

Registered Office:
Newington House
237 Southwark Bridge Road
London SE1 6NP

Company:
UK Power Networks
(Operations) Limited



Registered in England and Wales No: 3870728

Charley Clark
Energy System Digitalisation Team
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

By email only to: Digitalisation@ofgem.gov.uk

08 August 2025

Dear Charley

Data Best Practice as a Code Obligation

Thank you for the opportunity to respond to the above consultation dated 30 June 2025. This response is on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. We are Great Britain's largest electricity Distribution Network Operator (DNO), dedicated to delivering a safe, secure and sustainable electricity supply to 8.5 million homes and businesses.

The Data Best Practice Principles are fully embedded into UK Power Networks' data management framework and used to regularly assess our maturity level. The principles are also used to look at opportunities for continuous development such as greater data accessibility features and the adoption of emerging changes to common data formats.

We are in favour of broader adoption of the principles across the energy sector, with us already using the framework in our work with existing partners. We have worked with stakeholders at Ofgem to devise the Data Best Practice maturity model, which we have shared openly on our open data portal ([Our Maturity Framework for Ofgem's Data Best Practice Principles – UK Power Networks](#)). This shows how we measure our maturity against each principle and the artefacts we consider necessary at different levels of optimisation. Greater consistency across the energy sector can only lead to better outcomes for consumers, and operating from the same core data principles will support this. We are therefore in favour of these changes, including the minor amendments to our existing requirements to facilitate greater clarity.

We have noted that in paragraph 2.20 this consultation is referred to as a 'statutory' consultation, elsewhere it is a normal 'policy' consultation. It is with this in mind that we look forward to engagement via the Licence Drafting Working Group (LDWG) in due course to finalise the precise wording of the licence obligation prior to the wording being issued as statutory consultation with the formal notice required under section 11 of the Act. Based on this, the process set out in paragraph 4.6 would need amending as Ofgem have so far only issued a policy consultation i.e. this consultation, and is yet to issue a statutory consultation and formal notice. If Ofgem decides to move forward with these licence amendments after this policy consultation, a formal notice and a statutory consultation will be necessary after engagement with the LDWG.

Please see our answers to the relevant questions in the appendix below. If you have any questions, please do not hesitate to contact me in the first instance.

Yours sincerely,



James Hope

Head of Regulation & Regulatory Finance
UK Power Networks



Appendix

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

Yes, we agree with this expansion.

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?

As stated in our covering letter, this is not a statutory consultation, so there are further steps that are necessary before changes to the Electricity Distribution Licence can be made. There should be engagement with the LDWG on the proposed amendments to the licence wording before proceeding being to a formal statutory consultation with the associated formal notice required under section 11 of the Act.

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?

Please see our answer to Q6.

