

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.

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Proposed change No. * A.7.6

The Agency proposes that all mandatory schema elements that are of type string and have only maximal length defined have also minimal length=1.

Respondent's view *

ELEXON is supportive of this change and we have also introduced minimum length enforcement validation within our own Xml Schema Definition (XSD) to avoid some mandatory fields being submitted and displayed as NULL.

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

Proposed change No. * A.7.7

The Agency consults on the approach to introduce validation rules on mandatory fields, where appropriate, see some examples in the Reason for the change below.

Respondent's view *

ELEXON is in favour of introducing validation for the mandatory fields. This could result in an improvement in data quality. However from the proposal we are not clear whether the validations are limited to just structural validations against the XSD and/or ACER wishes to introduce additional business validation. We ask ACER to provide further details on the business validation rules (if required), together with sufficient notice to implement (12-14 months – see our separate comment Annex C(3) Implementation lead time) and a required implementation date.

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).

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Proposed change No. * A.8.3

The Agency proposes to change the Data Field No (17) Affected Asset or Unit EIC Code from optional to mandatory.

Respondent's view *

ELEXON supports this proposed change as the EIC will help achieve a consistent identifier for ACER and also for users who rely on interpreting REMIT Data to make business decisions.

Annex C - Form for providing additional changes and comments


ELEXON Comment C(1) XSD typographical error

Data type	REMITUMMSchema_V2.xsd
Impacted field(s)	<p>Market Participant element of the XSD is spelt incorrectly on the line 387 of the document</p> <pre></xs:element> <xs:element name="marketPaticipant" type="umm:marketParticipant"</pre>
Description of your change proposal/Other comment	Typo needs to be corrected
Motivation for the change	Correction is required to prevent unnecessary validation failure against the XSD

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ELEXON Comment C(2) XSD alternative Proposal

Data type	REMITUMMSchema_V2.xsd
Impacted field(s)	N/A
Description of your change proposal/Other comment	<p>As we highlighted in the response to question A.8.2; we believe the same outcome can be achieved with a simpler modification to V1 XSD. This would require introducing a sub grouping for reporting outage profile and we have included an extract below and embedded our full XSD.</p> <pre> <xs:complexType name="OutageProfileType"> <xs:sequence> <xs:element minOccurs="1" maxOccurs="200" name="OutageProfileSegment" type="OutageProfileSegmentType"/> </xs:sequence> </xs:complexType> <xs:complexType name="OutageProfileSegmentType"> <xs:sequence> <xs:element name="OutageProfileSegmentStart" minOccurs="1" maxOccurs="1" type="ESMP_DateTime" /> <xs:element name="OutageProfileSegmentEnd" minOccurs="1" maxOccurs="1" type="ESMP_DateTime" /> <xs:element name="OutageProfileSegmentCapacity" minOccurs="1" maxOccurs="1" type="CapacityType" /> </xs:sequence> </xs:complexType> </pre>

	 remit-umm example.xsd
Motivation for the change	<p>The benefits of sub-grouping are as follows. It provides simplicity for technical implementation and flexibility for Market Participants to use the profiling as they see fit. The profiling being optional can be helpful as not every outage will require a profile. The message will include a main event as well as optional profiles (in a parent child relationship); each profile segment will include event start/end and capacity. This has been positively received by GB electricity Market Participants submitting the data and users retrieving the data from our UMM platform. This could result in only minor modifications to the V1 XSD that will minimise impact as well as allowing more flexibility to support both versions of the XSDs during a transition period.</p>

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ELEXON Comment C(3) Implementation lead time

Data type	N/A
Impacted field(s)	N/A
Description of your change proposal/Other comment	<p>Implementation lead time</p> <p>If we need to implement a change to our Schemas, we estimate it would take 12 -14 months and significant cost incurred for our platform and for reporting parties. These would be unnecessary costs for the industry and so eventually for the consumer. If the proposed approach can be made with minimal changes to the Schema, this would greatly reduce the cost to Industry.</p>
Motivation for the change	