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Ofgem
10 South Colonnade
Canary Wharf
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FAO: Jeff Finch, Energy Sector Digitalisation

Subject: Consultation | Governance of a Data Sharing Infrastructure

Dear Jeff,

CGI welcomes the opportunity to respond Ofgem's Consultation on the Governance of a Data Sharing Infrastructure. Our response is based on our practical experience of designing, delivering and operating public interest digital assets in the utilities sector and other sectors across the globe.

The Consultation is timely given the important role that digitalisation and access to data will play in delivering the 2030 Clean Power Mission. Clarity on the governance and accountabilities for delivery of the Data Sharing Infrastructure will provide confidence and set expectations for energy system stakeholders.

CGI is among the largest IT and business consulting services firms in the world, operating across 21 industry sectors in 400 locations worldwide. We deliver digital services and solutions across the utilities industry, including the electricity, downstream natural gas, and water and waste sectors. CGI is at the forefront of market change and innovation in the utilities sector and is trusted to deliver, operate and secure the systems that enable competitive utility markets around the globe to operate efficiently. These include the data systems at the heart of the GB Smart Metering Implementation Programme for the DCC, the balancing and settlement systems for ELEXON and the systems for MOSL in the competitive non-household water market.

Yours sincerely,

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2 What is a DSI and why is it needed?

1. Do you see potential uses for the DSI within your day-to-day operation in the energy sector?

CGI provides services to primary energy system actors that operative across the energy value chain.

The case for access to data to accelerate the energy transition has been made and is widely accepted, as has the case for addressing the barriers to data access and the need for a mechanism that enables efficient, appropriately secure sharing of data sets. Therefore, establishing a DSI is an important step in enabling access to the data sets necessary to accelerate the energy transition and deliver on Britain's climate commitments.

The conceptual approach outlined in the Digital Spine Feasibility Study and being taken forwards through various related projects (such as the Virtual Energy System and Powering Wales Renewably) delivers a blueprint for development of a functional DSI. Significant further work is required to develop the detailed scope and requirements for the DSI.

2. Do you have any comments on the funding mentioned within this section?

The proposals for funding the development of the DSI MVP and beyond, to 2028, are pragmatic.

We note that the System Operator is expected to submit a proposal for DSI and MVP funding in late 2024 following completion of the Pilot¹. Recent presentations²³ by the System Operator have indicated the Pilot runs into 2025 with the MVP being launched at the end of 2025 and launch of the DSI for regulated networks only in 2028, aligned with the start of ED3. Clarity on milestones and deliverables will be invaluable to support planning by system stakeholders.

3. Do you have any comments on the timeline shown?

The timeline (Figure 2) is broadly sequential. Given the announcement of the 2030 Clean Power Mission, the importance of access to data to inform decision taking and the dependency of other energy sector digitalisation initiatives on the DSI, we expect pressure to accelerate delivery of the DSI to increase.

We note that other energy sector digitalisation initiatives have stated that they have dependencies on the DSI. These include the DSI being used by the Flexibility Market Asset Registration component of the Flexibility Digital Infrastructure to provide a mechanism to securely exchange standardised data between organisations across the energy sector⁴. Access to sources of system and distrusted flexibility is seen as a key lever in delivering the 2030 Clean Power Mission⁵.

¹ [Governance of a Data Sharing Infrastructure \(ofgem.gov.uk\)](#), page 25, 2.44

² Value in Energy Data Series | Virtual energy system: creating the data sharing infrastructure, Energy Systems Catapult, 11 September 2024

³ Ofgem Digitalisation Governance Model for Data Sharing Infrastructure | Member Briefing and Input Session, techUK, 12 September 2024

⁴ [Flexibility Market Asset Registration Consultation \(ofgem.gov.uk\)](#), page 16, 2.26

⁵ Flexibility Forum Meeting 4: The 2030 Mission and Energy Flexibility, Utility Week and CGI, 19 September 2024.

3 Vision for governance of the DSI

4. Do you agree with our short-term governance structure model where the Interim DSI Coordinator is responsible for leading the short-term governance (2024 – 2028) of the DSI?
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Yes.

5. If not, state your reasons and propose an alternative governance model or improvements to our proposed solution.
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Not applicable.

6. Are there any additional governance roles that are not covered by the proposed governance model? If so, what are these?
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We note that the focus of the consultation is on the DSI technical solution. Whilst it may be an implicit function of either the Stakeholder Advisory Group or Ofgem within the proposed governance structure, we believe that there is an explicit role related to the identification, implementation and management of any potential regulatory / licence condition, industry code or legislative modifications that may be required to support the implementation of the DSI and the role of both the Interim DSI Coordinator and the enduring DSI Coordinator.

7. Do you agree with the responsibilities of the interim DSI Coordinator? Are there any additional responsibilities that it should undertake?
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The roles and responsibilities detailed in Figure 5 (P30) imply that the Interim DSI Coordinator will be responsible for procurement of the Prepare, Trust and Share solutions.

Whilst it is sensible for the Interim DSI Coordinator to be responsible for coordinating and agreeing the procurable specifications and requirements for each component within the DSI, the Digital Spine Feasibility Study⁶ and recent System Operator presentations⁷ have indicated that the Data Preparation Nodes sit within the data producer and data consumer organisations. We would therefore expect those organisations [Data Producer and Data Consumer organisations] to be responsible for the procurement of Data Preparation Nodes to meet their organisational needs and policies, but aligned with the specifications produced and controlled through the DSI Governance structure and the Interim DSI Coordinator.

Additionally, we would expect there to be a role and responsibility related to producing and managing testing requirements and ensuring that energy system actors wishing to participate and to provide or to access data via the DSI are able to provide and use the data to the specified standard and that they meet the required policies, such as cyber security requirements.

⁶ [Digital Spine Feasibility Study | Arup, Energy Systems Catapult, University of Bath \(publishing.service.gov.uk\)](#)

⁷ Value in Energy Data Series | Virtual energy system: creating the data sharing infrastructure, Energy Systems Catapult, 11 September 2024

⁸ Ofgem Digitalisation Governance Model for Data Sharing Infrastructure | Member Briefing and Input Session, techUK, 12 September 2024

As per our response to Question 6, there is an additional role related to the identification, implementation and management of any potential regulatory / licence condition, industry code or legislative modifications related to the DSI.

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8. Do the proposed deliverables reflect the outputs that the Interim DSI Coordinator should focus on in the initial DSI stages? Do you suggest any additional deliverables?
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Given that the Interim DSI Coordinator has roles and responsibilities related to Architecture, Technology and Cyber Security, it would seem sensible for there to be associated specific deliverables related to the DSI requirements, specifications and associated management / change control processes.

4 Options for delivery of an Interim DSI Coordinator

9. Do you agree with us that the System Operator is the best option as the Interim DSI Coordinator? If no, explain your reasons and justify your proposed option.
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Yes.

10. What assessment criteria do you foresee being required when transitioning from short-term governance to an enduring governance model?
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Given the importance of the DSI in supporting digitalisation of the energy sector and accelerating the energy transition, the body responsible for the enduring governance of the DSI must be recognised by the breadth of system stakeholders as independent, able to take decisions objectively from a whole system perspective and hold the trust of its stakeholders.

In its consultation on the Market Facilitator Delivery Body⁹, Ofgem set out 7 design principles and 2 wider considerations. We believe these principles can inform the development of appropriate assessment criteria for the development of an enduring governance model for the DSI.

11. What suggestions or feedback do you have for refining these governance assessment criteria to better meet the requirements and challenges of digitalisation in the energy sector?
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The DSI is one of a number of Public Interest Digital Assets (or digital commons) recommended by the Energy Digitalisation Taskforce in its 2021 report. The enduring governance arrangements of the DSI need to be considered in the broader governance landscape for energy system digital commons. We note that a key action in the Energy Digitalisation Taskforce recommendations was to establish a Digital Delivery Body for public interest digital assets^{10,11}. We therefore recommend that the relationship between DSI governance and other initiatives (such as the establishment of a Digital Delivery Body) is identified in order to avoid the risk of duplication or creation of conflicts, and to provide clarity for energy system actors and stakeholders.

⁹ [Market facilitator delivery body \(ofgem.gov.uk\)](https://www.ofgem.gov.uk/market-facilitator-delivery-body), Page 16-17, 2.22-2.32

¹⁰ [ESC-Energy-Digitalisation-Taskforce-Report-2021](#), Page 38

¹¹ [Moving to Action: Digitalising our Net Zero Energy Future](#)