

Charles Clark
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08 August 2025

Dear Charles,

Consultation on Proposed Directions to Data Best Practice as a Code Obligation

BUUK Infrastructure (BUUK) welcomes the opportunity to respond to the consultation regarding proposed Code Obligations relating to Data Best Practice. This letter presents an overview of our business and discusses our views on the proposed consultation.

Overview of our business

BUUK is the leading UK multi-utility infrastructure investor, working across Great Britain and competing with incumbent utility companies.

Our initial interest in utilities began with ownership of regulated gas networks and we have gradually expanded our portfolio into other utility sectors including electricity, fibre, water, wastewater, and heat.

Summary of BUUK views

We support the proposal to introduce Data Best Practice as a Code Obligation, and have been active members of the Cross-Code Digitalisation Steering Group (CCDSG) since its inception. We agree that the digitalisation project as a whole is a positive step in improving energy data and the Data Best Practice concept is an established principle that we welcome.

We broadly agree with Ofgem's proposals and have included some comments and suggestions on considerations we have identified. As referred to in the consultation, the ongoing work into Energy Code Review means that the Independent Gas Transporters Uniform Network Code and the Uniform Network Code will align to create the Gas Network Code. We strongly encourage that consideration be given to the IGT UNC and UNC Code Bodies working together to ensure a seamless transition to the impending GNC and the new Code Manager.

We understand that amendments are required to the drafted legal text to deliver the desired proposal for the Uniform Network Code. We agree with this proposition ensuring it considers a consistent approach with the IGT UNC and subsequently a congruent approach with the wider energy Code Bodies. Subsequently, we would welcome a further consultation on Ofgem's DBP Code obligations following the Large Transporter Licence correction consultation and Ofgem findings and following discussions and clarification which took place

at the CCDSG on 5th August. This would enable all parties, including those not present at the discussions on 5th August, to be able to provide final informed views on the Ofgem proposals.

Yours Sincerely,

Charlotte Gilbert

Senior Regulatory Analyst

Appendix 1 – Answers to Consultation Questions

Q1. Do you agree with our intent to expand DBP Guidance into the codes?

It makes sense to have a standardised approach that is utilised across the industry for data and its best practice, which BUUK support.

It has been a licence condition for Transmission Operators (TOs), Gas Distribution Networks (GDNs), and the Energy System Operator/National Energy System Operator (ESO/NESO) since 2021, with DNOs being obligated to follow since March 2023. Thus, highlighting its existing action in industry.

Q2. 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.

The deadline of six months is ambitious to execute this across all codes, and we believe this will likely be insufficient time to undertake the necessary work.

As was discussed in the Cross Code Steering group, there is a backlog in many of the codes, and would likely require urgent modification status to drive it through - the modification would also have to fit the criteria as established by Ofgem.

We would recommend Code Bodies working together, in particular IGT UNC and UNC Code bodies, in order to maintain a consistent approach and reduce the risk of varied approaches to, what should be, common data. If Ofgem are proposing the CCDSG as an appropriate collaborative forum, the cadence of those is monthly, which means that 6 months implementation following direction would be a challenge.

We believe that 8-10 months is a more realistic timeframe for modifications to be developed and implemented. This could apply to all Codes and their relevant processes.

Q3. 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?

We are under the impression that all code bodies would be able to produce a DSAP. We support Ofgem's view of allowing Code Bodies to have a 'bedding in' time of two years before any formal actions are taken. Though the detail and level of DSAP being asked to produce is not explicit and could vary. It may be that a skeleton template could be produced by Ofgem to provide consistency. We would welcome any guidance taking into account potential additional costs parties may face for Code Administrators producing DSAPs, weighed against the relevant benefits.

Q4. 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?

No identifiable risks or issues.

Q5. 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?

No identifiable risks or issues.

Q6. 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?

No identifiable risks or issues.

Q7. 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?

Though we do not see any reason for these changes to prevent amendments to DCUSA, additional time may be needed to consider closed/sensitive data.

Q8. 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?

No identifiable risks or issues.

Q9. 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?

Greater understanding on how this would impact the DCC and CSS and subsequently any sensitive information would need to be further explored.

Q10. 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?

It may be that IGT could incur additional costs for the IGT UNC Code Administrator to undertake activities relating to the DSAP.

The proposal currently places the obligation on the respective Panels, rather than the Code Administrator themselves. We would question as to what the rationale behind excluding the Code Administrator is here, given that the Panel is a transient group of Parties. We would support the obligation being placed on the Code Administrator as well, with the Panel overseeing these obligations to ensure the DSAP and any action plans were delivered. This matter was discussed at CCDSG on 5th August where parties were in agreement that there should be a consistent approach. We would welcome clarification on how this will be done, either through the secondary GDN Licence Condition consultation or by other means.

As per the discussions held at the Ofgem Cross Code Steering Committee (CCSC) on the 5th August 2025, we would encourage the supplementary consultation to capture the omission of large transporters via the UNC, and the correct licence condition reference of A11.

We would recommend that any implementation post-supplementary consultation involves the UNC and IGT UNC being aligned in delivery and timings of the consultation exercise.

We would also encourage collaborated working between the IGT UNC and UNC to produce a consolidated DSAP, given the impending transition to the Gas Network Code.

Q11. Do you think this proposed principle merits discussion at the CACoP forum for inclusion in CACoP v7.0?

We would agree that the proposed principle merits discussion at the CACoP forum, for potential inclusion in CACoP v7.0 to allow for a consistent approach. It would be beneficial for DBP to be fully immersed across the industry if the aim is still for the codifying of the obligation being undertaken ahead of Energy Code Reform.

Q12. Do you have any concerns, or can you see any risks or issues, with the proposed change to the Smart Meter Communication Licence?

It may be that there are additional costs to parties as a result of the proposed changes which would need to be explored further.