Governance of the Data Sharing Infrastructure Consultation

GreenSync

Email sent to **digitalisation@ofgem.gov.uk**
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Introduction

GreenSync thanks Ofgem for the opportunity to respond to this consultation on 'Governance of the Data Sharing Infrastructure,' as published on 26 July 2024.

In recent years, GreenSync has committed its resources and intellectual property to supporting the transition to Net Zero and remains dedicated to this goal moving forward. We believe that a digital sharing infrastructure is an essential piece for the transition to Net Zero and the very much needed easily accessible, standardised quality data exchange between energy sector participants.

GreenSyc agrees there is a need for robust governance of the DSI to ensure transparency, trust, compliance with regulations, and effective data sharing within the energy sector, and is supportive of the Interim DSI Coordinator being led by the System Operator.

Although this, as identified in the Consultation, might result in 'designing use cases that are suited towards its own operational needs and goals, which may not necessarily be those of the wider energy sector'. Therefore, GreenSync suggests introducing and running a concurrent MVP with for instance asset visibility as a broader energy industry use case. We believe this would not only contribute to the DSI adoption but could also potentially bring the timelines for general introduction forward.

Please reach out to igor.dremelj@greensync.com.au in the first instance should you wish to discuss our response.

With kind regards,

Igor Dremelj

Head of GreenSync Europe

Consultation questions

Q1. Do you see potential uses for the DSI within your day-to-day operation in the energy sector?

Yes, we see DSI as potential solution to share LCT asset data as described in NZIP AAR Programme. We believe attaching the AAR/CAR and/or FMAR (see Ofgem's Flexibility Market Asset Registration Consultation) to DSI would significantly contribute to tackling the asset visibility and flexibility market challenges, in particular with sharing the asset data in a standardised and trusted way.

Q2. Do you have any comments on the funding mentioned within this section?

No comments.

Q3. Do you have any comments on the timeline shown?

GreenSync believes the timelines shown are to be challenged. Promoting for additional use cases in energy sector only towards 2028 is in our view too late and may impact the success of DSI, which, if built, should not be targeted for the regulated networks first but for general availability (full launch).

A concurrent MVP with use case targeted to also other energy participants, such as for example Central Asset Register Preparation node for the DSI, could potentially unlock this and bring the timelines forward.

Q4. 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?

Yes, GreenSync agrees with the short-term governance model as presented.

We agree for the Interim DSI Coordinator to 'undertake significant industry engagement and interaction to determine potential future use cases for the DSI' but we do not believe that the DSI Coordinator should be the body that dictates what use cases are priorities or what and how applications/systems are built which would have the interest of the industry to be connected through the DSI by providing a compliant (and even certified, if needed) data Preparation node.

The DSI Coordinator should solely focus on providing the best performing and lowest cost DSI infrastructure, allowing for simple and seamless yet secure and trusted sharing of data within energy industry.

We do assume to establish and maintain the secure and trusted sharing of data that some sort of certification of Preparation nodes, as well as potentially organisations providing

them, will be required. From the proposal it is not clear who is the responsible body for this and how can the industry engage with the Interim DSI Coordinator and/or Ofgem on implementing Preparation nodes (assuming implementation of the various Preparation nodes is not in the Interim DSI Coordinator's role).

Q5. If not, state your reasons and propose an alternative governance model or improvements to our proposed solution.

GreenSync is of the opinion that the governance model should be solely focused on the design-build-operate-maintain of the sharing and trust framework and that the accreditations and processes around what applications can use DSI should be governed directly by Ofgem.

Q6. Are there any additional governance roles that are not covered by the proposed governance model? If so, what are these?

Certification of Preparation nodes, accreditations of Organisations and processes around what applications can use DSI are not clear from the current governance model.

Q7. Do you agree with the responsibilities of the interim DSI Coordinator? Are there any additional responsibilities that it should undertake?

GreenSync agrees with the key roles and responsibilities of the interim DSI Coordinator as presented in Figure 5 of the Consultation.

Q8. 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?

Yes.

Q9. 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.

Yes, GreenSync agrees that the System Operator is a viable option. We agree as well that nominating the System Operator as the Interim DSI Coordinator may result in 'design use cases that are suited towards its own operational needs and goals, which may not necessarily be those of the wider energy sector', hence GreenSync's proposal to extend the MVP scope to a concurrent MVP using asset visibility (AAR/CAR) as the alternative use case to the current Outage Planning.

Q10. What assessment criteria do you foresee being required when transitioning from short-term governance to an enduring governance model?

Cost, efficiency, scale, neutrality and speed.

Q11. 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?

No further suggestions.