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	*Colin Prestwich*
Company name:	*SmartestEnergy Ltd*
Email address:	*Colin-Prestwich@smartestenergy.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 -- Yes* *CfD generator: Transmission connected -- Unlikely* *Distribution connected -- Possibly* *Private wire -- Unlikely* ***Capacity Market*** *CM Supplier -- Yes* *CM Capacity Provider* *CMU type: CMRS Transmission CMU -- Unlikely* *CMRS Embedded CMU -- Possibly* *Non-CMRS -- Possibly* *Customer Demand Response -- Possibly*
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 are not entirely convinced this is appropriate for non-human readable files, for reasons of size and security. We believe that FTP could provide a good compromise (if use of the CVA Network/DTN is prohibitively expensive) as files can be received with relative ease. However, we would prefer to extend use of the CVA Network in conjunction with the pipe delimited file format as it would be easier for us to extend current systems. We believe that most participants have this in place for receipt of the I014 file, for instance (generators as well as suppliers) and where this is not received Parties would probably prefer something simple such as emailed PDF. In essence, we believe that where data/infrastructure already exists within the industry it should be utilised rather than replicated	
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?
Email may be useful as a back-up in the event of system problems and for low volume, human readable documents	
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?
We have a preference to stick to the file format of files which are currently sent across the DTN and CVA Network i.e. flat file pipe delimited. If not using the DTN or CVA Network, it may be dependent on what's appropriate to the content XML, CSV or PDF. We note however that XML files can be around 20 times bigger than the flat file equivalents. *EMR is not going to lead to a great increase in the numbers of new file types. This is why we believe it is appropriate to extend current systems rather than try to overhaul the entire system. This is not the opportunity to start to move the industry to a different method of communication as it could lead to developing new platforms as well as needing to maintain old ones. If there is merit in moving to XML and changing communication this should be analysed in the context of the whole system.*	
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. For smaller parties it is essential that a human readable version is emailed. This is our primary source for the current Elexon bill and is very useful.	
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?
Our preference is to use current existing infrastructure where possible (CVA Network/DTN). For the submission of	

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data we think web services may be the way to go as this can allow participants to automate interfaces or submit manually without Elexon having to provide a wide range of systems to receive the data. We believe data should be 'pushed' to recipients, not have to be 'pulled' so webportal is less attractive	
Question 2.2	Are there any other options that we should be considering?
No	
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. We agree that Data Aggregators should continue to use this format as it is standard.	
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.
Yes. At the end of the day, this is all industry data.	
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)?
Regardless of the extent to which the DTN is used it is reasonable that the development costs should be paid for as part of EMR development and/or spread across industry on an MPAN market share basis and the only charges for data traffic should be passed on directly.	
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?
No comment	

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