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24 June 2021

[www.nationalgrid.com](http://www.nationalgrid.com)

Dear Greg,

**National Grid Response to Ofgem's Data Best Practice guidance and Digitalisation Strategy and Action Plan guidance Consultation**

We welcome the opportunity to respond to Ofgem's consultation published on 25<sup>th</sup> May 2021 on the Data Best Practice guidance and Digitalisation Strategy and Action Plan guidance. This is a single response on behalf of National Grid Electricity plc (NGET) and National Grid Gas plc (NGGT).

In addition to the specific responses provided to the consultation questions, we are also highlighting the following points and questions to Ofgem;

1. The Guidance document as drafted does not necessarily protect network companies from being compelled into freely sharing data of a commercial value under the Presumed Open / Data Triage process. Whilst we agree in principle with the intention of this Guidance, we believe that network companies need to be able to evaluate whether capturing and publishing any data is economic and efficient.
2. We do not consider it reasonable or feasible to fully mitigate the risks associated with third party use of our data either at the point of publication and certainly not into the future.
3. We do not believe it is clear how the Guidance reconciles the Open Data principle with our legal requirements and internal policies on Data Retention (DBP Supporting Information document, page 50, section 3.93-3.99).
4. We also consider there is a lack of clarity around the expectations around the data asset retrieval processes to be utilised, documented and made available for the archived data, as well as the minimum expected retention period for the archived data assets. We would be grateful if Ofgem could provide additional clarity on these points.
5. Please can Ofgem clarify if there is an expectation that the supplementary information will go through periodic review as more ways of best practice are highlighted?

We have provided comments within the attached table in response to the specific questions within the consultation for both NGET and NGGT as well as specific suggestions on wording changes to the proposed text and reasons why.

For queries in relation to our consultation response, please contact [Jade.Ison@nationalgrid.com](mailto:Jade.Ison@nationalgrid.com) for NGET and [John.Brookes1@nationalgrid.com](mailto:John.Brookes1@nationalgrid.com) for NGGT.

Yours, sincerely  
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