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Call for input

Data inaccuracies in the Balancing Mechanism.

8th 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 by 5pm GMT on 19th November 2025.

If you have any questions relating to this call for input, please also contact 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

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Information Regulations 2004 (EIR)¹. NESO will not disclose information that you have provided to us and marked as confidential without consulting you first.

Respondent details (required)	Please enter your details
Respondent name:	Natasha Ranatunga
Company name:	EDF Energy
Email address:	Natasha.Ranatunga@edfenergy.com
Which best describes your organisation?	<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 checked="" type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Interconnector <input type="checkbox"/> Other (please state):
Please mark here if you would like your response to be treated as confidential:	<input type="checkbox"/> Confidential (please specifically highlight confidential comments within your response)

Questions

Question 1
Do you currently participate in the Balancing Mechanism?
Yes.
Question 2
Do you agree with the data inaccuracies identified in Table 1?
There are a number of in-flight strategic initiatives that may have an impact on the accuracy of data submitted to NESO. These interactive initiatives should be taken into account when determining what next steps NESO can take (e.g. Route to Market, CCP, RNP work on BM and Constraints reform).
Question 3

¹ 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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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?

We strongly believe that NESO's efforts should be focused on the measures that can achieve biggest impact on improving the accuracy of data whilst taking into account costs and operational risks.

If Market Participants are not responding to or engaging with the NESO on improving the accuracy of their own data; this may be due a knowledge gap where new market participants (or less technical asset owners) do not fully understand the breadth of their obligations. We believe that the NESO has a role to play in reiterating these obligations such as directing market participants to the open [letter](#) on dynamic parameters. We believe that the NESO needs to ensure that it is appropriately resourced so that it can target those market participants who continue to not adhere to the framework within which they should operate.

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?

Physical Notifications inaccurately reported across all BMU fuel types

The [REMA summer update](#) (July 25) identified PNs as a potential area for reform – specifically that PNs must match traded positions. Initial EDF views are that ensuring PNs matching traded positions would be challenging particularly for unpredictable/ uncontrollable generation.

The IT / system changes needed across the industry to facilitate this would be prohibitive. Each party that interacts with the BSC as well as Elexon and EPEX are likely to require substantial IT changes.

If the aim is to incentivise generators to deliver to their FPNs then there is the option of utilising the dormant Information Imbalance charge, currently set to £0/MWh under the BSC, and which can be used to apply a charge to the difference between FPN and metered output after accounting for balancing services delivery. An option could be to set Information Imbalance Charge to be similar to the Incremental Volume Cost (IVC) that NESO use to penalise non-delivery of Balancing Reserve. Underdelivering would see a BMU forced to pay the Positive IVC (the most expensive energy Offer action taken by NESO in the BM), and overdelivering would see a BMU receive Negative IVC (the lowest priced energy Bid action taken be NESO in the BM).

Bid-Offer Acceptance delays

Generators already face BM Non-Delivery Charges in the event that they do not deliver to their BOA level. This sees them pay back the higher of their Offer Price or Imbalance Price for under-delivering an Offer, or receiving the lower of their Bid Price or Imbalance Price for over delivering a Bid.

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As above with FPN delivery accuracy, if the intention is to incentivise generators to deliver to their expected output (in this case, FPN adjusted by BOA), then introducing a non-zero information imbalance charge will result in extra penalties being applied over and above those of non-delivery charges.

Dynamic Parameters

The expectations in relation to the accuracy of the dynamic parameters has been clearly set out by Ofgem in its Sep 2020 open [letter](#). If market participants are not complying with their obligations under the Grid Code and REMIT when submitting their dynamic parameters to the NESO, then this should be addressed directly by NESO in the first instance.

This may require NESO to invest more time monitoring and policing those parties that regularly breach dynamic parameters – a similar approach to that adopted through its Wind FPN accuracy programme.

Control points not clear

Improving and centralising the NESO onboarding process for new generators and the transfer of Control Point/Trading Agent/Lead Party between existing parties would help alleviate the discrepancies and clarify roles and responsibilities. This could be done, for example, by implementing for new generators a ‘fit and proper’ checklist which contains all the requirements of the new generator and their completion, from providing up-to-date contact details to the NESO to confirming they understand their obligations under the Grid Code (requirements to maintain accurate data like PNs, operational metering etc). The asset owner would sign off each item on the checklist and be accountable for any item that is not completed. The centralised onboarding/transfer of obligations checklist could be governed by Ofgem such that any non-compliance with it could be enforced by the regulator.

There is a need to ensure that NESO’s Control Room back-end systems are aligned with the systems that market participants have used to register themselves and their assets with NESO. We believe that the NESO should undertake a project to reach out and contact all existing market participants to verify that the NESO holds the correct details. If there are mismatches, then the onus is on the market participant to provide the details.

Inaccurate Operational Metering data

We understand that when assets are commissioning, the metering systems are inspected and signed off by NESO, and NESO also require pre-qualification tests for assets looking to deliver NESO services. Therefore, we believe that the NESO should set out what is the scale of inaccurate operational metering data being received and the consequential challenges it creates for the control room. This will help to determine the magnitude of the problem, whether it is a cross-industry issue or specific market participants.

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Question 5

Where do you think the largest data inaccuracies exist?

Question 6

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

Question 7

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

Inaccurate Operational Metering data

If there are regular and unexplained issues between operational and settlement metering, then the NESO needs to focus on these assets and engage with the market participants directly. The NESO could consider some form of information imbalance penalty / charge to be introduced that sees costs incurred for deviations between settlement and operational metering. A targeted measure could have a big impact on improving the accuracy of data whilst minimising costs and operational risks for the wider industry.

We believe that NESO should be appropriately resourced in order to enable them to target and address market participants who are not adhering to the existing commercial and operational framework. There may be a role for NESO to provide support to new market participants for a period following the commissioning of a new asset.

NESO need to provide more data and evidence to illustrate the magnitude of the data inaccuracy issue and the impact it is having on the NESO's ability to operate the system. This should enable the industry to support the NESO to develop a solution that is proportionate and targeted.

Question 8

How do current practices in data reporting affect your operations?

Question 9

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