

## P243 Consultation Responses

Consultation issued on 2 October 2009

We received responses from the following Parties

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
SAIC Ltd. (for and on behalf of ScottishPower)	7/10	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
PCE Investors	0/2	Trader/investment services
Centrica	10/0	Supplier/Generator/Trader
RWE Supply & Trading GmbH	10/0	Supplier/Generator/ Trader / Consolidator / Exemptible Generator / Party Agent
LDHE Energy Services	0/1	Trader
Intergen (UK) Ltd.	3/1	Generator/Trader
National Grid	1/0	Transmission Company
Scottish and Southern Energy	9/0	Supplier / Generator
EDF Energy	13/0	Supplier/Generator/Trader/Consolidator/Exemptible Generator/Party Agent/Distributors
E.ON UK	6/0	Supplier / Generator / Trader / Consolidator / Exemptible Generator
International Power	6/0	Trader/Generator

Question 1: Would the Proposed Modification P243 help to achieve the Applicable BSC Objectives?

### Summary

Yes	No	Neutral/Other
8	2	1

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## Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	Yes	<p>BSC Objective C is applicable for this Proposed Modification.</p> <p>The Provision of Output Usable Data may enable new entrants or smaller Parties make more informed decisions about the fuel type driving the generation plant scheduling. However, cognizance must be taken of the differences between Outturn Data and Output Usable Data, noting that these are not directly comparable. The proposed "health warnings" on the relevant web pages will help address this issue.</p>
PCE Investors	Yes	Objective C: Extra transparency will aid competition
Centrica	No	<p>Centrica believes that the Proposed Modification is finely balanced due to the positive impacts of publishing the information weighed against the discrimination due to the inequitable Party disclosure from the aggregation of the data.</p> <p>Centrica supports the publication of additional information to the market. The increased level of transparency would be beneficial to new entrants and small parties who do not have the resource to make accurate forecasts of availability information themselves. The ability for such parties to make better informed decisions would help to increase competition thus better facilitate objective (c).</p> <p>However, the level of aggregation by fuel type would be inequitable as certain fuel types have a very limited number of generators. This would mean that a lower degree of anonymity for those generators in that fuel type allowing greater information on such parties trading position. This would constitute a degree of discrimination that is difficult to justify as being due. Such arrangements would have a detrimental impact on competition.</p> <p>Centrica believes that, in this instance, the detrimental impact of inequitable information publication would outweigh the benefits stated above.</p>
RWE Supply & Trading GmbH	Yes	We endorse the views expressed by the P243 Modification Group.
LDHE Energy Services	Yes	The proposed modification will better facilitate BSC Objective (c), related to promoting effective competition in the generation and supply of electricity, and promoting such competition in the sale and purchase of electricity, by improving accessibility and transparency of information on likely availability of generation capacity by fuel type.

Respondent	Response	Rationale
Intergen (UK) Ltd.	Yes	Both Proposals would achieve the BSC objective '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' however the Alternative proposal would deliver a greater level of transparency thereby aiding competition.
National Grid	Yes	Increase in information transparency and availability of improved market information to all participants should promote effective competition in the generation and supply of electricity (Applicable BSC Objective (c)). Provision of more consistent and transparent information should improve self-balancing and allow market participants to manage electricity related costs and risks; this should, in turn, improve the efficient, economic and co-ordinated operation of the GB transmission system (Applicable BSC Objective (b)).
Scottish and Southern Energy		<p>We have concerns regarding the suggested 'defect' which P243 is attempting to address. The P243 defect is stated as being:-</p> <p>"The future availability of a Plant/Generator availability cannot easily be viewed due to lack of published data. Allowing publication of relevant data will enable information on potential prices of electricity, the availability of different fuel types, the potential to switch from one fuel source to another and any strategic decisions on generation can be made."</p> <p>It seems to us (assuming P243 were to be implemented) that there is a distinct risk that stakeholders in looking at this information will make false assumptions about "the availability of different fuel types, the potential to switch from one fuel source to another and any strategic decisions on generation".</p> <p>In this regard we are mindful of the defect identified in a similar Modification Proposal P226 which, like P243, was related to generator information.</p> <p>In particular, the P226 defect included:-</p> <p>"In addition there have been instances where BSC Parties have made wrong assumptions about likely plant availability because they were unaware of derogations applied for Opted In LCP Units...."</p> <p>If P243 were to be implemented then all stakeholders</p>

Respondent	Response	Rationale
		<p>need to understand and appreciate that if they make assumptions based on the data provided then their assumptions may well, on reflection be false or wholly incorrect.</p> <p>The Generator, in providing the original information to National Grid, gives no warranty to any stakeholder who chooses to use that information for any other purpose. Stakeholders need to recognise that the information provided by the Generator relates to as physical asset which means that information provided even relatively recently might, in accordance with the laws of physics and engineering, now no longer be accurate.</p> <p>Given this we cannot, at stage, indicate if P243 will, or will not, better achieve the applicable BSC Objectives.</p> <p>ELEXON contacted the respondent and clarified that this concern was discussed in the P243 Modification Group meetings. The Group agreed that there will be disclaimers/explanations which explain what the data is and highlight that the data published is to be used at a Party's own risk. The respondent is satisfied with the clarification provided.</p>
EDF Energy	No	<p>Publication of aggregate forecast output usable data in the categories proposed would unduly discriminate against some parties. In particular, for the categories of nuclear, pumped storage, and possibly non pumped storage hydro, submitting OC2 data, it would not be difficult for some or all parties to determine the future availability plan for individual parties and probably individual generators, in conjunction with the zonal data already published. By contrast, the availability plans of parties and generators within a larger grouping of coal and gas would not be visible. This discrimination raises concerns that some parties could somehow unfairly exploit information available about other parties, without revealing their own individual future plans. In the Netherlands, the single nuclear and single biomass plant are aggregated into the coal category specifically to avoid such issues ( <a href="http://www.productiondata.nl/index.php?page[]=2">http://www.productiondata.nl/index.php?page[]=2</a> ).</p> <p>This disadvantage would act against achievement of BSC Objective (c) relating to competition, and despite other unquantifiable benefits of general market transparency described by the proposer, when taken together with the considerable costs of the proposal,</p>

Respondent	Response	Rationale
		<p>on balance we think the proposal would not better meet BSC objectives.</p> <p>(The full list of categories is: (a) CCGT Modules; (b) Oil Plant; (c) Coal Plant; (d) Nuclear Plant; (e) Power Park Modules; (f) Pumped Storage Plant; (g) Non Pumped Storage Hydro Plant; (h) Open Cycle Gas Turbine Plant; (i) External Interconnection flows from France to England; (j) External Interconnection flows from Northern Ireland to Scotland; and (k) a single category containing any other generation not covered by (a)-(j) above.)</p>
E.ON UK	Yes	<p>Publishing nationally aggregated forecast Output Usable data by fuel type would help to increase the transparency of GB market data, potentially supporting BSC objectives (b) and (c). Potentially as the group identified, if generators of different fuel types in aggregate spread their outage periods, and if participants made better-informed decisions, electricity prices might be better reflective of market conditions, and efficient and economic operation of the GB Transmission System advanced. However, there is a risk of gaming (against Licence conditions) i.e. Parties changing operational plans based on published data, which would have the opposite effect; also, the risk that an innocent Party could be falsely accused of gaming. Any impact on competition or liquidity also seems unlikely to be significant, as related data such as MELs are already in the public domain, and given the inherent uncertainties in forecast data (although 'best estimate' when provided). As the Proposer agrees, publishing further/more detailed data may also conversely lead to 'information overload', over-analysis and not necessarily aid efficient, economic decision-making. Similarly the discrepancies between Output Usable and Out-turn Generation though can be made clear on the web might lead to confusion.</p>
International Power	Yes	<p>We agree that P243 should help to better facilitate the Applicable BSC Objective C. We think that the benefit in publishing the data by fuel type would be in suggesting what the marginal fuel type might be and when a fuel switch might occur. This should allow Parties to make more informed trading decisions and thereby increase competition. This benefit is tempered however by the fact that the fuel types proposed would make the plans of certain types of generator more visible than others due to the limited number of parties operating within certain categories. We think that this could be addressed by aggregating some of the fuel types. We think that the provision of this data by fuel type, corresponding to the publication of out turn data</p>

Respondent	Response	Rationale
		on the BRMS, provides a reasonable balance between transparency and usability – we do not believe additional benefits could be achieved by publishing the data at the level of BM unit. This would represent an unnecessary level of information for establishing the likely marginal fuel, which would be more problematic for smaller parties. We would like to stress our view that publication of the data on the BMRS alongside the Out turn data must be accompanied by an appropriately worded “health warning”. The availability data is provided to NG on a best endeavours basis and represents a generator’s best view of availability when submitted. There are numerous legitimate reasons why this may change over time.

## Question 2: Would the Proposed Modification as detailed in section 3 of the detailed assessment impact your organisation?

### Summary

Yes	No	Neutral/Other
8	3	0

### Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	No	All of the information required is already provided to the National Grid, so no additional data feeds are required. There might be a systems impact for ScottishPower, depending upon the potential changes to the TIBCO messages.
PCE Investors	Yes	Objective c: It would have a positive impact on our ability to trade UK power
Centrica	Yes	We would have to ensure that our systems are capable of receiving the new TIBCO messages. Whilst we do not have exact estimates, this would be no more than £26,000 and require no more than 3 months from receipt of the detailed changes from Elexon after Authority approval.
RWE Supply & Trading GmbH	Yes	We would develop systems to collect the information provided.
LDHE Energy Services	No	-
Intergen (UK) Ltd.	Yes	Internal applications may need modifying as a result of the proposed modification however Intergen would

Respondent	Response	Rationale
		regard this as a small negative impact in comparison to the greater perceived benefit of increased transparency of the market.
National Grid	Yes	P243 will have a significant impact on National Grid's BM (Balancing Mechanism) and TOGA (outage database) systems. Details of these impacts have been provided as part of the P243 Transmission Company Analysis.
Scottish and Southern Energy	Yes	We will be impacted by this proposed change.  We will need to reconfigure our systems to take account of the switching of information from the BSC Website to the BMRS.  We will need to develop new systems / change our existing systems to take account of the new information to published (generation by fuel type plus 2-14 and 2-52 etc.).
EDF Energy	Yes	System and procedure changes would be required to process, analyse and act on the new data stream.
E.ON UK	No	As no further obligations are placed on Parties further to their submissions under Grid Code OC2.
International Power	Yes	Resource for making necessary changes to market/trading tools

Question 3: The Group have suggested a Potential Alternative solution as detailed in Section 4 of the detailed assessment.

Would this **Potential** Alternative help to achieve the Applicable BSC Objectives compared to the current baseline?

### Summary

Yes	No	Neutral/Other
7	3	1

### Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	No	The Potential Alternative Modification would not achieve any of the BSC Objectives. Does not meet BSC Objective C: It could be argued as anti-competitive for the companies with a small number of generation units as their complete generation schedule could be calculated by other Parties. Such information could be advantageous to Parties with a larger, diverse generation portfolio. The increased volume of data will not be beneficial to a

Respondent	Response	Rationale
		number of smaller Parties or New Entrants as more detailed analysis will be required to determine the aggregated market position of fuel types. This will be an increased overhead to Parties for no obvious benefit.
PCE Investors	Yes	Objective C: This alternative increases the level of transparency further
Centrica	Yes	Centrica believes that the potential Alternative would amplify the benefits of the original proposal due to the extra information disclosure. It would also remove the concern over discrimination as there is no aggregation of data putting all Parties in the same situation. This would therefore better facilitate competition when compared to the baseline and when compared to the proposed modification. Centrica also believes that the risk of gaming to be the lowest under the potential alternative. Any behaviour which would constitute a licence breach would become more apparent with additionally transparency. The potential alternative increases the industries ability to monitor such behaviours and make the appropriate bodies aware of any inappropriate behaviour. This would also better facilitate objective (c)
RWE Supply & Trading GmbH	Yes	We support the publication of BMU Specific Output Usable data as we believe that this would better facilitate competition (Objective C) since it would improve the availability of information in the GB electricity market
LDHE Energy Services	Yes	-
Intergen (UK) Ltd.	Yes	The Alternative would provide a greater level of transparency and would therefore assist in developing a better appreciation of the market.
National Grid	Yes	The potential Alternative proposes to provide the forward availability information at a more detailed level i.e. by BM Unit. As a matter of principle, greater transparency provided by increased granularity of data provides better market signals to all participants (including small players and new entrants). This promotes competition and efficient market operation (Applicable BSC Objective (c)). National Grid has some concern that publishing the detailed information, that National Grid presently receives to manage the system may have unintended consequences and potentially adverse impact the efficient and economic operation of the National Electricity Transmission System (NGET). Specifically, National Grid would be concerned if publishing such commercially sensitive information led to deterioration in the quality or timeliness of Grid Code OC2 data.

Respondent	Response	Rationale
		<p>Further, National Grid would be concerned if such information were able to inform parties of potential market power (specifically locational) if such market power was abused.</p> <p>Equally, National Grid considers that the potential Alternative could also have beneficial impact. Greater transparency at BM Unit level would enable industry greater scrutiny of such information; this may act as a deterrent to any reduction in the quality, timeliness or any potential abuse of market power from having detailed Grid Code OC2 data. Ultimately, any unintended consequences could be addressed by other means (e.g. licence obligations);</p> <p>On balance, National Grid therefore considers that the potential Alternative could also facilitate Applicable BSC Objective (b).</p>
Scottish and Southern Energy	-	See Q1 above,
EDF Energy	Yes	<p>Output usable reveals more about the expected operation of some BM Units than it does for others, particularly baseload units, and is discriminatory against operators with a concentration of such BM Units.</p> <p>However, by additionally publishing the output usable for all BM Units for which it is available, transparency would be improved without introducing the level of information discrimination described above for the proposal.</p> <p>Also, the additional transparency over and above the proposal should add confidence that movements of availability of individual units were not somehow taken unfairly in response to outages or operation of other units.</p> <p>It would also maximise the information available for price forecasting, by allowing the estimated costs of different types of generator within the broader categories to be considered.</p> <p>The publication of information by BM Unit would be consistent with publication by unit for markets in Germany, Scandinavia and the Czech Republic, and initiatives to increase transparency in other European markets.</p> <p>The additional central implementation cost over and above the proposal is relatively modest.</p> <p>On balance we think the alternative proposal would better meet BSC objective (c) relating to competition by better informing forecasts used in trading decisions, on an equitable basis, and thereby promoting trading</p>

Respondent	Response	Rationale
		liquidity. More information on future availability should also promote BSC objective (b) relating to efficient system operation, by allowing participants to optimise their outages relative to each other, and identify any unexpected outage behaviours.
E.ON UK	No	As stated under Question 1, publishing further/detailed data for 323 CVA BMU instead of 11 fuel types may actually lead to 'information overload' and possibly undue emphasis being placed on forecast data, not necessarily aid efficient economic decision-making by large or small market participants. Furthermore more crucially, publishing data at a BMU level would have a negative impact on competition, exposing all Parties' plans but particularly those/smaller Generators with fewer/one BMU(s). The risk of inappropriate use of the information/gaming, e.g. to capitalise on certain plant outages, would increase.
International Power	No	We do not think that receiving the Output Useable data by BM unit is necessary to realise the benefits to competition that might result in publishing this data by fuel type and agree that the volume of data could result in an "information overload, particularly for smaller parties, with less resource to dedicate to the analysis of the data. Further to this we believe that there may be discriminatory issues resulting from the publication of availability data at this level of resolution. For a generator with a single asset or small portfolio, an outage will have a greater impact (proportionally) on the company's trading position than for a larger player, and this will be visible to the market. We also think it should be noted that an unintended consequence of the potential alternative might be that the availability data becomes less accurate as parties become slower to firm up outage plans because of the visibility their disclosure would have on trading positions.

Question 4: Would the **Potential** Alternative Modification as detailed in section 4 of the detailed assessment impact your organisation?

### Summary

Yes	No	Neutral/Other
10	1	0

### Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	Yes	It is likely that there will be a systems impact for ScottishPower, depending upon the potential changes to the TIBCO messages. This is due to the increased level of detail and volume of data within the messages. The complexity involved and the time/cost associated is unknown at present.
PCE Investors	Yes	As question 2
Centrica	Yes	As for the proposed in Q2. However there is likely to be marginally larger costs due to the increase data handling.
RWE Supply & Trading GmbH	Yes	We would develop systems to collect the information provided.
LDHE Energy Services	No	-
Intergen (UK) Ltd.	Yes	In no greater way than the Proposed modification.
National Grid	Yes	The potential Alternative Modification will have a significant impact on National Grid's BM (Balancing Mechanism) and TOGA (outage database) systems. Details of these impacts have been provided as part of the P243 Transmission Company Analysis. Compared with the Proposed Modification, the potential Alternative Modification is likely to have a greater impact on TOGA (outage database). Details of these impacts have been provided as part of the P243 Transmission Company Analysis.
Scottish and Southern Energy	Yes	We will be impacted by this proposed change. This impact would be greater than with the Proposed as it would require the addition of functionality to take account of BM Unit level data (which is not currently part of our IT systems).  We will need to reconfigure our IT systems to take account of the switching of information from the BSC Website to the BMRS.  We will need to develop new IT systems / change our existing IT systems to take account of (i) the new information to published (generation by fuel type plus 2-14 and 2-52 etc.) and (ii) at BM Unit level.
EDF Energy	Yes	System and procedure changes would be required to process, analyse and act on the new data streams.
E.ON UK	Yes	No insofar as the data is already submitted to National Grid but yes in that releasing BMU-level data would expose confidential commercial data.
International Power	Yes	Resource for making necessary changes to market/trading tools

Question 5: Do you prefer the Proposed Modification (see section 3 of the detailed assessment) or the **Potential** Alternative Modification (see section 4 of the detailed assessment)?

**Responses**

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	Proposed	The Proposed Modification is preferred, in line with responses given above.
PCE Investors	Potential Alternative	Even higher transparency helps new entrants further
Centrica	Potential Alternative	See response to Q3.
RWE Supply & Trading GmbH	Potential Alternative	Improved information transparency on BMU output useable would better facilitate trading in the GB electricity market.
LDHE Energy Services	Potential Alternative	While we view that the data published under the proposed modification as being sufficient, we think that the market should have access to the underlying data. This level of detail is consistent with that provided in other European power markets. Furthermore this level of information is necessary to insure the self-regulation of the UK Power market
Intergen (UK) Ltd.	Potential Alternative	Intergen prefers the Potential Alternative Modification as it provides greater granularity and transparency than the proposed modification. The Alternative would take away any perceived discrimination against parties in less populated fuel type categories
National Grid	Potential Alternative	Whilst recognising some of the issues raised in our response to question 3 and any potential further consideration that may be needed to overcome these issues, the more granular provision of forward availability under the Alternative could facilitate the BSC Objectives better than the Proposed modification.
Scottish and Southern Energy	No	See answers to Q1 and Q3 above.
EDF Energy	Potential Alternative	We prefer the potential Alternative Modification for the reasons given in response to questions 1 and 3 above.
E.ON UK	Proposed	As above publishing data for all BMU as the potential Alternative suggests would be discriminatory to smaller generators, not necessarily be beneficial to users, would not be directly comparable with Out-turn data, and could actually increase the possibilities for gaming.
International Power	Proposed	We prefer the proposed over the potential alternative because – <ul style="list-style-type: none"> <li>Notwithstanding our preference for transparency the</li> </ul>

Respondent	Response	Rationale
		<p>possible alternative would have the potential to expose the position of an independent/smaller generator disproportionately to that of the larger portfolio players</p> <ul style="list-style-type: none"> <li>We also agree that the volume of data could create problems in itself, especially for smaller parties with less resource.</li> </ul>

Question 6: Does the publication of national BM Unit Output Usable data create any confidentiality issues for your organisation if:

a) Output Usable data is aggregated by fuel type; or

b) Output Usable data is published for each BM Unit (no aggregation).

#### Summary 6a

Yes	No	Neutral/Other
4	7	-

#### Summary 6b

Yes	No	Neutral/Other
5	6	-

#### Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	Question 6a: No	The Output Usable Data (aggregated by Fuel Type) would be provided in a format similar to that of Outturn Data – as requested by the Proposer. Since the data will be aggregated at a national level - and so give a complete market picture – it would be extremely difficult to identify individual generation plant for a majority of fuel types. Hence there should be no issues of confidentiality.
	Question 6b: Yes	Detailed information at the BMU level will breach current commercial confidentiality agreements and thus potentially compromise contractual agreements. This in turn could cause a change to the generation profile, systems balancing, etc.
PCE Investors	No to either	We have no BM units
Centrica	Question 6a: Yes	Yes. Centrica believes that the aggregation of data is not sufficient to maintain equitable information disclosure. Centrica supports publication of additional

Respondent	Response	Rationale
		information where this is equitable. As noted in our response to Q1, whilst having this concern, we would still support the modification due to the perceived benefits outweighing the costs.
	Question 6b: No	No. Centrica is comfortable for BM Unit level disclosure as this would be an equitable solution.
RWE Supply & Trading GmbH	Question 6a: No	There are no confidentiality issues for RWE.
	Question 6b: No	There are no confidentiality issues for RWE.
LDHE Energy Services	Question 6a: No	-
	Question 6b: No	-
Intergen (UK) Ltd.	Question 6a: No	The Output Usable Data, in any form, would not create any confidentiality issues for Intergen as many market participants already analyse the data currently published to infer specific plant availability. This would make the information available to all thereby improving transparency which in turn helps to reduce barriers to entry for new market participants.
	Question 6b: No	Response as above in 6a.
National Grid	No	-
Scottish and Southern Energy	Question 6a: Yes	For certain fuel types, such as hydro and pump storage, it may be possible for our confidential commercial position to be divulged. This would lead to our confidential commercial position being divulged.
	Question 6b: Yes	
EDF Energy	Question 6a: Yes	While most companies would probably prefer confidentiality if possible, there is more transparency of participant activities in the electricity market than most other markets, and regulatory concerns about market operation, whether justified or not, seem to make further transparency inevitable. Output Usable data aggregated by fuel type would reveal the outage plan for some parties and (in conjunction with nationally and zonally aggregated data already published) for some BM Units, but not others. This discriminatory loss of confidentiality is unacceptable.
	Question 6b: Yes	As described previously, publishing data by BM Unit would ease concerns about discrimination between parties and BM Units, and seems inevitable given the transparency in other European markets and apparent aspirations of European regulators.
E.ON UK	Question 6a	No
	Question 6b: Yes	Yes, Publication by BMU would breach confidentiality & be commercially unacceptable. It would also not necessarily be helpful to users for reasons stated

Respondent	Response	Rationale
		above; though it would be transparent it would not necessarily lead to efficient or economic decision-making as e.g. participants might attempt to exploit known outages.
International Power	Question 6a: Yes	We believe that the availability of our PS assets may be more visible than, for example, individual gas or coal fired assets, however this is already the case because of these units' 'unusual' size so we do not believe the publication by fuel type would lead to any greater confidentiality issues. As noted above this issue could be addressed by aggregating the data in different categories.
	Question 6b:Yes	We are concerned that this could lead to greater confidentiality issues for smaller parties or those with one asset, when compared to large portfolio players.

**Question 7: Section 5 of the detailed assessment outlines the Modification Group's discussions on whether the publication of Output Usable data creates discrimination issues to fuel types with low numbers of Generators and where a Generator may have a single BM unit. Do you believe that there are any discrimination issues under the:**

- a) Proposed Modification?
- b) Potential Alternative Modification?

#### Summary 7a

Yes	No	Neutral/Other
7	4	-

#### Summary 7b

Yes	No	Neutral/Other
6	5	-

#### Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	Question 7a: No	If Output Usable Data is provided at the national level, it would be extremely difficult to identify individual generation plant for a majority of fuel types.
	Question 7b: yes	Providing information at the BMU level will by definition enable all Parties to identify the generation for each other Party. This is unlikely to be an issue for Parties

Respondent	Response	Rationale
		with a large generation portfolio (as the Party can decide which type of generation plant to schedule) but could leave Generators with a small number of plants disadvantaged. "Smaller" Generators would effectively be publishing their schedule, enabling "larger" Generators to manage their portfolio to take advantage of this information.
PCE Investors	Question 7a: Yes	Some generators can be more easily identified than others – this is another reason why the alternative is better
	Question 7b: No	Clearly all BMs are treated the same
Centrica	Question 7a: Yes	Yes. As detailed in Q1 response above.
	Question 7b: No	No. It is not clear how a Party with a single BM Unit would have greater information disclosed about it than other Party's with multiple BM Units. Multiple BM Units could still be added to obtain the Party availability.
RWE Supply & Trading GmbH	Question 7a: No	There are no confidentiality issues for RWE.
	Question 7b: No	There are no confidentiality issues for RWE.
LDHE Energy Services	Question 7a: No	This seems to be the minimum requirement amongst neighbouring European markets. As the UK is electrically interconnected with the continent it does not make much sense to have differing levels of transparency.
	Question 7b: No	The current situation means that only market participants with sufficient financial resources can approximate this level of data. The release of this data to all participants would do allot to level the playing field by providing all participants with the same level of information.
Intergen (UK) Ltd.	Question 7a: Yes	Yes, the Proposed Modification could be seen to discriminate against parties within less populated fuel type categories.
	Question 7b: No	No, All parties would be treated equally and would therefore not face discrimination.
National Grid	Question 7a: Yes	National Grid acknowledges that there may be potential discrimination issues where there are a small number of generators in one fuel type category. As System Operator of the national electricity transmission system, National Grid is not sure about the extent of discrimination that the Proposed Modification may pose.
	Question 7b: Yes	National Grid acknowledges that there may be potential discrimination issues where a generator (unlike portfolio players) only has a single

Respondent	Response	Rationale
		BM Unit. As System Operator of the national electricity transmission system, National Grid is not sure about the extent of discrimination that the Proposed Modification may pose.
Scottish and Southern Energy	Yes for both	For the reasons shown in Q6a and Q6b
EDF Energy	Question 7a: Yes	Yes, see responses to previous questions 1, 3 and 6
	Question 7b: Yes	Output usable reveals more about the expected operation of some BM Units than it does for others, particularly baseload units, and is discriminatory against operators with a concentration of such BM Units. However, by publishing the output usable for all BM Units for which it is available, transparency would be improved without introducing the level of information discrimination which exists for the proposal.
E.ON UK	Question 7a: No	No – nationally aggregated data means that even where only one or two operators run certain fuel types, the plans of individual plant are unlikely to be exposed any further than they already are from publication of MELs.
	Question 7b: Yes	The potential Alternative would be discriminatory towards smaller generators operating only one plant compared with larger companies that may have a portfolio of several power stations (whether of the same fuel type or not)
International Power	Question 7a and 7b: Yes	There are potential discrimination issues under both the proposed and potential alternative, however it should be noted that under the current arrangements, where Output Useable data is published by zone that the forecast availability of some units is already more visible than others. For example, it is not difficult to assess what the outage plans of units in Zone A which only contains three stations. Also, units at certain stations have a 'distinctive' generation capacity making them more visible in the data as published presently. We believe that the discrimination issues would be potentially greater under the potential alternative inasmuch as this change would make the positions of generators with smaller portfolios proportionally more visible than those of the large portfolio players

Question 8: Are there alternative solutions that the Modification Group has not identified, that they should consider?

**Summary**

Yes	No	Neutral/Other
1	9	1

**Responses**

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	No	-
PCE Investors	Yes	Possibly all generators should be obliged to publish their outage programmes in the interests of transparency
Centrica	No	-
RWE Supply & Trading GmbH	No	-
LDHE Energy Services	No	-
Intergen (UK) Ltd.	No	-
National Grid	No	-
Scottish and Southern Energy	No	-
EDF Energy	-	None identified.
E.ON UK	No	-
International Power	No	-

Question 9a: Do you support the Implementation approach as described in section 5 of the consultation document?

**Summary**

Yes	No	Neutral/Other
10	1	-

**Responses**

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf	Yes	

Respondent	Response	Rationale
of ScottishPower)		
PCE Investors	No	It seems an extra-ordinarily slow timescale for a quite simple data processing change
Centrica	Yes	-
RWE Supply & Trading GmbH	Yes	-
LDHE Energy Services	Yes	Neighbouring countries have been publishing equivalent data for years.
Intergen (UK) Ltd.	Yes	-
National Grid	Yes	National Grid agrees with simultaneous implementation of P243 and P244 as part of a standard release, as this approach is the most efficient option.
Scottish and Southern Energy		Our comments on implementation are shown in our answer to Q9b below.
EDF Energy	Yes	9 months notice should be sufficient to make necessary system and process changes. (Consultation indicates provisionally implementation in: <ul style="list-style-type: none"> <li>• November 2010 if the Authority approves P243 by end of January 2010; or</li> <li>• February 2011 if the Authority approves P243 by end of May 2010.)</li> </ul>
E.ON UK	Yes	Yes, implementing promptly but with P244 if both modifications were approved to achieve cost-savings would be most efficient.
International Power	Yes	-

Question 9b: Would publishing Output Usable data by fuel type in November 2010 (winter) create any issues/problems to your organisation, as opposed to publishing this information in February 2011 (spring)?

### Summary

Yes	No	Neutral/Other
3	6	2

### Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of	Yes	The November 2010 publication date may reveal ScottishPower's outage plans.

Respondent	Response	Rationale
ScottishPower)		
PCE Investors	No	-
Centrica	Conditional no	The critical point for being able to accommodate changes is when Elexon provide Parties with the detailed Business Requirement Specification (post approval). Providing Centrica receives this 3 months prior to November 2010, then this should be fine.
RWE Supply & Trading GmbH	No	-
LDHE Energy Services	No	-
Intergen (UK) Ltd.	No	Publishing the Output Usable data from the earlier date of November 2010 would not create any problems for InterGen. As this modification improves transparency in the market, it should be progressed and implemented as soon as practicable.
National Grid	Yes	National Grid considers that, given the lead times for implementing system changes to both Logica and National Grid systems, it may be necessary to consider implementation in the February 2011 release should implementation in November 2010 release be not achievable.
Scottish and Southern Energy	Yes	As we have indicated in our response to Q1 above, false assumptions will be made by stakeholders using the information published as a result of P243 being implemented. Over time, hopefully, stakeholders will learn from their mistaken assumptions and therefore adjust for them. Having this being undertaken during the winter period (if it were published in the November release) might increase market uncertainty which may be considered an issue. The effect of such as issue would be less if the release were in February.
EDF Energy	-	The main issue affecting implementation cost is the notice period given. Longer notice periods are easier and cheaper to manage alongside other ongoing changes.
E.ON UK	No	-
International Power	No	-

Question 10: The Modification Group has found it difficult to quantify the benefits of increased transparency of Output Usable data to the GB Markets (section 6 of the consultation document). Are there any cost savings/quantifiable benefits of being able to access the Output Usable data (forward availability of Generation) under P243 to your organisation?

### Summary

Yes	No	Neutral/Other
1	7	3

### Responses

Respondent	Response	Rationale
SAIC Ltd. (for and on behalf of ScottishPower)	No	ScottishPower supports open market trading conditions. However, ScottishPower has the ability to model market data and as such has no need for the information being provided by this Proposed Modification. The costs are therefore high for no obvious benefit.
PCE Investors	No	It is hard to quantify the benefits but such changes will encourage new market entrants who will aid price discovery and decrease volatility. This must have very large potential benefits.
Centrica	-	Benefits arise from having the information more readily available rather than having to expend resource trying to infer the information from data currently in the market combined with assumptions. It is difficult to quantify these benefits. Similarly it is difficult to quantify the detrimental impact on competition arising from undue discrimination.
RWE Supply & Trading GmbH	-	We believe that publication of the data would improve transparency in the GB electricity market and better facilitate trading opportunities. This should result in an electricity price that better reflects market fundamentals.
LDHE Energy Services	Yes	Costs occurring when deriving similar information from output usable data by zone and historical generation pattern can be avoided. Costs caused by the uncertainty in the forecasts when constructed using existing data sources drop out.
Intergen (UK) Ltd.	No	-
National Grid	No	National Grid already has access to the forward availability data and hence there are no direct benefits for National Grid as a consequence of P243.
Scottish and Southern Energy	-	It is not clear to us that there are quantifiable benefits.

Respondent	Response	Rationale
EDF Energy	No	-
E.ON UK	No	Doubtful that any cost savings could be achieved from decisions based on forecast data which is subject to change, and particularly if further data publication requires more resources to analyse.
International Power	No	-

## Question 11: Do you have any further comments on P243?

### Responses

Respondent	Response
SAIC Ltd. (for and on behalf of ScottishPower)	The costs to implement this change do not produce any obvious financial benefits for any of the current or new market participants. ScottishPower supports the drive to a more open and competitive market but questions the value of providing the Output Usable Data as a comparison to Outturn Data given the concern that these data items are not directly comparable. If new market entrants use the comparison between the Output Usable Data and Outturn Data then this could provide a false or incomplete market view.
PCE Investors	No
Centrica	No
RWE Supply & Trading GmbH	No
LDHE Energy Services	No
Intergen (UK) Ltd.	InterGen is supportive of this and any modification which increases transparency in the market and in turn helps to lower barriers to entry for new market participants.
National Grid	No
Scottish and Southern Energy	<p>1)</p> <p>This response is based solely on the two consultation documents sent in the email of 2<sup>nd</sup> October 2009 @ 17:33. These two documents, of 12 and 19 pages respectively, do not, for example, include the Modification Proposal itself.</p> <p>What is the legal status of these two documents in terms of what, exactly, will be presented (in totality) to (i) BSC Parties to comment on (ii) the BSC Panel to recommend on and (iii) the Authority to opine on?</p> <p>What is the legal status of any documents that are 'associated' within these two documents?</p> <p>Will all such 'associated' documents form, legally, the complete Final Modification Report (a) that the BSC Panel members must read in coming to their recommendation and (b) the Authority must take into account in their decision making?</p> <p>If the answer is 'yes', has this been confirmed, in writing, from the</p>

Respondent	Response
	<p>Authority?</p> <p>ELEXON contacted the respondent and explained that the legal framework for progressing modifications to the BSC is established as part of Condition C3 of the Transmission Licence and the process for making modifications is set out in Section F of the BSC. Section F of the Code (including annex F1) details each of the phases of the Modification lifecycle and what information should be included in the reports to the Panel and the Authority, which includes the Modification Groups recommendations, consultation responses, legal text and implementation approach. This ensures that there is full transparency with the information that has been used in the progression of the Modification and for the Authority in reaching a decision on a Modification. The respondent confirmed that this was a generic question that was not specific to any particular Modification.</p> <p>2)</p> <p>Within the 'Background' section of the 'Detailed Assessment for P243' there is a statement to the effect that:-</p> <p>" the majority of countries provide Output Usable data broken down by Fuel type"</p> <p>This statement appears to be inaccurate.</p> <p>The opening part of this section of the report notes:-          " The aim of this section is to provide a high level summary of how Output Usable data by fuel type is presented in European countries"</p> <p>Europe can either be in the context of (i) the European Union or (ii) the geographic definition of Europe. The map provided by the proposer is clearly based on (ii) rather than (i). Either way the eleven nations shown as providing "Aggregated by Fuel Type" information do not constitute either (i) majority of the EU or (ii) the majority of the geographic definition of Europe.</p> <p>On a point of clarification, why is Portugal shown (in figure 1 of the 'Detailed Assessment for P243') as being a country where such information is "Aggregated by Fuel Type" yet not shown as such by the information provided by the proposer?</p> <p>Conversely, why is the Czech Republic shown in figure 1 as not providing "Aggregated by Fuel Type" , whilst the proposer indicates that they do?</p> <p>ELEXON contacted the respondent and agrees with the comments made above. As a result:</p> <ul style="list-style-type: none"> <li>○ We will rephrase the wording for the assessment report to make reference to 'a number of countries in Europe' rather than 'majority of countries'. I will aim to list the countries that provide this data in the assessment report.</li> <li>○ We envisage to update the map to include the Czech Republic</li> </ul>

Respondent	Response
	<p>as providing Output Usable data.</p> <ul style="list-style-type: none"> <li>○ We discussed this with the Proposer and we understand that Portugal and Spain have built a regional market named MIBEL (and do provide this data), but they are not sure where to find this data. Information about MIBEL can be found on this webpage:  <a href="http://www.edp.pt/EDPI/Internet/EN/Group/AboutEDP/HotIssues/IberianElectricityMarket/Default.htm">http://www.edp.pt/EDPI/Internet/EN/Group/AboutEDP/HotIssues/IberianElectricityMarket/Default.htm</a></li> </ul> <p>The respondent was satisfied with the explanations given.</p>
EDF Energy	We would not expect to have to pay to stop receiving the current service of zonally aggregated data being published on the Elexon website. If the data is instead published on the BMRS website as part of this proposal we would expect some savings from ceasing the existing Elexon website publication service.
E.ON UK	No
International Power	No