

Date
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Dear Liam,

Consultation on updates to Data Best Practice Guidance and Digitalisation Strategy and Action Plan Guidance

I am writing in response to your consultation, published on 28 February 2023, regarding updates to the Data Best Practice (DBP) guidance and Digitalisation Strategy and Action Plan guidance.

In summary, we welcome the updated guidance documents and believe they are a significant improvement over the previous documents in setting out clear expectations for network companies in respect of Data Best Practice and Digitalisation.

The annex to this letter provides responses to the specific questions set out within your consultation. There are, however, a small number of key points I wish to highlight:

- We welcome the proposal to implement a structural change to the DBP guidance and the inclusion of intended outcomes for each DBP guidance principle. This is helpful in clarifying the aim of each principle and ensuring a consistent understanding across all stakeholders. We have provided some specific comments in our detailed response to help further develop these intended outcomes statements.
- We support the adoption of the Dublin Core as the Metadata standard. We agree that this will provide consistency for Data Users and will support interoperability. Whilst we agree with the use of this standard for the external publication of Metadata, we would not support any requirement to use it for solely internal purposes within Cadent. This is because a more granular level of Metadata may be required than that set out within Dublin Core.
- We agree that common open data licences to be important in enabling interoperability and will allow for greater data sharing and utilisation across sectors. We therefore support the requirement for licensees to use either of the Creative Commons Attribution Licence or the Open Government Licence as their open data licence.



- Whilst we are supportive of the requirement to publish a Data Catalogue to increase visibility of Data Assets, the definition should recognise the likely increase in Data Assets that will become available. As such, we would propose that the definition is amended to Data Assets that have been triaged and have Metadata available.
- We would welcome further industry discussion to support the development of principle 9 “Protect Data Assets and systems in accordance with current regulations and legislation relating to cyber security”. Further clarity is required in managing the tension between Data Best Practice and Cyber resilience, particularly to support establishing what does open data look like in the gas sector.

I hope you find our feedback helpful in developing these documents further. If you would like to discuss any of our comments further, please contact me on marta.czerep@cadentgas.com.

This letter is provided on a non-confidential basis.

Yours sincerely

[By email]

Marta Czerep

Head of Data Management and Data Science



Annex – Cadent’s response to specific questions

Q1. 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 welcome the proposed structural change to the DBP Guidance with its use of intended outcomes. Statements regarding the intended outcome for each principle gives the guidance greater clarity on the type of evidence required to demonstrate compliance.

We do however propose some suggested amendments to the wording of the intended outcomes in Q2 below to provide greater clarity.

Q2. What are your views on the proposed wording of our intended outcomes for each principle in DBP Guidance?

We have reviewed the wording of the proposed intended outcomes for each principle and a breakdown of our responses is shown below:

Principle	Intended outcome
1	We are supportive of the proposed intended outcome that requires two artefacts: 1) a process for identifying and applying the roles relating to Data Asset, and 2) a log of Data Assets.
2	We are supportive of the proposed intended outcome for having taxonomy for Data Assets and Metadata. However, as the ‘supporting information’ is not clearly defined and may contain different information for different Data Assets, we suggest that the reference to “supporting information” is removed from the proposed intended outcome. We agree with the proposed intended outcome that requires us to demonstrate commonality between taxonomy use across the sector. However, the term “commonly recognised” is not clearly defined in the DBP guidance therefore we would ask that further clarity is provided either by <ul style="list-style-type: none">• Inclusion of a definition for “commonly recognised” or• Rephrasing the intended outcome and include an example, or• Removal of the reference to this from both the principle and intended outcome.
3	We are supportive of the proposed intended outcome that will require us to publish a Data Catalogue in a way that Data Users can access, and which utilises the Dublin Core Metadata Standard and includes the core elements of Dublin Core. Where there are changes to the Dublin Core Metadata Standard, and the expectation is to use the latest version or a subsequent iteration, it would be beneficial if a timeframe can be established for implementation of the new standard and requirements to update the Metadata, where or if applicable, as this could be a time-consuming activity depending on the type of Data Asset and associated Metadata. We would therefore welcome a discussion on what an appropriate timeframe would be to adopt the latest version and then this can be included in the proposed intended outcome. We also agree with the proposed intended outcome to demonstrate the process for updating the Metadata.
4	We agree that potential Data Users should be provided with supporting information that enables them to understand the Data Asset. Our existing practice is to provide what we consider to be ‘supporting information’ to



	<p>current Data Users alongside the Data Asset, and we have a plan in place, that has been shared with Ofgem, to enable sharing supporting information with prospective Data Users.</p> <p>We can demonstrate that we currently have a mechanism to capture feedback and a process to review feedback and capture proposed actions.</p>
5	<p>We are supportive of the proposed intended outcome that will require us to have a Data Catalogue containing a log of Data Assets and this should be published and accessible for Data Users. However, it's important to note that we can only state the access level for Data Assets that have been triaged.</p> <p>We disagree that we can list access levels for each different type of Data User however, we can list the access level if it is Open or Shared for each Data Asset in the Data Catalogue, therefore, we would propose rephrasing the intended outcome to;</p> <p><i>"The licensee has a Data Catalogue in a location accessible to Data Users. The Data Catalogue states access levels to the Data Assets that have already been triaged and have metadata available"</i></p>
6	<p>We are supportive of this proposed intended outcome.</p>
7	<p>We are supportive of this proposed intended outcome.</p>
8	<p>We are supportive of this proposed intended outcome.</p> <p>However, we feel that the two proposed intended outcomes against this principle are stating the same thing. Therefore, we would ask that further clarity and/or distinction is provided between them, or either remove one or combine into one intended outcome.</p>
9	<p>Although we agree with tightening Principle 9 to adhere with the current regulations and legislation relating to Cyber Security in comparison to the previous and subjective wording of best practice principle, we do not feel that the scope of the relevant legalisation of the NIS Regulations and GDPR covers the entire scope of the Data Assets held at Cadent. We therefore recommend clarifying the expectations for those Data Assets out of scope of regulations and legislation. For example, adhering to certain controls in the CAF framework or following best practice as outlined in ISO27001.</p> <p>The intended outcome of this Principle also needs to clarify the expected requirements for compliance with those Data Assets not in scope of regulation or legislation.</p> <p>For both the amendments to this principle and proposed intended outcome, we would welcome further industry discussion to support the development of Principle 9 "Protect Data Assets and systems in accordance with current regulations and legislation relating to cyber security". We believe further clarity is required in managing the tension between Data Best Practice and Cyber resilience, particularly to support establishing what does open data look like in the gas sector.</p>
10	<p>We propose that the wording of the proposed intended outcome for para 3.27 of the DBP guidance document (para 3.116 of the DBP Supporting Information document), is amended to:</p>



	<p><i>"The licensee can demonstrate its process for archiving Data Assets and how the Data User needs were taken into account when deciding on appropriate timeframes for archiving Data Assets"</i></p> <p>We believe that the input from the Data Users should drive the requirements for the effective archival strategy, but we disagree with the proposed expectation that we are going to consult the Data Users on the archival process itself.</p> <p>We adopt the view that while engagement with the Data Users is beneficial to understand the needs of the Data Users in terms of availability of the historic Data Asset – therefore the availability of Data Asset should be driven by the needs of the Data Users, the process of archiving of the Data Asset itself should be driven by appropriate Solution or System architects. The limitations of certain IT systems used within the organisation, as well as cost and effort implications need to be weighted carefully to implement the appropriate and cost-effective archival strategy.</p>
11	<p>We support the proposed intended outcome for this principle but would like to propose an amendment in relation to the timeframe for adoption of the latest version of an Open Data Licence.</p> <p>There is an additional condition proposed to this Principle (para 3.33 of the DBP Guidance document and para 3.129 of the DBP Supporting Information document) in relation to the usage of the latest version of the open data licence and subsequent intended outcome (para 3.39 and para 3.135 respectively). While it is a reasonable and appropriate proposal, there should be an appropriate time frame assumed for the adoption of the new licence.</p> <p>Therefore, we would welcome a statement that allows a licensee to adopt a new licence within 12 months of this updated version being issued. This will ensure that any technical changes can be planned, designed, and executed without impacting on any planned new features and functionality of an open data portal.</p>

Q3. 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 support the use of the Dublin Core as the Metadata standard. We agree that this will provide consistency for Data Users on the available Data Assets and support interoperability. However, we believe that the use of this standard should only be a mandated requirement for external publication of Metadata, not internal purposes within Cadent.

Q4. If you do not agree with this proposal, are there alternative Metadata standards that should be utilised by licensees instead?

Whilst we agree with and support the use of the Dublin Core standard for the external publication of Metadata, to allow potential Data Users to discover and understand the types of Data Assets we are a custodian of, we do not agree with a mandated requirement to use it for internal purposes within Cadent.

We strongly believe there is a need to have the freedom to use other, more technical Metadata standards internally to describe the unique properties of the data elements within the Data Assets. This is because a more granular level of Metadata is required, than that set out within Dublin Core, to be able to inform the



design of digital products or services, or integration patterns and solutions between IT systems.

Q5. 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 currently share metadata using elements of Dublin Core and our plan is to publish both our Data Catalogue and adopted Dublin Core Metadata for those Data Assets that have been through our triage process on the Cadent website this summer. We expect to enrich the catalogue with new Data Assets and corresponding Dublin Core Metadata on a quarterly basis.

Q6. 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 agree that common open data licences to be important in enabling interoperability and will allow for greater data sharing and utilisation across sectors. We are therefore supporting the requirement for licensees to use either of the Creative Commons Attribution Licence or the Open Government Licence as their open data licence. Cadent are already using the latter.

Q7. If you do not agree with this proposal, can you suggest alternative open data licences to be utilised as a common open data licence?

We agree with the proposal and therefore are not suggesting any alternative standard.

Q8. 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?

Cadent has already adopted the Open Government Licence for Data Assets that are triaged as Open; therefore, we are already compliant with this requirement.

Q9. What are your views on our proposal to require licensees to create and publish a Data Catalogue of their Data Assets?

Whilst we are supportive of the requirement to publish a Data Catalogue, we suggest some amendments to the definition. Currently it describes a Data Catalogue as; *“An informative and searchable inventory of all Data Assets for which the licensee is the Data Custodian”*

However, we disagree with the proposal for the definition to include all Data Assets because if the expectation is for the Data Catalogue to be published, then it requires **all** key Metadata to be triaged. This does not recognise the iterative approach needed to build the Data Catalogue and time and resource required to identify and mitigate sensitivities within the Metadata and subsequently Data Assets. Therefore, we suggest amending the definition to:

*“An informative and searchable inventory of all **available** Data Assets **that have been triaged and sensitivities mitigated** for which the licensee is the Data Custodian”.*

Additionally, we suggest removing the word “live” from the Data Catalogue definition:



*“An informative and searchable inventory of all Data Assets for which the licensee is the Data Custodian. This allows users to search and identify key Metadata associated with a Data Asset. It should be kept **live**, updated, and be an accurate reflection of the licensee’s Data Assets.”*

As “live” implies instantaneous updates. The process of adding Data Assets to the Data Catalogue will be an iterative process, triaging the Metadata in the first instance, and the publicised Data Catalogue will be a living document that is accurate until new information is available and updated.

Q10. Do you agree with our proposed position on treating aggregated smart meter consumption data as Energy System Data?

Although Cadent is not a custodian of smart meter consumption data we do see ourselves as potential Data Users and agree with your proposed position to treat it as Energy System Data. We believe that access to smart meter data could be beneficial in the gas sector, to better understanding the needs of the communities we serve and energy consumption patterns when exploring the alternatives, such as hydrogen, in the future role of gas as a way of achieving net zero.

Q11. 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?

We do not have any opinion on this proposal.

Q12. 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?

We do not have any opinion on this proposal

Q13. What are your views on our proposal that licensees treat Data Assets associated with flexibility market operation as Presumed Open?

We do not have any opinion on this proposal

Q14. Do you foresee any specific barriers to treating Data Assets associated with flexibility market operation as Open Data?

We do not have any opinion on this proposal