

Assessment Procedure Consultation Responses

P329 'Changes to REMIT inside information reporting'

This Assessment Procedure Consultation was issued on 22 December 2015, with responses invited by 13 January 2016.



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
RWEST	2/0	Generator
National Grid Interconnectors limited	2/0	Interconnector Error Administrator, Interconnector Administrator
E.ON	7/2	Generator, Supplier, Interconnector User, Non Physical Trader, ECVNA, MVRNA
Drax Power Limited	1/0	Generator
Centrica	10/0	Generator, Supplier
EDF Energy	8/4	Generator, Supplier, ECVNA, MVRNA
National Grid	1/0	Transmission Company

P329
Assessment Consultation
Responses

15 January 2016

Version 2.0

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Question 1: Do you agree with the Workgroup's initial (unanimous) view that P329 does better facilitate the Applicable BSC Objectives than the current baseline?

Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

Responses

Respondent	Response	Rationale
RWEST	Yes	Especially with reference to BSC objective (e) and compliance with EU regulation
National Grid Interconnectors limited	Yes	We believe that P329 better facilitates BSC objective (e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]. The Modification delivers the ACER requirements with regards to REMIT common schemas and for inside information web feeds.
E.ON	Yes	For the reasons given by the workgroup in the consultation.
Drax Power Limited	Yes	<p>Drax agrees that P329 better facilitates the Applicable BSC Objectives (ABOs) (c), (d) and (e).</p> <p>The Agency for the Co-operation of Energy Regulators (ACER) has updated its requirements for the Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT) common schemas for inside information web feeds. Drax believes that by bringing the BMRS into alignment with these new requirements, P329 better facilitates ABO (e) over the baseline.</p> <p>In addition, the changes introduced under the current P329 solution will better facilitate ABO (c), as it will promote transparency in the market, therefore it better facilitates competition.</p> <p>Using a central platform for the publishing of inside information promotes efficiency by delivering information in a single place and in a standardised format. Greater efficiency is achieved for those users that require access to the data and those that must provide this information to ACER as set out under REMIT, thereby the modification better facilitates ABO (d).</p>

Respondent	Response	Rationale
		However, it is unfortunate that the solution cannot be implemented in the timescales prescribed by ACER. As such, the implementation timescales may be detrimental to efficiency, due to the duplication in effort across the industry to meet the July 2016 deadline.
Centrica	Yes	P329 is justified under Applicable BSC Objective (e) so as to meet Article 10(1) of the EU REMIT Implementing Regulation.
EDF Energy	Yes	Modification of BMRS will reduce the risk of BSCCo being considered in breach of EU REMIT Implementing Regulation (Regulation (EU) 1348/2014), and provide compliance with ACER REMIT Manual of Procedures on data reporting v3.0, and thus better meet BSC Objective (e) concerning EU regulations. Continued use of BMRS as a (voluntary) central platform for publishing GB REMIT data should better meet BSC Objectives (b) and (c) relating to efficient system operation and competition respectively, compared with cessation of reporting via BMRS due to non-compliance with EU requirements.
National Grid	Yes	-

Question 2: Do you agree that the Requirements in Attachment A delivers the intention of P329?

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

Responses

Respondent	Response	Rationale
RWEST	Yes	Agreed in that they cover the requirements by ACER to provide web feeds. They also cover the intention to align the presentation on the website with ACER XSDs.
National Grid Interconnectors limited	Yes	The Requirements document delivers the changes proposed by P329.
E.ON	Yes	We have not identified any other changes at this stage.
Drax Power Limited	No	Attachment A creates ambiguity over the requirements. At a high level the table covers ACER's requirements. However, there appears to be differences in the data fields, for example with Event Status and Fuel Type, meaning there is not enough information to perform a detailed impact assessment on the proposed changes. These fields have the same titles in page 5 of the attachment, but have different acceptable values. Drax would encourage the workgroup to provide further detail to the industry prior to making a final decision.
Centrica	Yes	-
EDF Energy	Yes	The requirements capture the main aspects of the change. Although out of scope of the document, should the "Outage profile for REMIT" solution option be adopted and National Grid's REMIT MODIS interface is retained as part of P329, a change mechanism to align MODIS with Elexon / ACER changes would be required, within appropriate delivery timescales, to ensure that both REMIT interfaces will be available to all MPs on an agreed implementation date.
National Grid	Yes	We agree that the Requirements document captures the changes required by ACER.

Question 3: Do you agree that the draft legal text in Attachment B delivers the intention of P329?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	1

Responses

Respondent	Response	Rationale
RWEST	Yes	Seems sensible to clarify the detail in section 'O' and any associated documents
National Grid Interconnectors limited	Yes	The draft legal text seems to deliver the requirements of P329. Our only concern is about the drafting approach and whether the obligations should have been removed from the BSC and placed in a Code Subsidiary Document. We note that this topic is not covered in the workgroup discussions and we would like assurance that any further changes (to the CSD) are subject to industry consultation, as indicated.
E.ON	Yes	We have not identified any further changes at this stage.
Drax Power Limited	Yes	Yes this seems sensible.
Centrica	Yes	-
EDF Energy	Other	The proposed changes would remove all indication within the BSC itself as to what Inside Information Data is, and the content of Inside Information Messages to be received and published. Although this may reduce the administrative effort to change details of the message content in future, it reduces understandability of the BSC. The definition of an Inside Information Message will need to be changed, and we suggest an explicit reference to EU requirements be created to facilitate cross-referencing by users of the BSC itself. (Note that terms "Communication Requirements" and "Communications Requirements" are used in different parts of the BSC to mean the same thing – this should be rectified through future housekeeping changes).
National Grid	Yes	We agree that the draft legal text delivers the intention of P329 and support the move

Respondent	Response	Rationale
		to keep detail such as data format out of the code itself

Question 4: Do you agree with the use of ATOM for the web feed to ACER? (i.e. instead of RSS)?

Summary

Yes	No	Neutral/No Comment	Other
2	1	3	1

Responses

Respondent	Response	Rationale
RWEST	No	Would prefer RSS as have had issues with ATOM and Microsoft Office
National Grid Interconnectors limited	No comment	-
E.ON	Yes	We can accept ATOM as this is a feed from Elexon to ACER. We understand that ATOM is more feature rich compared to RSS.
Drax Power Limited	Neutral	Provided the use of ATOM instead of RSS meets ACER's requirements, then Drax's position is neutral on this point.
Centrica	Yes	More specifically we do not disagree: the choice of web feed to ACER can be made by Elexon.
EDF Energy	Other	As Elexon will be implementing this, we don't think it matters too much to EDF Energy, unless we also choose to shadow this implementation on our public REMIT site. If so, we would investigate whether RSS or ATOM will be more costly to implement, and whether this has differential implications for the performance of our REMIT website. As a system (BMRS) to System (ARIS) integration, a syndication feed (either RSS or ATOM) seems like a curious approach, we would largely characterise both as generally intended for human end users via a feed reader. Both are also polling approaches which are inefficient compared to pushing the data as it changes and both are legacy technologies. RSS has greater adoption amongst the general population, whilst ATOM is more standardised. HTTP REST services (which are lighter weight not relying on XML) seem to be more en-vogue for service integration or traditional messaging approaches such as MQ or other middleware which are typically quicker (lower latency, although needing more infrastructure).

Respondent	Response	Rationale
National Grid	N/A	-

Question 5: Do you believe that the ACER required web feed should also be available to participants and other interested organisations? (i.e. as well as the API web feed)

Summary

Yes	No	Neutral/No Comment	Other
5	0	2	0

Responses

Respondent	Response	Rationale
RWEST	Yes	<p>Open availability is consistent with the BSC objective c on increased transparency and</p> <p>ACER clearly encourage provision to the widest public possible in section 7.4 of the MoP :</p> <p>The Agency considers web feeds an effective tool to spread inside information to the widest public possible. This is why the Agency encourages inside information platforms and company websites to allow all stakeholders to subscribe to their web feeds, in order to further increase transparency in EU wholesale energy markets.</p> <p>In addition, Market participants need to validate communications to ACER and would require RSS access to confirm.</p>
National Grid Interconnectors limited	No comment	-
E.ON	Yes	We can understand why this may be of benefit to some participants so would not oppose such a feed being made available, as long as the costs of doing so are small.
Drax Power Limited	Yes	Drax believes that this would better facilitate transparency and provide a central data feed for GB inside information reporting. Further, it may also reduce the level of data scraping experienced on the BMRS and individual participants' websites.
Centrica	Yes	We have no objections to the ACER required web feed being made available in this way.
EDF Energy	Yes	We see benefit in use of the API web feed, and expect many participants will prefer this in the long term, but wider availability of RSS/ATOM webfeeds (beyond ACER) would provide readily simple access to those requiring it. It would be preferable if BMRS could be used as a single, central web feed interface for published REMIT messages for the GB Market. We believe this platform has been suitably

Respondent	Response	Rationale
		scaled, with the appropriate resilience and security in place, to provide this service and should be the primary source of this information. However, mandatory publication to this central platform would be required to fully realise the investment in this service.
National Grid	N/A	-

Question 6: Do you support the inclusion of an option for participants to submit an outage profile for REMIT insider information purposes? Please indicate the impact that this may have on your organisation.

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

Responses

Respondent	Response	Rationale
RWEST	Yes	<p>Meets ACER and OFGEM requirements to provide information that facilitates a clear understanding of an outage event. ACER guidance, section 7.2.2. asks for "Any other information necessary for the reader to understand the relevant information"</p> <p>Consistent with best practice reporting on the Nord Pool UMM website.</p> <p>Also, will help to standardize reports and reduce volumetric challenges from current reports.</p> <p>Impact for our organisation : minimal. Already prepared to provide profiles.</p>
National Grid Interconnectors limited	Yes	<p>We support the inclusion of an option for participants to provide an outage profile. NGIL use the 'related information field' to provide updates and/or more granular information about the outage. Being able to provide supporting tables or graphs would be more efficient and allow details of the outage to be more clearly explained to users of the IFA interconnector.</p>
E.ON	Yes	<p>Outage profiles are currently missing from REMIT submissions but included in the European Transparency Regulation submissions, which go on to ENTSO-E, including outage profiles in the submissions will make both submissions more in line with each other.</p>
Drax Power Limited	Yes	<p>Drax agrees that there should be an option for participants to submit an outage profile for REMIT insider information purposes. It is possible to do this using the currently BMRS functionality by reporting individual elements of a profile as separate outages. We therefore believe this can be easily achieved without changes to the BMRS.</p>

Respondent	Response	Rationale
Centrica	No	<p>We do not see the need for this. Enabling an outage profile option would add a lot more IS complexity, but would not provide market participants with much additional insight. We feel it is sufficient to know that a unit is planning to return with uncertainty on output. Market participants can look at the MEL within day for information on how that unit is performing.</p> <p>If Elexon includes outage profile data, then this will mean that the data format being submitted to Elexon differs to the data format specified by ACER. This would be an additional overhead on our systems where we would potentially have to support more than one REMIT standard even after 2017.</p> <p>Although we are not in favour of the proposal, if an option to submit an outage profile was to be included, it is important that it remains optional. If it was included in P329 it should be implemented at the same time as the rest of P329.</p>
EDF Energy	Yes	<p>We support RWE's proposal under Issue 63 to be able to publish detailed outage profiles in a single message. Although optional, this option would greatly reduce the number of REMIT messages required when there are multiple MW changes in an outage profile. We would need to complete some analysis, design and development and testing internally. There is an assumption here that National Grid would also need to change their MODIS system to accept the new optional information in the new REMIT schema. Depending on the above assumption, integration testing would need to follow our internal testing with National Grid and / or Elexon.</p>
National Grid	Yes	<p>We would expect Option 1 to have a beneficial effect on MODIS (subject to Option 2), BMRS and EMFIP systems in terms of reducing the number of files that need to be processed from each participant and hence the loading on each system and the throughput processing times.</p> <p>In addition, including the Option 1 (Reporting on outage profile) within the scope of P329 REMIT changes, will allow implementing REMIT changes within the same implementation cycle and with reduced need for system outages.</p>

Question 7: Do you support the removal of MODIS submission to BMRS for REMIT purposes? Please indicate the impact that this may have on your organisation.

Summary

Yes	No	Neutral/No Comment	Other
2	4		1

Responses

Respondent	Response	Rationale
RWEST	Yes	<p>Would address current inconsistency with Asset Id validation.</p> <p>No impact as we currently use the Elexon Rest API for REMIT submissions.</p>
National Grid Interconnectors limited	Other	We submit our REMIT information via the Elexon portal. There has been limited information provided on this aspect of the Modification and we expect users of MODIS to highlight any impacts of the change on them.
E.ON	No	<p>We submit all data via MODIS. Removing the submission to BMRS via MODIS would mean that we would have to use one of the submissions methods supported by ELEXON (API or User Interface). We would have to develop and support this and continue to submit via MODIS for the other European Transparency Regulation data, therefore supporting two submission mechanisms and handling the response back from two sources. This would be just over two years after MODIS was introduced and would result in a waste of expenditure on those aspects of that system related to REMIT submissions. We would query whether consequential changes to the Grid Code would also be required to remove the REMIT information provision from Users and reporting features of MODIS on National Grid from the Grid Code.</p>
Drax Power Limited	No	<p>Drax, along with other market participants, have invested resource into reporting data to the BMRS via MODIS. At the time of taking our decision to invest, it was believed that MODIS would be a long-term solution. It is highly disappointing that consideration is now being given to removing this route to data delivery.</p> <p>The removal of MODIS would not promote efficiency. MODIS is used for both REMIT and</p>

Respondent	Response	Rationale
		<p>European Transparency Regulation (ETR) reporting, providing a single delivery point for data relating to unit availability. Removing MODIS would require market participants to invest in two interfaces for reporting transparency data.</p> <p>Furthermore, MODIS provides functionality that is not available via the Elexon Portal. MODIS provides communication in both directions, including confirmations of receipt which helps with data error handling. This was a key driver in Drax opting to use the MODIS solution.</p> <p>Whilst Drax supports updating IT systems over time to adapt to changes in the market, we do not support the development and scrapping of data interfaces over such short periods of time. This only serves to reduce confidence in the BMRS being the preferred choice for the national REMIT Inside Information platform.</p>
Centrica	No	<p>No, given that market participants existing systems will be using MODIS for submission to BMRS, this should be retained to minimise the changes market participant's need to make in implementing P329.</p> <p>If the MODIS interface between National Grid and BMRA is removed we would have to build a new REMIT interface directly to the BMRS by February 2017. As stated above, our preference is to retain the MODIS interface. If a decision is made to remove the MODIS interface, then parties should be allowed a further transitional period (beyond February 2017) to set up the new interface to BMRS.</p> <p>We would also like confirmation that the European Transparency Regulation (ETR) interface between MODIS and BMRA is not impacted. So that, even if the decision was taken to remove the interface for REMIT, then the existing interface for ETR remains.</p>
EDF Energy	No	<p>Although EDF Energy recognises the reasons why this option has been proposed, we have invested (together with many other Market Participants and possibly software providers) in the MODIS interface for REMIT message publication. A move away from this interface would waste previous investment and would incur additional design, development and testing costs. These costs would be in the order of £34K. We are accessing MODIS over a dedicated circuit which is likely to have a better level of resilience\robustness\performance, compared with a</p>

Respondent	Response	Rationale
		<p>standard shared internet connection to Elexon. We would suggest that any move to the latter would jeopardise a MPs ability to fulfil their REMIT obligations, should an internet issue impact both their REMIT website and publications via Elexon.</p> <p>We would require access to Elexon’s REMIT Market Participant test environment, to complete regression and integration testing activities, which would need to be available to facilitate any possible cutover to Elexon’s REMIT interface in the future. Historically, access to this environment has not been available permanently to Market Participants, which has impacted our delivery timescales, so we would suggest that this would need to be addressed prior to any possible move to a single interface for REMIT message publication.</p>
National Grid	Yes	<p>Option 2 proposes that all future REMIT submissions are sent directly to ELEXON’s Portal and bypass MODIS. We believe there may be advantages to industry as a result of this approach as it should provide a simpler reporting structure (i.e. including clear separation between ETR and REMIT submissions), and a single reporting mechanism and a single data entry portal and graphical interface for REMIT. More importantly, and as set out in the P329 TCA, the amount of activity taking place on MODIS (i.e. the same system that is used to meet NGET’s P305 obligations) in similar timescales is increasing and so there are clear benefits in relation to MODIS resilience if the amount of change taking place on the same system is minimised. Similarly, if Option 2 is not taken forward then there is a risk to the delivery of both P329 and the MODIS changes being developed in response to the P305 delivery issues experienced in November 2015. There is also a clear performance impact as the amount of data being managed by MODIS would be reduced by Option 2.</p> <p>Therefore we strongly support Option 2 and are very keen to explore the extent to which this would lead to significantly increased impacts and costs for individual market participants currently utilising MODIS for their REMIT Inside Information submissions to BMRS as a result.</p>

Question 8: Do you believe there are any additional considerations for the Workgroup?

Summary

Yes	No	Neutral/No Comment	Other
2	4	1	0

Responses

Respondent	Response	Rationale
RWEST	No	-
National Grid Interconnectors limited	No	-
E.ON	No	-
Drax Power Limited	Yes	If consideration is to be given to removing MODIS as a method of posting REMIT data to the BMRS, then consideration should be given to the investment made by market participants to date in developing systems that interface with system. In addition, we are not sure why the removal of MODIS is within scope of P329, which is essentially seeking to implement a data feed to ACER.
Centrica	Yes	Ensuring that there is sufficient time for end-to-end testing by market participants well before P329 goes live.
EDF Energy	No	No additional comments at this time.
National Grid	N/A	-

Question 9: Do you have a potential Alternative Modification, within the scope of P329 that would better facilitate the Applicable BSC Objectives compared to the Proposed Modification?

Summary

Yes	No	Neutral/No Comment	Other
1	4	1	1

Responses

Respondent	Response	Rationale
RWEST	Yes	In an attempt to meet the ACER timeline I would like to suggest that the modification is spread over a number of releases. The first release would focus on just the web feeds and not attempt to change the website presentation.
National Grid Interconnectors limited	No	-
E.ON	No	-
Drax Power Limited	Other	It is unfortunate that a solution is being implemented eight months after the obligation comes into force. It would be preferable to find a solution that would meet the ACER recommendations in a timely manner in order to protect industry participants.
Centrica	No	P329 can be amended to reflect participants' feedback.
EDF Energy	No	None at this time.
National Grid	N/A	

Question 10: Will P329 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

Responses

Respondent	Response	Rationale
RWEST	Yes	No significant differences
National Grid Interconnectors limited	Yes	We note that limited information is provided in the workgroup report on the impacts/costs of implementing P329. We will need to make some changes to be able to report in line with the ACER REMIT common schema and to provide outage profile reporting but this should be minimal. As mentioned earlier we do not submit REMIT submissions via MODIS.
E.ON	Yes	We would need to amend our systems to reflect new format and information requirements to feed through to MODIS. In addition please refer to our response to question 7 in relation to removal of REMIT submissions via MODIS.
Drax Power Limited	Yes	<p>Under the original P321 [<i>sic</i>] proposal, Drax will have to alter its data submissions to MODIS in order to meet the new requirements of the system. We consider these costs necessary to comply with ACER's requirements. There will also be a cost of developing a direct web feed to cover the eight month gap between the new obligations coming into force and the implementation of P329. It is unfortunate that industry must duplicate the effort to provide web feeds due to the inability of the central system to keep pace with changing ACER requirements.</p> <p>We have already outlined above that there will be an unnecessary duplication in the expenditure associated with the removal of MODIS (if this were to go ahead) as a method of data submission to the BRMS for Drax and other companies who chose this method of reporting.</p>
Centrica	Yes	Yes. Both the removal of REMIT submissions via MODIS and the implementation of outage profile reporting would be more complex and create additional cost. Please see our answer to Question

Respondent	Response	Rationale
		11 on the cost impact.
EDF Energy	Yes	<p>Removal of REMIT submissions via MODIS</p> <p>As stated in Q7, a move away from this interface would waste previous investment and would incur additional analysis, design, development and testing costs. These costs would be in the order of £34K.</p> <p>Outage Profile Reporting</p> <p>As stated in Q6, as this is optional, there would be no mandatory impact. However, we support the option of including Outage Profile Reporting, which would simplify ongoing submission processes. We anticipate there would be some additional analysis, design, development and testing to implement this functionality in the order of £33K.</p>
National Grid	Yes	-

Question 11: Will your organisation incur any costs in implementing P329?

Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

Responses

Respondent	Response	Rationale
RWEST	Yes	minimal cost impacts
National Grid Interconnectors limited	Yes	See our response to question 10.
E.ON	Yes	<p>We have not been able at this stage to identify specific costs for developing our information systems to interface with any new requirements of MODIS, however we would clearly expect to incur system development costs to facilitate new requirements.</p> <p>In addition we have not been able to assess cost impacts of developing systems to replace MODIS if this option were pursued, however we would not expect costs to be insignificant both in terms of development of a new system to replace MODIS for REMIT reporting and ongoing support of two systems instead of one.</p>
Drax Power Limited	Yes	Please see answer to question 10 above.
Centrica	Yes	Yes Centrica will incur systems change costs and temporary additional risks from submitting different data to ACER and to BMRS between July 2016 and February 2017.
EDF Energy	Yes	As detailed in Q10, in summary, we will potentially incur costs if we needed to re-point to Elexon's REMIT interface, align with new schema and add outage profile reporting. Likewise, though out of scope of P329, it is assumed that we would incur similar or slightly lower costs to align to the new REMIT schema and add outage profile reporting via National Grid's MODIS system. These costs are forecast to amount to change in the order of £100K , depending on how they are delivered and to what timescales etc.

Respondent	Response	Rationale
National Grid	Yes	-

Question 12: Do you agree with the Workgroup's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
4	3	0	0

Responses

Respondent	Response	Rationale
RWEST	No	ACER requirement is for 7 July 2016
National Grid Interconnectors limited	Yes	-
E.ON	Yes	For the BSC system development reasons given in the consultation.
Drax Power Limited	No	Please see answers above. However, P329 should not be rejected on this basis as, regardless of implementation date, this modification needs to be implemented in order for compliance with ACER requirements.
Centrica	Yes	Whilst there would be efficiencies in aligning P329 implementation with ACER's 7 July 2016 deadline for market participants to provide data in the ACER data format, we recognise the lead-time for this would not be practical. 23 February 2017 appears to be a sensible Implementation Date.
EDF Energy	No	The ideal implementation date for would be ACER's stated implementation date of 07/07/2016. This would provide transparency across the whole GB Market. Staggered implementation dates by different parties (MPs, National Grid and Elexon) will introduce additional risk and necessitate the publication of two sources of slightly different REMIT data until P329 is introduced.
National Grid	Yes	We note the ACER requirement for data in the revised format to be sent to them via web feeds from July 2016. However, we agree with the recommended Implementation Date as experience has shown that successfully implementing significant changes to multiple IT systems across the industry is dependent on sufficient time being allowed (e.g. to include appropriate end-to-end testing of the solution).

Respondent	Response	Rationale

Question 13: Do you envision any risks or issues due to the P329 Implementation Date being later than the new REMIT Reporting Start Date?

Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

Responses

Respondent	Response	Rationale
RWEST	Yes	<p>Market Participants still need to meet the 7TH July 2016 and will need to provide ACER with alternates. This will require all GB participants to update CEREMP to change field 120 from the Elexon website to whatever is appropriate.</p> <p>Question : once changed and operational with ACER can it be changed back to Elexon?</p> <p>Ideally we need a written letter from OFGEM/ACER to allow a delay to GB market participant web feeds to February 2017 or a pragmatic evolutionary approach that could deliver the web feeds for July.</p>
National Grid Interconnectors limited	Yes	It would be ideal to be able to implement P329 at the same time as the new REMIT Reporting start date but we accept this would be very difficult to achieve in the timescales available.
E.ON	Yes	We agree with the issues identified in the consultation and support Elexon seeking confirmation from Ofgem and ACER.
Drax Power Limited	Yes	See above. Market participants will be required to make arrangements to cover the eight month gap.
Centrica	Yes	Yes there will be risks and inefficiencies involved in participants submitting different data to the BMRS (directly or via MODIS) and to ACER. However, we recognise that it would not be practical for Elexon to implement P329 for 7 July 2016. With 2017 Implementation Date, Elexon and National Grid should use the extended lead time to ensure that market participants are provided with a full end-to-end testing environment before P329 goes live.
EDF Energy	Yes	Due to the differences between the existing REMIT schema used by MPs and new ACER REMIT data specification, publications on our own REMIT website (and available to ACER via RSS / ATOM web

Respondent	Response	Rationale
		<p>feeds) will be slightly different to BMRS until P329 is delivered.</p> <p>Assuming the preference is to keep National Grid's MODIS interface for REMIT publications, time will be needed to complete their analysis, design, testing and deployment activities in co-ordination with Elexon, MPs and other interested parties. There is a risk that this could impact Elexon's proposed delivery timescales.</p>
National Grid	Yes	<p>There is a potential compliance risk as a result of how the ACER requirements are interpreted (i.e. Implementing Act vs Manual of Procedures) if their deadline is not achieved in relation to the format of the data sent via the BMRS web feed. This makes it important that the reasoning for the P329 Implementation Date is clearly provided to the appropriate parties and that this risk is mitigated where possible (e.g. by ensuring the reliability of the current BMRS web feed).</p>

Question 14: Do you have any further comments on P329?

Summary

Yes	No
2	5

Responses

Respondent	Response	Comments
RWEST	No	-
National Grid Interconnectors limited	No	-
E.ON	No	-
Drax Power Limited	Yes	<p>While Drax understands the difficulties imposed by the new obligations it is necessary for the BMRS to react to the changes in ACER's requirements in order to remain effective as a national platform.</p> <p>However, we have concerns that if the BMRS is not flexible enough to adapt to ACER's timescales then the industry may lose faith in the BMRS as a central reporting platform for the purposes of REMIT. This is unfortunate as we support the use of the BMRS as a central reporting platform.</p>
Centrica	Yes	<p>We would like to reiterate a couple of points.</p> <ul style="list-style-type: none"> We would like to stress the importance of giving market participants access to a full end-to-end testing environment (including co-ordination across both National Grid's MODIS and Elexon's test systems) well before P329 goes live. We have a strong preference to utilise the ACER schema for REMIT submissions to BMRS rather than create a new one specific to UK Power. Diverging from the format specified by ACER (e.g. by introducing outage profiles) appears to defeat the purpose of creating a common schema and requires participants to maintain different message formats for different countries/commodities. This appears inefficient and to undermine the benefits of a common format. We would like confirmation that the

Respondent	Response	Comments
		European Transparency Regulation (ETR) interface between MODIS and BMRA is not impacted. So that, even if the decision was taken to remove the interface for REMIT, then the existing interface for ETR remains.
EDF Energy	No	None at this time.
National Grid	No	-