



Greg Johnston
Ofgem
10 South Colonnade
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E14 4PU

Date
24th June 2021
Contact / Extension
0141 614 1918

Dear Greg

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

SP Energy Networks (SPEN) owns and operates the electricity distribution networks in the Central Belt and South of Scotland (SP Distribution) serving 2 million customers as well as (SP Manweb) which serves 1.5 million customers in Merseyside and North Wales. We also own and maintain the electricity transmission network in the Central Belt and South of Scotland (SP Transmission).

We welcome the opportunity to respond to this consultation. Whilst Ofgem's recommendations are reasoned, some will be challenging to fulfil all immediately. It should therefore be recognised by Ofgem that the Licensees' Digitalisation Strategies and Action Plans will be perpetually evolving, and that compliance with the Data Best Practice Guidance will require the establishment of new capabilities, processes and systems that will require time to implement.

Our full response to the consultation questions can be found in the appendix to this document. Should you have any queries relating to this response, please do not hesitate to get in touch.

Our comments and this letter are submitted to Ofgem entirely without prejudice to SPEN's rights, including those under the Electricity Act 1989, and SP Transmission's ongoing appeal of the RIIO-T2 licence modifications to the Competition and Markets Authority. All of SPEN's rights are reserved.

Yours sincerely

Marissa McCarroll
Project Sponsor

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SP Manweb plc, Registered Office: 3 Prenton Way, Prenton, CH43 3ET Registered in England and Wales No. 2366937 Vat No. GB659 3720 08
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APPENDIX: CONSULTATION QUESTIONS

GENERAL QUESTIONS

Question	Response
1. Do you have any comments about the overall process of this consultation?	The deadline for submission of feedback on the consultation falls within the same window for submission of RIIO-ED2 draft Business Plans. This has proved particularly challenging in terms of resourcing.
2. Do you have any comments about its tone and content?	Content of guidance was clearly expressed
3. Was it easy to read and understand? Or could it have been better written?	The document was clear to read and understand.
5. Did it make reasoned recommendations for improvement?	The recommendations were reasoned, however will be challenging, in some cases, to fulfil all immediately; scope, people and culture are the 3 key challenges. In terms of scope we see this as a journey. Ideally it would be good to see a prioritisation or proposed roadmap of the recommendations. SPEN will continue to work with other network organisations through the ENA's Data and Digitalisation Steering Group to set the agenda. For people and culture, while we will endeavor to bring our workforce with us on this journey, this will pose a number of challenges. It should therefore be recognised that the Licensees' Digitalisation Strategies and Action Plans will be perpetually evolving.

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6. Any further comments?

The Techniques tables are of particular assistance, providing a wealth of information on sources of techniques.

For stakeholder feedback and inclusion within the Licensees' DSAP, it would be beneficial to provide a common format for this. It is understood that this may happen in the future, however a consistent approach across Licensees from the outset would be welcomed.

Within the DBP guidelines, it is generally felt that this is a big ask for Licensees to publish all data. Therefore, there should be a priority list of datasets that should be focused on. It is an unrealistic standard to expect all data to be handled in this way from the outset.

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DBP AND DSAP SCOPE AND CONTENT

Question	Response
Question 1: Do you have any recommended improvements to the Principles, Explanations, Techniques or Examples?	<p>The guidance will be challenging, in some cases, to fulfil all immediately; scope, people and culture are the 3 key challenges. In terms of scope we see this as a journey. Ideally it would be good to see a prioritisation or proposed roadmap of the recommendations. SPEN will continue to work with other network organisations through the ENA's Data and Digitalisation Steering Group to set the agenda. For people and culture, while we will endeavor to bring our workforce with us on this journey, this will pose a number of challenges. It should therefore be recognised that the Licensees' Digitalisation Strategies and Action Plans will be perpetually evolving.</p> <p><u>DSAP</u></p> <p>Principle 1, Explanation 3.1: It would be more valuable for the Licensee to identify typical <i>groups</i> of stakeholders of its Products and Services than list each one individually e.g. landowners, consumers, aggregators, connections customers, digitally excluded, digitally disengaged etc. There will also be a number of stakeholders yet known to Licensees e.g. recipients of open data.</p> <p>Principle 2, Explanation 3.17: It would be useful for all <i>enabling</i> Products and Services to be included within the DSAP, even when stakeholders have not expressed a need, as these may be of interest to a wider audience.</p> <p>Principle 4, Explanation 3.43: It is important to note that whilst the creation of interactive, drill-down style roadmaps is undoubtedly the way forward, especially in explaining and illustrating Licensee's plans for digitalisation and data, there is still a need for traditional publications to be made available for</p>

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	<p>the digitally excluded/disengaged stakeholders and customers.</p> <p><u>DBP</u> A section should be included on what types of data should be published and what is a reasonable justification for not publishing data.</p> <p>It would be useful to have dates that should be used as a benchmark.</p> <p>It would also be useful to have a demonstration on tangible progress due to the challenges listed above. The Digitalisation and Data strategies and associated deliveries will be an evolving piece, and a critical success factor is to listen to our customers and stakeholders and use their feedback to shape our deliverables.</p>
Question 2: Are there any other Principles and Explanations you believe should be included?	Principles cover all areas required which are helpful to internal discussions/planning. Definitions are also beneficial.
Question 3: Are there any additional Techniques or Examples you recommend we include?	<p><u>DBP</u> We suggest a focus on 'Open Data' - differentiation between open (public) data and 'Open data' activities.</p>
Question 4: Do you agree with our treatment of data literacy and skills and of data governance as pre-requisites to compliance?	<p><u>DBP</u> Generally, we agree that data literacy, skills and governance are pre-requisites.</p>
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?	No we are happy with the current definition

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

Question	Response
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?	<p>We agree this should be a principles based approach</p> <p>A prioritised approach to data should be an open, value-based approach</p> <p>We believe it could be beneficial to potentially have an industry roadmap (including consistent format e.g. CIM and guidelines on datasets that would be required/expected).</p> <p>Within the DBP guidelines, it is generally felt that this is a big ask for Licensees to publish all data. Therefore, there should be a priority list of datasets that should be focused on. It is an unrealistic standard to expect all data to be handled in this way from the outset.</p>

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