



Risk Assessment Number	SPEN_002b
Dataset	LTDS CIM
No. Data Tables	2
Date	October 2025
Refresh Date	October 2026
Approver	Kirsty Scott

# 1. Principles

SPEN classify their data into three categories, based on the risk assessment outcome:

- *Open*: data is published for all to use, modify, and distribute with no restrictions.
- *Shared*: data is published to a limited group of participants with restrictions on usage.
- *Closed*: due to sensitivities within the data, it is not suitable for publication, however, may be shared with specific stakeholders under a bespoke data sharing agreement where appropriate.

The risk assessment determines the classification and whether it can be published.

The risk assessment considers 6 categories:

1. *Personal privacy*
2. *Security*
3. *Public interest*
4. *Commercial*
5. *Legislation/Regulation preventions*
6. *Other*

Risk scoring is based on a combination of the likelihood of the risk occurring and the impact of it – with an outcome between 0 and 10.

- Risk score of 4 or below: no mitigations applied.
- Risk score of 5-7: mitigations required to be applied before publication.
- Risk score of 8 or above: due to sensitivities within the data, dataset may be categorised as 'Closed' and not suitable for publication.
- If the **total** risk score after mitigation is above an 8 then the dataset is classified as 'Closed' and not suitable for publication.

The mitigations that can be applied are as below:

1. *Aggregation*: combining/summarising in order to reduce granularity whilst still maintaining some value.
2. *Anonymisation*: removal/partial removal of identifying features, e.g. location info, name, address, postcode.
3. *Delay*: deferring release of data for a defined period until a time where the risk is greatly diminished or no longer exists, e.g. outage data could be used to target the network when some sections are placed under greater load, therefore a delay in publication could be implemented to mitigate the risk of the data being used to attack the network.
4. *Pseudonymisation*: replacing identifying features with a different unique identifier, e.g. replacing name and address with an ID that is held internally.
5. *Redaction*: removal or overwriting of features.
6. *Restrict use and access*: e.g. subject to shared data licence conditions, user registration and approval.
7. *Other*: any other mitigating action that could be applied, details of the action are provided in the risk assessment.

<b>Name of Dataset:</b>	LTDS CIM	
<b>Date of Assessment:</b>	24/10/2025	
<b>Dataset Owner:</b>		
<b>Assessment completed</b>		
<b>Dataset Description:</b>	LTDS CIM files.	
<p><i>When assessing below, for all sections, consideration must also be given to other datasets that may be openly available elsewhere (within or out with the organisation) that when combined with this dataset could create sensitivity issues. Do not consider in isolation.</i></p>		
<b>Risk Assessment:</b>  <b>If issues exist, mitigating actions must be listed within the Risk Scoring and Mitigation Table - see overleaf</b>	<p><b>PERSONAL PRIVACY:</b> Is personal data contained in the dataset pre-mitigation?</p> <p>Considerations:</p> <p>'Personal Data' means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly by combining with other information, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Public information can still be personal information, e.g. a satellite image of a house may be personal information that relates to an individual.</p>	YES
	<p><b>SECURITY:</b> Does the dataset, pre-mitigation, include factors that would change the security posture of individuals, entities or impact national security?</p> <p>Considerations:</p> <p>If the dataset contains personal data, would publication of that data go against the rights and freedoms of the individual.</p> <p>If the dataset contains confidential business sensitive information (such as financial information or physical asset information), would publication of that data go against the obligation to implement appropriate technical and organisational measures to protect that information.</p> <p>If the dataset contains details of physical locations or structures, would the publication of that data go against the requirements to protect staff, the public or company infrastructure.</p>	YES
	<p><b>PUBLIC INTEREST:</b> Does the dataset, pre-mitigation, have the potential to negatively impact public interest?</p> <p>Considerations:</p> <p>Could the dataset be reasonably interpreted, intentionally or unintentionally, in a way that would be detrimental to the public good or what is in the best interest of society.</p> <p>Does the data allow for good decision making by its users that allows for an efficient allocation of resources to meet overall stakeholder aims.</p> <p>Could the dataset be used in a way to restrict fair commercial competition.</p> <p>Does the dataset have appropriate transparency and accountability assigned to provide users comfort over the quality of data and its intent.</p>	YES
	<p><b>COMMERCIAL INTEREST:</b> Does the dataset, pre-mitigation, contain information that through its disclosure would, or would be likely to, prejudice or harm the commercial interests of SPEN, those of an individual or customer, a company or another legal entity? Considerations:</p> <p>Are there intellectual property restrictions whereby the data has been obtained by SPEN but with terms and conditions imposed which would restrict onward publishing.</p>	YES
	<p><b>LEGAL / REGULATORY OBLIGATIONS:</b> Does the dataset, pre-mitigation, breach any law or regulations to which SPEN is subject? Considerations:</p> <p>Are there specific legislation or regulation that prohibits publications in whole or in part? These laws include, but are not limited to: Utilities Act 2000; Electricity Act 1989; Gas Act 1986 / 1995; Competition Act 1998; Enterprise Act 2002; Enterprise and Regulatory Reform Act 2013; Data Protection Act 2018; General Data Protection Regulation (GDPR), Network and Information Systems Regulations 2018</p>	NO
	<p><b>OTHER:</b> Other personal privacy, security, public interest, end consumer, legislation/regulation risk, health and safety implication risk? For example risk of health and safety being compromised? Is data quality substantially poor and substantially inadequate at meeting user's needs?</p>	NO

Ref	Sensitivity Area	Risk Details:	Risk Impact before Mitigation	Risk Likelihood before Mitigation	Risk Score	Mitigating Actions	Risk Impact after Mitigation	Risk Likelihood after Mitigation	Risk Score	Action Taken / Comments
1	Personal Privacy	Risk from the model that non-SPEN owned data could be transmitted.	Catastrophic	Certain	10	Redaction	Minor	Unlikely	3	Any generator or other customer owned data is removed from model via scripting.
2	Security	Could become problematic for critical national infrastructure as data is in a more accessible format for threat actors. The data could show out of date or incorrect information – i.e. wrongly rated assets or constraints that are operationally managed.	Major	Possible	7	Other	Moderate	Unlikely	4	A well established and comprehensive DAG process is in place to mitigate the risk of data errors. The Long Term Development Statement main document provides a comprehensive narrative on the operation and development of our 132kV (SPM only), 22kV and 11kV distribution network in our SPD and SPM licence areas. This includes a range of information such as network asset technical data, network configuration, geographic plans, fault level information, demand and generation levels, and planned works. Additionally, the LTDS main document provides caveats and encourages developers to contact SPEN for site details and analysis. Same model being used so tables and CIM models should align.
3	Public Interest	Could become problematic for critical national infrastructure as data is in a more accessible format. Developers could use model incorrectly to make judgement on network related connections. Market players could wrongly assume that data can be used for benefit.	Significant	Expected	7	Other	Moderate	Possible	5	The LTDS main document provides caveats and encourages developers to contact SPEN for site specific details and analysis.
4	Commercial	Discrepancies between CIM tables and appendices, as well as misinterpretation of information by stakeholders can lead to customers spending time designing projected in areas of network that may not provide the best solution or lowest cost. This can lead to reduced customer satisfaction, increased workload from design teams and reduced staff morale/health. LTDS Appendices could be used to highlight areas of network with significant network constraints. CIM format is not compatible with normal Open Data Portal format. Typically also requires power systems software which is costly.	Moderate	Expected	6	Other	Moderate	Unlikely	4	The LTDS main document provides a comprehensive narrative on the operation and development of our 132kV (SPM only), 33kV, and 11kV distribution network in our SP Distribution and SP Manweb licence areas. This includes a range of information such as network asset technical data, network configuration, geographic plans, fault level information, demand and generation levels, and planned works. Provided alongside the datasets, this provides context and caveats for any limitations on the data and how it should be used. Standard Licence condition 25.3 requires licensees to identify those parts of the licensee's Distribution System that are likely to reach the limit of their capability during the five-year period covered by the statement, including those parts that may experience thermal overloading, voltage problems, or excess fault levels. Network Constraints are managed within the Rules set by the regulator for each price control. A comprehensive plan is prepared by the business at the start of each price control period and is monitored throughout with internal processes and regulatory reporting requirements. These processes ensure plans are in place to reduce or put right any predicted shortcomings in the operation or capability of the Distribution System. The Long-Term Development Statement (LTDS) Appendix 8 (Predicted Changes) provides customers a list of authorised network interventions. Additionally, the LTDS main document provides narrative and directs readers to further information on our investment planning with a link provided to the Network Development Plan: <a href="https://www.spenergynetworks.co.uk/pages/network_development_plan.aspx">https://www.spenergynetworks.co.uk/pages/network_development_plan.aspx</a> Alignment of LTDS tables and CIM files has been undertaken, however, 100% alignment cannot be guaranteed. User guidance to be provided by SPEN/governing authority related to ingesting and using CIM files
5	Legislation/Regulation Preventions	N/A	N/A	N/A	0	N/A	N/A	N/A	0	Data is required to be released as a licence condition.
6	Other	N/A	N/A	N/A	0	N/A	N/A	N/A	0	

Overall Risk Score (without mitigation)	10.01
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Overall Risk Score (with mitigation)	5.23
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#### LIKELIHOOD RATINGS:

Likelihood	
	<b>N/A</b>
	<b>Remote.</b> Would only happen in exceptional circumstances e.g. there are no historical instances.
	<b>Unlikely.</b> There may have been potential cases/near misses in the past.
	<b>Possible.</b> Known to have happened before on rare occasions or has partially occurred.
	<b>Expected.</b> Has happened before and strong possibility it will likely occur again.
	<b>Certain.</b> Expected to occur frequently.

#### IMPACT RATINGS:

	Impact	E.g. if in P&L and/or cash terms	Examples if in stakeholder terms. Reputation and relationships with employees; customers; shareholders; press, government, and/or regulators
	<b>N/A</b>	N/A	N/A
	<b>Minor.</b> Would have insignificant impact.	< £1m	Short term loss of employee morale, local adverse publicity/media report.
	<b>Moderate.</b> Would have moderate impact which can be effectively managed.	£1m-£10m	Minor employee disengagement, prolonged local adverse publicity/media reporting, localised stakeholder concern, temporary drop in share price, minor reduction in customer base.
	<b>Significant.</b> May require intervention but further impact on any other critical assets/processes unlikely.	£10m-£25m	Isolated employee disengagement, business unit(s), national media interest creating stakeholder concern, negative national stakeholder statements, prolonged decrease in share price, moderate reduction in customer base.
	<b>Major</b> impact on key processes/critical assets affected requiring immediate action to prevent long term damage to the organisation.	£25m-£50m	Employee disengagement across several business units extensive prolonged adverse reactions from media and/or key stakeholders, significant decrease in share price, and a significant reduction in customer base.
	<b>Catastrophic</b> impact upon the business and/or wider industry and/or stakeholder. Reputational damage/ regulatory non-compliance.	>£50m	Companywide employee disengagement, downgrade in credit rating, extensive widespread negative reporting or public disputes with key stakeholders, loss of investor confidence, extensive reduction in customer base, escalation inevitable and impossible to contain.

#### RISK SCORING:

LIKELIHOOD	IMPACT					
	Not Applicable	Minor	Moderate	Significant	Major	Catastrophic
Not Applicable	0	0	0	0	0	0
Remote	0	2	3	4	5	6
Unlikely	0	3	4	5	6	7
Possible	0	4	5	6	7	8
Expected	0	5	6	7	8	9
Certain	0	6	7	8	9	10