Appendix 6 - Smart Optimisation Output

We firmly believe that Ofgem should not finalise the Smart Optimisation Output Guidance document until Ofgem and DNOs have been able work together to ensure the interface requirements are clearly articulated and understood by all. Once this process is complete, a realistic set of deliverables and deadlines can be set reflecting interactions with other working groups such as the Data and Digitalisation working groups, the Open Networks working groups and publications such as the DSAP.

Further detail:

The System Visualisation Interface in particular is described as 'a section of the DNOs website and open data portal that provides access to a package of forward-looking, open and accessible, digital network tools' and this should be accessible to stakeholders by 1st October 2023 with further developments in place by 1st May 2024. Further, the guidance prescribes that information held on the System Visualisation interface should be determined collectively by DNOs and presented in a format and time horizon to be determined collectively by DNOs. To provide context to our concerns, this ask should be compared to the current work by all DNOs to standardise the LTDS which is a process that has taken twelve months so far and only relates to one set of data and information. The SOO guidance prescribes several data sets which must be standardised within a very short time period. Timescales are further challenged by the guidance prescribing that the data is to be made available through an Application Programming Interface (API) that is common across all DNOs, and we do not believe such commonality can be achieved in these timescales.

Notwithstanding our concerns on timelines and our request that the SOO guidance is not finalised until DNOs and Ofgem can set out the deliverables in a way that allows a realistic deadline to be set, we have specific drafting concerns which we believe could be addressed now:

- Para 1.12 In respect of both Parts 1 and 2, the licensee must collaborate with local stakeholders, to ensure that the SOO reflects the needs of customers and that work undertaken by licensees during RIIO-ED2, relevant to the future development of the wider energy system (eg for heat, natural gas, hydrogen, transport and storage), is accessible to, and informed by, stakeholders.
    - The words in green set out a particularly broad obligation (with a must) and could arguably be construed to be ALL work undertaken by licensees. This should be more tightly constrained as follows: In respect of both Parts 1 and 2, the licensee must use reasonable endeavours to collaborate with local stakeholders, to ensure that the SOO reflects the needs of customers. and that Work undertaken by licensees during RIIO-ED2, in relation to the SOO relevant to the future development of the wider energy system (eg for heat, natural gas, hydrogen, transport and storage), should be is accessible to, and informed by, stakeholders.
- Para 2.2 DNOs must participate fully in the co-development of local area energy plans, net zero roadmaps and other strategies and cross-utility solutions, led by local and regional authorities and supported by the communities they serve, that will enable least cost decarbonisation pathways for power, heat and transport, where the involvement of the licensee is material in the successful planning and delivery of such strategies and solutions.
    - It is not the role of DNOs to develop or co-develop these plans and the extent to which we are able to be involved in the planning process will vary depending on the local or regional authority in question. Our role is to support and the drafting should be updated as follows: DNOs must support the participate fully in the co-development of local area energy plans
- Para 3.1.1 Provide a representation of the DNO's existing network assets and associated constraints using both static and dynamic data. Such data should include the type, capacity,

and location of assets and the location and specific nature of constraints, on all parts of the distribution network, at all voltage levels. Heat maps and raw data must be made available through an Application Programming Interface (API) that is common across all DNOs.

- o The word "known" should be included before "constraints"