



Data Best Practice Principles and Digitalisation Strategy and Action Plan Guidance

Northern Powergrid's response to Ofgem's consultation on the Data Best Practice Principles and the Digitalisation Strategy and Action Plan Guidance

Responses to consultation questions

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?

1.1. Northern Powergrid is supportive of the structural change to the DBP guidance.

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

2.1. The purpose behind the proposed wording of the intended outcomes for each principle in the DBPG is appreciated. The choice of words and phrases for example “**all Data Assets** for which the licensee is the **Data Custodian**” needs moderation to ensure scope is practicable to deliver and is an effective tool to make relevant data available in a manner that satisfies the overarching objectives without being burdensome. Ofgem may wish to restrict Data Asset to Energy System Data only for the following reasons:

- i. The use of the phrase “All Data Assets” introduces scope that is unbounded and may divert attention from data that can usefully support transition to Net Zero and DSO.
- ii. The word Data Custodian, and perspective of its use, needs clarification because data custodian is used where data controller is meant (Data Controller is a defined term used in GDPR to recognise controller of personal data).

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?

3.1. The proposal to use Dublin Core is, in principle, supported.

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

4.1. Not applicable as we agreed with the proposal in Q3

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?

5.1. Whilst Northern Powergrid have declared compliance with the current version of the DBPG, we will require a minimum of 36 months to catalogue all Data Assets using Dublin Core as our metadata standard. We also believe that our current metadata is conformant with DCAT, a widely adopted implementation of the Dublin Core suite of standards. The two primary barriers are likely to be:

- i. **People:** the headcount requirements identify all data assets, and prepare metadata, triage, and publish.
- ii. **Technology:** Finding a tool that is fully compliant with Dublin Core Metadata standard. OpenDatasoft portal that Northern Powergrid uses is assessed to be conformant with DCAT but not compliant with Dublin Core.

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?

6.1. Northern Powergrid supports the use of the Open Government Licence (OGL) and is our preference as it has been subject to rigorous review by our legal representatives, is already approved and in use within Northern Powergrid.

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?

7.1. Not applicable as we agreed with the proposal in Q6

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?

8.1. Northern Powergrid believes it is already compliant with this requirement because data is published under the Open Government License available through OpenDatasoft portal.

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

- 9.1. Whilst Section 5 of the proposed DBPG discusses the obligation for licensees to make data discoverable through Data Catalogues, it does not use the term “all Data Assets”, however Northern Powergrid has interpreted that Section 5 will relate to “all Data Assets” and as such, has concerns with the unbound nature of this term. This is discussed in our response to Question 2 of this consultation and urges Ofgem to restrict the definition of Data Asset to Energy System Data only.
- 9.2. Taking 9.1 into account, Northern Powergrid is supportive in principle of licensees creating and publishing a Data Catalogue of Data Assets as proposed under Section 5, but would expect this to be an iterative process, adding items to the data catalogue based on stakeholder need, once they have been assessed using the ENA Data Triage process.

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

- 10.1. We agree with the position on the treatment of smart meter consumption data as Energy System Data. We feel that sharing this data in an aggregated format, with appropriate data privacy and security arrangements in place, could provide opportunities for organisations within the energy sector to benefit consumers by offering services and products previously not considered or yet developed.
- 10.2. That said, there needs to be clarification on how treating aggregated half-hourly electricity consumption data as Energy System data relates to existing obligations, which could be in direct conflict, such as the security compliance obligations within the Smart Energy Code and Standard Licence Condition 10A.
- 10.3. Aggregated consumption data from smart meters has the potential to be a valuable resource providing insight into the electrical energy carried by distribution systems, and we agree that it is reasonable for this to be considered as Energy System Data.
- 10.4. As an alternative to removing the restriction in SLC10A Limitations on license consumption which prevents accessing data with more granularity than monthly (which would help overcome some of the practical difficulties associated with the CSP N system), we think that it would be appropriate to review SLC10A completely with a view to removing the need for DNOs to have a DPP on the basis that the provisions of the DPA and GDPR, which postdates the implementation of SLC10A, would provide sufficient safeguards for consumers.
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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?

11.1. Whilst Northern Powergrid appreciates the value of publishing the Energy System Asset Data relating to the Smart Meter programme, its publication in non-interoperable fashion by 14 October 2023 is not practicable due to the following reasons:

- i. The Data Privacy Module to meet the requirements of our Data Privacy Plan (DPP) is not expected to be operationally live until early 2024, subject to satisfactory tests with DCC and no requirement to change DCC and secure regulatory approvals.
- ii. Northern Powergrid's smart meter programme, similar to that of other DNOs, will not be fully implemented by this date.
- iii. There would be a need to update our Data Privacy Plan (DPP) and the associated non-trivial documentation.

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?

12.1. We agree that if it is decided that smart meter consumption data is considered to be Energy System Data, then it would be helpful for external stakeholders if that information was interoperable. However, in the context of smart meter consumption data we are uncertain what 'interoperable' means and we think this needs more consideration.

12.2. We understand that the prospective uses of aggregated consumption data are to some extent unknown, however it would be helpful to understand the types of prospective uses when developing an interoperable methodology, so that the methodology could be developed with prospective uses in mind. 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.

12.3. Provided 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 could be a reasonable period of time to develop an interoperable methodology across DNOs.

- 12.4. As part of the work to develop an interoperable methodology, consideration should be given to the following aspects:
- i. Identifying the process and systems changes that would be required to implement a common methodology.
 - ii. Identifying the timescale and costs of making such changes.
 - iii. Whether there is additional supporting data associated with aggregated consumption data 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.
 - iv. The need or otherwise to develop a common DPP, and the timescale to develop, and have approved, a common DNO DPP.

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

- 13.1. This proposal supports the overall objectives of DSO to promote and enable flexibility markets, as such we broadly support the proposal.
- 13.2. The expectations on the timeliness and detail of data published must be proportionate to the benefit that the data delivers to the open market.
- 13.3. The practical implementation of the principle of Presumed Open for data assets associated with flexibility market requires fuller consideration and agreement by all actors and where required, investments to meet stakeholder needs.

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

- 14.1. Data published by all 'Market makers' must be provided in a consistent format to allow comparability across market opportunities for there to be value in this. As noted in the proposal appropriate mitigation must be applied; including the data triage which will continue to develop in consultation with our stakeholders.
- 14.2. The barriers to treating flexibility market data are envisaged to be capacity and investments considering the standards that compliance to DBPG would require.
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