

Grid Code Modification Proposal Form

GC0174:**Removal of obligation to provide EU Transparency Availability Data**

Overview: Following the approval of BSC Modification [CP1583](#) (Rationalising publication of European Transparency Regulation data on Elexon Systems), the obligation for parties to submit EU Transparency Availability Data as specified in OC2.4.7 is no longer required.

Modification process & timetable

Status summary: The Proposer has raised a modification and is seeking a decision from the Panel on the governance route to be taken.

This modification is expected to have a: Low impact

Generators, Non-Embedded Customers, Electricity System Operator

Modification drivers: Cross-code change, Efficiency, Harmonisation

Proposer's recommendation of governance route

Self-Governance modification to proceed to Code Administrator Consultation

Who can I talk to about the change?**Proposer:**

David Halford

David.halford@nationalgrideso.com

07812 774065

Code Administrator Contact:

Lizzie Timmins

Elizabeth.timmins@nationalgrideso.com

Contents	2
What is the issue?	3
Why change?	3
What is the proposer’s solution?	3
Legal text.....	3
What is the impact of this change?	4
Proposer’s assessment against Grid Code Objectives	4
Proposer’s assessment of the impact of the modification on the stakeholder / consumer benefit categories.....	4
When will this change take place?	5
Implementation date	5
Date decision required by	5
Implementation approach	5
Proposer’s justification for governance route	5
Interactions	6
Acronyms, key terms and reference material	6
Reference material	6
Annexes	6

What is the issue?

[CP1583](#) (Rationalising publication of European Transparency Regulation (ETR) data on Elexon Systems), is a Balancing and Settlement Code (BSC) modification. It was raised by Elexon to review the ETR data provided by Market Participants and the ESO which pre-January 2021 was submitted to the European Network of Transmission Operators for Electricity (ENTSO-E) data platform, known as the Electricity Market Fundamental Information Platform (EMFIP), via the Balancing Mechanism Reporting Service (BMRS).

Due to the UK leaving the European Union (EU), there is no longer a legal requirement to submit the ETR data to ENTSO-E after January 2021, but it has continued to be published on BMRS (which from 01 June 2024, was replaced by the Elexon Insights Solution). [CP1583](#) identified a number of reports where this data is already being sent as part of the obligations under REMIT (Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency) or has no data reported.

Therefore, following the approval of [CP1583](#) on 02 November 2023, the obligation for parties to submit EU Transparency Availability Data to the ESO via the Market Operation Data Interface System (MODIS) as specified in Operating Code (OC)2.4.7 is no longer required.

Why change?

As part of the Grid Code, relevant Users are obligated to provide EU Transparency Availability Data specified in OC2.4.7 in accordance with Schedule 6 of the Data Registration Code (DRC), which is sent via MODIS to Elexon.

The approved BSC modification [CP1583](#) removes the obligation for relevant Users to submit this data to the ESO as it is either no longer required or is already submitted via REMIT which is an Ofgem enforced obligation that sits outside of the Grid Code¹.

(OC)2.4.7 was never intended to cover REMIT obligations and this proposal does not remove the obligations under REMIT for relevant Users.

Elexon have now also moved from BMRS to a new data platform (Elexon Insights Solution), and as a result, any data submitted to BMRS will no longer be published.

What is the proposer's solution?

Remove the obligation for the EU Transparency Availability Data currently specified in Operating Code (OC) 2.4.7. in accordance with Schedule 6 of the Data Registration Code (DRC) to be sent from relevant Users to the ESO via MODIS and then to Elexon.

Legal text

See Annex 1

¹ [REMIT and wholesale market integrity | Ofgem](#)

What is the impact of this change?

Proposer's assessment against Grid Code Objectives	
Relevant Objective	Identified impact
(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity	Neutral
(b) Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);	Neutral
(c) Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;	Neutral
(d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and	Neutral
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements	Positive The proposed changes remove obligations that are no longer required which should improve efficiencies for impacted Users and remove duplication where data is already submitted via a separate process.

Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories	
Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	Neutral
Lower bills than would otherwise be the case	Neutral
Benefits for society as a whole	Neutral

ESO

Reduced environmental damage	Neutral
Improved quality of service	Neutral

When will this change take place?**Implementation date**

November 2024

Date decision required by

A decision is required at the Grid Code Review Panel on 26 September 2024.

Implementation approach

There will be no system changes required as a result of this modification.

Proposer's justification for governance route

Governance route: Self-Governance modification to proceed to Code Administrator Consultation.

The proposal removes obligations from relevant Users and improve efficiencies. There is no materiality as a result of these proposed changes with some Users already adopting these proposals.

Some Users have already ceased sending this data due to the ESO via MODIS due to being aware of the approval of [CP1583](#) via the approval circulation from Elexon.

The ESO have also made Industry participants aware of the removal of these obligations via the ESO Operational Transparency Forum (OTF).

Interactions

- | | | | |
|--|--|---|--------------------------------|
| <input type="checkbox"/> CUSC | <input checked="" type="checkbox"/> BSC | <input type="checkbox"/> STC | <input type="checkbox"/> SQSS |
| <input type="checkbox"/> European
Network Codes | <input type="checkbox"/> EBR Article 18
T&Cs ² | <input type="checkbox"/> Other
modifications | <input type="checkbox"/> Other |

This modification has been raised as a result of an approved BSC modification ([CP1583](#)).

Acronyms, key terms and reference material

Acronym / key term	Meaning
BMRS	Balancing Mechanism Reporting Service
BSC	Balancing and Settlement Code
CUSC	Connection and Use of System Code
DRC	Data Registration Code
EBR	Electricity Balancing Regulation
EMFIP	Electricity Market Fundamental Information Platform
ENTSO-E	European Network of Transmission Operators for Electricity
ETR	European Transparency Regulation
EU	European Union
GC	Grid Code
MODIS	Market Operation Data Interface System
OC	Operating Code
OTF	Operational Transparency Forum
REMIT	Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency
STC	System Operator Transmission Owner Code
SQSS	Security and Quality of Supply Standards
T&Cs	Terms and Conditions

Reference material

- [CP1583 Rationalising publication of European Transparency Regulation \(ETR\) data on Elexon Systems - Elexon BSC](#)
- [REMIT and wholesale market integrity | Ofgem](#)

Annexes

Annex	Information
Annex 1	Legal Text

² If your modification amends any of the clauses mapped out in Annex GR.B of the Governance Rules section of the Grid Code, it will change the Terms & Conditions relating to Balancing Service Providers. The modification will need to follow the process set out in Article 18 of the Electricity Balancing Regulation (EBR – EU Regulation 2017/2195). All Grid Code modifications must be consulted on for 1 month in the Code Administrator Consultation phase, unless they are Urgent modifications which have no impact on EBR Article 18 T&Cs. N.B. This will also satisfy the requirements of the NCER process.