

# Annex B - Form for providing respondents' feedback on proposed changes

## **Proposed change No. \* A.8.2**

The Agency proposes to introduce two new elements "intervalStart" and "intervalStop" into the complex type "capacity" and make the complex type repeatable. The change is applicable to both gas and electricity UMM schema.

## **Respondent's view \***

While ELEXON is supportive of ACER's proposal to allow Market Participants to report outages with capacity variation within a single message, we believe an alternative implementation would allow this functionality at lower cost to consumers. We believe it allows users to rationalise the messages that relate to the same event, especially Nuclear Power Stations which ramp down/up over several weeks.

This will help reduce the load on your data platform and ours from the amount of data submitted, as well reduce the load from users consuming the data via our UMM platform or Application Programming Interfaces (API). The brevity will also improve transparency for users and make published Inside Information data easier to decipher.

As the GB national Inside Information platform for electricity, ELEXON has been providing additional functionality for Market Participants. This allows them to report their outages as a profile by adapting the existing ACER's REMIT UMM Electricity Schema and REMIT UMM Other Schemas to create a single XSD for market participants to use. We have also created a sub-grouping within the Schema that allows the reporting of profile segments (Start/End and Capacity).

We note that "REMITUMMSchema\_V2" has combined all three Schemas into a single new Schema, with some existing elements still present e.g. the "event", with eventStatus, eventType, eventStart and eventStop but also some modified elements as well, i.e. intervalStart, intervalStop, unitMeasure, unavailableCapacity, availableCapacity and technicalCapacity.

While in principle, we believe the V2 XSD allows a better way to represent the outage events than the V1 XSD, we are mindful that Market Participants have just implemented changes to comply with Article 10 of Regulation 1348/2014, by providing a standardised webfeed to ACER by June 2017. The introduction of new data items would result in a significant impact on Market Participants who will require changes to their systems.

We believe the same outcome could be achieved by introducing minimal changes to the current V1 XSD, for example representing the main outage at high level together with a sub-grouping for the capacity changes. This could also allow ACER to support both versions of the XSDs more easily while allowing a transition period to Market Participants. We have included an example of how we have implemented this as a supplementary comment in ANNEX C (2).