

DRAFT: “Consultation on Data Best Practice guidance and Digitalisation Strategy and Action Plan guidance”

Response of:

- Louise ALTER (ENGIE UK) on behalf of Zero Carbon Rugeley Smart Local Energy System (PfER Program)
- Michael Megarity – Programme Manager on behalf of Girona Project (PfER Program)
- Grant Wilson — on behalf of the RESO Project (PfER Program)
- Chris Dunham — on behalf of Greenscies (PfER Program)

DBP and DSAP scope and content

Question 1: Do you have any recommended improvements to the Principles, Explanations, Techniques or Examples?

Within the DSAP:

Principal 7: Interoperability by design

Provide examples of benefits for the organisation implementing best in class interoperability beyond the organisation and the sector e.g. readiness for smart local energy system which include for instance housing and mobility, trading and integration within the local markets...

Within the DBP

Principal 1

Clear system boundaries around Data Assets covered and not covered in addition to the *Energy System Data* definition would be welcomed either through examples or maps. Specifically the “ table 2: Stakeholder suggestions for data assets that should comply with DBP” could be used,

Principal 3:

“3.13. When the Licensee makes Data Assets available, it must do so in ways that make it easy for Data Users to gain information and/or insight from those Data Assets in conjunction with other Data Assets **incl. from other licensees**.”

3.14. The Licensee must make data available in such a way that it is reasonably easy for Data Users to: (i). exchange Data Assets between systems; (ii). interface with Data Assets held in the Licensee’s systems; and (iii). join Data Assets with other Data Assets **incl. from other licensees and industries**, such as by using standard interfaces, standard data structures and/or common reference data.”

Principal 5:

“Licensees must ensure that all potential Data Users can identify the Data Assets that the Licensee is the Data Custodian of, and how Data Users can pursue access to these Data Assets. Licensees must ensure that the Metadata associated to Data Assets is discoverable **and searchable** to Data Users, subject to the outcome of an Open Data Triage process.”

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Principal 9:

“The Licensee must ensure that compliance with this guidance does not negatively impact its compliance with all relevant regulations, legislation, and Security, Privacy and Resilience (SPaR) requirements. **The details of how the SPaR applies to the data collected from customers needs to be accessible and understandable for the customer to increase trust in the system”**

Principal 11:

We highly appreciate the modified data triage process focusing on the commercial benefits to the client “*commercial requirements that, if not protected, will have a negative impact on Products and Services for end-consumers*”. However, a question around control of the process remains open — how will the assumed open be tested against “necessity”?

Question 2: Are there any other Principles and Explanations you believe should be included?

Clarify what the benefits of the digitalising each products and services are as well as underline the importance of transparency around the security and functions of the new additions. This should enable more aligned goals/visions to be create.

Question 3: Are there any additional Techniques or Examples you recommend we include?

Providing examples around *Product and Services* and associated data covered by the guidance for both the DSAP and the DBP at the beginning of the document would be helpful.

An additional definition of “action” would also be welcomed

Question 4: Do you agree with our treatment of data literacy and skills and of data governance as pre-requisites to compliance?

No comment

Question 5: Do you have a suggestion for improving our definition of Energy System Data and therefore the scope of data assets energy network companies must use in compliance with DBP?

No comment

Question 6: What are your views on DBP guidance and DSAP guidance being used as our data and digitalisation standards and, if you agree, what applications do you envisage for these standards?

For the DBP guidance and DSAP guidance to be used as standards, standardised data capture would need to be included as well as a defined list of areas of data assets that should be covered by these standards. Especially when discussing new products to be launched into the market by new players guidance to ensure compatibility with the current environment would be beneficial. The higher the integration the more energy marketplaces will be enabled.

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Standardised formatted outputs and collection will also enable for better cross-sectorial integration specifically for transport and housing become increasing a player in the energy system. A clear description of system boundaries are required.

Question 7: What is your view on the Electrical Engineering Standards Independent Review (EESIR) recommendation for “presumed capture and publishing of data” in relation to our default positions (DBP guidance and DSAP guidance)?

Providing greater real-time visibility of data about the network and system state (including SMETER data) at all levels is a goal the DBP guidance and DSAP guidance should incorporate as well as standardised data capture (around time stamping for instance). This will avoid the need for duplicated sensors across the system as well as better integration as suggested per principal 8 in the DBP guidance

Question 8: Which gas and/or electricity market products/services (existing or planned) should be included in our upcoming data and digital monopolies review?

Data assets on the transmission and distribution network down to the 11kV/400V substations and LV distribution cables. Specifically looking at capacities (export and import), half-hourly data for the primary substation and the average or/and peak loads for theses network is key in (1) driving the expansion of renewable generation, (2) placement of other constraints in the system, (3) EV charger role out, (4) interaction in local flex markets and frequency response. As part of the DSAP the creation of a geographical map outlining capacities might be of advantage

In addition, the postcodes and MSOA gas and electricity dataset as we move to smart meters should be made available as half hourly datasets.