Hi

I've included a couple of specific responses to your ongoing consultation at the bottom of the email.

We're a small startup with significant experience in other sectors. We think the work on data standards is really important.

From our experience, public data in the energy system is not properly open. For example, we're a small startup company with a consumer product. Our consumers want us to talk to them in pounds and pence so we need to get their tariff details to do this. Even though the utility's are required to publish their tariffs, they all do it in different formats in different places. To build a comprehensive, high quality tariff dataset is a large undertaking that involves integrating with 70+ supplier formats. This is impossible for a company like ours. So instead we have to pay a large amount of money to a data provider to access this 'public' tariff data.

The approach of setting principles does have drawbacks. It makes it likely that each company governed by the code will create bespoke products leading to Data Users having to build bespoke integrations with each. At the network level the overhead from these bespoke integrations will be limited as there are only a small number of DNOs and no new entrants (but to be clear, the impact could still be large). If this approach is rolled out to the utility space with 70+ utilities and significant new entrants each year, the cost of bespoke integrations will be large and we envisage data intermediaries entering the space but with signifiant costs attached. For us this would be a significant market failure as the data at this point is not open as we'd be paying a large price to access it.

Question 1: Do you have any recommended improvements to the Principles, Explanations, Techniques or Examples?
Extend the specification of a 'Data User' to explicitly include software as a User. With Data User considered to be a person, poorly structure data sets in non-optimal formats (e.g. large spreadsheets across multiple tabs in proprietary software) may satisfy the conditions. By specifying that simple software can parse the data it implicitly requires data to be well structured in open formats.

'Sharing of software scripts' would benefit from enforcing that the user can actually run the script. E.g. Scripts must include a specification for an environment within which the script will successfully run. This ensures that Data users can actually run the code themselves and there are no hidden dependencies on proprietary libraries of external/internal dependencies.

Question 2: Are there any other Principles and Explanations you believe should be included?
A Principle of Continuity of Service should be introduced. This is different to maintenance: continuity of service includes consistency across time so a data user's code or process will continue to work as data is updated. Formats will not change without warning. Data will be updated and not go stale. The location of data will be consistent. This enables businesses to confidently build out processes and automation based on the data.

Thanks
Steve

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