Consultation on EMR data flows

We invite you to respond to the questions on this form. Please submit responses entitled 'Consultation on EMR data flows' to emr@elexon.co.uk by 5pm on 7 March 2014.

Your details

Respondent	Pavel Miller
Company name:	Energy UK
Email address:	Pavel.miller@energy-uk.org.uk
Role of stakeholder represented	Energy UK is the trade association for the energy industry. Energy UK has over 80 companies as members that together cover the broad range of energy providers and suppliers and include companies of all sizes working in all forms of gas and electricity supply and energy networks. Our membership includes potential CfD generators (transmission connected and distribution connected), CfD suppliers, CM suppliers, CM Capacity Providers (including CMRS Transmission CMUs and CMRS Embedded CMUs).
Does this response contain confidential information?	No

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Consultation questions

Option 1: Sending files as email attachments	
Question 1.1	Do you agree that sending and receiving electronic data files as email attachments is an appropriate mechanism for parties who wish to minimise their investment in IT systems? If not, what alternative would you propose?
Energy UK members do not believe that email attachment is an appropriate method of transferring data between parties as it is not a secure or reliable delivery route. It is also unclear whether email attachment would in fact minimise investment in IT systems, as no evidence has been provided in the consultation document to support this assertion. Some of our members have also highlighted concerns about additional administrative burden associated with having to open, extract and save data before it can be delivered to IT systems. Energy UK members' proposed alternative is to use existing DTN and CVA networks but retain flexibility so that parties who do not currently use those networks (mainly generators) can choose the most cost effective option for their individual needs. However, such an option introduces a new concept for the industry regarding adoption of a 'User Pays' approach. This particular is not an appropriate route to discuss such a major change to current Balancing and Settlement Policy principles. At a time when the industry is doing all it can to reduce the bill to end consumers, a thorough and robust cost-benefit analysis of all options must be provided.	
Question 1.2	Would you be likely to use this mechanism yourself? If so, would you see this as a permanent solution, or a temporary workaround?
Energy UK as an organisation will not be using the mechanism so we leave it to our members to respond.	
Question 1.3	Do you agree that XML is an appropriate open standard to use for the data files attached to these emails? If not, what alternative would you propose?
Energy UK members believe that use of XML would only be appropriate if using email.	
Question 1.4	Do you agree with our proposal that the settlement systems should also attach human-readable versions of each file (in PDF format) to outgoing emails?
Yes.	
Option 2: Other potential mechanisms for sending and receiving data	
Question 2.1	What do you see as the pros and cons of the options outlined above? Which option(s) do you see as most appropriate?
It is difficult to assess the pros and cons of each of the options - FTP; web services; and web portal; because of the lack of detail provided in the consultation. However, we are able to comment that none of the options appear to be an obvious improvement on the existing DTN and CVA network options, either in terms of fulfilling the task required, security, and robustness or in terms of cost-effectiveness.	
Question 2.2	Are there any other options that we should be considering?
There are no other options that we are aware of.	

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Option 3: Possible use of existing industry networks to exchange data	
Question 3.1	Do you agree that the DTN is the appropriate mechanism for HHDAs to provide data to the settlement systems (provided that the obligation to do so is in the BSC)?
Energy UK members agree that the existing DTN and CVA networks are the most appropriate mechanisms to provide data to the settlement systems. The infrastructure and processes are already in place to route data flows, maintain data relationships and maintain participant relationships. The DTN provides for the receipting of data flows and the functionality to trace flows allows missing data flows to be followed up, making it a more robust solution than any other option. In addition to the benefits of security and a system which is already understood by industry, this would potentially be a no incremental cost solution to industry participants. Furthermore, the DTN already provides a number of low cost interfaces that mitigate barriers to entry into the market. Elexon states that use of the DTN could "incur significant data transfer fees". While this may be the case for Elexon, Energy UK members are not aware of any evidence that there would be any incremental cost to industry parties who already use the DTN. ElectraLink has provided an estimate of the costs involved and anticipate that there would be 20% headroom on the DTN for EMR data flows, but there is currently limited information in terms of the forecast size of data flows. It is therefore difficult for Energy UK members to make a well informed assessment of the cost impact. Elexon must consider industry-wide impact and costs, rather than just its own costs. We would request that Elexon provides further analysis at the soonest opportunity and then re-consult with the industry.	
Question 3.2	Do you believe it is appropriate to allow existing networks (i.e. DTN and/or CVA network) to be used for other EMR purposes (unrelated to the BSC or other existing industry codes)? Please provide your rationale.
Energy UK believes that it would be appropriate to allow existing networks to be used for EMR purposes, as the majority of EMR parties are already connected to the DTN and the system functions reliably and securely. There is limited evidence upon which to assess the costs arising from using the DTN but ElectraLink has provided estimates, including no incremental cost for existing users, which suggest that costs would be reasonable (in the realm of £74,000). If Elexon has estimates to the contrary, Energy UK members would appreciate the opportunity to review and comment on this information.	
Question 3.3	Do you agree that the costs incurred in using networks in this way should be recovered from parties who choose to make use of this option? If so, should this apply to all such costs (including for example the costs of including appropriate functionality in the settlement systems.)? Or should it apply only to those costs directly attributable to individual data recipients (e.g. DTN data transfer charges)?
In order to answer this question in an informed way, Energy UK members require clarity on how costs associated with EMR related changes are funded. We believe that costs associated with the development of new functionality of settlement systems will be funded by a DECC EMR grant with only costs directly attributable to individual data recipients recovered from parties. Energy UK members would support this approach provided all costs are transparent and fully accountable. However the principle being introduced here in the form of 'User Pays' must form part of a wider debate.	

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Question 3.4	What changes would be needed to existing codes or Licenses to allow the DTN and/or CVA network to be used in this way?
We understand that in order for the DTN to be used for other EMR purposes minor changes would be required to the Data Transfer Services Agreement (DTSA) to allow market participants who are EMR service users to accede to the DTSA. In effect, this would add generators and, possibly, Demand Side Response customers to the list of market participants who currently use the service.	

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