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	Cem Suleyman
Company name:	Drax Power Limited Haven Power Limited
Email address:	cem.suleyman@drax.com
Role of stakeholder represented	Generator Supplier
Does this response contain confidential information?	No

© 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?
Yes. It will allow those that wish to minimise IT costs to do so.	
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?
Yes, although we expect this to be on a temporary basis or as a back-up solution.	
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 provides flexibility to the user, in terms of being able to manipulate the data for use by internal systems.	
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. Whilst not critical, this would be 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?
SOAP is an appropriate and well supported data transfer standard, which provides a level of flexibility for future development (this would be our preference). Secure FTP is another well supported standard and easy to set up, although it lacks the flexibility of SOAP. At present, the BSC Portal would be our least preferred option. It appears that manual intervention would be required in the first instance, i.e. logging on to the site and downloading the relevant documents. In terms of future automated data exchange, more clarity is required on the form it would take under this model (e.g. language used, access methodology, etc.) and whether this would require additional development work to Parties' internal systems. As a general point, Elexon must take account of the timescales required for market participants to implement IT systems. Market participants must have adequate notice to develop specifications, instruct service providers and implement the required changes to IT systems.	
Question 2.2	Are there any other options that we should be considering?
No comment.	

© ELEXON 2013

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)?
For those that currently use the DTN service (i.e. suppliers), the platform may provide a cost-effective data transfer system as the additional development costs of adapting this service are likely to be minimal (see answer to Q3.3 regarding usage costs). The DTN service has been used for many years, is a familiar/trusted platform and all MRA parties currently use the service. As such, it would seem sensible that this is one of the options made available to market participants. However, not all existing industry parties currently use the DTN service (e.g. generators). As such, DTN may not be a cost-effective solution for those parties. An alternative platform should be considered for those parties (e.g. SOAP or Secure FTP based). As a general point, Elexon must take account of the timescales required for market participants to implement IT systems. Market participants must have adequate notice to develop specifications, instruct service providers and implement the required changes to IT systems.	
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, provided the increase in traffic does not affect existing data flows, i.e. existing SLAs are preserved. In terms of the DTN, ElectraLink have previously made representations that there is sufficient bandwidth available to allow for additional data flows without a deterioration to the service. On that basis, we do not envisage any problems with taking this approach.	
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 believe a pragmatic approach would be to socialise fixed (network) costs and to target usage (data transfer) costs.	
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.	

© ELEXON 2013