the NETA Interface Definition and Design (IDD).

The proposed redlined changes to the BSC for the P297 Proposed solution can be found in Attachment A.

Assessment Consultation Question

Do you agree that the draft legal text in Attachment A delivers the intention of the P297 Proposed solution?

Please provide rationale.

The Workgroup invites you to give your views using the response form in Attachment D

NETA IDD Part 1 and NETA IDD Part 2 Redlining

The NETA IDD Part 1 'Interfaces with BSC Parties and their Agents' and NETA IDD Part 2 'Interfaces to other Service Providers' require revisions to capture the changes in the format of the revised Dynamic Data items and to include the new Dynamic data item.

The proposed redlined changes to the NETA IDD Part 1 and NETA IDD Part 2 for the P297 Proposed solution can be found in Attachments B and C respectively.

Assessment Consultation Question

Do you have any comments on the draft redlined changes to NETA IDD Part 1 (Attachment B) and NETA IDD Part 2 (Attachment C)?

Please provide rationale.

The Workgroup invites you to give your views using the response form in Attachment D

4 Other Solutions considered

As detailed in Section 7, as the Proposer revised the Proposed solution to add the new Dynamic Data item to the Dynamic Data set list in the Code, no alternative solutions were developed.

Assessment Consultation Question

Are there any other Alternative Solutions that the P297 Workgroup should consider?
Please provide rationale.

The Workgroup invites you to give your views using the response form in Attachment D

Estimated central implementation costs of P297

The total central implementation costs for the P297 Proposed solution is approximately £134k. This comprises of:

- Approx. £122k in system change costs to amend the BMRA and SAA; and
- Approx. £12k in ELEXON effort.

Impacts

Impact on BSC Systems and process

BSC System/Process	Potential impact
BMRS	The BMRS and SAA will be updated to receive and publish the new and revised Dynamic Data from the Transmission Company.
SAA	

Impact on BSC Parties and Party Agents

None as the proposed change would align the BSC with the Grid Code.
However, the TIBCO messages received by parties in relation to the two revised Dynamic Data items will change when the file format of the Dynamic Data items switches over to XML. When this occurs, the content will differ as shown by the changes to them detailed in Section 3.

Impact on Transmission Company

The Transmission Company will be obligated to submit the updated Dynamic Data to BSSCo.

Impact on ELEXON

Area of ELEXON's business	Potential impact
Release Management	ELEXON will manage the implementation project.

Impact on Code

Code section	Impact
Section Q	Changes will be required to implement the Proposed solution which can be found in Attachment A.
Section V	
Section X-2	

Impact on Code Subsidiary Documents	
CSD	Potential impact
NETA IDD Part 1	Changes will be required to implement the Proposed solution which can be found in Attachments B and C respectively.
NETA IDD Part 2	

Impact on other Configurable Items
None

Assessment Consultation Question
<p>Please indicate the impacts of the Proposed solution on your organisation, in particular any perceived lead time and costs.</p> <p><i>Please provide your rationale.</i></p>
<p>The Workgroup invites you to give your views using the response form in Attachment D</p>

Recommended Implementation Approach

The Workgroup initially recommends an Implementation Date for P297 of:

- 6 November 2014 as part of the November 2014 BSC Release if a decision is received on or before 31 January 2014; or
- 26 February 2015 as part of the February 2015 BSC Release if a decision is received after 31 January 2014 but on or before 31 May 2014.

Assessment Consultation Question

Do you agree with the Workgroup's recommended Implementation Approach?

Please provide your rationale.

[The Workgroup invites you to give your views using the response form in Attachment D](#)

The Implementation date is a decision by date driven by the lead time required by BSC Agents to make the necessary system changes to facilitate the implementation of P297. The Workgroup is keen to implement P297 before the end of 2014 to ensure the BSC aligns with the Grid Code changes and the new EBS system, envisaged to go-live in the third quarter of 2014.

The 31 January 2014 decision by date takes into account the Authority's 25 Working Day (WD) KPI and additional 7 WD tolerance for the Christmas and New Year period, while allowing sufficient time following a decision for the changes to be developed and ready for the November 2014 Release.

A fall-back implementation date of 26 February 2015 as part of the February 2015 BSC Release has been included in case a decision cannot be provided until after the 31 January 2014 decision by date. The decision by date for the February 2015 Release factors in the same amount of development time as per the November 2014 Release date.



Recommendation

The Workgroup initially unanimously recommends approval of P297.

The following section provides details on the P297 Workgroup discussions that led to the Proposed solution.

Discussion on the Proposed Solution

In the P297 Modification Proposal the Proposer set out two approaches for capturing the Dynamic Data item changes in the BSC. These two approaches were:

- Remove the complete Dynamic Data Set list from Sections Q and V and instead cross reference the Grid Code; or
- Add the new data items to the Dynamic Data Set in Sections Q and V.

Initially, the Proposer considered that the Proposed solution would remove the complete Dynamic Data Set list from Sections Q and V and cross reference the Grid Code. The rationale for this is that it would potentially save future time and effort of raising Modifications to add, amend (if a name change occurred) or remove a Dynamic data item from the Code. Instead any changes to the Dynamic Data would be captured in the relevant CSDs and progressed via a Change Proposal (CP).

The majority of the Workgroup initially agreed that this would amount to a significant material change, with some Workgroup members commenting that for ease of reference, an explicit list in the BSC is an obvious starting point for market participants to go to. Removing the list would cause disruption and would result in parties only having to refer to another document or having to search through a large number of CSDs.

A Workgroup member also expressed the view that if the Dynamic Data set was removed from the BSC, future changes, if progressed through a CP, may not get the same level of attention that a Modification Proposal receives. This prompted the group to consider that a potential Alternative solution would be required if the Proposed solution remained unchanged, which would only add the new Dynamic Data item to the Code rather than removing the list.

The Proposer took on board the concerns of the Workgroup members and agreed to change the Proposed solution so that the new Dynamic Data item is added to the Dynamic Data Set listed in Sections Q and V of the BSC. The result of this revision was that that no Alternative solution was required and therefore did not require any further development as mentioned in Section 4.

P297 and the Capacity Market work

A Workgroup member highlighted concerns that changes to data items listed in the Code (such as Dynamic Data items), may have an interaction with the Capacity Mechanism work currently being undertaken by the Department of Energy and Climate Change (DECC). The reason being is that DECC is referring to certain definitions and data items in the Code in draft legislation. If the BSC is changed then issues may arise if the areas cross referenced in legislation are no longer present or are moved.

The Group noted that this could have been a potential significant issue for P297 if, following further consideration the Proposer had not revised the Proposed solution. The Workgroup

member noted that while this potential issue has been resolved by the P297 Proposed solution there is a potential risk if other changes occur.

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

The Workgroup unanimously believes that P297 would better facilitate the achievement of:

- **Applicable BSC Objective (c)**, as it would ensure that the Dynamic Data Set published on the BMRS is the same as that submitted to, and used by, the Transmission Company. The Workgroup agreed that this will benefit BSC Parties as it will aid transparency around which Bids and Offers the Transmission Company has accepted into the Balancing Mechanism, thereby promoting effective competition in the generation and supply of electricity.

A small majority of the Workgroup also agreed that P297 would better facilitate the achievement of:

- **Applicable BSC Objective (d)**, because it will improve efficiency in ensuring that ELEXON is consistent with the Grid Code and the BSC systems are capable of processing and publishing the content and format of the new and revised Dynamic Data items.

The Workgroup therefore initially unanimously recommends that P297 is approved.

Assessment Consultation Question

Do you agree with the Workgroup's initial unanimous view that P297 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 D



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]

What are the Workgroup's views on whether P297 should progress as a Self-Governance Modification?

The Workgroup considered whether P297 could be progressed as a Self-Governance Modification.

Some members of the Workgroup had initially expressed concern that if the Proposed solution removed the Dynamic Data items from the BSC, this would be a material change and therefore would not meet the Self-Governance criteria. As set out in section 7, the Proposer revised his view of the Proposed solution so that the new Dynamic Data item is added to the Dynamic Data Set list in the BSC instead which resolved this area of concern.

However, the Workgroup reconsidered Self Governance again and agreed that there would be a material effect on competition (as covered by a)ii) of the Self-Governance criteria) as P297 would promote effective competition in generation and supply. The Workgroup also expressed the view that consumers (as covered by a)i) of the Self-Governance Criteria)

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would be impacted from a cost perspective. With these two matters in mind the Workgroup agreed that P297 should not be progressed under the Self-Governance provisions.

The Workgroup also noted that if P297 is progressed as a normal Modification Proposal then it is likely that the Authority will receive the Final Modification Report for P297 in parallel with any related Grid Code changes, which should mean that any final decision on P297 and the Grid Code changes are made at the same time.

Assessment Consultation Question

Do you agree with the Workgroup's views that P297 should not progress as a Self-Governance Modification?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment D



Self-Governance Criteria

A Modification Proposal that, if implemented:

a) is unlikely to have a material effect on:

i) existing or future electricity consumers; and

ii) competition in the generation, distribution or supply of electricity or any commercial activities connected with the generation, distribution, or supply of electricity; and

iii) the operation of the national electricity transmission system; and

iv) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and

v) the Code's governance procedures or modification procedures, and

b) is unlikely to discriminate between different classes of Parties.

Appendix 1: P297 Workgroup Details

Workgroup's Terms of Reference

P297 Terms of Reference	Reference
What changes are needed to BSC to support P297?	See section 3
Are changes needed to any Code Subsidiary Documents?	See section 3
What BSC System changes are required by P297?	See section 3
What are the benefits of P297?	See section 7
Does P297 better facilitate the Applicable BSC Objectives than the current baseline?	See section 7
Are there any Alternatives that should be considered?	See section 4

Assessment Procedure timetable

Proposed Progression Timetable for P297	
Event	Date
Present Initial Written Assessment to Panel	8 August 13
Workgroup meeting 1	19 August 2013
Workgroup Meeting 2	16 September 13
Assessment Procedure Consultation	3 - 24 October 13
Workgroup Meeting 3	w/c 28 October 13
Present Assessment Report to Panel	14 November 13
Report Phase Consultation (12 WD consultation)	15 November – 3 December 13
Present Draft Modification Report to Panel	12 December 13

Workgroup membership and attendance

Name	Organisation	19/08/13	16/09/13
David Barber	ELEXON (Chair)	✓	✓
Claire Anthony	ELEXON (Lead Analyst)	✓	✓
Robert Paterson	National Grid (Proposer)	✓	✓
Guy Phillips	E.ON UK	✓	✗
Gary Henderson	ScottishPower	☎	✓
Lisa Waters	Waters Wye Associates	✗	☎
Graham Bunt	EDF	✓	✓
Chris Gibson	RWE	☎	☎
Nicholas Brown	ELEXON (Legal)	✗	✓
John Lucas	ELEXON (Market Analysis and Design)	✓	✓
Zaahir Ghanty	ELEXON (Market Analysis and Design)	✗	✗
David Birchby	Ofgem	✓	✗
Adam Gilham	Ofgem	✗	✓