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Energy Systems Data Regulation Team  
Office of Gas and Electricity Markets  
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E14 4PU

By Email only: [digitalisation@ofgem.gov.uk](mailto:digitalisation@ofgem.gov.uk)

Dear Liam,

**Consultation on updates to Data Best Practice Guidance and Digitalisation Strategy and Action Plan Guidance**

The Data Communications Company Ltd (DCC) welcomes Ofgem's consultation on the above and is pleased to include a response.

At scale, the smart meter system will support secure messaging across 100m devices in 30 million homes, whilst offering consumers the ability to seamlessly switch energy supplier. As the organisation responsible for this technology infrastructure, we recognise the importance of a data access regime that is robust and secure yet sufficiently flexible to enable innovation and deliver public benefit.

There are now more than 25 million meters connected to our network and over one billion messages transactions take place over the smart metering system across Great Britain every month. Our network is already providing detailed and critical data needed to understand energy demand.

In addition, the data flows through smart meters generate 'system data' which if leveraged appropriately could unlock rich insight to help deliver public benefit and solve societal challenges, including accelerating the transition to net zero.

In line with national and sector specific policy, we have been working to explore how we can help organisations innovate with this dataset, providing maximum access robustly and securely, and at the lowest possible cost.

Given our stated policy position on promoting the innovative use of data, we have a significant interest in how the data is accessed, shared and utilised for public good.

We are voluntarily using some of the key principles of the DBPG through the development of our own data access initiative ([Data for Good](#)) and in participation in the Modernising Energy Data Applications competition. Overall, we are committed to data standards, information asset management, and the ethical and appropriate use of data.



DCC welcomes the proposed changes to the Data Best Practice Guidance (DBPG) and is supportive of Ofgem's proposal for the publication of de-personalised smart meter data, by DNOs as presumed open.

Our response, in summary, acknowledges that

- We see proposed changes to the principles as helpful in context with our ongoing voluntary use of the guidance in context with our own Data for Good initiative.
- We agree with proposals for licensees to publish smart meter consumption data as presumed open. We are on hand to provide support to maximise efficiency with technical data access and ensuring robust data privacy and cybersecurity approaches.
- We agree with Ofgem's ambition to treat flexibility market data as presumed open. We encourage further definition of this requirement in context with other industry activities (Ofgem's Call for Input on Distributed Flexibility, Smart & Secure Electricity System Programme etc).

We look forward to continued participation in associated industry activities. We are of course on-hand to provide any further information or respond to any questions you may have from this response.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'James Ringrow', with a stylized flourish at the end.

**James Ringrow**

Director of Strategy, DCC

## DCC's 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?**

We agree with proposals to introduce intended outcome for each principle. As a voluntary user of the guide, we believe this addition adds further clarity to the purpose of the principles.

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

Generally, we find the proposed wording sensible and a helpful addition to the DBP. We recognise that the wording of the proposed intended outcomes is specifically targeted at Licensees.

**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?**

Whilst not obligated under this guidance we have developed a framework for our own smart meter system data (with support from the Open Data Institute) using Dublin Core. It is well regarded as an easily understood and widely used metadata standard.

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

N/A

**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?**

N/A

**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?**

At this stage of progress with our own data access initiative, we have not assessed licencing models to enable open data access. We are however supportive of Ofgem's presumed open principle and maximising access to energy system data including smart meter data in an appropriate manner.

**Question 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?**

N/A

**Question 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?**

N/A

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

Whilst we recognise that this proposal is targeted specifically at energy networks, we are supportive of the approach. From a DCC perspective we recognise there to be limited understanding and awareness of the breadth of smart meter data asset information which holds the potential to inhibit innovation and product development.

We are in the process of developing a data catalogue of smart meter 'system data' assets (using the Dublin Core Metadata Standard) which we will seek to publish in line with our wider data access ambitions.

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

We agree with proposals to treat smart meter consumption data as Energy System Data. In alignment with the findings of the Energy Digitalisation Taskforce, which builds on the research of the Smart Meter Public Interest Advisory Group (of which DCC were a founding funder), we welcome the activities to increase access to and the utility of smart meter data.

We receive frequent enquiries from a diverse array of organisations seeking access to consumption data both at household and aggregate levels. Accordingly, we anticipate that the breadth of users and applications of aggregated data are likely to be significant. We agree that many uses are yet to be conceived.

We agree that government activity in relation to the development of a Smart Meter Energy Data Repository may provide a longer-term solution that enhances access to smart meter data both at aggregate and household levels. Whether DNO provision of data can be delivered at a 'low marginal cost' in the interim will be subject to the approach taken and the degree to which duplicated efforts can be avoided.

Assessing the proposals from DCC's system perspective we note:

- The potential breadth of new propositions that this data could support may lead to a significant increase in demand from the market (in comparison with use just by DNOs). If this demand were un-constrained, it holds the potential to exceed the volumetrics on which the smart meter network capacity is modelled.
- To ensure we can provide a resilient service, we would welcome discussions around visibility of the projected demand and potential mechanisms through which this demand could be managed – including through the development of repositories.



- The risk for duplicate development of systems is high which may lead to inefficiency and varying degrees of data accuracy and timeliness and potentially increased security risk – we welcome Ofgem’s proposals for a standardised and interoperable approach.

We would also highlight the importance of maintaining transparency for the end consumer. For example, there may be value in exploring the potential to maximise consumer awareness through standardisation of data privacy notices between energy suppliers, DNOs and the DCC. We are continuing to explore opportunities to align and enhance governance around smart metering data through our own data access initiatives.

A forthcoming paper developed by the Energy Systems Catapult in partnership with the DCC will propose establishing an entity to oversee governance, access and utilisation of smart meter data for public good - to overcome the complex interaction and interpretation of smart meter regulations, data legislation obligations.

**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?**

**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?**

In response to questions 11 and 12, we welcome the inclusion of proposals for standardised and interoperable approach to data access. We believe this is of great importance to minimise challenges caused for data users who are looking to deploy solutions across DNO regions, pan GB.

We are broadly supportive of the timescales and are on-hand to help industry in the development of approaches that are technically and financially efficient and robust from a cybersecurity and data privacy perspective.

In context with proposed timescales, we do note the potential passing of the Data Protection and Digital Information Bill which may have implications that require further assessment as DNOs update their Data Privacy Plans.

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

We welcome the ambition to treat flexibility market data as presumed open. The recently published Future of Distributed Flexibility Call for Input discusses the need to increase transparency around flexibility markets, and address the informational asymmetry between flexibility buyers and service providers. Increasing the availability and visibility of existing flexibility market data would be an initial step towards addressing that market failure.



However, we also note that the Future of Distributed Flexibility Call for Input is at a relatively early stage of defining the governance and scope of flexibility data. It may be that these questions need to be addressed further before open data requirements are placed on network companies.

In time, it would be helpful to have a more specific definition of the flexibility services that are in scope, and expectations around what data is likely to be sensitive and what data is expected to be able to be classified as open. This would help to ensure consistency in the data that is available across different licensees.

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

We note that Ofgem is not proposing to set a deadline for making a flexibility data set openly available, unlike the approach taken for smart metering consumption data.

This could present a barrier to implementing this policy change, as without a deadline for compliance or a clear view of what a minimum viable data set is, organisations may not prioritise this activity.