

Stage 04: Report Phase Consultation Responses

P295 'Submission and publication of Transparency Regulation data via the BMRS'

This Report Phase Consultation was issued on 15 November 2013, with responses invited by 3 December 2013.

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
IBM UK Ltd for and on behalf of the ScottishPower Group	7/0	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
EDF Energy	10/0	Generator / Supplier / Party Agent / Consolidator / Exemptible Generator / Trader
E.ON	5/0	Supplier / Generator / Trader / Consolidator / Exemptible Generator
National Grid	1/0	Transmission Company

Question 1: Do you agree with the Panel's initial unanimous recommendation that P295 should be approved?

Summary

Yes	No	Neutral/No Response	Other
4	0	0	0

Responses

Respondent	Response	Rationale
IBM UK Ltd for and on behalf of the ScottishPower Group	Yes	None provided
EDF Energy	Yes	The benefit in terms of BSC objectives (b) concerning efficient system operation and (c) concerning competition are unproven, and very difficult to quantify. The central costs of order 645 £k make it difficult to justify under BSC objective (d) concerning efficient BSC administration. However, a "do nothing" option would apparently still require considerable and mandatory BSC central costs of order 545 £k to provide data to NGET in support of BSC Objectives (a) and (e) concerning NGET's licence conditions and EU regulations. Therefore only a small benefit is required under BSC Objectives (b) and (c) to result in a net benefit against BSC objectives.
E.ON	Yes	We agree that P295 should be approved; as with P291 for REMIT data, it is efficient to utilise existing channels and platforms to fulfil the requirements of the Transparency Regulation, so makes sense for the Transmission Company to submit data to the BMRA with onwards submission of that data to ENTSO-e accompanied by publication on GB's existing BMRS platform. The publication would improve transparency and accessibility of the data to GB market participants. While some parties might choose to view all data directly on the EMFIP, yet incur costs for establishing the P295 arrangements it is still not completely clear how easy it will be for users to view data on the European platform; it seems desirable to have the BMRS as a 'one-stop shop' for GB data that may be more practical for smaller parties in particular.

Respondent	Response	Rationale
National Grid	Yes	We agree with the workgroup view that the submission of Transparency data to EMFIP via Elexon and the publication of that data (on the BMRS) better meet the applicable BSC objectives.

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P295?

Summary

Yes	No	Neutral/No Response	Other
2	0	2	0

Responses

Respondent	Response	Rationale
IBM UK Ltd for and on behalf of the ScottishPower Group	Neutral	None provided
EDF Energy	No Response	We have not checked the legal text.
E.ON	Yes	It seems so. Probably best for the X1 definition of data to refer back to the Regulation as it now does.
National Grid	Yes	No further comment.

Question 3: Do you agree with the Panel's recommended Implementation Date?

Summary

Yes	No	Neutral/No Response	Other
3	0	1	0

Responses

Respondent	Response	Rationale
IBM UK Ltd for and on behalf of the ScottishPower Group	Neutral	None provided
EDF Energy	Yes	Yes, 16 December 2014 is before the EU deadline of 4 January 2015 and avoids implementation in late December, when resource are stretched, as originally suggested. Provided a firm decision is made by January 2014, as indicated in the assessment report, it would provide almost a year for central and participant system developments to accommodate or use the new data provided on BMRS. A delay between BMRA reporting to the EU platform, and reporting on BMRS reduces some of the benefits of the proposal and should be avoided.
E.ON	Yes	Implementation in its entirety is indeed preferable; there are pros and cons to either bringing these changes forward to the 16 th or sticking with 31 st December 2014 when P291 should be implemented. We do not object to 16 th .
National Grid	Yes	No further comment.

Question 4: Do you have any further comments on P295?

Summary

Yes	No
2	2

Responses

Respondent	Response	Rationale
IBM UK Ltd for and on behalf of the ScottishPower Group	No	-
EDF Energy	Yes	It is disappointing that potential alternatives which would have published on BMRS data relating to flows at the interconnector interface with other markets were not progressed. The possibility of using the same files as sent to the EU central platform, to report simultaneously on BMRS, should remain a possibility for the future.
E.ON	No	-
National Grid	Yes	There are some offline discussions undergoing as to who will be the formal data provider under the definition contained within the regulation but this will not have any impact on the solution or practicalities of P295.