

Sent by email to:
digitalisation@ofgem.gov.uk

Charles Clarke
Energy Sector Digitalisation
Ofgem

11 August 2025

Dear Charles,

Data Best Practice as a Code Obligation

We welcome this opportunity to respond to Ofgem's Consultation on Data Best Practice as a Code Obligation.

Energy Networks Association (ENA) represents the companies which operate the electricity wires in the UK and Ireland. This response is written on behalf of the Distribution Network Operators ("DNOs") and Transmission Owners ("TOs") listed below. This response sets out the collective views of our members, each of whom may be providing their own company specific responses to the questions contained in the Consultation.

If you would like to discuss any of the points raised in this submission, please contact
abbas.mahmood@energynetworks.org.

Yours sincerely,

Energy Networks Association

On behalf of:

1. Electricity North West Limited
2. Northern Powergrid (Northeast) plc
3. Northern Powergrid (Yorkshire) plc
4. SP Distribution plc
5. SP Manweb plc
6. Scottish Hydro Electric Power Distribution plc
7. Southern Electric Power Distribution plc
8. Eastern Power Networks plc
9. London Power Networks plc

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10. South Eastern Power Networks plc
11. National Grid Electricity Distribution (East Midlands) plc
12. National Grid Electricity Distribution (West Midlands) plc
13. National Grid Electricity Distribution (South West) plc
14. National Grid Electricity Distribution (South Wales) plc
15. National Grid Electricity Transmission plc
16. Scottish Hydro Electric Transmission plc
17. SP Transmission plc

Section 2 Questions – Intent behind the Proposed Changes

Q1. Do you agree with our intent to expand DBP Guidance into the codes?

Electricity networks agree. Extending DBP into the industry codes will embed consistent, outcomes-based data practice within code governance and improve discoverability, interoperability and openness of code-related information.

Implementation should remain proportionate and risk-based, reuse established sector artefacts (e.g. triage methods, standard licences, and public catalogues), and set out a clear evidence model so compliance is auditable without excessive burden.

Q2. 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.

Electricity networks broadly agree, subject to pragmatic flexibility. Six months is a reasonable target across most codes, but governance cycles and resourcing vary between code bodies.

Where a panel can evidence capacity constraints or a clustered change programme, short, justified extensions should be permitted. Common drafting patterns and an indicative timetable by code would reduce duplication and help keep changes on track.

Q3. 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?

Electricity networks agree in principle. DSAPs are a proportionate way to increase transparency, align digital initiatives (catalogues, APIs, metadata) and give users a clear improvement roadmap.

Initial cycles should be light-touch, focus on a small set of measurable actions (e.g. catalogue coverage, time-to-publish, API pilots) and align explicitly with DBP processes to avoid parallel paperwork.

Section 3 Questions – Our vision for governance of the DSI

Q4. Do you have any concerns, or can you see any risks or issues, with the proposed change to the Electricity System Operator Licence amending the BSC?

Electricity networks broadly support the change and have no fundamental concerns. Success depends on alignment with NESO's wider digital and operational responsibilities so triage, catalogue ownership and performance reporting are clear and not duplicated between Elexon/BSCCo and NESO.

Security-sensitive material should follow proportionate restricted/registered access routes with auditable decision records.

Q5. Do you have any concerns, or can you see any risks or issues, with the proposed change to the Electricity System Operator Licence amending the CUSC, STC, and Grid Code?

Electricity networks are supportive, provided NESO and relevant administrators are sufficiently resourced and delivery is coordinated across these codes. Many datasets and change issues span the trio; inconsistent approaches would raise costs and confuse users.

A shared approach to minimum metadata, DBP triage, DSAP metrics and a "single front door" for user feedback will minimise duplication and manage cross-code dependencies.

Q6. Do you have any concerns, or can you see any risks or issues, with the proposed change to the Electricity Distribution Licence amending the Distribution Code?

Electricity networks are supportive. This is an evolutionary step that can leverage existing DBP practice across DNOs and the Distribution Code administrator to deliver proportionate catalogues, clear licensing and auditable triage while protecting security-sensitive information.

Proportionate assurance, annual self-attestation with occasional sample audit, overseen by the Distribution Code governance would be appropriate.

Q7. Do you have any concerns, or can you see any risks or issues, with the proposed change to the Electricity Distribution Licence amending the DCUSA?

Electricity networks are supportive, with a need for implementation clarity. ElectraLink/DCUSA Ltd should set out how DBP triage will apply to DCUSA artefacts, what will be published and where, publication cadence/metrics for DSAP delivery, and proportionality for parties of different sizes.

A short, time-bound appeals route for rejected requests, with security/privacy guardrails, would increase trust and predictability.

Q8. Do you have any concerns, or can you see any risks or issues, with the proposed change to the Electricity and Gas Supply Licences amending the REC?

Electricity networks are supportive, on a proportionate and phased basis. Given REC's sector-wide role, DBP/DSAP delivery should prioritise reusing existing capabilities, avoid duplication with parallel reforms, and focus on visible user benefits.

Clear success metrics, such as catalogue coverage and time-to-decision on data requests, will support accountability and user confidence.

Q9. 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?

Electricity networks support alignment, recognising the SEC's security and privacy obligations. Early engagement with SECAS/SECCo is important to set realistic DSAP scope, align triage and catalogue practices with SEC governance, and sequence milestones alongside the DCC review to avoid conflicting requirements.

A proportionate "restricted/registered access" model for sensitive datasets should be defined with clear accountabilities for catalogue and evidence management.

Q10. Do you have any concerns, or can you see any risks or issues, with the proposed change to the Gas Transporter Licence amending the UNC and IGTUNC?

From the perspective of electricity networks, these proposals are broadly supported. Consistency across energy markets benefits data users, but implementation should account for differing capabilities and maturity across transporters and IGTs.

Staged adoption where necessary, outcomes-based obligations, and alignment of user experience (triage, catalogue, licensing) with electricity where sensible will help cross-market users.

Q11. Do you think this proposed principle merits discussion at the CACoP forum for inclusion in CACoP v7.0?

Electricity networks agree. Including a CACoP principle that code administrators follow DBP and publish DSAPs would embed cross-code consistency and transparency, complementing licence changes and giving users a common baseline of expectations and reporting.

The principle should reflect proportionate, risk-based application, include a short list of shared metrics, and encourage common templates to keep costs down.

Q12. Do you have any concerns, or can you see any risks or issues, with the proposed change to the Smart Meter Communication Licence?

Electricity networks support the proposal in principle. Treating DBP as a referenced/core document and placing DBP/DSAP obligations directly in the SMCL will clarify responsibilities and improve accountability.

Overlaps with other smart-meter governance changes should be mapped and sequenced to avoid conflicting requirements, and a clear evidence model should be confirmed to prevent duplicate processes.