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	*Andrew Colley*
Company name:	*SSE plc*
Email address:	*Andrew.colley@sse.com*
Role of stakeholder represented	*Please state the role of the stakeholder/stakeholders on whose behalf you are responding (delete as applicable):* ***CfD*** *CfD supplier* *CfD generator: Transmission connected* *Distribution connected* *Private wire* ***Capacity Market*** *CM Supplier* *CM Capacity Provider* *CMU type: CMRS Transmission CMU* *CMRS Embedded CMU* *Non-CMRS* *Customer Demand Response*
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?
We do not believe sending and receiving electronic data files as e-mail attachments is a suitable data exchange mechanism. ELEXON summarise quite well the issues and risks associated with the mechanism, particularly security concerns. If potential breaches of security for one Party impact other Parties, who have chosen a more secure method, then this method should not be deployed. *Potentially Secure FTP/Web Services becomes the minimum standard for smaller Parties, depending upon the frequency of the updates and thus the size of data to transfer. If the size is within that which is considered acceptable for a Web Service payload (which cannot be determined from the information provided), then this may present a more elegant solution. Otherwise Secure FTP should be utilised.* *Having said the above, we are concerned about the implications of moving from a pipe delimited to an XML file format, as the size of an XML file is significantly larger and thus will create greater development, maintenance and storage overheads for participants to handle, interpret and store the data files. We are concerned that the consultation document purely assesses the options from a qualitative perspective with no further quantitative (sizing, frequency and costing) estimates provided for consideration. We are not sure that industry can make a wholly informed decision on the possible options without provision of further information and analysis of the potential numbers involved by ELEXON.* *For example, BSC Issue 52 has already been debated by industry and showed a clear appetite to remain with the DTN as a cost effective data transfer mechanism, and we understand that the DTN is capable of supporting XML file formats. This is not adequately discussed or analysed within the document.*	
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?
No, we would not entertain using e-mail even as a temporary solution, principally owing to the security issues associated with this mechanism. Secure FTP could be used far more satisfactorily were a temporary workaround required.	
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?
Were you to pursue this option, then yes, XML is a general industry standard and should be used – Schemas define what is valid and thus reduce errors in communication. *However, we would reiterate our comment from Q1.1 above that we are concerned about the sizing implications associated with moving to XML file structures with little information to support or assess the business justification for doing so.*	
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?

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We don't support the use of e-mail as a communication method, so in principle no. Were you to pursue the option however, rather than attaching additional PDF files it may be possible to provide a transformation file for the XMPL that would allow it to be displayed as HTML.

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?

Web Services is an open standard and supported by most modern applications. This reduces the set up costs and also keeps the communication in line with most companies' integration standards and policies.

It is recommended to look at using REST rather than SOAP to keep the integration mechanism simple as it is not believed the full WS- standards that come with SOAP are required.*

However, as indicated in our previous responses, we are concerned about the potential sizing and associated cost implications of pursuing this option. Depending upon the frequency and splitting requirements of the data to be sent, it may not be valid to use Web Services if the size of the data set is unduly large. We would urge ELEXON to present more in depth analysis of its sizing and costing assumptions to justify any decision to move away from the current standards.

If Web Services are not appropriate due to the size of the data, Secure FTP would be recommended. This provides the security and is simpler than e-mail to integrate.

We are not convinced of the need for a web portal, unless there is a belief that such a mechanism will be needed to provide expanded services in the future, in which case we would question what those services are likely to be.

Question 2.2	Are there any other options that we should be considering?

Yes – leveraging existing mechanisms such as the DTN, as explored in Option 3. Other than that, then no as Web Services is the open standard.

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)?

Yes, it makes no sense to force HHDAs to introduce a new and potentially largely redundant communication mechanism. DTN should be retained as suggested.

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.

In principle yes, as it is likely to be the most cost effective and efficient mechanism, however it would create a new use case for these networks, and as such governance and cost recovery issues would need to be satisfactorily resolved.

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

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	(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)?
SSE agree that costs incurred should be recovered from parties who choose to make use of the option to leverage existing networks – EMR data transfer users will be different to BSC and MRA users, and therefore should pay an appropriate proportion of the costs of providing the service. SSE view that all associated costs, to the extent that they can be reasonably identified and attributed (without creating an overly onerous administrative overhead), should be passed on to EMR users of the service – a degree of pragmatism should be applied in doing so however.	
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 agree with your high level view of the likely changes required, principally to enable use of the services for a different use case in the first place and subsequently to ensure effective change management capability, but would encourage ELEXON to further discuss the options with the relevant Code Administrators to establish and consult upon a fuller assessment of the likely impacts on relevant industry codes.	

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