

Data Best Practice guidance and Digitalisation Strategy and Action Plan guidance: ENSEK Response

We welcome the opportunity to respond to this consultation and note our general support to move to a standardised framework for data best practice and digitalisation.

General Feedback

Do you have any comments about the overall process of this consultation?

It is our view that question 8 ought to be a separate consultation, conducted once the Data Best Practice (DBP) and Digitalisation Strategy and Action Plan (DSAP) guidance are in their final state. As you will see from our response below, the time permitted to respond to this consultation has limited our focus to current pain-points. Additionally, we feel that the application of these guidance documents as standards to products and services within the energy sector, ought to be considered when their relevance is clear and cost-benefits can be accommodated.

Consultation Questions

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

The Use of System Charging Methodologies produced by Distribution Network Operators (DNOs) are problematic at best (see Appendix 1) and we do not believe that the principles proposed would sufficiently address the changes that we believe are required.

As such we would like Ofgem to consider dedicated, prescriptive requirements for the provision of this Data Asset. Consequently, we would suggest amendments akin to the following:

Describe Data Accurately principle:

Amendment to clause 3.4:

“3.4. The Licensee must treat the Metadata as a Data Asset itself. When providing Metadata, the Licensee must format and structure this in a machine-readable format, such as JSON⁴³, YAML⁴⁴ or XML⁴⁵. These machine-readable formats can easily have their data converted to be presented in a human readable format, such as using text editors.”

Additional explanation clause:

“Where a Data Asset and associated Metadata relate to charging data, the Licensee must ensure that the data is accurate enough for relevant parties to determine exact charges for which they would be liable.”

Make Data Assets Discoverable principle:

Additional explanation clauses:

“Where a Data Asset and associated Metadata relate to charging data, the Licensee must ensure that all potential Data Users impacted by additions or changes are proactively made aware of them.”

“Where a Data Asset and associated Metadata relate to charging data, the Licensee must ensure that these are available to all potentially impacted Data Users via a central repository that details the time and date of any change (at date item level rather than file level) and the previous version of the data so that Data Users can easily undertake a comparison.”

Ensure Data Assets are interoperable with Data Assets from other data principle:

Additional explanation clause:

“Where a Data Asset and associated Metadata relate to charging data, the Licensee must ensure that data is made available in such a way that it is reasonably easy for relevant parties to compare Data Assets with other Data Assets, to gain accurate insight as to the nature, calculation and amount (£) of charges for which the Data Users would be liable.”

Additional techniques clause and example template:

“To enable interoperability for a Data Asset and associated Metadata relating to charging data, parties can ensure that a minimum standard is agreed.”

Template: See Appendix 2

Treat all Data Assets, their associated Metadata and software scripts used to process Data Assets as Presumed Open principle:

Amendment to clause 3.21:

“Where a sensitivity associated with the Data Assets, their associated Metadata and software scripts used to process Data Assets is identified, the Licensee must take all reasonable steps to provide options that describe how these can be made available in a format or version that mitigates the risk associated with any identified sensitivity. Where the Data Asset and associated Metadata relate to charging data, the Licensee must ensure that access is provided to all relevant parties. When identifying those options the Licensee should additionally consider whether providing different stakeholders with different levels of access would mitigate any identified risk while also minimising any reduction in the utility of the Data Asset.”

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

Where it is felt more appropriate that a single principle relating to charging data is utilised, we would suggest condensing the above into something similar to the following:

X. Charging Data**Explanation**

X.1 Where a Data Asset and associated Metadata relate to charging data, the Licensee must ensure that:

- i) the data is provided in a machine-readable format, such as JSON, YAML or XML. These machine-readable formats can easily have their data converted to be presented in a human readable format, such as using text editors;
- ii) access to the data is provided to all relevant parties;
- iii) the data is available to all potentially impacted Data Users via a central repository that details the time and date of any change (at data item level rather than file level) and the previous version of the data so that Data Users can easily undertake a comparison;
- iv) the data is accurate enough for relevant parties to determine exact charges for which they would be liable;
- v) the data is made available in such a way that it is reasonably easy for relevant parties to compare Data Assets with other Data Assets, to gain accurate insight as to the nature, calculation and amount (£) of charges for which the Data Users would be liable and
- vi) all potential Data Users impacted by additions or changes to the data are proactively made aware of them

Techniques

X.2 Licensees can make use of existing industry mechanisms and governance to provide a central repository for charging data

X.3 To enable interoperability for a Data Asset and associated Metadata relating to charging data, parties can ensure that a minimum standard is agreed

Examples

X.4 The Distribution Connection and Use of System Agreement website already exercises central publications with relevant user access controls that can be broadened to in-scope all relevant parties. The Retail Energy Code is currently completing their online portal which will house central publications with relevant user access controls, and their governance allows

for chargeable services for Non-REC Parties. Ofgem's own website equally provides central publications and visibility of charging amendments may be beneficial for Ofgem.

x.5 Minimum standards in an easy to understand format and structure that enable interoperability between charging statements, methodologies and invoices might look like the template provided in Appendix 2.

Despite our focus on Distribution Network's Charging Statements, we do recognise the need for cross-sector harmonisation. As such we request that where the suggestions made would be too specific to achieve the intent of data best practice and digitalisation standards, that they be retained for consideration as licence changes, potentially as part of ongoing works around the charging review.

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?

It is our view that these guidance documents will be appropriate as data best practice and digitalisation standards where work is undertaken to ensure that they apply equally to existing Data Assets, rather than solely to new digitalisation measures that are tied to consumer benefit and Public Interest.