

Centrica plc  
Regulatory Affairs  
Millstream  
Maidenhead Road  
Windsor  
Berkshire  
SL4 5GD  
[www.centrica.com](http://www.centrica.com)

Liam Bennett  
Energy System Data Regulation  
Ofgem  
10 South Colonnade  
Canary Wharf  
London  
E14 4PU

14 April 2023

Sent by email to: [digitalisation@ofgem.gov.uk](mailto:digitalisation@ofgem.gov.uk)

Dear Liam

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

Thank you for the opportunity to respond to this consultation. Ofgem gave clear directions to Distribution Network Operators (DNOs) throughout the 2019-2022 period on data policy, setting out in detail how DNOs would be obligated to comply with common data best practice standards and publish digitalisation plans. This approach has generally resulted in DNOs raising levels of data provision and making that data more accessible and searchable in advance of the start of RIIO ED2.

There is still room for improvement. We note Ofgem's ongoing work in related areas such as the reform of the Long-Term Development Statement (LTDS) and the current call for input on the Future of Distributed Flexibility.

DNOs must accelerate cooperation on digitalising and standardising processes ahead of the mass uptake of low carbon technologies – such as those required for the installation of electric vehicle charging points and heat pumps in domestic properties. The Digital Best Practice (DBP) Guidance requires DNOs to “learn and deliver to the needs of current and prospective data users.” Where DNOs are cooperating with each other within Energy Networks Association (ENA) groups to standardise approaches, the ENA must also engage with stakeholders to update on progress and ensure the outputs meet user needs.

Overall, we welcome Ofgem's proposed changes and provide further comments in response to the consultation questions below. We do not answer all questions and have grouped some together.

Finally, we note that the new proposed DBP Guidance wording removes Ofgem's commitment to follow the guidance itself. We hope that Ofgem has recorded elsewhere its commitment to follow the same standards for data and digitalisation.

**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?**

Yes. Listing the intended outcomes makes it clearer to licensees and stakeholders what meaningful compliance looks like and what it delivers.

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

We support the wording. The wording provides a plain English explanation of what meaningful minimum compliance looks like.

**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?**

We support the use of Dublin Core as the Metadata standard. We're not responding to questions 4-8 as we are not proposing an alternative and are not a licensee.

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

We support the publication of a Data Catalogue, importantly in a location available to all Data Users, as a way of improving the discoverability of Data Assets.

Good discoverability is essential to us – for example when searching for data to inform our choice of location for investments in new low carbon and flexible generation assets. As described in the consultation document, it's more efficient for both licensees and users if users have automatic access to data rather than having to request individual data items from licensees. In instances where I've had to request underlying heatmap data from electricity DNOs it's been provided promptly, but this was an unnecessary step when other DNOs make the data downloadable to all.

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

We agree with the proposed position, provided that the data of individual consumers is protected. Ofgem says that it is satisfied that its position is compliant with the obligations that protect disaggregated smart meter consumption data and describe the conditions required for its release - we are not challenging that position.

**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?**

We agree with Ofgem's position.

**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?**

We support this.

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

The consultation defines this more precisely as “Data Assets generated through flexibility market operation are Data Assets for which the licensee is the Data Custodian”. The consultation then gives examples of the type of Data Assets that could be included as:

- Bids submitted for flexibility market tenders
- Bids accepted for flexibility market tenders and
- Utilisation of assets contracted within flexibility markets.

The examples listed are typical of Data Assets published by National Grid ESO on its Open Data Portal in relation to the operation of its balancing service markets (as noted in paragraph 1.115 of the consultation). We support the same information being published in flexibility markets used by DNOs.

DNOs publishing this information will help us understand the market. The DNO providing visibility of the merit order in which flexibility has been dispatched will also help mitigate against any real or perceived DNO conflicts of interest.

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

No. There should be a route for market participants to challenge decisions under Open Data Triage, but as stated in our response to Q13, we expect DNOs to provide an equivalent level of transparency on flexibility market operation as that provided via National Grid ESO on its Open Data Portal.

I hope you find this response useful. If you would like to discuss anything in further detail, please contact me at [helen.stack@centrica.com](mailto:helen.stack@centrica.com).

Yours sincerely

Helen Stack  
Centrica Regulatory Affairs, UK & Ireland