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ElectraLink's response to Ofgem's Consultation on Updates to DBP & DSAP Guidance



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To Liam and the Energy Systems Data Regulation Team,

ElectraLink's response to Ofgem's Consultation on Updates to DBP and DSAP Guidance

ElectraLink welcomes the opportunity to respond to Ofgem's Consultation on Updates to DBP and DSAP Guidance. ElectraLink operates at the heart of the UK energy market with unique insights into the challenges and opportunities the industry faces. For over 25 years, ElectraLink has supported the evolution of the UK energy market with the consistent and reliable delivery of the Data Transfer Service (DTS). This experience at the heart of data transfer in the UK energy market allows us a unique insight on the digitalisation of the energy industry, and how data best practice may impact on the industry.

ElectraLink believes that these principles are essential to move the energy industry into a smarter, data-driven direction and the approach outlined in the consultation will become a vital component of a future energy system that is smarter, cheaper for end consumers and a vital step towards hitting net-zero targets in the UK. For a full rundown of our views on Data Best Practice, as well as our steps towards compliance, please see our response to the 2022 call for input.

ElectraLink strongly agrees with the proposal to treat both aggregated smart meter consumption and flexibility market operation data as Energy System Data and hence "presumed open". We believe that this will unlock significant value for industry, as well as speeding up progress to net-zero and lowering customer bills. Improved data transparency will provide network companies and market participants the ability to develop and provide additional new flexibility services that mitigates the need for network reinforcement and allows new renewable connections. ElectraLink will proactively assist the industry to achieve the goal of creating an interoperable methodology, by using our experience with the DTS and DCUSA, the creation of a Single Energy Market Data Catalogue and project Flexr, alongside our extensive knowledge and experience in managing and developing data trusts that unlock the benefits of datasets whilst managing the associated risks.

We would be delighted to discuss our response to individual questions and wider views on digitalisation and data best in more detail down below. Please contact paul.linnane@electralink.co.uk for further information.

Yours sincerely,



Paul Linnane
Chief Data Officer

Question 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?

ElectraLink agrees with the proposal to implement this structural change, as we believe that more clarity on the goals and meanings of the principles can only be positive for their implementation and understanding from within the industry, allowing a variety of industry parties to work towards the common goals that are exemplified within the guidance.

Question 2

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

ElectraLink believes that the proposed wording of the intended outcomes for each principle in the DBP Guidance are appropriate and clear. The guidance, with proactive industry participation and data leaders, such as ElectraLink, will allow industry parties to share and surface more data, whilst using similar data standards, allowing for the unlocking of significant value for the energy system and participants.

Question 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?

As stated in our response to Ofgem's 2022 Call for Input on the DBP Principles, ElectraLink believes that industry parties should consider the benefits to consumers of enacting these principles before applying them to every area of their business and all datasets. ElectraLink agrees that technical standards can be applied across all segments of the energy market. However, it is important that a technical standard is applied according to the relative benefit it brings.

Mandating certain structures can delay innovation and may not always be necessary. There will be agreed upon standards already established in industry and, where this data is universally used, then standards will reduce unnecessary transaction costs. Where there is value for standardisation, if it is universally applicable across industry, this will become a 'standard', or a new bespoke 'product' that aims for standardisation, where it adds the most value. However, where the data is not universal, provided that there are glossaries / metadata related to datasets, then industry should be able to make use of the data; therefore, standards may not be needed.

In this case, ElectraLink believes that there is clear value in the standardisation that Dublin Core would bring for the licenced parties who must mandatorily follow the principles, helping data from across these licensees to become more interoperable, which will be essential to unlock the value that is stored there. As such, we are in favour of this proposal.

Question 4

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

ElectraLink believes that Dublin Core is an effective metadata standard to use for this purpose, as described in our response to question 3. We use this standard across several of our products at the moment, including EMPRIS, which helps provide data directly to Ofgem and the Government.

EMPRIS's innovative technology makes energy data more visible for the benefit of all market participants and consumers. Users are empowered with secure and instant access to data about energy production and consumption through self-serve analytics to improve the understanding and outcomes of policy, reduce the burden of reporting on the industry, and drive the energy market transition.

ElectraLink believes that while Dublin Core should be used at this time, we believe that ongoing best practice and research should be undertaken to study other metadata standards in the future that may be comprehensive or more valuable for a different sort of data that may be regulated in the future. As such, we would ask Ofgem to consider in the future if a different metadata standard may be more effective if a different data sharing initiative is pushed, as not to foreclose significant opportunities. This will help maximise the benefits to industry, utilising a culture of continuous improvement and best practice.

Question 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?

ElectraLink is not a licensee required to comply with DBP Guidance – and utilises a number of different metadata standards for different purposes across our products and services. We have already adopted Dublin Core for EMPRIS – and are looking to ensure that we support licensees where possible to help them achieve compliance.

Question 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?

As before stated in question 3, ElectraLink believes that there must be sufficient value for technical standards to be applied across licensees and participants, weighed against the costs of potentially foreclosing data markets.

In this case, ElectraLink is strongly behind the introduction of a specific licence for open data for companies obligated under DBP guidance, this will dramatically increase interoperability of critical

mature data sets. We agree that this will allow for simplified sharing, distribution, and re-use of an open Data Asset, while also providing needed clarity on how the asset can be used. This will allow for the combination of assets across licensees and help implement rapid changes needed to bring about net-zero. This is demonstrated in the ElectraLink proposal to the Energy Innovation Council to provide a data curation role across the industry that would work alongside industry participants to ensure all parties meet the standards are achieved and maintained.

ElectraLink approves of Ofgem's intention to leave open the idea of developing a specific energy industry open data licence, as this may be something that is essential in the long run to develop the data sharing needed for the more efficient running of the system, helping hit net-zero targets and reduce costs for customers.

Question 7

If you do not agree with this proposal, can you suggest alternative open data licences to be utilised as a common open data licence?

ElectraLink agrees with the 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.

Question 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?

While ElectraLink is not a licensee required to comply with the guidance, and does not have the significant data assets that would be best fitted through the use of the CCA or OG Licence for open data as other industry participants – ElectraLink is working hard to ensure that we make our data as open as possible, with appropriate data triage where possible.

ElectraLink uses a Data Trust style of governance when managing our data as part of our management of the DTS, a structured, mature governance arrangement for data sharing, whereby we act as a steward over the data for industry and consider a spectrum of stakeholder concerns when making decisions over access and maintenance of data. This selection of stakeholders is essential for any data trust that would manage de-personalised smart meter data, as it will ensure that the correct use cases for this data are progressed. Potential groups of stakeholders that should be included could be legal experts, consumer advocate groups such as citizens advice, as well as security experts and the various companies that make up the data sharing landscape. The DTS User Group is made up of a variety of energy firms, including suppliers, DNOs, a DC/DA and others, including a final round of Ofgem oversight if required, a varied mix of stakeholders to ensure that the data that is shared across the DTS is only used for correct purposes.

Question 9

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

ElectraLink strongly agrees with the proposal to require licensees to create and publish a data catalogue, as this will help with discoverability and visibility of any data that is made available. We believe that this couples well with the requirement for a specific open data licence, as this will create a large set of interoperable and visible data. We believe that together, these two principles make a strong step towards unlocking valuable energy system data.

ElectraLink currently maintains a list of our data assets through our Single Energy Market Data Catalogue (SEMDC). This outlines datasets that flow across the DTS and other datahubs, and we have high-level product pages and databases on the website that outline key datasets and products that ElectraLink manages for industry or individual customers.

Bespoke products are dealt with on a bilateral basis, so we are taking actions to move to a more comprehensive data asset log to consider all data products that we create for industry. We believe that these actions will help align us with this new principle.

Question 10

Do you agree with our proposed position on treating aggregated smart meter consumption data as Energy System Data?

ElectraLink strongly agrees with both proposals on treating both aggregated smart meter consumption and flexibility market operation data as Energy System Data and hence “presumed open”.

ElectraLink strongly believes that this data is important for improving the efficiency of the energy market & hitting net-zero targets, due to the value of these types of data in determining where energy data is situated and for the proper management of the grid as it becomes a smarter and more granular system. As such we strongly support Ofgem's suggestion to designate this data as Energy System Data and hence presumed open.

We believe that when considering de-personalisation of data, the governance of this data is essential to ensure that all stakeholders in the process feel that their data is being accessed fairly and with no opportunities for misuse – as well as to maximise the potential value of de-personalising data. ElectraLink believes that to truly unlock the benefits of de-personalised, they must be married with effective data governance, combatting concerns around which parties can access data with respect to privacy and data ownership.

ElectraLink adopts a Data Trust governance model when managing our data as part of our management of the DTS, a structured, mature governance arrangement for data sharing, whereby we act as a steward over the data for industry and consider a spectrum of stakeholder concerns when making decisions over access and maintenance of data. This selection of stakeholders is essential for any data trust that would manage de-personalised smart meter data, as it will ensure that the correct use cases for this data are progressed. Potential groups of stakeholders that should

be included could be legal experts, consumer advocate groups such as citizens advice, as well as security experts and the various companies that make up the data sharing landscape. The DTS User Group is made up of a variety of energy firms, including suppliers, DNOs, a DC/DA and others, including a final round of Ofgem oversight if required, a varied mix of stakeholders to ensure that the data that is shared across the DTS is only used for correct purposes.

This governance structure reduces data risks (the wrong people accessing the data) and ensures independence and competitiveness, as the industry govern how industry data can be used. The industry, via the DTS User Group and Ofgem, retain oversight of the DTSA and therefore, have direct visibility of any EMDH performance, service or governance issues relating to data sharing. The rules of data sharing can be updated as appropriate and agreed by the industry, and this mechanism has been used to provide data to a range of market actors. The rules of data sharing under the DTSA are relatively simple:

1. If it is 'your' data, i.e. you sent it across the EMDH or the data is about you (the consumer), you can access it subject to a Data Analysis Service (DAS) Contract.
2. If it is aggregated to a level where the consumer or an individual DTS User cannot be identified, it can be accessed subject to a DAS contract.
3. Individual data can be provided under the legitimate purpose provision within GDPR. Any legitimate purpose use case is subject to user group approval.

ElectraLink believes that if similar governance principles are followed in the surfacing of this data, then massive value will be unlocked for the system.

Question 11

What are your views on our position that this Data Asset should be published in a non-interoperable fashion by 14 October 2023, if the appropriate security controls are in place?

ElectraLink believes that the timelines are ambitious, but also that data should be surfaced as soon as possible, as long as the market participants who need to do so have time to prepare adequately to ensure that the risks are assessed, mitigated and data security is maintained. We however believe that the non-interoperable versions of this data will not be nearly as valuable as the interoperable methodology-backed versions of the data sets, and that focus on making that available is far more important in terms of reaching net-zero and helping reduce costs to customers.

Question 12

What are your views on our proposal that DNOs collectively determine an interoperable methodology by 28 February 2024, for publishing aggregated smart meter consumption data?

ElectraLink strongly agrees that an interoperable methodology for publishing this data is a necessary move that will greatly increase the value of this data, allowing a variety of market participants to use and derive meaning from a wide set of data. ElectraLink believes that a strongly designed and well governed interoperable methodology could significantly improve the data readiness of the energy industry to meet net-zero targets, and could lead to a variety of new services and business models across the value chain that are not even conceived of at current.

Our expertise and position in the industry mean we are well placed to support the DNOs to achieve this goal. For over 25 years, ElectraLink has supported the evolution of the UK energy market with the consistent and reliable delivery of the Data Transfer Service (DTS). From its inception in 1998, the DTS has supported competition and growth in the market through flexible, secure, and trusted data transfer.

The DTS underpins the competitive UK electricity, gas, and water markets, enabling participants to work together to exchange information about their customers. The DTS provides a managed file transfer service that allows market participants to share data efficiently and securely to perform their roles in the market. This information interchange facilitates a wide range of business-critical processes including change of supplier, metering, and settlement.

Alongside the DTS, ElectraLink has been working on the DESNZ Automatic Asset Register feasibility project. This work included collaborating with a wide variety of stakeholders to share their data on a combined platform and was well received as a practical solution to solve many of the industry's problems around identifying the location of assets that could deliver flexibility.

Alongside this regulated data transfer, ElectraLink has extensive experience sharing data on demand and creating services which maximise value across the energy industry. Examples of this include our EMRPIS platform as detailed in our response to question 1, and our APIs which aid a variety of market participants, creating a more efficient and cost-effective energy system, while boosting competition.

We believe that our experiences with data transfer and sharing make us an invaluable partner in sharing and creating this interoperable methodology, along with our place in the industry as a joint subsidiary of the DNOs. With the data trust model of governance (please see Question 10 for our full views), we believe that we can create a truly value unlocking service for the DNOs and industry.

Question 13

What are your views on our proposal that licensees treat Data Assets associated with flexibility market operation as Presumed Open?

ElectraLink strongly agrees with the proposal that licensees treat data assets associated with flexibility market operation as presumed open. Please see our response to Question 10 for our full rationale.

Question 14

Do you foresee any specific barriers to treating Data Assets associated with flexibility market operation as Open Data?

ElectraLink does not foresee any specific barriers to treating data assets associated with flexibility market operations as Open Data.