

# ELEXON Business Requirements

Open Data Governance

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# OPEN DATA BUSINESS REQUIREMENTS

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### Document History

Date	Version	Author	Reviewers	Description
20 January 2020	0.1	Assad Ijaz	Shamaila Jawaid	First draft
22/01/2020	0.2	Assad Ijaz		Updated wording and further refined requirements following internal review
03/02/2020	0.3	Assad Ijaz	Chris Wood	Detailed requirements further following review
26/02/2020	0.4	Assad Ijaz	Chris Wood Emma Tribe Jeremy Caplin	Further refinement of requirements following review cycle
14/08/2020	0.5	Assad Ijaz	Chris Wood Jeremy Caplin	Further refinement of requirements following review cycle

### Approvals

Date	Name	Role
	Justin Andrews (Approver)	Head - Design Authority
	Chris Wood (Reviewer)	Senior Change Analyst
	Jeremy Caplin (Reviewer)	Market Architect

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## 1. INTRODUCTION

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### 1.1 Document Purpose

To lay out the Business Requirements to deliver the Proposed Modification [P398 'Increasing access to BSC Data'](#) solution.

## CHANGE SUMMARY

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### 1.2 Introduction

In November 2017 the Secretary of State for Business, Energy and Industrial Strategy (BEIS) presented the UK's Industrial Strategy. The Strategy pledged to 'set Grand Challenges to put the United Kingdom at the forefront of the industries of the future'. The first four [Grand Challenges](#) are intended to focus 'on the global trends which will transform our future'. One of the Grand Challenges is concerned with Artificial Intelligence and Data; this Modification is concerned with the data aspect of that Great Challenge.

BEIS and Ofgem published a joint policy paper in July 2017: '[Upgrading our energy system: smart systems and flexibility plan](#)'. In October 2018, they published a progress update to their policy paper and within this; they established the [Energy Data Task Force](#) (EDTF). The purpose of the EDTF was to 'look across the energy sector, identify gaps where data can be used more efficiently and make clear, actionable, recommendations for Government, Ofgem and industry.' In June 2019, the EDTF published their report '[A Strategy for a Modern Digitalised Energy System](#)' with five recommendations:

1. **Digitalisation of the Energy system** – 'Government and Ofgem should direct the sector to adopt the principle of Digitalisation of the Energy System in the consumers' interest'
2. **Maximising the value of data** – 'Government and Ofgem should direct the sector to adopt the principle that Energy System Data should be Presumed Open'
3. **Visibility of data** – 'A Data Catalogue should be established to provide visibility through standardised metadata of Energy System Datasets across Government, the regulator and industry.'
4. **Co-ordination of Asset registration** – 'An Asset Registration Strategy should be established to coordinate registration of energy assets, simplifying the experience for consumers
5. **Visibility of Infrastructure and Assets** – 'A unified Digital System Map of the Energy System should be established'

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## 1.3 Open Data Problem Statement

Element	Description
The problem of	The BSC not fully adhering to the EDTF recommendations
Affects	BSC and non-BSC Parties interested in energy data
The impact of which	Means stakeholders cannot easily request or access data. This reduces the ability of companies, organisations and consumers to make fully informed decisions.
A successful solution would	Implement a governance process which would allow BSC and non-BSC parties to request BSC data. The request will be assessed against transparent criteria so that data is published in line with open data principles and EDTF recommendations. The solution will allow the opening of markets to further innovation and new ways of operating.

## 1.4 Scope

P398, and by extension these Business Requirements will:

- Modify the BSC to demonstrate commitment to Open Data Principles
- Establish BSCCo processes to assess and progress data requests
- Give consideration to an enduring IT solution to provide data in a variety of formats (not part of the P398 solution).

It should be noted that P398 is solely concerned with data held in relation to Settlement and data held by ELEXON in its role as BSCCo. Due to this, the document will reference BSCCo in subsequent sections.

## 1.5 Impacts

Based on the current scope of the modification, the following processes and systems will be impacted:

- **ELEXON Portal and Website** – for publication of data sets and supporting documentation.
- **BSC Service Desk call allocation matrix** - for queries relating to new process for data requests;
- **Market Operations Teams** – for receiving and assessing data requests in line with new process.

## 1.6 References

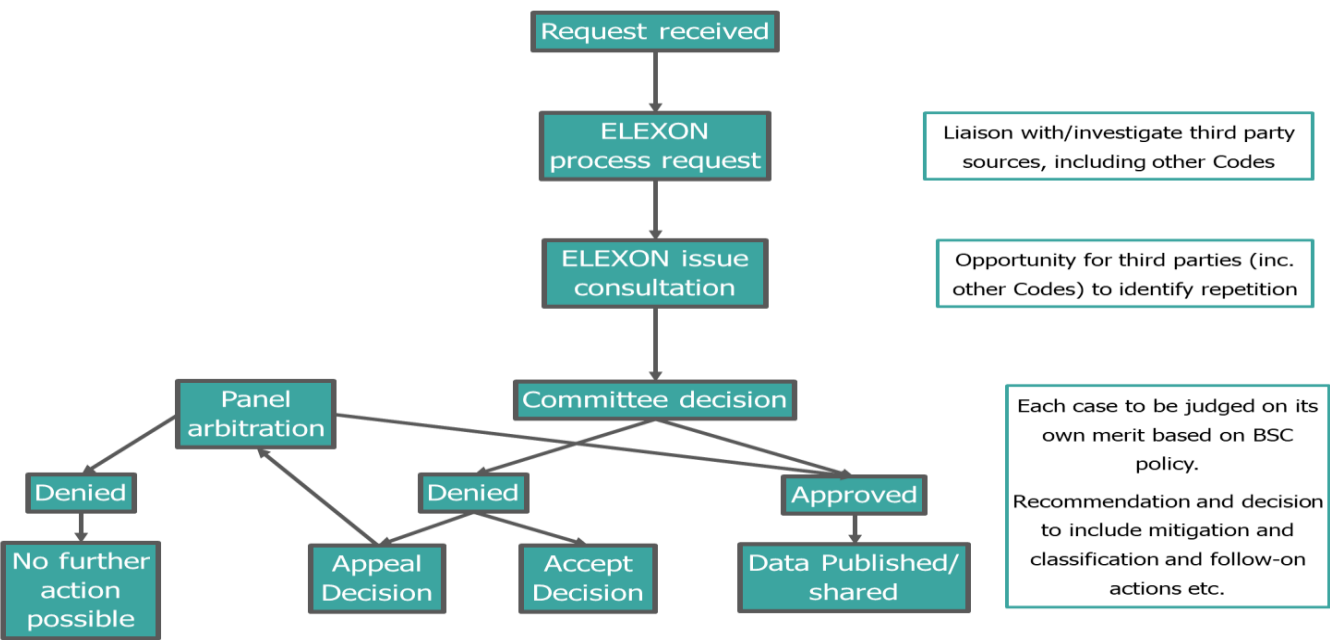
The following documents are related to or affected by this project.

Document	Author	Date
Data Requests LWI v3.0	Market Operations team, ELEXON	15 March 2018
Open data problem statement	Mathilda Rubens, ELEXON	15 July 2019
Open data; Problems and options for solutions	Emma Tribe, ELEXON	23 July 2019

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## 2. HIGH LEVEL PROCESS

The diagram below is the high level the end to end process for P398.



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## 3. BUSINESS REQUIREMENTS

Ref. no	Business Requirement
	<b>Data Requests</b>
<b>BR1</b>	<p><b>Ability for parties to request data</b></p> <p><u>Requirement Description</u></p> <p>BSC and non-BSC Parties must be able request BSC related data from BSCCo, via the submission of a data request form.</p> <p><b>Note:</b> Non-BSC related data (i.e. ELEXON Salaries, meeting minutes, board papers, and board agendas) is considered out of scope for this Modification.</p> <p>To clarify - P398 is concerned with data held in relation to Settlement and data held by ELEXON in its role as the BSCCo as per Section C3 of the Transmission Licence Standard Conditions. P398 is not concerned with data held by ELEXON as a Limited Company outside of its role as BSCCo.</p>
1.1	<p><b>BSCCo to provide data request form</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall create and provide a data request form to enable organisations and individuals to request data. The data request form shall include:</p> <ul style="list-style-type: none"><li>• Requester's name*</li><li>• Requester's Company/organisation (if applicable*)</li><li>• Requester's contact details*</li><li>• A description of what data is being requested*</li><li>• When the data is required by*</li><li>• Reason for request, including (where applicable) the perceived industry benefit for making the data publically available</li><li>• If data being requested is third party data</li></ul> <p>* = Mandatory fields</p>
1.2	<p><b>BSCCo to conduct critical friend analysis</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall conduct 'critical friend' analysis on receipt of a data request form.</p> <p>'Critical friend' analysis shall be in accordance with Principal One of the Code Administrators Code of Practice (<a href="#">CACoP</a>).</p>

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1.3	<b>Data request form to be easily accessible</b>  <u>Requirement Description</u> The data request form shall be stored and available in an easily accessible location
1.4	<b>Instructions for data request form</b>  <u>Requirement Description</u> The data request form shall have clear instructions, detailing the contents of the form and how to complete and submit the form.
1.5	<b>Data request form shall highlight mandatory and optional areas</b>  <u>Requirement Description</u> The data request form shall indicate which sections are mandatory and which are optional.
1.6	<b>BSCCo shall have a single point of contact for receiving requests</b>  <u>Requirement Description</u> BSCCo shall have a primary means of submitting a request (e.g. e-mail address or web submission form) as well as alternate means
1.7	<b>Establish process for acknowledging request</b>  <u>Requirement Description</u> BSCCo shall have a process for acknowledging data requests on receipt.
	<b>Assessment of Request</b>
BR2	<b>Process to Triage Data Requests</b>  <u>Requirement Description</u> BSCCo shall have a process to triage data requests to assess the 'openness' of the data requested, and to determine whether publishing the requested data can cause issues. Data will be triaged according to the following categories: <ul style="list-style-type: none"> <li>• <b>Consumer Privacy</b> - a person who can be identified from the information requested either directly or indirectly in combination with other information;</li> <li>• <b>Negative Consumer Impact</b> - Likely to drive actions that will negatively impact consumers;</li> <li>• <b>Security</b> - creates incremental (or exacerbates existing) security issues which cannot be mitigated via sensible security protocols such as physical security, robust cyber security or buffer databases; or</li> </ul>



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	<ul style="list-style-type: none"> <li>• <b>Commercial</b> - relates to the private administration of a business or, data not collected as part of an obligation by a regulated monopoly and would not have been originated or captured without the activity of the organisation.</li> </ul>
2.1	<p><b>BSCCo to publish document detailing triage process</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall publish a public document detailing the triage process in relation to data requests.</p>
2.2	<p><b>BSCCo to establish processes for updating open data documents</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall establish a process for updating public open data requests documents.</p>
2.3	<p><b>BSCCo to establish Local Working Instructions (LWI) for processing data requests</b></p> <p><u>Requirement Description</u></p> <p>The LWI will be for internal use only and will include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• How data requests are received</li> <li>• How requests are allocated internally – to include naming an individual/team that will take initial responsibility</li> <li>• How to meet the requirements elsewhere within these BRs</li> </ul>
BR3	<p><b>BSCCo to consider mitigation methods</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall consider potential mitigation methods to determine if concerns with a data set (highlighted during triage- BR2) can be alleviated. Mitigation methods to be considered (but not limited to):</p> <ul style="list-style-type: none"> <li>• <b>Redaction</b> - removal of sensitive data</li> <li>• <b>Anonymisation</b> - removal of personal data</li> <li>• <b>Aggregation</b> - combine data sets so the collective sum is less sensitive</li> <li>• <b>Limitation</b> - Only share with specific individuals or group</li> <li>• <b>Noise</b> - Combine original data with meaningless data to confuse</li> <li>• <b>Delay</b> - wait until data is less sensitive before sharing</li> <li>• <b>Differential privacy</b> - Obscuring the data in such a way as to mask identities</li> <li>• <b>Shift/rotate</b> - altering the position or orientation of spatial or time series data</li> <li>• <b>Randomisation</b> - making random changes to data</li> <li>• <b>Normalisation</b> - modifying data to reduce the difference between individual subjects</li> </ul>

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3.1	<p><b>BSCCo to publish document detailing mitigation methods.</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall publish a public document detailing the mitigation methods that are considered and could be applied in relation to requested data.</p>
BR4	<p><b>BSCCo to classify data</b></p> <p><u>Requirement Description</u></p> <p>After triaging and considering potential mitigation techniques, BSCCo shall classify requested data. Categories for data classification are;</p> <ul style="list-style-type: none"> <li>• <b>Open</b> - Available for all to use, modify and distribute with no restrictions;</li> <li>• <b>Public</b> - Publicly available but with some restrictions on usage;</li> <li>• <b>Shared</b> - Available to a limited group of participants possibly with some restrictions on usage; or</li> <li>• <b>Closed</b> - Only available within a single organisation</li> </ul>
4.1	<p><b>BSCCo to publish document detailing data classification.</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall publish a public document detailing how data is classified.</p>
BR5	<p><b>BSCCo to assess time and effort required for data request</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall assess time and effort required to collate, process, and publish the requested data.</p>
5.1	<p><b>BSCCo to request input from BSC Agents</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall establish a process whereby they can request input e.g. impact assessments from BSC Agents, to assist with the overall assessment of a data request.</p>
5.2	<p><b>BSCCo to assess costs</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall assess the cost of processing and publishing data. Standard costs shall be applied when assessing costs</p>
5.3	<p><b>BSCCo to assess effort</b></p> <p><u>Requirement Description</u></p> <p>BSCCo to establish, and publish, standard efforts (Working Days - WD) in relations to processing data requests so far as practicable. Standard efforts could include, but not be limited to:</p>

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	<ul style="list-style-type: none"> <li>• Time to acknowledge request</li> <li>• Time to carry out initial analysis</li> <li>• Time to request BSC Agent input</li> <li>• Time to compile data sets</li> </ul>
5.4	<p><b>BSCCo to consider the benefits of data request</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall consider the potential benefits of publishing a data set.</p>
5.5	<p><b>BSCCo to consider the impacts to wider industry.</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall identify and consider the potential impacts of a data request to wider industry.</p>
BR6	<p><b>BSCCo to make recommendation to BCB.</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall make a recommendation as to whether the requested data set shall be published or not, on the basis of the assessment (as per, BR2, BR3, BR4 and BR5).</p>
	<b>Consultation</b>
BR7	<p><b>BSCCo to consult industry on recommendation</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall consult industry on its recommendations relating to a data request. The consultation period shall be no longer than 15 WD.</p> <p>The consultation shall be conducted on a 'negative response' basis i.e. assume parties are in agreement with recommendation unless they highlight an issue.</p>
7.1	<p><b>Template for consultation</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall develop and maintain a standard template to be used for data request consultations.</p>
7.2	<p><b>Template for responses</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall develop and maintain a standard form for collating consultation responses.</p>

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7.3	<p><b>Instructions for response form</b></p> <p><u>Requirement Description</u></p> <p>The response form shall have clear instructions on how to complete and submit the form.</p>
	<p><b>Decision</b></p>
BR8	<p><b>BSCCo to present recommendation to BCB</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall make recommendations to the Balancing Mechanism Reporting Service (BMRS) change board (BCB) as early as possible, so long as there is at least 5WD between the consultation and BCB paper day.</p>
8.1	<p><b>Template for presenting recommendation</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall develop and maintain (subject to BCB approval) a standard template for presenting recommendations to the BCB in relation to data requests.</p>
BR9	<p><b>BCB to make decision on data request</b></p> <p><u>Requirement Description</u></p> <p>The BCB shall determine whether requested data set shall be published based on inputs received as per, BR6 and BR7. The BCB shall also decide the periodicity of publication.</p>
BR10	<p><b>BSCCo Standing Delegation</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall have the ability to request standing delegation for instances where BSCCo are able to make a decision on data requests without requiring input from the BCB.</p>
10.1	<p><b>Standing Delegation Process</b></p> <p><u>Requirement Description</u></p> <p>There shall be a process by which BSCCo can request standing delegation from the BCB. The process shall also establish a list of scenarios where data requests will qualify for standing delegation.</p>
10.2	<p><b>List of Delegations to be Public</b></p> <p><u>Requirement Description</u></p> <p>The BCB shall publish the list of delegations, along with the rationale, in an easily accessible location</p>

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10.3	<p><b>List of Delegations to be reviewed</b></p> <p><u>Requirement Description</u> The BCB shall periodically review the list of delegations to ensure they remain applicable/appropriate.</p>
BR11	<p><b>BCB to notify requesting party of decision</b></p> <p><u>Requirement Description</u> The BCB shall inform the requesting party of their decision.</p>
BR12	<p><b>Terms of Reference for BCB</b></p> <p><u>Requirement Description</u> The BCB shall have Terms of Reference (ToRs) for its role in determining whether to release data.</p>
12.1	<p><b>BSCCo to Publish BCB TOR</b></p> <p><u>Requirement Description</u> The BCB's ToRs shall be publically in an accessible central location.</p>
	<b>Publication</b>
BR13	<p><b>BSCCo shall publish approved data sets in electronic format</b></p> <p><u>Requirement Description</u> BSCCo shall publish approved data on the ELEXON website 15 WD after the BCB's decision.</p>
13.1	<p><b>Published data sets must be discoverable</b></p> <p><u>Requirement Description</u> All published data sets must be easily discoverable i.e. published and stored in a central location with intuitive navigation links on the ELEXON website.</p>
13.2	<p><b>Published data sets must be descriptive</b></p> <p><u>Requirement Description</u> All published data sets must have appropriate descriptions and provide clear context for users. Descriptions to include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• Explanation of data set</li> <li>• Source of data</li> <li>• Associated metadata</li> <li>• Operations applied to data before publication e.g. cleansing, formatting, transforming.</li> </ul>

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	<ul style="list-style-type: none"> <li>Range of data being published</li> </ul>
13.3	<p><b>BSCCo shall publish all data requests and outcomes</b></p> <p><u>Requirement Description</u></p> <p>The BCB shall publish all data requests received and their outcomes i.e. approved or rejected.</p>
13.4	<p><b>BSCCo shall publish circular and notice</b></p> <p><u>Requirement Description</u></p> <p>The BCB shall publish a circular (or include within existing communications) and put a notice on the ELEXON website to notify parties of decisions on data requests and newly published data sets.</p>
13.5	<p><b>Details of requests can remain anonymous</b></p> <p><u>Requirement Description</u></p> <p>Details of a request may be anonymised if requested and subject to BCB agreement</p>
13.6	<p><b>BSCCO to establish a withdrawal process</b></p> <p><u>Requirement Description</u></p> <p>BSCCO shall establish a process for withdrawing a set of published data. This is for instances where BSCCO become aware of other published data sets in the market that when combined/ utilised with BSCCO data may cause one of the following issues;</p> <ul style="list-style-type: none"> <li>Consumer Privacy</li> <li>Negative Consumer Impact</li> <li>Security</li> <li>Commercial</li> </ul>
	<b>Appeals</b>
BR14	<p><b>Requesting party shall have ability to appeal a decision</b></p> <p><u>Requirement Description</u></p> <p>The requesting party shall have the ability to appeal the decision made by the BCB on a data request. All appeals shall be reviewed by the BSC Panel.</p>
14.1	<p><b>Appeals process</b></p> <p><u>Requirement Description</u></p> <p>There shall be an appeals process, which parties will follow to appeal against a decision made by the BCB on a data request.</p>

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14.2	<p><b>BSCCo to provide appeal form</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall create and provide an appeals form to enable organisations and individuals to document and submit appeals to the Panel.</p>
14.3	<p><b>BSCCo to publish document detailing appeals process</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall publish a public document which details the appeals process.</p>
14.4	<p><b>Panel to review appeal and make decision</b></p> <p><u>Requirement Description</u></p> <p>The BSC Panel shall review all appeals and make a final decision on the data request in question. The BSC Panel shall provide their rationale for arriving at their decision.</p> <p>The BSC Panel shall be guided by the BCB's ToRs in relation to data determinations (see BR12).</p>
14.5	<p><b>Panel to notify appealing party of outcome</b></p> <p><u>Requirement Description</u></p> <p>The Panel shall notify the appealing party of the outcome, including next steps e.g. data to be published.</p>
	<p><b>Reporting</b></p>
BR15	<p><b>BSCCo to submit report to Ofgem</b></p> <p><u>Requirement Description</u></p> <p>BSCCo shall submit a report to Ofgem at least annually. The contents of the report and periodicity shall be as required by Ofgem.</p>