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 Baugh*
Company name:	*RWE npower*
Email address:	*andy.baugh@npower.com*
Role of stakeholder represented	*Vertically integrated energy company including CM generator, CfD Generator and supplier.* ***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?
It may be appropriate for parties who wish to minimise their investment in IT systems, however it is not suitable for large organisations such as RWE. This is because of issues such as; no guarantee of delivery, manageability of a potentially large number of files, and integrity and security of the communication route (i.e. vulnerability to hackers.)	
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?
We would not use this mechanism – even as a temporary workaround.	
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?
Yes. XML is an appropriate open standard – but not in conjunction with email delivery – see the response to 1.1 above.	
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?
We do not have a view on this proposal as we do not propose to use emails.	
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?
<u>Secure FTP:</u> *Pro; It is a proven mechanism with high integrity and has been used in the industry for a number of years* *<u>Web Services:</u>* *Pro; Has high integrity, security and manageability. Also is in current use for some industry flows.* *<u>Both Mechanisms:</u>* *Con; Cost – but existing routes are in place, and many parties already use these.*	

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Web Portal:

Pro; Has high integrity and security. May be appropriate for parties who wish to minimise investment in IT systems.

Con; Manageability is lower because it tends to rely on a user selecting and downloading files which can be a lengthy process. Also relies on the user to manage the storage and backup of the files whereas this can be done directly from FTP or Web Services mechanisms.

Regarding the points raised in 25; FTP and Web Services allow for the receiver to send an acknowledgement file to confirm that the data file has been completely received. A Web Portal solution would need similar functionality to address this issue.

***Conclusion:** Our view is that both Secure FTP and Web Services are the most appropriate mechanisms for data transfer for RWE (with a slight preference for the use of Web Services out of these two.)*

A Web Portal would be a suitable option (in addition to the provision of FTP/ Web Services) for organisations that wish to minimise investment in IT systems. Email, however, is not an appropriate mechanism.

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 would expect any interaction between HHDC or HHDA agents and 3rd parties to be via the DTN, and so would support the option to communicate via this method.

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 core BSC settlement performance is unaffected, we can see the advantages of this method. Any changes made to settlement systems in order to facilitate EMR must not jeopardise settlements in any way. We would welcome reassurance on this.

The DTN/CVA routes are established within the industry (e.g between ELEXON and BSC Parties) and would provide the security and integrity required – provided they are robust enough to handle the dual-functionality of settlements and EMR.

Allowing non-code signatories to utilise these networks could potentially be problematic. This issue requires consideration to ensure the proper safeguards are in place – especially given the importance of settlements.

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

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	systems.)? Or should it apply only to those costs directly attributable to individual data recipients (e.g. DTN data transfer charges)?
To provide an informed response we require clarity on how costs associated with EMR related changes are funded. We believe that costs associated with the development of new functionality of settlement systems will be funded by a DECC EMR grant with only the costs directly attributable to individual data recipients recovered from parties. We would support this approach provided all costs are transparent and fully accountable. However, the principle being introduced here in the form of 'User Pays# must form part of a wider debate.	
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?
Changes to enable the use of BSC networks to cover wider industry requirements other than those of the Balancing and Settlement functions for which they were originally set up. *We would welcome assurance that appropriate safeguards be put in place such that the core settlement functions of the BSC/DTN/CVA are unaffected by any other developments. This may necessitate inclusion within the codes and licenses.*	

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