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	*Frank Gordon*
Company name:	*Renewable Energy Association (REA)*
Email address:	*fgordon@r-e-a.net*
Role of stakeholder represented	*Please state the role of the stakeholder/stakeholders on whose behalf you are responding (delete as applicable):* ***CfD*** *CfD generator: Transmission connected* *Distribution connected* *Private wire* ***Capacity Market*** *CM Capacity Provider* *CMU type: CMRS Transmission CMU* *CMRS Embedded CMU*
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 agree this is an appropriate mechanism for those wishing to minimise IT investment costs and manage their CfD or CM contracts in a straight forward way, therefore especially welcome for small scale parties. *However our preferred option (see below) would be a combination of email alerts and web-based data, combining the best of both worlds of active notification of parties and a secure data storage system not requiring detailed expertise or familiarity with existing BSC/Elexon processes that only larger players will have.*	
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?
N/A	
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?
XML is a widely used format in the industry and IT systems we understand, therefore can see no reason to disagree, however note that using such file formats still requires a degree of technical competency and knowledge that many are not equipped for.	
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, definitely, this will allow for double checking and is vital. However with daily emails with multiple attachments, including pdfs, it could be the case that, over holiday periods especially, nominated individuals' inboxes are clogged up with multiple emails containing potentially large attachments. This could lead to emails not being delivered, as inbox size limits are breached, meaning that companies could miss vital emails. *For this reason we propose a combination of email alerts and FTP/web browser data flows (see below).*	
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?
The pros of this option (using a secure FTP to store data files, a more bespoke web service or a web portal for downloading reports) are that the data would be more secure than being sent over email, without the risk of non-delivery. The option would also mean that parties would not need any knowledge or experience of existing BSC or other industry DTN/CVA networks, which would penalise new and smaller participants especially. *The cons include that parties would need to periodically login to the service which runs the risk of deadlines being missed.*	

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

Yes. In our view there is scope to combine the email and FTP/web browser options.

This would combine the benefits of email alerts (signalling the participant to check their data) and web-browser/FTP option (a secure easy to access data store). While avoiding potential detrimental impacts on smaller and new market entrants inherent in the use of DTN or CVA options.

In practice, the party would receive a brief email once new data was waiting for them on an FTP/web service and then be expected to login to the FTP/web service to view or download the data (a web portal may be useful so that it could be accessed by both humans and automatic formats).

This process would avoid the main drawback of the web based system, that of parties needing to proactively request data from Elexon, by combining with the main benefit of the email process (immediate notice that data is available and should be accessed). At the same time avoiding the concerns around security of delivery (by not transmitting any actual data over email).

The potential problem (see Q1.4) noted with regard to multiple large email attachments triggering inbox size limits to be breached should be avoided as each email will contain only a very brief prompt to check the FTP/web-service with a link to the new data and therefore not exceed inbox size limits.

We believe using DTN or CVA systems would be inappropriate as new and smaller players would lack knowledge of the systems and therefore face resource challenges to comply with them that would disadvantage them, which is contrary to stated government policy on the market structure of the energy sector.

We would not be opposed to a process based entirely on emails, as this has the befit of simplicity and accessibility, however this would be second in preference.

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)?

Providing that only existing HHDAs would be required to use this approach, as they are familiar with the process and larger players, we agree that this would be appropriate.

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.

Provided it did not disadvantage other participants not part of these networks, and there were clear operational and logistical reasons to do so.

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)?

We do not have strong views. However we would note that if costs were not shared on the basis of the user

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paying for them, other participants might in effect be subsidising their operation.	
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 do not have any comments on this question but note the existing EMR Licences and Codes consultation (which closed 12 February 2014) and the need to ensure any such changes (if required) were coordinated.	

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