

# Icebreaker One response to Ofgem's consultation on the future of local energy institutions and governance

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This is Icebreaker One's response to Ofgem's consultation on the future of local energy institutions and governance<sup>1</sup>. It can be published openly.

Please note that throughout this consultation, Icebreaker One uses the terms Open, Shared and Closed data as defined [here](#)<sup>2</sup>.

If you have any questions about our submission or require clarifications please do not hesitate to contact us via [openenergy@icebreakerone.org](mailto:openenergy@icebreakerone.org). Thank you for considering our submission.

## **Call for input response:**

### **Q2. What are your views on the detailed design choice considerations described?**

IB1's mission is to make data work harder to deliver net zero. We will only comment the design choices highlighted in paragraph 3.23

*"We expect the foundations of the RSPs to be advanced data processes, including owning data standards, ensuring access permissions and ensuring consistent digitalisation. The responsible entity must have the necessary digital infrastructure and technical competence."*

We support initiatives driven by research, user-needs and which are stakeholder-led. We emphasise the importance of the entity to meaningfully engage with a diverse set of stakeholders.

Whichever body is ultimately chosen, we strongly advise that this body is tasked with developing and governing data standards, access permissions, and digitalisation using an *open standards approach*.

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<sup>1</sup> <https://www.ofgem.gov.uk/publications/consultation-future-local-energy-institutions-and-governance>

<sup>2</sup> <https://icebreakerone.org/open-shared-closed/>

Use of an open standards approach means the governance body must ensure that:

- Participation in standards development and governance is *open to anyone* without undue restriction. For example, participation should *not* be restricted to signatories of a particular code and must include avenues for participation by independent experts.
- Development and governance of data standards is *conducted in the open*. This means that all processes are appropriately documented, published openly, and available for scrutiny.
- Standards created are *accessible to and usable by anyone*. For example, they must not sit behind a paywall or be accessible only for specific groups within the sector.

Overall, we strongly advise the adoption of open standards approaches as a means of governance designed to prevent undue exercise of vested interests, while improving transparency and accountability. This recommendation is applicable to whichever governance body is ultimately assigned responsibility.

From our experience with Open Energy, which was designed to reduce the friction in searching, accessing, and using energy sector data, open engagement with a wide variety of stakeholders allowed for the foundations of a trust framework to address interoperable data sharing.

### **Q3. Do you have views on the appropriate regional boundaries for the RSPs?**

We note that within the UK there are geographical differences and overlaps between various stakeholders within the energy sector - from governments - regional, and local, to DNOs and suppliers. We recommend a Regional System Planner follow an already defined regional jurisdiction rather than creating a new and different region for the RSPs to oversee. This will avoid adding further complexity and confusion in the energy landscape.

### **Q5. Do you agree with our proposal for a single, neutral expert entity to take on a central market facilitation role? If not, why not?**

As mentioned in Question 2, we support the existence and **commitment** to having an independent coordinated body, and again recommend that the entity conduct the delivery and facilitation of their duties in the open.

Icebreaker One's Open Energy programme was developed to reduce friction for data sharing in the energy sector. It provides a proven trust framework to meet energy

sector's varied needs for data classification, access control and licensing, as established through a competitive process with extensive sector input, peer review and scrutiny. The model can further support the implementation of multiple schemes, governed by different bodies (e.g. regulators, code governance bodies or trade bodies) to enable a framework for interoperability across domains.

We believe that to maintain an open market, governance must include public and private sector actors in its design, implementation and enforcement. We recommend having an independent data governance entity. A market-neutral body is a preferred approach to developing and operating market wide solutions.