**Electricity Distribution**

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8th August 2025

Dear Charley,

**Re: Data Best Practice as a Code Obligation**

I am writing on behalf of National Grid Electricity Distribution (South Wales) plc, National Grid Electricity Distribution (South West) plc, National Grid Electricity Distribution (East Midlands) plc and National Grid Electricity Distribution (West Midlands) plc, collectively known as “NGED”.

Thank you for giving NGED the opportunity to respond to the Consultation: Data Best Practice as a Code Obligation published on 30th June 2025.

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

Yes, we agree with the intent to expand Data Best Practice into the industry codes. As each code is taking strides toward digitalisation it is prevalent to action this now. It will be imperative to have the codes aligned with the new data processing being introduced by the MHHS Programme and to be aligned with the Consumer Consent Portal work.

Q2. 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.

Yes, we believe that the proposed deadline is achievable. However, we would highlight that where codes are to be combined (ETC/ECC) it may be more efficient to ensure that the wording is aligned; this would ensure that the DBP Guidance could be easily assimilated. The wording of the code modifications could be agreed at the CACoP forum by Code Managers & Administrators or by cross party agreement.

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?

Yes, we agree with the minded-to position. The DCUSA already produces a Digitalisation Strategy, so this will be easily continued. We believe that many Code Bodies produce this in their annual planning, but could publish as a separate document for industry.

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?

NGED do not have concerns with the proposed amendments. We are keen to understand the dates for change, as to ensure modifications can be drafted in a timely manner. We believe this to be a manageable task within the 6 month timeframe though.

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?

NGED do not have concerns with the proposed amendments. We are keen to understand the dates for change, as to ensure modifications can be drafted in a timely manner. We believe this to be a manageable task within the 6 month timeframe though.

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

As previously highlighted, the CACoP forum could be utilised by Code Managers and Administrators to agree commonality of wording for each Code Legal Text for DBP (there should not be a requirement to have aligned formatting for DSAPs). If we look ahead to Code Reform, we should avoid implementing further barriers to amalgamation; ie, we should introduce alignment between CUSC and DCUSA ahead of the implementation of the ECC.

Yours sincerely,

Rachael Prosser

National Systems Manager

National Grid Electricity Distribution