# Second consultation on the implementation of the energy code reform– response template

This document provides a template for responses to our second consultation on the implementation of the energy code reform, published on 3rd April 2025.

If you are interested in responding to this consultation, please complete this word document and send it to [industrycodes@ofgem.gov.uk](mailto:industrycodes@ofgem.gov.uk) by the end of the day on Thursday 29 May 2025.

Guidance

We typically publish consultation responses when we publish our decision. To ensure that we can correctly attribute your response, please ensure that you enter all relevant details in the “your company’s details” section (template part 1).

If you would like us to treat your response as being confidential, either in full or in part, please indicate this to us below. Further information on how we will treat your response, data and confidentiality can be found at the end of this document.

Please use template part 2 to provide your responses. For all questions, the template below provides space for you to enter free text comments. Some questions also ask whether you agree with our proposals. Please indicate the extent to which you agree or disagree with relevant proposals by deleting all but one of the bullets provided.

There is also a section for “general feedback” (template part 3). Pease use this section to provide any views on the overall consultation process.

### **Template part 1: Your organisation’s details**

|  |  |
| --- | --- |
| **Contact name** |  |
| **Role title** |  |
| **Company name** |  |
| **Telephone number** |  |
| **Email address** |  |
| **Date of submission** |  |
| **Do you want your response treated as confidential?**  **(If yes, please indicate whether you would like the whole of your response to be confidential, or just particular parts).** |  |

### Template part 2: consultation responses

#### Consultation section 2: Future code modifications process

**Question 1:** Do you agree with our proposal to have in place a premodification process and the proposed roles and responsibilities in this process?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 2:** Do you agree with our proposals on who can raise modification proposals and the associated triage criteria?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 3:** Do you agree with our proposals on when modifications proposals are deemed as withdrawn; i) if a code manager doesn’t take ownership and ii) if the proposer does not engage in the process or acts vexatiously.

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 4:** Do you agree with our proposed roles and responsibilities in determining the materiality and priority of a modification proposal?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 5**: Do you agree with our proposals on cross code working; i) to use the cross code working arrangements in the Retail Energy Code as the basis of future cross code working and; ii) any improvements that could be made to the cross code process.

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 6**: Do you agree with our proposal on how a code manager should decide the need for a workgroup to develop a modification proposal?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 7**: Do you agree with our proposals on alternative modifications; i) who can raise them and ii) a limit on their number.

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 8**: Do you agree the default should be that modification proposals are consulted on once?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 9**: Do you agree with our preferred option (Option 2) to deliver these proposed changes?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 10**: Do you agree with our proposals for the future of the Code Administration Code of Practice?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

#### Consultation section 3: Stakeholder Advisory Forum (SAF)

**Question 11:** Do you agree with our proposed SAF objectives?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 12:** Do you agree with our proposals for SAF membership?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 13:** Do you agree with our proposals on how a SAF will operate?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

#### Consultation section 4: Cross-cutting consequential code changes

**Question 14:** Do you agree with our preferred approach of conducting a case-by-case review of subcommittees in terms of delegated decision making and impartiality?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 15:** Do you agree with our proposals for the running of subcommittees, including that code managers chair and provide the secretariat in all cases?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 16:** Do you agree that the same approach we are taking for subcommittees should be applied to performance assurance boards or committees where these are already in place?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 17:** Do you have any views on whether we should introduce performance assurance frameworks to the consolidated electricity technical code and electricity commercial code?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 18**: Do you agree with our preferred option of making the code manager decision maker for all code derogations?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 19**: In terms of sandbox derogations, do you agree that in the long-term there should be a harmonised process across all codes? Do you have views on our options for how SAF members are consulted on sandbox derogation requests?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 20:** Do you have views on what works well within existing sandbox derogation processes? Or views on what should change?

Comments:

#### Consultation section 5: BSC/REC cost recovery

**Question 21**: To what extent do you agree with the proposal to retain the existing code administrator cost recovery methodologies in the BSC and the REC? (Noting that appropriate consequential changes would need to take place)?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 22**: Are there any specific factors or concerns we should consider when carrying out the consequential changes required to implement the changes to the cost recovery mechanisms?

Comments:

#### Consultation section 6: Directing Central System Delivery Bodies

**Question 23**: To what extent do you agree with the proposed approach to issuing directions to responsible bodies for designated central systems, in particular the proposed consultation process?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 24**: Are there any factors we should consider when carrying out the consequential changes required to implement the power to direct responsible bodies for central systems?

Comments:

#### Consultation section 7: Implementation and assurance

**Question 25**: Do you have views on our approach to allocating roles and responsibilities to the range of implementation activities?

Comments:

**Question 26**: Do you have views on the completeness of the list of implementation activities, and how we expect to be assured of good outcomes?

Comments:

**Question 27**: Do you agree with our view on the responsibility individual stakeholders should have in readiness for the transition?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 28**: Are there specific ways we can facilitate timely industry readiness?

Comments:

**Question 29**: Do you agree with our proposed approach to the implementation and monitoring of the code manager candidate?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 30**: Do you agree with the list of products proposed for the final assurance assessment to demonstrate compliance with the standard licence conditions?

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

**Question 31**: Do you agree with our proposals on code consolidation (including use of workgroups, and early proposals on the common contractual framework)

[Please delete all but one bullet]

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know/no view

Comments:

#### Consultation section 8: Transition Plan

**Question 32**: Does our plan capture the critical path activities for a 2026 go-live for the phase 1 codes? If not, what is missing and how would it improve the deliverability of our plan?

Comments:

**Question 33:** Are there activities in the business-as-usual timetable for the codes you believe are important to build into our plan? What are they and why?

Comments:

### Template part 3: General feedback

We believe that consultation is at the heart of good policy development. We welcome any comments about how we’ve run this consultation. We’d also like to get your answers to the following questions.

|  |  |
| --- | --- |
| **Question** | **Response** |
| Do you have any comments about the overall process of this consultation? |  |
| Do you have any comments about its tone and content? |  |
| Was it easy to read and understand? Or could it have been better written? |  |
| Were its conclusions balanced? |  |
| Did it make reasoned recommendations for improvement? |  |
| Any further comments? |  |

#### Your response, data and confidentiality

You can ask us to keep your response, or parts of your response, confidential. We’ll respect this, subject to obligations to disclose information, for example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you *do* wish to be kept confidential and those that you *do not* wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we’ll get in touch with you to discuss which parts of the information in your response should be kept confidential, and which can be published. We might ask for reasons why.

If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the UK’s withdrawal from the European Union (“UK GDPR”), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.

If you wish to respond confidentially, we’ll keep your response itself confidential, but we will publish the number (but not the names) of confidential responses we receive. We won’t link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.