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Jacqui Russell Head of Metering and Market Operations Ofgem 10 South Colonnade Canary Wharf London E14 4PU

To Jacqui,

ElectraLink response to Ofgem's Call for Evidence: Review of the Regulatory Arrangements for the Data Communications Company

ElectraLink welcomes the opportunity to respond to Ofgem's 'Call for Evidence: Review of the Regulatory Arrangements for the Data Communications Company (DCC)'. ElectraLink agrees that it is important for industry to comment on the future role of the DCC and we agree that the role of the DCC will be a key enabler for net-zero by 2050.

Whilst there are a variety of aspects of the DCC's regulatory framework that are to be considered by Industry, ElectraLink would like to respond to the Call for Evidence to discuss "the extent to which the regulatory framework should enable DCC to offer additional services to the broader energy sector, and to non-energy sector users, and the potential nature of such services". As the service provider for the Energy Market Datahub (EMDH), ElectraLink would like to provide evidence to highlight the opportunities and challenges with providing additional services, such as data insights, as a central data provider. ElectraLink has experience of providing additional services from a central position without creating monopolistic restrictions on who/what services we provide to industry and we would like to offer our expertise on how, through data controller centric governance and oversight, innovation can be facilitated by central bodies.

Our detailed evidence is outlined in Appendix 1. ElectraLink supports the belief that there will be benefits to expanding the role of the DCC; however, we believe that, for these benefits to be realised, the following needs to be true and evidenced for any additional services provided by the DCC:

- A flexible regulatory framework that has been agreed and be managed with the data controllers in mind, such as that provided by the DTSA¹
- More open/democratised data, supported by an agile data triage process such as the data triage process for the DTS Dataset developed in 2012
- A positive or net zero consumer benefits case
- The most cost-effective option for surfacing data, therefore not duplicate existing services, as exemplified through the Flexr Project²
- It does not foreclose markets, restrict the opportunities for the market to provide these services themselves, or be a blocker to innovation

² Flexr - ElectraLink



bsi. ISO ISO ISO ISO ISO/IEC 27001 Information Security Management Management ISO/IEC 27001 Information Security Management

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¹ The Data Transfer Service (DTS) has a flexible governance structure defined in the <u>Data Transfer Service Agreement</u> (DTSA) that outlines the scope of ElectraLink's role in the energy market.



Further engagement

Alongside our response to this call for evidence, we will also welcome the opportunity for further engagement with Ofgem regarding our response and would welcome the opportunity to engage in any future workshops. As the responses to this Call for Evidence improve the understanding of industry needs, ElectraLink is keen to support and work with Ofgem and the DCC to understand how the evolution of the DCC role can be achieved. Based on our experience over the last 20 years, we can add significant value and insights into establishment of a robust, yet flexible governance arrangement to enable the development of the DCC role.

Thank for you for the opportunity to respond. Should you require any additional information or if you have any questions, please contact Dan Hopkinson (<u>dan.hopkinson@electralink.co.uk</u>) in the first instance.

Many thanks

Dan Hopkinson

Acting CEO

