

# ELEXON

**11 August 2025**

By e-mail to: [digitalisation@ofgem.gov.uk](mailto:digitalisation@ofgem.gov.uk)

**Dear Charles Clark**

**Re: Consultation on Data Best Practice as a Code Obligation**

Thank you for the opportunity to respond to your consultation on expanding the obligation to follow Data Best Practice to code bodies.

Elexon is an independent, not-for-profit delivery body that has operated for 25 years, playing a critical role in opening markets and supporting the transition to a net zero energy system. We provide governance, settlement and data platforms (Elexon Kinnect), and manage the Balancing and Settlement Code (BSC), enabling the smooth and efficient operation of the electricity market across Great Britain. Over the past year, we have supported around 50 new market entrants, fostering a more flexible and innovative energy system.

Our end-to-end expertise in governance, assurance, technology platform development and electricity market data supports the industry, Government and Ofgem. In line with our purpose of serving the industry, the electricity market data we hold is open and accessible for analysis and distribution. As a trusted, independent market expert, we continuously evolve and innovate for the benefit of our customers and consumers.

Ofgem has appointed us as the market facilitator for flexibility markets, both local and national. Our role focuses on reducing friction, aligning transmission and distribution arrangements, and ensuring better coordination. The market facilitator is expected to be operational by the end of 2025, with transitional arrangements underway. Ongoing engagement with all the network operators is critical to ensure coordinated flexibility markets that supports low carbon technologies and distributed energy resources.

We are also the Implementation Manager for the Market-wide Half Hourly Settlement (MHHS) Programme, a key enabler of the flexibility required for the transition to net zero. Once live, Elexon will manage up to 38million energy readings daily. Half-hourly data is an important enabler for demand side response and can encourage more flexible use of energy – reducing household bills and rewarding customers.

We have limited our response to areas where we can add value. For further discussion, please contact Hussein Osman, Market Advisor ([Hussein.osman@elexon.co.uk](mailto:Hussein.osman@elexon.co.uk)).

Yours sincerely,

Francis Dike  
Head of Market Intelligence and Advisory

## Summary

**We fully support Ofgem's proposals to extend Data Best Practice (DBP) to code bodies via licence obligations and welcome the intention to broaden its scope wider.** We have advocated for this extension since our response to the DBP consultation for network operators in April 2023, and we also supported Ofgem's Open Letter on DBP and its future role in industry codes last year. We particularly value the framework's non-prescriptive approach, which we believe is appropriate given the nature of data and the varying levels of digital maturity across code bodies.

**Data plays a crucial role in enabling the transition to a smarter, decarbonised, and decentralised energy system.** As the system becomes more decentralised, with millions of distributed assets, effective use of data will improve efficiencies, enable large-scale system connections, and deliver both direct and indirect benefits to consumers. Data is also a key enabler for achieving Clean Power 2030. Realising the value of data and ensuring it is open, accessible, discoverable, and usable has been a major challenge for the sector. This has been highlighted as a barrier in reports such as the Energy Systems Catapult's Energy Data Taskforce report in 2019<sup>1</sup>. We see Ofgem's DBP Guidance and framework as one of the solutions to bridge this gap.

**Elexon has a strong track record of voluntarily aligning with DBP principles to benefit the market by making data as open and accessible as possible.** We have made all BSC data 'open' where possible, supported API documentation through the Insights Solution to simplify data access, adopted Dublin Core metadata standards for cataloguing data flows, collaborated with stakeholders to provide data access, and hosted industry roundtables to identify gaps and opportunities for improvement. Additionally, we published our first Digitalisation Strategy and Action Plan, outlining Elexon's digital vision and the steps to achieve it, and launched a Digital Code to transition BSC documents from PDFs to digital formats.

**While we have voluntarily complied with DBP principles, we acknowledge there is more to do.** We have established internal working groups to assess current status and map out steps to ensure full compliance across Elexon's systems. We will continue engaging through the Cross Code Digitalisation Steering Group and maintain bilateral discussions with Ofgem to stay on track with DBP implementation.

**We recommend that this workstream remains aligned with the Code Reform workstream.** Where possible, particularly for Elexon, aligning DBP implementation with Code Reform may be simpler and more effective than the route proposed in the consultation. Nonetheless, Elexon is ready to support the implementation of DBP within codes and is committed to realising the benefits quickly given the urgency of the 2030 target.

**We remain fully committed to playing a leading role in improving data accessibility, discoverability, and interoperability across the energy sector.** We will continue collaborating with Ofgem and industry through the Cross Code Digitalisation Steering Group and bilaterally where needed to ensure Elexon's full compliance with DBP principles and to keep the framework relevant and fit for purpose moving forward.

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<sup>1</sup> Energy Systems Catapult (2019) Energy Data Taskforce: A Strategy for a Modern Digitalised Energy System. Available at: [Energy Data Taskforce | A Modern Digitalised Energy System](#)

## Elaxon's consultation response

We have limited our responses to the questions relevant to Elaxon and where we can add value.

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

Yes, as highlighted above, we are fully supportive of expanding the DBP Guidance into the industry codes, which is something we have previously called for. We also support Ofgem's intention to extend DBP requirements to a wider range of market participants, as this will help support Ofgem's goal of improving data interoperability and making data more accessible, discoverable and usable.

This transition should be manageable given some code bodies have already been voluntarily following DBP principles. While it will not be entirely new, there will need to be a step change to reflect the move from voluntary adoption to mandatory compliance.

### **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.**

Yes, we think this is reasonable, demonstrates urgency, and is something we will support and deliver in line with Ofgem's expectations. While code reform will take effect at different times for other code bodies, there is value in considering a different approach for Elaxon, particularly as we are one of the first to transition to the role of Code Manager.

Given the parallel development of Code Reform, it may be worth assessing whether the outlined process is necessary for Elaxon. It could be simpler and more efficient to apply the licence condition directly in Elaxon's Code Manager licence, especially as our licence goes live next year and the timing appears to align with the implementation of the relevant licence conditions and modifications.

This may be better approached on a case-by-case basis rather than applying the same process to all code bodies.

### **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?**

Yes, we agree that it is suitable and proportionate for code bodies to produce a DSAP. As mentioned above, Elaxon published its first DSAP last year and will be issuing an updated version shortly. We have received positive feedback from the sector on the clarity of our digitalisation vision and the transparency of our approach to delivering it. While it may be the first time many code bodies are developing a DSAP next year, there is helpful guidance available, particularly the DSAP principles, which provide useful support in shaping the plans and serve as a reference point.

However, we recommend reviewing the proposed frequency for updating the action plan. Given the smaller size of code bodies compared to network operators, and the nature of deliverables, it may be more proportionate to require updates annually rather than every six months. We are comfortable with the current expectation of publishing a full DSAP every two years, but we question whether a six-monthly update would offer significantly more value than an annual one.

We would also recommend aligning DSAP publication timelines with other key

documents to avoid overlap and reduce duplication, especially given the increasing number of publication requirements. For example, Elexon will be required to publish a Business Plan, Annual Report, Delivery Plan as part of its Code Manager role, a Delivery Plan and Schedule for its Market Facilitator role, as well as the DSAP.

Aligning these publications, both internally and with wider industry timelines, would help maximise the value of the DSAP and ensure it is not lost among a range of other publications.

**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?**

No.