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	*Andy Kelsall*
Company name:	*ScottishPower*
Email address:	*Andy.kelsall@dataserve-uk.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* ***Capacity Market*** *CM Supplier* *CM Capacity Provider* *CMU type: All types*
Does this response contain confidential information?	*If yes, then please clearly show which information is confidential.*

© ELEXON 2013

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?
Email is not an appropriate method of transferring data between parties as it is not secure and therefore not considered a viable solution. As for investment in IT systems/solutions parties will still have to develop processes to extract and process data upon receipt of the emails. Data invariably ends up being loaded into internal systems designed to validate the content of files, therefore a file load process would be developed anyway, requiring additional manual effort to detach and load files. *Alternative approach would be to use existing DTN and CVA networks.*	
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?
As specified above we would not expect to use email as a method of receiving flows, we would require flows to be sent via existing data transfer networks.	
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?
As stated we would not use emails, XML is not a solution we would be interested in either. *ScottishPower have a system for loading and validating flat files and our Software developer has indicated an initial one off cost for developing a solution for loading XML files. They have also indicated that each new flow load solution will cost more for XML file formats than existing flat file formats. This means our preference for any solutions are for existing flat file formats to be used and for these to be sent via the existing DTN and CVA networks.*	
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?
This would result in additional development costs for the IT provider appointed by Elexon, as they would have to develop PDF versions of files and any other agreed method (e.g. flat file or XML files). As a result the number of solution needs to be limited to keep down development costs	
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?

© ELEXON 2013

Secure FTP, Web Services and Web Portal

Pros

No evidence of the pros of these options when compared to the existing robust methods of sending and receiving files via existing DTN and CVA networks.

Cons

- *Data has to be requested by some application or human intervention adding time and complexity to the process*
- *Compares unfavourably with the existing DTN where data files are actively delivered to the recipient*
- *May add to delays between file being produced and subsequently loaded into internal systems*
- *Unknown reliability of alternative solutions*
- *Internal changes required to manage solutions resulting in costs to the Business*

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

Continued use of existing DTN and CVA networks.

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 the DTN is the appropriate mechanism.

However, we recognise that smaller operators may find these costs prohibitive and a barrier to entry. We therefore suggest that the DTN be the primary mechanism, with an appropriate parallel solution for those who require it.

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.

ScottishPower view is that it is appropriate to allow existing networks (i.e. DTN and CVA network) to be used for other EMR purposes (unrelated to the BSC or other existing industry codes).

All Suppliers and a number of Generators will be using these existing networks which are robust and reliable, so using these going forward seems to be the preferred solution.

Our understanding is that the DTS is designed to accommodate new users and new data flows and the DTS has sufficient headroom to support new data flows without incurring additional incremental cost to the industry. Data traffic will increase as a result of new flows but the volume of data per Supplier per annum is low (based on estimates provided by Elexon) and therefore shouldn't result in any significant increase to DTS charges.

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

© ELEXON 2013

	systems.)? Or should it apply only to those costs directly attributable to individual data recipients (e.g. DTN data transfer charges)?
ScottishPower view is that costs associated to new flows should be recovered from all parties, in a similar manner to how the existing DTSA arrangements. *We believe that any costs associated with the development of new functionality in settlement systems will be paid for via the DECC grant.*	
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?
In order for the DTN to be used for other EMR purposes (unrelated to the BSC or other existing industry codes) minor changes would be required to the Data Transfer Services Agreement (DTSA), which governs provision of the DTS. The changes needed would be 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.	

© ELEXON 2013