

14 April 2021

Liam Bennett  
Office of Gas & Electricity Markets (OFGEM)  
10 South Colonnade  
Canary Wharf  
London  
E14 4PU

Dear Sir,

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

As you are aware Energy Networks Association (ENA) is the industry body representing the UK's electricity and gas transmission and distribution networks operators.

Our response to the above consultation is provided on behalf of our DNO Member Companies and is not considered confidential. This response is limited to questions 10 to 12 relating to smart meter data. Our comments are submitted in support of any individual submissions that have been provided by our members.

The consolidated responses to Questions 10 to 12 are set out in Appendix 1 below.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Paul McGimpsey', is written over a light blue horizontal line.

**Paul McGimpsey**  
**Director Markets & Regulation**

Delivered via email to [digitalisation@ofgem.gov.uk](mailto:digitalisation@ofgem.gov.uk)

## APPENDIX 1 – Consolidated DNO Responses to Questions 10-12

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

ENA's DNO members agree that it is reasonable for aggregated smart meter consumption data to be treated as Energy System Data. The data has the potential to be a valuable resource providing insight into the electrical energy carried by 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 previously not considered or yet developed.

It is important to recognise that each DNO has its own Ofgem approved Data Privacy Plan that is unique to each organisation and its network, with differences as to how consumption data is collected and anonymised. Our members believe that to effectively share consumption data it will require a common standard with a level of regulatory mandate and intervention.

However, our members note that Ofgem in their MHHS Decision Document dated 20 April 2021, para 6.12 advising on the merits of daily data over monthly data, states 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. Some of our members consider that reviewing Standard Licence Condition 10A (SLC10A) to allow access to daily level of aggregated data, instead of monthly level aggregated data, 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. Since SLC10A came into effect the Data Protection Act 2018 and General Data Protection Regulation (GDPR) have been introduced and the obligations placed on our DNO members by this legislation should provide the necessary safeguards and protections for consumers.

### **Q.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?**

Some of our members consider that this is achievable, providing that they are only required to share the data they have in their possession and are not required to retrieve additional data where they do not see a positive business case to do so.

However, the majority of our DNO members do not agree that publishing the data, in a non-interoperable fashion, by 14 October 2023 is reasonable. Most DNOs consider that it would not be appropriate, necessary, nor in the interests of the energy sector and consumers, that they make the necessary changes, which would include significant system developments, to make consumption data available for publication in a non-interoperable fashion by 14 October 2023.

To publish the Data Asset by 14 October 2023 would require each DNO to make changes to their Data Privacy Plan (DPP) and make changes to the associated documentation which supports their plan. The supporting documentation set 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 a DNO's control. A revised Data Privacy Plan 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 DNO.

The DNOs also consider that the penetration of smart meters, that they can communicate with, in their regions is still not at sufficient levels. There are also some technical challenges that remain in the CSP-N region which pose a barrier to the DNOs in that region accessing consumption data in an effective and reliable way. This means that these DNOs are not collecting significant volumes of smart meter consumption data to be able to share in the short term and there are material changes taking place across the Data Communications Company (DCC) smart meter infrastructure in order to maximise the success of requests for consumption data. The changes by DCC will take time to complete and require DNOs to make their own system changes.

These DNOs therefore consider that publishing the Data Asset by 14 October 2023, in a non-interoperable fashion, is not the right approach. Our members would prefer that the industry focuses efforts on resolving existing data access issues, so that consumption data is accessible by DNOs, before being distracted by making process and system changes 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, and then publishing, interoperable data.

**Q.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?**

Our members agree that if smart meter consumption data is Energy System Data, then it would be helpful for external stakeholders if that information were interoperable. However, in the context of smart meter consumption data our members will need to be clear on the precise meaning of 'interoperable' and we will be looking to reach a common understanding of this term across all stakeholders to help ensure that any outcomes are fit for purpose.

The prospective uses of aggregated consumption data are to some extent unknown. Therefore, to develop an interoperable methodology our members will also need to have a greater understanding of all the prospective uses for aggregated consumption data. For example, DNOs typically aggregate data depending on network topology e.g., at distribution substations and feeders. Clarity is also required on whether 'interoperable' relates simply to the presentation of the information or also in the assumptions that underpin the aggregation process, for example in relation to missing or unobtainable data, treatment of data from three phase meters etc.

Provided that there is clarity on the interpretation of interoperability, and depending on the implications associated with that clarity, we believe that 6 months from the date of a decision by Ofgem should be sufficient time to develop an interoperable methodology across all DNOs.

As part of the work to develop an interoperable methodology consideration should be given to the following aspects:

- Identifying the process and IT systems changes that would be required to implement a common methodology.
- Identifying the timescale and costs of making such changes.
- Whether there is additional supporting data associated with aggregated consumption data that would need to be published so that external stakeholders could interpret the published data. It is important that stakeholders are aware of assumptions made during the aggregation process and the limitations of the data set, for example where only a partial data set is accessible.
- The need or otherwise to develop a common DPP, and the timescale to develop, and have approved, a common DNO DPP.

We are aware that IDNOs currently have limited obligations regarding smart metering, and we wonder what the implications of this are in relation to making aggregated consumption data publicly available.

In conclusion, the proposal for determining an interoperable methodology by 28 February 2024 seems reasonable and is supported by our members, subject to the above considerations. However, our members consider that implementing the methodology and publishing Consumption data by 28 February 2024 is likely to be a challenge and clarification should be provided to confirm if this is the intent.