

CP Progression Paper

CP1503 'Changes to European Transparency Regulation data to align with latest ENTSO-e Manual of Procedures'

ELEXON



Committee

Imbalance Settlement
Group



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About This Document

This document provides information on new Change Proposal (CP) CP1503 and outlines our proposed progression timetable for this change, including when it will be issued for CP Consultation in the next suitable Change Proposal Circular (CPC) batch.

We are presenting this paper to capture any comments or questions from the Imbalance Settlement Group (ISG) Members on this CP before we issue it for consultation.

There are three parts to this document:

- This is the main document. It provides a summary of the solution, impacts, anticipated costs, and proposed implementation approach, as well as our proposed progression approach for this CP.
- Attachment A contains the CP1503 proposal form.
- Attachments B and C contains the proposed redlined changes to deliver the CP1503 solution.

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1 Why Change?

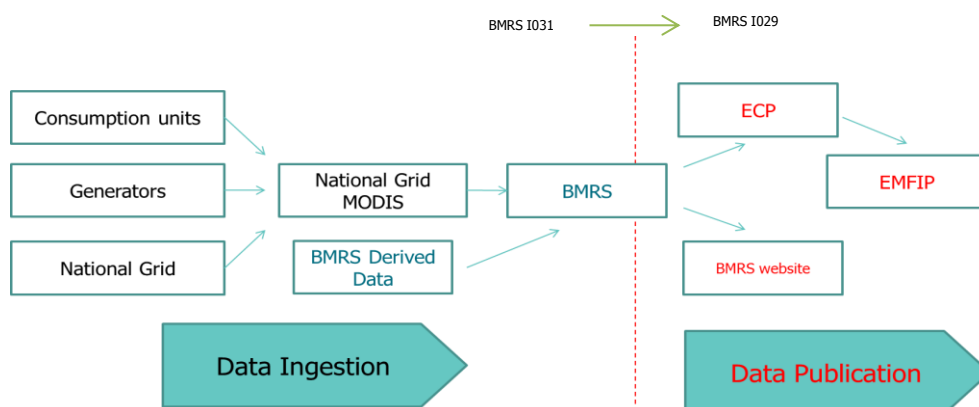


Manual of Procedures

The Manual of Procedures, as required in Article 5 of Regulation 543/2013, is a technical guide which has been developed by ENTSO-E and includes details about data definition, format as well as communications standards for data transfer between ENTSO-e and Data Providers.

Background

The European [Transparency Regulation No 543/2013](#) of 14 June 2013 (the 'Transparency Regulation') on submission and publication of data in electricity markets came into force on 5 July 2013. The Regulation mandates for a central information transparency platform to be operational 18 months after the Regulation came into force, and for participating Transmission System Operators (TSOs) – or their delegated representatives – to submit [European Transparency Regulation](#) (ETR) Data from the operational date, or as soon as possible thereafter.



ENTSO-e established the [Electricity Market Fundamental Information Platform \(EMFIP\)](#) on 5 January 2015 and publishes ETR data from TSOs across the EU.

Balancing and Settlement Code (BSC) Modification [P295 'Submission and publication of Transparency regulation data via the BMRS'](#) was approved by the Authority on 22 January 2014 and implemented on 16 December 2014; since 5 January 2015 GB market participants and National Grid have been submitting ETR data to EMFIP via the Balancing Mechanism Reporting Service (BMRS).

The data is submitted in accordance with the Transparency Regulation and aligned to the [ENTSO-e's Manual of Procedures \(MoP\)](#). The data items are specified in [BSC Section V 'Reporting'](#) Table 1B and BMRA User Requirement Specification (URS) Appendix C paragraph 7. The [NETA Interface Definition & Design \(IDD\) Part 1 and 2](#) specifies the flows (BMRA-I029), (BMRA-I031) and XML format of the data, so it is consistent with the [ENTSO-e's XML Schema Definition \(XSD\)](#) which will need amending for this CP.

What is the issue?

ENTSO-e has already announced changes to the MoP and members are expected to comply 01 December 2018 that impact the transparency data required from GB market participants and National Grid and that require changes to the BMRS to receive and publish this data before forwarding it to the EMFIP platform.

The IDD Part 2 refers to the ETR data as BMRA-I029 relates to subject of the ETR data send by National Grid to BMRS. The XSD defines the format values for the flows, and further outlines the business rules to deliver the flows which is defined in the MoP however the overall rules are defined in the MoP and also specifies the related XSD; however the

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rules on implementing the flows are defined in the MoP and its reference documents, which are not currently recognised in the IDD.

Furthermore, currently the BMRA-I031 in IDD Part 1 does not refer to either the XSDs or the MoP. Therefore the IDD Part 1 also needs to be amended to recognise that ETR data published from BMRS conforms with the ENTSO-e's XSD and MoP.

Proposed solution

ELEXON must implement changes to the BMRS to ensure ongoing compliance with the changes ETR as set out in MoP v2.1:

- to receive, process and publish the amended transparency data from National Grid; and
- to calculate and publish amended transparency data;

BMRS will continue to forward all transparency data to the EMFIP.

In addition to the changes ensuring ELEXON is compliant with the ETR, this CP proposes to improve reporting of ETR outage reports on BMRS, A03 Curve types for Article 17.1 (b) and Article 17.1 (c) and to allow of additional business types for the timeseries for Article 13.1 (c).

National Grid has requested an implementation date for this change that is significantly earlier than the November 2018 release date - April 2018, or as soon as possible thereafter. This date will ensure ELEXON fulfils the obligation under the ETR. ENTSO-e has allowed those affected by the change in MoP until 01 December 2018 to make these system changes.

The MoP should be referenced in the BMRA-I031 data flow in the NETA IDD Part 1 and BMRA-I029 data flow in the NETA IDD Part 2 as part of this Change Proposal. (The specific changes that are giving rise to BMRA-I029 and BMRA-I031 will be specified in the lower level reference subsidiary [documentation](#) rather than the MoP itself). This will ensure the changes are controlled under BSC Governance to ensure BSC Parties have visibility of the changes to BMRS, by making reference to the MoP in the IDD this will ensure futures changes to the MoP are given visibility through the CP process. ELEXON must comply with BSC and ETR, maintaining full compliance.

National Grid have requested to be able to start sending Article 17.1 b and 17.1 c in the A03 Curve Type which will require a change to BMRS to present the data correctly. National Grid has asked for this change to be implemented in April 2018 or as soon as possible thereafter.

ENTSO-e have allowed a transition period until 31 December 2018 for Data Providers to conform to changes in the MoP. The changes for ETR data within scope of BMRS are summarised below.

The ETR Articles impacted by the MoP changes:

- 14.1 (b) "Installed Generation Capacity Per Unit" - Publication of commissioning and decommissioning dates
- 14.1 (d) "Day-Ahead Generation Forecasts For Wind And Solar" - Additional forecasts intraday and "current/most recent"
- 17.1 (d) "Accepted Aggregated Offers" – Offered capacity removed
- 17.1 (e) "Activated Balancing Energy" - Unit of measurement MWh only
- 17.1 (f) "Prices of activated energy" - Prices maybe positive or negative

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- 17.1 (h) “Aggregated Imbalance Volumes” - Surplus/deficit indicated explicitly and use additional tags to indicate surplus or deficit

The changes for ETR data within scope of National Grid and BMRS are summarised in Appendix 2. Full list can be found in Appendix 2 of this document.

Proposer’s rationale

The latest changes to the MoP require National Grid to amend some of the dataflows that it sends to the BMRS. To fulfil the obligation under the Transparency Regulation, i.e. to report data to EMFIP, the BMRS must conform to the latest effective MoP.

Proposed redlining

Attachment B and C contains the proposed changes to deliver CP1503. Both the NETA IDD Part 1 and 2 are impacted by this CP.

3 Impacts and Costs

Central impacts and costs

Central impacts

ELEXON, via its service provider, will need to upgrade software to update the BMRS systems.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">• NETA IDD Part 1 (document only)• NETA IDD Part 2 (document only)	<ul style="list-style-type: none">• BMRS Mandatory changes in the MoP: Article 14.1 (a), 14.1 (d), 17.1 (d), 17.1 (e), 17.1 (f) & 17.1 (h) Improvement to existing reporting: 15.1 (a), 15.1 (b), 15.1 (c) & 15.1 (d) Improvement on National Grid reporting: Enabling A03 Curve types for Article 17.1 (b) and Article 17.1 (c) and allowing processing of additional business types for the timeseries for Article 13.1 (c).

Central costs

The implementation costs for CP1503 has been estimated to be approximately £230,346. This is the sum of service provider costs and ELEXON operational costs.

BSC Party & Party Agent impacts and costs

ELEXON will clarify BSC Party and Party Agent potential impact and costs through CP Consultation.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
There are no direct impact identified for BSC Parties; however Market Participants consuming the data from BMRS will need to be aware of the changes to the data reported.	

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4 Implementation Approach

Recommended Implementation Date

ELEXON has proposed that the solution to CP1503 be delivered on **01 November 2018** as part of the November 2018 BSC Release. This is the next available Release that can include this CP.

The rationale for this is to fulfil the obligation under the Transparency Regulation. ENTSO-e has allowed those affected by the change in MoP until **01 December 2018** to make these system changes.

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5 Proposed Progression

Progression timetable

The table below outlines the proposed progression plan for CP1503:

Progression Timetable	
Event	Date
CP Progression Paper presented to ISG for information	20 February 2018
CP Consultation	05 March 2018 – 29 March 2018 (Easter weekend)
CP Assessment Report presented to ISG for decision	17 April 2018
Proposed Implementation Date	01 November 2018 (November 2018 Release)

CP Consultation questions

We intend to ask the standard CP Consultation questions for CP1503. We do not believe any additional questions need to be asked for this CP.

Standard CP Consultation Questions
Do you agree with the CP1503 proposed solution?
Do you agree that the draft redlining delivers the CP1503 proposed solution?
Will CP1503 impact your organisation?
Will your organisation incur any costs in implementing CP1503?
Do you agree with the proposed implementation approach for CP1503?

6 Recommendations

We invite you to:

- **NOTE** that CP1503 has been raised;
- **NOTE** the proposed progression timetable for CP1503; and
- **PROVIDE** any comments or additional questions for inclusion in the CP Consultation.

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Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BMRS	Balancing Mechanism Reporting Service
BSC	Balance and Settlement Code
CP	Change Proposal
CPC	Change Proposal Circular
EMFIP	Electricity Market Fundamental Information Platform
ENTSO-e	European Network of Transmission System Operators
ETR	European Transparency Regulation
EU	European Union
IDD	NETA Interface Definition & Design Part 2
ISG	Imbalance Settlement Group
MOP	Manual of Practice
TSO	Transmission System Operator
XSD	XML Schema Definition

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	ENTOS-e's webpage	https://www.entsoe.eu/Pages/default.aspx
2	The European Transparency Regulation No 543/2013 webpage	http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF
2	Electricity Market Fundamental Information Platform webpage	http://osp.energinet.dk/SiteCollectionDocuments/Danske%20dokumenter/EI/8.%20Intro%20til%20implementering%20af%20transparensforordning.pdf
2	European Transparency Regulation page of ENTSO-e's website	https://www.entsoe.eu/data/entso-e-transparency-platform/Pages/default.aspx
2	P295 page of ELEXON's website	https://www.elexon.co.uk/mod-proposal/p295/

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External Links		
Page(s)	Description	URL
2	ENTSO-e's Manual of Procedures	https://www.entsoe.eu/data/entso-e-transparency-platform/Manual-of-Procedures/Pages/default.aspx
2	BSC Section V 'Reporting' page of ELEXON's website	https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/
2	The NETA Interface Definition & Design Part 2 page of the ELEXON's website	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/interface-definition-documents/
2	The ENTSO-e's XML Schema Definition (XSD) page of ENTSO-e's website	https://www.entsoe.eu/data/entso-e-transparency-platform/Data-Providers/Pages/default.aspx
3	The Technical Documentation page of ENTSO-e's website	https://www.entsoe.eu/data/entso-e-transparency-platform/Manual-of-Procedures/Pages/default.aspx

Appendix 2: Summary of changes to ETR data

ETR Article	Data summary	Revision	Primary Data Owner	Impact	Notes
12.1(b) &(f)	Information relating to the use of cross zonal capacities	Separate publications per time horizon, no aggregation on TP	Interconnector	No impact	BMRS does not receive or publish interconnector ETR data
13.1(a)	Information relating to congestion management measures	Publication of energy instead of capacity, distinction internal/cross-border re-dispatching, network element optional	Interconnector	No Impact	As above
14.1(b)	Installed Generation Capacity Per Unit	Publication of commissioning and decommissioning dates	National Grid	Impact to ELEXON and National Grid	Report is derived from the Master configuration data and the BMRS website GUI needs to be modified to include decommissioning date when confirmed
14.1(d)	Forecast Generation - Day-Ahead Generation Forecasts For Wind And Solar	Additional forecasts intraday and "current/most recent"	National Grid	Impact to ELEXON and National Grid	National Grid will need to amend their system to send additional data and changes are required to BMRS GUI (APIs) to include a most recent forecast. Defined as process type, therefore an attribute in the header of the XML. Separate XML need to be submitted for intraday and current. Frequency of submissions for current forecast has not been defined
17.1 (d)	Accepted Aggregated Offers	Offered capacity removed	ELEXON (BMRS)	Low impact	The offered capacity is currently displayed on the BMRS website and has been blank. No changes will result in an empty column (as-is)
17.1 (e)	Activated Balancing Energy	Unit of measurement MWh only	National Grid	Low impact	National Grid will need to convert the value submitted to BMRS to MWh. The column headers on BMRS website needs to be amended to from MWh

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ETR Article	Data summary	Revision	Primary Data Owner	Impact	Notes
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13.1(a)	Information relating to congestion management measures	Publication of energy instead of capacity, distinction internal/cross-border re-dispatching, network element optional	Interconnector	No Impact	As above
17.1 (f)	Prices of activated energy	Prices may be positive or negative	National Grid	Low Impact	XSD validation on BMRS does not currently restrict signed values and this has little or no impact.
17.1 (h)	Aggregated Imbalance Volumes	Surplus/deficit indicated explicitly and use additional tags to indicate surplus or deficit	ELEXON (BMRS)	Impact on ELEXON	ELEXON currently generates the data and will require changes to the data and the website presentation
Enabling Curve Type functionality on EMFIP					
7.1 (a) &(b) & 15.1 (a), (b), (c) & (d)	Outage Data 7.1 (a) & 7.1 (b) – consumption unit 15.1 (a) & (b) – Generation units 15.1 (c) & (d) – Production units	Validation against overlapping outages & curves types now permitted	Generators Consumption units	No impact	Data owners are now able to submit outage curve (profiles). There is an opportunity to align BMRS website presentation with ENTSO-e to make the screen more useable. The overlapping validation can be configured by ELEXON to either issue a warning or reject overlapping outages.