Re: Ofgem consultation “Proposed Code Manager Standard Licence Modifications relating to Data Best Practice”

Dear All,

I am pleased to support this proposal. It is all too easy to be quiet when good work is done, so I wanted to take the time to affirm my support for this work through this response.

I appreciate that the original consultation process for determining the suitability of Data Best Practice (DBP) guidance and Digitalisation Strategy and Action Plan (DSAP) guidance as applicable to code managers took place previously and that this consultation is more focused on determining an alternative mechanism for implementing the obligation, but I didn’t have the time to reply to that previous consultation.

Arguably left understated at the time in 2021, when DBP guidance and the DSAP guidance were first introduced for network companies the foundational purpose of these regulations was to ensure that a natural data monopoly’s data is ‘put to best use’ (along with processing methods associated with making that data fit for general use). This extension of DBP and DSAP to apply to code managers aligns with that purpose as code managers can well be described as natural data monopolies.

In the main body text, I have provided suggestions intended to help adoption of these two sets of guidance and the provision of associated services. Principally, the suggestions are intended to help:

(1) encourage digitalisation of governance and programme management information

(2) accelerate progress at delivering to the expectations of DBP and DSAPs

(3) Make open data more effective

Regards,



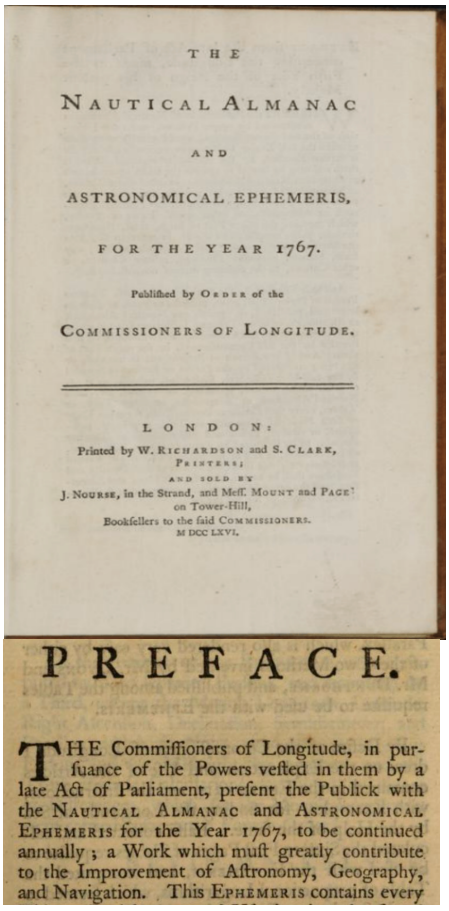
Steven Steer,

concerned citizen[1]

[1] *Disclosure: I am a former member of Ofgem staff (2016 – 2021). Topics discussed in this response relate directly to areas of work I was involved in during that tenure, specifically including the original creation of the Data Best Practice and the Digitalisation Strategy and Action Plan guidance.*

[1] Images from https://journeys.dartmouth.edu/digitalexhibition/nautical-almanac/ and https://en.wikipedia.org/wiki/Lunar_distance_%28navigation%29. See the original almanac here: https://books.google.co.uk/books?id=8f4NAAAAQAAJ&pg=PP5#v=onepage&q&f=false

On open data saving lives and unlocking economic growth



THE

NAUTICAL ALMANAC

AND

ASTRONOMICAL EPHEMERIS,

FOR THE YEAR 1767.

Published by ORDER of the

COMMISSIONERS OF LONGITUDE.

LONDON:

Printed by W. RICHARDSON and S. CLARK, PRINTERS;

AND SOLD BY

J. NOURSE, in the Strand, and Mess. MOUNT and PAGE on Tower-Hill,

Bookfellers to the said COMMISSIONERS.

M DCC LXVI.

PREFACE.

THE Commiſſioners of Longitude, in purſuance of the Powers veſted in them by a late Act of Parliament, preſent the Publick with the NAUTICAL ALMANAC and ASTRONOMICAL EPHEMERIS for the Year 1767, to be continued annually; a Work which muſt greatly contribute to the Improvement of Aſtronomy, Geography, and Navigation. This EPHEMERIS contains every

The first nautical almanac, 1767. Its open data tables published in Greenwich helped save sailor's lives globally at sea[1]

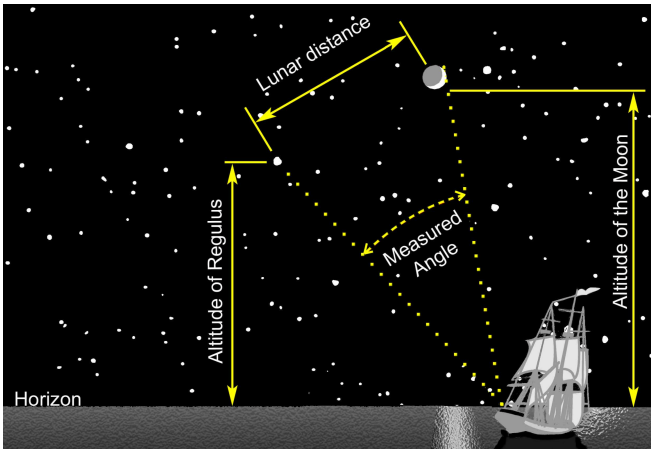
The stable - and altogether rather convenient - location of Polaris (the North Star) has for centuries helped ship crews to determine their latitude through their measuring the angle of Polaris above the horizon. Meanwhile, determining ships' longitudinal (East-West) location was altogether more complex.

The Earth spins every 24 hours and so 1 hour difference in time of day equates to 15 degrees of the 360 degrees of longitude needed to circumnavigate the Earth. 'High' noon at sea would be 45 degrees away from Greenwich if its local time is 3 hours earlier, 9AM.

This makes knowing longitude seemingly simple: the difference in time of day where you are sailing versus a Greenwich local clock that you bring on your journey tells you your longitude. It was easy to determine local time (noon is when the sun hits its zenith); unfortunately, the pendulums and cogs of history's clocks didn't work well on the rigours of the high seas and before long your Greenwich clock became dangerously unreliable.

Following centuries of crew deaths, lost cargo and sunk ships, Nevil Maskelyne, Astronomer Royal at Greenwich, innovated and published the Nautical Almanac. The almanac's data tables served as one of history's 'APIs'. He pre-measured the complex movements of the relative position of the moon against the stars for different times of day at local Greenwich time. This open data made sailing safe and accelerated economic growth: the world's intrepid traders and explorers used the almanac data and their own observations of the moon to determine Greenwich local time and in turn learn their longitudinal location.

There is a shared societal interest in simple data (like having shared knowledge of the time of day) and also in complex data (like documenting an almanac about the movement of the moon against the stars). Modern socially important and complex data needs take many forms. One form is shared knowledge of information about infrastructure systems like an energy system. If today's traders and explorers are to be made able to navigate and understand their 'longitude' as they 'sail' within the cyber-physical energy system then they need an 'almanac' to guide them as they trade and discover to meet new people and grow the economy.



DBP and DSAP set expectations for unique actors to provide modern navigation almanacs.

[1] Images from https://journeys.dartmouth.edu/digitalexhibition/nautical-almanac/ and https://en.wikipedia.org/wiki/Lunar_distance_%28navigation%29. See the original almanac here: https://books.google.co.uk/books?id=8f4NAAAAQAAJ&pg=PP5#v=onepage&q&f=false

On good quality implementation of DBP and DSAP

The following are recommendations for how the intents of DBP and DSAP can best be realised:

- Participating parties could help by authoring their DSAP in 'AI-native' formats first and then derive versions for human consumption from these (i.e. write the DSAP in formats like .md files that are easier for computers to interpret and then run procedures to produce a human-friendly version). This will help consumption of DSAPs to become more automated and therefore drive market efficiencies.
- Take an expansive view of 'data'. Unstructured data can be as valuable as structured data. Your policies, programme management information and reports are valuable and should be in formats easy for computers to consume where there is consumer demand for this.
- Don't be shy about publishing data on the basis that the 'quality isn't good enough yet'. Your external data consumers know what they want to use the data for and are the best placed to judge quality needs. Putting data in front of consumers early will rapidly teach you quality needs. This will stop over and under investments in data quality, optimising spend to value.
- Publish metadata: it is inherently less sensitive and it provides a practical way for data consumers to learn what data you hold that might be of value to them.
- Operationalise an approach of sharing data triage work with other organisations: this will help with calibrating concerns such as evaluating security sensitivities, learning new methods for data desensitisation and with understanding risks by aggregation.
- Lead by example: Ofgem is a 'natural data monopoly' too. By following its own guidance the regulator will help the market understand regulatory information and methods and it will also give the regulator vital experience that will aid its monitoring and enforcement work as it sets expectations on market participants.

[1] Images from https://journeys.dartmouth.edu/digitalexhibition/nautical-almanac/ and https://en.wikipedia.org/wiki/Lunar_distance_%28navigation%29. See the original almanac here: https://books.google.co.uk/books?id=8f4NAAAAQAAJ&pg=PP5#v=onepage&q&f=false