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	*Holly Tomlinson*
Company name:	*The Renewable Energy Company Ltd (Ecotricity)*
Email address:	*holly.tomlinson@ecotricity.co.uk*
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*
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?
Yes, we believe this is an appropriate mechanism which will minimise IT costs as suggested. We suggest, however, that a prescribed template be provided in order to ensure consistency and avoid formatting errors.	
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?
Although this would not be our preferred option, we would be able to utilise this mechanism, if required to do so, without any significant difficulties. We would welcome this as a temporary option prior to introducing a more suitable flow system option.	
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?
Requiring parties to utilise standard XML format would lead to more potentially unnecessary coding work. Our preference would be for the XLSX, XLS or CSV formats. To our knowledge, CSV has been used extensively and successfully for similar automated industry mechanisms.	
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, this would be beneficial and would help ensure more clarity of information.	
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?
Secure FTP is our preferred option and it is a system that we have seen being successfully used by Elexon in its existing services. We are familiar and comfortable with its processes, and believe it is easily automatable through basic IT infrastructures, which is a notable advantage. Conversely, web platforms are not automatable and can be expensive to develop. I n addition, if not properly designed, they can become cumbersome and inefficient. We would like to draw your attention here to Ofgem's E-Serve platform, which brings significant IT costs and is often proven unfit for purpose and inefficient. Nonetheless, secure FTP, web services and web portal would all be preferable to email. *As noted below in section 3, DTN is our preferred option overall.*	

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Question 2.2	Are there any other options that we should be considering?
No, we believe all appropriate options have been covered.	
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 think that this is the most robust mechanism for exchanging data. It also has the added advantage of being a system that the majority of users will already be familiar with.	
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.
We are agnostic in relation to this issue.	
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)?
It would be reasonable to recover the costs from the relevant parties who utilise the system, but as long as the policy is consistent across all options (i.e. recovering the costs of a web platform from those who access it). The mechanism must also allow for cost recovery to be proportionate to each party's level of usage. Nevertheless, care should be taken to ensure that a cost barrier is not created for those parties wishing to use the most effective system but are forced onto inferior data exchange mechanisms as a result of affordability issues.	
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 are agnostic in relation to this issue.	

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