

OfgemDataServices@ofgem.gov.uk

Avonbank
Feeder Road
Bristol
BS2 0TB

Email pbranston@westernpower.co.uk

Greg Johnston,
Senior Manager - Market Data Policy
Office of Gas and Electricity Markets,
10 South Colonnade, Canary Wharf,
London,
E14 4PU

Our ref

Your ref

Date

22 June 2021

Dear Greg

Consultation on Data Best Practice (DBP) guidance and Digitalisation Strategy and Action Plan (DSAP) guidance

I am writing on behalf of Western Power Distribution (South Wales) plc, Western Power Distribution (South West) plc, Western Power Distribution (East Midlands) plc and Western Power Distribution (West Midlands) plc in relation to the above consultation.

Introduction

Western Power Distribution's (WPD) welcomes the opportunity to respond to Ofgem's Consultation on Data Best Practice (DBP) guidance and Digitalisation Strategy and Action Plan (DSAP) guidance, released on 25th May 2021.

WPD is hugely supportive of the progression of data and digitalisation products and services in the electricity industry and to the energy system more widely, demonstrated through our proactive approach to this point captured in our [Digitalisation Strategy and Action Plan](#). We have consistently taken a lead role in this area, demonstrated through, amongst other initiatives, working collaboratively with Energy Systems Catapult (ESC) to deliver our Network Innovation Allowance (NIA) project, Presumed Open Data; delivering insight to the energy industry in approaches and stakeholder needs to ensuring and delivering an open data culture.

The need for and merits of the DBP and DSAP guidance are understood, however, when reviewed in conjunction with the RIIO ED-2 baseline requirements in relation to data and digitalisation it appears that the DBP and DSAP guidance are independent of these baseline requirements. Further understanding of their linkage or intention that they are not linked in any further documentation or communication would be beneficial.

Western Power Distribution (South Wales) plc, Registered in England and Wales No. 2366985

Western Power Distribution (South West) plc, Registered in England and Wales No. 2366894

Western Power Distribution (East Midlands) plc, Registered in England and Wales No. 2366923

Western Power Distribution (West Midlands) plc, Registered in England and Wales No. 3600574

Registered Office: Avonbank, Feeder Road, Bristol BS2 0TB

We agree that the delivery approach should be agile (or an appropriate alternative) over a traditional waterfall methodology. This approach also means that our delivery plan (Action Plan) will be dynamic based on our developments and the changing needs of customers and stakeholders based on industry trends and developments, rather than being able to plan a fixed five year (or other) delivery programme. Whilst a minimum update period for the Action Plan of six months provides a level of value and insight we believe a live, high level, plan shared publically and updated regularly is what will engage and provide the greatest benefit to stakeholders.

Playing our role as an electricity distributor is clear and understood in support of the transition to a modern, digitalised energy system, however, data sharing must not be expected to flow unilaterally from distribution network operators (DNO) to facilitate this transition. The full value of our data will only be realised through the advent of greater data sharing and transparency from other energy sector, and beyond, organisations such as generators, suppliers and aggregators and we would welcome further understanding on the incentives and requirements in these areas moving forwards.

In reviewing the DBP and DSAP guidance documents we believe in some instances that there would be benefit, (at this stage of data and digitalisation maturity), of taking a more deterministic approach in elements such as ensuring the Dublin Core metadata standard is the minimum acceptable standard for metadata rather than a suggestion as a possible solution, or that as a minimum the industry must agree on an acceptable initial standard. The Energy Data Taskforce (EDTF) is clear that this should be utilised whilst maturity within the industry is further developed and would therefore play an active role in supporting greater coordination between organisations in respect of datasets and descriptions.

Delivering value and benefit to the right parties is critical to ensure investment is targeted effectively. However, In relation to the first DBP principle, '*Prioritise providing benefits to the stakeholders who pay for the Products and Services as well as benefits that are in the Public Interest*' we feel it potentially excludes a number of parties such as Local Authorities, Community Energy Groups, iDNOs and future connecting customers.

We have provided specific responses to the questions posed in the Consultation in regards the DBP and DSAP below. We look forward to the opportunity to review the proposed Licence Conditions to be included as part of RIIO ED-2 focussed on the production and maintenance of the DSAP and delivering data and digitalisation products and services in line with DBP, specifically the metrics and measures to be proposed for compliance.

If you wish to discuss this further please contact Jonathan Berry, our Data and Digitalisation Manager at jberry@westernpower.co.uk

Yours sincerely



PAUL BRANSTON
Regulatory & Government Affairs Manager

Responses

Question 1

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

We believe the first DSP principle, *'Prioritise providing benefits to the stakeholders who pay for the Products and Services as well as benefits that are in the Public Interest'* would benefit from additional clarity, specifically in regards 'stakeholders who pay for the Products and Services'. We understand this to mean, in our instance, all Western Power Distribution (WPD) customers who pay DUoS, however, it could also be interpreted that it covers only specific elements such as providers of flexibility products or future customers seeking new connection services. We feel this potentially excludes a number of key parties such as Local Authorities, Community Energy Groups, IDNOs and future connecting customers. An alternative, such as *'Prioritise providing benefits that are in the Public **and Societal** Interest'* would perhaps ensure the correct areas were focussed on without being too prescriptive.

'Ensure Products and Services work towards a defined vision' DSAP Principle 2. As part of 3.4 the following is included, *'The Licensee must describe the solutions it will provide that will deliver the vision and its associated objectives, describing these in terms of a collection of Products and Services that, once they exist, wholly deliver the vision and its associated objectives.'* We believe it should be recognised that digitalisation is a fast paced and agile area and we agree that a vision can be established for Products and Services. However, it will not be possible over a period of five years, or more, for them to be completely captured and it should be accepted that the Action Plan will be regularly updated, with greater clarity towards the closer timescale for delivery and higher level detail further out.

'Take full advantage of opportunities to deliver benefits early and to iterate improvements to Products and Services' DSAP Principle 3. 3.7 includes *'The Licensee's delivery of Products and Services described in the DSAP must take advantage of opportunities to deliver benefits to consumers and the Public Interest early. This includes, where opportunities exist to do so, the Licensee delivering improvements to the Products and Services described in the DSAP incrementally throughout the development and end-to-end lifecycle of the Products and Services.'* This appears to be indicating that an Agile delivery approach, rather than Waterfall or other, should be taken as detailed in the Techniques section of the supporting Information document; if this is the case it would be useful if this was explicit as the current wording leaves it open to organisation / individual interpretation as to what early means and is not something that can be uniformly assessed.

DSAP Principle 4, *'Make it easy for stakeholders to understand the Products and Services, the status of their delivery and how to access them'* states *'The Licensee must clearly set out in the DSAP the Products and Services stakeholders can currently benefit from and provide information about how to access them'*. We do not believe it is the role of the Strategy or the Action Plan to document what Products and Services currently exist beyond where it is relevant to contextualise future activity. If there is a desire to capture a consolidated list of digitalisation focussed activity, this should be captured outside of the DSAP. We would recommend this to be captured within an online functionality to ensure it remains up to date as Products and Services are delivered.

DSAP Principle 5, *'Ensure visibility about the nature and status of actions in the Digitalisation Action Plan'* within 3.49 describes that *'The Licensee must make clear the priority of each action by setting out when it will start and when it is expected to be completed'*, however, it is our view that whilst prioritised activity is often delivered first, due to the complexity and dependency on other detail, such as data maturity as an example, it is

not always possible to make clear the priority of each action by capturing the start and end date. The question of priority is largely captured prior to the collation of the Action Plan, whereby the contents of the Action Plan is determined by priority rather than the content within.

DSAP Principle 6, '*Ensure there is shared understanding of success and performance is measured*', where the focus on success is a mix of traditional elements such as cost benefit analysis as well as examples of more advanced key performance indicators within the Techniques section. However, there appears to be no consideration for elements contained within the RIIO ED-2 SSMD as baseline requirements focussed on data and digitalisation to be delivered where success or performance of an output is currently otherwise undefined.

Question 2

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

The current Principles and their Explanations, save for comments in response to Question 1 are appropriate for the currently level of maturity around data and digitalisation in the energy industry.

Question 3

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

The Techniques and Examples are particularly useful and provide a selection of useful resources and examples of what 'good' looks like. We expect these to evolve and update as the maturity of data and digitalisation increases within the energy industry.

Open-power-system-data.org is a good example of multiple organisation and country data sharing for power system modelling data and might add to examples for DBP Principle 5 or other.

Question 4

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

Yes, the guidance and supporting information should focus on outcomes and data literacy, skills and data governance are all outputs to enable appropriate and effective outcomes to be delivered.

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?

It is understood from the current wording of the definition of Energy System Data in reference to WPD and other DNOs that all data in respect The Authority granting a licence to a person to distribution electricity. Whilst this largely covers data utilised to effectively operate our business it does not give guidance to prioritisation based on customer and stakeholder needs, which is covered elsewhere in both the DSAP and DBP detail, also in Table 2 of 1.345 in the DBP guidance based on stakeholder feedback to date. Perhaps a clearer overview would be 'all Data Assets for which an entity is a Data Custodian as a consequence of it exercising its rights and obligations under the appropriate licence of either the Electricity or Gas Act (1989 / 1986) to ensure effective and efficient operation'.

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?

The DBP and DSAP provide useful guidance and general expectations in terms of data and digitalisation, however, wholesale implementation of the DBP and DSAP would require them to be more deterministic in their approach and language to be a standard. An example of this would be moving the use of Dublin Core Metadata standard as an example to being a minimum acceptable requirement. Wider the DBP and DSAP are largely frameworks to facilitate outcomes, where a standard to enable integration of asset data between utilities, as sighted in 1.40 of the consultation, requires a specific standardised approach that is not currently captured, or would be appropriate in the DBP and DSAP.

Our view is that the DBP and DSAP, in their current format, would be supportive documents to wider Standards rather than the basis. Within the RIIO ED-2 SSMD there are a number of 'baseline requirements' that essentially act as standards moving forwards, where the DBP and DSAP will be used to support meeting those requirements.

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)?

The EESIR indicates the expectation that the presumption for new and updated equipment is that data will be captured and published in real-time to inform on the system performance, unless there is a clear reason not to do so. The DBP and DSAP support this assumption where appropriate in terms of the needs of data users and this should be the focus; the balance of sharing all data, where significant costs will be incurred, or ensuring a future proofed system and data architecture to share data prioritised and valued by respective data user types as required. A presumption to share any and all equipment data in real-time would encounter significant costs where the value in the wider energy ecosystem would not be returned.

We are supportive of the EESIR's detail around Data Standards (D.6), specifically the need to focus on interoperability of data and system performance. The need to ensure that standards reflect the requirement for appropriate industry led standardisation of data terms, glossary and vocabulary as well as focussing the data needs on that which delivers key system performance information to be used by the widest range of data users as possible is paramount. Focussing standards in these areas as well as Performance against standards, Presumed data capture and publishing, Data-driven service introduction and Privacy will facilitate a genuine data as an asset culture within the electricity industry and wider energy sector.

Question 8

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

No response.