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	*Tom Breckwoldt*
Company name:	*Gazprom Marketing & Trading Retail Ltd ("Gazprom Energy")*
Email address:	*Tom.breckwoldt@gazprom-energy.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* ***Capacity Market*** *CM 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 we agree that attachments to emails would be an appropriate mechanism in the early days of the CfD FITs scheme as this would be a low cost option and straightforward for suppliers to adopt.	
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?
From our perspective as a supplier, who would be receiving invoices from the settlement agent, we would expect there to be alternative, more robust and secure options as the value of money being invoiced increases. We would expect electronic data files as email attachments to be used temporarily while the size of the scheme is relatively new and small.	
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.	
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, we think this is a good idea.	
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?
In terms of the other potential options we would consider Secure FTP or web portal as viable options. However, as stated below we think more detailed cost benefit information is required to make a more informed decision of the various options proposed. If use of the DTN was at no additional or little additional cost then this would be our most favoured solution as it a service we already utilise.	
Question 2.2	Are there any other options that we should be considering?
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.	

© ELEXON 2013

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.
It seems wise to investigate the use of existing networks as they will be the mechanisms that parties have experience in and are comfortable using. The DTN has been cited as potentially the most costly option in the consultation document. It would be helpful to see a comparison of likely costs between the different options which would aid the analysis of preferred options. If the DTN costs are comparable then this would be our favoured solution.	
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)?
As stated in the answer to question 12, some indicative figures of the likely costs and how they would be recovered would aid analysis of the different options.	
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?

© ELEXON 2013