

**Data Sharing Assessment**

	<i>Insert information in boxes below</i>
<b>Dataset name:</b>	Aggregated Smart Meter Data - Secondary Substation
<b>Dataset representation:</b>	CSV
<b>Openness Result:</b>	Shared
<b>Assessment completed by:</b>	R Kavanagh
<b>Date DSA completed:</b>	29/02/2024
<b>Approved for sharing by:</b>	P Lawson
<b>Date of approval:</b>	05/06/2024

<b>Form Completeness</b>	<b>Complete</b>
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	Initial Risk	Mitigation	Residual Risk
Privacy	Red	Simple Data Manipulation	Green
Security	Amber	Restrict Access - Shared Data	Green
Commercial	Green		Green
Negative Consumer Impact	Amber	Simple Data Manipulation	Green
Other	Amber	Simple Data Manipulation	0

<b>Summary</b>	Green	86%
	Amber	0%
	Red	0%

<b>Openness Recommendation</b>	<b>Open</b>
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<b>Recommendation Notes</b>	Limited residual risk remains, consider if areas of risk can be further mitigated through data modification. If this is not possible, consider if this is an acceptable level of risk to proceed with Open publication.
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#	Question	Guidance	Response	Initial Risk	Decision Tool Response	Guidance	Supporting Information and Notes	Mitigation Category	Residual Risk
0	Does NGED own or have a legal right to publish the data?	Has NGED (or a contracted third party) generated or collected the data?  In some cases where data has been shared with NGED by the data owner, there may be rights (via data licencing) or obligations (e.g. Environmental Information Regulations or DCUSA Embedded Capacity Registers) which provide legal grounds for publication of the dataset or derived dataset. Where a dataset combines owned and shared data this should be recorded as shared data.	Yes: Shared Data with legal obligation to publish	Green	Capture evidence of obligation to publish (e.g. Legislation, Regulation, Licence, Code, etc.) and proceed to next check.		Ofgem have mandated DNOs to publish aggregated smart meter consumption data in their Decision on Data Best Practice guidance and Digitalisation Strategy and Action Plan guidance dated 7 August 2023 <a href="https://www.ofgem.gov.uk/publications/decision-updates-data-best-practice-guidance-and-digitalisation-strategy-and-action-plan-guidance">https://www.ofgem.gov.uk/publications/decision-updates-data-best-practice-guidance-and-digitalisation-strategy-and-action-plan-guidance</a>		Green
Privacy									
1	Does the dataset contain personal data?	Consider if sharing this dataset infringes the General Data Protection Regulation (the GDPR) or the Data Protection Act 2018. [1]  Note: Additional guidance is given in LE5 - Data Protection Policy	Yes but mitigation in place	Red	Capture evidence and reason for mitigation in the 'Supporting Information' column and proceed to next check.		Published data only includes aggregated consumption data from five or more customers. Aggregation points are LV feeder and distribution substation.  Aggregation prevents insight into specific customer behaviour or consumption.	Simple Data Manipulation	Green
Security									
2	Does this dataset contain information that creates an incremental security risk or exasperate an existing risk?	Consider if the dataset contains information that is not already public by another source. e.g. existing NGED reports, third party datasets (e.g. satellite imagery), etc. If an alternative source exists then consider if the NGED dataset contains more detailed data (granularity, latency, accuracy, etc.).  Where the dataset contains novel information, it should be assessed for new security issues such as: security of supply (Distribution Code - Engineering Recommendation P2), security of assets, security of people, etc. Where the dataset replicates or extends existing public datasets, consideration should be given to the incremental risk publication would create. For example, does the increased granularity of data create more risk?	Yes but mitigation in place	Amber	Capture evidence and reason for mitigation in the 'Supporting Information' column and proceed to next check.		Aggregated smart meter consumption data will be published a month in arrears to mitigate against security risk to individual customers from publication of real-time consumption data.  Access restricted to registered users only.	Restrict Access - Shared Data	Green
Commercial									
3	Does the dataset contain information that could damage the commercial interests of the company?	Data Best Practice Guidance described commercial information as "Data that relates to the private administration of a business or data which was 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".  Commercial issues could also arise due to prior data licencing which would preclude sharing the same data under different terms (e.g. exclusivity agreement, confidentiality agreement), data which is (or could be interpreted as) inconsistent with regulatory reporting or could be seen as exploiting NGED's licenced role (e.g. could undermine the Competition Act 1998 [3], Enterprise Act 2002 [4] or Enterprise and Regulatory Reform Act 2013 [5])	No	Green	Complete initial and residual risk assessment and proceed to next check				Green
Negative Consumer Impact									
4	Would sharing this dataset result in a negative impact on consumers?	Consider if access to this data is likely to drive actions, intentional or otherwise, which will negatively impact the consumer.  For example, data about procurement assessment processes could drive up prices for products or services which increase costs for consumers.	Yes but mitigation in place	Amber	Capture evidence and reason for mitigation in the 'Supporting Information' column and proceed to next check.		This dataset shows data from smart meters that are able to send back data successfully. It could indicate areas which are badly served by DCC. However, this would return as data simply not shown.  There are several datasets provided by ONS and other government departments that relate to socio-economics.  Overlapping with other datasets allows inference into a population.  However, it appears, on first appearance, high level insights and therefore minimal risk to individuals. Suppliers already have access to smart meter data that could be used for targeting tariffs.  The benefits outweigh the risks.	Simple Data Manipulation	Green
Other									
5	Are there any other concerns associated with sharing this dataset not covered above?	If there are any other issues that require mitigation before publishing your dataset that haven't been addressed by the questions above, please clearly state the reason(s) in the 'Supporting information' cell.  For example, specific legislative or regulatory barriers.	Yes but mitigation in place	Amber	Capture evidence and reason for mitigation in the 'Supporting Information' column and proceed to next check.		In order for NGED to publish Aggregated Smart Meter Consumption Data, an update to the NGED Smart Meter Data Privacy Plan is required.  The NGED Smart Meter Data Privacy Plan has been updated accordingly and has been approved by Ofgem.  The updated NGED Smart Meter Data Privacy Plan is openly available on the main NGED website.  Individual customer Smart Meter Data is aggregated in groups of no less than 5 MPANs per distribution substation or LV feeder. This is deemed by industry, DNOs and the regulator to be sufficient protection of individual customer data.	Simple Data Manipulation	
6	Is a dataset quality caveat required for end users?	Data quality is subjective. A dataset may be perfectly acceptable for one use case but entirely inadequate for another. Data accuracy can be more objective but there remain many instances where the required precision differs across use cases. Data quality should not be seen as a reason for not sharing as potential users may find the quality acceptable for their use, find ways to handle the quality issues or develop ways to solve issues which can improve the quality of the underlying data.  However, known limitations (quality or accuracy) should be clearly documented and where there are uncertainties a robust quality disclaimer should be used.	No	Green	Complete initial and residual risk assessment and proceed to next check				Green