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1. Summary of Respondents

Company	Respondent	Number of BSC Parties represented	Names of BSC Parties represented	Number of non-Parties represented	Names of non-Parties represented	Role of Parties/non-Parties represented	Confidential
RWE Supply & Trading GmbH	Bill reed	10	WE Supply and Trading GmbH, RWE Npower plc, Great Yarmouth Power Ltd, Npower Cogen Trading Ltd, Npower Direct Ltd, Npower Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd	0	N/A	Supplier, Generator, Trader, Consolidator, Exemptable Generator, Party Agent	No
Scottish Power	Simon Reid	3	ScottishPower Generation Limited South Coast Power Limited Damhead Creek Limited			Generator, Trader, Supplier	No
EDF Energy	Martin Mate	10	EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Trading & Sales			Generator, Supplier, Party Agent, Consolidator, Exemptable Generator, Trader	No

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			Ltd; British Energy Generation (UK) Ltd				
Good Energy	Nick Haines	1	PURE	1		Supplier, Generator, Trader	No
****	Name supplied	1	****			Supplier, Generator	Anonymised
National Grid	Sally Lewis	1	National Grid				No
Intergen	Clara Anderson	4	InterGen Energy Trading Services Coryton Energy Company Limited Rocksavage Power Company Limited Spalding Energy Company Limited	0		Generator	No
Drax Power Limited	Cem Suleyman	1	Drax Power Limited			Generator	No
SSE plc	Andy Colley	8	SSE Energy Supply Ltd; SSE Generation Ltd; Keadby Generation Ltd; Medway Power Ltd; Uskmouth Power Company Ltd; Airtricity Ltd; Clyde Windfarm (Scotland) Ltd;	0		Supplier, Generator, Trader	No



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			Griffin Wind Farm Ltd				
VuePoint	Mark Taylor		VuePoint Solutions Ltd	1	BMRS system provider to several BSC Parties	BMRS system provider to several BSC Parties	No

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2. Responses

Question 1	Referring to the results of the survey in Appendix 2, does your company's experience tally with these results and are there any additional areas or priorities you believe we should consider?
RWE Supply & Trading	Our experience does tally. However, as an existing user of TIBCO we don't want to see removal of TIBCO but would welcome alternates.
Scottish Power	Yes. The responses summarised and published in Appendix 2 include areas of concern and interest to ScottishPower.
EDF Energy	<p>No. More transparency should be provided on the respondents and their comments, as would be the case for other modifications or changes.</p> <p>While we indicated support for development of BMRS and its interfaces, this was against a backdrop of continued use of High Grade links for critical business processes; expectation of opportunity to comment on detailed future approaches, and expectation of plentiful notice of changes. As a large and established company with multiple internal businesses we have many systems and business processes using BMRS data in different ways. Any BMRS developments should be made in a well-planned and publicised manner, with industry participants (who pay for the service) given full opportunity to contribute to the development process. We have concerns that major changes made unilaterally over a timescale of a few months prior to significant firm functional changes at the end of the year will involve changes that do not allow participants and users sufficient time to properly consider and accommodate those changes.</p> <p>No indication is given of the cost of the proposed development; or a quantified benefit, or the expected performance improvements. The cost of associated change/development by industry participants should also be taken into consideration.</p> <p>There are undoubtedly "independent" users, who are not BSC Trading Parties that pay for the service, who would be keen on more functionality. It is not clear that it is the role of Elexon and BSC Parties to provide third parties with free IT services at the expense of BSC Parties.</p> <p>Many recent "improvements" of industry central websites seem to have resulted in deterioration of performance and/or requirement for expensive user hardware/software upgrades even by those not using new functionality, and lukewarm reception. What assurance is there that the proposed changes will not reduce rather than improve website performance?</p> <p>In short, the full impacts are not clear.</p>
Good Energy	Yes, it is a very good summary of the current status of the service from Good Energy's point of view. It's a good service which is important to us, but it could be much better with a more dynamic interface and automated standardised data extraction.

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Question 1	Referring to the results of the survey in Appendix 2, does your company's experience tally with these results and are there any additional areas or priorities you believe we should consider?
****	<p>I believe there should be an API mechanism to obtain data. This would allow users to obtain the data and code it so they can display the data how they like in a spreadsheet. While there has been improvement on the website graphically for example day and day ahead imbalance, i cant then view from the website how example the imbalance has changed from the previous update. I think if there were an API mechanism it shouldn't bring back all the data, data could be split up into parts for example polling system prices wouldn't also bring back all the other data. But all separate areas of the website should be pollable. Wind forecasts, fuel mix etc all modular. One problem with TIBCO data is that there is too much data in a single file. This often slows down the database or spreadsheet on importing.</p> <p>Data should be pollable per power plant by date range, the current website is not suitable. Although you can script this from the elxon portal it is often too much data to deal with as you pull back everything.</p> <p>BMReports doesn't work with standard google chrome unless you 'add' add ons.</p> <p>API usage could be limited to Elxon registered signatories, the BM Reports website could be used for the casual user or those that have an interest. This may reduce burden on API polling.</p>
National Grid	<p>We agree that as a central point for publishing industry data, the functionality offered by BMRS is a valuable resource to the electricity industry and it is vital that it provides good, reliable service and performance for its customers. It would be useful to see any high level cost estimates associated with the items of functionality listed under suggested improvements in section 2.5 (of Appendix 2) to inform an assessment on how much value this delivers to customers (it may be that a pick and mix option of items provides optimal value against costs).</p>
Intergen	<p>Our experience tallies with the survey results – BMRS is a vital data source but is dated and difficult to navigate.</p> <p>We access BMRS almost constantly, mainly directly from the website and less regularly through scripting.</p> <p>This data is mission critical for real time market data.</p> <p>We support faster delivery of data and the creation of a dashboard that shows all market data from the most recent period / settlement day / previous settlement day i.e. to be able to configure views.</p> <p>Auto-uploading to excel / APIs would be helpful and would reduce the need for scripting.</p> <p>We support increased use of the Elxon Portal for historic data.</p> <p>In our experience the BMRS website is poorly laid out and navigation is difficult, in particular the inability to configure views.</p> <p>We would welcome participation in a trial of a new system.</p>
Drax Power Limited	N/A
SSE plc	Yes, SSE's experience echoes these results. Reliability and performance are crucial for effective analysis of the GB power system.



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Question 1	Referring to the results of the survey in Appendix 2, does your company's experience tally with these results and are there any additional areas or priorities you believe we should consider?
VuePoint	<p>As a provider of BMRS data feeds to a number of key players within the Energy Market we can validate some of the responses from the experience of how our customers currently use our system as a comparison to what you are proposing.</p> <p>The High cost of third party licencing to get and service the High Grade feed is one of the main reasons our customers procure our services. For less than the cost of these licences, customers can procure a system that provides and reports on the data near real time as well as historically, with additional value added services that we provide through the analysis and manipulation of the data. All this is provided as Software As a Service that does not need any local installation and works on any browser or access device.</p> <p>Many of our users integrate the data in to their own local spreadsheets for further analysis using our automated data feeds via our excel API. They also configure their own desktops containing the displays and table most relevant to their roles and needs via a drag and drop interface. Data is also pulled via our XML API for automated processing for inclusion in internal processes such as STP.</p> <p>We also provide an alternative high grade service that publishes the BMRS data via http/https with message queue handling, integrated data integrity checking and automated retransmission request, as well as database population scripts/schemas in multiple DB formats, all for an annual cost of the equivalent of the annual subscription fees for the High Grade line (with no additional licence costs).</p>

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Question 2a)	Do you have any views on the highlighted benefits and their benefit to your company and the industry a whole?
RWE Supply & Trading	Availability, Timeliness and data integrity should be the key benefits of any changes to the BMRA services
Scottish Power	It is important that all BM participants have reliable and timely access to cost-efficient near-realtime accurate data if they wish.
EDF Energy	<p>While benefits, both for provision of the service and users of the service, are clearly achievable, and certain changes would be of value to EDF Energy, we think BSC Parties should be given more detail on the proposals, and opportunity to suggest alternatives.</p> <p>It is unfortunate that this was not raised in a more timely manner, for example during impact assessment of P291, P295 or P297.</p>
Good Energy ****	<p>Good Energy agrees with all of the proposed benefit.</p> <p>Totally agree with reducing the lag between high grade and low grade users. Maybe only BSC signatories should have API access.</p>
National Grid	Given the key nature of the information published on the BMRS and its use by industry participants we feel that greater and easier data dissemination will provide overall industry benefits as well as promoting competition. Several of the future changes to the BMRS will result in it holding a greater volume of market information to be accessed by the wider market which underlines the importance of a robust delivery platform (these changes include: P291 REMIT 'inside information' and P295 (pending Authority decision) Transparency data).
Intergen	We fully support the proposed improvements.
Drax Power Limited	Please see answer to question 3c).
SSE plc	Improving the speed of access to BMRS data can only be a positive as it will support more efficient assimilation of information when taking operational and trading decisions.
VuePoint	<p>Any changes to the BMRS have an impact on all participants and their systems. The cost of this can be significant. By the use of more modern technologies and by using technologies "off the shelf", such development costs for CR's can be significantly reduced. We would expect the cost of the changes highlighted to be between 5 and possibly as high as 10 times lower than those published through using such systems massively reducing the WLC.</p> <p>As part of the strategy statement you state that you wish to move away from bespoke developments to more services "off the shelf". This would make sense as this is far more cost effective than bespoke systems. Some system providers may even provide changes to the systems as part of the overall cost of the system (ie within the annual subscription costs). This is particularly true for systems closely tied to the BMRS, as changes to the BMRS system have to be incorporated in to the "off the shelf" systems for their customer base, so even more savings can be achieved through using suppliers that specialise in this area rather than bespoke development. This is the model we employ very successfully with our users.</p>

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Question 2b)	Do you consider reducing the cost of changes to BMRS should be a priority for ELEXON?
RWE Supply & Trading	Yes – anything to reduce annual TIBCO costs and costs to implement change.
Scottish Power	Always. IT project complexity can often lead to increasing costs and de-scoping reducing the benefits delivered – this should be avoided.
EDF Energy	Yes, reducing the cost of changes to BMRS should clearly be a priority. However, complete re-design of the website will be expensive, and should not be undertaken in haste.
Good Energy	Yes, we are in a dynamic industry which is undergoing significant changes (26 pieces of separate legislation overall I believe) so a flexible solution is a must.
****	Of course, even though Elexon is self supporting, any business should be.
National Grid	It is important to ensure that flexibility is enabled in the BMRS system going forward, and changes can be made to it, at reasonable costs and with reduced lead times. If the associated costs and time taken to implement any necessary BMRS changes can be minimised without compromising the robust implementation of those changes then this will be valuable to the industry allowing the benefits of those changes to be captured earlier.
Intergen	We support Elexon's aim to provide value for money to the industry. We believe investment in a modernised BMRS represents value for money.
Drax Power Limited	It certainly should be considered.
SSE plc	Reducing the cost of change is advantageous, but should not come at the expense of accessible, reliable and timely provision of data. Any replacement system should match these expectations and not degrade current service standards in any way.
VuePoint	Any organisation that operates on the behalf of other organisations should look to provide the best and most cost effective service available. This is especially true in today's environment where reducing costs should be considered a priority. This is especially the case when such savings can be achieved through a simple, low risk, off the shelf solution, capable of fulfilling nearly all defined requirements out of the box, with minimum bespoke development required.

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Question 2c)	Do you have a view on what steps we should take to minimise the costs to BSC Parties who currently script but wish to move to directly calling data from our API?
RWE Supply & Trading	Being able to subscribe to web services would be useful.
Scottish Power	Scripting has never been encouraged by Elexon or the Electricity Industry generally. Partial mitigation of the cost implications of moving to alternatives to scripting could be achieved by Elexon adopting: <ul style="list-style-type: none"> • Good communications detailing alternatives and timescales, including deadlines; • A reasonable lead time for implementation of alternatives.
EDF Energy	High Grade users pay for the service they receive. Should users of "your" API (paid for by all BSC Parties) pay towards use of that service?
Good Energy	Run both systems in parallel for ~6 months to allow parties to test and integrate the new system into their processes, whilst using the current system for live operational processes in the meantime.
****	Not sure
National Grid	We are supportive of a BMRS move to API, since it would allow direct automated access to the raw data and is a more efficient way of accessing data intensive websites.
Intergen	Costs in terms of time resource could be minimised through clear communication of the changes as they happen and helpful procedures / descriptions for how users can access the data / APIs in the new system. We support the proposed single seamless site.
Drax Power Limited	n/a
SSE plc	Ensure that APIs are published at the earliest opportunity and well in advance of switch over to enable a stable, cost effective management of Party application redevelopment. Ensure that APIs are as simple and efficient as possible to support minimal cost outlay by Parties.
VuePoint	It is possible to provide low cost alternative solutions that can be easily adapted to provide the data in a more robust, timely, resilient and sustainable method that will not only improve the overall performance, but also ensure data integrity.

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Question 3a)	In order to minimise risk, we propose a phased approach to the deployment of the new Low Grade Platform; do you have any views on this approach?
RWE Supply & Trading	Happy with phased approach as long as it covers the key requirement of improved Availability for REGULATORY reporting.
Scottish Power	This approach seems appropriate.
EDF Energy	Reliability and performance of the existing system should not be compromised.
Good Energy	Your approach is logical and sensible, but I can't comment on whether its realistically achievable within the timeframe.
****	Phased may well be better, as the website will be more modular for further updates in the future affecting only one part rather than all of the website.
National Grid	The phased approach seems sensible providing that any extra costs that might be incurred from phasing implementation are assessed and minimised.
Intergen	We support this in order to minimise disruption / risk of failure in the current system.
Drax Power Limited	n/a
SSE plc	This seems a sensible approach.
VuePoint	The provision of these changes can be achieved in much shorter timeframes, for lower costs, whilst also enabling those that do not wish (or do not have the funds available) to migrate to continue to operate using their current applications and data feeds.

Question 3b)	We propose the first phase of the programme be limited to introducing the pending regulatory changes mandated by modifications P291 and P295; do you have any views on this?
RWE Supply & Trading	These are the highest priority for us.
Scottish Power	This approach seems appropriate.
EDF Energy	If this limits the risk of unintentional or consequential effects on the reliability, performance and cost of the existing system, then we support it.
Good Energy	As above
****	N/A
National Grid	As implementation of P291 and recommended implementation of P295 have been determined for Dec 2014, a robust deployment of the solutions for Dec 2014 seems appropriate (depending on any extra costs associated with a phased approach).
Intergen	It is our opinion that improved access to the most commercially critical data should be prioritised.
Drax Power Limited	n/a
SSE plc	It would seem sensible to introduce these changes and prove the resilience of the system before introducing any further amendments.
VuePoint	Considering the cost of the proposed changes and the impact these changes will have on the participants, it does not make financial sense to go through two sets of changes incurring two development costs for the participants. In addition the proposal is effectively delaying improvements to performance and services for over 1 year, despite the current performance issues documented, and being used as the justification for change. For less than the cost of the proposed change requests detailed above, a solution can be sourced, in a much shorter timescale that will provide all the services to satisfy the requirements stated not only for these

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Question 3b)	We propose the first phase of the programme be limited to introducing the pending regulatory changes mandated by modifications P291 and P295; do you have any views on this?
	CR's but also all other suggested requirement changes.

Question 3 c)	We propose that the TIBCO interface through the High Grade Service should remain to provide uninterrupted service to support current TIBCO users. Do you have any views on this approach?
RWE Supply & Trading	Agree with this as long as it continues to be provided with optionality to subscribe (or not) to new messages. Also would welcome Elexon seeking cost reductions from TIBCO for support.
Scottish Power	This approach seems appropriate.
EDF Energy	Uninterrupted TIBCO service is absolutely essential, and unless consultation indicates there is no requirement for the new published data items to be available through TIBCO, then they should be. The TIBCO service should only be interrupted or halted following consultation with BSC Parties, and with considerable notice.
Good Energy	Your approach is logical and sensible.
****	An Uninterrupted service may be better at a premium, but the lag between high and low update should be closed.
National Grid	The National Grid Control Room use the High Grade system to enable swift identification of manifest errors and we consider it essential that TIBCO remains available.
Intergen	We would wish to retain the high grade service as our main data source and do not support the removal of the high grade service in the short term Once the low grade service has been improved to the point that it is delivering at the same level as the high grade service, then the high grade service should be phased out. This would represent value for money to all users as the existing low grade users would have access to a better service and the existing high grade users would save on subscription.
Drax Power Limited	Our main comments on the consultation relate to the interaction between the development of a new Low Grade Platform and the existing High Grade TIBCO Service. Whilst we agree that there are potential benefits associated with the introduction of a new Low Grade Platform, we believe that the new platform should only be developed on the condition that there is data equivalence between the new platform and the High Grade service. Specifically, the data provided on the new platform must be the same as that provided through the High Grade service. Moreover, the High Grade service must be maintained at the same quality of service as currently provided i.e. provide almost instant data updates. Drax currently uses TIBCO to provide real-time information about what is going on in the industry. We have applications which check data provided by us to ensure all our submissions are successful. We also have applications monitoring what is happening on the system to look for opportunities and periods to minimise risk. We also store the data for long term analysis of trends. We capture all the data provided by the system. In short, TIBCO is currently vital to Drax's business operations. If the new platform was maintained to a higher standard or had additional data items / quicker refresh rates relative to the High Grade Service, then Elexon must consider the future validity of maintaining the High Grade Service. In this scenario, it is likely that Drax would be incentivised to transition to the new platform for its data requirements. In order to be effective, this solution may require second by second data scraping, which is unlikely to be the most efficient IT solution from either the perspective of Drax's systems or the potential impact on the platform itself, particularly if multiple parties take this approach. Furthermore, if there is a mass-migration to the most up-to-date and reliable data source, the High Grade Service could prove

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Question 3 c)	We propose that the TIBCO interface through the High Grade Service should remain to provide uninterrupted service to support current TIBCO users. Do you have any views on this approach?
	very expensive to service for only a small group of BSC Parties. For the reasons provided above, we believe that a project to develop a new Low Grade Platform should only be initiated if it is consistent with maintaining the High Grade service at an equivalent standard, otherwise a further appraisal on the validity and cost of supporting both platforms may be required.
SSE plc	SSE agree that the TIBCO service should not be withdrawn until the new platform is proven to deliver expected benefits.
VuePoint	This can be achieved whilst delivering a new alternative delivery mechanism. It is also possible to deliver messages in a TIBCO like format indefinitely if required whilst also introducing a better service with message integrity and automated back filling, so that those that have made the large investment in TIBCO can continue to operate whilst still reducing the overall system cost.

Question 3d)	We are proposing a more technically and economically advantageous solution to data integration, which would offer an alternative to screen scraping. If your organisation currently uses screen scraping would you consider using this alternative approach?
RWE Supply & Trading	Would consider alternate approach.
Scottish Power	Not applicable, however we would consider any new solution on offer.
EDF Energy	Yes, subject to details.
Good Energy	Yes, Good Energy would prefer to use an API as it is more structured, more efficient and less susceptible to errors.
****	Screen scraping is a cumbersome method of extracting data, sometimes with translational errors. We would approve an API approach
National Grid	More information regarding the proposed solution would be useful but if a better option such as API was made available it is likely that more users would be inclined to take this approach.
Intergen	Yes. We would prefer to use auto-upload to excel / APIs.
Drax Power Limited	n/a
SSE plc	SSE would consider using an alternative approach to screen scraping, which will impact certain applications currently used, so it is crucial that ELEXON provide early disclosure of full specifications in order to allow redevelopment of applications, with plenty of time to manage any cutover arrangements.
VuePoint	n/a



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Question 4	Do you have any views on the above steps and timescales?
RWE Supply & Trading	We have no issues with the timescales.
Scottish Power	No
EDF Energy	See earlier comments.
Good Energy	When will beta users be able to test and feedback on the performance and suitability of the new solution?
****	No Comments
National Grid	The steps appear sensible. As we progress into 2014 and any further system requirements from modifications are determined (e.g. P297), the timescales for implementation of Phase 2 may require review.
Intergen	Our preference would be for phase 1 to be completed prior to the start of the winter EFA product to ensure all users are able to access the improved service prior to the peak of the market.
Drax Power Limited	n/a
SSE plc	See previous comments above on allowing sufficient disclosure to allow Parties to redevelop their applications' interaces, otherwise this seems fine.
VuePoint	This appears to be exceptionally long time frame to deliver improvements that are urgently required especially when potentially better, more cost effective services can be procured in much shorter timeframes.