

Decision

Expansion of Data Best Practice (DBP) as a Code Obligation

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Ofgem consulted in June 2025 on proposals to embed Data Best Practice (DBP) Guidance within the governance framework of energy industry codes. DBP Guidance is a principles-based framework designed to enhance transparency, interoperability, and the strategic use of data across the energy sector. Respondents expressed strong support for expanding the requirement to comply with DBP Guidance to code governance but raised concerns regarding timing and delivery, opposing the use of licence conditions at this stage and recommending alignment with the phased licensing of Code Managers under the Energy Act 2023.

Having considered this feedback, Ofgem has decided to apply DBP obligations only to the Smart Meter Communication Licence (SMCL) at this time, as shown in the Associated Direction published alongside this decision. This targeted approach reflects industry support for DBP while addressing concerns about implementation and timing. Ofgem will continue engagement through code panels and publish a further consultation to clarify how DBP obligations will apply to licensed Code Managers in the future, ensuring a coordinated and proportionate transition.

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Executive summary

Ofgem is committed to ensuring that the energy sector transitions to net zero in a way that is equitable for consumers and contributes to national economic development. As the sector evolves, it faces increasing complexity, driven by the growth in energy assets, new operational roles, and more intricate interactions between market participants. This complexity introduces greater risks to the reliability of energy networks. In this context, digitalisation is essential to managing the system effectively.

To support this shift, energy stakeholders must enhance their understanding, structure, and sharing of data. This includes enhancing data granularity, enabling interoperability across systems, and fostering openness; underpinned by a recognition of the strategic value of data. Ofgem's key mechanism for promoting these improvements is Data Best Practice (DBP) Guidance, which has already been embedded in network licences planned to expand to cover more of the energy sector.

The June 2025 consultation proposed embedding DBP obligations via licence conditions, which would then be reflected in code modifications. While the aim of expanding DBP was widely supported, a majority of respondents objected to the use of licence conditions at this stage. Respondents preferred implementation after Code Manager licensing begins under the Energy Act 2023, which will be delivered in phases.

After having considered all responses, we have decided to proceed with the change to the Smart Meter Communication Licence (SMCL) to require the SMCL licence holder (Data Communications Company, hereafter DCC)¹ to comply with DBP Guidance. We propose to consult later in 2026 on introducing the requirement to comply with DBP Guidance in the Code Manager Standard Licence Conditions. This position has been reached following discussions with the Department for Energy Security and Net Zero (DESNZ) and other relevant stakeholders.

Subject to this expected consultation, Code Managers will be obliged to follow DBP Guidance from the point of being licensed.

To support cross-code consistency during the transition period, we have proposed an additional principle in CACoP which will require adherents to follow DBP Guidance. This will create uniformity across all relevant activities during the transition period. This approach will ensure that code governance remains transparent, fair, and aligned with DBP principles while new licensing arrangements are implemented. Most respondents supported the application of CACoP principles as a means of achieving uniformity across codes during the transition. To maintain continuity and effective co-ordination, we are discussing potential future placement of the Cross Code Digitalisation Steering Group (CCDSG) in the new energy code framework. This will enable a structured

¹ The term 'DCC' refers to the organisation appointed from time to time to deliver the Authorised Business under the Smart Meter Communication. The current SMCL holder is Smart DCC Ltd, a subsidiary of Capita Plc.

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approach to managing digitalisation priorities and ensure that cross-code initiatives remain aligned with reform objectives. We are also engaging with the DTS User Group and Electralink to align DBP implementation under the Data Transfer Service Agreement.

DBP Guidance is part of the foundation of digitalisation in the energy sector. Our next steps will focus on collaborative implementation, ongoing engagement, and reviewing the effectiveness of DBP in practice.

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1. Introduction

This section covers the essential context to our consultation to expand the obligation to follow DBP Guidance – Ofgem’s main tool for improving and standardising the use of data in the energy sector – into the Industry Codes.

- 1.1 In June 2025, Ofgem consulted on proposals to expand the application of Data Best Practice (DBP) Guidance by embedding it as a formal obligation within the governance framework of energy industry codes². DBP Guidance is a principles-based framework that supports transparency, interoperability, and strategic use of data across the energy sector. It has been a licence requirement for Transmission Operators (TOs), Gas Distribution Networks (GDNs), and the National Energy System Operator (NESO) since 2021, and was extended to Distribution Network Operators (DNOs) in 2023.
- 1.2 The consultation proposed introducing DBP obligations via licence conditions, which would trigger consequential code modifications. While the aim of expanding DBP was widely supported, most respondents objected to the use of licence conditions at this stage. Instead, they preferred that Ofgem wait until Code Managers are licensed under the Electricity Act 1989³ and the Gas Act 1986⁴ as amended by the Energy Act 2023⁵. Appointment of the first Code Managers is expected in 2026.
- 1.3 Respondents expressed strong support for embedding DBP directly into codes and agreed that DBP should be expanded to code governance. However, they raised concerns about timing and delivery mechanisms. Further details on these concerns are provided in Chapter 2 of this document.
- 1.4 We have listened to industry and will not proceed with all the minded-to positions as described in the consultation. Instead, we are proceeding to only amend the Smart Meter Communication Licence (SMCL) to create the obligation on DCC to follow DBP Guidance. We propose to consult later in 2026 on including requirements to comply with DBP guidance in the Code Manager licence.

Consultation

- 1.5 We consulted on expanding the obligation to follow DBP Guidance to selected code parties – namely code managers, code administrators, Central System

² [Data Best Practice as a Code Obligation | Ofgem](#)

³ [Electricity Act 1989](#)

⁴ [Gas Act 1986](#)

⁵ [Energy Act 2023](#)

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Delivery Bodies (CSDBs), and some code panels/secretariats. We sought views from organisations and people with an interest in digitalisation of the energy system, administration of energy codes, and code parties. We particularly welcomed responses from third parties that operate under energy codes, as well as from other stakeholders and the public.

- 1.6 This proposed method would have created an obligation on the licensee to raise modifications to the relevant code. We outlined the licence modifications required to enact our proposed change. We had proposed modifying the Electricity System Operator, Electricity Distribution, Electricity Supply, Gas Supply, and Gas Transporter, licences with consequential code modifications to oblige code bodies to follow DBP Guidance and produce Digitalisation Strategies and Action Plans (DSAPs). We have also proposed modifying the Smart Meter Communication licence to oblige DCC Ltd to follow DBP Guidance in its operations.
- 1.7 This approach would have combined enshrining DBP Guidance in the business-as-usual operation of the code with an enforceable requirement held in the license, enabling us to monitor compliance and take enforcement action should it become necessary.

Decision-making stages

- 1.8 We consulted from June 30, 2025, to August 11, 2025, and sought stakeholders' views on twelve questions. We received twenty-seven responses to the consultation and have considered all those responses in arriving at our decision. Stakeholders' non-confidential responses to the consultation have been published on our website alongside the published consultation⁶.
- 1.9 Below, we have set out each question, reflected on the contributions which stakeholders made in their responses, and addressed each theme with our decision and position.
- 1.10 In addition to the guidance documents, an Associated Direction document has been provided to assist licensees by specifying the organisations affected by the expansion of DBP as a code obligation. We have also amended the licence text for the SMCL, with the details of this change set out in Appendix 1.

Stage 1 Consultation open: 30 June 2025

⁶ [Data Best Practice as a Code Obligation | Ofgem](#)

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Stage 2 Consultation closes (awaiting decision). Deadline for responses: 11 August 2025

Stage 3 Responses reviewed and published: 14 January 2026

Stage 4 Consultation outcome (decision or policy statement): 14 January 2026

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2. Industry responses and our decisions reached.

This Section details the responses to questions asked in the consultation, and our decisions reached on the basis of industry feedback.

Questions 1 to 3 and Decisions Reached

Question 1

Do you have a view on the perceived necessity for this change? Are there any factors which you feel were not considered? Do you agree with our intent to expand DBP Guidance into the codes?

- 2.1 We received twenty-seven responses to this question, with twenty-six respondents in support of expanding DBP to the codes space. Out of the 26 respondents, fifteen were unequivocally supportive, while twelve were supportive, but with some suggestions or caveats. One respondent objected to the expansion to the codes.
- 2.2 We have grouped responses into key themes, which are outlined below, with sub-bullets representing the range of views or questions related to each theme. There is support for the proposed expansion, but respondents were clear it should be achieved at a proportionate cost.
- 2.3 In welcoming the changes, one respondent said, "... fully supports the expansion and has previously advocated for it. They note that while some code bodies already follow DBP voluntarily, a step change will be needed to move to mandatory compliance."
- 2.4 Some respondents said, "... supports the intent and describes Ofgem's approach as pragmatic." Another respondent stated, "agrees this is a logical step forward in the evolution of the industry." Another respondent stated, "The... agrees with the overall intent to improve access to energy systems data and requires parties to consider DBP guidance."
- 2.5 A respondent supporting the expansion of DBP Guidance to the code space but opposed the proposed minded to position stated "We agree in principle and highlight benefits such as improved interoperability and taxonomy. However, we oppose introducing licence changes before Code Manager licences are in place. We suggest pragmatic alternatives like informal agreements, volunteer-led code modifications, or reliance on CACoP." Another respondent stated, "We support DBP expansion but note complexity at the CDSP level. We recommend co-ordination with Ofgem's Code Reform team". Another respondent stated, "We support the intent for a cohesive

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approach, but believe implementing DBP via licence amendments before Code Manager appointments is premature. We recommend implementation via Code Manager licences to avoid duplication and inefficiency".

Decision reached

- 2.6 We have listened to the industry, and we will proceed with the expansion of DBP to industry codes. However, there was significant disagreement – detailed in Section 3 of this document – relating to the method proposed in our consultation. Consequently, we will not progress with our proposed method of simultaneously modifying licences to create consequential code modifications. Our approach is now to consult on the introduction of the obligation to follow DBP Guidance to the Code Manager Standard Licence Conditions, in line with industry recommendations. The intent to treat all codes the same and create uniformity through approach will necessarily shift to uniformity of outcome.

Question 2

Do you agree with the proposed deadline of six months after the licence condition is applied for consequential code modifications? If not, please state your reasons specific to the relevant code and modification process.

- 2.7 There were twenty-six responses to this question. Twelve respondents were happy with the proposed six-month deadline after the licence condition is applied for consequential code modifications. Out of the twelve respondents, some provided suggestions and recommendations. Thirteen objected to the six-month deadline and offered suggestions; one respondent rejected without comment. Most respondents that answered the question made no specific wording suggestions. One respondent did raise a suggestion for further explanation of the legal text on the definition of Data Custodian.
- 2.8 Most respondents who disagreed with this question believed that six months was too short and suggested that more time was needed. Some of the responses are: "Six months is too ambitious due to code backlogs and the monthly cadence of CCDSG. We recommend eight to ten months as more realistic." Another said, "Six months is likely insufficient, especially if code bodies need to prioritise other modifications". A similar suggestion is "We agree with a target deadline of 6 months but suggests it should not be a hard deadline, as delays may be justified by other pressing priorities". Another respondent said "We recommend a longer period of 9–12 months, citing the impact of the recent REMA decision on industry resource".

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- 2.9 An alternative proposal was that the six-month aim is reasonable, but Ofgem should be flexible and should treat each code modification on a case-by-case basis.
- 2.10 Another theme is that the timing is not right, and the cost needs to be understood, especially for codes undergoing consolidation, and recommends delaying implementation until licensed Code Managers are appointed or placing an obligation on existing administrators "to be ready". There are concerns that licence changes and code modifications are being proposed before the costs are understood. Two respondents suggested that funding parties should have complete information before committing to a modification.
- 2.11 Another respondent supports the 6 months proposal and stated "support the ambition but warns of feasibility issues due to competing priorities. Recommends simultaneous implementation across Uniform Network Code (UNC), Independent Gas Transporters Uniform Network Code (IGT UNC), and Data Service Contract (DSC)". Another respondent stated "... agrees the six-month deadline is generally sufficient under normal circumstances but raises concern that licensed parties do not have the power to implement changes, which could lead to a licence breach. Suggests Ofgem request code change proposals to embed obligations directly."

Decision reached

- 2.12 With reference to the previous decision, we are not proceeding with the changes to existing licence conditions giving rise to consequential code modifications, meaning the requirement for any deadline is no longer applicable. In this, we take on board feedback from industry, and will move instead to the previously stated approach of consulting on including the obligation to follow DBP Guidance in the Code Manager Standard Licence conditions.

Question 3

Do you agree with the minded-to position that an obligation to produce DSAPs is suitable and proportionate for code bodies? If not, what alternative would you propose to achieve the same or greater benefits?

- 2.13 There were twenty-five responses to this question. Twenty-two respondents support the production of DSAP and believe it is proportionate for code bodies. Out of the twenty-two respondents, sixteen had caveats, suggestions, and recommendations. Three stated 'no' with a caveat.

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- 2.14 Those who did not agree responded with "DSAP should be produced by Code Managers, not administrators," and the second respondent stated "Panel alone should not hold DSAP obligations; code administrators should be involved. We note that the modification itself is likely to require co-ordination by the code administrator and central data service provider in order to develop a new process to deliver a DSAP relating to data owned by industry parties. We believe this should be on reasonable endeavours basis rather than best endeavours as currently drafted."
- 2.15 The themes for those who responded with caveated approval or recommendations included;
- duplication,
 - cost,
 - governance clarity,
 - and the need for templates or phased implementation.
- 2.16 Some of the answers related to governance clarity and templates included: "We have proposed Ofgem draft DSAP documents for industry to review and approve through the UNC Committee governance process. This would make the DSAP a code related document and ensure that central governance is maintained", "Supportive, would like to see greater co-ordination across codes".
- 2.17 Regarding the risk of duplication and cost, respondents said, "We agree in principle, want to see the first cycles be light touch and focus on measurable and proportionate actions; aligned with DBP principles to prevent duplication." Another said, "Yes, but not sure about every 2 years, want to make sure aligned with other documents".
- 2.18 In a similar vein, another respondent said, "Agree, but think Strategy ought to be 5 years, not two years" and "We support DSAP obligation and call for regulatory consistency. As a principle, we believe consistency of regulation helps drive common understanding and reduces unnecessary complexity. Therefore, yes, we agree that an obligation to produce DSAPs is suitable and proportionate.

Decision reached

- 2.19 The holder of the Smart Meter Communication License will be obligated to publish DSAPs on the agreed cadence – which is to publish the first Digitalisation Strategy by end January 2027, and every two years subsequently - and to publish the first Digitalisation Action Plan by end July 2027, and every

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six months subsequently, as part of its obligations as decided in paragraph 3.41 – 3.44.

- 2.20 The obligation to produce DSAPs will apply to other Code Managers as and when the licence obligation is consulted on and Standard Conditions of the Code Manager licence determined by the Secretary of State. Nothing in this decision should be interpreted as preventing parties from producing DSAPs on a voluntary basis.
- 2.21 Assurance that the DBP Guidance is complied with will take the form of Authority-directed reviews on a proportionate cadence, following existing Ofgem Compliance and Assurance guidance and HMT Magenta Book principles. Prior to any review, we will inform obligated parties of the framework, template, or measurements being reviewed against. These will be based on the Intended Outcomes detailed in DBP Guidance.

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3. Licence Condition Changes by Code

Section summary

This Section sets out the legal wording we propose to insert in the Smart Meter Communication Licence condition and how such amendments will affect the relevant parties – code manager, code administrator, central system delivery body, or similar – through consequential code modifications.

Questions 4 to 12 and Decisions Reached

Question 4

Do you have any concerns, or can you see any risks or issues, with the proposed change to the Electricity System Operator Licence amending the BSC?

- 3.1 We received eight responses to this question.
- 3.2 One respondent stated no issues with this caveat: "Concerned that the licence entities can propose changes to code documents, but do not have the ability to implement the required changes expected of the entities, as this could result in a potential licence breach. We suggest that to remove these potential unintended consequences, Ofgem could request parties to raise a code change proposal to directly embed the obligation into the code document".
- 3.3 Other themes in the responses include:
 - success depends on clear alignment between NESO and Elexon/BSCCo,
 - security-sensitive material should follow restricted access routes; supports DBP requirements but suggests that delivery may be better suited to licensed Code Managers.

Decision reached

- 3.4 We have decided that we will not proceed with our proposed change to the Electricity System Operator License which would give rise to consequential code modifications to the BSC, as stated in the consultation. We propose to consult later in 2026 on including requirements to comply with DBP guidance in the Code Manager licence.
- 3.5 As different Code Managers will be licensed in three phases, the obligation to follow DBP will come live as they are licensed at different times. During the transition period, we will rely on CACoP principles and CCSDG to maintain alignment where practicable. The timeline will be included in the appendix 4.

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Question 5

Do you have any concerns, or can you see any risks or issues, with the proposed change to the Electricity System Operator Licence amending the CUSC, STC, and Grid Code?

- 3.6 This question received four responses agreeing with the minded to position, four responses stating the question was not applicable to them, and one respondent who stated they had no concerns.
- 3.7 One of the themes is "agree, seems sensible and clear, but request clarity of whether existing DSAPs are covered".
- 3.8 Themes mentioned in the responses were:
- Supportive of NESO and administrators are sufficiently resourced; recommends shared approach to metadata, triage, DSAP metrics, and user feedback,
 - unclear definition of "Energy System Data" and mention of potential duplication.
- 3.9 Direct quotes from respondents that illustrate the themes include:
- "We are supportive, provided NESO and administrators are sufficiently resourced, and delivery is co-ordinated across codes. Many datasets and change issues span CUSC, STC and Grid codes inconsistent approaches would raise costs and confuse users. A shared approach to minimum metadata, DBP triage, DSAP metrics and a 'single front door' for user feedback will minimise duplication and manage cross-code dependencies."
 - "Is it fully clear what Energy System Data means in the context of the Connection and Use of System Code (CUSC)?... As with the CUSC comments, clause E3.4 (e) also is a little unclear on where the full selection of current and past DSAPs will be published – with likely duplication."

Decision reached

- 3.10 We have decided that we will not proceed with our proposed change to the Electricity System Operator License which would give rise to consequential code modifications to the CUSC, STC and Grid Code, as stated in the consultation. Instead, we propose to consult later in 2026 on including requirements to comply with DBP guidance in the Code Manager licence.
- 3.11 As different Code Managers will be licensed in three phases, the obligation to follow DBP will come live as they are licensed at different times. During the

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transition period, we will rely on CACoP principles and CCSDG to maintain alignment where practicable. The timeline will be included in the appendix 4.

Question 6

Do you have any concerns, or can you see any risks or issues, with the proposed change to the Electricity Distribution Licence amending the Distribution Code?

3.12 This question received a total of eleven responses, with one respondent stating that they had no concerns. Four respondents agreed with the proposal, four respondents said that it was not applicable, and one respondent disagreed with the proposal. One respondent stated that it was not a statutory consultation.

3.13 The themes in the responses are:

- Supports leveraging existing DBP practice; recommends proportionate assurance via self-attestation and sample audits, Limited obligations under Distribution Code,
- IDNO applicability should be considered, keen to understand dates for change,
- task manageable within six months, supports DBP requirements but suggests delivery may be better suited to licensed Code Managers and wording acceptable,
- confusion around DSAP publication locations and duplication.

3.14 Some of the quotes that illustrate the themes are:

- ‘The proposed wording seems fine. There is slight confusion in 21.7A (j) (a) and (b) as to where the current and past DSAPs are to be published, with potential duplication’.
- ‘We are supportive. This is an evolutionary step that can leverage existing DBP practice across DNOs and the Distribution Code administrator to deliver proportionate catalogues, clear licensing and auditable triage while protecting security-sensitive information. Proportionate assurance, annual self-attestation with occasional sample audit overseen by the Distribution Code governance would be appropriate’.

Decision reached

3.15 We have decided that we will not proceed with our proposed change to the Electricity Distribution License which would give rise to consequential code

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modifications to the Distribution Code, as stated in the consultation. Instead, we propose to consult later in 2026 on including requirements to comply with DBP guidance in the Code Manager licence.

- 3.16 As different Code Managers will be licensed in three phases, the obligation to follow DBP will come live as they are licensed at different times. During the transition period, we will rely on CACoP principles and CCSDG to maintain alignment where practicable. The timeline will be included in the appendix 4.

Question 7

Do you have any concerns, or can you see any risks or issues, with the proposed change to the Electricity Distribution Licence amending the DCUSA?

- 3.17 This question received a total of thirteen responses. Four respondents answered 'not applicable' to them, one objected to the proposal, and two stated that it was not a statutory consultation. Five respondents agreed with the proposal. Out of the five respondents, three gave a caveat with their responses.

- 3.18 The themes from the responses are:

- Supportive of change but asks for implementation clarity;
- Suggesting a time-bound appeals route with privacy safeguards, and highlighting significant time and resource implications,
- Seeking clarity on dates but considers task manageable,
- Expressing confusion around DSAP publication locations and duplication and suggesting that additional time may be needed to consider closed and sensitive data.

- 3.19 Some of the quotes that illustrate the themes are:

- “We are supportive, with a need for implementation clarity. ElectraLink/DCUSA Ltd should set out how DBP triage will apply to DCUSA artefacts, what will be published and where, publication cadence and metrics for DSAP delivery, and proportionality for parties of different sizes. A short, time-bound appeals route for rejected requests, with security and privacy guardrails, would increase trust and predictability”.
- “We do not have concerns with the proposed amendments. We are keen to understand the dates for change to ensure modifications can be drafted in

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a timely manner. We believe this to be a manageable task within the 6-month timeframe”.

Decision reached

- 3.20 We have decided that we will not proceed with our proposed change to the Electricity Distribution License which would give rise to consequential code modifications to the DCUSA, as stated in the consultation. Instead, we propose to consult later in 2026 on including requirements to comply with DBP guidance in the Code Manager licence.
- 3.21 As different Code Managers will be licensed in three phases, the obligation to follow DBP will come live as they are licensed at different times. During the transition period, we will rely on CACoP principles and CCSDG to maintain alignment where practicable. The timeline will be included in the appendix 4.

Question 8

Do you have any concerns, or can you see any risks or issues, with the proposed change to the Electricity and Gas Supply Licences amending the REC?

- 3.22 This question received a total of ten responses. Two respondents stated that it does not apply to them. Five respondents answered, 'no issue' and agreed with the proposal. Three respondents disagreed with the proposal.
- 3.23 The themes in the responses are:
- Supportive on a phased basis, reuse of existing capabilities, and focus on visible user benefits.
 - Other parties to REC should also be considered, questions governance approach and suggests obligations on REC code manager.
 - Potential cost and change portfolio impacts.
 - Concern about placing obligations on all suppliers.
 - Suggests alignment with future licensed Code Managers.

Decision reached

- 3.24 We have decided that we will not proceed with our proposed change to the Electricity and Gas Supply Licences which would give rise to consequential code modifications to the REC, as stated in the consultation. Instead, we propose to consult later in 2026 on including requirements to comply with DBP guidance in the Code Manager licence.

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- 3.25 As different Code Managers will be licensed in three phases, the obligation to follow DBP will come live as they are licensed at different times. During the transition period, we will rely on CACoP principles and CCSDG to maintain alignment where practicable. The timeline will be included in the appendix 4.

Question 9

Do you have any concerns, or can you see any risks or issues, with the proposed change to the Smart Meter Communication Licence amending the SEC?

- 3.26 This question received a total of twelve responses. Two respondents stated that it does not apply to them. One respondent stated there are no obligations on their part and is not aware of any risks. Three respondents stated that they needed further clarification. Four respondents support the proposal, but two stated they agree with the proposal with a caveat in their answers.

- 3.27 Some of the themes by respondents are:

- Clarification of roles and responsibilities: some respondents sought clarity on shared versus individual obligations, alignment with Alt HAN governance, and the definition of the Data Custodian for certain datasets
- Impact and Scope concerns: some respondents emphasised the need for a clearer understanding of the potential impacts on DCC, Central Switching Services (CSS), and the management of sensitive information, and highlighted ongoing uncertainty within SECCo regarding the scope of data involved.
- Support for inclusion with condition- some respondents support alignment but recommend early engagement with SECAS/SECCo and the adoption of restricted access models and note that inclusion should be clearly scoped and proportionate.
- Additional consideration: some respondents expressed concerns regarding the ambiguity of the Data Custodian role and emphasised the need to ensure that DCC retains the ability to publish anonymised data.

- 3.28 One respondent said, "We request wording change from 'best endeavours' to 'all reasonable endeavours'. We do not have any concerns at this stage if the intention is that that the proposed wording and obligations remain consistent across all licence and code changes for all parties. " Another respondent said that they, " Support inclusion but request proportionate scoping".

Decision reached

- 3.29 We have decided that we will not proceed with our proposed change to the Smart Meter Communication License which would give rise to consequential

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code modifications to the SEC, as stated in the consultation. Instead, we propose to consult later in 2026 on including requirements to comply with DBP guidance in the Code Manager licence.

- 3.30 As different Code Managers will be licensed in three phases, the obligation to follow DBP will come live as they are licensed at different times. During the transition period, we will rely on CACoP principles and CCSDG to maintain alignment where practicable. The timeline will be included in the appendix 4.
- 3.31 While the change to the SMCL proposed in this question, namely one to create a consequential code modification in the SEC, is not being proceeded with, there will be changes made to the SMCL in order to oblige DCC to follow DBP Guidance, as detailed in the decision reached in response to Question 12, paragraphs 3.24 – 3.29.

Question 10

Do you have any concerns, or can you see any risks or issues, with the proposed change to the Gas Transporter Licence amending the UNC and IGTUNC?

3.32 This question received a total of fourteen responses. Two respondents stated that it does not apply to them. Two respondents support the proposal, but with a caveat. Ten respondents disagreed with the proposal and raised issues with the use of a licence condition in the document which did not apply.

3.33 The themes in the responses are:

- Concern that Independent Gas Transporters (IGT) may incur additional costs,
- A view that the obligation should be on Code Administrators,
- Some requests for corrected drafting relating to the appropriate licence condition, however supportive from the electricity networks' perspective,
- recommends staged adoption and outcomes-based obligations
- UNC/IGTUNC less advanced in DBP implementation, prefers placing full obligation in GNC; interim obligation for IGTs "to be ready
- opposes "best endeavours"; recommends obligations on Administrator,

3.34 Some of the quotes from respondents to support the themes are:

- “These proposals are broadly supported. Consistency across energy markets benefits data users, but implementation should account for differing capabilities and maturity across transporters and IGTs. Staged adoption where necessary, outcomes-based obligations, and alignment of

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user experience with electricity where sensible will help cross-market users”.

- “We could incur additional costs for the IGT UNC Code Administrator to undertake activities relating to the DSAP. The proposal places the obligation on Panels rather than the Code Administrator. We question the rationale for excluding the Code Administrator, given the Panel is a transient group of Parties. We support placing the obligation on the Code Administrator with the Panel overseeing delivery of DSAP and action plans. ...We encourage the supplementary consultation to capture the omission of large transporters via the UNC and the correct licence condition reference of A11. We recommend implementation aligns UNC and IGT UNC in delivery and timings and encourage collaboration to produce a consolidated DSAP given the impending transition to the Gas Network Code”.
- ‘The consultation’s Appendix 2 drafting under the ‘Uniform Network Code (Including Independent Gas Transporter Uniform Network Code)’ section only makes reference to the IGTs’ Condition 9... To respond effectively, we would expect corrected drafting to be reissued with adequate time for a response prior to any GT Licence amendments being enacted’.

3.35 Our June 2025 consultation proposed embedding DBP obligations via licence conditions to strengthen data governance across the energy sector. However, Licence Conditions A11 was inadvertently excluded from the consultation. This omission means that the ‘Independent Gas Transporters’ Uniform Network Code (IGT UNC), was excluded from the scope of our consultation. We acknowledge the use of the incorrect Special Licence condition SSC A9 instead of A11, which will include the Independent Gas Transporters, but not Gas Transporters.

Decision reached

- 3.36 We have decided that we will not proceed with our proposed change to the Gas Transporter License which would give rise to consequential code modifications to the UNC and IGTUNC, as stated in the consultation. Instead, we propose to consult later in 2026 on including requirements to comply with DBP guidance in the Code Manager licence.
- 3.37 As different Code Managers will be licensed in three phases, the obligation to follow DBP will come live as they are licensed at different times. During the transition period, we will rely on CACoP principles and CCSDG to maintain alignment where practicable. The timeline will be included in the appendix 4

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Question 11

Do you think this proposed principle merits discussion at the CACoP forum for inclusion in CACoP v7.0?

3.38 This question received a total of twenty responses. One respondent stated that it does not apply to the organisation. Eighteen respondents are supportive and in agreement with the proposal. One respondent disagreed with the proposal.

3.39 The responses are classified into three groups:

- No support for inclusion, noting that CACoP is expected to be discontinued and therefore its inclusion would have little practical effect.
- Support for inclusion in CACoP to ensure consistency, embed cross-code alignment, formalise expectations, and maintain service levels, recommending shared metrics, updated templates, and viewing it as a pragmatic alternative to broader licence changes.
- Recommendation and implementation- Some respondents who supported applying CACoP principles recommended using CACoP to agree common wording, coordinate cross-code arrangements, minimise the need for licence changes, and ensure DBP obligations are not duplicated

3.40 Some of the quotes to support the themes above are:

- “We believe the inclusion of the principle is right for discussion at the next CACoP Forum. Including a principle in the CACoP that obliges Code Administrators to follow DBP Guidance would formalise expectations across all Codes. We note the future form of CACoP is under review as part of the Code Reform programme but believe inclusion of the principle is right”.
- “We agree. Including a CACoP principle that code administrators follow DBP and publish DSAPs would embed cross-code consistency and transparency, complementing licence changes and giving users a common baseline of expectations and reporting.”
- “We believe it is appropriate to consider a new principle within CACoP However, we would not support duplicating DBP obligations. If DBP is embedded in licences and codes, the CACoP principle should act as a guiding statement, reinforcing alignment rather than creating an additional obligation”.

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Decision reached

- 3.41 We have decided to approve the addition of further CACoP principles as proposed in the consultation. These will apply during the transition period to ensure consistency of purpose and direction across all codes. This will support a smooth transition to the new governance model under energy code reform.
- 3.42 Respondents supported this approach, with only one respondent disagreeing, as pragmatic, noting that CACoP can formalise requirements, agree common wording, and provide avenue for cross code co-ordination. This will help deliver uniform service levels, reduce duplication, and avoid ambiguity in obligations, while ensuring alignment with DBP without creating overlapping requirements.

Question 12

Do you have any concerns, or can you see any risks or issues, with the proposed change to the Smart Meter Communication Licence?

- 3.43 This question received a total of ten responses. Two respondents stated that it does not apply to them. Five respondents support the proposal, but there are some caveats to consider. Three respondents did not state whether they agreed or disagreed, but they raised some points about DCC's status as a Data Controller.
- 3.44 Some respondents raised some issues concerning DCC's status as a Data Processor rather than a Joint Data Controller, and how that would interact with responsibilities under DBP Guidance. Another respondent requested changing "best endeavours" to "all reasonable endeavours" in clause 22.7(g) of the Smart Meter Communication License to better consider commercial and financial factors. The respondent did state it had no concerns as long the proposed wording and obligations remain consistent across all licence and code changes for all parties. Further to this, the respondent requested clarification on the definition of Data Custodian – as opposed to Data Controller or Data Processor.
- 3.45 It should be noted that, although the current Smart Meter Communication Licence is scheduled to expire in September 2027, the designated Transfer Date under Smart Communication Licence Condition 43⁷ is 1 November 2026. On this date, the successor licensee will assume responsibility for all authorised business. Consequently, the modifications set out in this decision

⁷ [Draft new Smart Meter Communication Licence | Ofgem](#)

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will only apply to the current licence for a period of less than one year, unless the Transfer Date is subsequently amended.

3.46 The themes in the responses are:

- Belief that costs must be considered, especially cost to other parties.
- Queries over the standard of obligation as ‘best endeavours’ as opposed to ‘all reasonable endeavours’.
- Discussion over Joint Data Controller as opposed to Data Processor, and the DBP term Data Custodian.
- Queries over demarcation of DCC and SEC Obligations, and overall clarity of obligation.
- Unclear who Data Custodian is for certain datasets.

3.47 Some of the quotes to support the themes are:

- “It may be that there are additional costs to parties as a result of the proposed changes which would need to be explored further”.
- “The DCC’s role and rights as a potential Data Custodian should be clarified, particularly around system-level data, to ensure aggregated operational data can be shared compliantly with appropriate safeguards”.
- “We support Ofgem’s minded-to position to place a direct obligation on Smart DCC Ltd to follow DBP Guidance and produce DSAPs. To ensure smooth implementation, we suggest clarifications on demarcation with SEC obligations, alignment of DSAP cadence with DBP Guidance, confirmation that DBP changes only follow statutory consultation. On this basis, we do not foresee material risks, provided these points are addressed and SMCL changes remain aligned with the ongoing DCC Review Phase 2 proposals”.
- “We support Ofgem’s minded-to position and propose replacing the term ‘best endeavours’ in clause 6.5A of the Smart Meter Communication Licence with ‘all reasonable endeavours’”.
- “We are exploring implications of transitioning from Data Processor to Data Controller to enable greater DCC autonomy over system data and welcome further discussions with Ofgem on this issue”.

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Decision reached

- 3.48 Currently, DCC is considered a Data Processor and is responsible for securely transmitting smart meter data without accessing or processing it beyond the transmission stage. We are exploring the possibility of changing DCC's status from Data Processor to Joint Data Controller.
- 3.49 While such a designation could help reduce administrative burden and enable DCC to make effective use of the data it collects, this change falls outside our statutory remit and cannot be implemented under our existing powers. However, we are exploring routes to this change through discussions with DCC and the SEC Panel.
- 3.50 There was no objection to the proposed changes to the Smart Meter Communication Licence (SMCL), other than the respondent who disagreed with the position of expanding the obligation to DBP Guidance to industry codes conceptually. Smart DCC Ltd, the current holder of the SMCL, expressed support for the amendments. Having considered all representations, we have decided to proceed with the proposed modifications to Condition 6 of the SMCL.
- 3.51 We have decided that SMCL holder will be obligated to follow DBP Guidance. This will be achieved through licence modification. The licence wording is as consulted on, with minor corrections for clarity and positioning of the legal text and provided in Appendix 1. Further to this, we have amended Part F: Interpretations, under paragraph 6.17 of the SMCL to provide pointers to the definitions referred to therein.
- 3.52 In addition to the obligation to follow DBP Guidance, the SMCL holder will be obliged to produce a DSAP every two years, and an Action Plan every six months following the publication of the initial Digitalisation Strategy, as proposed in the minded-to position.
- 3.53 With respect to the request to amend the wording from 'best endeavours' to 'all reasonable endeavours,' we will retain the existing wording in the guidance. The term 'best endeavours' is a standard applied to all parties following DBP Guidance under licence. Retaining the same standard ensures consistency across all licensees.
- 3.54 Introducing an alternative would risk creating a two-tier regulatory framework, which could undermine uniformity and fairness. Accordingly, the requirement in DSAP will remain 'best endeavours.'

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4. Conclusion and next steps

- 4.1 This decision reflects our considered response to stakeholder feedback on the proposed expansion of DBP Guidance into the energy code space. The consultation revealed strong support for DBP as a foundational framework for improving data governance, transparency, and interoperability across the sector. Of the twenty-seven responses received, twenty-six supported the expansion of DBP, with many recognising its value in enabling more efficient and secure data sharing across increasingly complex energy systems.
- 4.2 DBP is a foundational element of digitalisation in the energy sector. It is no longer viewed solely as a regulatory tool, but as a strategic enabler of innovation, system efficiency, and whole-system transformation. Respondents acknowledged DBP's role in assisting alignment with the Energy Act 2023 and energy code reform.
- 4.3 While the appetite for DBP is clear, stakeholders raised essential concerns regarding timing, cost, governance, and the method of implementation. In response, we have decided not to proceed with the proposed licence modifications across all codes.
- 4.4 Instead, we will proceed with the minded-to position of modifying the SMCL to oblige DCC to follow DBP Guidance. We propose to consult later in 2026 on including requirements to comply with DBP Guidance in the Code Manager licence. This phased approach ensures proportionality, regulatory clarity, and alignment with the timeline of the energy code reform programme.
- 4.5 We have consulted on the draft conditions for the successor SMCL⁸, with the final licence scheduled for publication by Q1 2026. The successor licence conditions will differ from the current licence, and the obligations introduced in this decision may consequently be moved under a different condition; however, our intent is to retain these obligations in the Successor Licence.
- 4.6 We will continue to engage with the industry to tailor assurance and engagement in meeting the obligation to follow DBP. The Cross Code Digitalisation Steering Group (CCDSG) will play a central role in harmonising digital maturity across codes and fostering a collaborative environment for sharing best practices.
- 4.7 Our next steps will focus on listening to the industry, reviewing the efficacy of DBP through a lens that balances openness with security, and preparing for further expansion into new areas of the energy sector. This includes supporting voluntary adoption ahead of formal obligations, enabling strategic

⁸ [Draft new Smart Meter Communication Licence | Ofgem](#)

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alignment through DSAPs, and ensuring that DBP remains a consistent and future-proofed framework for data excellence.

- 4.8 This decision is grounded in extensive engagement through code panels and the establishment and development of the Cross Codes Digitalisation Steering Group. These efforts have focused on identifying where DBP Guidance can deliver the greatest value within existing industry code frameworks, ensuring alignment with the objectives of the energy code reform programme under the Energy Act 2023. By embedding DBP principles into these structures, the decision aims to promote consistency, improve efficiency, and support a coordinated approach to digitalisation across all codes.

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Appendices

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Decision Expansion of Data Best Practice (DBP) as a Code Obligation**Appendix 1. – Legal Wording****Smart Meter Communication Licence**

Part B: Services forming the Mandatory Business of the Licensee

6.5 The Mandatory Business of the Licensee comprises the provision, for and on behalf of parties to the Smart Energy Code, where relevant, the Retail Energy Code, of the following Mandatory Business Services:

(a) Core Communication Services, being communication services (as specified and defined in the SEC) that relate solely to the Supply of Energy (or its use) under the Principal Energy Legislation, and that are provided by the Licensee under or pursuant to an Agreement for Services in accordance with Part B of Condition 17 (Requirements for the provision of Services);

(b) Elective Communication Services, being communication services (excluding Core Communication Services) that relate solely to the Supply of Energy (or its use) under the Principal Energy Legislation, and that are provided by the Licensee under or pursuant to an Agreement for Services in accordance with Part C of Condition 17;

(c) Enabling Services (as to which, see paragraph 6.6), being services that fulfil an enabling role (including making provision for the testing of services and equipment, and for ensuring the security of services) relating to the provision of Core Communication Services and Elective Communication Services, and the procurement and utilisation of all such resources (including, in particular, the Fundamental Service Capability that is detailed at Schedule 1 to this Licence) as may be necessary or expedient for the purposes of securing such provision; and

(d) The incorporation, delivery and provision of the Centralised Registration Service, in accordance with Condition 15.

6.6 The Enabling Services to which paragraph 6.5(c) refers are these:

(a) the Enrolment Service, being the service operated by the Licensee under an Agreement for Services in accordance with Part D of Condition 17;

(b) the Communications Hub Service, being the service provided by the Licensee under or pursuant to an Agreement for Services in accordance with Part E of Condition 17;

(c) the Interoperability Checker Service being the service provided by the Licensee under or pursuant to an Agreement for Services in accordance with Part D1 of Condition 17;

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(d) the Virtual WAN Provider Service being the service provided by the Licensee under or pursuant to an Agreement for Services in accordance with Part E1 of Condition 17; and

(e) Other Enabling Services, being any Enabling Services that are specified and defined as such in this Licence or the SEC (other than those services referred to by name in this paragraph 6.6) and that are provided by the Licensee under or pursuant to an Agreement for Services in accordance with Part F of Condition 17.

6.7 In providing as a Mandatory Business Service any service that has not previously been provided as such, the Licensee must ensure that its provision of that new or amended service does not materially prejudice or impair its continuing ability to provide other Mandatory Business Services that it is obliged to provide pursuant to the requirements of this Licence and the Agreements for Services that it has entered into under it.

6.7A In providing Mandatory Business, the licensee must, when conducting work that involves working with or making decisions about the use of Energy System Data, use its best endeavours to act in accordance with Data Best Practice Guidance.

6.7B The licensee must, publish a Digitalisation Strategy and Digitalisation Action Plan at intervals specified in the DSAP Guidance. The licensee must;

(a) publish its Digitalisation Strategy and Action Plan and updates to the Digitalisation Strategy and Action Plan on the licensee's website where they are readily accessible to the public.

(b) maintain an archive of all published versions of its Digitalisation Strategy and Action Plan on the licensee's website where they are readily accessible to the public.

(c) notify the Authority of any updates to its Digitalisation Strategy and Action Plan.

Part F: Interpretation

6.17 For the purposes of this condition:

Relevant Regulator means any person (excluding the Authority) that would have a statutory or other legal power to exercise any regulatory functions in relation to the provision (if approved) of the Value Added Service, and includes:

(a) the Office of Communications established by section 1 of the Communications Act 2003;

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(b) the Information Commissioner appointed by section 6 of the Data Protection Act 1998; and

(c) the Water Services Regulation Authority established by section 1A of the Water Industry Act 1991.

Value Added Services Date has the meaning given to that term in paragraph 6.9

Data Best Practice means a set of principles referenced to in the Data Best Practice Guidance Document

Data Best Practice Guidance means the document of that name issued by the Authority in accordance with 6.7A of Part B of the Smart Meter Communication Licence.

Digitalisation Strategy refers to a document prepared and published by the licensee in accordance with 6.7B of Part B of the Smart Meter Communication Licence.

Digitalisation Action Plan refers to a document prepared and published by the licensee in accordance with 6.7B of Part B of the Smart Meter Communication Licence

Energy System Data has the meaning given to that term in the Data Best Practice Guidance

Decision Expansion of Data Best Practice (DBP) as a Code Obligation**Appendix 2. – Glossary**

Terms	Definitions
Balancing and Settlement Code (BSC)	The Balancing and Settlement Code contains the rules and governance arrangements for electricity balancing and settlement in Great Britain. This code is administered by Elexon
Certificate	A file or electronic password that proves the authenticity of a device, server, or user through the use of cryptography and the Public Key Infrastructure (PKI) Authentication of same helps ensure that only trusted devices and users can connect to their networks.
Code Manager	An organisation which holds a Code Manager licence and pursues activities in accordance with the terms of that licence. To distinguish from organisations currently called code managers, but not presently operating under licence, this term is capitalised.
Data Asset	Any entity that is comprised of data. For example, a database is a data asset that is comprised of data records. A data asset may be a system or application output file, database, document, or web page. A data asset also includes a service that may be provided to access data from an application. For example, a service that returns individual records from a database would be a data asset. Similarly, a web site that returns data in response to specific queries (e.g. www.weather.com) would be a data asset. This definition is taken from National institute of Standards and Technology (NIST).
Data Best Practice Guidance	Principles and expectations for licensees to follow when preparing Digitalisation Strategies and Action Plans. Part of Ofgem's standards for data and digitalisation.

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Data Controller	The person (usually an organisation) who decides how and why to process data. Definition taken from ICO.
Delivery Body	An entity responsible for overseeing, managing and driving forward initiatives, to meet the expectations of the role.
Digitalisation	Integration of data tools into energy system planning and operations.
Digitalisation Strategy and Action Plan (DSAP)	As part of RIIO-2 price controls and Ofgem's standards for data and digitalisation, relevant licensees must prepare and update Digitalisation Strategy and Digitalisation Action Plans detailing the strategic approach taken by an organisation and the organisation's plan to digitalise its Products and Services.
Energy Networks Association (ENA)	The Energy Networks Association is a not-for-profit industry body representing energy network operators in the UK and Ireland.
Energy System Data	Data which describes the energy system and its operation (current, historic and forecast), including the presence and state of infrastructure, operation of the system, associated market operations, policy and regulation.
Gas Distribution Network (GDN)	A company that operates the gas distribution network that transports gas from the transmission system to homes and businesses.

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Metadata	Data that provides information about a dataset that makes tracking and working with multiple datasets easier.
National Cyber Security Centre (NCSC)	The NCSC acts as a bridge between industry and government, providing a unified source of advice, guidance and support on cyber security, including the management of cyber security incidents.
National Energy System Operator (NESO)	The company that, in future, is expected to be designated as the ISOP. NESO will be an independent, public corporation responsible for planning Britain's electricity and gas networks and operating the electricity system. See also the definition of 'System Operator'.
Personal Data	Any information relating to an identified or identifiable natural person ('data subject'). Definition taken from ICO.
Smart Energy Code (SEC)	The Smart Energy Code (SEC) is a multi-Party agreement which defines the rights and obligations of energy suppliers, network operators and other relevant parties involved in the end-to-end management of smart metering in Great Britain.
Smart Meter Communication Licence	Smart DCC operates under the Smart Meter Communication Licence which was granted by Government and is regulated by Ofgem. The licence allows Smart DCC to establish and manage the smart metering data and communications infrastructure.
Standard Licence Condition (SLC)	Standard Licence Conditions are conditions that apply to all licensees of a particular licence type. These can be in and out of effect for licensees.

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UK GDPR	The UK version of the EU General Data Protection Regulation, as amended and incorporated into UK law from the end of the transition period by the European Union (Withdrawal) Act 2018 and associated Exit Regulations. The government has published a Keeling Schedule for the UK GDPR which shows the planned amendments.
Whole system	An approach that considers the gas, electricity (transmission and distribution) networks as well as the impact the heat and transport sectors and wider industry have on the system.

Decision Expansion of Data Best Practice (DBP) as a Code Obligation

Appendix 3. – CACoP Listed Principles

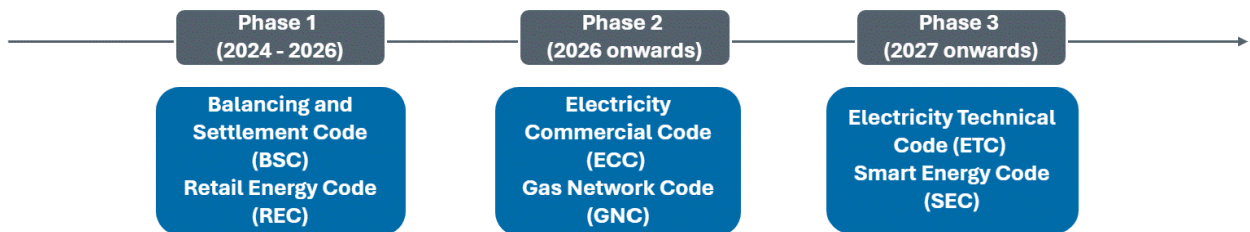
What are the Code Administration Code of Practice Principles?

The 17 CACoP principles are: (with proposed principles in bold.)

1. Code Administrators shall be critical friends
2. Documentation published by Code Administrators shall be in clear English
3. Information will be promptly and publicly available to users
4. The CACoP will be reviewed periodically and subject to amendment by users
5. Code Administrators shall support processes which enable users to access a 'pre-Modification' process to discuss and develop Modifications
6. A proposer of a Modification will retain ownership of the detail of their solution
7. Code Administrators will facilitate alternative solutions to issues being developed to the same degree as an original solution
8. Estimates of implementation costs to central systems will be produced and consulted upon prior to a Modification being recommended for approval
9. Legal text will be produced and consulted upon prior to a Modification being recommended for approval
10. Modifications will be consulted upon and easily accessible to users, who will be given reasonable time to respond
11. There will be flexibility for implementation, to allow proportionate delivery times and realisation of benefits
12. The Code Administrators will report annually on agreed metrics
13. Code Administrators will ensure cross Code co-ordination to progress changes efficiently where Modifications impact multiple Codes
14. Code Administrators shall support prospective energy innovators
15. Code Administrators shall endeavour to provide an assessment of the impacts of a Modification on the end consumer and on the drive for net zero
16. Code Administrators shall provide support for Code Reform
- 17. Code Administrators shall, when conducting work that involves working with or making decisions about the use of Energy System Data, use its best endeavours to act in accordance with Data Best Practice Guidance.**

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- 18. Code Administrators shall publish a Digitalisation Strategy and Digitalisation Action Plan (DSAP) at intervals specified in the DSAP Guidance.**

Decision Expansion of Data Best Practice (DBP) as a Code Obligation**Appendix 4. -Planned timelines for Code Manager appointment**

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Appendix 5. -List of obligated parties

Smart DCC Limited

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Appendix 6. -Applicable consultations

Consultation – Preliminary Strategic Direction Statement for industry codes

[Preliminary Strategic Direction Statement for industry codes.](#)

Consultation on the preliminary Strategic Direction Statement (SDS) and accompanying governance changes for industry codes- 31 January 2025

[Consultation on the preliminary Strategic Direction Statement and governance arrangements for industry codes | Ofgem.](#)

Consultation on reforming the energy industry codes- 23 July 2019.

[Consultation on reforming the energy industry codes | Ofgem.](#)

Consultation – Second consultation on the implementation of the energy code reform- 3 April 2025

[Energy code reform: second implementation consultation | Ofgem](#)

Consultation on changing the definition of Energy System Data (ESD) in Data Best Practice (DBP) Guidance- 22 April 2024

[Consultation on changing the definition of Energy Systems Data in Data Best Practice | Ofgem](#)

Decision to change the definition of Energy System Data (ESD) in Data Best Practice (DBP) Guidance- 8 October 2024

[Decision on definition of Energy System Data in data best practice guidance | Ofgem](#)

Open letter regarding Data Best Practice and its future in codes- 14 March 2024

[Open Letter regarding Data Best Practice and its future in Codes | Ofgem](#)

Decision on the amended DBP Guidance and DSAP Guidance- 7 August 2023.

[Decision on updates to Data Best Practice Guidance and Digitalisation Strategy and Action Plan Guidance | Ofgem](#)

Revisions to Data Best Practice Guidance and Digitalisation Strategy and Action Plan Guidance- 28 February 2023.

[Consultation on updates to Data Best Practice Guidance and Digitalisation Strategy and Action Plan Guidance | Ofgem.](#)

Consultation on Data Best Practice and Digitalisation Strategy and Action Plan Guidance- 25 May 2021

[Consultation on Data Best Practice guidance and Digitalisation Strategy and Action Plan guidance | Ofgem](#)

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Decision on Data Best Practice and Digitalisation Strategy and Action Plan Guidance-
15 November 2021.

[Decision on Data Best Practice Guidance and Digitalisation Strategy and Action Plan
Guidance | Ofgem](#)

Consulting on a draft version of the new Smart Meter Communication Licence (SMCL)-
8 September 2025

[Draft new Smart Meter Communication Licence | Ofgem](#)