Making a positive difference
for energy consumers

To: distribution network and system operators, flexibility providers, generators and other interested parties

Date: 30 April 2024

Dear stakeholders,

Re: Response to Formal Consultation on the Form of Long Term Development Statement

The publication of Long Term Development Statements (LTDS), describing the characteristics and development of GB electricity distribution networks, is a long standing obligation on distribution network operators (DNOs), mandated through a direction, pursuant to Standard Licence Condition 25.2 of the standard conditions of the Electricity Distribution Licence and described in detail in the Form of Long Term Development Statement (FoS). 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 make informed decisions.

We recently consulted with stakeholders on a revised draft FoS that introduced important new requirements for grid model data to be provided using the Common Information Model (CIM) and for the publication of Capacity Heatmap data in a common format. These requirements have built upon work undertaken by the LTDS Working Group, and were developed in close engagement with stakeholders.

The following themes arose in response to our formal consultation. In addition to these themes, a small number of minor amendments and corrections to the FoS were suggested.

- Security of data published and hierarchy with Data Best Practice (DBP) guidelines
- Vendor readiness
- GB CIM governance and interoperability
- Implementation plan

- Publishing additional data
- Retirement of previous requirements
- Transmission system visibility
- Capacity heatmap data
- Curtailment information and forecasts/constraints

This letter summarises the feedback that we received, our position on these topics, and where appropriate, what the next steps in progressing the work are.

Security of data published and hierarchy with Data Best Practice guidelines

Stakeholders noted concerns about the security and confidentiality implications of presumed open data publishing. This included both commercial sensitivities, where more granular data could be linked to single site customers or businesses which make up a high proportion of local demand, and national security implications for sites that fall under Critical National Infrastructure (CNI).

The balance between presumed open data and security/confidentiality is being managed across multiple projects, with Ofgem taking an aligned approach, and DBP applying as a foundational element of LTDS outputs. Specifically, special condition 9.5.11 of the special conditions of the Distribution Licence requires licensees, when conducting work that involves working with or making decisions about the use of Energy System Data, to use their best endeavours to act in accordance with DBP Guidance. This means that the DNOs must use best endeavours to follow robust Open Data Triage processes with regards to data security in line with Principles 9 & 11 of the DBP Guidance and Supporting Information. The drafting in Section 8 of the FoS has been amended slightly to clarify the position.

Vendor readiness

DNOs are progressing with preparations to deliver the requirements that we set out at the formal consultation stage, working closely with grid modelling software vendors. All DNOs have submitted implementation plans in accordance with the requirements at Section 9 of the FoS.

We engaged with both DNOs and software vendors to better understand concerns raised about the ability of vendors to meet the requirements set out in the revised FoS. Vendors noted the need to keep requirements stable to allow for timely development. We are pleased by the progress being made by the supply chain and our engagement provides us with confidence that vendors understand the requirements and are able to support DNOs in delivering against the new requirements.

GB CIM governance and interoperability

Establishing a suitable governance body to manage and maintain GB CIM standards as they evolve over time is critical to the successful implementation of LTDS and the long-term maintenance and development of the GB CIM standards.

Discussions are progressing between Ofgem and the BSI regarding the interface between existing UK & international governance structures and any future group providing governance of GB CIM-based data exchange. CIM Governance will need to be integrated into the wider GB digitalisation governance framework, being developed by Ofgem and covering issues of Data Sharing Infrastructure and DBP. We expect to confirm arrangements for the establishment of a GB CIM governance group in Q3 2024.

In Ofgem's previous letter,[1] we made it clear that we want DNOs to lead, coordinate and manage interoperability activities together. We are pleased with the progress that has been made in this area. The DNOs are working together as they plan towards interoperability testing of their LTDS CIM output, with coordination via the CIM Working Group, a subset of the Energy Networks Association's (ENA) Data and Digitalisation Steering Group.

Implementation Plan

Whilst the feedback from the formal consultation was largely positive in respect of the overall staged implementation plan and timescales, some DNOs raised concerns about the risk of failing to meet certain deliverables for reasons beyond their control. Examples include failing to demonstrate interoperability due to a third party or a lack of vendor support. We recognise these concerns and whilst we think the risks are extremely low, we would not want these circumstances to lead to a failure to adhere to the terms of the direction. Ofgem has therefore decided to introduce wording into the direction setting out the steps that a DNO should take if it believes that it is unable to meet a particular implementation deadline.

Publishing additional data

DNOs and vendors raised questions about their ability to publish additional data. To clarify, the DNOs are able to publish data that goes beyond the LTDS requirements set out in the FoS. We would expect the DNOs to work with their stakeholders to understand and meet user needs, and to make sure that any further data included does not cause any issues with interoperability or make combining multiple DNO datasets impractical. Where there is

[1] Re: Form of Long Term Development Statement (ofgem.gov.uk)

missing data, DNOs should use reasonable assumptions and a consistent approach wherever possible.

Ofgem also received feedback that some of the data required under the FoS could be removed as it was considered unnecessary. At this stage we are not minded to remove requirements and would expect DNOs to present clear evidence showing why users would benefit from the removal of data, to justify the removal of requirements in the future.

Retirement of previous requirements

DNOs raised concerns that their stakeholders are unlikely to be ready to transition to using machine readable CIM output and there is a risk that the previous tables could be retired too early. Issues were also raised about the impact that different DNOs retiring at different points would have on national stakeholders that utilise data from multiple DNOs.

Similar to interoperability, we believe that DNOs should work together and with their users, to ensure that the format of LTDS is accessible. DNOs should take stakeholder requirements into account when considering the retirement of existing tables, with dates provided being the earliest possible retirement date. We have modified section 9.3 of the FoS to allow for a gradual retirement of the existing data tables and clarified that this process should be informed by users of the LTDS.

Transmission system visibility

Several DNOs mentioned the need for accurate, up-to-date transmission network models. Whilst this is outside the scope of the LTDS distribution licence requirement, Ofgem acknowledges the need and appreciates the DNOs' concern for data quality. The proposed GC0139 revision to the Grid Code is considering the routine provision of CIM-based transmission grid models to the distribution DNOs which are timely, accurate, and specifically designed to be compatible with distribution grid models.

Capacity heatmap data

Feedback related to capacity heatmap data focused primarily on data content requirements and implementation timing.

Requirements in respect of heatmap data are included in the LTDS FoS for the first time. These requirements relate to the use of a common data structure, rather than the scope or content of capacity heatmaps. In considering feedback from the formal consultation, we have therefore made certain suggested changes relating to data structure, but have decided not to introduce any further specificity in terms of content, as requested by one DNO. The definition of more comprehensive requirements regarding data detail and

network scope may be appropriate in the future once the common structure becomes embedded and depending on user need and experience.

In terms of implementation timing, the date from which capacity heatmap data is to be published in the required structure is now specified as 1st May 2025. This follows the publication of grid model data, so that common object identifiers can be used.

Curtailment information and forecasts/constraints

Several stakeholders commented on the lack of curtailment and other operational data. We agree that this data is important, however, at this stage we do not believe the LTDS is the best tool to provide this data and that this could potentially delay the provision of this data to users, given other changes being made to LTDS. Ofgem is considering the issue of provision of accurate DNO curtailment forecasts and active network management information as part of its end-to-end review of connections incentives, obligations and requirements on the ESO and network companies; a deliverable being progressed under the Connections Action Plan[2].

Ofgem greatly appreciates the work of the LTDS Working Group and the feedback that we have received from all stakeholders throughout the process. We look forward to continuing to work with the DNOs, wider stakeholders and users of the LTDS, as CIM becomes embedded, through these changes to the FoS.

Yours sincerely,

Steve McMahon

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[2] https://www.gov.uk/government/publications/electricity-networks-connections-action-plan