Consultation

Securing Open Data in Energy

Publication date:	29 May 2026
Response deadline:	14 July 2026
Contact:	Charley Clark
Team:	Energy System Digitalisation
Email:	digitalisation@ofgem.gov.uk

We[1] are consulting on changing the triage approach to Data Best Practice Guidance ("DBP Guidance") for all parties currently obligated to follow DBP Guidance by Licence Condition. This is a policy consultation and will be followed by a statutory consultation. We seek views from organisations and people with an interest in digitalisation of the energy system, network licensees. We particularly welcome responses from third parties who utilise Open Data[2]. We would also welcome responses from other stakeholders and the public.

[1] References to the "Authority", "Ofgem", "we" and "our" are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day-to-day work.
[2] Capitalised terms are taken from the current DBP Guidance and Supporting Information.

Contents

Executive summary

The GB energy system is in a time of generational change, and digitalisation is at the heart of making that change as effective and affordable as we can. Data needs to flow effectively through the energy system to inform decisions, increase visibility, and help reduce cost of the transition to net zero.

Data is commonly considered to be a spectrum, as described by the Open Data Institute's Data Spectrum.[3] At one end is Closed Data, such as the exact, real-time working of Critical National Infrastructure or the consumption patterns coming from an individual's home, which should not be disclosed beyond the organisation / individual other than in the context of specific services supplied to that organisation / individual. In the middle is a wide range of Shared Data, which is still confidential or too sensitive for whatever reason to be openly published, but has significant utility for the system and therefore needs to be shared with known partners through a trusted framework – like the Data Sharing Infrastructure. At the other end is Open Data, data which can be safely published without restrictions for innovators, developers and others to use to build tools and new products.

This consultation relates to the triage and classification of Open Data only. Open data represents the smallest proportion of these three buckets, and we expect that the result of the changes proposed in this consultation is likely to increase the proportion of data being triaged as 'shared' rather than 'open'.

Ofgem made compliance with Data Best Practice Guidance, which considered Energy System Data (ESD) to be 'presumed open', a requirement for electricity transmission, gas transmission and gas distribution licensees in 2021 and for electricity distribution network operators (DNOs) in 2023.[4]

This licence condition aims to increasing the interoperability, standardisation, discoverability and openness of data in the energy system. DBP is designed to increase innovation by improving and increasing access to data for those outside the networks, in order to create new solutions.

Since then, the global security landscape has changed. Hostile state actors and terrorists have targeted energy infrastructure, for example in Berlin in January 2026[5] and the ongoing wars in Europe and the Middle East. The increased use of AI has also changed how Open Data might be used and necessitated that we give further careful and prudent consideration as to when network companies should publish data openly.

[3] The Data Spectrum | The ODI

[4] References to 'licensees' in this consultation are to these licensees, i.e. those that are required to comply with the Data Best Practice Guidance via their licence conditions.

[5] Berlin outage highlights German vulnerability to sabotage - BBC News

Given the changed security landscape and the increased risk that could result from open data publications, we believe it prudent to re-examine the triage process which underpins the principle of 'presumed open' data and allows for safe and secure publication of ESD.

With that in mind, we are proposing to change the model for how ESD is triaged. In this consultation, we present three possible models for data triage;

- **The Centralised Model** – This approach has licensees sending all ESD to a central triage function, held by the Digitalisation Coordination Function [6], which triages whether or not the data is suitable for open publication and holds data categorised as open on a central open data platform. This provides a 'one-stop shop' for standardised and interoperable data. In this, the primary responsibility for data triage is held by the Digitalisation Coordination Function.
- **The Hybrid Model** – This approach has the licensees continuing to triage data as currently using updated triage guidance, then sending the data to the Digitalisation Coordination Function for a triage validation. Following this the data would be published centrally or rejected if validation failed. In this, the primary responsibility for triage remains with the licensee.
- **The Educational Model –** This approach is closest to current practices, with licensees triaging and publishing open data themselves. This will be supported with updated and more detailed triage guidance and series of workshops and courses to improve and standardise triage processes, in order to make it more consistent. In this, the responsibility for triage remains with the licensee.

This does not represent any retreat from Open Data, or the principle of 'presumed open.' We are mindful of the considerable benefits access to data has brought the energy system and seek to maximise the growth benefits from keeping data open, while seeking to increase the security of the energy system to reflect the new reality.

In addition to our proposed changes, we are taking action to engage bilaterally with licensees and industry fora to make triage more uniform in practice and reduce the risk profile. With this consultation, we are seeking industry views on how to amend the Open Data Triage process to better reflect the changed security landscape while retaining the utility and access to data that DBP Guidance was designed to achieve.

[6] Energy digitalisation framework: a vision for a coordinated and connected energy system - GOV.UK

1. Introduction

This section details the purpose and overview of this document, sets out the contents of each section and details the related publications, timelines, and how parties can respond.

Purpose of this consultation

This is a policy consultation and will be followed by a statutory consultation. We seek views from organisations and people with an interest in digitalisation of the energy system and those currently obligated to follow DBP Guidance by licence. The purpose of this consultation is to seek industry views on which approach to take when seeking to reinforce and strengthen the triage process to better suit the changed threat environment. This ties into p29 and 30 of Ofgem's Forward Work Plan.[7]

Data is commonly understood to exist on a spectrum, and Ofgem utilises the ODI Data Spectrum when describing our open data policy.[8]

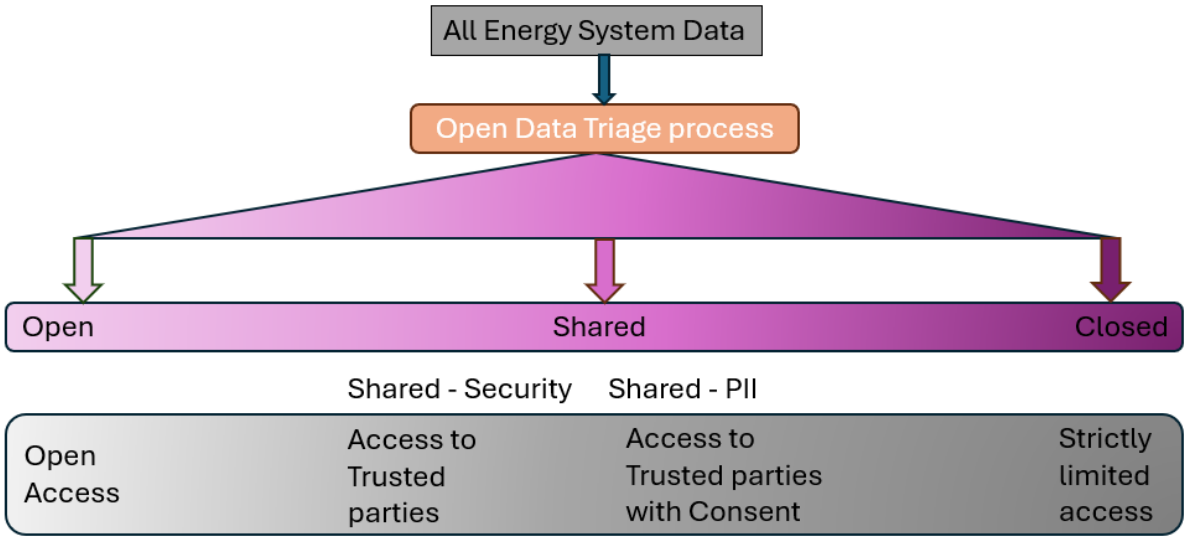


Figure 1: A diagram showing the data spectrum from Open to Closed

While all licensees that follow DBP Guidance are required to triage Energy System Data (ESD) for suitability for publication on a 'presumed open' basis, some data will only be suitable for sharing on a trusted or secure basis. This consultation addresses openly published data only and does not apply to Shared or Closed data which would not be published openly, and would only be accessible through secure means, such as the DSI, to trusted participants.

[7] Forward-Work-Programme-2026-to-2027.pdf
[8] The Data Spectrum | The ODI

The changed and evolving threat landscape described in section 2 and the three potential triage models described in section 3 relate only to the triage process, and to data which has been triaged as open and suitable to publish.

DESNZ will consult on options and responsibilities for a digitalisation coordination function by the end of 2026, including whether it should be delivered by an existing organisation or a new independent body. It will also set out the detailed roles, responsibilities and governance processes for the coordination function, for stakeholder feedback.

Context and related publications

These proposed changes are aligned with the proposed Digitalisation Coordination Function as described in the Energy Digitalisation Framework Energy digitalisation framework: a vision for a coordinated and connected energy system (accessible webpage) - GOV.UK and the Interim Data Sharing Infrastructure (DSI) Co-ordinator role as described in the Governance of the Data Sharing Infrastructure Governance of the Data Sharing Infrastructure | Ofgem.

Data Best Practice Guidance can be found here Data Best Practice guidance | Ofgem, and the most recent decision to expand DBP Guidance to the Smart Meter Communication Licence can be found here Data Best Practice as a Code Obligation | Ofgem.

Overview

This consultation considers the options for changing triage in the face of a changed threat environment and the reasons to retain the principle of 'presumed open' in the face of the increased risk outlined in Section 2. It then sets out three possible approaches to strengthening and securing the Open Data Triage process while retaining the value garnered from Open Data. These are referred to throughout as;

- The Centralised Model
- The Hybrid Model
- The Educational Model

Full detail and initial costings for these three approaches can be found in Section 3, with our initial minded-to position, conclusion and next steps in Section 4.

Consultation stages

Stage 1 Consultation open: 31 May 2026

Stage 2 Consultation closes (awaiting decision). Deadline for responses: 14 July 2026

Stage 3 Responses reviewed and published: 20 July 2026

Consultation Securing Open Data in Energy

Stage 4 Consultation outcome – Statutory Consultation

How to respond

We want to hear from anyone interested in this consultation. Please send your response to the person or team named on the front page of this document.

We have asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.

We will publish non-confidential responses on our website.

Your response, data, and confidentiality

You can ask us to keep your response, or parts of your response, confidential. We will respect this, subject to obligations to disclose information. For example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations, or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you do wish to be kept confidential and those that you do not wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we will contact you to discuss which parts of the information in your response should be kept confidential and which can be published. We might ask for reasons why.

If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the United Kingdom's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.

If you wish to respond confidentially, we will keep your response confidential, but we will publish the number, but not the names, of confidential responses we receive. We will not link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

How to track the progress of a consultation

1. Find the web page for the call for input you would like to receive updates on.

2. Click ‘Get emails about this page’, enter your email address and click ‘Submit’.
3. You will receive an email to notify you when it has changed status.

A consultation has three stages: ‘Open’, ‘Closed (awaiting decision)’, and ‘Closed (with decision)’.

2. Risk Versus Growth

This section covers the evolving threat landscape to GB infrastructure, and how open data presents potential risk to the GB energy system. This risk is considered alongside the need for economic growth and decarbonisation and how open data enables both of these. As the risk is presently understood to be greatest for data relating the Critical National Infrastructure (CNI), the main focus is on data published by network licensees.

The need for balance

2.1 This section addresses the inherent tension between the risk to energy security and the need for growth and decarbonisation. Much of the utility taken from the development of data is through aggregation of multiple datasets, enabled by machine learning and the reduced cost of compute time. This more insightful, granular and useful aggregated data is of significant utility to the energy system but could also pose increased risk through the visibility of energy infrastructure it presents to hostile actors.

2.2 Simply withdrawing the data from public view or reversing the principle of ‘presumed open’ could cause substantial harm to multiple ongoing initiatives, including flexibility services and other growth-focused programmes which seek to reduce consumer bills, and minimise the cost of the transition to low carbon technologies and network build. We consider the potential harm of this outweighs the possible risk, and that mitigations are available to bring the risk to an acceptable level. More detail around this can be found in Wider Mitigations at the end of this section.

Benefits of Open Data to date

2.3 The publication of energy system data predates DBP Guidance. For example, open Balancing Services data forms a critical component of the Balancing and Settlement Code (BSC) and the Balancing Services Use of System (BSUoS) charges that are levelled on market participants to support symmetrical information and competitive markets. Sensitivity factor matrices are published to allow connection applicants to understand the potential network impact, and fault level data is published to support safe design of electrical installations. We do not propose to change long established use cases such as those identified above.

2.4 In 2023 it was decided that aggregated smart meter data[9] was to be triaged by DNOs and treated as presumed open. Following publication of this data, it has been used in local energy planning and network investment planning.[10], [11] Data published since DBP Guidance was issued has also been used for a number of innovative projects[12] such as real time power cut alerts for EV drivers or national power outages maps, as well as supporting local authorities in Local Area Energy Planning (LAEP)[13]. The data has also created multiple opportunities for academic research, "Living Labs", and innovation projects which will help accelerate the transition of the energy sector.

2.5 Since 2019, when DBP Guidance was first proposed, drivers of change in the energy sector have come to rely on the data made available through DBP Guidance, and the market functions of the GB energy system rely on published data which helps level the playing field between market participants and allows nascent markets such as Flexibility Service Providers to compete fairly.

2.6 Withdrawal of the level of data access currently within the GB energy sector could have the following consequences;

- Reduction in market transparency, creating information asymmetry, reducing competition, and potentially hampering nascent markets / reducing market entrants.
- Increased cost of network build and transition to a net zero energy system, due to lack of system visibility, resulting in unnecessary or improperly targeted infrastructure build.

2.7 International disadvantage to GB through lack of market information relating to interconnectors giving rise to asymmetrical information for interconnector pricing and possibly reduced market access.

- Impediment to connection reform, connection planning, and local energy planning because access to geospatial and capacity data will be more complex.
- Reduced effectiveness of research and innovation.

2.8 Since DBP Guidance has been instigated, we have been gathering evidence of efficacy and testing the policy for effectiveness. To further develop the evidence

[9] Decision on updates to Data Best Practice Guidance and Digitalisation Strategy and Action Plan Guidance | Ofgem
[10] POST-PN-0703.pdf
[11] Home - Your Local Net Zero Hub
[12] Open Data Portal Reuses — UK Power Networks
[13] POST-PN-0703.pdf

base, we would invite contributions from users of data made available under the DBP Guidance, and would welcome examples of innovative products or services, or benefits accrued from greater availability of data. We would welcome examples of concrete use cases where data published under DBP has been instrumental, ideally with quantified impacts. In addition, any examples where risk has been mitigated in the use of open data, whether to business practices or more widely would be welcomed. As with all consultation responses, we will not publish anything marked as confidential.

Question 1: Please provide examples of where data made available under DBP Guidance has allowed your business model to develop either new products and services, or make efficiency savings?

Changing risk environment

2.9 While the benefits of open data are significant, we must, as a prudent regulator, be mindful of the changed international environment brought on by geopolitical instability, machine learning and AI enabled attacks, increasing sophistication of targeting, and the increased targeting of energy infrastructure both inside and outside of armed conflicts. Risks of electricity transmission failure, or more localised system failure in the UK Energy sector – while reviewed as 'cause-agnostic' rather than specifically referring to hostile action – is logged on the UK National Risk Register 2025.[14] Several reports, including the International Energy Agency[15] have detailed Russian targeting of Ukrainian energy systems during the four-year conflict.

2.10 In response to the Berlin terror attack in January 2026 which left 40,000 households without power for more than 4 days, the German chancellor, Freidrich Merz[16], has stated that authorities should review how much information they disclose in future about key infrastructure facilities.

2.11 While GB has been a leader in the publishing of Open Data for energy systems, there are several EU nations who publish similar levels of open data[17] and are in the process of reconsidering either the level, detail, or granularity of published data; or are in the process of putting in mitigations to better reflect the evolving threat landscape.

[14] National_Risk_Register_2025.pdf – p90-95
[15] Ukraine's energy system under attack – Ukraine's Energy Security and the Coming Winter – Analysis - IEA
[16] Koalition will kritische Infrastruktur besser schützen | tagesschau.de
[17] Open energy data on the European Data Portal | data.europa.eu

2.12 The development of aggregated data has become more sophisticated since the DBP Guidance was issued. Whilst our expectation is that the data published has provided an accelerant to growth in the GB energy network, there is also the potential for an increased threat surface area, both in terms of reconnaissance for a physical attack, and potential ingress for cyber vectors.

2.13 In addition, there has been broader long-term trend of increasing attacker sophistication and capability which is – in part – enabled by the uptake and use of AI and machine-learning enabled attacks, both in cyber and reconnaissance. Ofgem has been working with a number of partner agencies to increase security however this iterative approach may not always keep pace with the evolving threat landscape.

2.14 Furthermore, there exists aggregation risk, which is the concept that individual datasets may be suitable for publication in isolation but expose greater visibility than expected when combined with other open datasets, whether published under DBP Guidance, or from other sources. This aggregation of data, while a useful feature of interoperability and an intended outcome of open data, has presented complications from a triage viewpoint, as the sensitivities of individual datasets are more challenging to predict with the increased availability of data. This aggregation risk has been covered in triage guidance, both DBP Supporting Information and the ENA Data Triage playbook but still presents complexities in the triage process without easy solutions.

2.15 The need for a balanced response is increasingly apparent. While DBP Guidance is one facet of the Open Data Landscape, we are proposing a considerable overhaul of the triage process – detailed in section 3 – as well as mitigations for other publishers of open data under different regulatory frameworks.

2.16 Open Data Triage, as detailed in pages 53 to 79 of the DBP Supporting Information[18], describes how licensees are required to review all ESD – Data Assets, their associated Metadata and Software Scripts used to process Data Assets – for potential sensitivities which could pose a risk, either alone, or aggregated with other data sources. The triage process is required to record the following;

- What has been triaged
- When the process took place
- a description of the sensitivities and risks, if any, that have been identified, including the type of sensitivity as defined in DBP Supporting Information

[18] Data_Best_Practice_Supporting_Information_CLEAN&ACC.pdf

- The options considered for how to mitigate sensitivities or risks identified and the impact this would have on utility of the data assets, and
- Any decisions made.

2.17 In the event that no sensitivities are found, DBP Guidance requires the licensee to treat this data as Open Data and publish it within a Data Catalogue. Publication may be on an Open Data Portal. In the event sensitivities or risks are identified as part of the triage process, licensees are required to consider what the minimum level of mitigation technique is required to remove or reduce the risk so as to allow the data to be safely published. In the event no mitigation would be sufficient to mitigate the risk or sensitivity, the data will not be published.

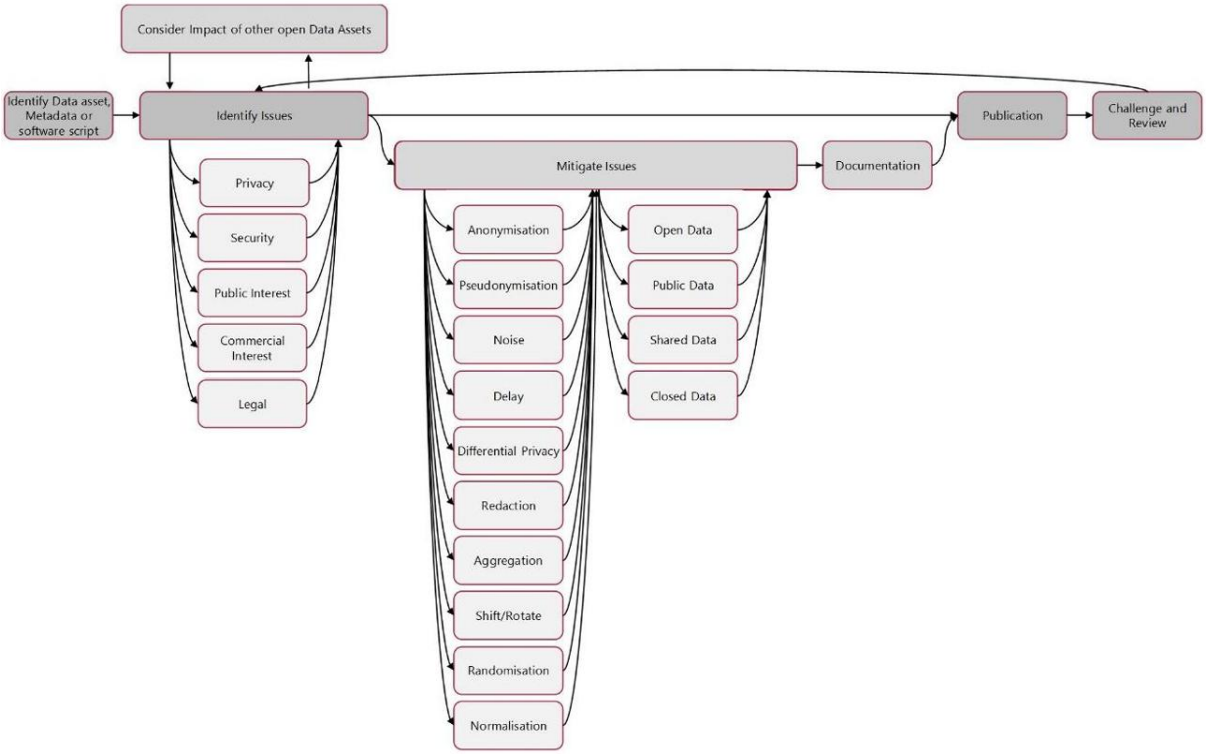


Figure 2: A process flow chart explaining high-level triage.

2.18 This process is explained in more detail in DBP Supporting Information and supported by the ENA Data Triage Playbook. This Playbook was updated in October 2025 to reflect the evolving landscape, and we welcome the iterative development work conducted by industry to improve triage and the understanding of risks balanced with benefits.

2.19 The triage process was always intended as a risk mitigation strategy, as open publication of ESD carries an inherent risk of misuse, which had to be balanced against the benefits of publication. It is appropriate to keep the triage process under review to keep pace with the evolving threat landscape and ensure the process remains in keeping with policy intent.

3. Three Possible Approaches

This policy consultation is proposing a significant change to the way data under DBP Guidance is triaged, with a view to increasing security and reducing the threat surface area in the evolving threat landscape. We propose three possible approaches, the Centralised Model, Hybrid Model, or Educational Model. This section explains and offers initial analysis for all three options and concludes with our minded to position.

3.1 Since 2023 Ofgem, DESNZ, the ENA and other organisations have been iteratively developing previous triage guidance and the triage processes, seeking to find an appropriate balance between securely managing risk and achieving the growth objective via opening data to wider use. Some changes from those multi-lateral engagements included the requirement to register for use of Open Data platforms, and the ENA Data Triage and Metadata Management Playbook[19]. While this work has increased security, in our view further changes are needed to keep pace with the evolving threat landscape.

Potential Models

3.2 This consultation proposes a step-change to the approach to triage with a view to mitigating risk without losing the proven benefits of Open Data. We invite views on the following three options:

- **The Centralised Model**: Here, we proposed that the triage function, technical standards, and responsibility are centralised. This role will be transferred from licensees to the proposed Digitalisation Coordination Function, who will develop and use robust triage guidance, and data triaged as 'open' will be published in a single platform, adjacent to the proposed DSI.
- **The Hybrid Model**: This model requires licensees to triage data using updated guidance, and to transfer all data to the Digitalisation Coordination Function, which will assess the triaged data (largely on an automated basis) - and reject it if not meeting guidance - before data triaged as open will be published in a single platform, adjacent to the DSI.
- **The Educational Model**: This model is closest to current practices, with licensees continuing to own the triage and publishing process, i.e. there will be

[19] ENA Data Triage and Metadata Management Playbook – Energy Networks Association (ENA)

no central platform or process. They would be supported by a series of triage courses for practitioners, and a suite of updated guidance materials to improve the application of security considerations in the triage process.

3.3 In both the Centralised and Hybrid Models the Digitalisation Coordination Function role and DSI are key components. When considering the risk profile for these, the security principles and design of the DSI are important to assure security of data. While the final design is currently under discussion with the relevant parties, the security principles have been published, and the design is being finalised to meet these principles. [20]

Scoring criteria and Methodology

3.4 When considering how to evaluate the potential efficacy of the three models, we have sought advice from security experts in both physical protection of infrastructure and cyber resilience. We collated triage guidance from existing sources, including the ENA Open Data Triage playbook, and engaged working groups with relevant parties.

3.5 While this engagement informed the high-level design of the three potential models selected and assisted with the selection of scoring criteria, the analysis was conducted by Ofgem, with review and guidance from external parties detailed in the previous paragraph.

3.6 In seeking to assess these three models, we have scored on the basis of the following criteria:

- Ownership/accountability
- Data security
- Data quality
- Cost
- Complexity of change

3.7 For each of the criteria we have provided a score of 1 to 5;

- Ownership / accountability – A score of 1 suggests an unclear legal basis for ownership of triage, and/or a highly distributed set of responsibilities. A score of 5 suggests a very clear legal basis for ownership of triage and/or a consistent set

[20] Interim DSI Coord 15_05_25 Open Letter Final.pdf

of responsibilities across multiple entities or a single entity with a comprehensive set of responsibilities.

- Data security – A score of 1 suggests that data security is not improved above the existing triage process, whilst a score of 5 suggests that data security has been upgraded to a point where there is a very low likelihood of sensitive data could be published under the new triage arrangements.
- Data quality – A score of 1 suggests that data quality is not considered as part of the triage process, whilst a score of 5 suggests that data quality is part of the triage process and data is at a very high level of quality.
- Cost – A score of 1 suggests a high cost for implementing and maintaining the new triage process, whilst a score of 5 suggests a low cost for implementing and maintaining the new triage process.
- Complexity of change – A score of 1 suggests a high level of complexity is introduced by the new triage process with a resource-intensive change process, whilst a score of 5 suggests a low level of complexity is introduced by the new triage process.

Question 2: Do you agree with the criteria underpinning the Options Analysis as described above?

Question 3: Would you suggest any other criteria that you would consider critical for analysis?

3.8 In analysing these options, we are mindful of the fact that risk cannot ever be truly removed[21]. Even if the DBP Guidance were to be removed, and the principle of 'presumed open' reversed, there will always be a certain amount of publicly accessible data which could be used to identify vulnerabilities. None of the proposed models can eliminate this risk, the proposal here is to modify the triage process to rebalance the benefits derived from open data with the risks as they are understood and developing at the point of publication of this document.

[21] The Orange Book Management of Risk – Principles and Concepts - GOV.UK

The Centralised Model

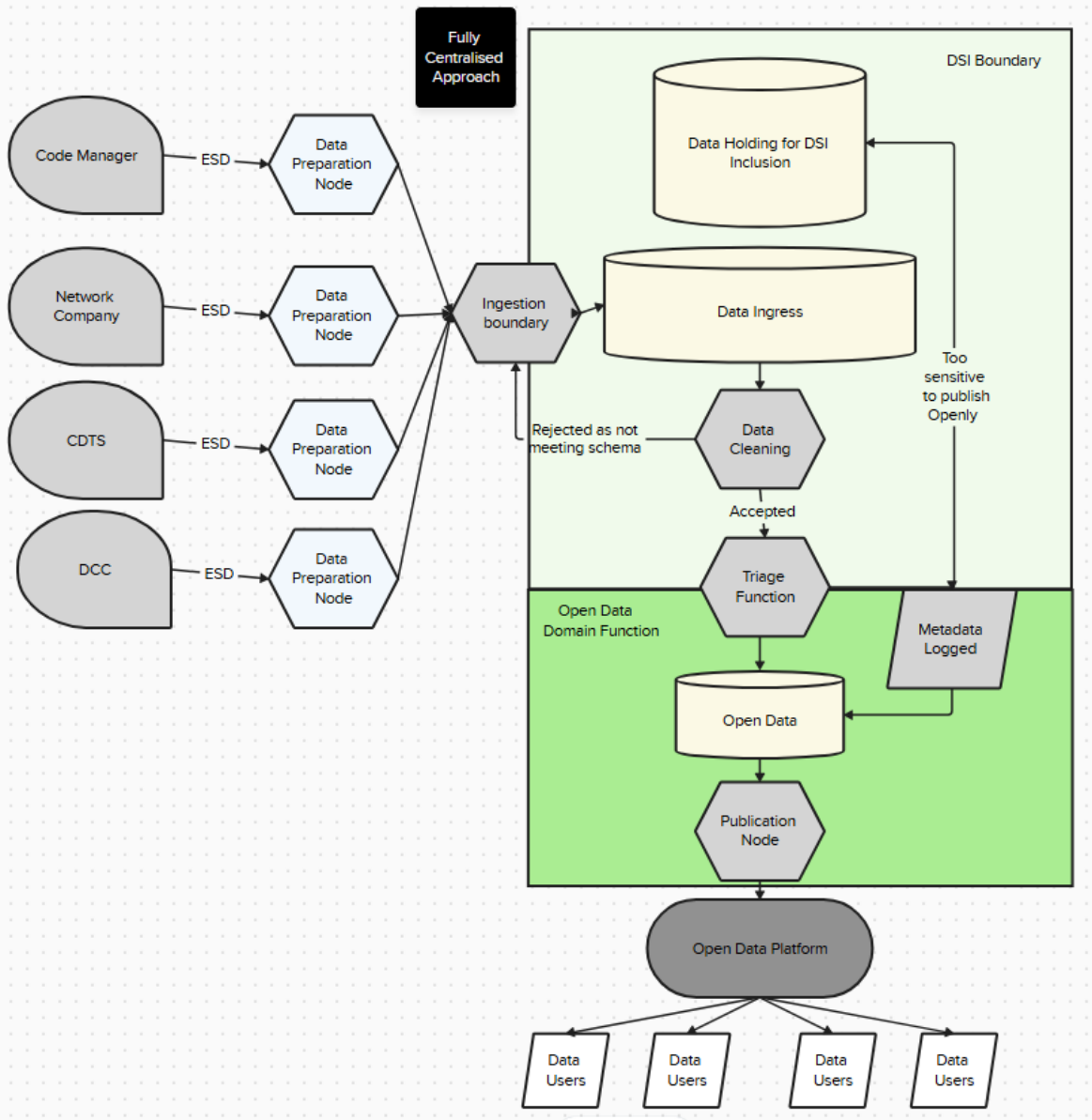


Figure 3: a process flow diagram showing the Centralised Model

3.9 The process flow diagram above shows how licensees would send ESD (untriaged) through their Data Preparation Node (DPN) across the Data Sharing Infrastructure (DSI), where it would be subject to Data Quality (DQ) review and then passed to a Triage Function within the Digitalisation Coordination Function. We would expect this Triage Function to be a role composed of digital tools, and trained personnel conducting triage review to a standard template.

3.10 In the event data was triaged and considered safe to publish, it would be published on a single central open data platform. In the event the data was – either on its own, or in combination with other published datasets – considered to present a risk, the metadata would be published (except in case of extreme

sensitivity, in which case the metadata itself may be deemed too sensitive to publish), and the dataset itself be returned to the data holder – the licensee – and (where appropriate) it would be added to the DSI registry of data items and services available to ensure it can be shared on a more limited basis if required. The DSI registry will be available to accredited users who are listed on the directory.

3.11 The purpose of publishing the metadata would be to allow legitimate data users to 'surface', or become aware of, the existence of datasets relevant to their interests, and to make inquiries for registration with the DSI to access this data, where they are entitled to do so. In cases where the metadata itself presents a sensitivity, the metadata would not be published and only accredited DSI users would be able to view the metadata.

3.12 This model would involve investment in governance, personnel, and IT systems by the Digitalisation Coordination Function, as described in the Energy Digitalisation Framework.[22] Currently this role has not been designated, but we would expect this to be an early priority for the selected delivery body, if this model is adopted. The triage function would require investment in personnel with concomitant IT spend and training costs. There will also be some expected IT spend to develop a suitable open data platform and ensure proper secure separation between this internet facing portal and the more secure environment of the DSI.

3.13 The proposal would increase the responsibilities of the Digitalisation Coordination Function to include the owning and operating of a single Open Data Platform. Whilst this has the potential benefit of improving interoperability, creating a single digital view of all ESD, and allowing for clearer lines of governance, there is an associated cost, and it would take time to design and adopt. Therefore, it is not regarded as a short-term solution.

3.14 The model should provide savings for the licensees, as the costs of triage and running an Open Data Platform would be reduced significantly. Furthermore, expansion of DBP obligations would present lower cost barriers and allow for smaller, less digitally experienced companies to contribute data and meet the requirements of DBP Guidance, whether through licence obligation or voluntarily. This would not remove the obligations on licensees to demonstrate adherence with other principles of DBP Guidance, or to produce Digitalisation Strategies and Action Plans (DSAPs)[23] .

[22] Energy digitalisation framework: a vision for a coordinated and connected energy system (accessible webpage) - GOV.UK
[23] Data Best Practice guidance | Ofgem

3.15 This model presents the furthest departure from the current Open Data Triage requirements, and the greatest degree of centralised control of triage, risk, and responsibility. Currently, each party obliged to follow DBP Guidance is responsible for its own diligence in conducting triage according to the Guidance – both from Ofgem in DBP Supporting Information and through the ENA's Playbook. The risk of data being inappropriately triaged and published currently rests with the licensee. This model would move responsibility for triage to the Digitalisation Coordination Function, presenting a substantial divergence from the current risk and governance ownership.

3.16 The advantage to this model is that a centralised triage function, held to consistent standards, reproducible and accountable processes, with a combination of digital validation and in-house personnel processing triage decisions, the risk of accidental over-publication is lowered. The use of the DSI increases cyber security and allows for quicker sharing of data deemed too sensitive to be openly published. Additional data utility benefits can be accrued through a single centralised portal, increasing interoperability, and allowing for data quality and schema validation as part of data processing, increasing the consistency of data offerings across the sector.

3.17 Our initial options assessment to allow for comparison of the three models is shown in the table below with each of the five criteria given a score between 1 and 5. These scorings are supported by a brief narrative of our view of the positive and negative impacts, reflected in the score.

3.18 Option assessment

Category	**Ofgem View**	**Score**
Ownership /Accountability	By centralising the process to a single company, risks around data triage can have an individual named risk owner, and a clear line of accountability through codified governance and guidance. However, ownership of the triage process places a significant burden on the Digitalisation Coordination Function, who may have legitimate concerns about the level of responsibility and associated legal and other risks.	3
Data Security	A single platform supported by a consistent triage process should eliminate the majority of accidental data publications, ensuring consistent decision-making underpinned by an agreed risk appetite. This will also enable	5

Category	**Ofgem View**	**Score**
	a single holistic view of all open data being published, which should ameliorate aggregation risk.	
Data Quality	Another benefit of the Centralised Model is that data quality checks and schema validation can be included in processing to allow for improved interoperability, data hygiene, and data quality.	4
Cost	This model will require significant investment in personnel, IT infrastructure, governance changes, legal input, and regulatory change. It is expected to be the most expensive and time-consuming model to develop.	1
Complexity	There are substantial hurdles to overcome in developing this model, and it will take a significant amount of time to implement. Regulatory change will be required, as will the designation of the Digitalisation Coordination Function, and this will be a factor in making that decision. There are multiple dependencies, including formalising governance and guidance documentation.	1
Total		14

Questions

Q4. Do you agree with our Option Assessment scoring and conclusion for the Centralised Model?

The Hybrid Model

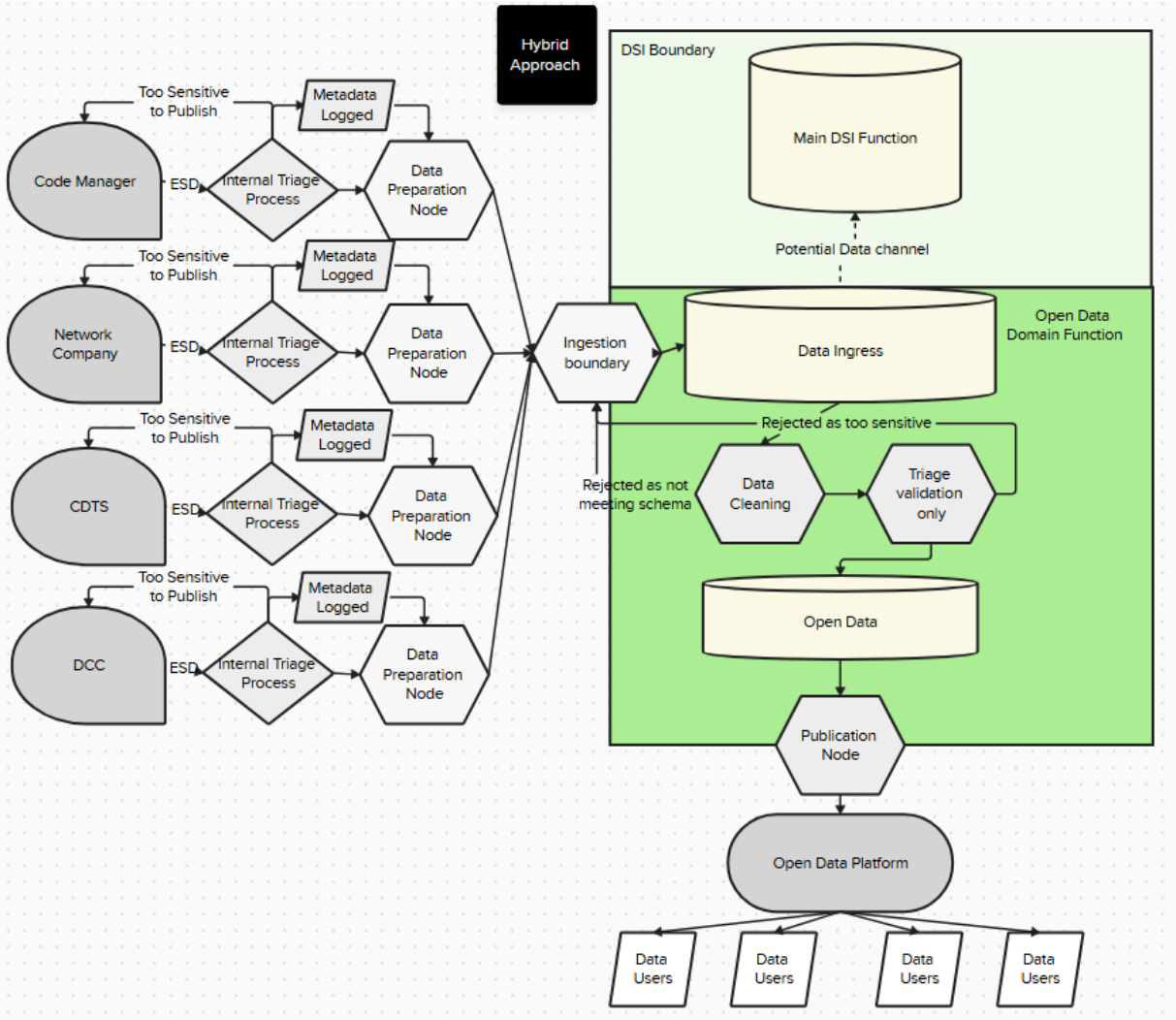


Figure 4: The process flow showing the Hybrid Model

3.19 The above diagram shows the proposed Hybrid Model. In this, licensees on the top left of the diagram are using a DPN to transfer the data to the Digitalisation Coordination Function for centralised publication, as with the Centralised Model. However, in this instance, each licensee first undertakes its own internal triage processes – following the revised DBP guidance but using internal processes and resources. If this data is triaged as safe to publish, it will be sent into the DSI and subjected to a further data quality and schema validation, before being checked via a digital triage validation tool, and rejected if it does not meet triage guidance. If a licensee triages the data as shared, it will follow appropriate routes for publishing that data. This will most likely be through the DSI.

3.20 The triage validation tool will be developed and owned by the Digitalisation Coordination Function and is envisioned to be a digital-only tool – potentially with a human check for any flagged data. It is intended to reinforce consistency of

triage process and identify any potential aggregation risks, or other publication risks, and is intended as a check step, rather than replacement for the licensee's own triage processes. If the data is deemed too sensitive to publish, it never leaves the licensees IT estate, and the metadata (except in case of extreme sensitivity, in which case the metadata itself may be deemed too sensitive to publish) is sent to the Digitalisation Coordination Function to undergo triage validation and potential publication.

3.21 This process has the advantage of both secondary checks to calibrate triage and of risk sitting with the organisation best placed to manage it. Licensees triage their own familiar data, and a secondary check can take a higher-level view, considering aggregation risk across all the data sets, as well as helping to ensure consistency.

3.22 As with the Centralised Model, data is published on a single central platform, with metadata available (where appropriate) to identify data which cannot be published.

3.23 Here the primary responsibility for triage remains with the licensee, as it does currently, with the digital validation tool providing limited additional assurance. This model requires the licensee companies to continue to practice triage. However, it does transfer the expense of publishing data on open data platforms to the Digitalisation Coordination Function. This will increase the responsibilities of the Digitalisation Coordination Function to include the owning and operating of a single Open Data Platform. This has the benefit of improving interoperability, creating a single digital view of all ESD, and allowing for clearer lines of governance. This model will necessitate a degree of spend from all parties, and a degree of governance, IT change, and similar expense distributed between parties.

3.24 There will be data utility benefits through centralised schema validation and data quality as before, as well as a new path to identify data through the published metadata.

3.25 This model will require a degree of change to governance procedures, and a degree of regulatory change to develop, although less than the Centralised Model. It similarly realises some but not all of the benefits and reflects lower cost and complexity. The presence of the central data platform and centralised data and triage validation reduces the resourcing burden of the licensees while increasing data utility but does not remove the requirement to publish DSAPs.

3.26 Our initial options assessment to allow for comparison of the three models is shown in the table below with each of the five criteria given a score between 1 and

5. These scorings are supported by a brief narrative of our view of the positive and negative impacts, reflected in the score.

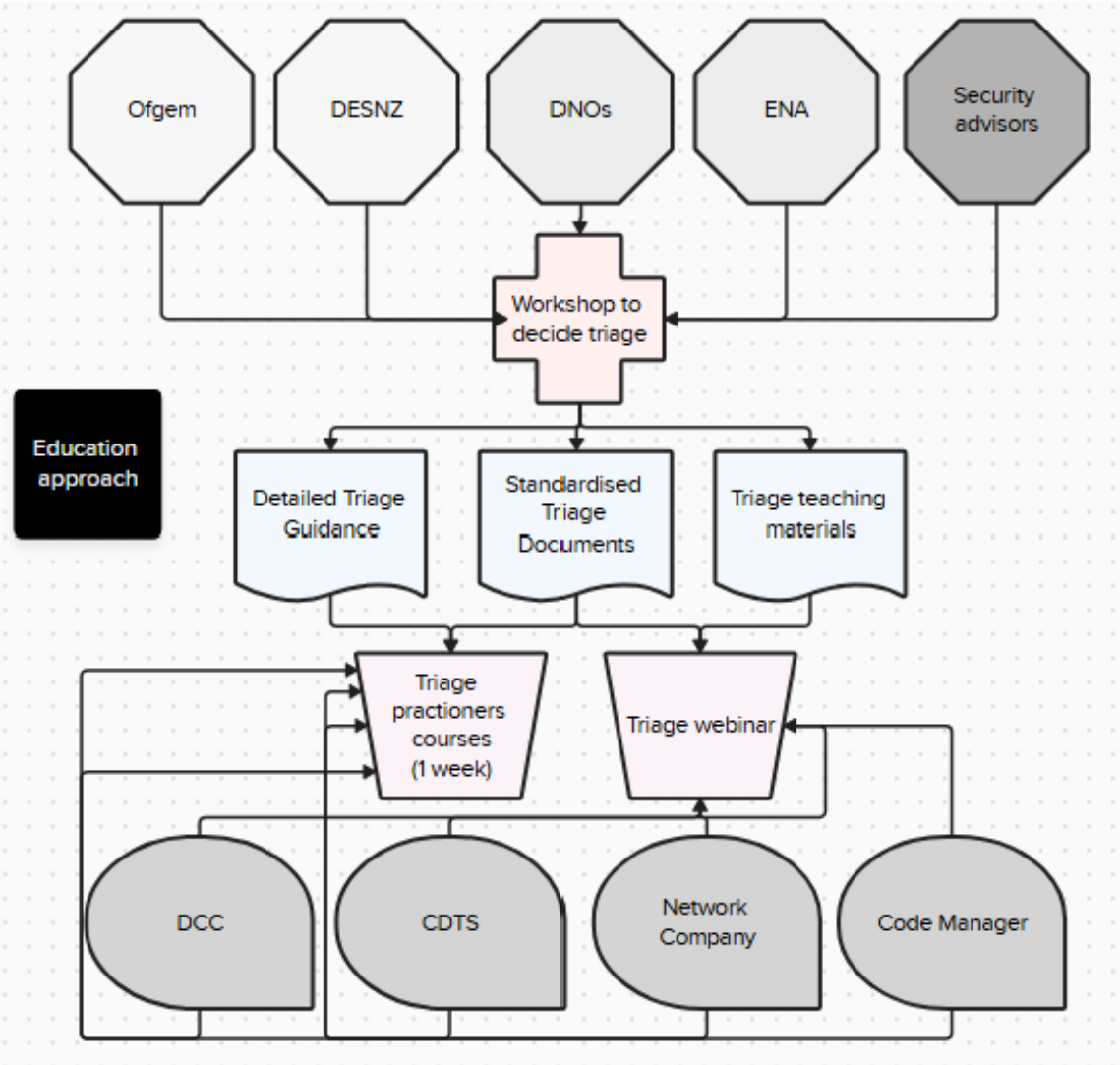
3.27 Option assessment

Category	**Ofgem View**	**Score**
Ownership /Accountability	Responsibility for inappropriately published data remains with the licensees, however there is still some burden to be carried by the Digitalisation Coordination Function. There will need to be governance processes in place to adjudicate on situations where data is triaged by a licensee as publishable but fails validation.	3
Data Security	Data security is increased through the use of validation, and the expected improvements in triage processing through the accompanying guidance changes, however it may not be as strong as the level of security provided by a personnel-based, centralised triage function.	3
Data Quality	Similar to the Centralised Model, the Hybrid Model benefits from the fact that data quality and schema validation can be included in processing to allow for improved interoperability, data hygiene, and data quality.	4
Cost	This model will require some investment in personnel, IT infrastructure, governance changes, legal input, and regulatory change. It is expected to represent the mid-range expense model.	3
Complexity	As with the Centralised Model, regulatory change will be required, as will the designation of the Digitalisation Coordination Function, and this model will be a factor in making that decision. There are fewer dependencies present in making these changes, and greater opportunity for stage development.	3
Total		16

Questions

Q5. Do you agree with our Option Assessment scoring and conclusion for the Hybrid Model?

The Educational Model



3.28 Unlike the two preceding models, the Educational Model requires no additional IT spend or centralisation of any function. It is closest to current practice and involves the licensees triaging data for suitability to publish and then publishing data which is deemed safe to do so on their own data portals.

3.29 The main difference between the educational model and the existing process is the creation of more detailed triage guidance, alongside standardised triage documentation and other specific training materials for triage practitioners. These materials would build upon the work carried out by the ENA in developing the Data Triage Playbook. They would also be reviewed from a security perspective by a working group consisting of DESNZ, Ofgem, network licensees/ENA and security personnel, and would be reflective of the current threat landscape, highlighting the potential risk to Critical National Infrastructure (CNI) presented by aggregated data. To ensure materials are kept relevant, we have requested a DESNZ Energy Security briefing to be added to relevant industry fora.

3.30 These materials would form the basis of a triage practitioners' course, and webinar which would be available for licensees to train their personnel to conduct triage with reference to the security risk in order to mitigate the risks that publication may present to the GB energy system.

3.31 As the least disruptive model proposed, this has the least cost and complexity to industry and could be accomplished most quickly. However, it may have less impact in terms of mitigating risk and improving data security. Unlike the more centralised approaches, which necessitate a single data platform, there will be no central data quality or schema validation; which may mean there is no improvement in data utility or interoperability. Responsibility for triage remains as is, as does most of the triage and publication process.

3.32 As the lowest intervention model discussed, this approach would require review and assurance work to ensure that the triage guidance was being followed. Licensees are obliged to make 'best endeavours' to follow DBP Guidance, meaning regulatory compliance action would underpin the assurance review.

3.33 Our initial options assessment to allow for comparison of the three models is shown in the table below with each of the five criteria given a score between 1 and 5. These scorings are supported by a brief narrative of our view of the positive and negative impacts, reflected in the score.

3.34 Option assessment

Category	**Ofgem View**	**Score**
Ownership / Accountability	Responsibility for inappropriately published data remains with the licensees.	2
Data Security	Data security will remain similar, but can be expected to improve to a degree due to the training materials, however no substantive change in process. Closest to BaU	2
Data Quality	Without centralised data quality, schema validation, etc there is not expected to be a measurable improvement, as the aim of the training materials is focused on security related triage, rather than data improvements.	1
Cost	This model will require minimal extra expenditure from industry, with the costs of training materials and courses needing to be provided from UKG sources. Costs are expected to be lowest of the three models.	4

Consultation Securing Open Data in Energy

Category	Ofgem View	Score
Complexity	This model is closest to BaU and is expected to be the least complicated to administer, requiring no regulatory change, and can be delivered the most quickly.	4
Total		13

Questions

Q6. Do you agree with our Option Assessment scoring and conclusion for the Educational Model?

Minded-to position

3.35 Our initial analysis has shown that the Hybrid Model scores highest with 16 as a combination of cost efficacy and impact in mitigating the anticipated risks. While the Centralised Model – which scored 14 - is potentially more robust in respect of the inadvertent disclosure of sensitive information, the cost and complexity (and therefore speed of delivery) create barriers and the question of the burden /level of responsibility for the Digitalisation Coordination Function must also be considered. The Educational Model has the advantage of presenting least disruption from the status quo, and consequently lowest cost and complexity, however as a lighter touch intervention, it may not to address the complex and evolving threat landscape, and was scored the lowest, at 13.

3.36 As such, our minded to position is to take the Hybrid Model approach.

3.37 With regards costings, network companies operating under RIIO3 price controls for Electricity Transmission, Gas Transmission, and Gas Distribution have put in business cases averaging £15.5m to meet their obligations under DBP Guidance and will, under the Hybrid Model, expect to see reduced costs due to no longer having the expense of maintaining an Open Data Portal. In the event of a change of triage process, we would expect to see some of these funds being redirected towards more comprehensive and funded triage processes reflecting the updated Guidance produced. If additional funding is needed to fulfil any new obligations stemming from policy changes, the Digitalisation reopener can be utilised. During the process of this consultation, and any implementation periods after a decision, we expect licensees to continue to meet their obligations under DBP Guidance.

3.38 It is expected that there will be cost implications for the Digitalisation Coordination Function. While the entity to fill this role is not yet selected, any costings will be considered as part of any business plans.

3.39 Other licensees, such as the Carbon Dioxide Transport and Storage Licensees, Smart Meter Communication Licensee, and future Code Manager Licensees will face reduced regulatory costs due to no longer having to create and maintain an Open Data portal.

3.40 We acknowledge that the future Digitalisation Coordination Function is crucial here, should the Hybrid or Centralised Model be selected, and we will work with DESNZ to ensure that the delivery of the decisions set out following this consultation form part of the criteria to select the Digitalisation Coordination Function.

3.41 Regardless of which model is selected, there will have to be an underlying monitoring and remediation process to ensure that the level of triage and risk mitigation is appropriate to the evolving threat picture. This will include iterative development of triage guidance, including a focus on system security and the impact of data release and aggregation on system-level and network-level security. This will require a concerted and collegiate effort from Ofgem, DESNZ, and security services to ensure the policy intent of fostering growth is balanced with proportionate precautions.

Questions

Q7. Do you agree with our minded to position? If not, what is your view as to the best approach to this issue?

4. Conclusions and next steps

4.1 This consultation will run from 31 May 2026 until 14 July 2026. We commit to analysing the responses as soon as practicable, acknowledging that the nature of the changed risk environment necessitates working at pace to deliver these changes.

4.2 During the consultation window, we will work with DESNZ and security agencies to ensure DBP Triage Guidance – both the ENA Playbook and DBP Supporting Information – is updated and developed. Regardless which model is preferred by respondents to this consultation, our intention is to update the Data Best Practice Triage Guidance in order to reflect changes in the threat landscape.

4.3 Following analysis of responses, we commit to packaging the responses to this Policy Consultation in with the Statutory Consultation, and publishing the specific detail, legal text, and changes to the relevant licences at pace.

Send us your feedback

We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this consultation. We would also like to get your answers to these questions:

- Do you have any comments about the quality of this document?
- Do you have any comments about its tone and content?
- Was it easy to read and understand? Or could it have been better written?
- Are its conclusions balanced?
- Did it make reasoned recommendations?
- Do you have any further comments?

Please send your feedback to stakeholders@ofgem.gov.uk.

Appendix 1. Linked Publications

- Ofgem. (2024). Data Best Practice Guidance.
    - https://www.ofgem.gov.uk/sites/default/files/2025-11/Data_Best_Practice_Guidance_CLEAN%26ACC.pdf
- Ofgem. (2024). Data Best Practice Supporting Information.
    - https://www.ofgem.gov.uk/sites/default/files/2025-11/Data_Best_Practice_Supporting_Information_CLEAN%26ACC.pdf
- Ofgem. (2024). Digitalisation Strategy and Action Plan Guidance.
    - https://www.ofgem.gov.uk/sites/default/files/2025-11/Digitalisation_Strategy_and_Action_Plan_Guidance_CLEAN%26ACC.pdf
- Ofgem. (2024). Digitalisation Strategy and Action Plan Supporting Information.
    - https://www.ofgem.gov.uk/sites/default/files/2025-11/Digitalisation_Strategy_and_Action_Plan_Supporting_Information_CLEAN%26ACC.pdf.
- BBC. (2026) Berlin power outage highlights German vulnerability to sabotage.
    - https://www.bbc.co.uk/news/articles/cvgrpzn6gz4o.
- Ofgem. (2025). Energy digitalisation governance: architectural coordination.
    - https://www.ofgem.gov.uk/policy/energy-digitalisation-governance-architectural-coordination
- Ofgem. (2026). Forward Work Programme.
    - https://www.ofgem.gov.uk/sites/default/files/2026-03/Forward-Work-Programme-2026-to-2027.pdf
- UK Parliament. (2023). Local area energy planning: achieving net zero locally.
    - https://researchbriefings.files.parliament.uk/documents/POST-PN-0703/POST-PN-0703.pdf.
- UKPN. (2026). Your Local Net Zero Hub.
    - https://www.yourlocalnetzerohub.co.uk/home.
- UKPN. (2026). Open Data Portal Reuses.
    - https://ukpowernetworks.opendatasoft.com/pages/reuses
- IEA. (2024). Ukraine's energy system under attack.
    - https://www.iea.org/reports/ukraines-energy-security-and-the-coming-winter/ukraines-energy-system-under-attack.
- Tagesschau. (2026). Coalition wants to better protect critical infrastructure.
    - https://www.tagesschau.de/inland/innenpolitik/koalitonsausschuss-infrastruktur-100.html.
- data.europa.eu. (2019). Open energy data on the European Data Portal.

    - https://data.europa.eu/en/publications/datastories/open-energy-data-european-data-portal.
- Energy Networks Association (ENA). (2025). ENA Data Triage and Metadata Management Playbook.
    - https://www.energynetworks.org/publications/ena-data-triage-playbook.
- National Energy Systems Operator (NESO). (2026). System Frequency.
    - https://www.energynetworks.org/publications/ena-data-triage-playbook.
- National Energy Systems Operator (NESO). (2026). Systems Inertia.
    - https://www.neso.energy/data-portal/system-inertia.
- NUAR. (2026.) National Underground Asset Register.
    - https://www.nuar.uk/.
- HM Treasury. (2025). The Orange Book Management of Risk-Principles and Concepts.
    - https://www.gov.uk/government/publications/orange-book/the-orange-book-management-of-risk-principles-and-concepts#annex-2-the-three-lines-model.
- Ofgem. (2026). Energy digitalisation framework: a vision for a coordinated and connected energy system.
    - https://www.gov.uk/government/publications/energy-digitalisation-framework-a-vision-for-a-coordinated-and-connected-energy-system/energy-digitalisation-framework-a-vision-for-a-coordinated-and-connected-energy-system-accessible-webpage.
- Ofgem. (2025). Data Best Practice as a Code Obligation.
    - https://www.ofgem.gov.uk/consultation/data-best-practice-code-obligation.

Appendix 2. Glossary

Term	Definition
Balancing and Settlement Code (BSC)	The Balancing and Settlement Code contains the rules and governance arrangements for electricity balancing and settlement in Great Britain. This code is administered by Elexon.
Balancing Services Use of System (BSUoS)	Charges that are paid by electricity suppliers and generators based on the energy taken from or supplied to the transmission system in each half-hour settlement period. It varies for each settlement period and recovers all of the costs associated with the Electricity System Operator's actions to balance the transmission system.
Closed Data	Data is only available within the Data Custodian's organisation, and it may be limited even within that.
Critical National Infrastructure	Critical elements of infrastructure (namely assets, facilities, systems, networks or processes and the essential workers that operate and facilitate them), the loss or compromise of which could result in: a) major detrimental impact on the availability, integrity or delivery of essential services – including those services whose integrity, if compromised, could result in significant loss of life or casualties – taking into account significant economic or social impacts; and/or b) significant impact on national security, national defence, or the functioning of the state.
Data Asset	Any entity that is comprised of data. For example, a database is a data asset that is comprised of data records. A data asset may be a system or application output file, database, document, or web page. A data asset also includes a service that may be provided to access data from an application. For example, a service that returns individual records from a database would be a data asset. Similarly, a website that returns data in response to specific queries would be a data asset. This definition is taken from the National Institute of Standards and Technology (NIST).

Data Best Practice Guidance	Principles and expectations for licensees to follow when preparing Digitalisation Strategies and Action Plans. Part of Ofgem's standards for data and digitalisation.
Data Sharing Infrastructure	The technical and governance systems that enable secure, standardised, and permissioned exchange of energy data between different parties.
Digitalisation Coordination Function	A technically competent, independent entity responsible for ongoing coordination of digitalisation initiatives, and shaping and maintaining the sector's overarching digital architecture. DESNZ will consult on which organisation will take on this role in late 2026
Energy Digitalisation Framework	The Energy Digitalisation Framework (March 2026) is a joint government and Ofgem publication which sets out a clear, coordinated approach to energy system digitalisation, providing clarity, coherence and direction to the digitalisation landscape. It includes objectives, principles and governance arrangements for digitalisation initiatives moving forwards.
Energy System Data	Data which describes the energy system and its operation (current, historic and forecast), including the presence and state of infrastructure, operation of the system, associated market operations, policy and regulation.
Open Data	Available for all stakeholders to use, modify and distribute with no restrictions.
Metadata	Data that provides information about a dataset that makes tracking and working with multiple datasets easier.
Shared Data	Available to a limited group of stakeholders possibly with some restrictions on usage.

Appendix 3. Privacy policy

Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, "Ofgem"). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

All responses which are not clearly marked as 'Confidential' will be published on the Ofgem website alongside this consultation in the interests of transparency. If you wish your response to be confidential, whole or in part, please clearly mark the parts you consider confidential. Responses marked as confidential may be anonymised or summarised in order to share views with other government departments/

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for up to seven years after this consultation is closed to allow for any legal challenge or review to be properly evidenced.

6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data

- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at https://ico.org.uk/, or telephone 0303 123 1113.

7. Your personal data will not be sent overseas

8. Your personal data will not be used for any automated decision making.

9. Your personal data will be stored in a secure government IT system.

10. More information For more information on how Ofgem processes your data, click on the link to our "ofgem privacy promise".