

Liam Bennett
Ofgem
10 South Colonnade
London
E14 4PU
By email to: digitalisation@ofgem.gov.uk

Electricity North West
Hartington Road, Preston,
Lancashire, PR1 8AF

Email: enquiries@enwl.co.uk
Web: www.enwl.co.uk

Direct line: 07710 069573

Email: steve.cox@enwl.co.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 this consultation. It is helpful to understand Ofgem's latest thinking in this ever more vital area enabling the transition to Net Zero and also important that stakeholders can contribute to the development of this piece of work.

Data and digitalisation are a crucial component of Electricity North West's RIIO-ED2 Business Plan, as we strive to improve efficiency, drive innovation, increase transparency, and support the transition to Net Zero. The growing importance of technology requires us to bolster cyber protection and the resilience of our network to reflect the bigger role of electricity in all our lives and an increasingly hostile "cyber" world. We aim to be leaders in these areas amongst the other network operators in the UK, for example we have the most advanced network management system in the sector.

We have implemented the recommendations of the Energy Data Taskforce and Ofgem's Data Best Practice around openly sharing our data for the benefit of society. A great example of this is our new Open Data Sharing Portal and our first public API (Application Programming Interface) (<https://electricitynorthwest.opendatasoft.com/>).

We welcome the proposed updates to the guidance, which are largely in-line with our existing ways of working. Within our responses to the specific consultation questions (in the appendix to this letter) we have set out some areas where we think additional clarification could be helpful, to define both the scope of these changes and acceptable methods for demonstrating compliance.

A key section to highlight is the questions concerning the publication of smart meter consumption data. Whilst we support publishing the data we currently hold, relating to distribution system assets; we believe it is important that any requirement relates solely to data collected and held under a justified business need and is not misinterpreted as a steer towards collecting and storing additional data.



We look forward to further engagement with Ofgem on this and to the publication of stakeholder's responses to this consultation.

Please contact me if you would like any further information on our response.

Yours sincerely,

Steve Cox
Asset & Technology Director

Appendix – Response to specific consultation questions

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?

We support the proposal. We would welcome the inclusion of worked examples of processes/artifacts that could be used to demonstrate compliance with each principal.

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

As above.

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?

We agree with the proposal to use Dublin Core as a metadata standard.

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

Not applicable.

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?

For our current Open Data, we are already compliant with the Dublin Core standards.

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?

We support the proposal and are implementing the Creative Commons Attribution Licence version CC BY (4.0).

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.

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?

Implementation is in progress, to be completed within a week.

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

We agree with this proposal and expect it to make a substantial contribution towards improving the discoverability of Data Assets. We would welcome further clarification on the scope of this requirement and, specifically, the definition of a Data Asset in this context.

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

We agree with the proposal to treat aggregated smart meter consumption data as Energy System Data, in so far as that data relates to distribution system assets and we hold the data for the purposes of electricity distribution.

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?

We would be happy to publish aggregated smart meter data, relating to distribution system assets that we have already identified a business case for collecting and storing. We would be happy to do so in a non-interoperable format, by 14 October 2023. However, we would not want to be required to collect and store additional smart meter data for which we have not identified an appropriate business case as we expect this would impose additional costs on consumers, with uncertain benefits.

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?

We would be happy to work with the other DNOs to determine an appropriate interoperable format for the consistent publication of this data. Implementation timescales would depend upon the identified solution and how this relates to our current capability; this may mean different implementation timescales for each DNO.

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

We are happy with the proposal and already presume this data as Open. We believe we are already mandated to publish this information under SLC31E, within the Distribution Flexibility Services Procurement Report, published in April each year. SLC31E includes these three elements, plus additional fields. A standard template is provided for this. We would therefore welcome further clarification on any additional detail Ofgem is looking to capture through this change, outside of increased frequency of publication.

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

We currently use Piclo to procure services. The speed of publication will therefore be dependent on Piclo implementing any required changes to its website.