

8 August 2025

By email: Digitalisation@ofgem.gov.uk

### **Alt HAN response to Data Best Practice consultation**

We welcome the opportunity to respond to the consultation on the introduction of the Data Best Practice (DBP) obligations to Obligated Parties under industry codes.

Alt HAN Co is cited as being one of the entities which will become an Obligated Party subject to the DBP obligations following amendment to the Smart Meter communication licence and subsequent Modification of the Smart Energy Code (SEC). We have focused our responses only on those questions that are specific to Alt HAN and the SEC changes. We have also included a short explanation about Alt HAN Governance in the appendix which should help frame our responses.

#### **1. Do you agree with our intent to expand DBP Guidance into the codes?**

We would agree that greater standardisation of the development, use and interoperability of industry data and systems should deliver benefits. The introduction of the DBP obligations to codes may assist in achieving this. We would note that this should be achieved at proportionate cost and any Digitalisation Strategy is based on a sensible cost benefit case.

We would note that Alt HAN utilises data from other industry sources. Access to the data comes at a cost to energy suppliers (who fund Alt HAN Co), despite the data coming from other organisations also funded by energy suppliers and other industry participants. If this initiative leads to greater access to open data through improved interoperability this should drive down overall industry costs and those savings in turn should reduce the pass through costs of central services to consumers.

#### **2. Do you agree with the proposed deadline six months after the licence condition is applied for consequential code modifications? If not, please state your reasons specific to the relevant code and modification process.**

We would agree that six months is a reasonable time to implement code modifications following a licence change. This is on the basis that:

- i) the modification does not place any obligation more onerous than that intended by the licence change on Obligated Parties;

- ii) Obligated Parties have a say in the Modification drafting and progression;
- iii) Obligated Parties have a suitable period of time following the modification to produce the first DSAPs.

**3. Do you agree with the minded-to position that an obligation to produce DSAPs is suitable and proportionate for code bodies? If not, what alternative would you propose to achieve the same or greater benefits?**

We would note that Alt HAN Co would meet any new obligation placed upon it if stakeholders and Ofgem determined this to be the most suitable mechanism. We would expect Obligated Parties to be given sufficient time to develop any DSAPs following the completion of any licence and code changes that confirm the final set of obligations on those Parties.

It is difficult to determine if this or alternative approaches achieve the same or greater benefits as the new obligations have not been costed or subject to a Cost Benefit Analysis. Stakeholders therefore must take it on faith that this is a good thing and will achieve the anticipated goals. It is unclear the level to which code bodies would need to adapt and develop existing systems to meet any accepted standards and at what cost. In addition, different code bodies may still continue with or develop preferred technology stacks which may or may not align easily with wider industry standards/approaches given the fragmentation of industry data and systems. There may be benefit in a cross industry system design authority? Nor is it clear how Ofgem might determine compliance with the licence conditions, there is a framework in place, but that framework is open to interpretation by Ofgem as to how it is applied. There are a number of initiatives related to data in the energy industry, it would be good to understand how these all align into a coherent packages of changes (e.g. Smart Meter Energy Data Repository, consumer access, etc).

**9. Do you have any concerns, or can you see any risks or issues, with the proposed change to the Smart Meter Communication Licence amending the SEC?**

Alt HAN Co would like to clarify how the obligation would work in practice. As drafted the obligation applies to SECCo, SEC Panel and Alt HAN Co and refers to deliverables in the singular form (e.g. must submit a 'Plan'). Is it the intent that the three functions would submit a singular plan and effectively place shared reliance on them all to ensure this is completed and delivered in a consolidated form? We believe the appropriate interpretation is that the obligations resides with each individual entity and therefore each would deliver (or determine how best to deliver) the obligations through their DSAPs. Compliance assessment and discussions would then be held with the relevant entities.

The primary decision making body under the Alt HAN arrangements is the Alt HAN Forum. This decision making body is comprised of Relevant Suppliers. Decisions of the Forum are only appealable to Ofgem and are distinct and separate from SECCo and SEC Panel activities. Other

obligations in Section Z of the SEC cascade via the Forum and are delivered by Alt HAN Co (the Board and company) on the instruction of the Forum.

The consultation indicates that eventually the obligation will apply within the Code Manager licence. In the case of the SEC it remains unclear what Code licensing would mean for the current way that governance of the SEC with regards to how this would impact the Alt HAN arrangements.

**11. Do you think this proposed principle merits discussion at the CACoP forum for inclusion in CACoP v7.0?**

We understand that Ofgem is proposing that the CACoP will eventually be discontinued with the introduction of the Code manager licensing regime (see Ofgem's Second consultation on the implementation of the energy code reform). The first licence awards are already underway and the subsequent licences will begin to be introduced in parallel with the implementation and execution of these proposed changes. As the obligations will clearly be set out in the licence and code changes proposed in this consultation it does not seem necessary to further include the DBP principles into a document that will become redundant thereafter. Even if the CACoP were to continue, the inclusion of DBP obligations seems unnecessary due to the fact that the obligations are in the licence and code which take precedence over CACoP so adding them into CACoP has a nugatory effect.

We would be happy to discuss our response further. Please contact my colleague [David.jones@althanco.com](mailto:David.jones@althanco.com) in the first instance.

Yours sincerely



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