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14 April 2023

Dear Liam,

**Response from National Grid Electricity Transmission (NGET) plc to the Consultation on updates to Data Best Practice Guidance and Digitalisation Strategy and Action Plan Guidance**

Thank you for the opportunity to respond to the above consultation on behalf of National Grid Electricity Transmission (NGET) plc. This letter provides the summary of our response; the full detail is included in Appendix 1 by way of an answer to each question posed in the consultation.

We welcome the introduction of the 'intended outcome' section to the Data Best Practice guidance document. We agree with the proposed change and appreciate the clarity it seeks to provide on the intention of the principles. To add even more clarity, we think that the 'intended outcomes' would benefit from being more specific, rather than being as generic as they currently are. This will reduce openness to interpretation and therefore divergence in application of the principles, which is the reason for the inclusion of the section.

NGET also welcomes the requirement for a Data Catalogue to be part of the data best practices and the adoption of an industry metadata standard. However, we need clarification on the following points:

1. With regards to the Data Catalogue, we would like additional clarification on the Ofgem definition of a Data Catalogue and more specifically the scope of the data we should catalogue. Our data management strategy views data as a product and as such we catalogue all data products, the associated metadata, the lineage, and source of that data. We do not consider data which has no current business value as a product and therefore it is not catalogued until such a time as value is identified and a product is created around it. An example of such a data set would be telemetry data where the volume can be extensive, but value is selective.

The definition of a data catalogue added as part of this consultation suggests that all data assets need to be catalogued. Since the definition of Data Asset can be interpreted as 'anything containing data', a clarification on whether this addition to the guidance would mean that we would be expected to catalogue all data (irrespective of current value) would be helpful.

2. We would also like to gain a greater understanding of Ofgem's expectation on catalogue availability. This links to the first point above as the determination of the broader use would impact the choice of platform. Our current plan is to surface catalogued data via a portal so additional information can be collected by data customers in conjunction with the catalogued data and improve data customer experiences. Different platforms have different

capabilities, some being more business- and user-interface-focussed and others being more technically structured. Understanding the full intended use expectations will impact the choices we make.

With regards to the classification of aggregated smart meter consumption data and Data Assets associated with the operation of flexibility markets as 'Energy System Data', NGET welcomes the principle that assumes all data is Open by default and considers that the extended definition is helpful. We will strive to ensure this principle is applied in the development of all data products.

Please see our response to the consultation questions in appendix 1 below.

Confidentiality

I confirm that this response can be published on Ofgem's website.

Yours sincerely,

(by email)

*Matt Clark*

Data Director

**nationalgrid**

## APPENDIX 1.

### Consultation Questions from Ofgem

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?*

NGET has no objection to the proposed changes in structure and welcomes the outcome-based approach.

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

While the intended outcomes are good and clearly written, they could benefit from being more specific and direct in terms of measurable outcomes and less generic.

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 welcome the use of a metadata standard, and the Dublin Core is a good basis. We expect to expand on this standard where it makes sense to do so.

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

Dublin Core is an acceptable standard.

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?*

As we are expecting a shift from internal standards to an industry-wide standard, plus the potential redevelopment of automated processes to populate data catalogues and data contracts, there needs to be a reasonable length of time to process this effort. We estimate that NGET would need 18 months from the date the updated guidance comes into force to fully implement both the standard and the mechanisms to populate.

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?*

On the understanding that we will already have completed 'Data Triage' on any data we are publishing (and therefore addressed any sensitivities), we are comfortable with this requirement.

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?*

We agree with the proposal.

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?*

As with the metadata standard, complying with the adoption of an industry standard will take time to integrate and implement fully. As the two are linked, NGET foresee the same 18-month timeframe (from the date the updated guidance comes into force) being required.

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

We have no objection to the definition of a Data Asset but are concerned that the new definition of Data Catalogue indicates that we would be expected to catalogue *all* Data Assets regardless of their current business value (as described in point 1 of our covering letter). We would welcome the opportunity to discuss this further with you.

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

We have no objection to, and we see the benefits to the industry of, such data being available as open energy system data.

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?*

We have no objections to this position.

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?*

We have no objections. The DNOs are best suited to determine the methodology as, unlike transmission network licensees, they handle smart meter data

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

We have no objections on this point.

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

We foresee no specific barriers. We believe that all aspects of data best practices combined play a role in enabling open data. With that in mind, for such data to be open, it will take Licensees time to implement and expose data against these standards.