

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

P315 'Publication of Gross Supplier Market Share Data'

P315 aims to increase transparency of Suppliers' Metered Volumes and MPAN counts to give industry participants more equal access to basic market share information.

Under P315, Suppliers' market share would be identified and reported (unless it is below a defined threshold in both the domestic and non-domestic sectors) and non-Supplier specific GSP Group consumption total information would be made more widely available.

In addition the Alternative Modification would make available some historical GSP Group consumption totals information and some Supplier-specific information in an aggregated form.

This Assessment Procedure Consultation v3.0 for P315 closes:

5pm on Thursday 23 July 2015

The Workgroup may not be able to consider late responses.



The P315 Workgroup initially recommends **approval** of the P315 Alternative Modification

This Modification is expected to impact:

- Suppliers
- ELEXON

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About This Document

The purpose of this P315 Assessment Procedure Consultation v3.0 is to invite BSC Parties and other interested parties to provide their views on the merits of P315. The P315 Workgroup will then discuss the consultation responses, before making a recommendation to the BSC Panel at its meeting on 13 August 2015 on whether or not to approve P315.

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.
- Attachments A and B contain the draft redlined changes to the BSC to deliver P315 Proposed Modification and P315 Alternative Modification.
- Attachment C 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.
- Attachment D contains the Workgroup's analysis on Summary Market Share Data reporting thresholds.

P315
Assessment Procedure
Consultation v3.0

3 July 2015

Version 1.0

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Why Change?

The Proposer believes that the Supplier Metered Volume data that is currently available to the market participants does not provide sufficient transparency for interested parties (including prospective new entrants) to understand Suppliers' market shares in the retail and embedded generation markets. [P315 'Publication of Gross Supplier Market Share Data'](#) proposes that more granular Supplier market share data should be made available to improve market transparency and promote effective competition.

Proposed Modification Solution

The Proposed Modification solution consists of two parts:

- **Publication of Supplier Market Share Summary Data**

ELEXON shall publish a quarterly summary of each Supplier's market share by volume and average MPAN count on the ELEXON website. The data should be drawn from the First Reconciliation Volume Allocation (R1) Run and would be reported on a national level and across a set of Consumption Reporting Groups¹.

Data relating to any Suppliers with a small market share (i.e. below the reporting thresholds as described in Section 3) in both domestic and non-domestic markets would not be published individually. Instead, these Suppliers' data would be aggregated together across all the Consumption Reporting Groups and reported as 'Other Suppliers'.

- **Publication of D0276 'GSP Group Consumption Totals Report' data as P0276²**

The P0276 data would contain volumes and MPAN counts for each GSP Group Consumption Component Class (CCC), but not broken down by Profile Class (PC). For the avoidance of doubt, this report exposes no data on the market share of Suppliers and is already available to BSC Parties active in the SVA arrangements.

ELEXON shall publish the daily P0276 data flow for all Settlement Run Types from the P315 Implementation Date going forward on the ELEXON Portal and make this available to the Transmission Company. Non-BSC Parties can access this data under a licensing agreement.

This data will be archived from the Implementation Date onward for a period as determined appropriate by the Workgroup and will be available on request within the archive period.

¹ Consumption Reporting Groups were referred as Aggregate Consumption Component Classes (ACCCs) in the previous P315 documents. They have been renamed for the avoidance of technical contradiction between Consumption Component Class and Profile Class. Consumption Reporting Groups are defined in Annex 1.

² P0276 contains the same data as D0276 'GSP Group Consumption Totals Report'. However the flow was renamed to clarify that this data would be published on the ELEXON Portal rather than transmitted through Data Transfer Network.

Alternative Modification Solution

The Alternative Modification solution contains three parts:

- **Publication of Supplier Market Share Summary Data** (same requirements as the Proposed Modification)
- **Publication of P0276 data**

The Alternative Modification contains the same requirements as the Proposed Modification and in addition, would make historical P0276 available. P0276 data would therefore be archived from a date that is to be determined but will not exceed two years before the P315 Implementation Date, and onward from P315 implementation for a period as determined appropriate by the Workgroup, and will be available on request within the archive period.

- **Publication of GSP Group Market Matrix Report**

The Market Matrix Report would contain GSP Group consumption data by PC, Standard Settlement Configuration (SSC), Line Loss Factor Class (LLFC), Distributor and Time Pattern Regime (TPR). The report shall be created by aggregating D0082 'Supplier Purchase Matrix Report' data for all Suppliers. For the avoidance of doubt, this report exposes no data on the market share of suppliers.

ELEXON shall publish a new daily GSP Group Market Matrix Report for all Settlement Run Types on the ELEXON Portal. This report will be available to BSC Parties and to non-BSC Parties under a licensing agreement.

Impacts & Costs

There would be no direct impact on BSC Parties to implement P315. The central implementation costs for ELEXON would be approximately £80k and £104k to implement the Proposed Modification and Alternative Modification respectively.

Implementation

The Workgroup recommends following Implementation Dates:

- 30 June 2016, if the Authority's decision is received on or before 22 October 2015; or
- 3 November 2016 if the Authority's decision is received after 22 October 2015 but on or before 25 February 2016.

Recommendation

The Workgroup unanimously believes that both the Proposed and Alternative Modifications better facilitate Applicable BSC Objectives (b) and (c) compared with the baseline, and unanimously believes that the Alternative Modification is better than the Proposed Modification.

The Workgroup therefore unanimously recommends that the P315 Alternative Modification should be approved.

2 Why Change?

The P315 Proposer contends that Suppliers' Metered Volume data that is currently published does not provide sufficient transparency for all BSC Parties or other interested parties to understand the market shares in the electricity retail market.

The Proposer believes that, in order to help all parties to understand the gross Supplier market shares, Suppliers' Meter Volume should be published, and that the volumes to be published should be gross (i.e. be separated out from embedded generation) and be broken down by Supplier names, customer types, Active Export/Active Import and Half Hourly (HH)/Non Half Hourly (NHH).

After considering the industry responses to the previous consultations, the Proposer believes that small Suppliers with low market shares in both domestic and non-domestic markets should be anonymised in the P315 reporting. This would create the right balance between improving market transparency and protecting the growth of small market participants in their niche markets.

P315 contends that publishing the data would be in the interests of competition, would aid the validation of Settlement data and would help the Transmission Company balance the system³.

What is currently published?

SAA-I014 Settlement Reports

The SAA-I014 reports Supplier Metered Volume, i.e. the net of import and export Metering Point Administration Numbers (MPANs) for all PCs including line losses. The process of netting off export volumes means that gross Supplier consumption can be 'masked' by embedded generation within the same Supplier Balancing Mechanism Unit (BMU). With an increasing volume of embedded generation this effect will increase.

Different versions (sub flows) of the SAA-I014 contain different information and are currently sent to, or available to, different participants.

1. Individual BSC Party version ([SAA-I0141](#))

Each BSC Party receives the SAA-I0141 containing only their data.

2. System Operator version ([SAA-I0142](#))

BSC Parties and non BSC Parties who have purchased a data licence from ELEXON can request the SAA-I0142 containing all BSC Parties' data.

3. BSCCo version ([SAA-I0143](#))

BSCCo receives the SAA-I0143 which contains a subset of data from SAA-I0142 and this data flow is available to BSCCo only.

D0276 GSP Group Consumption Totals Report

Suppliers also receive [Data Transfer Catalogue](#) (DTC) data flow [D0276](#) which reports volumes and MPAN counts for each GSP Group CCC. However this data flow does not

³ The Modification solution would provide gross Supplier Volume with Supplier BMU embedded generation separated out. The Transmission Company believes that this data would be beneficial for its demand forecasting and charge setting activities.

provide visibility of volumes broken down by PCs. This limitation means that Parties are not be able to see the volumes consumed by different types (or PCs) of customers. The D0276 is also restricted to BSC Parties that participate in the SVA arrangements only.

What is the issue?

The Proposer believes that neither the SAA-I014 nor D0276 provide sufficient transparency to allow all BSC Parties and other interested parties (such as potential new entrants) to understand Suppliers' gross consumption within the retail market, nor is it presented in a user friendly format. The Proposer believes such transparency should exist in order to enable Parties and potential new market entrants to understand the market shares for each market participant.

Currently, third parties perform surveys to establish market share and sell this information to industry stakeholders. The Proposer understands that there have been cases where gross market share information has been released with Suppliers' consent in response to Freedom of Information Requests to Ofgem and he believes that there is no issue in principle with this information being made available to industry in basic form, without Parties having to incur extra costs.

Proposed Modification Solution

The Proposed Modification solution consists of two parts:

- **Publication of Supplier Market Share Summary Data**

ELEXON shall publish a quarterly summary of each Supplier's market share by volume and average MPAN count on the ELEXON website. The data would be reported:

- Across a set of Consumption Reporting Groups introduced by P315 and would use data from the R1 Run ; and
- At a national level only, i.e. not broken down by GSP Group.

However, data relating to any Suppliers considered to have a small market share would not be published individually. Suppliers with a market share that falls below both a defined domestic MPAN count threshold and a defined non-domestic consumption volume threshold would be aggregated together and reported as 'Other Suppliers' across all the Consumption Reporting Groups in the report. Therefore, a Supplier would be identified and have its data reported individually if it has either (or both):

- An average number of PC1-2 MPANs over the reporting quarter of 250,000 or more; or
- An aggregated PC3-8 and Half Hourly (HH) consumption volume over the reporting quarter of 500GWh or more.

These thresholds equate to approximately 1% of the respective domestic and non-domestic market shares.

- **Publication of D0276 'GSP Group Consumption Totals Report' data as P0276**

ELEXON shall publish the daily P0276 data flow for all Settlement Run Types from the P315 Implementation Date going forward on the ELEXON Portal and make this available to the Transmission Company. Non-BSC Parties can access this data under a licensing agreement.

This data will be archived from the Implementation Date onward for a period as determined appropriate by the Workgroup and will be available on request during the archive period. The archive will be on a rolling basis, such that when data for a new quarter is added to the archive it will replace the oldest quarter's data, i.e. first in, first out.

P315 Proposed Modification solution requirements

Requirement 1

Publish quarterly data on Supplier volumes and MPAN counts on the ELEXON website.

- | | |
|-----|--|
| 1.1 | For each calendar quarter (January - March, April - June, etc.) the Supplier |
|-----|--|

Requirement 1	
	<p>Volume Allocation Agent (SVAA) will determine:</p> <ul style="list-style-type: none"> Quarterly aggregated Supplier volumes in MWh by Consumption Reporting Groups; and Quarterly averaged Supplier MPAN counts by Consumption Reporting Groups for each Supplier at a GB level, using R1 data. <p>This data will be sent to ELEXON after all the relevant R1 Runs have been completed by the SVAA.</p>
1.2	<p>ELEXON will group Suppliers IDs into Supplier Party name as necessary across the relevant Consumption Reporting Groups.</p> <p>The following threshold criteria will be applied to the information determined after the grouping of Supplier IDs:</p> <ul style="list-style-type: none"> For non-domestic market segment (all PC3-4, PC5-8 and HH import) a volume threshold of 500GWh; and For domestic market segment (PC1-2) an MPAN count threshold 250,000. <p>A Supplier below both the criteria values is considered to be below the publication threshold (i.e. a Supplier's data would be published if it is above either threshold).</p> <p>ELEXON will produce the Supplier quarterly market share summary by adding CVA import volumes to the quarterly Supplier volumes for each Supplier.</p>
1.3	<p>The Supplier quarterly market share summary will be:</p> <ul style="list-style-type: none"> Published by ELEXON on the ELEXON website within 10 business days of receiving the data (as described in 1.1) from the SVAA. Downloadable as a csv file. <p>Information for all Suppliers below the publication thresholds in Requirement 1.2 will be combined and published and included in the csv file as 'Other Suppliers'.⁴</p>
1.4	<p>The information published will be publicly available to all BSC Parties and non-BSC Parties (no data licence or fee will apply).</p>
1.5	<p>A disclaimer relating to the information published under this requirement will be included on the ELEXON website to protect ELEXON from any commercial liabilities that may arise from its use.</p>

Requirement 2	
Report daily P0276 data on the ELEXON Portal.	
2.1	<p>The SVAA will produce a daily 'P0276' report which will contain the same contents as the D0276 flow, for all Run Types, but will not contain a recipient Supplier ID and will not be a DTC D-flow (therefore renamed as</p>

⁴ Section 7 explains how P315 will be implemented if the Implementation Date falls mid way in a reporting quarter.

Requirement 2	
	P0276).
2.2	The SVAA will publish the P0276 report on the ELEXON Portal on a daily basis.
2.3	The SVAA will send the P0276 report to National Grid on a daily basis.
2.4	The SVAA will archive all P0276 data from the Implementation Date and going forward for a period to be determined (the archive period), and on a rolling basis.
2.5	All BSC Parties would have the right to access this report (including historical reports within the archive period).
2.6	Any non-BSC Party would have the right to access this report (including historical reports within the archive period) upon agreeing the relevant data licence agreement and paying the associated fee (<i>see Section 3</i>).

Alternative Modification Solution

The Alternative Modification solution contains three parts:

- **Publication of Supplier Market Share Summary Data** (same requirements as the Proposed Modification)
- **Publication of P0276 data**

As for the Proposed Modification, ELEXON shall publish the daily P0276 data flow for all Settlement Run Types from the P315 Implementation Date going forward on the ELEXON Portal and make this available to the Transmission Company. Non-BSC Parties can access this data under a licensing agreement. Any P0276 data that is published from the Implementation Date and onward should be archived for a period as determined appropriate by the Workgroup and be made available on request within the archive period.

Under the Alternative Modification P0276 data would be archived from a date that is to be determined but will not exceed two years before the P315 Implementation Date, and onward from P315 implementation for a period as determined appropriate by the Workgroup, and will be available on request within the archive period. The archive will be on a rolling basis, such that when data for a new quarter is added to the archive it will replace the oldest quarter's data, i.e. first in, first out.

- **Publication of GSP Group Market Matrix Report**

ELEXON shall publish a new daily GSP Group Market Matrix Report for all Settlement Run Types that contains D0082 data aggregated for all Suppliers on the ELEXON Portal. This report will be available to BSC Parties and to non-BSC Parties under a licensing agreement. This report will be archived from the Implementation Date for a period as determined appropriate by the Workgroup.

P315 Alternative Modification solution requirements

Requirement 1	
Publish quarterly data on Supplier volumes and MPAN counts on the ELEXON website.	
1.1	<p>For each calendar quarter (January - March, April - June, etc.) the Supplier Volume Allocation Agent (SVAA) will determine:</p> <ul style="list-style-type: none"> • Quarterly Supplier aggregated volumes in MWh by Consumption Reporting Groups; and • Quarterly averaged Supplier MPAN counts by Consumption Reporting Groups; for each Supplier at a GB level, using R1 data. <p>This data will be sent to ELEXON after all the relevant R1 Runs have been completed by the SVAA.</p>
1.2	<p>ELEXON will group Suppliers IDs into Supplier Party name as necessary across the relevant Consumption Reporting Groups.</p> <p>The following threshold criteria will be applied to the information determined after the grouping of Supplier IDs:</p>

Requirement 1	
	<ul style="list-style-type: none"> For non-domestic market segment (all PC3-4, PC5-8 and HH import) a volume threshold of 500GWh; and For domestic market segment (PC1-2) an MPAN count threshold 250,000. <p>A Supplier below both the criteria values is considered to be below the publication threshold (i.e. a Supplier's data would be published if it is above either threshold).</p> <p>ELEXON will produce the Supplier quarterly market share summary by adding CVA import volumes to the quarterly Supplier volumes for each Supplier.</p>
1.3	<p>The Supplier quarterly market share summary will be:</p> <ul style="list-style-type: none"> Published by ELEXON on the ELEXON website within 10 business days of receiving the data (as described in 1.1) from the SVAA. Downloadable as a csv file. <p>Information for all Suppliers below the publication thresholds in Requirement 1.2 will be combined and published and included in the csv file as 'Other Suppliers'4.</p>
1.4	The information published will be publicly available to all BSC Parties and non-BSC Parties (no data licence or fee will apply).
1.5	A disclaimer relating to the information published under this requirement will be included on the ELEXON website to protect ELEXON from any commercial liabilities that may arise from its use.

Requirement 2 (same as Proposed Modification except for requirements 2.4 and 2.5)	
Report daily P0276 data on the ELEXON Portal.	
2.1	The SVAA will produce a daily P0276 report which will contain the same contents as the D0276 flow, for all run types, but will not contain a recipient Supplier ID and will not be a DTC D-flow (therefore renamed as P0275).
2.2	The SVAA will publish the P0276 report on the ELEXON Portal on a daily basis.
2.3	The SVAA will send the P0276 report to National Grid on a daily basis.
2.4	Upon implementation, the SVAA will produce historical P0276 reports dating back to two years from the Implementation Date.
2.5	The SVAA will archive all P0276 data, including historical P0276 reports for a period before the Implementation Date that is to be determined but which will not exceed two years and any new P0276 reports produced from the Implementation Date for a period to be determined (the archive period), on a rolling basis.
2.6	All BSC Parties would have the right to access this report (including historical reports within the archive period).
2.7	Any non-BSC Party would have the right to access this report (including historical reports within the archive period) upon agreeing the relevant

Requirement 2 (*same as Proposed Modification **except for requirements 2.4 and 2.5***)

data licence agreement and paying the associated fee (*see Section 3*).

Requirement 3

Report daily GSP Group Market Matrix Report on the ELEXON Portal.

3.1	The SVAA will produce a daily GSP Group Market Matrix Report which will contain D0082 data aggregated for all Suppliers for all Settlement Run Types, but will not contain Supplier IDs and will not be a DTC D-flow.
3.2	The SVAA will publish the GSP Group Market Matrix Report on the ELEXON Portal on a daily basis.
3.3	The SVAA will archive all GSP Group Market Matrix Reports from the Implementation Date and going forward for a period to be determined.
3.4	All BSC Parties would have the right to access this report.
3.5	Any non-BSC Party would have the right to access this report upon agreeing the relevant data licence agreement and paying the associated fee (<i>see Section 3</i>).

Assessment Consultation Question

Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P315 which would better facilitate the Applicable BSC Objectives?

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

This section summarises the disclaimer and licencing provisions and the BSC changes for P315. A more detailed explanation of the legal text changes can be found in Appendix 4.

Legal disclaimer and P315 data licence

The legal disclaimer for the quarterly market share published on the ELEXON website and the P315 data licence for the data reported on the ELEXON Portal will be developed as part of implementation of P315, if approved.

Disclaimer (Requirement 1 for both Proposed and Alternative Modifications)

A disclaimer on the ELEXON website relating to the P315 data would limit ELEXON's liability for any commercial use of the data under Requirement 1. The disclaimer would also state that the data cannot be used or reproduced except with the prior written consent of ELEXON.

This reflects the approach in use for the BMRA data available on the [BM Report](#) website.

Data licence (Requirement 2 for the Proposed Modification, Requirements 2 and 3 for the Alternative Modification)

Non-BSC Parties would only be able to access P315 data reported on the ELEXON Portal if they agree a P315 data licence and pay the applicable fee.

BSC Parties will be able to access the P315 Portal data without agreeing a data licence and without paying a fee.

- **Data licence agreement**

The P315 data licence agreement would allow non-BSC Parties to access the data while imposing limits on the use of the data and indemnifying ELEXON. The licence would reflect the approach under previous reporting Modification P114 '[Entitlement of Licence Exemptible Generators \(LEGs\) and other Non-trading Parties to BSC Membership Without Evidence of Trading](#)', which introduced a licence to allow non-BSC Party licensees to make use of the P114 data⁵. The P315 data licence would be separate to the P114 data licence.

- **Data licence fee**

Non-BSC Parties would also have to pay a fee associated with the P315 data licence in order to access the relevant data. Though the P315 data licence and P114 data licence would be separate, a single fee would apply to both. Existing P114 data licensees who have paid the fee for P114 data would not incur an additional cost for P315 data for the relevant licensed period, but would be required to agree the P315 data licence conditions.

Upon implementation of P315 the fee to license both P114 and P315 data would be £3,000 per annum, which is the current licensing fee for P114 data only. This figure reflects the principle established under P114 which non-Parties pay a fee to access data that is equivalent to a year's BSC Party Base Monthly Charge (see BSC Annex D-3 3.1(a)), set at £250 per month.

⁵ SAA-I0142, CDCA-I0422, CDCA-I0291 and CDCA-I01301, AKA 'P114 data'.

The rationale for this licence fee is to recover development and operational costs of the Modification. The combined P114/P315 licence fee may therefore be adjusted (i.e. reduced) in future, to ensure it remains appropriate for this purpose.

Legal text for proposed solution

The P315 Proposed Modification solution would require changes to BSC Section V 'Reporting' to introduce reporting requirements for BSCCo and the SVAA to publish the quarterly Supplier Market Share Summary Data and P0276 files on the ELEXON website and the ELEXON Portal respectively.

A new paragraph would be introduced into Annex S-2 'Supplier Volume Allocation Rules' to define the mathematical methodology which the SVAA shall use to generate Supplier Market Share Summary Data.

BSC Section X Annex X-1 'General Glossary', Annex X-4, Annex X-5 Annex X-6 and Annex X-7 would be updated to include the newly defined terms and their descriptions.

A new Annex X-9 would be introduced to include further technical properties used in Annex X-1.

Note that any redlined changes to the relevant Code Subsidiary Documents will be provided as part of the implementation of P315 Proposed Modification, if it is approved.

The proposed redlined changes to the BSC can be found in Attachment A. A detailed explanation of legal text changes can be found in Appendix 4.

Assessment Consultation Question

Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of P315 Proposed Modification?

Please provide your rationale.

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

Legal text for alternative solution

The P315 Alternative Modification solution would require the same changes to the BSC as the Proposed Modification solution, with the addition that the requirement to report the GSP Group Market Matrix Report on the ELEXON Portal would also be introduced to Section V 'Reporting'.

The proposed redlined changes to the BSC can be found in Attachment B. A detailed explanation of legal text changes can be found in Appendix 4.

Assessment Consultation Question

Do you agree with the Workgroup that the draft legal text in Attachment B delivers the intention of P315 Alternative Modification?

Please provide your rationale.

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

Estimated central implementation costs of P315

The estimated central implementation costs for the Proposed Modification and Alternative Modification are £80k and £104k respectively.

The estimated lead time to implement the Proposed Modification and Alternative Modification are 29 weeks and 36 weeks respectively.

P315 industry costs

No costs identified for BSC Parties to implement P315. There could be costs to Parties if they decide to further analyse or process the data, but this is not a mandatory requirement of P315 implementation.

P315 impacts

Impact on BSC Parties and Party Agents

Party/Party Agent	Impact
BSC Trading Parties	<p>No direct impacts on BSC Parties to implement either the Proposed Modification or the Alternative Modification as there will be no system changes required.</p> <p>There may be impacts if BSC Parties wish to further analyse or process the data provided.</p>

Impact on Transmission Company

There would be minimal impacts on the Transmission Company to establish a process to receive the data published under P315.

Impact on BSCCo

Area of ELEXON	Impact
BSC Operations	<p>Data processing would be required to derive the Supplier quarterly market share summary:</p> <ul style="list-style-type: none"> • Further group Supplier IDs into Supplier Party name as necessary. • Apply the reporting thresholds as described in Section 3 and identify Suppliers whose market shares are below the thresholds and further aggregate their Consumption Reporting Group data as 'Other Suppliers'. • Obtain Supplier CVA import volumes from SAA-I0143 for the relevant reporting quarter using the R1 data. • Add CVA import volume to the Consumption Reporting Group volumes for each Supplier to derive the Supplier market share summary. <p>BSC Operations would need to set up the website publication process.</p>

Impact on BSC Systems and process	
BSC System/ Process	Impact
SVAA	<p>Under both the Proposed Modification and the Alternative Modification:</p> <ul style="list-style-type: none"> • The SVAA will be required to provide quarterly Consumption Reporting Group volumes in MWh and averaged MPAN counts for all Supplier IDs to ELEXON. • The report should be sent to ELEXON as soon as practically possible after the relevant R1 Run has taken place. • The SVAA shall produce the relevant daily P0276 file with no recipient Supplier ID section of the file header, for all Run Types and publish these files on the ELEXON Portal. • The SVAA shall send the daily unzipped P0276 file to the Transmission Company via ftp. <p>Under the Alternative Modification:</p> <ul style="list-style-type: none"> • In addition to the above, the SVAA shall create a new GSP Group Market Matrix Report for all Settlement Run Types that contains Suppliers aggregated D0082 data. Therefore Supplier IDs will not be shown in these files. • The SVAA will be required to publish this new report on the ELEXON Portal. • The SVAA will be required to publish historical P0276 files on the Portal and/or make them available upon request.

Impact on Code	
Code Section	Impact
Section V	Changes in Section V will be required to implement this Modification. Draft legal text to deliver the Proposed Modification and Alternative Modification are included in Attachments A and B respectively.
Section S	Change in Annex S-2 will be required to implement this Modification. Draft legal text to deliver the Proposed Modification and Alternative Modification are included in Attachments A and B respectively.
Section X	Changes in Annex X-1, X-4, X5, X6, X7 and X9 will be required to implement this Modification. Draft legal text to deliver the Proposed Modification and Alternative Modification are included in Attachments A and B respectively.

Impact on Code Subsidiary Documents	
CSD	Impact
BSCP508	Changes will be required to reflect the data publication. ELEXON will produce the redlined changes to BSCP508 as part of P315 implementation, if it is approved.

Impact on other Configurable Items	
Configurable Item	Impact
SVAA Service Description and URS	Changes will be required to reflect the changes to processes. ELEXON will produce the redlined changes to these documents as part of the P315 implementation, if it is approved.

7 Implementation

Recommended Implementation Date

The Workgroup recommends the following Implementation Date for both P315 Proposed Modification and P315 Alternative Modification:

- 30 June 2016 if the Authority's decision is received on or before 22 October 2015; or
- 3 November 2016 if the Authority's decision is received after 22 October 2015 but on or before 25 February 2016.

Assessment Consultation Question

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

Please provide your rationale.

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

Implementation Approach

For both the Proposed and Alternative Modifications, if the Implementation Date falls back to 3 November 2016, the quarterly market share for Q4 2016 will be pro-rated up for the whole quarter based on the data available from the Implementation Date to the end of the quarter, i.e. first publication would be mid-March 2017, reporting on the period of Q4 (October - December) 2016 based on data for 3 November 2016 - 31 December 2016.

This issue does not arise if either the Proposed or Alternative Modification is approved with an Implementation Date of 30 June 2016.

Preceding assessment of P315

P315 has undergone a significant amount of assessment prior to this consultation, and the relevant documents can be found on the P315 page of the [ELEXON website](#), including the following:

- The initial industry consultation, seeking views on potential P315 solutions;
- The initial Assessment Report, recommending to the BSC Panel that the Alternative Modification should be approved;
- The second industry consultation, following P315 being sent back into Assessment, seeking views on the Proposed and Alternative Modifications and concerns raised around commercial sensitivity of the data to be published, justification for the Modification and potential impacts on competition.

The second industry consultation set out the Panel's reasons for sending P315 back into Assessment and the Workgroup's assessment of P315, including its consideration of industry participants' initial concerns - the relevant sections of the consultation document are included in Appendix 1 for reference.

Following the latest discussions an attendee to the Workgroup meetings noted some points that he believed to be relevant to the commercial sensitivity and case for change:

- Smaller Suppliers concerned about being able to process data resulting from P315 could pay third parties to summarise data for them.
- Ofgem publishes market share data under Freedom of Information requests, but must get Suppliers' permission to do so; P315 would make information available to the market without requiring Suppliers' consent.

This section sets out the Workgroup's discussions following the receipt of industry participants' responses to the second Assessment Procedure consultation, leading to the development of the P315 Proposed and Alternative Modifications as described in Sections 3 and 4.

Responses to the second industry consultation

The P315 Assessment Consultation v2.0 sought market participants' views on the P315 Proposed and Alternative Modifications. Six out of the 13 respondents supported the Modifications, with a number of respondents still remaining concerned about some issues previously raised.

Anonymising data for Suppliers with a small market share

The Proposer and Workgroup considered the concerns of some respondents that P315 would disclose commercially sensitive data. The Workgroup believed that presenting data relating to Suppliers with a small market share in an aggregated and anonymous form in the Supplier Market Share Summary Data report would further mitigate the commercial sensitivity concerns. The Proposer and the Workgroup believed that this would protect smaller Suppliers by not exposing their market shares to their competitors, while still improving market transparency by publishing market share data for those large Suppliers.

How do the reporting thresholds work?

In order to identify and anonymise data for small Parties, two reporting thresholds would be introduced that capture Suppliers' market shares in both domestic and non-domestic retail markets. The principle is that if a small Supplier that has low market shares in both domestic and non-domestic retail markets (therefore captured by both thresholds), its data should be anonymised and further grouped in the report.

To be consistent with the approach that Ofgem currently uses to report domestic and non-domestic market shares, a Supplier's domestic market share would be represented by the number of PC1-2 MPANs it is associated with and its non-domestic market share would be represented by the energy volume its PC3-8 and HH customers consume over a reporting period.

What are the appropriate reporting thresholds?

The Proposer believed that the rationale for the thresholds should be to facilitate as much transparency as possible while protecting Suppliers with a very small market share, i.e. the thresholds should be set to the minimum levels that would achieve this. The Workgroup supported this.

The Ofgem representative noted that market shares are most often reported to show the degree of competitive pressure that Suppliers are likely to exert on their rivals. In this sense, Ofgem suggested that the transparency benefits associated with publishing individual market shares for very small Suppliers could be reduced and should be considered very carefully against the commercial sensitivity issues they may raise.

The Workgroup considered an analysis, based on Quarter 4 2014 data, on the number of Suppliers that would be anonymised under four threshold levels. The analysis⁶ can be found in Attachment D. The summary of findings is shown in the below table.

Threshold scenarios							
% of market share	Domestic MPAN threshold	Non-domestic volume threshold	Number of Supplier anonymised	Anonymised Volume (GWh)	Anonymised MPAN count	Anonymised % of Volume	Anonymised % of MPAN
0.18%	50,000	100GWh	24/49	696	201454	1.22%	0.73%
0.25%	69,000	142GWh	25/49	807	201876	1.42%	0.73%
0.5%	138,000	284GWh	29/49	1162	540865	2.04%	1.95%
1%	277,000	569GWh	34/49	2330	979215	4.09%	3.54%

The Ofgem representative noted that Ofgem has recently announced a review of the information it collects and publishes, which will include, among others, seeking representations from interested parties around frequency and level of aggregation of

⁶ We obtained quarterly aggregated PC3-8 and SVA HH energy volumes (for non-domestic measurement) and averaged PC1-2 MPAN number (for domestic measurement) for each Supplier. The MWh volume and MPAN number thresholds were derived from a certain percentage of the total market share in both markets across all Suppliers. See Attachment D for details.

market shares to be published. In its annual report to the European Commission, Ofgem currently publishes individual market shares for the largest six Suppliers and present in aggregate form the market shares for the remaining Suppliers (the individual market share reporting requirement for this report is based on a 5% threshold level).

The Workgroup noted a 1% reporting threshold is currently used in Cornwall Energy's industry market share reports. Following the discussions an attendee noted a voluntary 'opt in' approach for Suppliers is the case with current market share reports provided by third parties, and that this could be considered along with a threshold.

The Proposer believed that setting a high threshold would not provide sufficient transparency and would make it more difficult for new market entrants to understand the market. For instance, the analysis indicates that thresholds equating to 1% market share would result in 34 of the 49 Suppliers being anonymised, leaving only 15 being reported upon.

A Workgroup member echoed this view and said that ideally full transparency should be provided in order to understand the growth of Suppliers. An attendee questioned the value of reporting data for small Parties as he believed that reporting the market share of smaller Parties provides no benefit to those Parties or new entrants because the market is dominated by larger players.

Whilst the Proposer was not unhappy with a threshold equating roughly to 1% of market share, he was of the view that it could be lower; one of the purposes of this Modification is to allow potential new entrants to see how fast the type of companies they aspire to be can grow. This would not be achieved if only data relating to the Big Six were available. In the Proposer's view, the issue was not one of choosing a threshold to separate out large Suppliers from smaller Suppliers, but to choose a threshold below which a small Supplier could reasonably argue that their ability to grow could be inhibited by being perceived as too small. In the Proposer's view, this threshold would be 10,000 customers in the domestic market and 100GWh over a quarter in the non-domestic market. These thresholds do not equate to the same market share; 100GWh is approximately a 0.18% market share and 10,000 customers equates to a significantly lower market share.

However, although the Proposer preferred lower reporting thresholds, on balance and taking into account the concerns of industry participants, Ofgem's input, and existing industry reporting, he decided that, for the Proposed Modification, the reporting thresholds should be 250,000 MPANs for the domestic market and 500GWh volume for the non-domestic market, which are approximately equivalent to 1% market share in both markets (NB under the analysis these figures would result in 34 of the 49 Suppliers being anonymised, the same as the more precise figures equivalent to 1% market share presented in the summary table).

The Workgroup agreed with this view and unanimously decided that the reporting thresholds should be the same for the Alternative Modification, i.e. 250,000 MPANs for the domestic market and 500GWh volume for the non-domestic market.

Assessment Consultation Question

Do you support the reporting threshold approach?

Please provide your rationale.

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

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Assessment Consultation Question

Do you believe that the reporting thresholds which equate to approximately 1% market share are acceptable?

Please provide your rationale.

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

Assessment Consultation Question

What are your preferred thresholds for:

- Domestic (expressed as % market share or number of MPANs)?
- Non-domestic (expressed as % market share or GWh volume)?

Please specify your preferred thresholds and provide your rationale (if different to the proposed 1% equivalent thresholds).

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

Assessment Consultation Question

What do you believe are the lowest acceptable thresholds for:

- Domestic (expressed as % market share or number of MPANs)?
- Non-domestic (expressed as % market share or GWh volume)?

Please specify your preferred thresholds and provide your rationale (if different to the proposed 1% equivalent thresholds).

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

Publication of historical P0276 data (only applies to the Alternative Modification)

Rationale for publishing historical data

The Workgroup believed that, for the Alternative Modification, historical P0276 data as well as the new daily P0276 data should be published, or otherwise made available, to BSC Parties and data licensees. The Workgroup believed that having access to historical P0276 data would help parties to develop a better understanding of GSP Group demand and the development of embedded generation over time and subsequently improve forecasting in the future. Data from the Implementation Date onward would also be archived and made available to Parties and licensees that wish to begin to use the P315 arrangements after the Implementation Date (this aspect is the same as under the Proposed Modification).

Assessment Consultation Question

Do you believe historical P0276 data should be made available to BSC Parties and data licensees?

Please provide your rationale and any views on the data that should be available, e.g. period, run types, method of provision.

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

Delivery of P0276 data

The BSC Central Systems only archive and hold P0276 data going back 24 months. The Workgroup believed that all of this 24 months' data should be made available as archived P0276 data upon implementation.

It is estimated that quarterly P0276 data, for all Run Types, would be around 10GB, which creates problems for the ELEXON Portal storage. The Workgroup considered whether it would be worthwhile restricting archived P0276 data to specified Run Types in order to potentially facilitate increased storage on the Portal, and considered the vital Runs would be R1, Reconciliation Final Volume Allocation (RF) and Dispute Final (DF). However, the Workgroup considered that if possible it would be more useful to make data for all Run Types available.

The Workgroup believed that it could be possible to deliver the full set of data (including the 24 months prior to implementation, and covering all run types) using an approach under which:

- The ELEXON Portal provides P0276 data for the latest three months (on a rolling basis), which would be downloadable by BSC Parties and licensees;
- Any earlier P0276 data (back to 24 months before the P315 Implementation Date and onward from the Implementation Date) is archived by ELEXON and provided to BSC Parties and licensees upon request, in a form decided by ELEXON (e.g. on DVD or via Cloud data storage).

The approach has not yet been fully explored. The Workgroup will make a decision on the approach for data archive and hence the possible period of archive following consultation. The Workgroup welcomes any views on the usefulness of archiving data, and what data would be most important.

The Transmission Company's view

The Transmission Company responded to the P315 Assessment Consultation v2.0 and believed that both Proposed and Alternative Modifications would be better than the current baseline. In particular it confirmed the Workgroup's view that the publication of P0276 data would help the Transmission Company to improve its current understanding of embedded generation within distribution networks, which would be beneficial for its demand forecasting and charge setting activities.

CMA guidance on competition

ELEXON's legal representative reiterated the advice that the two cited documents were not relevant to the principle in P315, as one of the papers focused on investigations into market misconduct, while the other focused on horizontal co-operation agreements. The Workgroup agreed with view and welcomed the views from market participants if they can justify otherwise.

Workgroup's initial conclusion

The Workgroup has unanimously concluded that:

- The Proposed Modification **does better** facilitate the Applicable BSC Objectives when compared to the current baseline;
- The Alternative Modification **does better** facilitate the Applicable BSC Objectives when compared to the current baseline; and
- The Alternative Modification **does better** facilitate the Applicable BSC Objectives when compared to the Proposed Modification.

Therefore, the Workgroup initially recommends that the **P315 Alternative Modification should be approved and the P315 Proposed Modification should be rejected**.

Workgroup's views against the Applicable BSC Objectives

The Workgroup unanimously agreed that P315 would be neutral to Applicable BSC Objectives (a), (e) and (f) and would be beneficial to Applicable BSC Objective (b) and (c).

Two Workgroup members believed that both the Proposed and Alternative Modifications are marginally detrimental to (d) due to the associated implementation costs. They still believed that there would be benefits against the Objectives overall as they could see clear benefits against Applicable BSC Objective (b) and (c).

The following table contains the Workgroup's views against each of the Applicable BSC Objectives for both the Proposed Modification and Alternative Modification:

Does P315 better facilitate the Applicable BSC Objectives?		
Obj	Proposed Solution	Alternative Solution
(a)	• Neutral (unanimous)	• Neutral (unanimous)
(b)	• Yes (unanimous) The Transmission Company could benefit from having greater visibility of SVA embedded generations and therefore improve their demand forecast and charging activities. If BSC Parties can take advantage of the P315 data to improve their forecasting, there would be less imbalance volume for the Transmission Company to manage.	• Yes (unanimous) The benefits identified for the Proposed Modification would be greater if more market data is released, as under the Alternative Modification.
(c)	• Yes (unanimous) It would help the existing BSC Parties and new entrants to better understand Supplier market shares and would promote competition.	• Yes (unanimous) The benefits identified for the Proposed Modification would be greater if more market data is released, as under the Alternative Modification.

Does P315 better facilitate the Applicable BSC Objectives?

Obj	Proposed Solution	Alternative Solution
(d)	<ul style="list-style-type: none"> • Neutral (majority, including Proposer) • No but marginal (minority) There will be costs associated with the implementation of the P315 Proposed Modification. 	<ul style="list-style-type: none"> • Neutral (majority, including Proposer) • No but marginal (minority) The costs will be greater to implement the Alternative Modification than the Proposed Modification.
(e)	• Neutral (unanimous)	• Neutral (unanimous)
(f)	• Neutral (unanimous)	• Neutral (unanimous)



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]

(f) Implementing and administering the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation

Assessment Consultation Question

Do you agree with the Workgroup's initial unanimous view that P315 Proposed Modification **does** better facilitate the Applicable BSC Objectives than the current baseline?

Please explain your views, with reference to the Applicable BSC Objectives.

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

Assessment Consultation Question

Do you agree with the Workgroup's initial unanimous view that P315 Alternative Modification **does** better facilitate the Applicable BSC Objectives than the current baseline?

Please explain your views, with reference to the Applicable BSC Objectives.

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

Assessment Consultation Question

Do you agree with the Workgroup's initial unanimous view that P315 Alternative Modification **does** better facilitate the Applicable BSC Objectives compared with the P315 Proposed solution?

Please explain your views, with reference to the Applicable BSC Objectives.

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

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Appendix 1: Excerpts from Assessment Consultation v2.0

The following sections are Sections 7 and 8 of the second P315 Assessment Procedure consultation (with minor corrections and clarifications related to references to the 9 March 2015 meeting as the final meeting).

Workgroup's Discussions

Impact of commercial sensitivity on P315 data

As part of the Assessment Consultation, the Workgroup sought industry participants' views on any potential commercially sensitive data that the potential solutions could reveal. The responses suggested three key areas of concern, those are:

- GSP Group level of granularity;
- PC level of granularity; and
- Frequency of publication.

The Ofgem member of the Workgroup advised that currently Ofgem publishes Supplier market share data once a year and they would consider that publication frequencies proposed in the potential solutions (i.e. both monthly and daily under different potential solutions) are unlikely to be justified.

Taking into account consultation responses and Ofgem's comments, the Workgroup agreed to make significant changes to its potential solution 1 (website based solution) to:

- Report the ACCCs on a national level (rather than GSP Group level as previously proposed).
- Report PCs 1-2, 3-4 and 5-8 grouped together, i.e. segment by:
 - domestic (PCs 1-2 total);
 - small non-domestic (PCs 3-4 total); and
 - large non-domestic (PCs 5-8 total).
- Publish this Supplier market share summary on a quarterly basis (rather than monthly as previously proposed).
- Ensure that there was a two month lag between the end of the quarter and publication.

The Workgroup believed that this addressed the concerns around the P315 data revealing commercially sensitive information. The Workgroup considered that, compared with the solutions consulted upon, this revised solution would result in a smaller increase in transparency in the retail market and therefore less benefit being realised by the Modification. However the Workgroup agreed that the revised solution would be a good compromise in addressing some Parties' concerns over commercial sensitivity of the P315 data while enabling some benefit to be delivered.

An attendee⁷ acknowledged that the Workgroup had sought to address concerns around commercial sensitivity, but remained concerned that smaller Parties would be less able to use the data provided than those larger participants, due to resource constraints. As a

result, larger participants would be able to obtain better understanding of competitors from the data than those smaller participants.

The Workgroup's following consideration of the benefits and drawbacks of P315 is based on the data that would be published under this revised solution, i.e. the Proposed Modification and Alternative Modification as set out in this report.

Is there a case for change?

Embedded generation transparency

The Supplier Volume Allocation (SVA) arrangements encourage participants to combine their demand and embedded generation into one entity (i.e. within a Supplier BM Unit) to realise embedded benefits. The Workgroup considered that this masks the true customer demand and believed that this lack of transparency in SVA embedded generation could result in inefficient pricing in forward markets. A Workgroup member believed that the current wholesale price is overstated due to this pricing inefficiency.

The System Operator has low visibility of demand and generation behaviours within distribution networks meaning that they will find it difficult to forecast demand and dispatch generation efficiently.

The Workgroup believed that BSC Parties and the System Operator could take advantage of the Supplier market share data to improve their demand forecasting. Currently participants in the SVA arrangements can access the D0276 data flow but non-physical traders or participants with a wholly CVA business cannot. Therefore they are disadvantaged in that they could not see the GSP Group level total embedded generation and demand volumes. The Modification would lead to improved pricing and commercial decision making, resulting in a clear commercial benefit to all BSC Parties. A Workgroup member believed that these benefits would also ultimately extend to consumers.

Generation and supply market asymmetry

The Workgroup believed that the limitations in SVA data as described above means that there is an asymmetry of data transparency between the generation and supply markets. The Applicable BSC Objectives apply to both generation and supply, and while the HH data in the CVA market is transparent to all market participants the Workgroup believed that SVA data is far less transparent when compared to CVA data.

Monitoring NHH to HH transition

One of the ACCCs that would be introduced under P315 comprises PCs 5 to 8 Metering Systems, which are currently required to migrate to HH Settlement by 1 April 2016. The Workgroup believed that P315 would therefore help Suppliers to monitor the transition from NHH to HH for these MPANs following the P272 and P300 implementations.

Implementation impacts and cost

The Workgroup acknowledged that the benefits that it believes P315 would deliver are difficult to quantify, but believed that these benefits would outweigh the impacts and costs

of P315 implementation. The Workgroup considers that the implementation costs are not excessive compared with the potential benefits.

There will be no direct costs or mandatory system changes required for participants to implement either the Proposed Modification solution or the Alternative Modification solution. Participants may incur additional costs if they choose to make use of the data made available by P315, but this is not a mandatory cost associated with implementation.

Existing reporting

The Workgroup noted that currently some Suppliers voluntarily provide data to third parties, who in turn produce quarterly market share reports and provide them to subscribers and a number of respondents to the Assessment Consultation questioned why this data is insufficient.

The Workgroup believed that this is not a Settlement solution because third parties' market share report would be based on inference from a proportion of Settlement data. This would also leave those Parties who do not subscribe the reports at competitive disadvantage.

Competition issues

The Workgroup believed that publishing P315 data would help the existing market participants and potential new entrants to understand market shares by different customer types in the retail market and allow them to better identify opportunities and react to competition.

The Workgroup therefore felt P315 would promote competition and encourage new entrants to the electricity retail market due to better visibility. Furthermore, increased competition would encourage efficient pricing in both wholesale and retail markets, which would be beneficial for customers.

Two respondents cited a document from the Competition and Markets Authority (CMA) stating its policy and approach on transparency and a journal from the European Commission on competition. ELEXON's legal advice was that the two cited documents were not relevant to the principle in P315, as one of the papers focused on investigations into market misconduct, while the other focused on horizontal co-operation agreements. The Workgroup noted this and agreed the documents are not relevant to P315. An attendee⁷ disagreed with the Workgroup's view that the CMA report is not relevant to P315, noting that the legal advice specifically addressed the context in which the CMA set its guidance (i.e. a market investigation) rather than the general principles of whether market data should be made available at all.

Some respondents to the consultation had concerns that publishing excessive Supplier market share data would enable anti-competitive behaviours, i.e. larger Suppliers could identify the customer base for smaller Suppliers and take actions to 'squeeze them out of the market'. In response to these concerns, the Workgroup believed that neither the Proposed Modification nor the Alternative Modification would reveal customer base for Suppliers. It is the view of the Workgroup that any anti-competitive behaviour should be prevented by the regulatory framework.

Some respondents suggested that having to process the market share data would leave smaller Parties who are less resourced at a competitive disadvantage. The Workgroup

noted from the consultation responses that the majority of participants preferred less sophisticated solutions and believed that the website based solution is supposed to be user friendly and therefore should be usable to all parties.

An attendee⁷ noted the concerns of smaller market participants about the data that would be available under the solution options consulted upon. The Workgroup believed that it had addressed the concerns by developing the P315 solutions, that any possible abuse of data in the market would be limited by the regulatory framework and that no party should have an advantage or disadvantage because the data is available to everyone; however, the attendee remained concerned that smaller participants would be less able to make use of the data compared to larger participants, i.e. larger participants could benefit disproportionately because the data granularity would enable them to be much more aware of competitors.

Implementation dates and approach

Neither the Proposed Modification nor Alternative Modification would require any mandatory system changes by BSC Parties. The earliest BSC System Release in which the ELEXON Portal aspects of the Proposed Modification and Alternative Modification solutions can be implemented is June 2016.

The Workgroup initially believed that if P315 is approved the website summary aspect should be implemented in the November 2015 Release, with the Portal element(s) subsequently going live in the June 2016 Release. The rationales for the phased implementation are:

- The format of the website summary is designed to be user friendly, Parties and other users should not need further resources or time to be able understand and use the market share data.
- The Workgroup believes the summary would deliver benefit and therefore believes it should be implemented as soon as reasonably possible, and does not believe that a staged implementation approach would have any detrimental impact.
- Implementing the summary data in November 2015 would help Parties to monitor the transition of PCs 5-8 Metering Systems from NHH to HH as a result of approved Modification P300 (with the same Implementation Date of 5 November 2015).

However since a second Assessment Consultation will be issued, as Panel requested, the phased implementation approach would not be achievable. This means that the full solution package under the Proposed Modification or the Alternative Modification should be implemented on 30 June 2016, if approved. It is worth noting that, when compared with the initially proposed phased implementation approach, the benefit of monitoring the NHH to HH transition will be reduced if either the Proposed Modification or Alternative Modification is implemented on 30 June 2016 (i.e. no summary data will be provided for the period of November 2015 to June 2016).

Consultation comments on P315 Assessment

One consultation respondent, noting that it was one of the third party providers of information to industry stakeholders and had not participated in the Workgroup directly⁷ due to this commercial interest, raised a concern that some questions from industry responses to the P315 Impact Assessment were not addressed by the Workgroup in the Assessment Consultation and questioned whether the Workgroup had taken a balanced view in assessing P315. The respondent also questioned whether Workgroup members who are independent consultants and provide data services could act independently in the assessment of P315, given that the respondent considered they had a clear commercial interest.

P315 Impact Assessment and Assessment Procedure Consultation

The Workgroup noted that the aim of the industry Impact Assessment is to gather information from market participants on the likely mandatory impacts and costs on them to implement the Modification solutions. The P315 Impact Assessment sought industry impact and cost information on the possible solutions under consideration at that time to assist the Proposer and Workgroup in developing the Proposed and Alternative Modifications. The Workgroup also used the Impact Assessment as an opportunity to get an early view from industry participants on the potential benefits of P315 and concerns around areas like commercial sensitivity of data.

When the Workgroup considered the P315 Impact Assessment results it discussed the concerns that were raised by some market participants. The Workgroup noted the concerns but did not believe that there was enough information in the responses for it to determine what aspects of the initial options that it issued for Impact Assessment may be commercially sensitive, and therefore it was unable to determine how the concerns might be addressed.

Therefore, when the Workgroup issued the Assessment Procedure Consultation for P315 it particularly invited market participants to provide more information around their concerns. The consultation document listed all the data items that would be included in the potential Modification solutions and invited parties to indicate which of these they believed to be commercially sensitive and therefore should not be published. The Workgroup wished to fully understand participants concerns and to facilitate consideration of how it might be able to develop the P315 solution(s) to address these concerns, i.e. amend the solutions to avoid publishing commercially sensitive data while still delivering benefit.

The Workgroup welcomed the participation in its later meetings, as a non-voting attendee, of a representative of the company that raised the concerns around the issues. Note that this representative was the same referenced above who had originally signed up as a Workgroup member but decided not to participate in the previous Workgroup meetings due to its cited commercial interests in P315. The representative noted the explanation of the progression of P315 and confirmed that they believed that the Workgroup had considered and sought to address the concerns around commercial sensitivity of data set out in the responses to the P315 Assessment Procedure Consultation, though the representative still had concerns and also disagreed with the Workgroup's view with respect to the CMA, as set out above, in the relevant parts of this section.

⁷ The participant initially signed up to be a Workgroup member but decided it would not be appropriate to participate in this way, and only attended meetings from the Workgroup meeting on 9 March 2015, and then participated as an industry attendee, not a full voting member.

Workgroup membership and impartiality

The Workgroup discussed the concerns raised around the impartiality of Workgroup members. All Workgroup members are required to sign a declaration letter, which requires them to act independently in accordance with BSC Section F 2.4.9.

A Workgroup member, who did not have a data provider consultancy background, strongly believed that there was no reason to doubt the impartiality of any the P315 Workgroup members and believed that the concerns in this area raised in the consultation response were unfounded and inappropriate. The rest of the Workgroup agreed with this assessment.

The Workgroup also noted that if there had been any doubt about any member's impartiality or actions ELEXON should remind such member of their obligations and act to remedy the situation. ELEXON has seen no evidence that any Workgroup member has not acted in accordance with their obligations under the BSC in the progression of P315. It should also be noted that Ofgem has participated in the Workgroup throughout the progression of P315.

Further Assessment

The P315 Workgroup considered that it had completed its assessment of P315 and submitted the P315 Assessment Report in April 2015. However, the BSC Panel decided that P315 required further assessment, including industry consultation, as detailed below.

As well as the reasons for further assessment, this section sets out the views of the Workgroup relevant to the Panel's discussions and summarises some changes in this consultation from the Assessment Report submitted to the Panel.

Panel consideration of initial Assessment Report

The BSC Panel considered the P315 Assessment Report at its meeting on 9 April 2015. The Panel noted that the previous Assessment Consultation was issued to invite industry participants to comment on potential Modification solutions and raise and clarify any concerns they might have, particularly around commercial sensitivity of data which had been identified as an issue and which the Workgroup wished to better understand. The Proposer and the Workgroup had not established their Proposed and Alternative Modifications at that time, but issued several possible solutions for comment. The majority of consultation respondents did not believe the potential Modification solutions would better facilitate Applicable BSC Objectives and raised a number of concerns over the solution designs.

The Panel noted that the Workgroup, at its last meeting, considered the industry responses to the previous Assessment Consultation and developed the Proposed and Alternative Modifications. The Workgroup believed that the Proposed and Alternative Modification solutions addressed respondents' concerns and unanimously recommended that the Alternative Modification should be approved.

Although the solutions had not been finalised at the time of the previous consultation, the Workgroup did not believe that it was necessary to consult the industry again as part of

the Assessment Procedure, since it felt able to give final views and that P315 would be issued for industry consultation as part of the Report Phase.

However, the Panel did not feel able to make an initial recommendation based on the Workgroup's assessment. The Panel was concerned that though the majority of respondents had not supported the solution options consulted upon, the Workgroup had not consulted the industry on the finalised solutions in reaching its unanimous view that both Proposed and Alternative Modifications would be better than the current baseline. The Panel noted that the Workgroup had sought to address respondents' concerns in developing the Proposed and Alternative Modification solutions and P315 would be issued for Report Phase industry consultation, but believed that the industry should be further consulted on the Proposed and Alternative Modifications in the Assessment Procedure in order that the Workgroup can consider the results before the Panel gives its initial view.

As well as the primary concern that the Workgroup should consider the results of further industry consultation, the Panel also directed that the Workgroup should further consider the arrangements for non-BSC Parties to access data under P315. The Panel asked that further consideration be given to the licence arrangements and particularly to the justification of the licence fee for non-BSC Parties, and whether the proposed fee, how it is levied and the link to access to other data are appropriate. The Panel questioned whether requiring non-Parties to pay such a fee is in the interests of transparency and in line with the contention that P315 would benefit competition and prospective new entrants to the market.

The Panel also sought clarification of the Workgroup's views on how the CMA policy document related to P315. A Panel Member questioned whether P315 could be conflating two separate contended issues, i.e. masking of embedded generation and a lack of transparency around Supplier market share, and this had led to difficulty in developing a solution to address both whereas separate solutions could be more effective.

Impact of further assessment on Implementation Date

The Workgroup initially agreed to recommend a phased implementation approach for P315, with the website summary data arrangements implemented on 5 November 2015 and other parts of the solution implemented on 30 June 2016, subject to a decision approving the Modification being received by the cut-off date.

However, the further Assessment of P315 means that phased implementation beginning in November 2015 is not achievable. Therefore the Proposed Modification or Alternative Modification would be implemented on 30 June 2016 with no phased approach, if approved by the necessary date. The implementation section reflects this updated approach.

Further Assessment Procedure Consultation

The views of the Workgroup have not changed from those set out in the initial Assessment Report. As well as changes to reflect the impact on the P315 implementation approach the Workgroup's view that the CMA policy document is not relevant to P315 has been clarified on page 16; otherwise the content of this consultation document reflects the initial Assessment Report submitted to the Panel.

The P315 licencing approach was intended to indemnify BSCCo against the use of P315 data by non-BSC Parties. The Workgroup believed that linking the licence fee to that

already levied for access to other data would be efficient, and that a fee is appropriate to defray the cost to Parties of P315 implementation. The Workgroup invites views on the licencing approach for P315, what magnitude of data licence fee (if any) is appropriate and whether such fee should be linked to licencing of other data or separate.

As well as specifically asking whether the Proposed and Alternative Modification address participants' concerns and seeking views on the data licensing approach and fee, the consultation asks the usual questions (e.g. whether P315 better facilitates the Applicable BSC Objectives) in order to fully inform the Workgroup's further assessment of P315.

Appendix 2: Workgroup Details

Workgroup's Terms of Reference

Specific areas set by the BSC Panel in the P315 Terms of Reference

The Workgroup will carry out an Assessment Procedure for Modification Proposal P315 in accordance with Section F2.6 of the Balancing and Settlement Code.

The Workgroup will produce an Assessment Report for the BSC Panel Meeting on 11 June 2015.

The Workgroup will consider and/or include in the Assessment Report as appropriate:

- a) What is demand for this data across the industry?
- b) How should the data be published?
 - i) Channel of publication
 - ii) Format of data
 - iii) Frequency of publication
- c) What are the impacts on Parties' systems to implement P315?
- d) What is the most appropriate Implementation Date for P315?
- e) What changes are needed to BSC documents, systems and processes to support P315 and what are the related costs and lead times?
- f) Are there any Alternative Modifications?
- g) Does P315 better facilitate the Applicable BSC Objectives than the current baseline?

Assessment Procedure timetable

Proposed Progression Timetable for P315

Event	Date
Present Initial Written Assessment to Panel	09 Oct 14
Workgroup Meeting 1	24 Oct 14
Central Systems and Industry Impact Assessment	12 Nov 14 – 03 Dec 14
Workgroup Meeting 2	09 Dec 14
Workgroup Meeting 3	19 Jan 15
Assessment Procedure Consultation	09 Feb 15 – 27 Feb 15
Workgroup Meeting 4	09 Mar 15
Present Assessment Report to Panel	09 Apr 15
Assessment Procedure Consultation v2.0	20 Apr 15 – 11 May 15
Workgroup Meeting 5	18 May 15
Workgroup Meeting 6	19 June 15
Assessment Procedure Consultation v3.0	1 Jul 15 – 21 Jul 15
Workgroup Meeting 6	W/B 20 Jul 15
Present Assessment Report to Panel	13 Aug 15

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Assessment Procedure
Consultation v3.0

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Workgroup membership and attendance

P315 Workgroup Attendance							
Name	Organisation	24 Oct 14	09 Dec 14	19 Jan 15	09 Mar 15	18 May 15	19 Jun 15
Members							
Dean Riddell	ELEXON (<i>Chair</i>)	✓	✓	✓	✓	✓	☎
Oliver Xing	ELEXON (<i>Lead Analyst</i>)	✓	✓	✓	✓	✓	☎
Colin Prestwich	SmartestEnergy (<i>Proposer</i>)	✓	✓	✓	✓	✓	☎
Phil Russell	Independent Consultant	✓	✓	✓	✓	✓	☎
Greg Mackenzie	British Gas	✓	☎	✓	✓	✓	☎
Walter Hood	IBM on behalf of ScottishPower	☎	✓	✓	✓	✓	☎
Tom Edwards	Cornwall Energy	✗	✗	✗	☎	☎	☎
Phil Hewitt	Enappsys	✓	☎	✓	✓	✓	☎
Esther Sutton	E.ON	✓	✓	☎	☎	✗	✗
Andy Colley	SSE	✗	✓	✓	✓	✓	✗
Attendees							
Matthew McKeon	ELEXON (<i>Design Authority</i>)	✓	✓	✓	✓	✓	☎
Geoff Norman	ELEXON (<i>Lead Lawyer</i>)	✗	✗	✓	✓	✓	✗
Monica Gandolfi	Ofgem	✓	✓	✓	✓	✓	☎

Appendix 3: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Glossary of Defined Terms	
Acronym	Definition
ACCC	Aggregate Consumption Component Class
BMU	Balancing Mechanism Unit
BSC	Balancing and Settlement Code
CCC	Consumption Component Class
CfD	Contract for Difference
CMA	Competition and Markets Authority
CSD	Code Subsidiary Document
CVA	Central Volume Allocation
DF	Dispute Final
DTC	Date Transfer Catalogue
DUoS	Distribution Use of System
EMR	Electricity Market Reform
GSP	Grid Supply Point
HH	Half Hourly
IDD	Interface Definition Document
LEG	Licence Exemptible Generator
LLFC	Line Loss Factor Class
MPAN	Metering Point Administration Number
MPID	Market Participant Identifier
NHH	Non Half Hourly
PC	Profile Class
R1	First Reconciliation Volume Allocation
RF	Final Reconciliation Volume Allocation
SSC	Standard Settlement Configuration
SVA	Supplier Volume Allocation
SVAA	Supplier Volume Allocation Agent
TPR	Time Pattern Regime
URS	User Requirements Specification

DTC data flows and data items

DTC data flows and data items referenced in this document are listed in the table below.

DTC Data Flows and Data Items	
Number	Name
D0018	Daily Profile Data Report
D0030	Non Half Hourly Distribution Use of System (DUoS) Report
D0081	Supplier Half Hourly Demand Report
D0082	Supplier Purchase Matrix Report
D0276	GSP Group Consumption Totals Report
D0362	Contract for Difference (CfD) Supplier Invoice Backing Data

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
3, 15	P315 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p315/
5	SAA-I0141 (Settlement Report sub flow 1) description	https://www.elexon.co.uk/wp-content/uploads/2014/07/neta_idd_part_1_v31.0.pdf
5	SAA-I0142 (Settlement Report sub flow 2) description	https://www.elexon.co.uk/wp-content/uploads/2014/11/neta_idd_part_2_v31.0.pdf
5	SAA-I0143 (Settlement Report sub flow 3) description	https://www.elexon.co.uk/wp-content/uploads/2014/11/neta_idd_part_2_v31.0.pdf
5	DTC website	http://dtc.mrasco.com/Default.aspx
5	Data flow descriptions on the DTC website	http://dtc.mrasco.com/ListDataFlows.aspx
8	P114 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p114-entitlement-of-licence-exemptable-generators-legs-and-other-non-trading-parties-to-bsc-membership-without-evidence-of-trading/

Appendix 4: Legal text description

This section describes the rationale of the proposed legal text changes to deliver P315 solutions in plain English. The entire section applies to both Proposed and Alternative Modification, except for the paragraph in red which only applies to the Alternative Modification.

P315 Reporting Obligation for BSCCo and SVAA

Legal text Section V 'Reporting' (Define high level reporting obligation for the BSCCo)

4.2.2 (g) is added to introduce the new 'Supplier Market Share Summary Data' into the market data category that ELEXON will need to report under the P315 solution.

4.2.10 is added to define the meaning and presentation of Supplier Market Share Summary Data, i.e. Suppliers' data will be grouped together if their market shares fall below the reporting thresholds.

4.2.11 is added to describe what the thresholds are.

4.2.12 is added to define that ELEXON will publish Supplier Market Share Summary Data after it receives the backing data from the SVAA (which methodology is defined in Annex S-2).

Legal text Section V Annex V-1 (Define high level reporting obligation for the SVAA)

Table 7 is amended to insert a new data category, 'Supplier Market Share Summary Data'. This specifies the SVAA shall provide the data to ELEXON on a quarterly basis (this is the data ELEXON will use to produce the Supplier Market Share Summary Report).

Table 7 is amended to expand recipients of GSP Group Consumption Information to also include 'Any person (on request)'. This will enable non-BSC Parties access the P0276 data, with the necessary licence (the licence would be developed as part of implementation and is separate to the legal text).

[This paragraph is only applicable to Alternative Modification] Table 7 is amended to include the new GSP Group Market Matrix report, which is an additional requirement for the Alternative solution. This report will be provided to BSC Parties and non-Parties via the ELEXON Portal, where non-Parties will be subject to the same licence as described above. The new report will be defined in the SVAA data catalogue, which will be developed as part of the solution implementation. The structure of this new report is provided in Annex 3.

P315 methodology of SVAA data production

Legal text Section S Annex S-2 (SVAA data production)

Paragraph 9A is added to define the methodology for the SVAA to derive the Supplier Market Share Data for individual Supplier, which it would submit to ELEXON for it to produce the Supplier Market Share Summary Data report for all Suppliers. Specific mathematical symbols used in the calculation equation are defined in Annex X-4/5/6/7. The rationale behind the new calculations in Paragraph 9A is based on the following: Existing SVAA processing for settlement purposes already requires summation of HH Supplier BM Unit volumes for both consumption and losses for each Supplier by

Consumption Component Class. These consumptions and losses are then combined and the relevant correction factors applied.

However, for the new Supplier Market Share Summary Data (to be published on the website), a lower level of summation is required for each Supplier by **Profile Class** within one specific category of Consumption Component Class, namely Non Half Hourly Active Import. The sections **from 9A.1 to 9A.3** inclusive are the formulae that represent these equivalent calculations at the Profile Class level.

With the above summation calculations defined, the subsequent paragraphs **9A.4 and 9A.5** are the further summations that form the basis of the Supplier Market Share Summary Data report. For this report, consumption for each Supplier needs to be summed over a calendar quarter for each of the Consumption Reporting Groups defined in Section X-6 and listed in full Table X-9. These groups are either combinations of Profile Classes or of Consumption Component Classes, hence the (a)/(b) logic.

Additionally, as the reported Metering System Counts are averages, the total in 9A.5 is divided by the number of calendar days in the relevant quarter, as this will vary.

P315 technical definitions

Legal text for Annex X-1

The new terminology of Supplier Market Share Summary Data and Consumption Reporting Group (technical characteristics further defined in Annex X-9) are introduced into the general and technical glossaries.

Legal text for Annex X-4/5/6/7

Mathematical and technical definitions used in Annex S-2 9A will be introduced into Annex X-4/5/6 respectively to support the new calculation, namely the use of a subscript 'G' to represent Consumption Reporting Group and a subscript 'q' to indicate a calendar quarter. These are defined in X-4 and the associated summation calculation over a quarter by Consumption Reporting Group in X-5.

Legal text for Annex X-9

The associated properties for Consumption Reporting Groups as described in Annex X-1 are defined in Table X-9. This is modelled on the preceding Table X-8 as the new groups share three properties with Consumption Component Classes, in that they can either be:

- Non Half Hourly or Half Hourly 'Data Aggregation Type is either 'N' or 'H');
- Import or Export (Measurement Quantity ID is either 'AI' or 'AE'); or
- Metered or Unmetered (Metered/Unmetered Indicator is either 'M' or 'U').

Annex 1: Definition of Consumption Reporting Groups

The Supplier Market Share Summary Data under both the Proposed and Alternative Modifications would contain the following Consumption Reporting Groups, for both aggregated Metered Volume and averaged MPAN number, be reported for each Supplier (unless they fall below both domestic and non-domestic reporting thresholds) for each calendar quarter using the R1 Run data.

P315 would introduce the term 'Consumption Reporting Group' to the BSC. Consumption Reporting Groups simply describe the breakdown of types of SVA energy volumes (both import and export) for Suppliers according to their characteristics in order to define how they would be reported under P315. There are domestic and non-domestic Consumption Reporting Groups. The attributes of each Consumption Reporting Group are summarised in the table below, in terms of:

- Measurement Quantity ID, i.e. Active Import (AI) or Active Export (AE);
- Data Aggregation Type, i.e. Half Hourly (H) or Non Half Hourly (N); and
- Whether Metered (M) or Unmetered (U).

Please note that Consumption Reporting Groups were renamed from the Aggregate Consumption Component Classes (ACCCs) as described in the previous P315 documents. This is for the avoidance of technical contradiction as Profile Classes are not an attribute of Consumption Component Classes.

The Consumption Reporting Groups will contain the following:

Consumption Reporting Group	Measurement Quantity ID	Data Aggregation Type	Metered/ Unmetered Indicator
Non Half Hourly Metered Import (Profile Classes 1 and 2)	AI	N	M
Non Half Hourly Metered Import (Profile Classes 3 and 4)	AI	N	M
Non Half Hourly Metered Import (Profile Classes 5, 6 , 7 and 8)	AI	N	M
Non Half Hourly Unmetered Import	AI	N	U
Non Half Hourly Export	AE	N	M
Half Hourly Metered Import	AI	H	M
Half Hourly Unmetered Import	AI	H	U

Half Hourly Export	AE	H	M
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In addition, ELEXON would obtain CVA import volume for Suppliers using the R1 Run SAA-I0143 data. This can be done by deriving the total import Metered Volumes applicable to BM Units which are liable for Supplier CfD payments (summed over each reporting quarter) for each Supplier for which the value is not equal to zero (and multiply it by -1 so that it is reported as a positive value). This CVA import data would be added to the Supplier Market Share Summary Data report for completeness.

Annex 3: Format of 'GSP Group Market Matrix Report'

Group	Group Description	Range	Condition	L1	L2	L3	L4	L5	L6	Item Name
HDR		1		G						
					1					Settlement Date
					1					Settlement Code
					1					Settlement Code Description
					1					SSR Run Date
					1					SSR Run Number
					1					SSR Run Type Id
GSP		0-*		G						
						1				GSP Group Id
						1				GSP Group Name
CON		0-*					G			
								1		Profile Class Id
								1		Standard Settlement Configuration Id
								1		Line Loss Factor Class Id
								1		Distributor Id
								1		Time Pattern Regime
								1		SPM Total EAC Report Value
								1		SPM Total EAC MSID Count
								1		SPM Total Annualised Advance Report Value
								1		SPM Total AA MSID Count
								1		SPM Total Unmetered Consumption Report Value
								1		SPM Total Unmetered MSID Count
								1		SPM Default EAC MSID Count
								1		SPM Default Unmetered MSID Count