

Liam Bennett
10 South Colonnade
Canary Wharf
London
E14 4PU

13 April 2023

Dear Liam,

SSEN Transmission response to Consultation on updates to Data Best Practice Guidance and Digitalisation Strategy and Action Plan Guidance.

This response is prepared on behalf of Scottish Hydro Electric Transmission Plc (SSEN Transmission), part of the SSE Group, responsible for the electricity transmission network in the north of Scotland.

We welcome the opportunity to respond to the consultation on updates to Data Best Practice (DBP) Guidance and Digitalisation Strategy and Action Plan (DSAP) Guidance. We recognise the importance of these changes to reflect the developments in the digital energy sector and to contribute to the operation of an agile regulatory environment.

Our response to the relevant consultation questions is set out in Appendix 1, however, we would highlight the following key points:

Changes to the design approach of Data Best Practice Guidance

- We appreciate the addition of intended outcomes for each principle and largely agree with the basis of each addition. However, we would welcome further clarity regarding several complexities as detailed below in our response to Question 2.

Data Best Practice Guidance and Digitalisation Strategy and Action Plan Guidance scope and content

- Whilst we recognise the value of Metadata standards, we would highlight apparent challenges in the suitability of Dublin Core. Furthermore, we would recommend that several key metrics to Metadata elements are agreed and standardised across industry.

We look forward to further engagement in this area, and should you wish to discuss any aspect of this response please do not hesitate to get in touch.

Yours sincerely,

Emma Cant
Regulation Analyst
SSEN Transmission

Appendix 1 - Response to Consultation Questions

1. Do you agree with our proposal to implement a structural change to DBP Guidance, introducing intended outcomes for each principle? If not, how do you suggest we could clarify the aim of each principle.

We broadly agree that introducing intended outcomes for each principle provides more specific results to be defined and measured. Furthermore, we appreciate that clarifying the aim of each principle provides greater transparency and focus to licensees. This transparency has the potential to prevent regret spend through ensuring harmonisation within the energy industry. However, the outcomes should endeavour to be clear, achievable, technically sound and represent the most efficient solutions which achieve stakeholder requirements at the least cost for the consumer. We would therefore recommend revisions to the wording of certain intended outcomes to clarify the aims of each principle, as detailed in our response to Question 2.

2. What are your views on the proposed wording of our intended outcomes for each principle in DBP Guidance?

We support the proposed wording of the intended outcomes for each principle in DBP Guidance with the following exceptions:

Principle 1 - The proposed wording for the intended outcome of Principle 1 provides a very clear outcome. However, we would note that the language in Paragraph 3.1 refers to terms that align with Data Privacy regulations and are subsequently less applicable to data management best practice. We would recommend that the terms 'Data Subjects', 'Data Controllers' and 'Data Processors' be changed to 'Data Owners', 'Data Stewards' and 'Data Consumers'. This would align more closely with the language currently employed in data management standards.

Principle 2 - We agree with the basis of the proposed intended outcome of Principle 2, however we would welcome further clarity in the reference to "Metadata". We recommend that this principle be revised to clearly differentiate between a common glossary of terms, achieved through industry harmonisation, and the need for a Metadata standard. In defining the latter, the need for a Metadata standard is more applicable to Principle 3.

Principle 3 - We recognise the basis of the proposed intended outcome of Principle 3 and agree that defining the use of a Metadata standard is beneficial in accelerating progress. However, we would caution the use of the Dublin Core Metadata Standard as we are aware of challenges in data cataloguing and open data portal technology employed by several other network companies. We discuss this in further detail in our response to Question 3.

We would also highlight the need to develop standards that sit below the use of Dublin Core to ensure standardisation across the use of terms and User experience.

3. What are your views on our proposal to require the use of Dublin Core as the Metadata standard for companies obligated under DBP Guidance?

We appreciate the proposal to implement a Metadata standard across the industry and broadly support the proposal to require the use of Dublin Core as the Metadata standard for obligated licensees. However, through engagement with our peers across industry, who are further progressed in terms of launching an Open Data Portal, we are aware that Dublin Core is not compatible with prevalent open data portal and cataloguing software providers.

4. If you do not agree with this proposal, are there alternative Metadata standards that should be utilised by licensees instead?

Owing to the compatibility concerns raised in our response to Question 3, it may be preferable that key metrics are agreed and standardised across industry, as opposed to subscribing to a particular standard.

We do however welcome Ofgem's consideration of alternative Metadata standards. For spatial datasets, we would highlight that Inspire is a possible alternative more compatible with spatial data.

5. If you are a licensee required to comply with DBP Guidance, can you provide a timescale for the implementation of the proposal to adopt Dublin Core as your Metadata standard?

We would welcome further clarity on whether the timescale referenced in Question 5 relates to the adoption or the application of the Dublin Core Metadata Standard. If based on the application of the standard, we would ask Ofgem to clarify if that is based on published data or the full set of Data Assets across our organisation.

Despite the concerns raised in our response to Question 3, we note that it is feasible for us to comply with the use of Dublin Core as a Metadata standard. The adoption and initial application of the standard will be defined in advance of the creation of our Open Data Portal which is planned for completion Q4 2023/24. This information will be published and maintained within our Digital Strategy and Action Plan.

6. What are your views on our proposal to require the use of the Creative Commons Attribution Licence or the Open Government Licence as the standard open data licence for companies obligated under DBP Guidance?

We have no initial preference between the two open data licences referenced, however we have engaged with other network companies to obtain their views and look to align our approach in a collective and collaborative manner to accommodate the best interests of the end user.

8. If you are a licensee required to comply with DBP Guidance, can you provide a timescale for the implementation of the proposal to adopt the Creative Commons Attribution Licence or the Open Government Licence as your open data licence?

Our timescale to adopt the Creative Commons Attribution Licence or the Open Government Licence will be defined in line with the creation of our Open Data Portal, which is planned for completion Q4 2023/24. This information will be published and maintained within our Digital Strategy and Action Plan.

9. What are your views on our proposal to require licensees to create and publish a Data Catalogue of their Data Assets?

We support the proposal to create and publish a Data Catalogue to increase the discoverability of our Data Assets. However, further consideration should be given from the perspective of value and prioritisation concerning the resource intensive process of cataloguing the entirety of our Data Assets.