Risk Assessment Number	11
Dataset	Network Scenario Headroom Report
No. Data Tables	5
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:	Network Scenario Headroom Report Data Tables	
Date of Assessment:	30/10/2024	
Dataset Owner:		
Assessment completed by:		
Dataset Description:	Forecasts post-intervention headroom across all network groups out to 2050. This post-intervention headroom is calculated by combining existing network models, scenario forecasts, and known intervention plans.	
When assessing below, for all sections, consideration must also be given to other datasets that may be openly available elsewhere (within or outwith 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 implementation 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?	YES

Classification	Published under an Open Data Licence

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	No dynamic data. Data only provided at primary substation level with no personal information	Minor	Unlikely	3	Redaction	Minor	Remote	2	Data redacted to ensure no single customer site are published.
2	Security	Substation location is published for primary substations (and bulk supply points in SPM), as per the NDP Form of Statement. Asset geographical locations are already published in other datasets via point locations, pdf maps and online heatmaps. Additionally, the assets/substations are visible via satellite imagery and online mapping applications showing aerial imaging and street view.	Significant	Possible	6	Redaction	Moderate	Unlikely	4	Remove substation location from dataset
3	Public Interest	Could unintentionally provide incorrect signals to stakeholders e.g. customers looking for generation or demand connections could misinterpret the available	Moderate	Possible	5	Other	Moderate	Unlikely	4	Annual update of DFES data in line with ESO FES and stakeholder engagment
4	Commercial	The data could be misconstrued, misinterpreted or represented in such a way as to cause reputational damage or harm to SPEN. Stakeholders are likely to use the data to gain an understanding of the future energy landscape. Any misunderstanding or misinterpretation of the dataset in the development of stakeholder plans could lead to a high level of stakeholder inconvenience.	Moderate	Possible	5	Other	Moderate	Unlikely	4	Continued stakeholder engagement and updating of DFES report to ensure that risk is minimised
5	Legislation/Regulation Preventions	N/A	N/A	N/A	0	N/A	N/A	N/A	0	Required under: • SOO 3.1.4 • Operational Data Sharing
6	Other	Data will be updated every year and therefore potentially out of date when accessed.	Minor	Possible	4	N/A	Minor	Possible	4	

Overall Risk Score (without mitigation)	6.23

Overall Risk Score (with mitigation)	4.87

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 occassions, 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	Company wide 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