



Risk Assessment Number	SPEN_011
Dataset	Operational Forecasting
No. Data Tables	1
Date	October 2024
Refresh Date	October 2025
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.

Name of Dataset:	Operational Forecasting	
Date of Assessment:	30/10/2024	
Dataset Owner:		
Assessment completed		
Dataset Description:	The "Operational Forecasting" dataset provides a forecast view of demand and generation for each Grid and Primary network group for our SP Distribution (SPD) and SP Manweb (SPM) licence areas, for each half-hourly period.	
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.		
Risk Assessment: If issues exist, mitigating actions must be listed within the Risk Scoring and Mitigation Table - see overleaf	PERSONAL PRIVACY: Is personal data contained in the dataset pre-mitigation? Considerations: '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.	YES
	SECURITY: Does the dataset, pre-mitigation, include factors that would change the security posture of individuals, entities or impact national security? Considerations: If the dataset contains personal data, would publication of that data go against the rights and freedoms of the individual. 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. 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.	YES
	PUBLIC INTEREST: Does the dataset, pre-mitigation, have the potential to negatively impact public interest? Considerations: 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. Does the data allow for good decision making by its users that allows for an efficient allocation of resources to meet overall stakeholder aims. Could the dataset be used in a way to restrict fair commercial competition. Does the dataset have appropriate transparency and accountability assigned to provide users comfort over the quality of data and its intent.	YES
	COMMERCIAL INTEREST: 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: Are there intellectual property restrictions whereby the data has been obtained by SPEN but with terms and conditions imposed which would restrict onward publishing.	YES
	LEGAL / REGULATORY OBLIGATIONS: Does the dataset, pre-mitigation, breach any law or regulations to which SPEN is subject? Considerations: 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	NO
	OTHER: 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 users' needs?	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	<p>This data has been triaged to remove information pertaining to individual customers or where the dataset contains sensitive information. This dataset is updated on a daily basis.</p> <p>Even though the dataset itself does not include personal information, there is a potential risk if it is combined with other datasets that do contain personal information. This could inadvertently lead to the identification of individual large customer behaviour</p>	Moderate	Possible	5	Aggregation	Moderate	Unlikely	4	Continue current aggregation process. Ensuring data is not provided at lower voltage level as currently provided.
2	Security		Significant	Remote	4	N/A	Significant	Remote	4	
3	Public Interest	<p>As the dataset is publicly accessible, any inaccuracies or inconsistencies could lead to public scrutiny and criticism.</p> <p>Data may be misinterpreted, leading to misunderstandings about short term electricity profiles. This could result in unwarranted concerns or complaints.</p> <p>Publicly available forecast data could influence market behaviour. Forecasts are based on data driven approach, any inaccurate in these forecasts could lead to stakeholder poorly informed decisions.</p> <p>There may be increased demand for transparency in how the data is collected, processed, and used, which could require additional resources to manage.</p>	Moderate	Possible	5	Other	Minor	Possible	4	Add statement to Open Data Portal dataset information: "Whilst all reasonable care has been taken in the preparation of this data, SP Energy Networks is not responsible for any loss that may be attributed to the use of this information."
4	Commercial	Peak demand data is provided for other publications which are published on the SPEN Open Data Platform (e.g. LTDS, DFES, Network Development Plan). External parties could process this data to determine maximum demand and, compared to other publication, this could cause misinterpretation.	Moderate	Possible	5	Other	Minor	Possible	4	Add statement to Open Data Portal dataset information: "Whilst all reasonable care has been taken in the preparation of this data, SP Energy Networks is not responsible for any loss that may be attributed to the use of this information."
5	Legislation/Regulation Preventions	N/A	N/A	N/A	0	N/A	N/A	N/A	0	Required as part of SPEN's Operational Data Sharing Commitments
6	Other	N/A	N/A	N/A	0	N/A	N/A	N/A	0	

Overall Risk Score (without mitigation)	5.24
---	------

Overall Risk Score (with mitigation)	4.86
--------------------------------------	------

LIKELIHOOD RATINGS:

	Likelihood
	N/A
	Remote. Would only happen in exceptional circumstances e.g. there are no historical instances
	Unlikely. There may have been potential cases/near misses in the past.
	Possible. Known to have happened before on rare occasions or has partially occurred.
	Expected. Has happened before and strong possibility it will likely occur again.
	Certain. 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
	N/A	N/A	N/A
	Minor. Would have insignificant impact.	< £1m	Short term loss of employee morale, local adverse publicity/media report.
	Moderate. 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.
	Significant. 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.
	Major 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.
	Catastrophic 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:

		IMPACT					
		Not Applicable	Minor	Moderate	Significant	Major	Catastrophic
LIKELIHOOD	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