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By email to: digitalisation@ofgem.gov.uk

Dear Charley

RECCo response to: Securing open data in energy – triage in data best practice guidance

We welcome the opportunity to respond to this consultation. Our non-confidential response represents the views of the Retail Energy Code Company Ltd (RECCo) and is based on our role as operator and Code Manager of the Retail Energy Code (REC), which governs key elements of the retail energy market. RECCo is a not-for-profit corporate vehicle responsible for the proper, effective and efficient implementation and ongoing management of the REC arrangements. We seek to promote trust, innovation and competition, whilst maintaining a clear focus on positive consumer outcomes. We are committed to ensuring that RECCo is an "intelligent customer", securing the efficacy and value for money of the services we procure and manage on behalf of REC Parties.

Our response is also informed by RECCo's anticipated role as coordinator of the consumer data domain under the Energy Digitalisation Framework. This reflects our position in the retail energy market, including our responsibility for the Consumer Consent Solution, our role in tariff interoperability and our oversight of the Central Switching Service. It also envisages this responsibility being given effect through our forthcoming Code Manager Licence. As consumer data domain coordinator, RECCo will have an important role in promoting coherent data standards, interoperability and accessible consumer journeys, while maintaining high levels of consumer trust.

RECCo governs a range of retail market and consumer-related data under the REC. Much of that data is access-restricted and, in some cases, personal data, including information used to support switching, energy enquiry services and future consent-based data sharing. Access is already governed through REC data-access, security, privacy and assurance arrangements.

RECCo also publishes a more limited range of non-sensitive Open Data, including information on market performance, REC governance and change activity. We support making appropriate data available where it can be published safely and lawfully, so that market participants, innovators and other stakeholders can develop products, services and insights that benefit consumers. The nature, uses and rate of change of this data differ from much of the network and infrastructure data that appears to be the principal focus of the consultation. This reinforces the need for the future approach to be proportionate to the relevant data, risks and existing governance arrangements.

We have set out our response to each of the consultation questions in the appendix to this letter, but would like to highlight the following points:

- **We support stronger and more consistent Data Best Practice, but not a single uniform model for all organisations and data.** RECCo supports the principles of presumed open, improved data discovery, security and interoperability, and agrees that proportionate DBP requirements should apply to licensed Code Managers. However, the risk profile of network and Critical National Infrastructure data differs materially from much of the varied, code-specific data governed by Code Managers. Ofgem should therefore adopt a proportionate and risk-based approach that recognises existing Industry Code governance, data-access and assurance arrangements.

- **An enhanced Educational Model should be implemented now on a no-regrets basis.** Updated guidance, common documentation, training, coordinated assurance, improved metadata discovery

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and shared threat intelligence could provide meaningful near-term mitigation while retaining clear accountability with the organisations that understand and govern the relevant data. These measures are not mutually exclusive with later Hybrid or Centralised arrangements and would generate evidence on whether additional central validation is necessary. Consistent with better-regulation principles, more interventionist measures should be targeted only where the evidence demonstrates that they are needed.

- **Ofgem should not commit to DCF-dependent central validation and publication until the model is properly defined and evidenced.** The consultation does not yet provide a sufficiently developed cost-benefit analysis or resolve important questions about scope, legal accountability, data protection, security and concentration risk - including whether a sector-specific DCF would be equipped to assess aggregation risks arising from combinations of energy and non-energy data - residual costs and the treatment of existing publications. The DCF's mandate, capability and resources also remain undecided, with its establishment and mobilisation expected to take two to three years. The proposals should also be considered alongside the government's developing plans for an energy Smart Data scheme, so that the triage model does not pre-empt or create arrangements that are inconsistent with the wider policy framework for energy data sharing. Any later central validation should therefore follow a fuller assessment and be targeted at categories of higher-risk data rather than applied automatically to all Code Managers and datasets.

We are happy to discuss any of the points raised in this response.

Yours sincerely,

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Appendix: RECCo response to consultation questions

Q1: Please provide examples of where data made available under DBP Guidance has allowed your business model to develop either new products and services, or make efficiency savings?

RECCo does not operate a commercial business model that is directly dependent on data published under the Data Best Practice Guidance, and we are therefore not able to identify or quantify a specific new RECCo product, service or efficiency saving that is directly attributable to the Guidance.

We nevertheless strongly support the principle of open data where information can be published safely and lawfully. We support making appropriate use of the data for which RECCo is a custodian so that market participants, innovators and other stakeholders can develop products, services and insights that support competition, improve market outcomes and deliver benefits for consumers.

From RECCo's perspective, the benefits of accessible, discoverable and interoperable energy system data may include:

- reducing information asymmetry and enabling new entrants and innovators to understand the market more readily;
- reducing the need for repeated or bespoke information requests;
- supporting more informed network, local energy and low-carbon technology planning;
- enabling the development and better targeting of flexibility and other consumer-facing services;
- improving the quality and efficiency of investment decisions; and
- supporting innovation that may ultimately reduce costs, improve service quality and strengthen consumer outcomes.

The consultation identifies examples including the use of aggregated smart meter data for local energy and network investment planning, as well as open data supporting power-cut alerts, outage mapping, research and flexibility markets. These illustrate how data held by regulated bodies can create value beyond the organisation that originally collected or managed it.

We therefore consider that Ofgem's assessment should take account not only of new commercial products created directly from open data, but also of wider and less readily quantified benefits, including improved market transparency, lower barriers to participation, reduced duplication, better-informed decision-making and improved outcomes for consumers.

We would, however, encourage Ofgem to distinguish clearly between benefits arising specifically from the introduction of DBP Guidance and benefits arising from data that was already publicly available under pre-existing regulatory, code or statutory arrangements. The consultation itself notes that several important open-data use cases pre-date DBP Guidance and are not intended to be affected by the current proposals.

RECCo therefore supports the continued principle of presumed open where data can be published safely, lawfully and proportionately. Any strengthening of the triage process should preserve the ability of market participants and other stakeholders to use appropriate data held by RECCo and other custodians to develop innovative products and services in the interests of consumers.

Q2: Do you agree with the criteria underpinning the Options Analysis?

We agree that ownership and accountability, data security, data quality, cost and complexity of change are relevant considerations. However, we do not consider that the criteria, as currently formulated and applied, provide a sufficiently complete or evidenced basis for selecting a preferred model.

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The analysis does not adequately assess whether the models would be proportionate to the different types and risk profiles of data concerned, the circumstances of different licensees and future Code Managers, or the controls already provided through licence and Industry Code arrangements. Although the consultation recognises that data varies in sensitivity and utility, the options assessment applies a single security score to each model and does not assess the extent to which each model would preserve the accessibility, utility and consumer value of appropriate Open Data.

We also consider that the meaning and relevance of "Data Quality" should be clarified. The consultation appears to include substantive data quality, schema validation, interoperability and data hygiene within a single criterion. Central validation may improve consistency of format, metadata and interoperability, but responsibility for the accuracy and completeness of source data should remain with the relevant Data Custodian and with the licence, Industry Code, change and performance-assurance arrangements governing that data.

Cost and complexity should be assessed on a whole-system and whole-life basis. This should include DCF establishment and operating costs, costs retained by originating Data Custodians, migration and dual-running costs, and any stranded investment in existing Open Data portals. The consultation does not currently provide a transparent quantified comparison of those costs and benefits.

This is particularly significant given the status and expected timetable for establishing the DCF. The Energy Digitalisation Framework states that DESNZ will consult on the form, roles and responsibilities of the DCF by the end of 2026, and that the subsequent process of consultation, regulatory change, appointment and mobilisation is expected to take two to three years, depending on whether an existing organisation is appointed or a new body is created. The DCF is therefore unlikely to be fully operational before 2028 and may not be operational until 2029. Its detailed remit, governance, capability, resourcing and operating costs are consequently not yet known. We do not consider that the full cost, complexity, implementation timetable or resource implications of the Centralised and Hybrid Models can be assessed reliably at this stage.

We also consider that the analysis should examine whether existing regulatory, assurance and enforcement mechanisms could address some or all of the identified concerns before creating new central arrangements.

Finally, the scoring methodology creates a degree of apparent precision that is not supported by the information presented. Only scores of 1 and 5 are defined, the basis for intermediate scores is unclear, no weighting is applied to the criteria, and the three models are separated by only two or three points. It is not self-evident that short-term cost and implementation complexity should carry the same weight as data security, legal accountability or the continuing value of Open Data. We therefore consider that greater emphasis should be placed on the evidenced relative merits and disadvantages of the options rather than on the numerical totals.

We identify additional criteria that should form part of the assessment in our response to Question 3.

Q3: Would you suggest any other criteria that you would consider critical for analysis?

Yes. We consider that the options analysis should include several further criteria.

Proportionality and differentiated risk. The assessment should recognise that the nature and risk profile of the data concerned may differ significantly between organisations. The consultation itself states that the identified risk is greatest for data relating to Critical National Infrastructure and consequently focuses principally on data published by network licensees. Network licensees perform

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directly comparable functions and hold broadly comparable categories of asset, capacity and operational data, which may support a greater degree of standardisation in their triage arrangements.

By contrast, data for which Code Managers are responsible is often specific to the purpose, obligations and processes of the relevant Industry Code. The case for consistent principles and minimum standards across Code Managers does not necessarily mean that identical triage processes or publication decisions will be appropriate for every code and dataset. The options analysis should therefore consider whether differentiated arrangements could achieve the required consistency while remaining proportionate to the risks presented.

Data accessibility, utility and consumer value. The consultation seeks to balance security with the benefits of Open Data, but those benefits are not included as a scored criterion. The assessment should consider whether each model preserves discoverability and access, supports innovation, competition and market transparency, and avoids unnecessary delay or withholding of useful data. It should also consider whether the cost of preparing, validating and publishing particular datasets is proportionate to their likely use and consumer benefit.

Legal and regulatory accountability. The assessment should address not only ownership of the triage process, but also the respective legal responsibilities of the originating Data Custodian, licensee, Code Manager and DCF. This should include responsibility for the lawful transfer, processing and publication of data, liability where data is published or withheld inappropriately, and how disagreements between the DCF and the originating organisation would be resolved.

Ongoing aggregation-risk monitoring and adaptability. We agree with the consultation that aggregation is a risk and its assessment should not be static. A dataset that is safe to publish today may become sensitive when combined with data released subsequently, including data published outside the DBP framework. The assessment should therefore consider whether each model can support a regression-testing-style review, under which every proposed new or materially changed Open Data publication triggers reassessment of the cumulative risk presented by the relevant body of published data. This would allow any change in risk to be identified at the point the incremental data is introduced, so that publication can be reconsidered, mitigated or withheld before the risk crystallises. It would also provide a clearer audit trail showing which new or changed dataset altered the overall risk profile, rather than requiring organisations retrospectively to revisit and disentangle numerous earlier publication decisions.

That reassessment should not be confined to data published within the energy sector or under the DBP framework. The relevant aggregation risk may arise from combining energy data with property, geospatial, transport, telecommunications, public-sector or other Open Data. Although the DCF may have a broader view of energy-sector publications than an individual Data Custodian, it would not necessarily have equivalent visibility of, or expertise in, relevant data published elsewhere.

Ofgem should therefore explain the basis on which it considers the DCF best placed to assess cross-sector aggregation risk. We would also welcome confirmation of whether Ofgem has engaged the Department for Business and Trade and other relevant government, regulatory and security bodies on the potential for a cross-sector approach, common methodology or coordinated risk-assessment process.

Operational resilience and concentration risk. The Centralised and Hybrid Models could create significant dependence on common infrastructure and services. The assessment should consider the

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risk of a single point of operational, cyber or governance failure, the resilience of the central platform and validation tools, and the consequences if the service is unavailable or compromised.

Transparency, challenge and redress. Each model should provide clear, auditable decision-making and effective routes for challenge and review. This should include the ability of an originating Data Custodian to challenge a decision to publish or withhold data, and clarity on who can require reconsideration or withdrawal.

Deliverability and dependencies. The Centralised and Hybrid Models depend on the future DCF, DSI, central publication arrangements, governance and legal mandates. The Energy Digitalisation Framework indicates that the DCF will require consultation, regulatory change, appointment and mobilisation over a two-to-three-year period. The assessment should therefore reflect the uncertainty around timing, capability, resourcing and interim arrangements.

Coherence with emerging Smart Data arrangements. The assessment should have full regard to the government's developing proposals for an energy Smart Data scheme under the Data (Use and Access) Act 2025. Although Smart Data is distinct from Open Data, the frameworks may overlap in areas such as standards, interoperability, security, assurance, governance and central infrastructure.

It will be important that Ofgem's proposed triage arrangements do not pre-empt, duplicate or conflict with the wider Smart Data framework being developed by government. The chosen model should remain adaptable, avoid stranded investment and preserve clear distinctions between Open, Shared, Closed and customer-consented data.

Regulatory necessity. Before creating new central arrangements, Ofgem should assess whether the objectives could be achieved through fuller use of existing regulatory and Industry Code mechanisms. This is particularly relevant to future Code Managers: the Code Manager Licence already provides a framework for cross-code collaboration and could, if necessary, be clarified to require common triage principles, standards, assurance and escalation arrangements, while allowing their application to reflect the distinct data governed by each code.

This may be more proportionate given that network-licensee data is generally more directly relevant to the Critical National Infrastructure threats identified in the consultation, whereas Code Managers typically govern more varied and code-specific datasets. Ofgem should therefore demonstrate the additional benefit of a DCF-led solution over strengthened guidance, collaboration, assurance and enforcement.

Such an assessment would also reflect Ofgem's statutory duty to have regard to the principles that regulatory activities should be transparent, accountable, proportionate, consistent and targeted only at cases where action is needed.

Q4: Do you agree with our Option Assessment scoring and conclusion for the Centralised Model?

No, we do not consider that the scoring or conclusions for the Centralised Model are sufficiently supported by the analysis presented.

Ownership and accountability: The consultation proposes transferring primary responsibility for triage from the originating licensee to the DCF but does not explain how this would interact with the parties' continuing responsibilities under data-protection and other applicable law. This is directly relevant to RECCo because some REC data is personal data.

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Ofgem should clarify:

- each party's controller, joint-controller or processor status;
- the lawful basis for transferring, processing and publishing data;
- the allocation of responsibility and liability; and
- how disagreement between the DCF and the originating Data Custodian would be resolved.

Transferring responsibility under DBP Guidance would not itself transfer or remove statutory accountability.

Industry Codes also already provide governance, change, decision-making and performance-assurance arrangements for code-governed data. The assessment does not explain how the DCF arrangements would interact with these or avoid duplication.

The Centralised and Hybrid Models both receive a score of 3, despite materially different allocations of responsibility. Although this does not necessarily require different scores, Ofgem has not adequately explained how the different risks produce the same result.

Data security: We do not agree that the Centralised Model merits the highest possible security score. The assessment focuses on reducing accidental publication, but does not adequately consider the cyber, operational and concentration risks introduced by central transfer, ingestion, processing and publication.

The scope of the transfer is also unclear. The consultation says that the proposals concern Open Data and do not apply to Shared or Closed Data, but describes the Centralised Model as receiving "all ESD" and untriaged data. On one interpretation, this could include data ultimately classified as Shared or Closed. Ofgem should clarify whether underlying data, metadata or both would be transferred and how particularly sensitive data or metadata would be handled.

The assessment should cover:

- additional transfer and processing vulnerabilities;
- the DCF, DSI and central portal becoming high-value targets;
- concentration and single-point-of-failure risks;
- the consequences of compromise or service failure; and,
- whether bringing Open Data together centrally makes aggregation easier for malicious users.

A central view may help identify aggregation risks, but the consultation does not establish that this benefit outweighs the new risks.

The arrangements should also preserve more nuanced controlled-sharing categories. RECCo uses a Conditionally Shared category to manage risks arising from combined REC datasets. Ofgem should clarify whether such arrangements would continue and whether the DCF would merely classify data or could require aggregation, redaction, reduced granularity or other mitigation. It should also explain who would implement and fund those changes.

Data quality: Central processing may improve schema compliance, metadata, interoperability and formatting. However, it cannot of itself correct the substantive accuracy, completeness or timeliness of source data.

Responsibility for source-data quality should remain with the relevant Data Custodian and the licence, Industry Code, change and performance-assurance arrangements governing that data. The

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consultation therefore overstates the likely quality benefit unless it distinguishes technical validation from the quality of the underlying information.

Cost: We agree that this is likely to be the most expensive model, but do not consider that Ofgem has demonstrated material net savings for licensees or Code Managers.

On our current understanding, RECCo may need to implement and operate a Data Preparation Node specifically, or additionally, to support this process. Originating organisations would continue to incur costs from:

- holding, securing and governing source data;
- preparing and extracting submissions;
- operating the DPN;
- correcting rejected submissions;
- responding to DCF queries;
- reconciling versions; and
- maintaining legal and security assurance.

Holding the source data alongside centrally processed or published copies may also increase storage, version-control and governance complexity.

Ofgem should clarify whether the central portal would be exclusive and mandatory. Existing portals may be required or supported through Industry Codes; closing them could strand previous investment and create migration, decommissioning and dual-running costs. The consultation does not quantify these residual costs or compare them transparently with the anticipated savings.

Complexity: We agree that the Centralised Model would be the most complex to implement, but the assessment should also address continuing operational complexity.

In particular, Ofgem should clarify whether every new or materially changed ESD dataset must be submitted for central triage, irrespective of the originating organisation's preliminary view of its suitability for publication. References to "all ESD" and "untriaged" data suggest this may be intended, although that is difficult to reconcile with the stated focus on Open Data.

If every new or changed data item must pass through the DCF, the volume of submissions could be substantial, particularly for Industry Code data that changes frequently. This could create bottlenecks, delay publication and urgent corrections, slow code-change implementation, increase the cost of developing new data products and disincentivise the creation or improvement of datasets.

Ofgem should therefore assess expected volumes, processing times, service standards, prioritisation, escalation and review arrangements, and the DCF's capacity to manage frequent changes.

These uncertainties are heightened by the status of the DCF. Its form, remit and responsibilities remain subject to consultation, while consultation, regulatory change, appointment and mobilisation are expected to take two to three years. It is therefore unlikely to be fully operational before 2028 and may not be operational until 2029.

Receiving untriaged data and determining whether it should be openly published also appears materially broader than the DCF's currently described functions relating to architecture, standards, interoperability and coordination.

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Overall conclusion: The Centralised Model could offer greater consistency and a system-wide view of aggregation risk. However, the consultation does not demonstrate that these benefits outweigh the unresolved legal, security, concentration, cost and operational risks.

Before the model could be supported, Ofgem would need to provide a clear legal and governance framework, a detailed operating design, clarity on the data transferred and available mitigations, a quantified whole-system cost-benefit assessment, and a fuller evaluation of resilience and ongoing operational risks.

Q5: Do you agree with our Option Assessment scoring and conclusion for the Hybrid Model?

While the Hybrid Model appears more proportionate than the Centralised Model and may provide a suitable basis for further development, we do not consider that the scoring or conclusions are sufficiently supported by the information provided.

Ownership/accountability: As with the Centralised Model, legal accountabilities between the DCF and the originating Data Custodian are unclear. The risk is reduced under the Hybrid Model because the licensee retains primary responsibility for triage and data assessed as too sensitive for open publication remains within its systems, although metadata may still be transferred unless itself sensitive.

Ofgem should clarify responsibility where the DCF rejects data the licensee considers suitable for publication, fails to identify a sensitivity, produces a false positive or negative through automated validation, or requires changes with which the licensee disagrees. The Centralised and Hybrid Models have materially different accountability structures, yet both score 3. Equal scores may be possible for different reasons, but the consultation does not explain this adequately.

Data security: The assessment should consider the security and resilience of the DCF's systems and processes. Although only data assessed by the licensee as suitable for open publication would normally be transferred, the DCF may subsequently identify sensitivities. Transfer and central processing therefore still introduce additional vulnerabilities.

The assessment should cover transfer through the DPN and DSI, the validation tool and central platform, sensitive metadata, concentration and single-point-of-failure risks, service compromise or unavailability, and false negatives from automated validation. A central view may help identify aggregation risks unavailable to individual licensees, but the consultation does not demonstrate the overall net security benefit or justify the proposed score.

Data quality: As set out in our responses to Questions 2–4, we consider that this criterion would benefit from further clarity and definition. Central validation may improve schema compliance, metadata, formatting and interoperability, but cannot correct the accuracy, completeness or timeliness of source data. Those matters should remain with the Data Custodian and the relevant licence or Industry Code framework.

The narrower scope of data transferred under the Hybrid Model does not necessarily require a different score from the Centralised Model, because both may apply similar technical validation to data intended for publication. However, Ofgem should distinguish technical validation from source-data quality.

Cost: The assessment does not adequately recognise existing investment in Code Manager Open Data portals or the residual costs falling on licensees and Code Managers. The Hybrid Model would require Code Managers to implement and operate a DPN while continuing to hold, secure and govern their source data.

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It also introduces a two-stage triage and validation process. Even if the DCF check is largely automated rather than a full second triage, licensees would still need to prepare and submit data, respond to failures and queries, reconcile versions and maintain legal and security assurance. The consultation has therefore not demonstrated that the model would reduce the overall resourcing burden.

It is also unclear what happens where data is rejected. Ofgem should clarify whether aggregation, redaction, reduced granularity or other mitigation could be used instead, who would determine and implement it, and where the costs would fall.

The consultation suggests that Shared Data would most likely be routed through the DSI. This may not be necessary or proportionate where Industry Codes already provide established repositories, access controls and assurance, including for REC Enquiry Service and CCS data.

Although the Hybrid Model may be the mid-range option overall, no quantified cost analysis is provided. Its score, only one point below the Educational Model, is therefore not adequately evidenced.

Complexity: The Hybrid Model is conceptually less complex than the Centralised Model, but the operation of the proposed digital validation tool is unclear. Ofgem should explain what it validates, how its rules are developed and updated, whether decisions are explainable and auditable, when human review occurs, how errors and challenges are handled, and what service standards and turnaround times would apply.

Updated guidance would also be required, but it is unclear whether existing network-focused materials, such as the ENA Playbook, would need significant adaptation for Code Managers and code-governed data.

The model has fewer dependencies than the Centralised Model and may support staged development, but ongoing complexity also matters. Data triaged by a licensee as suitable for publication would still require central validation, which could create bottlenecks for frequently changing or urgently corrected Industry Code data.

A slow, costly or unpredictable process could delay publication and code-change implementation, and may unintentionally discourage Data Custodians from classifying data as Open where doing so would create additional administrative burden. This would risk weakening the principle of presumed open.

The assessment should also cover version control, changes to schemas and metadata, reassessment of earlier publications where aggregation risk changes, and the DCF's capacity to manage frequent submissions. The complexity score, only one point below the Educational Model, is therefore not adequately supported.

Overall conclusion: The Hybrid Model may offer a more proportionate balance by retaining the originating organisation's primary responsibility while providing a central validation capability. However, its merits depend on whether the DCF performs a limited automated compliance check or a substantive assessment of content and aggregation risk. The latter could offer greater value but would require more expertise, governance, cost and operational capability than the consultation currently recognises.

We therefore do not support the current scoring or conclusion without further clarification and evidence, although a more clearly defined and proportionately designed Hybrid Model could provide a suitable basis for further development.

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Q6: Do you agree with our Option Assessment scoring and conclusion for the Educational Model?

No, not fully. Whilst we accept that the Educational Model is the lightest-touch approach, we note that the consultation provides less detailed assessment of this model than the Centralised and Hybrid Models and consider that its potential benefits may be understated.

The Educational Model could provide a proportionate, "no-regrets" near-term approach through improved guidance, training, standardisation and assurance. The need for any additional central validation could then be reassessed through a fuller cost-benefit analysis once the DCF's role, capability and costs are clearer. This would not assume that greater centralisation is necessarily required. It would instead allow evidence from the enhanced arrangements to inform that decision. This would be consistent with Ofgem's intention to update the triage guidance regardless of the model selected and with the phased approach to establishing the DCF set out in the Energy Digitalisation Framework.

Ownership/accountability: Under the Educational Model, ownership and accountability for triage would remain clearly with individual licensees. However, greater standardisation and coordination could still deliver more consistent triage across licensees and future Code Managers through common terminology, documentation, training, assurance and escalation arrangements.

The consultation states that the standardised materials would be developed through a working group involving DESNZ, Ofgem, network licensees/the ENA and security personnel. It is important that Code Managers are also involved. Otherwise, there is a risk that the materials will not reflect the nature of Code Manager functions or the way in which data-access arrangements are embedded in Industry Codes. Existing network-focused materials, including the ENA Playbook, may require adaptation for Code Managers and code-governed data.

Consistency between Code Managers could also be supported through the collaboration requirements in the Code Manager Licence, without transferring responsibility for individual publication decisions to a central body.

Data security: We consider that the score may understate the potential of the Educational Model to reduce the risk of accidental publication. Enhanced guidance, standardised documentation, coordinated training, shared threat intelligence and common assurance arrangements could materially improve the consistency and quality of triage decisions.

The Educational Model would also avoid concentrating data, triage and publication within a single high-value target or point of operational failure. This decentralised security benefit does not appear to be reflected adequately in Ofgem's assessment.

We recognise, however, that individual licensees may have limited visibility of data published by other organisations and may therefore be less able to identify cumulative aggregation risks. Ofgem should consider whether the model could be strengthened through:

- a common metadata catalogue supporting data discovery;
- notification of material new publications;
- periodic peer review or audit;
- coordinated sharing of threat intelligence; and
- ongoing reassessment of aggregation risk.

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A common metadata catalogue would be an enhancement to the model as currently described, which envisages no central platform or process. Metadata alone may also be insufficient to assess every aggregation risk, but it could improve visibility while retaining decentralised responsibility.

Data quality: As set out in our responses to Questions 2–5, "Data Quality" should be defined more clearly. The Educational Model would not provide the central schema validation contemplated under the other models, but its score of 1 may understate both existing data-quality controls and the improvements that standardised metadata, documentation and guidance could deliver.

Substantive accuracy, completeness and timeliness should remain the responsibility of the data holder and the relevant Industry Code or licence arrangements. Common guidance may nevertheless improve technical consistency, metadata and interoperability.

Cost and complexity: We agree that the Educational Model, as an enhanced version of the existing licensee triage process, would have the lowest implementation cost and complexity of the three models. It would not, however, be cost-free. Updated guidance would need to be developed and maintained, practitioners trained, security advice kept current, and assurance or audit arrangements established.

It is also important that standardised materials reflect Code Manager functions and existing Industry Code data-access frameworks. Extending DBP obligations to future Code Manager Licensees may itself require licence or code changes, even if the Educational Model requires no major regulatory change for licensees already subject to DBP.

The consultation states that the Educational Model would require review and assurance to confirm that the guidance is being followed. Ofgem should provide more detail on whether this would include periodic audits, peer review or benchmarking, publication of triage records, common escalation arrangements and remedial action where practices diverge.

Overall conclusion: We agree that the Educational Model is the lowest-cost and least-complex option, but do not consider that its potential benefits are fully reflected in the assessment. An enhanced decentralised model combining common standards, Code Manager involvement, coordinated assurance, improved data discovery and continuing risk review could deliver meaningful and timely security improvements while preserving clear accountability with the organisations that understand and govern the relevant data.

It could therefore provide a proportionate starting point while the DCF is established and further evidence is gathered on whether more centralised validation would deliver sufficient additional benefit to justify its cost and complexity.

Q7: Do you agree with our minded to position? If not, what is your view as to the best approach to this issue?

Based on the evidence and rationale provided, we do not agree with the minded to position. RECCo supports the principles underpinning Data Best Practice and agrees in principle that proportionate DBP requirements should apply to licensed Code Managers. We strongly support improved data discovery, security and interoperability, together with the principle of presumed open where data can be published safely and lawfully.

However, we do not support adopting the Hybrid Model now as a single, uniform solution for all licensees, future Code Managers and categories of Energy System Data.

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The consultation does not provide a sufficiently developed cost-benefit analysis or adequately assess proportionality, differentiated risk and data value. Central validation may reduce some risks of inappropriate disclosure, particularly aggregation risk, but it cannot eliminate risks arising from combining energy data with information published elsewhere. Nor is it clear that a sector-specific DCF would necessarily be better placed than originating Data Custodians to identify risks arising from combinations with non-energy data. Ofgem should clarify how such cross-sector risks would be assessed and whether it has considered a coordinated approach with DBT and other relevant bodies. However, whatever the scope of the additional checks there is a risk that it could lead to the unnecessary withholding or delayed publication of useful data, undermining the benefits DBP is intended to secure.

There is also considerable uncertainty about the DCF itself. Its form, mandate, capability and resourcing remain subject to consultation, while the Energy Digitalisation Framework anticipates a two-to-three-year process of consultation, regulatory change, appointment and mobilisation. The proposed role in receiving, validating and publishing data also appears materially broader than the DCF's currently described responsibilities for architecture, standards, interoperability and coordination.

The assessment should give greater weight to the controls already provided through Industry Codes. In the REC context these include clear RECCo accountability for data it controls and publishes; PAB oversight; established data-access, security, privacy and controlled-sharing arrangements; the Energy Market Data Specification; risk-based performance assurance; formal REC change governance; and RECCo's future accountability under the Code Manager Licence. These arrangements do not remove the need for improvement, but they should be recognised when assessing the additional benefit and proportionality of central validation.

Ofgem should also explain how mandatory central publication would align with the federated approach in the Energy Digitalisation Framework, under which data may remain held through decentralised systems while common standards, discovery and access arrangements are coordinated. Central standards and validation do not necessarily require all Open Data to be hosted on one platform.

Further clarification is required on scope. The proposed definition of Energy System Data is very broad and could potentially capture Industry Code documents, Modification Proposals, consultation materials and data held or mastered by Code Parties rather than Code Managers. Ofgem should explain which categories of code-governed information are intended to fall within scope, how obligations would apply where the Code Manager does not hold the source data, and the regulatory route through which the arrangements would become binding.

The statement that Ofgem does not propose to change "long-established use cases" also requires explanation. It is unclear whether existing publications would be exempt from initial re-triage, remain subject to review where aggregation risks change, be migrated to the central platform or continue through existing publication arrangements. Exempting them entirely may leave identified risks unaddressed, while immediate re-triage of all existing publications could create a disproportionate burden.

The respective responsibilities of the DCF and originating Data Custodian also need to be defined. This should cover who determines and funds mitigations such as aggregation, redaction or reduced granularity; who decides publication format and frequency; who responds to users; how platform improvements are governed; and how disagreements are resolved. Responsibility for DBP triage must also be distinguished from continuing legal accountability under data-protection and other applicable law.

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Recommended approach

RECCo considers that an enhanced Educational Model should be adopted immediately on a no-regrets basis. Updated guidance, standardised documentation, training, common assurance, improved metadata discovery and coordinated sharing of threat intelligence could provide meaningful near-term mitigation while preserving clear accountability with the organisations that understand and govern the relevant data.

These measures are not mutually exclusive with later Hybrid or Centralised arrangements. They would generate evidence on the effectiveness of improved decentralised triage and provide foundations that could be reused in any future model.

Ofgem should establish clear success measures, monitoring and a scheduled review. Once the DCF's remit, capability and costs are known, it could then undertake a fuller cost-benefit assessment of whether additional central validation is necessary for categories of higher-risk data.

Consistent with better-regulation principles, more interventionist arrangements should be introduced only where evidence demonstrates that improved guidance, assurance and existing regulatory mechanisms are insufficient. Any additional validation should be targeted according to the sensitivity, Critical National Infrastructure relevance, rate of change and existing controls associated with the data concerned. This may justify a Hybrid approach for some higher-risk network or system datasets without requiring the same arrangements for all Code Manager data.