

## Public

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### **Consultation – Data Best Practice as a Code Obligation**

Dear Charley Clark,

#### Who we are

NESO lies at the heart of the energy system as an independent, public corporation responsible for planning Great Britain's electricity and gas networks, operating the electricity system and creating insights and recommendations for the future whole energy system.

At the forefront of our efforts is delivering value for consumers. We work with government, regulators and our customers to create an integrated future-proof system that works for people, communities, businesses and industry.

NESO's primary duty is to promote three objectives: enabling delivery of a cleaner, affordable and reliable energy system for current and future consumers. NESO will take a whole system approach, looking across natural gas, electricity and other forms of energy and will engage participants in all parts of the energy ecosystem to deliver the plans, markets and operations of the energy system of today and the future.

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### Our key points

- We are supportive of Ofgem's aims to establish Data Best Practise within the energy codes.
- We have supported Ofgem's Cross Codes Digitalisation Steering Group (CCDSG) and consider the proposals to be a pragmatic approach to achieve their aims.
- We note that NESO already follows Ofgem's Data Best Practise guidelines, and so our additional activities, assuming these proposals are taken forward, would be limited to raising the relevant code modifications described in this consultation.

We look forward to engaging with you further. Should you require further information on any of the points raised in our response please contact Daniel Arrowsmith, Commercial Code Change manager at [daniel.arrowsmith@neso.energy](mailto:daniel.arrowsmith@neso.energy) or Sarah Carter, Code Governance Manager at [sarah.carter@neso.energy](mailto:sarah.carter@neso.energy).

Yours sincerely

Penny Garner

Head of Market Frameworks

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## Appendix 1 Consultation Question Responses

**Question 1: Do you agree with our intent to expand DBP Guidance into the codes?**

NESO agrees with Ofgem's intent to expand Data Best Practice Guidance into the codes – this is a key vehicle for ensuring data quality within the energy industry. The approach proposed by Ofgem is a pragmatic way of achieving this, which NESO supports.

**Question 2: Do you agree with the proposed deadline 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.**

When this deadline was discussed at the last Cross Codes Digitalisation Steering Group (CCDSG), NESO's only reservation to the six month deadline was that a REMA decision from UK Government might be imminent, and that if a REMA decision was made, that could have a significant impact on industry resource.

Given that a REMA decision has been made during the period this consultation has been open, NESO believes a longer period, of perhaps nine to twelve months, should be given.

**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?**

NESO agrees with Ofgem's minded-to position, and in fact NESO already complies with Data Best Practice Guidance, including in producing DSAPs.

**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?**

NESO does not have any concerns with the proposed change to the Electricity System Operator Licence amending the BSC, other than that described in our response to Question 2.

**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?**

NESO does not have any concerns with the proposed change to the Electricity System Operator Licence amending the CUSC, STC and Grid Code, other than that described in our response to Question 2, and other than noting that consideration needs to be given (if not considered already) to the application to IDNOs, and where this would be best captured.

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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?

NESO has limited obligations under the Distribution code. As noted above, how this applies to IDNOs needs to be considered. Aside from that, NESO is aware of no risks or issues with this proposed change.

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?

NESO has no obligations under the DCUSA, and is aware of no risks or issues with this proposed change.

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?

NESO has no obligations under the REC, and is aware of no risks or issues with this proposed change.

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?

NESO has no obligations under the Smart Meter Communication Licence, and is aware of no risks or issues with this proposed change.

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?

NESO has limited obligations under the UNC and IGTUNC. NESO is aware of risks associated with the UNC and IGTUNC, which the IGT UNC Modification Panel will be raising separately.

Question 11: Do you think this proposed principle merits discussion at the CACoP forum for inclusion in CACoP v7.0?

NESO considers it reasonable to discuss this proposed principle at the CACoP forum for potential inclusion in CACoP v7.0.

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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?

NESO has no obligations under the Smart Meter Communication Licence, and is aware of no risks or issues with this proposed change.