

## DBP & DSAP Scope and Content

### ***1. Do you have any recommended improvements to the Principles, Explanations, Techniques or Examples?***

ElectraLink believes that these principles represent a vital step towards the digitalisation of the energy system, and we have no suggested improvements to the proposed principles in this consultation. The modern interconnected energy marketplace will increasingly depend on digitalised products and services, as well as an improved use of data across the energy market. These principles will allow this data to be shared more widely and used more effectively for the benefit of consumers.

### ***2. Are there any other Principles and Explanations you believe should be included?***

There are no other principles or explanations that we would suggest for inclusion.

### ***3. Are there any additional Techniques or Examples you recommend we include?***

There are a number of techniques across industry that can be used to improve parties' understanding of the different mechanisms that can be used to meet the principles for Data Best Practice (DBP). ElectraLink has over 20 years of experience providing data products to industry, and over this period, we have improved the visibility and access of data to industry parties. Our management of the DTS dataset has enabled ElectraLink to provide access to data to various parties in the industry and support innovation, whilst protecting data privacy.

Whilst the DBP principles did not exist when ElectraLink established our data services, our success in improving the visibility of data has been achieved by adhering to principles similar to those that were outlined in the DBP. A key principle central to our management of data has been structured, but flexible, governance and technical data structures that facilitate innovation. We have outlined examples of where this has met two of the key principles below and we believe this could be included in the guidance:

#### **Principle 6: Learn and deliver to the needs of current and prospective data users**

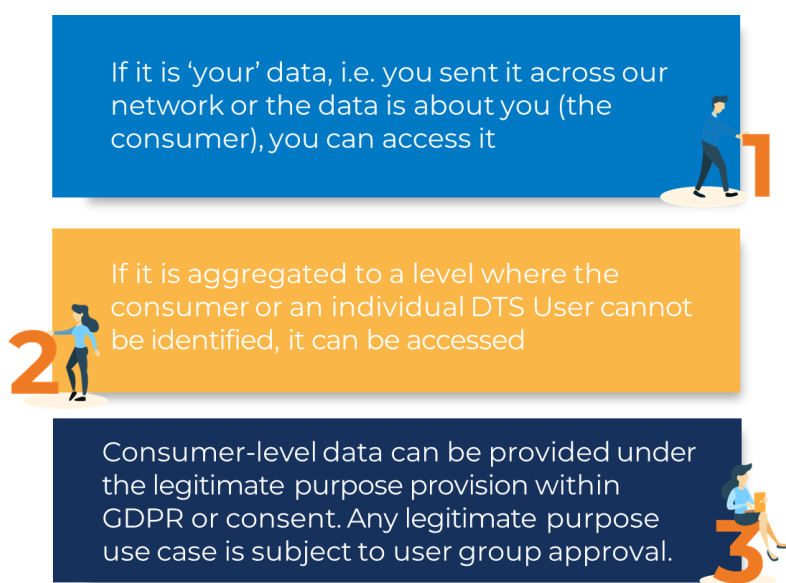
ElectraLink is the current provider of the infrastructure used to communicate data related to retail energy market. The Data Transfer Network (DTN) is part of ElectraLink's Energy Market Data Hub (EMDH), an accessible, scalable, and secure platform which has been designed to fully meet the data transfer needs of industry. This service is governed by the Data Transfer Service (DTS) User Group, which is constituted of elected members from a variety of market sectors who meet on a regular basis to review service performance, assess submitted change requests and represent the interests of DTS users.

Through consultation with the DTS User Group, ElectraLink established a flexible governance structure underpinned in the [Data Transfer Service Agreement](#) (DTSA). This allows the EMDH to operate data exchange defined across a number of industry codes (currently SPAA, MRA, BSC). It also allows for data between bilateral parties, using flows defined using FlowBuilder, and access to the data transferred

across the DTS for data analytics. The industry, via the DTS User Group and Ofgem, retain oversight of the DTSA and have direct visibility of any EMDH performance, service or governance issues relating to data sharing. The rules of data sharing can be updated as appropriate and when agreed by the industry, and this mechanism has been used to provide data to a range of market actors. As industry govern how the industry data we hold can be used, our governance arrangements reduce data risks (the wrong people accessing the data) and ensures the needs of current and prospective data users are met.

Through engagement with DTS parties and industry, ElectraLink has gained a significant understanding of the key barriers to the sharing of datasets and the establishment of governance arrangements to ensure the effective sharing of those datasets. Since 2012, ElectraLink has the permission (set out within Schedule 9 of the DTSA) to collect all DTS flows and hold this data for up to 12 years. Our ability to collect all DTS data flows enables ElectraLink to store, enrich and analyse the DTS dataset to provide insights to drive business value and operational efficiency, support innovation and drive market change for UK energy market participants, regulators and non-DTS parties. Our governance of the data is relatively simple, and this enables us to provide for current and future data needs.

Anyone can request access to the DTS dataset and ElectraLink, overseen by the DTS User Group, utilises a data triage process to provide access to data and this ensures that prospective users of the data can have their needs met:



This triage process does not restrict data access to a particular user or use cases, but rather works on the principles of when and how data should be accessed – **this enables ElectraLink to meet current and future needs of industry without making changes to our governance.** Examples of variety of use cases and users able to access to the data (via different mechanisms) include:

- National Grid's (non-DTS party) utilisation of ElectraLink's embedded generation dataset to support their forecasting of embedded generation output at MPAN granularity
- Ofgem's tracking of eServe ECO submissions
- ELEXON's use of settlement data to support their performance assurance
- WPDs use of the DTS dataset to identify low carbon technologies on their network

All DTS Users are able to discuss DTS issues or requests with their constituent member of the DTS User Group or ElectraLink. This ensures that all DTS participants can interact with, and influence, the future of the data service and that DTS data access can be shaped according to the needs of all current participants, and any future participants.

**Principle 10: Store, archive and provide access to data assets in ways that ensures sustained benefits**

We have significant experience of securely providing data to numerous industry participants through a variety of different methods, including SFTP and APIs. However, ElectraLink believes that the industry can move beyond singular transfers of structured, defined datasets, via SFTP and APIs, that need to be updated by the central data provider each time a customer wants to change the format or structure of the dataset. We have built our new analytics platform, EMPRIS (Energy Market Platform for Research, Insights and Statistics), and believe that EMPRIS can enhance how data is provided to industry to ensure that data access provides sustained benefits.

EMPRIS democratises access to energy data. It provides data users with more control over how data is presented and what they can do with it. The EMPRIS system allows energy market and 3rd party data to be shared, analysed and socialised in a secure web-based platform. With EMPRIS, ElectraLink is reproducing the data that underpins the retail energy market and is making it available in a granular, pseudonymised format, which can be interrogated and merged with third party datasets to allow for new insights.

EMPRIS provides industry bodies with defined reports to support monitoring (graphical or tabular), as needed by various parties, but also empowers these parties to interrogate the raw data (with the appropriate GDPR protections) and generate their own, new insights. Making the data available in new granular formats will move the industry beyond standardised monthly reports – enabling them to investigate, discover and derive a deeper understanding of the energy market.

ElectraLink believes that EMPRIS' method of storing and providing access to data assets is a model that industry should follow. By providing data that is more easily accessible, navigable on demand and more granular across the industry, with powerful tools for analysis built in as standard, this approach will drive digitalisation of the industry. If all data were to be stored, archived, and accessible in this way as standard, the industry would be far closer to using data in a way that ensures sustained benefits across the energy market and for the benefit of end consumers.

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

ElectraLink agrees that data literacy and skills and data governance are key to being able to meet the principles.

As outlined above, a structured, tried, and tested governance arrangement for data sharing, such as the Data Transfer Service Agreement, is essential to ensure that data risks are minimised, whilst the benefits of open data are delivered. We believe that the DTSA is a good example of how to govern data access within the energy industry, whilst maintaining GDPR and consumer privacy.

**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?***

ElectraLink does not have anything to add to Ofgem's definition of Energy System Data; however, we believe that it is important to review and prioritise the datasets that network companies must use in compliance with Data Best Practice to ensure that there is a positive business case to delivering these datasets.

Providing "All data relating to the operation of networks", for example, could result in significant overhead and costs for network companies; therefore, understanding the benefit to end consumers is essential to ensure that there is a positive business case, before this work is undertaken.

## Establishing Data and Digitalisation Standards and Upcoming Data and Digital Monopolies Review

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

ElectraLink agrees that these documents can be applied across all segments of the energy market. However, as we outline above in question 5, it is important that it is applied according to the relative benefit it brings. Therefore, industry parties should consider the benefits to consumers of enacting these principles before applying them to every area of their business and all datasets.

**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)?***

Whilst the "presumed capture and publishing of data" in the EESIR is ostensibly a great principle to apply, in practice, the guidance must be applied with an element of pragmatism, as mandating that licensed parties should do 'all that is possible' to publish data may not be cost effective or beneficial to end consumers.

ElectraLink supports improving the visibility of data and believes that this should be a priority for licensed parties. However, a cost-benefit analysis should be performed to ensure that this is not done at a net cost increase to consumers. Doing 'all that is possible' in advance of a use case from innovators or consumers *could* generate significant costs to consumers.

ElectraLink believes that, in advance of investing time and effort in publishing all datasets, industry parties would benefit from licensed parties making visible a description of the datasets that they have in their ownership, so that they can work with innovators to understand the net benefits to consumers. Publishing all datasets that would be beneficial for innovators pushes the cost burden onto consumers, via the licensed party, and not to the innovators themselves. A benefits case would help to identify positive consumer outcomes.

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

ElectraLink supports the proposal to review all monopolies. We envisage that this could include ElectraLink and other parties that manage smart metering, settlement, switching and flexibility, who, in the future energy system, will have control over aspects of important industry data. The aim of the review should be to improve consumer outcomes; therefore, we believe the review should focus on where the monopolies impact on industry and consumer outcomes.

As a central service, the DTS is a natural monopoly. Whilst the DTS service itself is a monopoly, access to DTS data and the ability to use this DTS data is not monopolistic. The DTSA enables third parties to create additional value by supporting the delivery of new markets and innovations, thereby enabling competitive markets and services to flourish. Regulation ensures a level playing field for users, to enable fair access to data that does not foreclose markets, as well as a focus on good outcomes for end customers.