

**Date**  
24 June 2021

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Greg Johnston, Market Data Policy  
Modernising Energy Data  
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Dear Greg,

**Consultation on Data Best Practice guidance and Digitalisation Strategy and Action Plan guidance**

Thank you for the opportunity to respond to Ofgem's consultation of Data Best Practice (DBP) guidance and Digitalisation Strategy and Action Plan (DSAP) guidance. This response is non-confidential and may be published by Ofgem.

In broad terms we support Ofgem's proposed principles-based approach as outlined in the consultation as this provides for a degree of flexibility moving forwards, which is required to both enable companies to respond to the market and stakeholders, as well as develop their own systems and processes in what is an entirely new data landscape. However, we have concerns that while the principles approach is appropriate, this is somewhat confounded by what appears to be very prescriptive and rules-based explanations of each principle. In some respects, the clarity of Ofgem's expectations is helpful, but may drive companies to tick the boxes rather than consider the broader intent.

Throughout development of the Digitalisation programme Ofgem has rightly recognised that this will be an iterative process where companies are encouraged to make data available when they are able and use early feedback and learning to improve and enhance services on a rolling basis. Implicit within this is that different companies will be at different stages of data maturity and all will require time to shape systems, processes and organisations to respond to open data and digitalisation efficiently.

The ability therefore for companies to adhere to Ofgem's proposed principles in the short-term is problematic. It is not obvious from this consultation whether there is an expectation that companies will comply immediately or that they work towards compliance during the course of the RIIO2 price control. Given Ofgem's pragmatic stance to date, we anticipate the latter approach is what is intended, but would appreciate clarity from Ofgem in that regard.

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

The Energy Data definition is applied to historic, current and forecast data. It is unclear if the standards - especially for metadata and programming scripts need to be met for historic and existing data. Given dynamic development of data management practice and the wider technology advancements in recent years, certain information will not be



available (or was not created when the product or service was built) and the time and cost of producing the supporting information or improving the quality of historical data to that proposed under the consultation standards can be significant. At the same time there might be instances where the programming scripts are not available to Data Custodians or they form part of our Data Processors' Intellectual Property. Therefore, we would suggest there should be differentiation in the explanation to account for the possibility of incomplete supporting information for historic data.

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

We do not have proposals for any additional Principles.

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

We do not have any additional Techniques or Examples to recommend.

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

We agree with the statement that data literacy and data skills are vital enablers to our ability to digitalise and improve the use of data. At the same time, we recognise that current maturity levels within the energy sector are variable and typically at a low level requiring ongoing efforts in increasing both data literacy and skills. Therefore, the ability to comply with the guidance, effectiveness and sophistication of the adopted techniques must be assessed alongside the organisations data maturity level to mitigate negative impacts on the development of products and services.

There is a significant cost and resource challenge associated with bringing new skills to organisations in the energy sector as the pool of available suitably qualified personnel is relatively shallow. This in itself will present difficulties to the pace at which networks can reach the required levels of data maturity. Although it is too early to reliably predict the costs of achieving data maturity and responding to additional requests for data from stakeholders, we anticipate this could present a significant funding challenge for networks and their customers.

**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?**

While we agree with the broad definition based on licensed activities, in some respects it may be too wide ranging without some qualification. It would be beneficial to define or provide guidance on data that would not fall under the data asset definition. In particular data asset defined as "all data held due to being a regulated entity" could be interpreted in its widest sense whereas, we believe Ofgem's intent is to provide data related to the networks activities as they may impact or be of use for stakeholders rather for example, how many laptops we purchase. We would therefore welcome some guidance from Ofgem that defines data assets as being those required to fulfil our obligations to convey gas or electricity and makes a distinction with more generic business assets that are required to run any normal organisation.

**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?**

DBP and DSAP guidance should be treated as aspirational targets on data and digitalisation to reflect: (1) the data literacy and skills growth required to comply with the proposed guidance and to allow organisations to secure the required funding for acceleration in maturity in this area; (2) need for development of the relevant standards



where not yet defined (e.g. " gas CIM") to ensure the collaboration in this matter is not de-prioritised by shifting the focus to individual organisations' compliance to the proposed guidance.

**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)?**

Although this does not apply to gas, we agree with the statement that practical construction and interpretation of the principle would be premature at this stage and learnings from compliance with DBP and DSAP should inform discussion on real-time visibility of captured data.

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

Although the consultation provides only a brief description of the proposed data and digital monopolies review, there may be value in Ofgem considering sources of aggregate and anonymised customer data held by networks or their service providers in electricity and gas. For example, some Local Authorities have expressed a need for aggregated gas customer information from Xoserve to inform their future development and decarbonisation plans. It is likely that similar requests may be made of electricity network data service providers. This could equally be extended to the Retail Energy Code, DCC and Central Switching Service. Any changes that may follow the review may require modifications to energy codes to facilitate provision.

We trust the information provided within this response is helpful and would be pleased to discuss any aspects of it should you wish to do so.

Yours sincerely,

**Marta Czerep**  
**Head of Data Information Services**  
***By email***