

Charley Clark via email

digitalisation@ofgem.gov.uk

11th August 2025

Ofgem Consultation - Data Best Practice as a Code Obligation

Dear Charley,

I am pleased to share TALAN views on the recent consultation, Data Best Practice as a Code Obligation.

Gemserv, is now part of Talan. This Talan response draws on the wealth of Gemserv experience working with industry parties across different codes, delivering, and designing compliant solutions across the industry.

TALAN is a provider of services to several industries, including Financial, Insurance, Health, and Energy. The wider TALAN team brings diverse knowledge and experience that strengthens our ability to meet the challenges of the new digital world. We have experts in fields such as data science, artificial intelligence, and project management, all dedicated to delivering innovative and effective solutions. We are pleased to be able to leverage these skills and experience, building on the great legacy of Gemserv, in the next stage of energy Code development.

The annex to this letter includes our response to the consultation questions. We have responded to the questions concerning the principles and timing of the proposals rather than Code specific issues.

Should you have any follow up questions or clarifications, please contact james.higgins@talan.com

Yours sincerely,



James Higgins

Director of Future Markets

Annex 1 - TALAN Response - Ofgem Consultation, Data Best Practice as a Code Obligation

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

Yes. We agree with the intent to expand the DBP Guidance across industry codes.

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.

We do not believe the timing is right. We understand the rationale for implementing the policy as quickly as possible, but we believe a delay would be better for codes, especially those that will be undergoing consolidation.

We are not proposing a complete standstill, however, by requiring implementation before consolidation has occurred, risks duplication of effort and resource across codes. Waiting for the licensed Code Manager appointment, would enable better preparation and alignment (across existing and future code bodies), and deliver an efficient implementation. If there is concern that this approach would lead to further delays, we suggest that placing an obligation “to be ready” on existing Code Administrators, included with a requirement for the new Licensee to develop work plans collaboratively, would provide a better outcome.

We are unconvinced that the decision to implement the policy via Code modifications is the right approach. The proposals to make licence changes and for Licensed Parties to propose Code modifications, seems to be introducing the policy before the costs of implementing the delivery of Data Best Practice is known. We are not against the introduction, we believe the principle to be right, but we do think that industry Parties funding Codes, should have all the information to hand before proposing the Code modifications, for what is in effect a policy driven change from Ofgem, rather than an industry proposal.

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 agree with the principle of placing an obligation on Code bodies to produce Digitalisation Strategy Action Plans (DSAP) but there is a need for time to enable all parties to review and agree the full scope of the work to deliver, implement, and maintain the DSAP. As indicated in our response to Question 2, there is a need to fully understand the costs. As a new and additional service requirement, Code bodies, will need to prepare proposals outlining the form the DSAPs will take, along with indicative pricing for delivery and ongoing monitoring, for approval by funding Parties.

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

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.