



Independent Networks  
Association

Jeff Finch  
Ofgem

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

20 September 2024

Dear Jeff

### **Ofgem consultation on the Governance of Data Sharing Infrastructure**

Thank you for the opportunity to respond to this consultation. The Independent Networks Association (INA) represents Independent Distribution Network Operators and Independent Gas Transporters who compete amongst themselves and with others to provide energy networks that serve the domestic, commercial and industrial sectors across Great Britain, as well as wider decarbonisation projects such as generation, storage and transportation and connecting nationally strategic growth projects, such as data centres.

In general, the INA and its members support the proposals in the document. Our main concern of the digitalisation agenda is that changes are not prohibitive for smaller players and new entrants in terms of the costs of investing in multiple bespoke solutions and the administration time overhead that would result. As such, we are broadly supportive of the lighter touch direction of the approach outlined. But do have remaining concerns about cost recovery, the identification of the impact of adopting any data or systems precedents on other parts of the market and the protection of commercially confidential data from competitive areas of the energy markets. These are set out in response to specific, relevant questions below.

#### **Q1. Do you see any potential uses for the DSI within your day-to-day operation in the energy sector?**

We noted that the Arup's Digital Spine Feasibility study saw a Day 1 use case for vulnerable consumer identification. Effective data sharing across utilities could really support the identification of customers and help utilities better plan to support their vulnerable customers. The independent energy and water sectors were disappointed to be excluded from the ability to share data that was afforded the Distribution Network Operators and incumbent water companies. The INA and its members fully supported the Department of Business and Trade Smarter Regulation consultation and subsequent conclusion to move ahead with a 'tell us once' style Priority Services Register (PSR) for vulnerable customers. It is unclear how regulators intend to take this policy forwards but the creation of Data



Independent Networks  
Association

Sharing Infrastructure (DSI) would support this aim and provide an effective means for vulnerable customers, or their advocates, to inform the system once and provide an effective means for this to be shared with the right utilities. It would also be more efficient for the utilities as it would reduce the numbers of times different utilities contact that customer to ascertain if they should be on the PSR.

**Q2. Do you have any comments on the funding mentioned within this section?**

It is very likely that independent networks will largely be providers of data and are not RIIO price controlled. It is therefore right that the costs of providing data and any contribution to the Data Sharing Infrastructure (DSI) costs should be covered by updated charging methodologies to ensure appropriate recovery under the Relative Price Controls for the independent network sector.

**Q4. Do you agree with our short-term governance structure model where the Interim DSI Coordinator is responsible for leading the short-term governance (2024 – 2028) of the DSI?**

We agree with the approach.

**Q6. Are there any additional governance roles that are not covered by the proposed governance model? If so, what are these?**

Whilst the initial step of the project is focussed on outage planning between the NESO and monopoly network providers, there will potentially be precedents around data, processes and systems formats that are created in the initial phase. These may be difficult or unsuitable for smaller network operators to adopt as the use cases develop and successor projects expand. We therefore suggest that within the role of 'significant industry engagement' that impact assessments be established for expected future data providers in advance if the logical next steps of any use case are to widen their data sets over time as may be the case as wider network modelling and/or system planning is required.

**Q7. Do you agree with the responsibilities of the interim DSI Coordinator? Are there any additional responsibilities that it should undertake?**

It is unclear where the responsibility to protect commercially sensitive data falls. This is a particular concern as the independent sector is a competitive model, as are other energy market sectors. It would be useful to clarify that the role is to develop solutions that protect commercially sensitive data, as appropriate.



Independent Networks  
Association

**Q9. Do you agree with us that the System Operator is the best option as the Interim DSI Coordinator? If no, explain your reasons and justify your proposed option.**

Yes, we agree with this proposal. As likely contributors of data over time, the independent network community want to work with and engage with the NESO as it develops its role.

Please let me know if you have any questions on this non-confidential response.

Yours sincerely,

**Nicola Pitts**  
**Executive Director**