



Consultation on the Design and Delivery of the Energy Industry Code Reform

Response form

The consultation is available at:

<https://www.gov.uk/government/consultations/energy-code-reform-governance-framework>

The closing date for responses is 28 September 2021.

Please return completed forms to:

BEIS

Team: Code Reform – Electricity Systems Team
Department for Business, Energy and Industrial Strategy
Postal address: Code Reform - Electricity Systems Team
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Abbey 1, 3rd Floor,
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Ofgem

Team: Industry Code and Licensing Team
Office of Gas and Electricity Markets
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Email: codereform@beis.gov.uk and industrycodes@ofgem.gov.uk

BEIS and Ofgem will share with each other all responses that are received.

When responding, please state whether you are responding as an individual or representing the views of an organisation.

Personal / Confidential information

Please be aware that we intend to publish [a summary of] all responses to this consultation.

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If you want information, including personal data, that you provide to be treated as confidential, please explain to us below why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we shall take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the department.

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Comments: [Click here to enter text.](#)

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	Respondent type
<input type="checkbox"/>	Business representative organisation/trade body
<input type="checkbox"/>	Central government
<input type="checkbox"/>	Charity or social enterprise
<input type="checkbox"/>	Individual
<input checked="" type="checkbox"/>	Large business (over 250 staff)
<input type="checkbox"/>	Legal representative
<input type="checkbox"/>	Local government
<input type="checkbox"/>	Medium business (50 to 250 staff)
<input type="checkbox"/>	Micro business (up to 9 staff)
<input type="checkbox"/>	Small business (10 to 49 staff)
<input type="checkbox"/>	Trade union or staff association
<input type="checkbox"/>	Other (please describe)

Questions

Question 1

This question refers to chapter 2 – Scope of reform.

To what extent do you agree with our proposals on the licensing of a code manager for engineering standards, and why?

- ☐ Strongly agree ☒ Agree Neither agree nor disagree ☐ Somewhat disagree
☐ Disagree ☐ Not sure

Comments: Engineering standards, which include provisions within the Grid Code, the Distribution Code and the Security and Quality of Supply Standards (SQSS), and their subsidiary documents, play a key role in the design and operation of the electricity system, and so are integral to achieving net zero ambitions.

The consultation indicates that a joint 2019 government and Ofgem review of electrical engineering standards found that complexities such as a lack of interoperability and standard data formats makes it difficult to enable agile change such as is required to achieve net zero ambitions. The recommendation from that review was for a single party to be made responsible for coordinating and managing changes.

Given the scale of change required to achieve net zero ambitions, we believe there may be merit in engineering standards being the responsibility of a single code body, provided that they have the necessary knowledge and experience to ensure consistency of approach and that change is delivered in a timely manner. Our preferred approach for industry code reform is for open governance arrangements with appropriate stakeholder input throughout, including for engineering standards.

Question 2

This question refers to chapter 2 – Scope of reform.

What are your initial views on how central system delivery bodies should be regulated (including their relationship or integration with code managers and the extent to which licensing may be appropriate), bearing in mind this will be the subject of future consultation?

Comments: If the strategic function (Ofgem) is given powers to direct Central System Delivery Bodies (CSDBs) to deliver changes to systems in order to deliver the strategic direction, we believe that any changes to systems should be required to follow (not pre-empt) associated changes to the code(s). If the strategic function (Ofgem) directed system changes to be made, there should first be a legal basis agreed under the code on which to make those system changes. It would be inappropriate for strategic system changes to be agreed without first determining the necessary industry code changes, informed by appropriate stakeholder input and cost-benefit analysis, especially given there is likely to be consequential impact on the systems of industry participants and associated costs.

Question 3

This question refers to chapter 3.1 – Setting the strategic direction, chapter 3.2.4 - Detailed roles and responsibilities of the strategic body, and chapter 3.2.7 – How would our proposals differ under option 2?

To what extent do you agree with the detailed roles and responsibilities of the **strategic function** as set out above, and why?

☐ Strongly agree ☐ Agree ☐ Neither agree nor disagree ☒ Somewhat disagree ☐ Disagree ☐ Not sure

Comments:

Setting the strategic direction

The consultation references that there is currently no mechanism to align code development with the government's vision for the energy sector and related policy priorities, and that to allow the strategic function to develop a strategic direction in line with the government's vision, government needs to communicate its vision to the strategic function on a regular basis. We fully agree that BEIS should give a strategic policy statement to Ofgem, by which Ofgem can set their strategy.

Proposed roles and responsibilities of the strategic body

It is our understanding that if there was to be a strategic body, it would have oversight of code managers as they develop their delivery plans and have the ability to intervene where plans don't deliver the strategic direction. With this streamlined approach, it is critical that prioritisation by code managers and by the strategic body adequately takes into account input from industry stakeholders and that justified changes required for reasons other than the strategic direction are not deprioritised or rely upon the appeals process.

We also believe there is a role for industry to be consulted and informed regarding the strategic decision-making process including which areas are to be prioritised and for a clear strategic direction to be given to industry in order to clarify expected requirements for future years.

How would our proposals differ under option 2?

We strongly favour option 1 over option 2.

This consultation is being run in parallel with the FSO consultation, for which the FSO is not yet defined. This lack of clarity complicates matters, but we do not believe that Option 2 is appropriate. Option 2 is premised on the strategic function being organisationally part of an expanded code manager function. This creates a significant risk of conflicts of interest arising.

We believe that the FSO should be discounted from undertaking the strategic role as this could be highly contentious and inappropriate given their potential commercial interests. We are also mindful that, for Ofgem's Code Administrator performance surveys that the ESO is typically regarded by stakeholders as one of the poorest performing Code

Administrators *.

* [PowerPoint Presentation \(ofgem.gov.uk\)](https://www.ofgem.gov.uk/powerpoint-presentation)

Question 4

This question refers to chapter 3.2.3 - Detailed roles and responsibilities of the code managers, and chapter 3.2.7 – How would our proposals differ under option 2?

To what extent do you agree with the proposed roles and responsibilities of the **code manager function** as set out above, and why?

☐ Strongly agree ☐ Agree ☒ Neither agree nor disagree ☐ Somewhat disagree ☐ Disagree ☐ Not sure

Comments:

Delivery Plans and prioritisation of code changes

If there was to be a strategic body and code managers, we agree there should be a Strategic Policy Statement and that code managers should be required to develop and publish plans consistent with the strategic body's published strategic direction. However, having code managers accountable to the strategic body for delivery of the strategic direction could create a risk that changes raised in line with the strategic direction may be inappropriately prioritised over more industry-critical or cost-effective changes raised by market participants. We would therefore support a requirement for the Code Manager to consult with industry stakeholders on the prioritisation of code changes in order to help mitigate this risk.

Coordination of cross-code change

There will need to be clear coordination of cross-code governance reforms and modifications in order to help deliver the strategic direction, working across electricity and gas and adjacent sectors such as heat. We note that a similar cross-code approach has been adopted under the Retail Energy Code (REC) and so potentially Ofgem could review this approach in order to establish whether or not this proves to be an effective model.

Code administrators also currently provide an important 'critical friend' service to industry. It is important that code managers maintain this function.

Prioritisation and decision-making

The proposed primary route for changing codes would be through the code manager-led process, replacing code administrators and panels and making decisions on prioritisation and approval of changes. We note also that code managers would be able to actively raise changes. Although, it is expected that industry would still be consulted, the industry codes are complex and varied and often require expert working groups with many years' hands-on experience in niche areas. Unless these working groups and levels of industry engagement continue, there is a risk that sub-optimal decisions and prioritisation could be

made. We also recognise that in order to achieve net zero ambitions, requirements for areas such as heat and Electric Vehicles (EVs) will need to be captured within changes and so it is understood that forums will need to include non-industry representatives. Nevertheless, it is important that sufficient industry representation is maintained of parties who fully understand the systems and process complexities and costs associated with proposals which industry parties will be required to fund.

A balance is needed of strategic direction and achieving objectives across codes so that parties can raise code mods that meet reasonable code objectives other than strategic objectives alone. Code Managers also require a clear remit for decisions in order to avoid risk of missing interdependencies between codes or across gas and electricity sectors. Rather than remove code objectives, we recommend that they are aligned across codes and include an appropriate strategic objective such as how a proposed change could contribute towards net zero targets.

Resourcing of Code Managers

Given the scale and complexity of change needed to achieve net zero ambitions, it is likely that more than one code manager will be required. In that case, we would recommend benchmarking of performance, in a similar way to the current annual Ofgem-led survey of Code Administrator performance based upon stakeholder feedback.

We have encountered issues with the new REC Performance Assurance Code Manager not fully understanding the complexity of the reporting that they are requesting and the burden that this presents to the industry. It is important that any code managers have the required resources, skills and experience and that high levels of industry stakeholder engagement are maintained in order to ensure that impacts of any potential decisions are fully understood.

Question 5

This question refers to chapter 3.1 – Setting the strategic direction, chapter 3.2.5 - Roles and responsibilities of other stakeholders, including code parties, and chapter 3.2.7 – How would our proposals differ under option 2?

To what extent do you agree with the proposed roles and responsibilities of **stakeholders** as set out above, including the role of the stakeholder advisory forum, and why?

☐ Strongly agree ☐ Agree ☐ Neither agree nor disagree ☐ Somewhat disagree ☒ Disagree ☐ Not sure

Comments: As a general principle, we are opposed to reducing the level of involvement of market participants, which the proposals as outlined appear to do.

Given the range and complexity of industry codes, if panels are to be disbanded and Stakeholder advisory forums established, we believe there would be a need for more than one forum per code. It is also important that forums consider cross-code impacts of change which may necessitate joint code meetings. Input is required from experts across codes as changes needed to achieve net zero ambitions will need to consider various

dimensions and interactions.

Although proposals recognise that stakeholders will need to continue to play a key role in supporting code decisions, there is limited detail regarding the forums and their frequency.

In order to achieve net zero ambitions, we recognise that forums may require a range of stakeholders, including non-code parties such as from the EV arena. However, this introduces the risk that not all forum members will necessarily understand the impacts of proposed changes to industry systems and processes which code parties will be required to fund. It is important therefore, that industry representation at these forums is not unduly diluted in order to avoid potentially innovative but impractical proposals (albeit they may meet the strategic direction) being recommended and prioritised by code managers over and above more cost-effective proposals based upon reasoned review of impacts by a range of industry experts.

The frequency of these forums is also important because if held too infrequently, there is a risk that each forum will attempt to review too many changes in a single session, resulting in lack of progress, or decisions made based upon limited analysis and information. Reducing industry input in the code change process, such as in the prioritisation of code changes, reduces the ability for expert industry parties to influence the design and progress of changes. Although this may enable more agile prioritisation of changes by code managers in line with the strategic direction, it places a risk of sub-optimal changes going forward to the strategic body and could increase the numbers of appeals raised.

Question 6

This question refers to chapter 3.3 - Appeals process and compliance.

In relation to option 1, where Ofgem would be the strategic body, to what extent do you agree with our proposals on how **decisions by the code manager** would be overseen by the strategic body with, as a minimum, existing appeal routes retained and moved to the strategic body

☐ Strongly agree ☒ Agree ☐ Neither agree nor disagree ☐ Somewhat disagree
☐ Not sure

Comments: Regarding proposals for appeals on decisions by the code manager to be overseen by the strategic body, we agree that, as a minimum, any decisions made by code panels in the existing framework that include an appeal route to Ofgem could, in principle, be appealable to the strategic body where the decisions are made by code managers in the future. This would include existing routes of appeal.

It is important that there is an enduring appeals route on code manager decisions to Ofgem / strategic body.

Question 7

This question refers to chapter 3.3 - Appeals process and compliance.

In relation to option 2, where the FSO would take on the role of the IRMB, to what extent do you agree with our proposals on how relevant **decisions by the code manager function** would be appealable to Ofgem, with a potential prior review route via an internal body?

☐ Strongly agree ☒ Agree ☐ Neither agree nor disagree ☐ Somewhat disagree Disagree ☐ Not sure

Comments: As for option 1, we believe that decisions should be appealable to Ofgem. It would however be reasonable and best practice to have an internal escalation route before going to Ofgem. Although we would welcome clarity as to how this would work as it should not introduce undue delay into the appeals process.

Question 8

This question refers to chapter 3.3 - Appeals process and compliance.

Do you have any views on the two proposed options for appealing **decisions made by Ofgem on material code changes** in option 1 (with Ofgem as the strategic body) and option 2 (with the FSO as the IRMB)?

Comments:

For both options, we believe that code parties should be able to appeal decisions made by Ofgem as the strategic body irrespective of whether the decision is in line with code manager recommendations. Additionally, irrespective of what appeal route is put in place – Judicial review, CMA or both – any decision should be able to be appealed on the merits of the case and not solely because due process had not been followed.

We agree that any appeals framework should allow effective opportunities for views to be represented whilst being as independent as possible, simple and accessible, without introducing undue delay or uncertainty to the code change process, but the timescales should have sufficient flexibility to cater for different levels of complexity or materiality in the subject matter.

We do not agree that all strategic body decisions on code changes should be subject only to judicial review, including where the decision of the strategic body aligns with the recommendations of the code manager. Although this may be simple to implement, it could weaken existing licensee protections. In a competitive market, we believe it is unjustified to not retain the current appeal routes to both the CMA or through Judicial Review.

Relying solely on the judicial review route, which is typically more costly, would introduce a

significant barrier particularly to smaller participants.

Question 9

This question refers to chapter 3.3 - Appeals process and compliance.

Do you have any thoughts on other potential appeal routes?

Comments: No additional comments at this time.

Question 10

This question refers to chapter 4.1 - Proposed operating model and accountability (for option 1).

To what extent do you agree with the proposed operating model and accountability structure for Ofgem as the strategic body, and why?

☐ Strongly agree ☒ Agree ☐ Neither agree nor disagree ☐ Somewhat disagree ☐ Disagree ☐ Not sure

Comments: If there is to be a strategic body then as long as they are adequately resourced, we are broadly supportive of the proposed operating model and accountability structure for Ofgem as the strategic body. If Ofgem does not fulfil this role then we question who would be better able and equally impartial to fulfil it. Indeed, if a party other than Ofgem is required to conduct this role then there is considerable risk of overlap of vires and duplication of resource and so utilising Ofgem's current resources would appear to be the most efficient option.

Question 11

This question refers to chapter 4.2 - Monitoring and evaluation (for option 1).

To what extent do you agree with the monitoring and evaluation approach for Ofgem's performance as strategic body, and why?

☐ Strongly agree ☒ Agree ☐ Neither agree nor disagree ☐ Somewhat disagree ☐ Disagree ☐ Not sure

Comments: We broadly agree with the monitoring and evaluation approach.

There is a risk that the strategic body lacks accountability and relies more heavily on the increased role of the code managers to embed change without appropriate consideration of costs and benefits to market participants and the consumer. We are therefore supportive of proposals for seeking stakeholder views on Ofgem's performance.

To help ensure effectiveness, it is important that Ofgem has sufficient resource and that

representatives are constructively attending and participating in workgroups. We note that Ofgem's level of engagement in industry workgroups (both frequency and capability) has declined in recent years.

Question 12

This question refers to chapter 5.2 - Establishing code managers.

To what extent do you agree with the ways we propose that the strategic body select code managers, and why?

☐ Strongly agree ☒ Agree ☐ Neither agree nor disagree ☐ Somewhat disagree ☐ Disagree ☐ Not sure

Comments:

We believe that a tendering process should be used, but we also believe the code manager should be a not-for-profit entity/organisation. In that scenario where price/cost is not the deciding factor, careful consideration needs to be given to assess the organisation's competency, experience and technical expertise. We believe that with respect to a prospective tender, licensees should be prevented from being code managers and should not exercise undue control of the code managers.

Stakeholders fund these decisions and so an open process is required for stakeholder input.

Question 13

This question refers to chapter 5.3 – Budget and funding.

To what extent do you agree with our proposed approach to code manager funding, and why?

☐ Strongly agree ☒ Agree ☐ Neither agree nor disagree ☐ Somewhat disagree ☐ Disagree ☐ Not sure

☐ Not sure

Comments: We agree that code managers should be funded through charges levied on code parties in accordance with a charging methodology set out in the relevant code(s). As such, it is important that industry has the opportunity to comment on budgets.

Consideration should be given to which parties fund code managers if they are not active in all of the market segments covered by that code manager.

There is a risk that code managers may be able to charge for optional or value-added services which could potentially detract from the core services provided. We believe that

the code manager should be a not-for-profit entity/organisation and that the Elexon not-for-profit model, has merits and could present a blueprint.

Question 14

This question refers to chapter 5.3 - Budget and funding.

To what extent do you agree with our proposal that the strategic body should be accountable for code manager budgets, and why?

☐ Strongly agree ☐ Agree ☐ Neither agree nor disagree ☒ Somewhat disagree ☐ Disagree ☐ Not sure

Comments: Although a future consultation will consider the detailed requirements for setting code manager budgets, this approach appears to lack accountability to the code parties that will be funding the contract managers. We agree that stakeholders should be consulted on budgets to promote a degree of accountability to industry parties.

Question 15

This question refers to chapter 6.1 - Proposed operating model and accountability (for option 2).

To what extent do you agree with the proposed operating model and accountability structure for option 2, where the FSO takes on the role of the IRMB, and why?

☐ Strongly agree ☐ Agree ☐ Neither agree nor disagree ☐ Somewhat disagree ☒ Disagree ☐ Not sure

Comments: We do not support the FSO undertaking the role of IRMB as having code management responsibilities would detract from its core activities and create a risk of conflict of interest and potential lack of transparency.

A single body having oversight across multiple sectors could restrict the ability for stakeholders to challenge and to consult on proposals and so limit the scope for other options to be considered.

We believe that the ESO's role as code administrator for the CUSC and Grid Code should be transferred to another code party or not-for-profit independent body.

Question 16

This question refers to chapter 7.1 - Options analysis

Overall, which of the two options do you think would be best placed to reform code governance, and why?

☒ Option 1, where Ofgem is designated as the strategic body with the power to licence separate code managers

☐ Option 2, where the FSO takes on the role of an IRMB, which combines the strategic and code manager functions

☐ Not sure

Comments: We favour option 1, but with more channels for industry to maintain their current level of engagement in order to ensure that the right decisions are made. Option 1 offers the best combination of independent strategic direction and independent specialist code management without any risk to blurring of objectives or creating conflicts of interest.

We do not support option 2, where the FSO takes on the role of an IRMB because having code management responsibilities would detract from its core activities and risk conflict of interest and potential lack of transparency.

The following three questions relate to the impact assessment on the code reform that is published along with this consultation. Please only answer the questions below if you have read the Impact Assessment.

Question 17

To what extent do you agree with our estimated costs for the new code manager function set out in the impact assessment, and why?

☐ Strongly agree ☐ Agree ☐ Neither agree nor disagree ☒ Somewhat disagree ☐ Disagree ☐ Not sure

Comments: We believe that the consultation misses the opportunity to explore other options under current governance arrangements, which could be implemented at relatively low cost and disruption to industry, including potential quick wins such as alignment of code objectives across codes, inclusion of a net zero objective and potential amalgamation of some codes.

Given the large number of uncertainties, and areas for future consultation, until there is greater clarity, in particular on the role of stakeholders, it is difficult to assess whether the estimated costs are realistic.

Option 1

Within the impact assessment it states that, for option 1, Ofgem are expected to face increased costs of around £2m per year due to increased resource demands to carry out the strategic body function and that the enhanced code manager functions will pose costs to the appointed organisations estimated as an additional £35m per year from 2024.

It is difficult to quantify the additional costs that Ofgem would face but, we have noticed in the last couple of years that Ofgem has increasingly resourced fewer industry meetings and workgroups. Based upon an assumption that this may be due to resource constraints,

and the additional resource that would be required for option 1 over and above current arrangements, the estimated increased costs of £2m per year may be insufficient. It would be necessary to recruit and train staff with sufficient expertise and experience to effectively manage requirements and to ensure that staff retention rates remain sufficiently high to avoid the need to further recruit and train additional staff as has been an issue in the past.

Regarding the code manager functions, it appears likely that multiple code managers would be required and with sufficient experience and expertise to effectively manage processes including those currently carried out by panels and code administrators including the critical friend function. Similarly to the Ofgem cost estimates, it is extremely difficult to assess these costs given the number of uncertainties, but we would not expect them to be significantly less than the quoted £35m per year from 2024 onward.

The estimated monetised savings to industry as a result of intervention are:

- around £0.3m per year in reduced costs of reading and responding to consultations; and
- around £1.5m per year in reduced costs of workgroup participation due to the increased preparatory work carried out by the enhanced code manager functions.

These estimated savings are very low. It is important therefore, that strong stakeholder engagement is maintained in order to avoid sub-optimal changes, the costs of which could easily displace any potential savings.

Option 2

Within the impact assessment it states that, for option 2 it is estimated that the IRMB function would cost the FSO around £33m per year to carry out from 2026 onwards. This option assumes the same very low estimated monetised savings to industry as for option 1 above. We note that option 2 has a suggested earliest implementation date of 2026 compared with 2024 for option 1. Given the short time available to achieve 2050 net zero targets, we believe this is a further factor to be taken into account in addition to other disadvantages of option 2, as referenced throughout our response.

As for option 1 above, but with even greater levels of uncertainty for our least favoured option 2 given the parallel FSO consultation, it is difficult to assess whether any of these estimates are accurate. We would recommend, for both options, that a further independent review of any estimated costings is carried out.

Question 18

To what extent do you agree that the case studies included in the impact assessment are indicative of the major barriers facing code changes under the current system, and why?

- ☐ Strongly agree ☐ Agree ☐ Neither agree nor disagree ☐ Somewhat disagree ☐ Disagree ☒ Not sure

Comments: We have no comments at this time.

Question 19

To what extent do you agree with the scale and type of benefits to industry estimated in the impact assessment?

☐ Strongly agree ☐ Agree ☐ Neither agree nor disagree ☐ Somewhat disagree ☐ Disagree ☒ Not sure

Comments: We have no comments at this time.

Question 20

This question refers to chapter 8.1 – Context and wider industry developments

Are there any other wider industry developments we should consider in relation to the implementation timeline?

X Yes ☐ No ☐ Not sure

Please provide details of any industry developments you believe should be considered in the implementation timeline and how they could impact on code reform.

REC V2.0 has only just been introduced, including provisions for cross-code working, but it presents a potentially useful benchmark for the benefits that can accrue from code reform and amalgamation. We would recommend taking learnings from the REC, prior to consideration of wider code reform.

Question 21

This question refers to chapter 8 – Implementation approach

Are there any implementation issues, risks or transition considerations we should take into account?

Comments: Given the scope of change, transitional risks include:

- Potential conflicts with delivery of other key industry developments such as market-wide half-hourly settlement (MHHS). We recommend that a review is carried out to identify these key conflicts and interactions and to engage with the bodies leading them in order to help mitigate these risks.
- Risk of Code Administrator expertise being lost in the transition to the proposed new arrangements, including due to any potential code consolidation.
- Ofgem will require additional resource if it is to carry out an increased role. The estimated costs (referenced in the cost benefit analysis) appear to be low. It is important that the necessary skills are identified, recruited and maintained.

Question 22

This question does not refer to any specific chapter.

We invite respondents' views on whether our proposals may have any potential impact on people who share a protected characteristic (age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation), in different ways from people who do not share them. Please provide any evidence that may be useful to assist with our analysis of policy impacts.

Comments: We have no comments at this time.

Question 23

This question does not refer to any specific chapter. Please use this space for any general comments that you may have, comments on the layout of this consultation would also be welcomed.

Do you have any other comments that might aid the consultation process as a whole?

There are still a large number of unknowns, some of which are subject to further consultation.

We agree that the codes arrangements are currently lengthy and complex. This reflects the complexity of the industry and the need for legally enforceable obligations and rules. In the short term, we anticipate an increase in code complexity as new parties with new business models are fully incorporated into codes after a period of sandbox arrangements. We would support rationalisation of codes to ensure complexity is minimised. If code panels are removed, it is critical that stakeholder engagement remains high and that there are practical routes for appeal.

We do agree that there is still fragmentation and a lack of coordination across codes and that the SCR process has not resolved this. We believe that Ofgem has enough regulatory powers (such as SCR powers) and a clear route to utilise them. Where there is industry frustration it is in delay with the SCR process, and sometimes a lack of clarity or direction from Ofgem if / when they are contributing to matters discussed in industry code workgroups.

It is our experience that industry participants rarely aim to stifle change where it is demonstrably in the interests of consumers and/or competition. Indeed, changes currently have to satisfy the relevant objectives of the code. We believe that code objectives should remain because a balance is needed between strategic direction and achieving objectives across codes so that parties can raise code modifications that meet reasonable code objectives other than strategic objectives alone.

We believe that there is merit in standardising and simplifying code governance and addressing common cross code issues such as: quoracy, differing criteria for self-

governance, and rationalising code modification consultation stages. These measures in themselves would make the code change process swifter and more responsive.

Thank you for your views on this consultation.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply ☒

At BEIS we carry out our research on many different topics and consultations, and your views are valuable to us. Would you be happy for us to contact you again from time to time either for research or about other consultations?

☒ Yes

☐ No