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Citizens Advice response to Ofgem's Consultation on Data Best Practice guidance and Digitalisation Strategy and Action Plan guidance

Dear Greg Johnston,

Thank you for the opportunity to respond.

Citizens Advice welcomes the progress in the development of the Data Best Practice guidance and Digitalisation Strategy and Action Plan guidance. We see the data best practice principles that developed from the Energy Data Taskforce as moving towards a more organised and effective energy data architecture. We agree this process needs embedding in the energy network monopoly licenses. The aims and objectives of the principles and guidelines outlined seem broadly sensible and we are pleased to see the input of stakeholders has been incorporated from the workshop sessions.

These guidance documents can act as building blocks to facilitate the delivery of a smarter energy network and system. This should support the development of services that will be needed for consumer engagement with the connections, devices and flexibility services necessary to achieve Net Zero.

We are concerned, however, that on their own, the broad scope for interpretation around the principles in the guidance may lead to slower development and fragmentation of data access. This will limit innovation and create an unnecessary divergence in energy network data deliverables.

In addition to this guidance, there should be a clear requirement, via ED2 or via another mechanism, for networks to deliver outcomes related to data and digitalisation. We see

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a clear role for networks in providing the data services that will enable better engagement with the increasingly complex home energy service offers. This should be reflected by obligations on the networks.

Consumers and stakeholders would benefit from a clear, coordinated approach to the delivery of an open and usable data architecture that will facilitate stakeholder and ultimately consumer engagement with energy data and services. We are concerned that loose coordination and disparate visions defined by individual network companies might lack enough commonality. We have identified a number of areas where further clarity of requirement and coordination would be beneficial.

As an example, Citizens Advice have tested the ENA data portal which provides a one to many networks request for data access. However, in this model, each stakeholder to network relationship must still be managed separately. This minimal coordination will slow innovation and data retrieval. We have provided feedback to the ENA, but this illustrates how a clearer vision and additional coordination and standardisation will benefit innovators, service providers and ultimately consumers.

Energy networks have sometimes struggled to coordinate their data access to benefit consumers. While gas networks have a checker service for consumers to find their gas supplier, electricity networks don't have a comparable service. Some individual companies such as UKPN offer a comparable product within their region, whereas other networks require consumers to ring a toll-paying number to check their supplier information.

This is highly problematic for consumers. Citizens Advice [webpage](#) that explains to consumers how to check their supplier is one of our most used energy pages but has a poor feedback from users. We think part of the issue is that consumers want their information and data relevant to their decisions at their fingertips. We have evidence consumers place on wanting to control their data in '[Clear and in Control](#)'. Access and control of supplier information is important because a significant number of consumers that contact our helpline services accrue debts when they are unclear of their supplier relationship when moving into a property.

This is an example of networks not being effectively required to identify and address key areas, for which they are responsible, which could lead to better data access that will support present and future consumers.

We think energy networks would also be well placed to ensure priority service register information is passed on to the requisite energy organisations that consumers engage with for their energy services. In our view, this is another area where further clarity of requirement and coordination to deliver these outcomes would be beneficial. We have outlined the requirement in more detail in ['Getting support to those that need it'](#).

We are not clear from this consultation that energy networks would start taking steps that actively support good consumer outcomes or ensure that they will create the foundations for intermediaries to provide the key data services that consumers will need.

Consumers' energy service journey is likely to be more complicated in the future and rely on having access to more data about their energy connection capacity and connection status. Consumers considering investing in the electrification of heating and vehicles will clearly benefit from access to information about what is happening on their LV network as it relates to their service. In terms of current capacity; seeing what high power devices are currently registered at a property; what metering or sub-metering exists, as well as what current flexibility or reinforcement arrangements might be relevant to them as a consumer. To do this in a way that reflects consumers a particular consumers accessibility needs may require more data about consumer circumstances to be shared.

Alongside access to data and information, consumers in numerous studies express a preference for being able to see their energy generation mix with the ability to actively balance or trade energy via P2P networks. Consumers also value useful comparators of energy use and they value understanding the impact of their active engagement in balancing. Networks should have a role in ensuring they do not hold back services consumers want and without which are likely to hold back the energy transition. The government set out in the energy white paper the importance of carbon signals to consumers. Networks need to be central to this deliverable.

There are numerous other data sources alongside network data and network information that will enable consumers to better engage with home energy decisions that will help support Net Zero. For example, energy consumption data, energy efficiency ratings, access to funding support or borrowing options. Energy network data should be easy to combine with these and other data sources

If energy networks are not coordinating their data access offer into a standardised platform in a way that facilitates a range of services that can maximise ease of use to consumers this will be a missed opportunity.

Within the Digitalisation Strategy and Action Plan there is a principle to: 'Ensure Products and Services work towards a defined vision'. We think that some key vision components should be centrally defined and coordinated to ensure that DNO visions are not conflicting, duplicating services or restricting stakeholder or consumer data access with clear progress in enabling price, carbon and generation signals.

We see this as meaning that a principle of 'measurable by default', as proposed in the Engineering Standards Review is appropriate where it relates to efficiently delivering the scope for awareness and insights that consumers and stakeholders will need to make informed decisions about their energy choices required to achieve Net Zero.

Please do get in contact if you want to discuss in more detail.

Kind regards

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