

## P315 'Publication of Gross Supplier Market Share Data'

P315 proposes to provide further transparency on Suppliers' Meter Volume and MPAN counts. To help all Parties understand the gross Supplier market shares, the volumes will separately report embedded generation and be broken down by various characteristics within each Grid Supply Point Group. The aim is that increased transparency will give industry more equal access to basic market share information.

This Impact Assessment for P315 closes:

**5pm on 3 December 2014**

The Workgroup may not be able to consider late responses.

This Modification is expected to impact:

- Suppliers
- ELEXON

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase



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### Any questions?

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Contact:

**Oliver Xing**



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**Oliver.xing@elexon.co.uk**

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**020 7380 4276**

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## About This Document

This document is the Impact Assessment for [P315](#). It summarises the proposed P315 solutions requirements developed by the P315 Workgroup, and summarises the changes – to the extent the group has been able to identify them – that will be required to participants’ systems, BSC Central Systems, Code Subsidiary Documents and Configurable Items to implement each of the proposed solutions to P315.

We are issuing this document for impact assessment by BSC Agents (AM/Dev service provider and BPO/Host service provider), the Transmission Company, BSC Parties and Party Agents in order to establish the impacts, costs and lead times of P315 (including any impacts which are not identified in this document).

The P315 Workgroup will consider your responses at its next meeting. The pros and cons of P315 will be the subject of a subsequent industry consultation, but at this stage the Workgroup would appreciate your high level view of which P315 solution(s) you prefer.

Please provide your response using the attached response form (Attachment A).

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P315  
Impact Assessment

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Version 1.0

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# 1 Why Change?

The P315 Proposer contends that Suppliers' Metered Volume data that is currently published does not provide sufficient transparency for all BSC Parties to understand the retail market shares in the regional, i.e. within Grid Supply Point (GSP) Group, and national electricity supply market. The Proposer believes that, in order to help all Parties understand the gross Supplier market shares, Suppliers' Meter Volume needs to be published, and that the volumes to be published should be gross (i.e. exclude embedded generation) and be broken down by Market Participant Identifier (MPID), Profile Class (PC), Active Export/Active Import and Estimated/Actual within each GSP Group.

Publishing the data would be in the interests of competition, would aid the validation of Settlement data and would help National Grid balance the system.

## 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 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 license 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 gross supply volumes for each Supplier. However this data flow does not provide visibility of volumes broken down by PC. This limitation means that Parties are not be able to see the volumes consumed by different types (or PCs) of customers.

## What is the issue?

The Proposer believes that neither the SAA-I014 nor D0276 provide sufficient transparency to allow all BSC Parties to understand Suppliers' gross consumption for each PC within the regional or national supply market, nor is it presented in a user friendly format, and believes such transparency should exist in order to enable Parties 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 believes 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. P315 therefore contends that this indicates 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.

## Proposer's proposed solution

P315 proposes to publish Half Hourly gross Suppliers' Metered Volume and MPAN count (supply market share) by MPID, AE/AI, Actual/Estimate and PC within each GSP Group.

It is also proposed that ELEXON should make the monthly or quarterly summary data available for the benefit of smaller players via the ELEXON Portal, website or other delivery mechanisms as deemed appropriate by the Workgroup.

## 2 Proposed Solution Options

The Workgroup has developed three potential solution options to establish and publish Supplier market share data. The Proposer considers that Option A, at least, should form part of the Proposed Solution.

Note that the options are not mutually exclusive, i.e. any single option, combination of two options or all options together could form the P315 solution.

To assist the Workgroup in understanding and evaluating the different options, **please identify the impacts of each option separately** (but note any efficiency savings of implementing options together).

### Option A – User Friendly

ELEXON would publish each month market share data in both MWh (inclusive of Distribution Losses and after application of GSP Group Correction) and MPAN counts on the ELEXON website (as distinct from the ELEXON Portal). The MWh values would use data from the SF Run for each Settlement Day in the month. The MPAN count data would be as reported in the SF Run for the 15<sup>th</sup> of each reporting month. The data to be published would allow users to view the following information for each Trading Party Group in a user friendly format:

1. PC1 Metered Import
2. PC2 Metered Import
3. PC3 Metered Import
4. PC4 Metered Import
5. PC5 Metered Import
6. PC6 Metered Import
7. PC7 Metered Import
8. PC8 Metered Import
9. NHH Unmetered Import
10. HH Unmetered Import
11. HH Metered Import
12. Central Volume Allocation (CVA) Contract for Difference (CfD) Import<sup>1</sup>
13. NHH Export
14. HH Export
15. Total Import

The MPAN count data would include an additional column for DCC Active MPAN count and would exclude MSID count relating to CVA CfD Import.

Option A would contain data at the GB Market and GSP Group levels.

### Option A detailed requirements

Requirement 1	
The SVAA shall provide monthly Supplier market share data to ELEXON	
A1.1	The SVAA shall establish a process to provide specified monthly Supplier market share data to ELEXON. The data shall be aggregated for each Supplier by the characteristics described above (see Annex 1 for further technical detail).

<sup>1</sup> This refers to Suppliers' CVA import from the sites that are directly connected to the Transmission System and this data can be extracted from SAA-I0143 by BSCCo.

Requirement 2	
ELEXON shall extract CVA import data for Suppliers from SAA-I0143 and produce the Supplier market share summary data by combining this data with the SVAA data specified in A1.1.	
A2.1	ELEXON shall establish a process to extract CVA import data for Suppliers from SAA-I0143.
A2.2	ELEXON shall establish a process to summarise the monthly Supplier market share data in the required user friendly format and export the data onto a spreadsheet. This would allow Parties to filter the data to produce specified outputs.
Requirement 3	
ELEXON shall publish the summary data on the ELEXON website on a monthly basis	
A3.1	ELEXON shall establish a process to publish the monthly Supplier market share summary data on the ELEXON website (publicly accessible)

## Option B – Data Rich

ELEXON would provide information from the Data Transfer Catalogue (DTC) D0030<sup>2</sup>, D0081<sup>3</sup> and Electricity Market Reform (EMR) D0362<sup>4</sup> data flows for all Suppliers on the ELEXON Portal.

BSC Parties would have access to the data with no charge. Non BSC Parties would be able to license the data at a cost of £3,000, which is the same cost as to licence the data under [Modification P114 'Entitlement of Licence Exemptible Generators \(LEGs\) and other Non-trading Parties to BSC Membership Without Evidence of Trading' have free access to the data](#) (i.e. from P315 implementation licencing both the P114 data<sup>5</sup> and this P315 data would cost £3,000 in total).

### Option B detailed requirements

Requirement 1	
The SVAA shall provide DTC data flows for all Suppliers	
B1.1	The SVAA shall establish a process to provide monthly D0030, D0081 and D0362 data flows for all Suppliers to ELEXON on each Working Day.
Requirement 2	
ELEXON shall publish the data flows on the ELEXON Portal	
B2.1	ELEXON shall establish a process to publish the Supplier data flows on the ELEXON Portal on each Working Day.

<sup>2</sup> D0030: Non Half Hourly Distribution Use of System (DUoS) Report

<sup>3</sup> D0081: Supplier Half Hourly Demand Report

<sup>4</sup> D0362: Contract for Difference (CfD) Supplier Invoice Backing Data

<sup>5</sup> SAA-I0142, CDCA-I0422, CDCA-I0291 and CDCA-I01301, AKA "P114 data"

Requirement 3	
ELEXON shall ensure the data license process is in place	
B3.1	ELEXON shall ensure that all BSC Parties or those non BSC Parties that have already licensed data under modification P114 have free access to the data. Non BSC Parties that have not yet licensed P114 data shall be able to purchase P114 and P315 data together at a cost of £3,000 per annum (the cost of licensing P114 data)

## Option C – New Data flow

### Sub-option C1

Create a new DTC data flow containing the data relating to the 13 Aggregate Consumption Component Classes (as described in Annex 1) per Supplier ID. This data flow would be sent from the SVAA to each Supplier via the DTC (i.e. containing only the data for the Supplier ID).

### Sub-option C2

Produce the same content as the data flow under Sub-option C1, but with the data for all Supplier IDs. This data would be available from the ELEXON Portal. Non BSC Parties that have not yet licensed P114 data would be able to purchase P114 and P315 data together at a cost of £3,000 per annum (the cost of licensing P114 data).

### Option C detailed requirements

Requirement 1 (for both sub-option C1 and C2)	
The SVAA shall create a new DTC data flow	
C1.1	The SVAA shall create a new DTC data flow containing the data in Annex 1.
Requirement 2 (under sub-option C2 only)	
ELEXON shall publish the data flows on the ELEXON Portal	
C2.1	The SVAA shall provide the data in Annex 1 for each Supplier ID to ELEXON.
C2.2	ELEXON shall establish a process to publish the Supplier data flows on the ELEXON Portal on each Working Day.
Requirement 3 (under sub-option C2 only)	
ELEXON shall ensure the data license process is in place	
C3.1	ELEXON shall ensure that all BSC Parties or those non BSC Parties that have already licensed data under modification P114 have free access to the data. Non BSC Parties that have not yet licensed P114 data shall be able to purchase P114 and P315 data together at a cost of £3,000 per annum (the cost of licensing P114 data).

## Implementation Approach

P315 Workgroup will consider the impacts to BSC Central System and BSC Parties and lead times of implementing P315 arising from this Impact Assessment before making an informed decision on the implementation approach.

### What does this impact assessment seek?

This Impact Assessment seeks to assess the likely costs and lead times required to implement the three proposed solution options put forward by the Workgroup.

Please identify all direct impacts on your organisations required to implement each of the P315 solution options individually, and the costs and lead times that you would require to implement these changes. Please respond using the accompanying Impact Assessment response form in Attachment A.

Any information you provide can be treated as confidential if you wish, but all information will be shared with the Authority. Please state in your response whether you would also like the information to be kept confidential from the Workgroup and the Panel or whether you are happy for your response to be shared with them but not published on the ELEXON Website (if you do not explicitly state this, then we shall assume that your response is completely confidential, i.e. it will only be shared with the Authority).

Please note that any information kept confidential from the Workgroup and the Panel cannot therefore be taken into account by them when they consider the impacts, costs and lead times for P315 and whether it better facilitates the Applicable BSC Objectives. No confidential information will be shared with the wider industry.

The Workgroup also welcomes your initial views on which of the solution options, or which combination of solution options, described in Section 2 you prefer, and whether there are any other potential solutions that you believe the Workgroup should consider.

At this stage the Workgroup is not seeking views on the pros or cons of P315 or whether you believe it should be approved or rejected. These will be the subject of the Workgroup's subsequent Assessment Procedure Consultation once it has agreed which solution option or solution options to progress.

### Who is likely to be impacted by P315?

We anticipate that **the Supplier Volume Allocation Agent (SVAA)** will be impacted by all three solution options. We require that the SVAA impact assesses the three options including the sub options under Option C separately in terms of implementation costs and lead times.

We anticipate some indirect impacts to **BSC Trading Parties** that wish to make use of or analyse the Supplier market share data. However there should be no impact to those Parties who do not intend to use the data. We invite all BSC Trading Parties to impact assess the three options separately in terms of implementation costs and lead times.

**ELEXON** will be impacted by all the solution options (to a varying extent) which would require a regular process to be established to summarise and publish the relevant data and data flows.

## What else is likely to be impacted by P315?

P315 would impact **BSC Section V** to allow the publication of Supplier market share data in the Code.

Subsequent changes to **Code Subsidiary Documents (CSD)** are expected to be made accordingly. We would expect changes to be made to the following CSDs:

- Balancing & Settlement Code Procedure (BSCP) 508 - Supplier Volume Allocation Agent
- Service Description for the Supplier Volume Allocation Agent (SVAA)
- Supplier Volume Allocation Agent User Requirements Specification (SVAA URS)

P315 could potentially have consequential impact on **DTC** to introduce a new data flow to tailor the need to publish Supplier market share data.

## 4 Impacts Identified by the Workgroup

This section summarises the impacts that the Workgroup believes that P315 is expected to have on participants, documents and systems. Participants are invited to comment on these potential impacts and any other impacts the Workgroup has not foreseen.

### Impact on BSC Parties and Party Agents

Party/Party Agent	Impact
BSC Trading Parties	There is no direct impact to BSC Parties as a result of implementing P315. Parties may be indirectly impacted if they wish to further analyse or make use of the data provided (Option B & C).

### Impact on Transmission Company

We do not anticipate any mandatory impact on Transmission Company as a result of the implementation of P315. However, Transmission Company may wish to take advantage of the new data available to gain full visibility on embedded generation in distribution networks.

### Impact on BSCCo

Area of ELEXON	Impact
BSC Operations	BSC Operations will be required to extract Suppliers' CVA import data and to summarise the Supplier market share data in a user friendly format (Option A) and set up the publication process (Option A & B & C2).
Release Management	ELEXON will be required to implement this Modification.

### Impact on BSC Systems and process

BSC System/Process	Impact
SVAA	The SVAA will be required to provide Supplier market share data for all Suppliers (Option B) or create a new DTC data flow which tailors the need of this Modification (Option C). We also anticipate the SVAA needing to supply data for Option A. Indeed, costs for Option A should be provided in the scenarios that A is delivered alone and in conjunction with Option B or C as implementing Option B or C may change the costs of implementing Option A.

### Impact on Code

Code Section	Impact
Section V	Changes will be required to implement this Modification.

Impact on Code Subsidiary Documents	
CSD	Impact
BSCP508	Changes will be required to reflect the data publication.

Impact on other Configurable Items	
Configurable Item	Impact
Service Description for SVAA	Changes will be required to reflect changes to processes.
SVAA URS	

Impact on Core Industry Documents and other documents	
Document	Impact
Data Transfer Services Agreement	Changes will be required to reflect the new DTC data flow that P315 would introduce (Option 3).

## Appendix 1: Glossary & References

### Acronyms

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

Glossary of Defined Terms	
Acronym	Definition
AE	Active Export
AI	Active Import
BMU	Balancing Mechanism Unit
BSC	Balancing and Settlement Code
BSCCo	Balancing and Settlement Code Company
CfD	Contract for Difference
CSD	Code Subsidiary Document
CVA	Central Volume Allocation
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
MPAN	Metering Point Administration Number
MPID	Market Participant Identifier
NHH	Non Half Hourly
PC	Profile Class
SVA	Supplier Volume Allocation
SVAA	Supplier Volume Allocation Agent
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
D0030	Non Half Hourly Distribution Use of System (DUoS) Report
D0081	Supplier Half Hourly Demand 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
2	P315 page on the ELEXON website	<a href="http://www.elexon.co.uk/mod-proposal/p315/">http://www.elexon.co.uk/mod-proposal/p315/</a>
3	SAA-I0141 (Settlement Report sub flow 1) description	<a href="http://www.elexon.co.uk/wp-content/uploads/2014/07/neta_idd_part_1_v31.0.pdf">http://www.elexon.co.uk/wp-content/uploads/2014/07/neta_idd_part_1_v31.0.pdf</a>
3	SAA-I0142 (Settlement Report sub flow 2) description	<a href="http://www.elexon.co.uk/wp-content/uploads/2014/11/neta_idd_part_2_v31.0.pdf">http://www.elexon.co.uk/wp-content/uploads/2014/11/neta_idd_part_2_v31.0.pdf</a>
3	SAA-I0143 (Settlement Report sub flow 3) description	<a href="http://www.elexon.co.uk/wp-content/uploads/2014/11/neta_idd_part_2_v31.0.pdf">http://www.elexon.co.uk/wp-content/uploads/2014/11/neta_idd_part_2_v31.0.pdf</a>
3	DTC website	<a href="http://dtc.mrasco.com/Default.aspx">http://dtc.mrasco.com/Default.aspx</a>
3	Data flow descriptions on the DTC website	<a href="http://dtc.mrasco.com/ListDataFlows.aspx">http://dtc.mrasco.com/ListDataFlows.aspx</a>
6	P114 page on the ELEXON website	<a href="http://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/">http://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/</a>

## Annex 1

### SVAA A1.1

Create 13 new Aggregate Consumption Component Classes (ACCCs) for reporting purposes. Each of these ACCCs would be reported by Supplier Id, GSP Group Id and Run Type for each Settlement Date.

The MPAN counts would be reported by Settlement Day

The MWh values would be reported by HH Period with a Daily Total.

1. P1 – NHH Metered Import associated with Profile Class 1
2. P2 – NHH Metered Import associated with Profile Class 2
3. P3 – NHH Metered Import associated with Profile Class 3
4. P4 – NHH Metered Import associated with Profile Class 4
5. P5 – NHH Metered Import associated with Profile Class 5
6. P6 – NHH Metered Import associated with Profile Class 6
7. P7 – NHH Metered Import associated with Profile Class 7
8. P8 – NHH Metered Import associated with Profile Class 8
9. NU – NHH Unmetered Import
10. HU – HH Unmetered Import
11. HM – HH Metered Import
12. NE – NHH Export
13. HE – HH Export

Each ACCC has a Corrected MWh value and an associated Corrected Losses value. Both values would be reported in the new DTC data flow. The uncorrected values would not be reported.

#### MPAN counts

For 15<sup>th</sup> of each month derive the MPAN count for each BSC Party Id at GB and GSP Group levels for the 13 ACCCs.

#### SVA MWh totals

After the SF Run for the last day of each month has been produced, derive the total GSP Level (Corrected) MWh values per BSC Party Id at GB level for the 13 Reporting Categories (summed over each day in the month).

### ELEXON A2.1

#### CVA MWh totals

After the SF Run for the last day of each month has taken place, derive the total –ve QM value applicable to BM Units which are liable for Supplier CfD payments (summed over each day in the month) for each BSC Party Id for which the value is not equal to zero (and multiply it by -1 so that it is reported as a positive value).

## ELEXON A2.2

ELEXON procures MPAN count per Supplier Id for which the DCC Service Flag = "A" on (or as close to) 15<sup>th</sup> of each month.

ELEXON aggregates from Supplier Id to BSC Party Id as necessary and then from BSC Party Id to Trading Party Group Name.

ELEXON publishes compiled report of MPAN counts and MWh by Trading Party Group Name on the ELEXON website relating to each calendar month.