P398 — Increasing access to open data

Workgroup meeting two

30 March 2020

ELEXON

Skype meeting ground rules

- No video please - bandwidth

- All on mute – use IM if you can't break through

- Talk – pause – talk

- Most of us are at home – be mindful of background noise and connection speeds

- *Bear with us – this is still relatively new*

ELEXON

Welcome and objectives

- Finalise the solution

- Agree Business Requirements

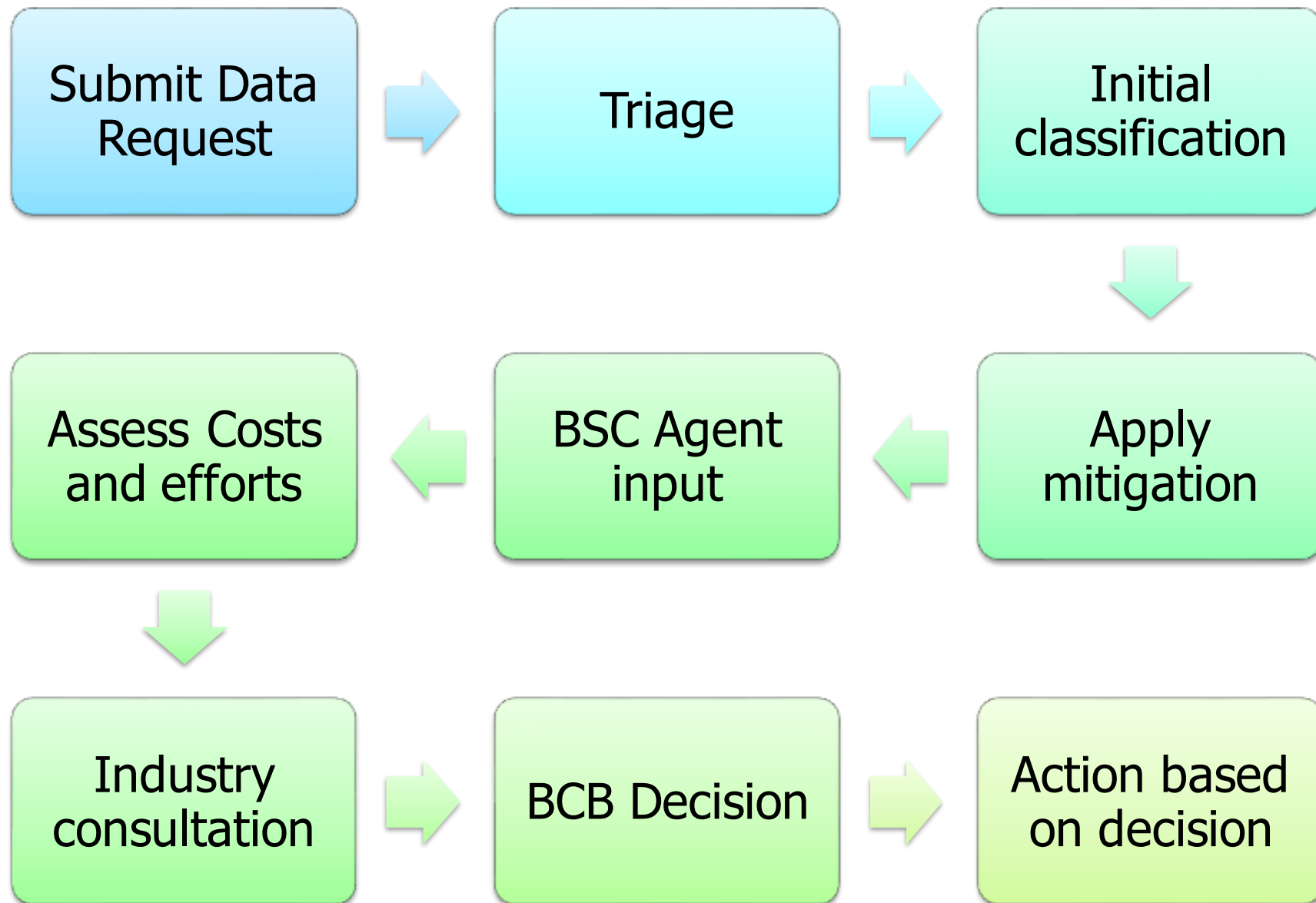- Discuss legal questions

- Agree consultation questions

Agenda

Agenda item	Lead
1. Welcome and Objectives	Chair
2. Reminder of solution as agreed previously	Chris Wood
3. WG1 Actions and work since last Workgroup	Chris Wood
4. Review of Business Requirements	Chris Wood
5. Review of process diagrams	Assad Ijaz
6. Legal text progression	Nick Brown
7. Identification and prevention of gaming	Jeremy Caplin
8. Break	Chair
9. Interim IT Solution update	Emma Tribe
10. Consultation contents and questions	Chris Wood
11. Next steps	Chris Wood
12. AOB	Chair
13. Close	Chair

ELEXON

Reminder of solution

Chris Wood

P398 proposed solution

Submit Data Request → Triage → Initial classification

Initial classification → Apply mitigation → BSC Agent input → Assess Costs and efforts

Assess Costs and efforts → Industry consultation → BCB Decision → Action based on decision

ELEXON

P398 solution

- Templates will be provided

- Instructions for completing forms to be published

- Processes will be published

- Everything should be easily discoverable

- Applications to be published (subject to triage and classification)

- Appeals process, but Panel's decision will be final

- Statistics to be published and/or shared

- BMRS Change Board Terms of Reference to align with other sub-committees as close as possible
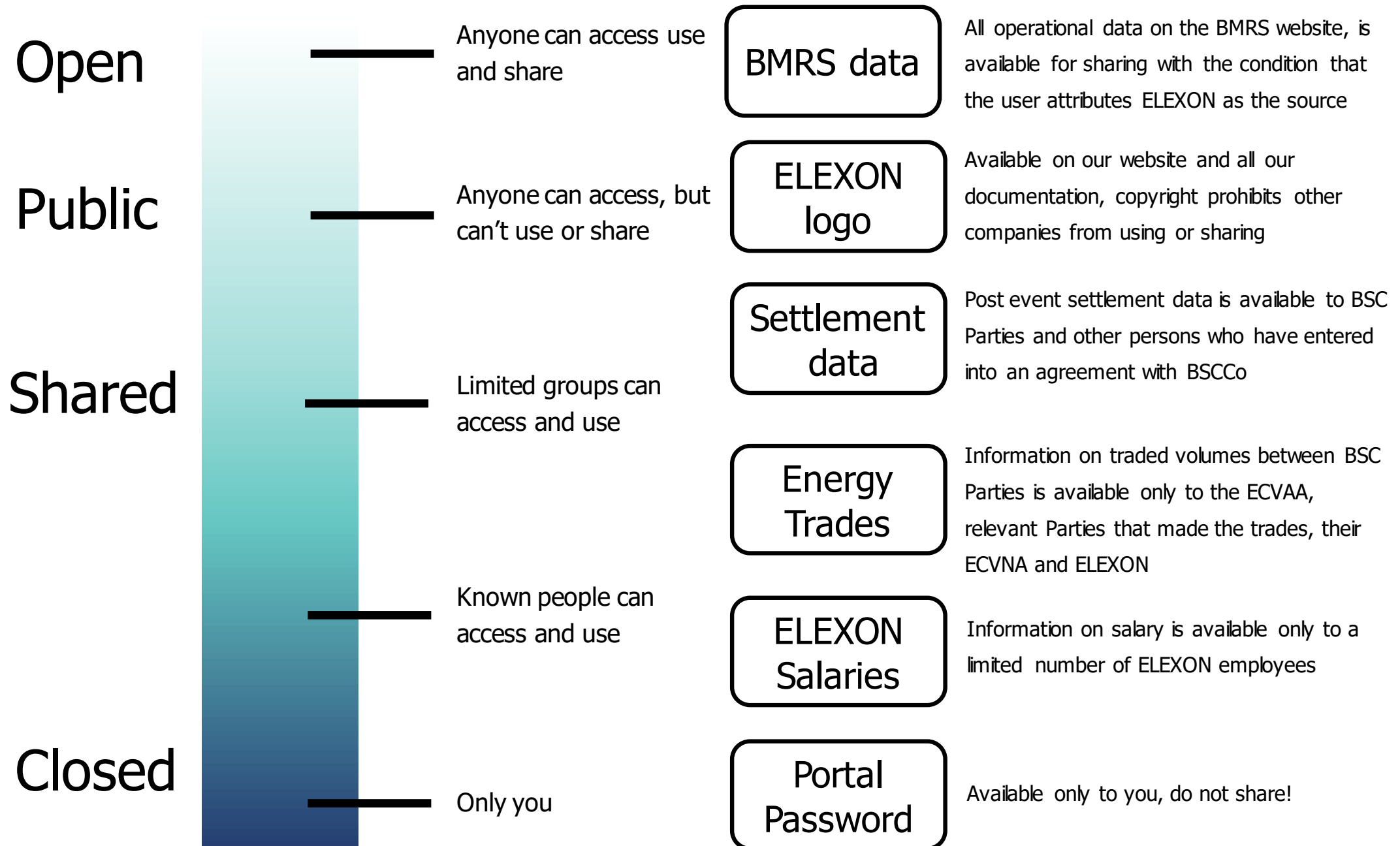
- Standing delegations

ELEXON

Triaging data

All data should be triaged against each of these categories i.e. a simple yes/no:

- Consumer privacy – are there consumer Privacy issues either directly or indirectly?
  - Can the data be used to identify a private person? e.g. address
  - Can the data be used alongside other data to identify an individual? e.g. MSID (MPAN)
- Consumer Impact – will releasing the data have a negative impact on consumers?
  - What does negative impact mean?
  - To what extent will there be a negative impact?
- Security – will releasing the data have security implications?
- Commercial – are there commercial implications for releasing the data?
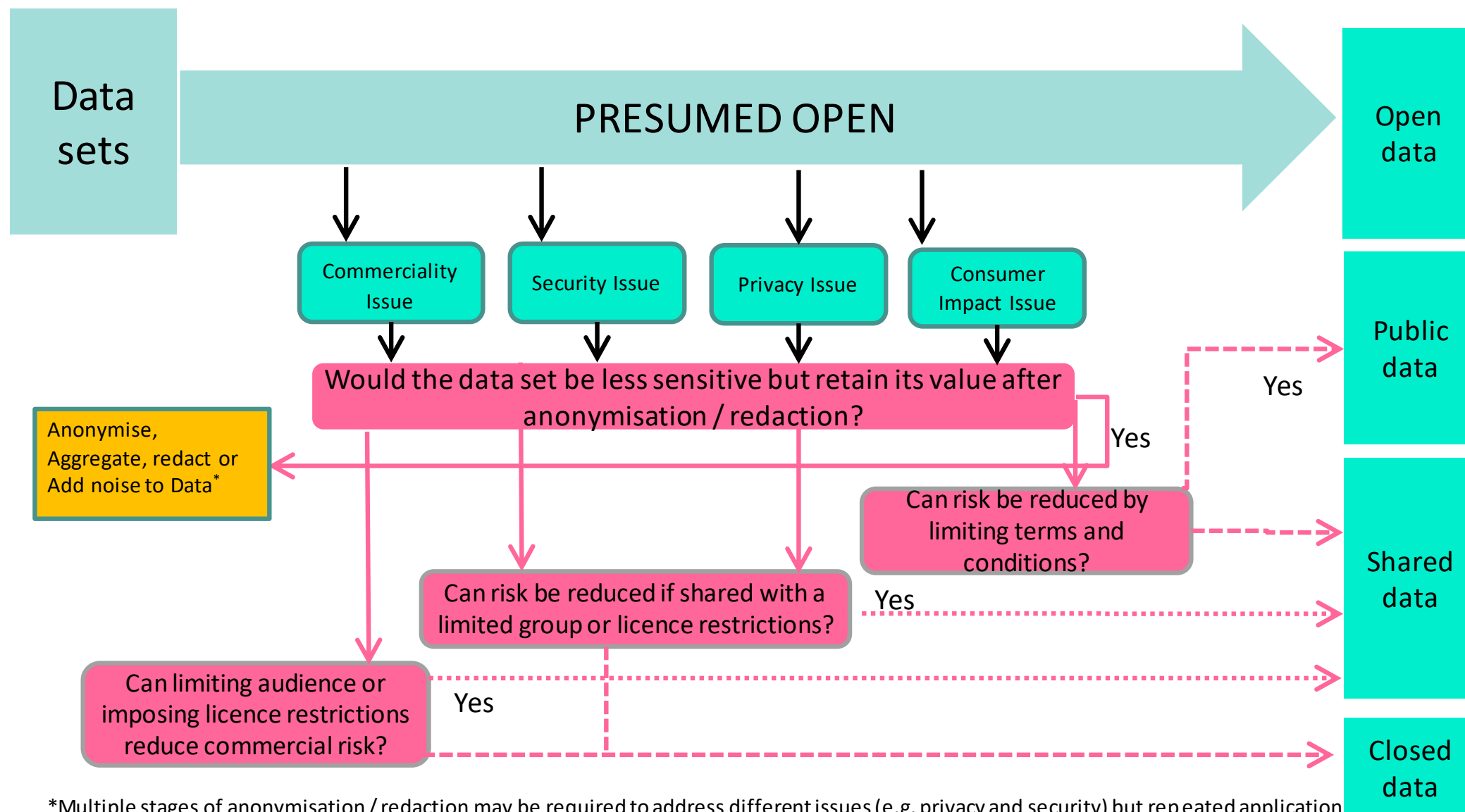- Governance – does the law/BSC allow for sharing of the dataset?

ELEXON

Scale of how open the access to data is

Open	Anyone can access use and share	**BMRS data** — All operational data on the BMRS website, is available for sharing with the condition that the user attributes ELEXON as the source
Public	Anyone can access, but can't use or share	**ELEXON logo** — Available on our website and all our documentation, copyright prohibits other companies from using or sharing
Shared	Limited groups can access and use	**Settlement data** — Post event settlement data is available to BSC Parties and other persons who have entered into an agreement with BSCCo
		Energy Trades — Information on traded volumes between BSC Parties is available only to the ECVAA, relevant Parties that made the trades, their ECVNA and ELEXON
	Known people can access and use	**ELEXON Salaries** — Information on salary is available only to a limited number of ELEXON employees
Closed	Only you	**Portal Password** — Available only to you, do not share!

Possible mitigation techniques (not conclusive)

Redaction	• Removal of sensitive data
Anonymisation	• Removal of personal data
Aggregation	• Combine data sets so the collective sum is less sensitive
Limitation	• Only share with specific individuals or group(s)
Noise	• Combine original data with meaningless data to confuse
Delay	• Wait until data is less sensitive before sharing
Differential Privacy	• Obscuring the data in such a way as to mask original identities
Shift/rotate	• Altering the position or orientation of spatial or time series data
Randomisation	• Making random changes to data
Normalisation	• Modifying data to reduce the difference between individual subjects

Classification of data

Data sets

PRESUMED OPEN →

Open data

| Commerciality Issue | Security Issue | Privacy Issue | Consumer Impact Issue |

Would the data set be less sensitive but retain its value after anonymisation / redaction?

Anonymise, Aggregate, redact or Add noise to Data*

Can risk be reduced by limiting terms and conditions? — Yes

Public data

Yes

Can risk be reduced if shared with a limited group or licence restrictions? — Yes

Shared data

Can limiting audience or imposing licence restrictions reduce commercial risk? — Yes

Closed data

*Multiple stages of anonymisation / redaction may be required to address different issues (e.g. privacy and security) but repeated application should be limited

ELEXON

Actions since last meeting

Chris Wood

ELEXON

What we've done since we last met

- Business Requirements

- Process design

- Drafting of legal text

- Attended Energy Data Best practice workshop

- Ensured that all input from Workgroup ahs been built into the solution and/or implementation plan

ELEXON

Meeting group one actions (1 of 2)

■ Avoid duplicating data available elsewhere – BRs have requirement to consider other industry data as part of our internal processes

■ Data labelling to be considered i.e. which bit of BSC requires it's creation – we will add this to our internal processes

■ Consider ACER's REMIT guidance – we have reviewed and are happy that we are proposing best practice

■ There should be a central body for coordinating data – Ofgem are working on this and it is outside of P398

■ Codify Cost-Benefit-Analysis – this is in the BRs and will be codified

■ ELEXON to engage BSC Agents – we are liaising with colleagues that manage contracts about best way ahead

■ Make decision making process public to allow synergy between BSCCo, BCB and requester – see Business requirements

■ Consultation process to be by negative response – this will be built into the template

ELEXON

Meeting group one actions (2 of 2)

- ELEXON to draft consultation template – see Business requirements

- When assessing risk, need to consider opening up markets and innovation etc. against the competition implications for looking at identified patterns – see Business requirements

- Number of appeals to be limited to one – the Panel will arbitrate definitively

- ELEXON to develop draft request form and process to triage the request form – see Business Requirements

- The BCB will have the ability to direct the BSCCo – included in Business Requirements

- ELEXON to report data request statistics to Ofgem – included in Business Requirements

- ELEXON to confirm how to treat third party data – completed

- ELEXON to produce examples of mitigation e.g. noise – will include in consultation

- Discuss methods of sharing data with InfoSec – ongoing

ELEXON

Business Requirements

Chris Wood

Business requirements over view

- 1   Ability for parties to request data

- 2   Identify teams / individual to triage data request

- 3   BSCCo to consider mitigation methods

- 4   BSCCo to classify data

- 5   BSCCo to assess time and effort required for data request

- 6   BSCCo to make recommendation to BCB.

- 7   BSCCo to consult industry on recommendation

- 8   BSCCo to present recommendation to BCB

- 9   BCB to make decision on data request

- 10   BSCCo Standing Delegation

- 11   BCB to notify requesting party of decision

- 11   BCB to notify requesting party of decision

- 12   Terms of Reference for BCB

- 13   BSCCo shall publish approved data sets in electronic format

- 14   Requesting party shall have ability to appeal a decision

- 15   BSCCo to submit report to Ofgem

ELEXON

Business Requirement	Description	Process or form required?	Action	Required by Decision or Implementation?
1	Ability for parties to request data	No	Amend BSC to reflect	Decision
1.1	BSCCo to provide data request form	Yes	Create data request form - include overview/template/ high-level in Consultation	Implementation
1.2	BSCCo to conduct critical friend analysis	No	Add to BSC/BSCP	Decision
1.3	Data request form to be easily accessible	No	Identify location on website	Implementation
1.4	Instructions for data request form	Yes	Create instructions alongside creating form	Implementation
1.5	Data request form shall highlight mandatory and optional areas	Yes	Make clear on form	Implementation
1.6	BSCCo shall have a single point of contact for receiving requests	No	Determine which team will run the Data process	Decision
1.7	Establish process for acknowledging request	Yes	Create Process	Decision
2	Identify teams / individual to triage data request	Yes	Process for assigning triage	Decision
2.1	BSCCo to publish document detailing triage process	Yes	Draft process document	Implementation
2.2	BSCCo to establish processes for updating open data documents	Yes	Include with 2.1 process document	Decision
2.3	BSCCo to establish Local Working Instructions (LWI) for processing data requests	Yes	Write LWIs	Implementation
3	BSCCo to consider mitigation methods	No	Add to BSC/BSCP	Decision
3.1	BSCCo to publish document detailing mitigation methods.	Yes	Include in BR2.1	Implementation
4	BSCCo to classify data	No	Add to BSC/BSCP	Decision
4.1	BSCCo to publish document detailing data classification.	No	Include in BR2.1	Implementation
5	BSCCo to assess time and effort required for data request	No	Add to LWI in BR2.3	Decision
5.1	BSCCo to request input from BSC Agents	Yes	Process for requesting BSC Agent Data	Decision
5.1	BSCCo to request input from BSC Agents	No	CRs to SPs for SPIA	Decision
5.2	BSCCo to assess costs	Yes	Process for assesing costs	Decision
5.3	BSCCo to assess effort	Yes	Process for assesing effort	Decision
5.4	BSCCo to consider the benefits of data request	Yes	Add to LWI in BR2.3	Implementation
5.5	BSCCo to consider the impacts to wider industry.	Yes	Add to LWI in BR2.3	Implementation
6	BSCCo to make recommendation to BCB.	No	Add to BSC/BSCP	Decision
7	BSCCo to consult industry on recommendation	No	Add to BSC/BSCP	Decision
7.1	Template for consultation	Yes	Create Consultation template	Implementation
7.2	Template for responses	Yes	Create Consultation template	Implementation
7.3	Instructions for response form	Yes	Include in templates	Implementation

ELEXON

Business Requirement	Description	Process or form required?	Action	Required by Decision or Implementation?
8	BSCCo to present recommendation to BCB	No	Add to BSC/BSCP	Decision
8.1	Template for presenting recommendation	Yes	Create template	Implementation
9	BCB to make decision on data request	No	Add to BSC/BSCP	Decision
10	BSCCo Standing Delegation	No	Add to BSC/BSCP	Decision
10.1	Standing Delegation Process	Yes	Add to BSC/BSCP	Decision
10.2	List of Delegations to be Public	Yes	Create process for Publishing delegation, inc. location	Decision
10.3	List of Delegations to be reviewed	No	Add review Periodicity to BSC/BSCP	Implementation
11	BCB to notify requesting party of decision	No	Add to BSC/BSCP	Decision
11	BCB to notify requesting party of decision	No	Identify how mail list will be formed	Implementation
12	Terms of Reference for BCB	No	Add of BSC/BSCP	Decision
12.1	BSCCo to Publish BCB TOR	No	Consider if better to be encoded or stand-alone. If Stand-alone - where?	Decision
13	BSCCo shall publish approved data sets in electronic format	No	Add to BSC/BSCP	Decision
13.1	Published data sets must be discoverable	Yes	Process for Publishing and identify location for publishing - tie in with 10.2, 12.1, and 13.0	Implementation
13.2	Published data sets must be descriptive	No	Identify what needs to be in descriptions - create template	Implementation
13.3	BSCCo shall publish all data requests and outcomes	Yes	Tie in with 10.2, 12.1, 13.0 and 13.1	Implementation
13.4	BSCCo shall publish circular and notice	Yes	Design circular template/identify existing circular to use - if latter, consider standard format	Implementation
13.5	Details of requests can remain anonymous	Yes	Tie-in with BR1 - ensure BR1.1 outcomes make clear that anonymity is available	Implementation
14	Requesting party shall have ability to appeal a decision	No	Add to BSC/BSCP	Decision
14.1	Appeals process	Yes	Create process	Decision
14.2	BSCCo to provide appeal form	Yes	Design form	Implementation
14.3	BSCCo to publish document detailing appeals process	No	Create guidance/Instruction form	Implementation
14.4	Panel to review appeal and make decision	No	Add to BSC/BSCP	Decision
14.5	Panel to notify appealing party of outcome	No	Add to BSC/BSCP	Decision
15	BSCCo to submit report to Ofgem	No	Discuss content and periodicity with Ofgem	Implementation

ELEXON

Processes

Assad Ijaz

ELEXON

P398 processes

- See Visio process documents

ELEXON

Legal text progression

Nick Brown

P398 – Impacts to Existing Code Sections

- Data that the BSC explicitly identifies as being confidential:

  - See overleaf for list

  - Key decision for P398 Workgroup is whether BSC Trading Data should be subject to open data process i.e. confidential reports under Section V

- Should existing processes for publishing BSC data be aligned with P398 e.g. Panel powers under B3.3

- Existing IPR provisions in Section H allow BSC data to be used only for the purposes contemplated by the Code. Should this be relaxed to allow Parties and non-parties to use for wider purposes?

ELEXON

BSC Provisions that establish confidential information

- Annex C-1 – information that relates to non-BSC activities that may be undertaken by BSCCo

- Section E – confidential information in BSC Agent and BSC Service Manager contracts

- Section F – confidential representations made in response to mod. Consultations

- Section H – certain information contained in reports provided by sandbox participants

- Section N - Ledger accounts maintained by the FAA

- Section T - data relating to a Party used in connection with Market Index Data

- Section V – Trading Data

- Section W – items identified as confidential in TDC terms of reference

- Section Z – PAB minutes, papers, certain information held by PAA

ELEXON

Gaming

Jeremy Caplin

Identification and Prevention of Gaming - Principles

- Open Data should not give one Party commercial advantages over another

    - Parties should be free to gain commercial advantage from how they use the data, but not have privileged access to data

- Need to try to ensure data can not be combined with other Open Data sets to breach commercial confidentiality

ELEXON

Identification and Prevention of Gaming - Roles

- It is not within BSCCo's remit to monitor the market

  - Ofgem Monitor and Regulate

- Any Party that believes any Open Data is leading to Gaming should report their concerns to Ofgem

- BSCCo would report concerns to Ofgem, but does not have the resource to police the use of data

ELEXON

Identification and Prevention of Gaming - Questions

- What can we do to identify and prevent gaming?

- Should there be a process to flag concerns to BSCCo?

  - Should there be a process to suspend publication of data if gaming is suspected?
  - How would such a process work?
  - How much analysis should BSCCo do?
  - How much analysis by BSCCo are Parties prepared to pay for?

- What are the Work Group's views on Gaming?

  - Is it a concern?
  - What should be done about it?

ELEXON

Interim IT solution update

Emma Tribe

Consultation questions

Chris Wood

Standard questions:

■ Do you agree with the Workgroup's initial view that P398 does better facilitate the Applicable BSC Objectives than the current base line?

■ Do you agree with the Workgroup that the draft legal text in Attachment X delivers the intention of P398?

■ Do you agree with the workgroups view of impacts and costs?

■ Will the implementation of P398 impact your organistation?

■ Will your organisation incur any costs in implementing P398?

■ Do you agree with the Workgroup's recommended Implementation Date?

■ How long (from the point of Authority approval) would you need to implement P398?

■ Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P398 which would better facilitate the Applicable BSC Objectives?

ELEXON

Assessment Procedure Consultation (2 of 2)

Additional suggested questions:

- What will be the benefits for your organisation?

  − Can you provide indicative costs of the benefits?

- How likely and/or often are you to make data requests?

- Is there anything further we can do to mitigate data security risks?

- Over to you…

ELEXON

Next steps

Chris Wood

P398 Next steps

- Finalise solutions, processes and business requirements

- Finalise legal text

- Draft consultation

- Share final versions of above

- Carry out impact assessments, including EGBL requirements

- Quick meeting to gather views

- Consultation

- Workgroup meeting to review consultation responses

- Assessment Report

- Report phase consultation

- Draft Modification Report

- Submit to Ofgem

ELEXON

AOB

Chris Wood

ELEXON