

14th April 2023

Mr Liam Bennett
Senior Manager – Energy System Data Regulation
Energy Systems Management and Security
UK Government Hub Wales
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CF10 1EP

Dear Liam:

Northern Gas Networks response to Ofgem Consultation: Updates to Data Best Practice Guidance and Digitalisation Strategy and Action Plan Guidance

Thank you for the opportunity to respond to this consultation. Northern Gas Networks (NGN) welcomes the opportunity to provide feedback on the proposed updates to the Data Best Practice Guidance and Digitalisation Strategy and Action Plan Guidance.

We recognise the importance of the DBP Guidance as an enabler to releasing the full potential of energy system data, and we wholly support the updates proposed.

Our response to the questions that you have raised in your consultation are provided in Appendix 1.

We look forward to working with Ofgem in delivering the benefits of open energy system data. Should you wish to discuss our response to this consultation in more detail, please do not hesitate to contact me at tpollock@northerngas.co.uk.


Kind Regards



Tom Pollock | Head of Data & Digitalisation
Northern Gas Networks

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Appendix 1 – Northern Gas Networks Consultation Response

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?

Northern Gas Networks welcomes the proposal, and fully supports the introduction of intended outcomes for each of the Data Best Practice Guidance principles. We look forward to collaborating closely with Ofgem and other licensees to further improve the Guidance as we all work together to optimise the use of energy data. As there is a measure of compliance that is being applied to each of the principles, with the potential for formal enforcement action should Ofgem assess that a licensee is non-compliant, the definition of compliance needs to be clear and well-understood by all parties. The examples and techniques provided in the 'Data Best Practice Supporting Information v1.1' are useful, however, whilst we recognise that this supporting information is not part of the Guidance, it is unclear whether Ofgem consider the examples and techniques they have given in the supporting information to be an indication of the minimum level of compliance. In some cases the intended outcome of a principle simply states that a licensee 'can demonstrate' compliance with a principle. This requires the principle itself to be very clear and unambiguous. This is especially important in principles relating to data security. Principle 9 states 'The licensees must ensure adherence to relevant regulations, and legislation in relation to cyber security.' The intended outcome for this principle states 'The licensee can demonstrate how its Products and Services are developed in compliance with the current regulations and legislation relating to cyber security.' Given the importance of cyber security and the oversight already provided by Ofgem on this, it would be beneficial to further clarify what is required to demonstrate compliance and whether this assessment will be carried out by the Digitalisation Team or by Ofgem's Cyber Security team. Any data that relates to the location, operation, configuration or security of NGN assets in scope of NIS would not be presumed as open. Any information relating to these assets shared outside of NGN, would be treated at a TLP of Red or Amber.

Principle 5 states 'The licensee must ensure that any potential Data Users can identify the Data Assets that the licensee is the Data Custodian of, and how Data Users can pursue access to these Data Assets. The licensee must ensure that the Metadata associated to Data Assets is discoverable to Data Users, subject to the outcome of an Open Data Triage process. Data Assets should be made discoverable through a Data Catalogue.' The intended outcomes for this principle are 'The licensee has a Data Catalogue in a location accessible to Data Users. The Data Catalogue states access levels for different types of Data User. The licensee publishes Metadata through their Data Catalogue allowing users to identify the contents of Data Assets.' It would be beneficial to clarify the minimum requirements of the data catalogue (beyond the metadata headings), minimum requirements in terms of access levels (for example around Identity & Access Management), and other supplementary activities that Ofgem would reasonably expect a compliant licensee to carry out; for example whether Ofgem would expect to see a risk register for open data, and if so what the minimum requirements for that register would be.

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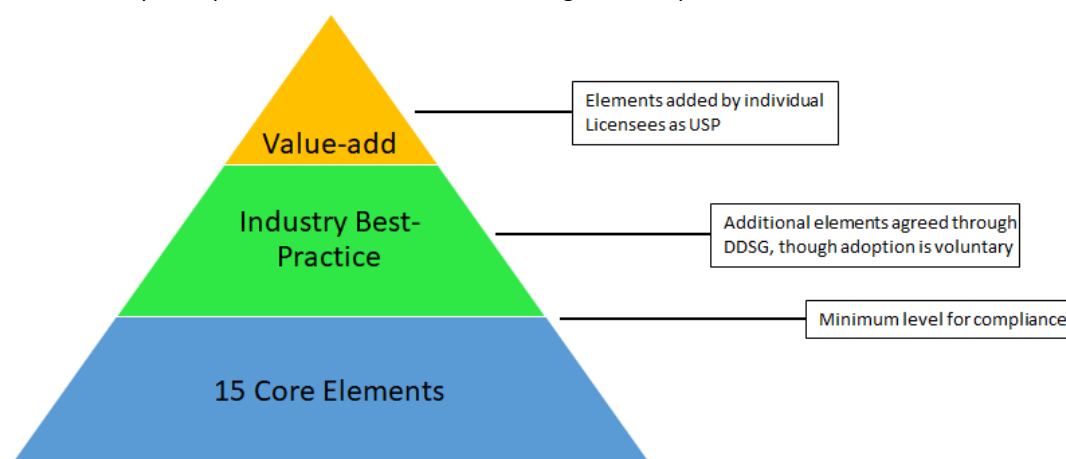
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Q2. What are your views on the proposed wording of our intended outcomes for each principle in DBP Guidance?

In addition to the observations given in the response to Q1, Northern Gas Networks believes that it would be beneficial for all parties if several of the definitions given for terms used throughout the Guidance were further clarified. For example 'Data Users' has the broad definition of 'An organisation or individual which utilises data held by a Data Custodian for any reason.' It would be useful if this could be expanded to include an indicative (though not exhaustive) list of users.

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?

Northern Gas Networks welcomes and wholly supports the proposal to require the use of Dublin Core as the Metadata standard. It would be beneficial in the principles involving the use of Dublin Core, that further clarification is given on what is required to demonstrate compliance. As is stated in the supporting information, Dublin Core has a large number of elements, with 15 of them considered as core elements. We suggest that the requirement to adopt the 15 core elements should be added into the intended outcomes. As well as mandating the adoption of the core elements, Ofgem may want to encourage licensees to collaborate to build an 'Industry best-practice' set of elements, although the adoption of these should not be mandatory.



Dublin Core is a well-established, industry-agnostic standard, and will answer the majority of the requirements for Open Energy data.

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

Not applicable, Northern Gas Networks agrees with the proposal to require the use of Dublin Core as the Metadata standard.

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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?

Northern Gas Networks has already adopted Dublin Core as our Metadata standard. We estimate the timescale to fully implement this standard across the organisation to be c.15 months.

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?

Northern Gas Networks welcomes and wholly supports the proposal to require the use of the Creative Commons Attribution Licence or the Open Government Licence as the standard open data licence.

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?

Not applicable, Northern Gas Networks agrees with the proposal to require the use of the Creative Commons Attribution Licence or the Open Government Licence as the standard open data licence.

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?

We estimate the timescale to fully implement the open data licence across the organisation to be c.12 months.

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

Northern Gas Networks welcomes and wholly supports the proposal to require the creation and publication of a Data Catalogue.

As per our response to Q1, Principle 5 states 'The licensee must ensure that any potential Data Users can identify the Data Assets that the licensee is the Data Custodian of, and how Data Users can pursue access to these Data Assets. The licensee must ensure that the Metadata associated to Data Assets is discoverable to Data Users, subject to the outcome of an Open Data Triage process. Data Assets should be made discoverable through a Data Catalogue.' The intended outcomes for this principle are 'The licensee has a Data Catalogue in a location accessible to Data Users. The Data Catalogue states access levels for different types of Data User. The licensee publishes Metadata through their Data Catalogue allowing users to identify the contents of Data Assets.' It would be beneficial to clarify the minimum requirements of the data catalogue (beyond the metadata headings), minimum requirements in terms of access levels (for example around Identity & Access Management), and other supplementary activities that Ofgem would reasonably expect a compliant licensee

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to carry out; for example whether Ofgem would expect to see a risk register for open data, and if so what the minimum requirements for that register would be.

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

Northern Gas Networks would like confirmation that this position only applies to Electricity DNOs, not GDNs as we are not DCC Gateway users and do not have access to smart meter consumption data.

As a Data User we welcome and wholly support the proposed position on treating aggregated smart meter consumption data as Energy System Data.

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