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	*Nick Haines*
Company name:	*Good Energy*
Email address:	*Nick.haines@goodenergy.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*
Does this response contain confidential information?	*If yes, then please clearly show which information is confidential.*

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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, but you may also want to consider using an API web interface and provide users with a simple Excel spreadsheet whereby they can download the data that they require using a macro/vb.	
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?
Potentially, but only as a temporary solution. We would prefer integration with our current software and databases to provide a more permanent robust 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?
I think that smaller generators may not be capable of interpreting XML files and may resent having to invest in software to interpret the files, they would probably prefer a CSV format as it is straightforward to interrogate in Excel.	
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?
If the above is implemented then a pdf wouldn't necessarily be needed, unless it was providing some sort of aggregation or summary of the data.	
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 straightforward and can be automated relatively easily. *The selective download of data via web services is a sensible option and potentially reduces data requirements and complexity for the enduser and bandwidth for the data provider.* *The web portal is ok for but the automated data exchange would need to be slick for it to be suitable for suppliers and larger generators.*	
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)?

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Not necessarily, I think more work needs to be done in this area.	
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, but only if there are no knock on effects on the ongoing operation of the networks because of EMR. *Also, data should secure and so not be able to be shared between the different users of the network.*	
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 should only apply those that use the service.	
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?
TBC.	

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