Ofgem Consulation Response

Data Best Practice Guidance and Digitalisation Strategy and Action Plan Guidance

11/04/2023

Electricity Distribution

nationalgrid

Approval

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Document Revision & Review

Date	Comments	Author
11/04/2023	Draft released to Reviewers for comments	Ryan Kavanagh
14/04/2023	Final Draft	Ryan Kavanagh

Document Submission

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1. 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?
• Yes, we fully support the proposal to update the structure of the Data Best Practice Guidance and supporting information documentation.   • We think that the provision of guidance for the 11 principles will help initiate the development of industry standards around Energy System Data.   • The provision of the proposed additional guidance for the Data Best Practice Guidance should ultimately further help Energy System Stake Holders and Data Users access, understand and use similar data sets which have been produced by different licensees.   • In the absence of a formally defined standard for 'Data Best Practices', providing additional clarity on the intended outcomes should help align licensee interpretations.   • Whilst we support the proposed changes to the Data Best Practice Guidance we would like to understand if Ofgem expect the intended outcomes to transition to mandatory requirements, and if so in what time scales.

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

Using the link below to review the proposed wording for the 'Intended Outcomes' for each principle of the Data Best Practice Guidance document:

https://www.ofgem.gov.uk/sites/default/files/2023-02/Track%20Changes%20Data%20Best%20Practice%20Supporting%20Information%20v1.1%20for%20consultation.pdf

NGED review and comments as follows:

Principle 1: Identify the roles of Stake Holders of Data Assets

- We support the proposed wording no further comment.

Principle 2: Use common terms within Data Assets, Metadata and supporting information

- We support the proposed wording no further comment.

Principle 3: Describe data accurately using industry standard Metadata

- Further clarification could be provided, is Dublin Core to be the minimum standard?
- NGED already implement this.

Principle 4: Enable potential Data Users to understand the Data Assets by providing supporting information

- We support the proposed wording no further comment.
- NGED already implement this.

Principle 5: Make Data Assets discoverable to potential Data Users

- We support the proposed wording no further comment.

Principle 6: Learn and deliver to the needs of current and prospective Data Users

- We support the proposed wording no further comment.

Principle 7: Ensure data quality maintenance and improvement is prioritised by Data User needs

- Assessment of data quality is a continual process – we would suggest the wording of 3.77 should be " The licensee has a log of **known** data quality issues detailing how these issues were, or will be, resolved"

Principle 8: Ensure Data Assets are interoperable with Data Assets from other data and digital services

- We support the proposed wording no further comment.

Principle 9: Protect Data Assets and systems in accordance with current regulations and legislation relating to cyber security

- Intended outcome 3.108 only refers to cyber security. We believe the licensee should also be required to demonstrate compliance with Data Privacy legislation and any relevant data resilience industry standards.
- NGED already complies with cyber security legislation and standards.

Principle 10: Store, archive and provide access to Data Assets in ways that ensures sustained benefits

- We support the proposed wording no further comment.

Principle 11: Treat all Data Assets, their associated Metadata and Software Scripts used to process Data Assets as Presumed Open

- We support the proposed wording no further comment.
- NGED already implement an Open Data Licence and publishes details about this licence.

2. 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?

- NGED fully support the use of the Dublin Core Metadata Standard and we have adopted it for the past 2 years now.

- In our opinion, adopting common standards for Metadata is equally important as defining descriptive standards for the actual data set (such as the usage of data dictionaries).

- We understand that the Dublin Core Metadata Standard is widely adopted across many industries. We see this as a positive as it means Stake Holders and Data Users are more likely to be familiar with this standard, its format and descriptive elements.

- We believe the Dublin Core Metadata Standard is suitable for the industries current needs.

- We also recognise that in the future that it may be necessary to develop an extension to the Dublin Core Metadata Standard which is tailored to meet the needs to the energy Industry. As such we would recommend that the suitability of the Dublin Core Metadata standard for the Energy Industry is periodically reviewed. Governance of the Metadata standard is needed to ensure the standard continues to be fit for purpose and is able to evolve to meet Data User's requirements.

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

- NGED agrees with the proposal to adopt the Dublin Core Metadata Standard. However, as stated in our response to Question 3 of this consultation, we would recommend that the suitability on the Dublin Core Metadata standard for the Energy Industry is periodically reviewed and is supported with appropriate governance.

- As stated in our response to Question 2 of this consultation, is Dublin Core the minimum standard? Could other Metadata Standards as well as the Dublin Core Metadata Standard be provided if appropriate or as requested/suggested by Stake Holders?

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?

- NGED have already adopted the Dublin Core Metadata Standard. We have been utilising this standard on our Connected Data Portal for over 2 years now.

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?

- NGED supports the requirement for licensees to adopt a standard open data licence as this will make it easier for Data Users to interpret and hopefully increase the usage of published datasets.

- Currently NGED have an Open Data Licence which is based on the Open Government Licence v3.0. It would be low effort for us to adopt the exact Open Government Licence.

- We fully support the mandated usage of Open Government 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?

- As stated in our response to Question 6 of this consultation, we fully support the usage of an open data licence and already have one in place for our published data sets which is based on the Open Government Licence v3.0.

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?

- NGED have already adopted an open data licence which is based on Open Government Licence v3.0. We have been an open data licence for almost 2 years now.

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

- We support the requirement for licensees to create and publish a Data Catalogue for their Data Assets.

- We believe this will provide value and increased usage of Data Assets for both external and internal Data Users and Stake Holders.

- We believe a Data Catalogue will be important for the future development of Asset Registers, Digital Spine and other data systems and stores to be developed to Data Users and deliver Net Zero.

- A Data Catalogue should also include accompanying Metadata, data dictionaries, and data licences for data sets.

- We also believe that Data Assets would be more discoverable with a Data Catalogue and we also believe all Data Assets should be discoverable for Data Users and Stake Holders.

- There should be clear guidance on what the minimum requirements of a Data Catalogue are.

- A suitable refresh frequency for the Data Catalogue should be determined by a Cost Based Analysis (CBA) to balance costs for customers and value provide to Data Users. An approach to this is already be covered by the ENA Data Triage Playbook.

3. 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?

The Energy Networks Association (ENA) are providing a join response to Questions 10, 11 & 12 of this consultation on behalf of all Smart Meter Steering Group (SMSG) members. National Grid Electricity Distribution (NGED) is a supporting and contributing member to the SMSG, and as such, our position and response to this question is fully represented by ENA's consolation response.

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?

The Energy Networks Association (ENA) are providing a join response to Questions 10, 11 & 12 of this consultation on behalf of all Smart Meter Steering Group (SMSG) members. National Grid Electricity Distribution (NGED) is a supporting and contributing member to the SMSG, and as such, our position and response to this question is fully represented by ENA's consolation response.

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?

The Energy Networks Association (ENA) are providing a join response to Questions 10, 11 & 12 of this consultation on behalf of all Smart Meter Steering Group (SMSG) members. National Grid Electricity Distribution (NGED) is a supporting and contributing member to the SMSG, and as such, our position and response to this question is fully represented by ENA's consolation response.

Q13. What are your views on our proposal that licensees treat Data Assets associated with flexibility market operation as Presumed Open?

- We welcome these proposals and see the value in creating clear and transparent market information. We would add the requirement to publish clear data on the volumes offered for Flexibility Market Tenders.

- We are already required to publish the suggested data (Bids submitted for flexibility market tenders; Bids accepted for flexibility market tenders; and Utilisation of assets contracted within flexibility markets.) as part of our Distribution Flexibility Services Procurement Report as per Licence Condition 31E. We are looking to engage with Ofgem to improve the process and make the data as accessible as possible.

- We support and agree that 'Data Assets' associated with flexibility market operation should be Presumed Open. However the 'Presumed Openness' of the data is dependent on the procurement status of the associated flexibility services. For example submitted bids for the provision of flexibility services should not be Presumed Open until the tender and procurement process is complete as this could enable market gaming. Once the flexibility services have been procured, data relating to bids, procurement and operation can be Presumed Open.

- The Procurement Report is a yearly process which we see as the minimum standard and are working to more regular updates. Ultimately we would like data to be published as close to real time as possible (post market clearing). We are in currently developing capabilities for more regular data uploads.

- We already build in the ability to share this information in our service terms.

- This should be pushed across the whole market for flexibility including the ESO and if possible wholesale markets (where such data is currently behind a paywall).

- NGED's data triage process will be used to identify any information which may not be defined as Open.

Q14. Do you foresee any specific barriers to treating Data Assets associated with flexibility market operation as Open Data?

- We do not foresee any major barriers to the proposal.

- We support and agree that 'Data Assets' associated with flexibility market operation should be Presumed Open. However the 'Presumed Openness' of the data is dependent on the procurement status of the associated flexibility services. For example submitted bids for the provision of flexibility services should not be Presumed Open until the tender and procurement process is complete as this could enable market gaming. Once the flexibility services have been procured, data relating to bids, procurement and operation can be Presumed Open.

- Due to the expected volumes of flexibility service procurement and operation across the RIIO ED2 period, we anticipate that a complementary IT system and data store would be required to meet data reporting and access requirements to reach a fully 'Open Data' standard.

- We are in the process of building the systems to support more regular uploads of data as requested in 1.119. These are currently scheduled for completion in the next 12 months, but are subject to the standard risks associated with IT project delivery.

- There is a heavy dependency on Ofgem's consultation on the Future of local energy institutions and governance, as some elements of flexibility market operation may be undertaken by different institutions under different operating models. We would expect to see the same approach to Open Data embraced under all models, with the requirements to publish Open Data being discharged under different licences and against different entities, depending on the model adopted.

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