

Consultation on the Form of Long Term Development Statement		
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This document initiates an informal consultation process on a new Form of Long Term Development Statement (FoS) for the Distribution Network Operators' (DNOs). The FoS has been updated to include a requirement for the provision of grid model data using the Common Information Model (CIM) data standard and the inclusion of capacity heatmaps in a common format, as part of the Long Term Development Statement (LTDS), to ensure interoperability and to maximise the opportunity for users to access network data and gain insights.

We would like to hear stakeholder views on the revised FoS, particularly from those people and organisations with an interest in connecting to and using the electricity distribution network in the future, developers and users of software applications that need access to network data and innovators and developers of smart products and services that require network data. We also welcome responses from other stakeholders and the public.

This document outlines the scope, purpose and questions of the informal consultation and how you can get involved. Once this informal consultation is closed, we will consider all responses. We want to be transparent in our consultations. We will publish the nonconfidential responses we receive alongside a decision on next steps on our website at ofgem.gov.uk/consultations. If you want your response – in whole or in part – to be considered confidential, please tell us in your response and explain why. Please clearly mark the parts of your response that you consider to be confidential, and if possible, put the confidential material in separate appendices to your response.

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Contents

Executive Summary	
Introduction	5
LTDS Reforms Working Group	5
What are we consulting on?	5
Form of Long Term Development Statement	
Annex 1: LTDS Data Exchange Specifications	
Annex 2: LTDS Grid Modelling Guidelines	
LTDS Phased Implementation Requirements	8
Context and related publications	
Consultation stages	٥
consultation stages in	
How to respond	
-	10
How to respond	10 10
How to respond Your response, data and confidentiality	 10 10 11
How to respond. Your response, data and confidentiality General feedback	
How to respond	

Executive Summary

Digitalisation is imperative to meeting the Government's climate change ambitions and supporting the transition to a low carbon energy system at lowest cost to energy consumers. For the benefits of digitalisation to be realised, data must be standardised and interoperable, enabling network operators to transfer information effectively and simply to data users, in order that they can make informed decisions.

The reforms to the LTDS that we are informally consulting on, are described in a new FoS which includes an additional requirement for grid model data to be provided using the CIM, a common data standard that will be used for all relevant licensed network data exchanges in the future. The reforms to the LTDS will therefore not only improve this dataset, but will embed the core use of the CIM as the base standard for data sharing for other energy system datasets in the future.

This informal consultation seeks views on the requirements of the new FoS and the proposed implementation plan. There will be an opportunity to participate in a stakeholder workshop during this informal consultation period and stakeholder responses will be taken into consideration prior to a formal consultation process in accordance with the requirements of paragraph 25.6 of the standard conditions of the Electricity Distribution Licence, later in the year.

Introduction

- 1.1 The preparation and maintenance of a publicly available LTDS, is a long standing obligation on DNOs, mandated through a direction, pursuant to paragraph 25.2 of the standard conditions of the Electricity Distribution Licence and described in detail in the FoS.
- 1.2 The purpose of the LTDS is to provide those wishing to connect to or use the distribution network, with the detailed network information that they need to identify and evaluate opportunities.
- 1.3 We are informally consulting on a new FoS, the document that describes the minimum requirements for the LTDS, which now includes additional requirements for grid model data to be provided using the CIM and for the publication of Capacity Heatmap data.

LTDS Reforms Working Group

- 1.4 The technical requirements described in the new FoS and associated annexes and appendices, have been developed by the LTDS Reforms Working Group (LTDS WG); a group of experts with representation from DNOs, the ESO, end users, software vendors and academics.
- 1.5 In April 2023, the LTDS WG concluded its work, delivering a proposed set of data standards that will implement the CIM for network grid models. These standards are annexed to the updated FoS and form part of this informal consultation.
- 1.6 The benefits of these reforms go well beyond the LTDS dataset. The LTDS requires digitalisation, not only to increase the volume and content of data, but to meet the interoperability needs of data users. The reforms therefore present a clear opportunity not only to improve this dataset, but to use a common data standard that will become a requirement for all relevant licensed network data exchanges in the future, driving commonality, standardisation and interoperability across network planning data and setting the course for wider adoption across the energy system.

What are we consulting on?

1.7 We are informally consulting on a new FoS, LTDS data exchange specifications, LTDS grid modelling guidelines and associated appendices and the requirements for phased implementation as described in the LTDS Phased Implementation Requirements document. We will gather stakeholder views on these documents through this initial informal consultation process, seeking feedback on the proposals and implementation considerations. This will be followed by a formal consultation process in accordance with the requirements of paragraph 25.6 of the standard conditions of the Electricity Distribution Licence later in the year and ultimately result in a new direction to licensees mandating the adoption of the revised FoS.

The documents included in this informal consultation are as follows;

- FoS
- Annex 1: LTDS Data Exchange Specifications
- Annex 2: LTDS Grid Modelling Guidelines
- Template LTDS Appendices
 - \circ Appendix 2 LTDS Information Model Diagrams and Descriptions
 - Appendix 3 Profile Classes and Attributes
 - Appendix 4 LTDS Layered Profiles
 - Appendix 5 Short Circuit Result Profile
 - Appendix 8 Equivalent Infeed Impedance Calculations
 - Appendix 9 LTDS Constraint Descriptions

Note: LTDS Appendices 1, 6 & 7 do not have templates but are defined alongside the Appendices above in Annex 3: Grid Modelling Guidelines.

- LTDS Phased Implementation Requirements

The following sub-sections provide a high level summary of the content of each of the above documents and include certain specific questions that we would like stakeholders to consider and respond to.

Form of Long Term Development Statement

- 1.8 The FoS is the overarching document that sets out the requirements for the LTDS and refers to other guidance and specifications as necessary.
- 1.9 It describes the six constituent parts of the LTDS in detail and specifies certain general requirements, including the format and accessibility of the LTDS and the frequency of updates.
- 1.10 The updated FoS includes two new sections, as follows:`
 - 'Grid Modelling' this describes the requirement for the provision of grid model data which is intended to enable the use of steady state network analysis studies of portions of the GB distribution grid, both within and across DNO licence areas, to evaluate potential grid connection opportunities and to

provide supplemental information that can be used in conjunction with study results to further refine the evaluation of potential connection requests.

- 'Capacity Heatmaps' this section describes the requirements for integrating heatmaps into the LTDS and the data standards that should be used.
- Q1. Do you have any comments on the updated FoS?
- Q2. Do you believe that the inclusion of grid model data, as described in the Grid Modelling section will enable more detailed connection studies?
- Q3. Is there any data that is not included within the updated FoS that would be helpful for users?
- Q4. Would you suggest any changes to existing datasets that will continue to be provided as set out in the Implementation Requirements?
- Q5. Changes have been made to the requirements for DNO Embedded Capacity Registers (ECR) following the formal decision on DCP 399 published on 9th June 2023. These changes lower the threshold for entries to the ECR from 1MW to 50kW and clarify the reporting of demand side response (DSR). We are minded to align the requirements of the LTDS and ECRs in respect of the 50kW threshold and the reporting of DSR. Do you support this proposed alignment and do you have any other comments on the interface between the ECR and LTDS?

Annex 1: LTDS Data Exchange Specifications

- 1.11 The LTDS Data Exchange Specifications have been developed by the LTDS WG. The document outlines the information model, profile and serialisation requirements for the data exchanges of the proposed LTDS CIM revision.
- 1.12 This specification was published¹ by Ofgem alongside the LTDS grid modelling guidelines on 14th July 2023, as outputs of the LTDS WG.

Annex 2: LTDS Grid Modelling Guidelines

- 1.13 The LTDS Grid Modelling Guidelines have been developed by the LTDS WG. This document overviews the grid modelling approach and details the grid model data requirements of the proposed LTDS CIM revision.
- 1.14 This specification was published¹ by Ofgem alongside the LTDS data exchange requirements on 14th July 2023, as outputs of the LTDS WG.

¹ <u>https://www.ofgem.gov.uk/publications/outputs-long-term-development-statement-reforms-working-group</u>

LTDS Phased Implementation Requirements

- 1.15 This document sets out the expectations for implementing the new LTDS requirements. The approach that we are informally consulting on is a two stage implementation, with the first deliverables at the end of May 2024 and full adoption of the revised LTDS by the end of November 2024, as further summarised below with required outputs at each stage. More detail can be found in the supporting document forming part of this informal consultation titled: 'LTDS Phased Implementation Requirements'.
 - Phase 1 (31 May 2024):
 - (1) The complete existing LTDS publication (narrative and tables)²
 - (2) A modified revised LTDS in CIM, and
 - (3) The complete Capacity Heatmap publication.

• Phase 2 (30 November 2024)

(4) The complete existing LTDS publication (narrative and tables)

(5) The complete revised LTDS in CIM, and

- (6) The complete Capacity Heatmap publication.
- Q6. Do you believe that the phased implementation requirements strike the right balance between pace and deliverability?

Context and related publications

- 1.16 The work underway to modernise and digitalise the DNO's LTDS, of which this informal consultation is a key part, is a foundational step in enabling a net zero energy system, addressing the interoperability of network data.
- 1.17 The LTDS requirements were last updated in 2011³, requiring data to be provided as a set of tables in Microsoft Excel spreadsheets. Although helpful to some users, there is a clear need for machine readable data to support users who want to automatically ingest the data and analyse it with software tools.

 $^{^{\}rm 2}$ Meaning the version of the LTDS based on the existing FoS, published at the end of November 2023

³ <u>https://www.ofgem.gov.uk/publications/direction-pursuant-paragraph-252-electricity-</u> <u>distribution-licence-relating-preparation-and-maintenance-long-term-development-</u> <u>statement</u>

- 1.18 In 2019, Ofgem consulted on the DSO programme of work and the LTDS⁴, to understand any reforms needed to enable the transition to a net zero energy system.
- 1.19 Following that consultation, Ofgem set out the next steps for progressing the reforms of the LTDS⁵. The reforms commenced in August 2021 and aimed to improve network visibility and support an effective connection regime for distribution level resources. To achieve this the LTDS WG was established to update the technical LTDS requirements ensuring that network planning data be in a standardised and machine readable format. The outputs from the LTDS WG were published on 14th July 2023⁶ and form part of this informal consultation on a revised FoS.

Consultation stages

- 1.20 We are consulting on the FoS in two stages; this informal consultation followed by a formal consultation process in accordance with the requirements of paragraph 25.6 of the standard conditions of the Electricity Distribution Licence.
- 1.21 We plan to hold a virtual workshop on the morning of Tuesday 12th September 2023, where interested parties can meet with members of the LTDS WG and others involved in the development of the updated FoS, to understand more about the proposed changes and to provide their feedback, as part of this informal consultation. This will provide an opportunity for detailed discussions on specific technical points as well as the broader intent and implementation plan. We will consider holding a second workshop if there is sufficient interest.
- 1.22 Figure 1 below summarises these stages and the expected timescales for subsequent stages of the consultation process.

⁴ <u>https://www.ofgem.gov.uk/publications/key-enablers-dso-programme-work-and-long-term-development-statement</u>

⁵ <u>https://www.ofgem.gov.uk/publications/next-steps-our-reforms-long-term-</u> <u>development-statement-ltds-and-key-enablers-dso-programme-work</u>

⁶ <u>https://www.ofgem.gov.uk/publications/outputs-long-term-development-statement-reforms-working-group</u>

Figure 1: Consultation Stages

Stage 1	Stage 2	Stage 3
Informal Consultation Period	Formal Consultation Period in accordance with the requirements of paragraph	Ofgem Direction mandating the use of the revised Form of Long Term
(6 weeks)	25.6 of the standard conditions of the	Development Statement
Workshop: 12/09/23 am. Please register your interest by emailing	Electricity Distribution Licence	
ben.watts@ofgem.gov.uk	(28 days)	
29/08/23 - 10/10/23	03/11/23 - 01/12/23	December 2023

How to respond

- 1.23 We want to hear from anyone interested in this informal consultation. Please send your response to the person or team named on this document's front page.
- 1.24 We've asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.
- 1.25 We will publish non-confidential responses on our website at www.ofgem.gov.uk/consultations.

Your response, data and confidentiality

- 1.26 You can ask us to keep your response, or parts of your response, confidential. We'll 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.
- 1.27 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'll get in touch with 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.
- 1.28 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 UK'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.

1.29 If you wish to respond confidentially, we'll keep your response itself confidential, but we will publish the number (but not the names) of confidential responses we receive. We won't 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.

General feedback

We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to these questions:

- 1. Do you have any comments about the overall process of this consultation?
- 2. Do you have any comments about its tone and content?
- 3. Was it easy to read and understand? Or could it have been better written?
- 4. Were its conclusions balanced?
- 5. Did it make reasoned recommendations for improvement?
- 6. Any further comments?

Please send any general feedback comments to stakeholders@ofgem.gov.uk

How to track the progress of the consultation

You can track the progress of a consultation from upcoming to decision status using the 'notify me' function on a consultation page when published on our website. <u>Ofgem.gov.uk/consultations</u>

Notify me +

Would you like to be kept up to date with <i>[Consultation title]</i> ? subscribe to notifications: Email*		
subscribe to notifications:		×
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	Email*	

Once subscribed to the notifications for a particular consultation, you will receive an email to notify you when it has changed status. Our consultation stages are:

Upcoming > **Open** > **Closed** (awaiting decision) > **Closed** (with decision)

Appendices

Index

Appendix	Name of Appendix
1	Privacy Notice on Consultations

Appendix 1 – Privacy Notice on Consultations

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 <u>dpo@ofgem.gov.uk</u>

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

We will not be sharing your personal data.

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 six months after the LTDS Direction is issued.

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".