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Liam Bennett
Energy System Data Regulation Team
Ofgem

By email to digitalisation@ofgem.gov.uk

11 April 2023

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 the above consultation on updates following the Call for Input last year on the Digitalisation licence condition.

We appreciate Ofgem's suggested updates to the Data Best Practice Guidelines in particular, by providing specific guidance on standardisation for Metadata and Open Licencing.

We have responded to questions where we can add value, but should you require any further information with regards to our response then please do not hesitate to contact me at david.handley@sgn.co.uk.

Yours sincerely,

David Handley
Director of Regulation & Strategy
SGN



Chapter 2: Changes to the design approach of Data Best Practice Guidance

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?

SGN welcomes the overall principle of further clarification provided by introducing Intended Outcomes statements.

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

Additional clarification around expectations on how compliance is to be achieved by Licensees would be appreciated. This should be a point of consultation, as it will depend on the existing level of maturity and scope (as some will require iterative activities, and others will have interdependencies across networks).

As an example, Principle 3 is for 'Metadata standards to be applied to Data Assets'. This will require a lot of iterative work to bring in metadata, review and apply the standards, and consult with other networks on the alignment of those standards.. In practice SGN have approximately 200 data repositories, and several thousand data sets and this is likely to be replicated on a similar scale across other licensees. Implementing this will therefore be a time consuming and iterative process as the scope of Data Assets evolve and change.

Chapter 3: Data Best Practice Guidance and Digitalisation Strategy and Action Plan Guidance scope and content

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 appreciated that Ofgem have provided specific direction regarding a Metadata standard.

However, Dublin Core does have recognised limitations according to datatype specifically it is not recognised as the appropriate standard for Geospatial Data.

It would be helpful if Ofgem could provide equivalent direction for geospatial data. Similarly, there may be further data types where alternative metadata standards would be more appropriate, and it would be helpful to have a clear process through which these alternative standards can be agreed and socialised as appropriate.

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

Dublin Core metadata standard is appropriate for structured data. However, as we set out above in Q3 it is recognised that it has limitations.

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?

SGN has adopted Dublin Core and has published this as an internal standard. SGN has applied this specifically to the Open Data set published March 2023.

The timescale for applying this to further SGN Data Assets will be ongoing and iterative.



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?

SGN welcomes the inclusion of Creative Commons (CC) Attribution Licence or Open Government Licence (OGL) as the standard. At this time, we do not think that there is sufficient data to determine which solution should be implement as the industry standard – whether either one or both. In order to migrate towards a common standard at a later date, it is important that there is consistency in the licence templates that are adopted.

Ofgem has stated CC ‘Attribution’, but under Creative Commons there is also the ability to include CC ‘Share-Alike’ i.e. downstream sharing of the data is also maintained on an open data basis. We consider there to be benefits associated with CC ‘Share-Alike’ and would support its inclusion in the consultation.

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?

SGN has no additional comment to add on this

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?

SGN has already adopted an Open Licence based on Created Common Attribution & Share-alike Licence and included this with the open data set published March 2023.

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

This is a significant new requirement and will require new processes and activities to be carried out to ensure that the Public Data Catalogue is consistent with the internal Data Catalogue.

SGN has a data catalogue platform and is putting in place appropriate governance controls for internal access and use in line with SGN’s security policies.

It will be important for Ofgem to clarify their expectations on the ‘publication of a Data Catalogue’ as there is no additional supporting information included for this particular requirement. Our view is that a read-only.pdf type document/spreadsheet is appropriate as a public version of a Data Catalogue, to provide an active document would be significantly more challenging and come against system constraints that would need to be resolved. It is important to recognise that Licensees should ensure that only appropriate Data Assets are included on the Public Data Catalogue and the Triage Assessment be applied.

Chapter 4: Energy System Data and its application

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

For the avoidance of doubt gas networks do not currently utilise or subscribed to the DCC smart meter data services. As such we do not have a position on this question.

Given this, it is important that Ofgem clarifies that the aggregated smart meter data proposed to be included refers to Electricity data only at this time.



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?
SGN has no additional comment to add on this.
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?
SGN has no additional comment to add on this
Q13.What are your views on our proposal that licensees treat Data Assets associated with flexibility market operation as Presumed Open?
Not considered relevant to gas networks at this time.
Q14.Do you foresee any specific barriers to treating Data Assets associated with flexibility market operation as Open Data?
SGN has no additional comment to add on this