



Making a positive difference
for energy consumers

To holders of an Electricity
Transmission Licence, Electricity
Distribution Licence or a Gas
Transporter Licence and other
interested parties

Direct Dial: 0207 901 7345

Email: Daniel.Kyei@ofgem.gov.uk

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Decision on amendments to Data Assurance Guidance (DAG) submissions for Electricity and Gas Transmission, Electricity and Gas Distribution and Electricity System Operator Licensees

Introduction

On 17 February 2022, we issued a consultation¹ seeking views on proposed amendments to the data assurance requirements for electricity distribution, electricity transmission and gas transporter licensees. The proposed changes were set out in a mark-up of the Data Assurance Guidance (DAG) and associated reporting templates. This letter sets out our decision to modify the DAG, following our consideration of the responses received to that consultation.

Consultation Responses

We received responses to the consultation from licensees to which these data assurance requirements will apply. We have summarised respondents' substantive comments and issues raised, along with our responses to them, in the Appendix to this letter. In addition, where respondents identified DAG submission list updates, typographical or other minor errors, we have made the appropriate corrections in the relevant documents, but these are not included in the Appendix.

¹[Consultation on proposed amendments to Data Assurance Guidance \(DAG\) submissions for Electricity and Gas Transmission, Electricity and Gas Distribution and Electricity System Operator Licensees | Ofgem](#)

Direction to amend the DAG

We have carefully considered the consultation responses in reaching our final decision. The background to our proposals and our decision are set out in the consultation documents published on 17 February 2022 and in the Appendix respectively.

This letter serves as a direction to modify the DAG under paragraph 7 of Standard Condition B23 of the Electricity Transmission Licence, paragraph 7 of Standard Special Condition A55 of the Gas Transporter Licence and paragraph 10 of Standard Condition 45 of the Electricity Distribution Licence. This decision will take effect on and from today, 24 March 2023.

As a result of this direction, the DAG consists of the documents listed below, each of which has legal effect as if it were a condition of the licence:

1. DAG Guidance Document (version 2.2)
2. Risk Assessment Template (version 2.2)
3. Network Data Assurance Report (NetDAR) Template (version 2.2)
4. Exceptional Submission Assurance Template (version 2.2)

In accordance with paragraph 8 of Standard Condition B23 of the Electricity Transmission Licence, paragraph 8 of Standard Special Condition A55 of the Gas Transporter Licence and paragraph 11 of Standard Condition 45 of the Electricity Distribution Licence, we are publishing the above documents alongside this decision and direct for them to be amended as shown.

Yours faithfully,

Jourdan Edwards
Interim Deputy Director
Onshore Networks
Duly authorised on behalf of the Authority

Appendix – Summary of consultation responses

Document/Subject	Feedback Received	Ofgem Response
Risk Assessment Template (Electricity Distribution)	<p>The Risk Assessment Template includes a requirement to risk score Standard Licence Conditions (SLC) 46 - Strategic Overview.</p> <p>We believe this is the Strategic Commentary and seek clarity on the title of this submission to ensure the correct one is assessed.</p>	<p>This refers to the Strategic Commentary submitted with the Regulatory Reporting Pack (RRP) on an annual basis.</p> <p>The Risk Assessment Template has been updated to Strategic Commentary to provide greater clarity.</p>
DAG Guidance Document	<p>The Guidance Document needs considerable work in respect of formatting as headings overlay text and are interspersed with text in numerous places.</p>	<p>The Guidance Document has been updated accordingly.</p>
NetDAR	<p>The NetDAR template v2.2 does not include the section which covered “the purpose of the document, its scope and any assumptions” which was in v1.1.</p> <p>This provided a useful section to introduce the reader to the licensee structure for the company. We suggest this is added back in.</p>	<p>We will include this proposal as part of our consultation for March 2024 DAG submissions and if accepted will be added back.</p>
DAG Guidance Document	<p>We propose some further clarification regarding the requirements set out in the DAG Guidance Document Appendix 4 i.e. NetDAR Pre-submission Guidance Notes.</p> <p>It would be beneficial if Ofgem could indicate which sections of the NetDAR they expect the information to be reflected in.</p>	<p>As stated in the DAG Guidance Document the Appendix 4 is for guidance only.</p> <p>Our expectation is for licensees to provide relevant information in any pertinent section in the NetDAR.</p>
NetDAR	<p>We note you refer to ‘material changes to the Data Architecture or</p>	<p>A material change is where the change undertaken</p>

	<p>organisational Data processes' in the NetDAR report however the term 'material changes' is not defined. It would be beneficial to clarify this to ensure reporting content is appropriate.</p>	<p>alters our current understanding and associated risks we have on Licensees Data Architecture or organisational Data processes. The above definition has been included in DAG Guidance Document- Appendix 2 Definitions.</p>
DAG consultation period	<p>We would request your consideration of moving the publication of future DAG consultations to December or January. This change will mean that companies receive the final updated versions of the data risk assessment and NetDAR templates with sufficient time for completion by 31st March and will reduce the administrative burden as we prepare for the upcoming regulatory reporting period.</p>	<p>We agree with the request. In August 2023, we will circulate the timeline plan for March 2024 DAG submission. This will incorporate your proposed publication of the DAG consultation by end of January 2024. We plan to main the above timeline in future years.</p>