

Public

# Call for input

Data inaccuracies in the Balancing Mechanism.

8<sup>th</sup> October 2025.

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## How to respond:

This call for input will be the primary source of industry feedback regarding data inaccuracies in the Balancing Mechanism so please complete all relevant questions below with supporting examples wherever possible.

Please return the completed form to [Marketreporting@neso.energy](mailto:Marketreporting@neso.energy) by 5pm GMT on 19<sup>th</sup> November 2025. If you have any questions relating to this call for input, please also contact [Marketreporting@neso.energy](mailto:Marketreporting@neso.energy).

## Confidentiality:

**Responses will be classed as non-confidential unless otherwise stated in your response.** By submitting a response, your organisation accepts that the feedback received could feature in feedback summaries and be shared publicly (including with regulators), with comments attributed to your organisation.

If you wish to share confidential information, please mark this in the table below and highlight any sensitive information in your response. None of the content in your response will be included in any public feedback summaries and would only be visible to NESO and the regulator if required for the purpose of this call for input. Confidentiality is subject to any obligations to disclose information, for example, under the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004 (EIR)<sup>1</sup>. NESO will not disclose information that you have provided to us and marked as confidential without consulting you first.

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<sup>1</sup> For more information on NESO's obligations under the FOIA and EIR please see the guidance for suppliers, contract partners, and other third parties working with NESO available on this page: [Freedom of Information and Environmental Information Regulations | National Energy System Operator](#)

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Respondent details (required)		Please enter your details	
<b>Respondent name:</b>	Kamil Nugumanova		
<b>Company name:</b>	Drax Group plc		
<b>Email address:</b>	Kamila.nugumanova@drax.com		
<b>Which best describes your organisation?</b>	<input type="checkbox"/> Consumer body <input type="checkbox"/> Storage <input type="checkbox"/> Demand <input checked="" type="checkbox"/> Supplier <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> System Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Industry Body <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Interconnector <input type="checkbox"/> Other (please state):		
<b>Please mark here if you would like your response to be treated as confidential:</b>	<input type="checkbox"/> Confidential (please specifically highlight confidential comments within your response)		

## Questions

1. Please express your views in the text box underneath each question in the table below,
2. sharing reasoning and examples relating to your feedback.
- 3.

Question 1
<b>Do you currently participate in the Balancing Mechanism?</b>
Yes
Question 2
<b>Do you agree with the data inaccuracies identified in Table 1?</b>
<p>We agree in principle that these data inaccuracies can occur, and we recognise the theoretical impacts of those inaccuracies. However, we are unable to assess the scale, frequency and materiality of these events and their impact, and believe that NESO is better placed to provide a thorough analysis and evidence base of the perceived issues.</p> <p>We also believe that the core issue with data inaccuracies is not the incorrect data itself but whether BMUs can achieve their stated position. Therefore, most inaccuracies identified in the consultation are attributable to technical characteristics of specific technologies, particularly intermittent renewable assets due to their inability to accurately forecast and control actual output. With regards to dispatchable units, most units are able to achieve their declared position (save for unplanned incidents) and should not have any material impact on system balancing actions or costs.</p>

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Additionally, there are sufficient commercial and regulatory drivers for BMUs to submit information which is true and reflective of the actual technical capabilities, including under the Grid Code, REMIT and associated Ofgem guidance.

With regards to contact information for BMU operators, it is our understanding that NESO already has a process whereby it sends out quarterly information requests to ensure contact details are up to date and correct. That said, we recognise that there may be communication shortfalls, specifically with regards to smaller participants or operators of multiple smaller units.

### Question 3

**Beyond the inaccuracies identified in Table 1, do you have further concerns regarding the accuracy of data submitted to NESO and published to the wider market?**

No, we have not identified any additional areas where inaccuracies may occur

### Question 4

**What do you believe are the factors, if any, that may prevent the submission of more accurate data for the items listed in Table 1 or any other inaccuracies you have identified?**

We have seen no quantitative evidence to suggest that any inaccurate data submissions from BMUs are intentional. The one area that we have previously flagged as a limitation that may lead to inaccurate data submission is the accuracy of reference data used by participants for their decision making. This specifically refers to the accuracy and quality of system forecast data provided by NESO. Another factor that may provide an incorrect signal is the view of interconnector flows. NESO has previously highlighted that interconnector flow forecasts can materially change closer to real-time and often lead to an increase in the number of actions the NESO needs to take in the BM. If the PN data for interconnectors is not updated and reflected in system forecasts in an accurate and timely manner, this can lead to a false or incorrect view of system conditions.

We would also highlight some limitations with the current use of skip rate reason codes. We believe the current reason codes are insufficient to explain why certain assets have been skipped by NESO. In particular, the 'Unavailable due to long notice' code is very generic and does not accurately reflect or explain the root cause of the issue that has led to skips. In our view, skip rate reason codes need to be improved to provide more detail and transparency of the true reasons the skip happened.

Overall, we are keen to see a wider assessment of the steps and decision-making points in the BM, including the accuracy of forecasts provided by NESO, the timing of data and forecast updates that may in of themselves materially impact system tightness, and the overall transparency of information available to all market participants that is used as a reference point for their own data submissions.

### Question 5

**Where do you think the largest data inaccuracies exist?**

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We are not able to provide that analysis as individual market participants have no access to the BM and metered data outside of their own submissions. We would welcome a detailed and evidenced analysis from NESO to demonstrate where the largest data inaccuracies exist.

### Question 6

**What do you believe the impact of these data inaccuracies is?**

We are not in a position to assess the materiality and scope of perceived data inaccuracies. We believe NESO has the tools and access to all market information to be able to carry out a thorough and evidenced analysis.

### Question 7

**What solutions do you think would mitigate the issues caused by these data inaccuracies?**

We are not convinced there is a clear problem statement or evidence-based issue identified in the consultation, therefore, we're unable to make specific improvement suggestions.

However, we note a number of recent improvements that are likely to improve data accuracy in the BM. Firstly, the implementation of GC0166 should improve the submission and use of data from battery assets. Similarly, recent improvements to Reserve and Response Service terms that require a minimum capability to be set aside for these services and to be reflected accurately in the BM, should also help NESO with a more accurate overview of the assets' true availability.

### Question 8

**How do current practices in data reporting affect your operations?**

There are strict practices in place to ensure market participants collect all the underlying data which must be available for reporting to Ofgem in case of potential non-compliance issues. Data collected include granular information about operating costs, including fuel costs and commercial and technical requirements that underpin our decision making and data submission in the BM.

### Question 9

**Are there any specific examples or case studies you can share that illustrate these data inaccuracies?**

No

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