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	*Mari Toda*
Company name:	*EDF Energy*
Email address:	*mari.toda@edfenergy.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?
On balance, no. We recognise that the use of sending and receiving electronic data files as email attachment has some merits but it is not our preferred or recommended solution. We acknowledge that the mechanism may be a pragmatic solution for small companies with no access to the existing industry flows. However, potential users of this mechanism should be mindful of two issues – security (as highlighted in the consultation) and administrative burden. From a security perspective, our main issue is the potential for the data to be intercepted or become corrupted. These arrangements will be for multi millions of pounds and if they can be brought down by someone acting unscrupulously or simply because of email viruses etc., then it would appear to be a key risk for the industry. Operationally, e-mail attachments must be opened, extracted and saved before the data can be delivered to IT systems. We think it is important to choose a mechanism that is consistent with having a short settlement timetable, i.e. something that can be compiled, sent, received and validated in relatively short order so that the settlement timetable is as short as it can be and the requirement to post collateral is as low as it can be as a result. It would seem sensible for those parties wishing to minimise investment in IT systems to use an existing industry participant (a supplier/PPA offtaker) as their agent rather than (Option 1) use email attachments which may have security and admin issues or (Option 2) drive additional costs of developing alternative solutions.	
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.	
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?
While Option 1 is not our preferred/recommended solution, we agree that XML is an appropriate standard to use if this option is pursued. XML is widely understood and easily translated by common tools.	
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?
While Option 1 is not our preferred/recommended solution, it seems reasonable for the settlement systems to attach human-readable versions of each file (in PDF format).	
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

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	see as most appropriate?
Based on the information provided, we do not believe the development of Secure FTP, Web Services or a Web Portal are justified. Costs are a sensitive area as established industry participants will already have systems in place that can be used. For larger participants with access to existing flows, Option 2 would be yet another interface to support. For smaller participants, they are likely to have email already set up – for them, Option 1 may be a preferable solution over Option 2.	
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. This should prove a sensible option for most participants as they will already have these flows automated so changes should be minimal and it fits with existing models.	
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. Option 3 is our preferred solution. Existing networks should be used for EMR purposes. From the limited information provided in the consultation, we do not have a strong view whether this existing network should be the DTN or CVA (or both). However, if the data exchange occurs at the BMU level (i.e. the aggregate level), then it might make sense to use the CVA over the DTN because the CVA is used by both suppliers and generators. We note that for Supplier Agents accustomed to using the DTN to meet the data exchange obligations in the BSC, they would probably want to do the same in this instance. Existing networks have proved to be robust and reliable and we do not see a need to develop a completely new network for EMR.	
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 principle, yes. However, it is difficult to answer the second part of the question because no cost estimates are provided in the consultation. In addition to cost comparison data, it would also be useful if Elexon could explain which costs are covered by the initial set up costs that DECC would pay for so that we could form an informed view.	
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?

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A potential BSC change is something to support alignment of the various "entities" used in different governances. For example, could we align the aggregations of required meter data required under the BSC with those necessary for the CM and the CFD FITS arrangements: BM Units, CFD-FITS Units, CM Units.

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