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Dear Liam

UK Power Networks' response to the Consultation regarding updates to Data Best Practice Guidance and Digitalisation Strategy and Action Plan Guidance.

Thank you for the opportunity to respond to the Consultation regarding updates to Data Best Practice Guidance and Digitalisation Strategy and Action Plan Guidance. This response is on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. We are GB's largest electricity Distribution Network Operator (DNO), dedicated to delivering a safe, secure and sustainable electricity supply to 8.4 million homes and businesses.

We recognise the proposed update of Data Best Practice as a positive evolution of the current guidance, providing greater clarity and specificity, which should be beneficial in driving greater alignment across licensees. There are however areas where we feel greater detail, more defined scope and consideration of certain constraining factors need to be considered to ensure effective implementation and fulfilment of the desired outcomes. Our feedback on these points is set out in the appendix to this letter alongside our full response to the questions posed.

We hope that this information is helpful. If you have further questions, please let us know.

Yours sincerely



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Appendix

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?

UK Power Networks agrees with Ofgem's proposal to implement a structural change to Data Best Practice (DBP) Guidance with the aim of introducing intended outcomes for each principle. We consider that this will positively contribute to addressing what we agree is a common challenge with respect to varying interpretations and differing approaches in the development and implementation of digital products and services across licensees. We consider it to be of the utmost importance to strive for commonality, if not standardisation, across what we regard as common digital enablers – e.g. data licensing, metadata standards and data modelling.

Clear definition of what is expected in terms of the resultant outcomes of applying DBP Guidance will only aid in driving alignment and consistency, providing clarity while not being overly prescriptive, which risks inadvertently constraining innovation and advancement.

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

In responding to this question, we have provided feedback and our views with respect to the wording of the explanation of the principles as well as the intended outcomes. We have done so because we consider that the overall contextualisation and definition of each principle go hand in hand with the intended outcomes and therefore need to be clearly aligned.

As a general observation across all principles, we read the 'intended outcomes' more as a definition of outputs or how application of the principles should be evidenced rather than an articulation of the desired outcomes. We have as such stated what we see as the outcomes that result from delivery of these outputs and fulfilment of the principle and suggest restating this element of the DBP Guidance to, 'Outputs & Outcomes'.

Our responses per principle are as follows:

Principle 1 – Identify the roles of stakeholders of Data Assets.

Although we agree that it is necessary to identify and understand the roles and associated accountabilities of stakeholders relating to data assets, we question the use of the terms 'Data Custodians', 'Controllers', 'Processors' and 'Subjects'. These are predominantly General Data Protection Regulation (GDPR) terms, principally relating to the handling and control of Personally Identifiable Information (PII). In the context of GDPR the requirement to identify these stakeholders applies per process, not per data asset (Article 30 of GDPR). Furthermore, it also relates to organisations that fulfil those roles rather than individuals or stakeholder groups.

The adoption of these terms and the requirement to log this information in the manner proposed is, in our opinion, not appropriate and would create a disproportionate administrative overhead with limited corresponding value. It is particularly unrealistic for this principle, as proposed, to apply to all data assets. We believe it would be more appropriate for this principle to relate specifically to key data assets – i.e. those that support enterprise obligations, critical business functions or processes, that poses a compliance risk, has the potential to cause customer dissatisfaction, or could result in direct financial loss if not appropriately managed and controlled.

The requirement could be further simplified and made more effective in terms of achieving the stated outcomes by instead requiring the assignment of Data Custodian and Steward roles (or equivalent given that individual organisations are likely to use different terms dependent on the data management framework they align to). Custodians should have principal accountability for the definition, control and appropriate use of a given data asset, supported by Stewards with more direct responsibility for the day-to-day management and use of the data. We believe these roles therefore align with the outcome defined.

Additionally, we are unclear on the meaning/intent of Intended Outcome 3.3 of the revised DBP Guidance – ‘*The licensee has a log(s) identifying its Data Assets using the ontology from 3.2.*’ We believe the typical and appropriate place to log information like assigned roles is the Data Catalogue. We are therefore unclear as to the relevance of ontology in this context.

With specific reference to the intended outcomes, we believe this currently omits the key outcome with respect to having clearly defined ownership and accountability for critical data assets (within the scope of energy system data) to ensure appropriate and effective definition, monitoring, control and use.

Principle 2 – Use common terms within Data Assets, Metadata and supporting information.

Whilst agreeing with the intent and ambition behind this principle, as drafted it presents some ambiguity, which risks undermining that intent.

The use of common terms allows for diversity with respect to the terms used within data assets, metadata and supporting information. Within the energy sector there are examples of different terms which share the same or similar meaning that are commonly used (e.g. load and demand or available capacity and headroom). Similarly, a single term can often have multiple definitions or meanings (e.g. asset or high voltage).

The use of common terms is likely to fall short in achieving the objective of improving the discovery, interpretation and appropriate use of data assets. Therefore, to achieve commonality of terms, there needs to be alignment to a defined standard. The question in that respect is what standard applies or, where a standard does not exist (which we believe to be the case), who is accountable for defining and the ongoing administration of such a standard?

In any instance, it is difficult to achieve standardisation of this nature given the potential scale in the absence of a definitive scope. Such activities are challenging when conducted within an organisation, let alone when you start to tackle that at a sectoral level. However, UK Power Networks, like other licensees, are prioritising the formal capture of definitions for common terms, contained within corporate business glossaries. This aims to provide a clear reference to a definition, identifying aliases where they exist, rather than forcing alignment or standardisation.

A more pragmatic approach to this principle would be to restate it so that it specifies the application of agreed standard definitions to any terms associated with common published data assets. This would be of direct benefit to the end Data User whilst contributing to the broader development of common semantics, achieved as part of collaborative activities related to the development and delivery of mandated and common data assets (e.g. Long Term Development Statement (LTDS), Embedded Capacity Register (ECR), Ten Year Statement).

If the objective is, as the explanation (Paragraph 3.4) implies, that this is targeted more towards standard classification and categorisation of data, that is more achievable but not consistent with the phrasing of the principle. Equally, if that is the case, the requirement to define what standard is to be applied or who has responsibility for definition of such a standard remains and begins to overlap with Principle 3 in relation to metadata.

Finally, the intended outcomes do not state what is surely the prime objective of improving the discovery, interpretation and appropriate use of energy system data assets by Data Users.

Principle 3 – Describe data accurately using industry standard Metadata.

As written, the explanation provided in Paragraph 3.9 – *“There is no requirement for the licensees to create Metadata about its Metadata associated with Data Assets”* – is not particularly clear as to its meaning or intent.

If our interpretation is correct and the objective is to clarify the scope of metadata as only being required for the data assets themselves, then this could be stated more simplistically.

The intended outcome that is missing in this instance is the objective of ensuring consistent structuring, definition and presentation of metadata to ease data discovery, interpretation and interoperability of energy system data assets when navigating between licensees.

Principle 4 – Enable potential Data Users to understand Data Assets by providing supporting information.

We agree with the proposed wording of this principle but believe it would be beneficial to provide definition of what constitutes supporting information as this is a broad term that can be interpreted in several ways.

It could for instance be considered that the provision of metadata against a given data asset in accordance with Principle 3, along with offering a defined point of contact would fulfil this principle (as such Principles 2 to 4 overlap and appear to repeat one another). Equally, supporting information could extend far beyond this, potentially resulting in significant variation in individual licensees' responses. Again, the key intended outcome is not stated. In this instance, we see this as being that Data Users are provided with sufficient insight and context, relating to the energy system data assets to ensure efficient, effective and appropriate use, but not unlimited additional supporting information.

Principle 5 – Make Data Assets discoverable for potential Data Users.

We believe that this principle is achieved through fulfilment of Principles 2 to 4. We therefore support the intent of the principle but feel improvements could be made to its definition.

First, although not explicit, the explanation in Paragraph 3.17 suggests that all energy system data assets under the custodianship of the licensee should be identifiable/discoverable. We do not believe that this is desirable for the Data User or feasible for the licensee. If the expectation is for all energy system data to be in the scope of this requirement, it would present a significant undertaking and an enduring overhead with little to no corresponding benefit. Worse still, it is likely to result in making data discovery and exploration prohibitively complex.

We believe it is appropriate to provide a clear articulation, or at least an indication of the expected granularity of the definition of the energy system data assets that fall within the scope of this principle, and perhaps more broadly to the entirety of DBP Guidance.

For instance, is it the case that this relates to all energy system data, or just those that are deemed as open or shared following Data Triage? Equally, when referring to Data Users, does this apply to both internal (i.e. licensee employees) and external stakeholders? The definition provided for Data Users suggests it does, which results in a much broader scope in respect to fulfilling this principle.

A second observation relates to clarification of Paragraph 3.17 - “The licensees must ensure that the Metadata associated to Data Assets is discoverable to Data Users, subject to the outcome of an Open Data Triage process.” It is not clear if this is suggesting that metadata only need be discoverable where Data Triage establishes that a data asset is shared or open or, alternatively, that metadata itself be the subject of Data Triage and therefore that even if a data asset is closed, the metadata should be published and discoverable.

We would support the former but not the latter, although that position is subject to what is considered metadata. We would for instance agree that there is value in providing visibility of baseline metadata for a closed data asset within a data catalogue to provide transparency and insight of the rationale for why data cannot be shared or published (in line with Paragraph 3.30).

The missing intended outcome for this principle is the provision of full visibility of energy system data assets under a licensee’s custodianship, expediting data discovery, access and use, and by extension, reducing time to derive value.

Principle 6 – Learn and deliver to the needs of current and prospective Data Users.

We agree with the proposed wording of this principle but suggest that there is an opportunity to promote transparency and collaboration in this respect between licensees.

To put that into context, delivering standardised data access and a consistent user experience when navigating between licensees’ data services would be aided if based on a shared understanding of the targeted Data Users and their needs.

The intended outcomes should state the objective of licensees’ possessing and delivering against an in-depth understanding of the data user landscape, their requirements with respect to access and use of energy system data, their current and aspirational use cases and the corresponding value proposition.

Principle 7 – Ensure data quality maintenance and improvement is prioritised by Data User needs.

We agree with the proposed wording of this principle and associated intended outcomes.

A beneficial additional outcome would be the delivery of proactive data quality interventions to drive the continuous improvement of energy system data assets to increase reliability, usability and resultant trust/confidence.

Principle 8 – Ensure Data Assets are interoperable with Data Assets from other data and digital services.

As with our response to Principle 5, we consider clear definition of scope to be a key factor in relation to this principle.

Interoperability itself is a term that would benefit from greater definition as it is something that we have observed can be and often is interpreted in various ways. Equally it is something that can be achieved via different avenues, such as data modelling, metadata and data exchange mechanisms, or a combination thereof.

Beyond that, we believe that interoperability may not be universally applicable across all energy system data, at least not in respect how it is achieved. For instance, it is unlikely that it will be necessary to publish all data in an IEC Common Information Model (CIM) compliant form. The requisite level of interoperability for a given data asset and the corresponding use cases may be adequately catered for by less complex means – even something as simple as an XML file with an agreed common data model. What is of utmost importance is that we are confident that the level of investment in achieving interoperability is justified by the corresponding need and specific requirements.

Greater clarity will therefore be beneficial in terms of ensuring proportionate and appropriate action in response to fulfilling this principle.

The intended outcome that needs to be stated in this instance is the ability for Data Users to be able to access, consume and use energy system data (and metadata) from licensees in a consistent form or forms which is recognisable and readily usable, by both human and machine, with little or no need for interpretation, translation, or re-engineering prior to use.

Principle 9 – Protect Data Assets and systems in accordance with current regulations and legislation relating to cyber security.

We agree with the proposed wording of this principle.

The intended outcomes should state the objective of ensuring that the security, integrity and control of energy system data is maintained.

Principle 10 – Store, archive and provide access to Data Assets in ways that ensure sustained benefits.

As with our response to Principles 5 and 8, we consider clear definition of scope to be a key factor.

Whilst recognising why it is desirable to seek the views of stakeholders in respect to the potential future value of certain data assets, it needs to be recognised that this is not universally applicable.

First, we do not feel that stakeholders is the appropriate term in this context given its generality. We would prefer that this be articulated in the context of Data Users given that specifies those with a vested interest and underlying knowledge of the data assets in question.

Furthermore, the handling, retention and storage of data are principally informed by legislation, corresponding data protection standards and internal policies. Such factors must take

precedent over the views and opinions of what is almost certain to be a broad and dynamic stakeholder community.

To ensure appropriate and effective application of this principle we would suggest clearer definition stating that stakeholder input in this regard is only relevant for shared and openly published data assets, not necessarily all energy system data assets.

The intended outcome absent in this instance is that the value of shared and openly published energy system data assets is maintained beyond the operational lifecycle of that data asset, where appropriate.

Principle 11 – Treat all Data Assets, their associated Metadata and Software Scripts used to process Data Assets as Presumed Open.

We agree with the proposed wording of this principle and associated intended outcome. We would however suggest a minor revision to Paragraph 3.33 to state, “...or a subsequent iteration, of the Creative Commons Attribution Licence and/or the Open Government Licence,” given that it may be deemed desirable to apply dual licensing.

With reference to the intended outcomes, we would suggest that there is an unnecessary level of overlap/duplication with those from previous principles – for example Paragraph 3.40 relates to Paragraph 3.16, with the latter being the more relevant.

Additionally, the current statements fail to articulate the overarching outcome of unlocking otherwise siloed and inaccessible energy system data with the intention of facilitating digitalisation of the energy system, promoting open innovation and realising the full potential value of that data.

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?

It is positive to have a definitive steer from Ofgem with respect to the metadata standard that should be adopted and applied by licensees. However, although Dublin Core provides a domain-agnostic standard which can be easily understood and implemented, and which is well-known and widely used, it must be recognised that it does have its limitations.

Dublin Core has 15 principal fields which, according to the standard can legitimately be left blank. Amongst these principal fields is a very ambiguous attribute called Date and there are hundreds of additional optional attributes which can be utilised. Such ambiguity and optionality therefore present the risk of inconsistency in application of this standard.

A further notable insight we have gained while assessing available data cataloguing tools is that Dublin Core is considered by some technologists to be an outdated standard which is not catered for without a degree of configuration or customisation.

Whilst Dublin Core presents these limitations, other metadata standards are not without their own constraints, and none present an ideal option. Equally, we have not found an alternative that is consistently utilised across data management and governance technologies. UK Power Networks therefore supports committing to Dublin Core but proposes what we consider a more practical and pragmatic approach in the application of the standard to address the challenges described.

We propose that rather than mandating the full application of Dublin Core, it is instead required that all metadata for shared and openly published data assets must map to the 15 principal Dublin Core

attributes, potentially along with a specified subset of the optional fields, where deemed appropriate and of value – something that the ENA Digitalisation Data Steering Group is well placed to review and recommend.

This approach allows individual licensees to utilise metadata attributes beyond the scope of Dublin Core and therefore the potential broader capabilities of contemporary data cataloguing tools whilst still providing baseline commonality, alignment and interoperability of metadata across licensees' openly published and shared data assets.

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

As previously stated, we agree with the proposal to utilise Dublin Core and do not consider there to be a more suitable alternative.

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?

UK Power Networks has already implemented Dublin Core across all openly published data assets.

We have also adopted Dublin Core as the metadata standard for internal data assets and are progressively extended its application. Given the nature of this exercise, the development of a comprehensive enterprise data catalogue will be incrementally developed over a protracted period, prioritising critical data assets in the initial phases. A key enabling activity in this respect is the procurement of a data cataloguing tool, which will be implemented throughout the second half of 2023.

We note that no target date for fulfilment of this requirement has been proposed or defined. We assume that this is subject to the responses to this question. We would as such like to ask that a date be specified to ensure a consistent response from all licensees and suggest that no later than the end of 2023 is appropriate. Greater clarity is also desirable in terms of what is considered to be implementation as it is not clear to licensees whether that is constituted by just implementing a policy, or rather through the actual publication of metadata in the expected format.

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 welcome Ofgem specifying the use of Creative Commons (CC) Attribution and Open Government Licences (OGL) as the standard open data licences. It is however important to recognise, in a similar vein to the previous commentary on metadata standards, that no one licence is perfect and each of the proposed licences present limitations.

UK Power Networks publishes all open data assets under an unadulterated CC BY 4.0 licence. We were however contacted by Open Street Map who considered this form of licence to be incompatible with the Open Database Licence which they utilise, therefore impacting their ability to utilise our openly published data in the manner they would ideally want.

Offering up both CC and OGL as options goes some way to addressing this but, considering this kind of issue, we would recommend that the option of dual licensing also be explicitly stated, thereby giving the Data User optionality with respect to which licence to apply when utilising a

given data asset. However, having explored that as an option ourselves, even that does not necessarily resolve all potential compatibility issues and all parties involved need to be mindful of meeting the majority of needs at reasonable cost rather than catering for every detailed option for every user and in doing so incurring additional costs.

A useful resource to gain some insight into this kind of issue can be found via the [Open Modelling Initiative](#) where this topic is extensively discussed.

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?

It is UK Power Networks' opinion that CC and OGL provide appropriate and effective open data licences that are well established, universally recognised and effectively used across industry. We do not therefore see any need to consider further alternatives.

We also note that in Paragraphs 1.64 and 1.70 of the consultation, there is the suggestion of development of a common open data licence. It is our opinion that this is neither desirable or necessary and should be avoided. This activity should simply be about adoption of an existing licence or licences.

Development of a new licence would require considerable time and effort by all licensees. That is unnecessary when we have effective licences readily available, and it would only be adding to the already complex licensing landscape. It is also likely to present challenges as the licensees to which DBP Guidance applies is extended, whereby new participants may challenge any bespoke terms within the existing licence, likely resulting in further debate and potentially endless iteration. The difficulties that such a development activity and subsequent evolution would entail when so many organisations and their legal representatives are involved should not be underestimated and will almost certainly be counterproductive.

We believe that adoption of an established international open data licence (therefore circumventing questions of national jurisdiction) like CC BY 4.0, should be a simple thing to achieve in the interest of the Data User. It is therefore disappointing to see the level of divergence that has taken place between licensees who have adopted a variation of licences, and in most cases revised those existing licences with the introduction of additional clauses and terms. This only introduces restrictions, thereby undermining their very purpose given that the presence of any limitation can only be considered as meaning they are no longer truly open licences.

In any instance where terms are required which could be considered as caveats, a good example being in relation to the potential use of outdated or incomplete geospatial network records to inform planning or operational activities, it is our view that these should be included within the End User Licence Agreement (EULA) for the given organisations data portal and/or within the contextual metadata accompanying each data asset. This ensures appropriate control with respect to limitations and appropriate use without needing to alter the open data licence.

We would therefore like to see this requirement go further in both specifying the open data licences to be used as standard and stating that these should be utilised in their unadulterated form. Without this, each organisation will be likely to continue to apply their own clauses, diverging from any form of standardisation.

It is important to clarify that the above only relates to open licensing. When it comes to licensing of data where publication is more limited (e.g. Shared), then any desire to achieve a degree of standardisation will absolutely require collaborative development and allowance for variation.

In the case of more restrictive data sharing agreements, it must be recognised that individual company policies and varying risk appetite need to be considered and accommodated. It would however be desirable, both from an efficiency perspective and for the Data User, for there to be a commonality across licences. The best way to achieve this is to define a common baseline licence which has defined common clauses with agreed options therein, along with the ability to build in additional terms where necessary. This should however be a longer-term aspiration and secondary to gaining standardisation of open licensing.

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?

UK Power Networks already applies CC BY 4.0 to all openly published data assets. The decision to adopt this licence was made based on guidance and consultation with specialists from the Open Data Institute, our internal legal advisors and stakeholders.

As part of this exercise, we have evaluated other existing open data licences, including OGL a key conclusion of which is that CC BY 4.0 and OGL are not aligned and consistent. By means of an example, there is a clause in the OGL which states:

“This licence is governed by the laws of the jurisdiction in which the Information Provider has its principal place of business, unless otherwise specified by the Information Provider.”

By comparison CC BY 4.0 makes no such provision, instead referring to difference in jurisdiction within the following clause:

“Nothing in this Public Licence constitutes or may be interpreted as a limitation upon, or waiver of, any privileges and immunities that apply to the Licensor or You, including from the legal processes of any jurisdiction or authority.”

These terms have different implications, by our interpretation making OGL more restrictive than CC BY 4.0 in the context of open data. If both licences are to be offered up as acceptable options under DBP Guidance, it is important to consider the implications for the data user if accessing the same data asset from different licensees and under the two different licences.

We note that no target date for fulfilment of this requirement has been proposed or defined. We assume that this is subject to the responses to this question. We would as such like to ask that a specific date be specified to ensure a consistent response from all licensees. We suggest that no later than the end of 2023 is appropriate.

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

UK Power Networks agrees with this requirement. It would however be beneficial for Ofgem to be more explicit in defining what it means by Data Catalogue as this can be interpreted in a number of ways.

We for instance have a data catalogue on our data portal from which Data Users can navigate to a given data asset. This however only relates to those data assets which are shared or openly published via the portal. Arguably, external Data Users do not need a catalogue of data assets unavailable to them, so does our existing service fully satisfy this requirement?

If this does not meet Ofgem's expectation is the aim is to provide full visibility of all data assets, irrespective of whether they are shared/openly published? Alternatively, is the requirement for all licensees to have a data catalogue to facilitate data discovery within the organisation, irrespective of the extent to which this is visible to external Data Users?

Given that a data asset within a licensee organisation could be a SharePoint site, a set of spreadsheets or even unstructured content, all of which would entail a considerable amount of effort to catalogue with very minimal benefit, we believe the requirement needs to be more precisely articulated to provide a clear scope of what is expected to be catalogued and to whom that needs to be available.

Additionally, we note that no target date for fulfilment of this requirement, subject to a clearly defined scope, has been proposed or defined. We however suggest that no later than the end of 2023 is reasonable for licensees to have a Data Catalogue in place, recognising that development of associated content will be an ongoing activity, incrementally expanding over time.

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

As stated in our response to the Call for Input which preceded this consultation, in principle we agree that de-personalised smart meter demand data should be treated as Energy System Data. The data has the potential to be a valuable resource providing insight into the distribution systems. Sharing this data in an aggregated format, with appropriate data privacy and security arrangements in place, would provide opportunities for organisations within the energy sector to benefit consumers by offering services and products not yet considered or developed.

For example, we note that paragraph 6.12 of Ofgem's Metered Half Hourly Settlement Decision Document dated 20 April 2021 advises on the merits of daily data over monthly data and that, "access to daily data would be consistent with the permitted level of access to data for other regulated purposes that deliver benefits to the system as a whole, such as investigating suspected theft/fraud".

The progress towards meeting the GB net zero targets, via increasing levels of electrification of heat and transport, will undoubtedly place an increasing burden on the existing electricity networks assets. We therefore consider that having access to daily level of aggregated data, instead of monthly level aggregated data (as per SLC10A), would also deliver benefits to consumers and support DNO regulated purposes for the provision of a safe, reliable and improved quality of supply to customers.

If daily aggregated data were made available to users instead of monthly aggregated data, this would provide greater capability to consumption data users in the development of services, providing additional benefits to energy consumers.

In considering the practicalities of the proposal to treat smart meter consumption data as system data, it naturally needs to be recognised that, as like all other network operators, UK Power Networks processes all smart meter data in strict accordance with its approved Smart Meter Data Privacy Plan (DPP). Where the data is aggregated to provide a distribution network level view of energy usage, it will become de-personalised and could, subject to the points set out below become available to users in the future.

As it stands, our Ofgem approved DPP does not permit sharing of smart meter data with anybody other than those with a legitimate requirement for its use, such as Independent Connection Providers (ICPs) under the Connections Code of Practice. We cannot therefore classify smart

meter data as Open Data without a revision to the DPP and associated Ofgem approval. This is however a governance issue rather than technical issue given that if the same approach is applied with respect to data aggregation as defined within the DPP, the data will be suitably anonymised.

It is also important to recognise that each DNO's DPP is unique with variations in respect to how consumption data is collected and anonymised. We believe that to effectively share interoperable consumption data, it will require at least a degree of commonality and standardisation, with a level of regulatory mandate and intervention.

Beyond this, there are also important technical aspects which will need to be considered and understood in moving to publish this data asset. For instance, the value of de-personalised smart meter demand data is maximised when there is clear association to the point on the distribution network where that measurement refers to.

A further complexity is that smart meter consumption data will be aggregated to an acceptable level to ensure consumer privacy is maintained. This will in turn need to be mapped to the distribution network (e.g. LV Feeder) based on normal network configuration. However, network configuration is dynamic and subject to changes in configuration, and it is unlikely that aggregated smart meter measurements will change to reflect such reconfiguration. Depending how often these changes occur, and how significant they are, smart meter Data Users may need to be made aware that the consumption data they are utilising no longer aligns to the current network running arrangement.

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?

Publication of non-interoperable smart meter consumption data by 14 October 2023 is achievable providing that we are only required to share data we have in our possession. We however question whether it is in the interests of the energy sector and consumers to do so.

A key consideration in this respect is that the penetration of smart meters is still not at sufficient levels. DNOs are not therefore currently collecting significant volumes of smart meter consumption data and there are material changes taking place across the Data Communications Company (DCC) smart meter infrastructure to maximise the success of existing uses for consumption data. These changes will take time to complete and require DNOs to make corresponding changes to their own systems.

We do not therefore consider publishing this data in a non-interoperable fashion by 14 October 2023 to be necessary or appropriate. We instead propose that the industry focus remains on resolving existing data access issues so that consumption data is accessible by DNOs, before diverting effort onto making process and system changes necessary to make this information more widely available. We also question the benefit to stakeholders of publishing non-interoperable incomplete data and believe that it would be a better use of limited resources to concentrate on defining then publishing more complete interoperable data as covered by Question 12.

To support that suggestion, the full extent of the enabling activities and developments necessary to achieve publication of this data asset, whether in an interoperable form or not, needs to be understood and considered:

- Revision, approval and implementation of required changes to DPPs and associated documentation (which is extensive and includes a Data Privacy Impact Assessment). Ofgem may also need to provide guidance on redrafting this assessment given that the use of the published data would be outside of the licensee's control.

- A revised DPP would need to be approved by Ofgem, hence publication of the data by 14 October 2023 would be dependent upon the timing of a) Ofgem's decision to implement the proposed changes and b) approval of revised DPPs submitted by each licensee.
- Collaborative definition and agreement between licensees and Ofgem of the common scope, structure and content of what constitutes interoperable smart meter consumption data - i.e. will it include a measurement point at a specific timestamp, or will it be an average value (e.g. a 30-minute average applied to a specific timestamp)? Will the user be informed of the number of smart meters that make up the aggregated value, etc?
- Development and implementation of enabling technology pipelines to facilitate secure transfer, aggregation and storage of smart meter consumption data (if not already in place). A key consideration in this respect is that the volume of published data is likely to be significant – infrastructure and tooling needs to be sized accordingly.
- Metadata definition and associated data catalogue development (as covered in earlier points of this consultation) to ensure Data Users understand what the published data assets represent and corresponding limitations/appropriate use.
- Development of a suitable mechanism/service via which aggregated smart meter consumption data can be openly published or shared with external Data Users (if not already in place).

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 agree that if aggregated smart meter data is to be shared and/or openly published, then it should be made available in an interoperable format to ensure value can be maximised in an efficient manner by Data Users. Developing the common standards and mechanisms to achieve this will however require coordinated collaborative effort between DNOs and Ofgem. This represents a significant piece of work and achieving alignment between DNOs who already have different DPPs, with varying risk appetites, maturity levels and data related capabilities cannot be underestimated.

With this in mind, we believe greater clarity is necessary with respect to interoperability in the context of smart meter consumption data. If, for instance, the extent of the requirement is to apply common open licencing and metadata (as per paragraph 1.51 and 1.59 of the consultation), along with publication via an open data portal, then that is a different proposition to if the requirement is to apply consistent aggregation methods and application of a standardised ontology.

The prospective uses of aggregated consumption data are also, to some extent, unknown. To develop an interoperable methodology, it will be necessary to have a greater understanding of prospective uses for aggregated smart meter consumption data.

Provided that there is clarity on these points, and depending on the implications associated with that clarity, we believe that six months from the date of a decision by Ofgem should be sufficient time to develop an interoperable methodology across all DNOs, recognising that the constraints and activities outlined in our response to Question 11 also apply in this instance.

In summary, UK Power Networks supports the proposal for determining an interoperable methodology for smart metering consumption, subject to the above considerations. However, we

do not consider the implementation of the agreed methodology and subsequent publication of the data asset by 28 February 2024 to be achievable. We would like to request clarification as to whether that is the intent.

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

UK Power Networks supports flexibility market operation data assets being treated as presumed open.

Most data referenced is readily available via the annual LC31E Flexibility Statement/Report and transitioning to make this available via our open data portal represents a simple task, subject to the outcome of Data Triage.

However, we seek clarification with respect to Paragraph 1.119 of the consultation where it is stated that, “The ESO, in the operation of the Demand Flexibility Service, publishes market data on bids on the day bids are accepted/rejected. Data showing the utilisation of assets is published as soon as settlement data is obtained for the event. Under our proposal, we would expect a similar level of data availability from DNOs and, where used, independent market operators.”

We interpret this as meaning that DNOs are expected to be able to publish market data on bids the day that they are accepted/rejected. Imposing such a requirement needs to consider the comparative volume of bids and the associated data which is likely to render this difficult to achieve.

As we move towards nearer real-time markets, we share Ofgem’s ambition to publish same day. However, the current tender process for flexibility contracts requires sign-off following review of the bids – typically weeks, if not months, after the bid is accepted. We would not want to create a situation which could prejudice the signing of these contracts through prior publication of associated data. Publication should therefore align with when contracts have been signed.

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

We do not consider that there are any barriers to the publication of flexibility data, but it is important to be cognisant of issues relating to data privacy, commercial sensitivity and compliance with Section 105 of the Utilities Act. We however believe these can be mitigated through appropriate aggregation and anonymisation, along with prohibiting publication of pricing or availability information during any bidding window.

We advocate discussion with stakeholders and Ofgem with respect to prioritising the publication of data assets relating to flexibility market operation, targeting those where they would accelerate publication and provide greatest benefit. We would also welcome other parties, such as the ESO, in being more collaborative and participative in the publication/sharing of flexibility data.

Additional Questions

Further to the above responses, we have the following additional feedback and questions aligned to the corresponding paragraph of the consultation:

- 1.20 Ofgem identifies issues in relation to differing interpretation and approach in fulfilling DBP Guidance principles, along with divergence in the enablement of interoperability. We

believe this presents the risks of it being possible for individual licensees to meet/comply with the principles but collectively failing in the delivery of the outcome.

Does Ofgem therefore intend to provide insight into where they see best practice and approaches being implemented across the licensee community? Without this insight, individual licensees are unlikely to move away from their current approach or trajectory given the likelihood of rework and reinvestment.

- 1.22 It is stated that Ofgem, “proposes to provide further clarity when setting out our principles for licensees to uphold when utilising and sharing Energy System Data. We believe regular updates and clarifications to DBP Guidance can help our regulations respond to a fast-changing industry.”

When and where will Ofgem provide further clarity and is there a view of how frequent, “regular updates,” will be?

- 1.40 States that, “This is an important step to ensure our approach to Digitalisation is consistent across all network licensees. An additional purpose of requiring compliance with DBP Guidance and DSAP Guidance, is to ensure that the overall national energy system is designed and operated in a way that is in harmony with the wider digitalised ecosystem. To achieve this, we will need to expand the requirement to comply with these guidance document over the coming years.”

In addition;

- 1.41 States that, “In our Call for Input on Data Best Practice Guidance, we signposted our intent to expand compliance with DBP Guidance beyond network licensees. This was favourably received by respondents; however, we are not proposing to introduce this requirement to any other energy sector participants at this time. Organisations may adhere to the guidance documents voluntarily if they choose to do so.”

Given that respondents responded favourably to the suggestion of expanding the application of DBP Guidance to other licensees, can Ofgem provide an explanation for this decision given the obvious benefits broader application would present?