

Balancing and Settlement Code (BSC) P497: Enabling publishing of REMIT data directly to Elexon and replacing MODIS as a submission method (P497)

Decision	The Authority ¹ directs that this modification be made ²
Target audience	National Energy System Operator (NESO), Parties to the BSC, the BSC Panel and other interested parties
Date of publication:	23 February 2026
Implementation date:	5 November 2026

Background

The Wholesale Energy Market Integrity and Transparency (REMIT)³ Regulations (EU) No 1227/2011, require market participants to publish inside information. This data helps ensure transparency and prevents abuse of the GB wholesale energy market. REMIT was incorporated into UK law following the United Kingdom (UK) leaving the European Union.

On 31 December 2014, BSC Modification P291 ‘REMIT Inside Information Reporting Platform for GB Electricity’⁴ established a central platform for publishing inside information on Elexon’s Balancing Mechanism Reporting System (BMRS).

¹ References to the “Authority”, “Ofgem”, “we” and “our” are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day-to-day work. This decision is made by or on behalf of GEMA.

² This document is notice of the reasons for this decision as required by section 49A of the Electricity Act 1989.

³ [Regulation - 1227/2011 - EN - REMIT - EUR-Lex](#)

⁴ [Balancing and Settlement Code \(BSC\) P291: REMIT Inside Information Reporting Platform for GB Electricity | Ofgem](#)

Market participants could submit their data directly to BMRS through the Elexon Portal or via a Grid Code submission to National Grid Electricity Transmission (NGET, now the National Energy System Operator, NESO), which was then forwarded to BMRS. The BMRS was replaced in April 2024 by Elexon’s Insights Platform, consolidating market data services into a single interface.

Currently REMIT submissions to NESO use their Market Operations Data Interface System (MODIS). These are forwarded to, and published on, Elexon’s Insights Platform. NESO plans to decommission the REMIT data submission functionality within MODIS as part of a move away from a legacy, multi-purpose system that was not designed to be the long-term platform for REMIT reporting. While MODIS also supports other functionality, P497 is limited to the removal of MODIS as a recognised route for REMIT inside information submission under the BSC. P497 also enables an alternative submission arrangement directly to the Insights Platform to ensure efficiency and resilience in REMIT reporting.

The modification proposal

P497 was raised by NESO on 7 August 2025. NESO plan to retire the REMIT submission option in MODIS. A new submission route using Elexon’s Insights Platform infrastructure, enabling direct Application Programming Interface (API) submissions, will provide an alternative option for industry. This will be in addition to the retained option to submit REMIT data via the Elexon Portal for publishing on their Insights Platform.

The quorum required to form a working group was not achieved, preventing a group from forming. In its place an industry webinar was held on 22 October 2025. Two IT solutions for the new submission method were proposed: a full build solution and a minimal viable

product (MVP) solution. The view of industry was that Elexon should progress directly to the full build solution.

At the Interim Assessment Report stage, the BSC Panel (the Panel) questioned the cost (£380k) of implementing the full build solution. The Panel agreed to move to the Report Phase but asked Elexon to review the scope of this solution. Elexon developed a revised MVP implementation solution focusing on implementing the highest value features. This reduced the development time and cost by around 50%, whilst still meeting the needs of almost all REMIT users. One significant saving is due to not prioritising a new user management framework, which represented less than 1% of use cases. Not implementing this means that non-BSC Parties and Assets will not be able to use the new submission method.

At the Report Phase an industry consultation was held. NESO and three industry parties responded, agreeing unanimously that P497 should be approved.

Elexon's revised MVP implementation solution was presented to the Panel for final discussion. As the changes represented a shift from the original implementation route agreed by industry via the webinar and consultation, additional feedback from the consultation respondents was sought by Elexon. The respondents were comfortable with the revised approach. Additionally, the Panel discussed and unanimously agreed that the revised MVP implementation solution addressed their comments.

The proposer believes that the Modification has a positive impact on BSC Objectives (d)⁵ and (e)⁶ and will: -

⁵ BSC Objective (d) Promoting efficiency in the implementation of the balancing and settlement arrangements.

⁶ BSC Objective (e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]

- make the process of sending REMIT data simpler and more efficient.
- enhance reliability with Elexon maintaining both submission routes.
- improve latency and system uptime.
- help the UK stay in line with REMIT rules.
- make the process more consistent and easier to manage.

The implementation of P497 requires updates to BSC Section Q: Balancing Mechanisms, BSC Section V: Reporting and associated Code Subsidiary Documents (CSD's). As these materially affect how BSC Parties meet their REMIT inside information reporting obligations and introduce changes to participant authorisation and data submission processes, this falls outside the scope of Self-Governance.

BSC Panel⁷ recommendation

At the BSC Panel meeting on 11 December 2025, the BSC Panel unanimously agreed that P497 would better facilitate BSC Objectives (d) and (e) and the Panel therefore recommended its approval.

Our decision

We have considered the issues raised by the modification proposal and the Final Modification Report (FMR)⁸ dated 19 December 2025. We have considered and taken account of the responses to the industry consultation(s) on the modification proposal which are attached to the FMR. We have concluded that:

⁷ The BSC Panel is established and constituted pursuant to and in accordance with Section B of the BSC and Condition E1 of the Electricity System Operator Licence.

⁸ BSC modification proposals, modification reports and representations can be viewed on the Elexon website at www.elexon.co.uk

- implementation of the modification proposal will better facilitate the achievement of the applicable Objectives of the BSC⁹
- directing that the modification be made is consistent with our principal objective and statutory duties¹⁰

Reasons for our decision

We consider this modification proposal will better facilitate BSC Objectives (d) and (e) and has a neutral impact on the other BSC Objectives.

(d) promoting efficiency in the implementation and administration of the Balancing and Settlement Arrangements

The Panel consider this proposal is positive against BSC Objective (d) by making the process of submitting REMIT inside information simpler and more efficient. They believe that Market Participants will benefit from improved latency and system uptime, helping to streamline the data submission process.

We agree with the Panel that P497 better facilitates BSC Objective (d) by improving the efficiency of REMIT inside information submission and administration. Efficiency gains are achieved by reducing the reliance on multiple submission systems operated by separate organisations. Consolidating REMIT submission arrangements under Elexon simplifies governance and operational oversight, reduces dependency risk, and supports more efficient administration of the arrangements.

⁹ As set out in Condition E1 of the Electricity System Operator Licence.

¹⁰ The Authority's statutory duties are wider than matters which the Panel must take into consideration and are detailed mainly in the Electricity Act 1989.

The decommissioning of MODIS requires the BSC to remove the reliance on that system while continuing to support robust and effective submission arrangements. In this context, enabling an additional submission route via Elexon's Insights Platform is expected to improve efficiency through increased system availability, reduced latency and greater operational resilience. These factors contribute to more timely and reliable publication of inside information and support the efficient operation of the arrangements.

We note that MODIS is no longer used in practice for REMIT submissions, meaning that the removal of MODIS does not require changes to current submission behaviour. However, the decision to approve this modification proposal is driven by the formal decommissioning of the MODIS submission option and the need to ensure that the BSC continues to provide robust and efficient REMIT submission arrangements on an enduring basis.

We also note that, following the challenge made by the Panel, the final solution represents a reduced-scope and more proportionate approach. The projected implementation costs are expected to be offset over time through operational efficiencies and cost savings associated with a migration away from legacy arrangements.

(e) compliance with the Electricity Regulation and any Relevant Legally Binding Decision of the European Commission and/or the Agency

The Panel consider this proposal is positive against BSC Objective (e) as it supports the UK's continued compliance with REMIT following the UK leaving the EU. The Proposal will ensure market information continues to be securely published through Elexon. By having all data submissions under one organisation, the process becomes more consistent and easier to manage.

We agree with the Panel that the modification is positive against BSC Objective (e) as it supports the continued compliance with REMIT by ensuring that effective submission arrangements remain in place once MODIS is decommissioned. P497 does not change the underlying obligations on market participants under REMIT. Instead, it concerns the technical arrangements through which inside information is submitted for publication, ensuring that those obligations can continue to be met efficiently and reliably.

We note that the existing Elexon Portal would remain a compliant submission route on its own. However, enabling an additional API-based submission route alongside the Portal improves resilience and future-proofing, and provides assurance that REMIT inside information reporting can continue to be supported effectively over the longer term.

We also note that non-BSC parties will continue to have access to a compliant submission route via the existing Elexon Portal. The Panel considered this position as part of its assessment of the proportionality of the revised, reduced-scope solution, including in light of the small number of non-BSC submissions and cost and complexity considerations.

Decision Notice

In accordance with Condition E1 of the Electricity System Operator Licence, the Authority hereby directs that modification proposal BSC P497: Enabling publishing of REMIT data directly to Elexon and replacing MODIS as a submission method be made.

Maryam Khan

Head of Electricity Security and Market Management

Signed on behalf of the Authority and authorised for that purpose