



Response to Ofgem's consultation on Data Best Practice Guidance and Digitalisation Strategy Action Plan Guidance

KEY POINTS

- We have no substantive comments on either the Data Best Practice Guidance or the Digitalisation Strategy Action Plan Guidance but we have noted some points of clarification below.

Responses to consultation questions

Our responses to the questions in the consultation are:

DBP and DSAP scope and content

Q1. Do you have any recommended improvements to the Principles, Explanations, Techniques or Examples?

1. The text within the DSAP Guidance and the DSAP supporting information is not completely aligned, for example paragraph 3.6 in the guidance differs from paragraph 3.18 in the supporting information document.
2. The requirement in paragraph 3.10 of the DSAP guidance and in paragraph 3.39 of the DSAP supporting information that *“the presentation of Products and Services must make it easy for stakeholders to compare them with the Product and Services included in other Licensee’s DSAPs”* may be difficult to achieve unless there is a common point of reference, such as a common terms document and/or standard use cases/personas for all DNOs.
3. The products and services description i.e. *“Products and Services: Anything that a party can offer to a market for attention, acquisition, use or consumption that could satisfy a need or want”* is very wide in scope so the guidance should confirm that it is limited to the data and digitalisation context.
4. The timings associated with further updates i.e. *“Updating Digitalisation Strategies and Action Plans for RIIO-2 Licensees;*
 - *A Digitalisation Strategy update must be published on or before March 31st 2022 and at least every 2 years after this date.*
 - *A Digitalisation Action Plan update must be published on or before June 30th 2021 and at least every 6 months after this date (i.e. each subsequent 31st December and 30th June)”*

will require three updates to the DSAP during a 12 month period. Consequently, the updates to the digitalisation strategy should be aligned with those for the action plan.

5. Paragraphs 3.1 and 3.2 of the DSAP guidance could be a very wide scope so the guidance should confirm that they are limited to the data and digitalisation context.

Q2. Are there any other Principles and Explanations you believe should be included?

6. No

Q3. Are there any additional Techniques or Examples you recommend we include?

7. No, the techniques and examples give comprehensive coverage. However, it may be beneficial for all DNOs to have a set of standard personas that they could add to, as noted in our response to question 2.

Q4. Do you agree with our treatment of data literacy and skills and of data governance as pre-requisites to compliance?

8. Yes, we agree with the treatment but to be fully compliant for the start of ED2 appears to be binary. There should be some provision for maturity levels to be worked through.

Q5. 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?

9. We are concerned about the wide definition of energy system when combined with the licence conditions on data best practice compliance and what that means for transient data and believe, therefore, that the definition should be subject to reasonable endeavours.

Establishing our data and digitalisation standards and our upcoming data and digital monopolies review

Q6. 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?

10. We are comfortable with the DBP guidance and the DSAP guidance being used as data and digitalisation standards. We will apply the DSAP and DBP guidance to our data and digitalisation portfolio of initiatives.

Q7. 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)?

11. We agree that increased capture and publishing of data could have significant implications and could increase the risks relating to cybersecurity and customer privacy. This appears to be covered comprehensively in the DBP Supporting Information but less so in the DSAP Supporting Information. Further clarification in the DSAP Supporting Information would, therefore, be beneficial.

Q8. Which gas and/or electricity market products/services (existing or planned) should be included in our upcoming data and digital monopolies review?

12. Given the rate and nature of change facing the energy industry, we expect this to be a constantly evolving picture. We would be keen to work with Ofgem to shape the focus of the review.