

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

## **Proposed change No. \* A.6.4**

The Agency proposes to change the UMM schema in a way that all assets and/or units affected by an outage or unplanned maintenance (a single event affecting assets in the same way i.e. same timing) can be published with a single report.

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

ELEXON understands there can be cases where Market Participants wish to report on outages that can impact multiple assets within a single message. But using a single message to cover multiple assets appears to give opportunity to hide information on outages on the individual assets.

If, however, ACER proposes to adopt single messages containing multiple assets, we believe this can be achieved already without changes to the Schemas as Market Participants can report the changes using a Production Unit's Energy Identification Code (EIC) as the identifier within the message. Because of the potential to hide detailed information, we believe Market Participants will benefit from ACER guidance on scenarios where it will be useful to report outages using Production unit EIC.

The alternative, which perhaps ACER is proposing (?), of reporting of outages for different Generating Units within the same message could be confusing for our users. Such approach could lead inconsistency of reporting and make it difficult to reconcile with other data already published within the market; such as bid and offers and other trade data.

We believe our users would prefer a 1:1 relationship between the Production Unit and its related outage (or a Generating Unit and its related outage). It is also easy to distinguish between Production Units' or Generating Units' EICs; therefore this can be achieved without any changes to the current Schemas thus minimising impact on Market Participants submitting the data or users consuming the data.