

BY EMAIL TO: ener-wholesale-markets@ec.europa.eu

6 December 2012

European Commission
DG Energy - ENER.B.2
'Internal Market II: Wholesale markets; Electricity and Gas'
Rue De Mot 24-26
B-1049 Bruxelles
Belgium

Dear Sir/Madam,

Response to your consultation: Implementation of a Data and Transaction Reporting Framework for Wholesale Energy Markets

This is ELEXON Limited's response to the above European Commission consultation.

What is ELEXON's interest in REMIT Data and Transaction Reporting?

ELEXON is the Balancing and Settlement Code (BSC) administrator for England, Scotland and Wales. We operate the balancing mechanism reporting and settlement arrangements (as well as imbalance settlement) for wholesale electricity in this part of the European Union.

Because of our role as administrator of reporting from the British balancing mechanism, and because we are separate from, and not controlled by the British TSO responsible for balancing (National Grid), we have a particular interest in the reporting of trades made in the balancing mechanism to ACER under REMIT. So we are responding to Questions 8 and 9 of the consultation.

Because we also currently supply some fundamental data to the ENTSO-E platform www.entsoe.net on behalf of National Grid, we are also responding to Question 15 of the consultation.

Response to Questions 8 and 9:

Do you agree that where one of the parties to a transaction organises the market place, that party should have sole responsibility for reporting the transaction?

Do you agree that where neither party to a transaction organises the market place, that both parties should separately remain responsible for reporting the transaction?

We strongly agree with the European Commission that where there are existing reporting systems, then these existing systems should be used for REMIT transaction reporting to ACER. The proposals should clearly permit and encourage this when there is a third party who already reports transactions.

For example, in Britain, although National Grid enters into trades on the British balancing mechanism from the set of bids and offers made available, it is not responsible for reporting such trades. ELEXON administers the reporting of trades on the balancing mechanism on a public website (www.bmreports.com) and through data provision to those who subscribe to our "high grade" reporting service. The data published includes bid and offer prices and volumes and trades made by

National Grid. In this case it would be appropriate to use these existing reporting mechanisms for REMIT.

We trust that making either the TSO solely responsible, or both parties to the balancing mechanism trade responsible for reporting, will not preclude the use of this existing third party system to report on their behalf.

Response to Question 15: Do you consider the items reportable under the draft electricity transparency rules envisaged by the Commission's consultation mentioned above sufficient for monitoring with regard to electricity fundamental data and which reporting channel(s) would you consider appropriate?

We have a comment on the second part of this Question, i.e. on reporting channels.

Currently we supply some fundamental data to the ENTSO-E platform www.entsoe.net on behalf of the British TSO and there has been a proposal that we should do this on behalf of National Grid under the proposed Guidelines on Fundamental Electricity Data Transparency. Where there are existing third party reporters, such as ELEXON, this should be recognised and allowed when deciding upon future arrangements for reporting channels.

Comment on the final report of the consultants

You also sought comments on the consultants' report.

Figure 3 of the consultants' Final Report shows imbalance settlement is carried out by the TSO, but it is important to ELEXON to clarify that this is not always the case. In Britain the administration of imbalance settlement, including the calculation of imbalances and imbalance prices, is not the responsibility of the TSO but of ELEXON and it is ELEXON's core business.

In conclusion

I hope you find these comments helpful. If we can provide any further information I can be contacted on +44-20-7380-4253 or by email steve.wilkin@elexon.co.uk.

Yours sincerely



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