

# Decision

## Energy code reform – decision on statutory consultation on modifications to industry codes to implement the harmonised code modification prioritisation process

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This document sets out our decision to implement modifications to industry codes, using our transitional powers under schedule 12 to the Energy Act 2023, to introduce a consistent code modification prioritisation process.

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## Executive summary

Energy code reform is delivering major changes to the code governance framework to enable industry rules to keep pace with the transformation taking place across our energy system. The reforms are designed to facilitate the delivery of strategic priorities and improve the efficiency of the code change process. This will mean industry codes are agile and responsive to system change and will also improve code user experience to encourage innovation and reduce regulatory burden. Effective and consistent prioritisation of code modifications is a key part of achieving these outcomes.

This document sets out our decision to implement a new harmonised code modification prioritisation process, using the powers set out in the Energy Act 2023. This process will enable more efficient and transparent code governance arrangements, support the implementation of the strategic direction statement (SDS), and facilitate the transition to code manager appointment.

We have decided to make modifications to the following industry codes, using our transitional powers under schedule 12 to the Energy Act 2023:

- Balancing and Settlement Code (BSC)
- Connection and Use of System Code (CUSC)
- Distribution Code (D-Code)
- Distribution Connection and Use of System Agreement (DCUSA)
- Grid Code
- Independent Gas Transporters' Uniform Network Code (IGT UNC)
- Retail Energy Code (REC)
- Security and Quality of Supply Standard (SQSS)
- Smart Energy Code (SEC)
- System Operator Transmission Owner Code (STC)
- Uniform Network Code (UNC)

These changes will introduce a harmonised process for prioritising code modification proposals into these codes. This includes introducing prioritisation criteria, categories, and reporting processes. This codified process is then supported by additional guidance, which will help code panels to undertake consistent prioritisation determinations.

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This decision follows our consideration of stakeholder feedback submitted in response to our [statutory consultation on establishing a harmonised prioritisation process in the industry codes](#), published on 20 November 2025. The effect of these modifications is to amend the relevant codes to include the new harmonised code modification prioritisation process. We expect these modifications to take effect on 29 May 2026. To support implementation, we have also published a decision notice, a finalised guidance document and annexes setting out the relevant code text changes. Separately, we have published the guidance [here](#) for code parties' use.

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## Introduction

### Energy code reform

- 1.1 Energy code reform is modernising Great Britain’s energy regulation by replacing complex, outdated governance with a simpler, more agile and forward-looking framework. Many of the rules that govern the operation of the energy system sit within industry codes. These codes set the rules for a wide range of commercial and technical activities from how parties connect to the electricity and gas networks, to how consumers switch suppliers, to who can access consumption data.
- 1.2 These rules need to keep pace with the transformation happening within our energy system. But taken together, they form a complex and fragmented landscape that can slow innovation, limit competition and hold back investment. Many of the policy and market improvements designed to deliver consumer benefits depend on changes to the codes, but progress can be delayed by friction and competing interests within the current governance arrangements.
- 1.3 Energy code reform is a joint programme between Ofgem and government to address this and turn energy codes into an effective engine for wider system change. It will replace the current industry governance process for updating the codes with a new framework, as enabled by part 6 of the Energy Act 2023.
- 1.4 The reform supports Ofgem’s Market Strategy and Vision, as part of the low-cost transition. By empowering independent code managers, strengthening strategic direction and improving the change process, system change can be delivered quickly and with greater confidence. It is also designed to improve code-users’ experience by reducing the number of processes industry must navigate and cutting down on friction, complexity and wasted effort. Consolidation and simplification of the codes will make it easier for market participants to understand the rules that apply to them, reduce compliance burden and remove barriers to entry and innovation.
- 1.5 The reform introduces several key improvements to the current framework, including Ofgem licensing new code managers who will be responsible for leading code modifications and decision-making and ensuring that the codes develop in line with Ofgem’s annual strategic direction statement (SDS).<sup>1</sup> Industry expertise

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<sup>1</sup> Under section 190(1) and (2) of the Act, Ofgem must publish an annual strategic direction statement (SDS) for designated documents. As set out in section 190 (3) of the Act, the SDS must contain a strategic assessment of government policies, and of developments relating to the energy sector, that Ofgem

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will remain at the heart of the framework, shaping and developing robust code change proposals and playing a vital role in the process through new stakeholder advisory forums.

## Harmonising the code modification prioritisation process

- 1.6 We have decided to harmonise the code modification prioritisation processes across all codes, in advance of appointing the first code managers in order to bring forward some of the benefits of energy code reform. Under existing code modification processes, some codes contain processes that allow code panels to determine the priority of a modification proposal, although methods, criteria, and ways of publishing prioritisation decisions differ across these codes.<sup>2</sup>
- 1.7 We consider that harmonising these processes across relevant codes will enable more efficient and transparent code governance arrangements, support the implementation of the SDS and facilitate the transition to code manager appointment. This will help to implement the Act and support the aims of energy code reform.

## August 2025 decision to proceed to consultation

- 1.8 In our August 2025 [Decision on the preliminary Strategic Direction Statement and governance arrangements for industry codes](#) we responded to feedback on our January 2025 [Consultation on the preliminary Strategic Direction Statement and governance arrangements for industry codes](#). We presented our conclusions and rationale for our proposed policy positions. We set out proposed development of policy from the [January 2025 consultation](#), based on stakeholder feedback, but did not make decisions on policy positions related to the prioritisation process within that publication.
- 1.9 We also published an updated proposed code text changes document,<sup>3</sup> and a new proposed guidance document on code modification prioritisation,<sup>4</sup> intended to facilitate accurate and consistent prioritisation determinations. That

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considers will or may require the making of modifications to designated documents; and cover such other matters relating to designated documents as the Secretary of State may specify in regulations

<sup>2</sup>The BSC, CUSC, Grid Code Panels and REC Code Manager (subject to the REC Change Panel's ability to overrule their determination under defined circumstances) can determine the priority of a modification proposal based on its complexity, importance and urgency. The STC Panel and SEC change sub-committee can also determine the priority of each modification proposal, but the codes do not set out prioritisation criteria to be applied. The Distribution Code also allows the Panel to prioritise standard work as either 'Essential', 'Desirable', or 'Optional'.

<sup>3</sup> [Annex-A-Decision-Proposed-legal-drafting-code-modification-prioritisation.pdf](#)

<sup>4</sup> [Annex-B-Decision-Proposed-Prioritisation-Guidance.pdf](#)

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publication also contained a decision to take forward the prioritisation policy proposals to statutory consultation, pursuant to schedule 12 to the Act.

1.10 After we published our [August 2025 decision](#), we hosted a session with code administrators to discuss proposed future policy implementation. In this session we provided a summary of that decision and discussed the potential process, timelines needed, and roles of stakeholder relating to any proposed future policy implementation. This helped us build out our policy proposals relating to implementation in advance of the [November 2025 statutory consultation](#).

## November 2025 statutory consultation

1.11 In our [November 2025 Consultation on modifications to industry codes to implement the harmonised code modification prioritisation process](#),<sup>5</sup> we consulted on the entirety of the proposed policy, as well as the draft guidance document and code text changes. We proposed some minor changes to the policy, guidance, and legal text since the [August 2025 decision](#). These were highlighted within the relevant policy sections and annexes.

1.12 We split the policy proposals into four areas as part of the consultation:

1. Prioritisation process
2. Prioritisation criteria and categories
3. Prioritisation governance
4. Policy implementation

1.13 We sought feedback on these policy areas through questions 1-4 in the statutory consultation. We also sought feedback on:

- having a 28-day policy implementation window
- the proposed guidance document
- the proposed code text changes made to facilitate policy implementation.

## This decision

1.14 We have decided to proceed with the implementation of this harmonised code modification prioritisation process using our transitional powers under schedule 12 to the Act.

1.15 This document summarises the feedback we received on the policy areas, code text, and guidance document consulted on in [November 2025](#). We carefully

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<sup>5</sup> [Establishing a harmonised prioritisation process in the Industry Codes: statutory consultation | Ofgem](#)

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considered that feedback and we have set out our decisions alongside our rationale.

1.16 Alongside this decision, we have also published: (i) a modification decision notice; (ii) the related code modification text; and (iii) the accompanying finalised guidance.

1.17 We received and analysed 28 responses to our consultation and have published all non-confidential responses on our website.

## Policy areas

1.18 We have structured this decision to cover the following sections and their relevant decisions:

### Section 2. Prioritisation process

1.19 This section covers our decisions on:

- The role of the proposer of the modification in its prioritisation
- The role of the code panel<sup>6</sup> in prioritisation determinations
- Applying prioritisation to different types of modification proposals, such as alternative modifications, cross-code modifications and amalgamated modifications.
- How urgent and fast track self-governance modifications are to be considered outside of the scope of prioritisation

### Section 3. Prioritisation criteria and categories

1.20 In this section, we detail our decisions on definitions of the prioritisation criteria and categories and how they should be applied to prioritisation determinations. This section largely refers to the content published in ‘Annex A: Finalised Authority guidance on code modification prioritisation’. It covers our decisions on:

- Definitions of the prioritisation criteria and categories
- How to interpret the prioritisation criteria
- Applying the prioritisation criteria to the prioritisation categories
- How prioritisation affects modifications’ timelines.

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<sup>6</sup> We propose for the prioritisation process to align as far as possible across all codes but recognise there may be a need to reflect code specific operational requirements. For example, we recognise the unique roles and responsibilities around prioritisation in the SEC and REC, where the SEC change sub-committee and the REC code manager (subject to the REC Change Panel’s ability to overrule their determination under defined circumstances) determine prioritisation. Although we refer to code panels, we propose for this to apply to these symmetrical parties in the REC and SEC.

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## Section 4. Prioritisation governance

1.21 This section covers our decisions on:

- How the prioritisation review process works, its frequency, and how it interacts with other elements of the policy
- How we have considered having prioritisation appeals processes, and in what form these will exist at ‘go live’
- Recording prioritisation outcomes in registers and reports.

## Section 5. Policy implementation

1.22 Additionally, we have made decisions on how the new policy will be implemented and how it will interact with existing prioritisation processes. This section covers our decisions on:

- How to apply the prioritisation process to modifications submitted before ‘go live’
- Whether modifications need to be resubmitted to be prioritised accurately under the new process.

## Section 6. Guidance

1.23 We have decided to proceed with our proposal to publish guidance to support code panels in making consistent prioritisation determinations. We have published the finalised guidance alongside this decision and can be found in annex A. We have made some changes and additions to this guidance as a result of feedback received in the [November 2025 consultation](#). This section covers our decision on the guidance. The guidance will be kept under review and may be updated from time to time subject to the Authority’s discretion.

## Section 7. Code text

1.24 We have decided to implement the code modifications for each of the codes consulted upon, subject to some changes and additions as a result of feedback received in the [November 2025 consultation](#). The final text is set out in annexes B-L. These changes to the codes will take effect from 29 May 2026.

## Implementation and next steps

1.25 We are exercising our powers under schedule 12 to the Act to implement the changes set out in this decision. These powers allow us to modify qualifying

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documents,<sup>7</sup> for the purposes specified under paragraph 2 of schedule 12. We consider it appropriate to exercise these powers for the following purposes:

- Schedule 12, 2(1)(a) – for the purposes of or in connection with establishing the role of code manager in respect of a document which is expected to become a designated document. We consider this appropriate because this prioritisation process allows for prioritisation of modification proposals based on alignment with the SDS. This means that it can support prospective code managers in preparing for their roles by facilitating the progression of strategic changes aligned with the SDS; and
- Schedule 12, 2(1)(d) – for the purposes of promoting the efficient governance of arrangements under one or more qualifying documents. We consider this appropriate because implementing this harmonised prioritisation process will improve the efficiency of code governance arrangements through introducing consistent criteria and categories across codes, allowing code parties to focus on higher priority modifications, and improving the transparency of the prioritisation process.; and
- Schedule 12, 2(1)(e) – for the purposes of harmonising the governance of particular qualifying documents or of qualifying documents in general. We consider this appropriate because, through introducing a consistent prioritisation process across codes, we are harmonising the governance of qualifying documents.

1.26 We have decided to proceed with a 31-day implementation window rather than a 28-day window. This means that the new prioritisation process will take effect in all codes<sup>8</sup> from 29 May 2026. We have decided on 31 days in order to provide code parties with enough time to make relevant updates to the codes and prepare for operating the new process from that date. Further information on the implementation date is provided in the decision notice document, and further explanation of this decision is set out in section ‘5. Policy implementation’.

1.27 Our prioritisation policy, code text, and the guidance will apply to the current code governance framework before code managers are appointed. In our [second](#)

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<sup>7</sup> As per paragraph 1 of Schedule 12 to the Energy Act 2023, qualifying documents are those documents maintained in accordance with the conditions of a relevant licence which have also been designated by the Secretary of State as part of the [Designation Notice \(amended and consolidated\) under paragraphs 1\(1\)\(b\) and 1\(5\) of Schedule 12 to the Energy Act 2023 designating certain documents and central systems for the purposes of Schedule 12 to the Energy Act 2023](#)

<sup>8</sup> All codes refers to every code text and related document that has been designated as a ‘qualifying document’ by the Secretary of State as part of the [Designation Notice \(amended and consolidated\) under paragraphs 1\(1\)\(b\) and 1\(5\) of Schedule 12 to the Energy Act 2023 designating certain documents and central systems for the purposes of Schedule 12 to the Energy Act 2023](#)

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[implementation decision](#), published on 6 March 2026, we set out our intention to take forward our proposals on how this process would apply after code manager appointment. This process will be subject to future consultation and decision under schedule 12 to the Act.

## Structure of this document

- 1.28 We have split this document into sections based on the questions that we asked stakeholders in our [November 2025 consultation](#).
- 1.29 Code text changes have been included in summary tables in appendix 2 to show changes from the [November 2025 consultation](#). Where changes are consistent across codes or better explained narratively, we have used narrative rather than tables. Where changes to these tables have been made since our [November 2025 consultation](#), we have shown removals in struck through text and additions in red text
- 1.30 Appended to this document is:
- **Appendix 1 – Ancillary documents** sets out a list of which documents are in scope of our transitional powers.
  - **Appendix 2 – Legal drafting tables**, as explained above.
- 1.31 There are also a number of additional documents and annexes being published alongside this document:
- Notice of decision, setting out the code modifications we have decided to implement, in accordance with schedule 12 to the Act.
  - Annex A: Finalised Authority guidance on code modification prioritisation’ sets out guidance for code parties on the new harmonised prioritisation process. It aims to support consistent implementation across codes.
  - Modified code texts can be found in annexes B-L, with deletions shown in strike-through, and new text double underlined:
    - Annex B: Legal drafting of code modification prioritisation procedure – Balancing and Settlement Code (BSC).
    - Annex C: Legal drafting of code modification prioritisation procedure – Connection and Use of System Code (CUSC).
    - Annex D: Legal drafting of code modification prioritisation procedure – Distribution Code (D-Code).
    - Annex E: Legal drafting of code modification prioritisation procedure – Distribution Connection and Use of System Agreement (DCUSA).

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- Annex F: Legal drafting of code modification prioritisation procedure – Grid Code.
- Annex G: Legal drafting of code modification prioritisation procedure – Independent Gas Transporters’ Uniform Network Code (IGT UNC).
- Annex H: Legal drafting of code modification prioritisation procedure – Retail Energy Code (REC).
- Annex I: Legal drafting of code modification prioritisation procedure – Smart Energy Code (SEC).
- Annex J: Legal drafting of code modification prioritisation procedure – Security and Quality of Supply Standard (SQSS).
- Annex K: Legal drafting of code modification prioritisation procedure – System Operator Transmission Owner Code (STC).
- Annex L: Legal drafting of code modification prioritisation procedure – Uniform Network Code (UNC)

## Related publications

1.32 The key documents of relevance to this consultation are:

- [Energy Act 2023](#)
- [Energy code reform: implementation consultation | Ofgem](#) – January 2024
- [Implementation of energy code reform: decision | Ofgem](#) – August 2024
- [Consultation on the preliminary Strategic Direction Statement and governance arrangements for industry codes | Ofgem](#) – January 2025
- [Decision on the preliminary Strategic Direction Statement and governance arrangements for industry codes | Ofgem](#) – August 2025
- [Establishing a harmonised prioritisation process in the Industry Codes: statutory consultation | Ofgem](#) - November 2025

Table 1 – Policy Stages 1-3

<b>Stage 1 (Complete)</b>	<b>Stage 2 (Complete)</b>	<b>Stage 3 (Complete)</b>
<a href="#">Energy code reform: implementation consultation   Ofgem</a>	<a href="#">Implementation of energy code reform: decision   Ofgem</a>	<a href="#">Consultation on the preliminary Strategic Direction Statement and governance arrangements for industry codes   Ofgem</a>
January 2024	August 2024	January 2025

Table 2 – Policy Stages 4-7

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<b>Stage 4 (Complete)</b>	<b>Stage 5 (Complete)</b>	<b>Stage 6 (Current)</b>	<b>Stage 7</b>
<a href="#">SDS and Governance Arrangements Decision</a>	<a href="#">Prioritisation Statutory Consultation</a>	Prioritisation Statutory Decision	Prioritisation Policy Implementation
August 2025	November 2025	April 2026	May 2026

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## 2. Prioritisation process

### Background

2.1 At present, the codes do not apply consistent methodologies, categories or criteria for prioritising modifications or for publishing their prioritisation determinations. In our [November 2025 consultation](#), we proposed a consistent prioritisation approach to support more effective cross-code change, improve the efficiency of code governance arrangements and help code parties engage with the SDS and prepare for the appointment of code managers.

### Consultation position

2.2 In the [November 2025 consultation](#) we proposed:

- that the code modification proposer must provide an assessment of their proposal against the prioritisation criteria.<sup>9</sup>
- to insert a requirement for code panels<sup>10</sup> to undertake an assessment of non-urgent modification proposals, against the prioritisation criteria, giving due regard to the proposers' assessments as described above, to determine their prioritisation categories.<sup>11</sup>
- that the prioritisation process should apply to all types of modification proposals that have been determined not to be urgent modification proposals.
- where modification proposals are amalgamated,<sup>12</sup> to include in the code text the requirement for code panels to evaluate the various prioritisation categories and assessments of the amalgamated modification proposal to determine a singular prioritisation category for the modification going forward.<sup>13</sup>
- That modification proposals that impact multiple codes would follow the relevant procedures established in each code, with relevant direction provided by the 'Cross Code Steering Group' (CCSG).<sup>14</sup>

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<sup>9</sup> More details on relevant legal text changes can be found in Appendix 1, Table 4.

<sup>10</sup> And the SEC Change Sub-committee and the REC Code Manager (subject to the REC Change Panel's ability to overrule their determination under defined circumstances) for these codes.

<sup>11</sup> More details on relevant legal text changes can be found in Appendix 1, Table 5.

<sup>12</sup> This is relevant for the BSC, CUSC, Grid Code, SQSS, and the STC.

<sup>13</sup> More details on relevant legal text changes can be found in Appendix 1, Table 6.

<sup>14</sup> [CCSG Terms of Reference](#).

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## Summary of responses

Q1. Do you agree with the policy and associated code modifications proposed in Section 1. Prioritisation process?<sup>15 16</sup>

- 2.3 The majority of respondents either agreed or strongly agreed with the policy and associated code modifications proposed in this section. Several respondents said that the proposed approach would mean improved consistency and alignment across codes. One respondent noted that the process would support the transition from code administration to code management.
- 2.4 A couple of respondents said that the prioritisation process should also apply to urgent modifications, as well as non-urgent ones. They felt this would improve consistency in how modifications are treated, with one noting that considering urgent modifications outside of the prioritisation process could create an incentive for proposers to label their modifications as urgent to avoid the prioritisation process. Two respondents supported our proposal to exclude urgent modifications from the prioritisation process, with one highlighting that this is appropriate given the specific risks the urgency process is designed to address.
- 2.5 Some respondents commented on how the prioritisation process relates to fast track self governance (FTSG) modification proposals, with one requesting clarity on how they would be treated within the new prioritisation process. A few respondents suggested that FTSG modification proposals should not be subject to the prioritisation process to preserve the intended speed and simplicity of such modifications. Two respondents proposed that this exclusion should be formalised through a clause in the legal text, in the same way that urgent modifications have been.
- 2.6 A couple of respondents raised questions about alternative modifications, including requests for further clarity on how alternative modifications would be treated within the prioritisation process.

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<sup>15</sup> We are aware of issues with the numbering of sections 1-4 within questions 1-4 and apologise for any confusion caused by this error.

<sup>16</sup> The [response template document](#) published alongside the [November 2025 statutory consultation](#) allowed respondents to choose from a list of options to indicate whether they strongly agreed/agreed/disagreed/strongly disagreed/neither agreed nor disagreed/didn't have a view in relation to a question. Where respondents did not pick one of these options, but clearly indicated through their response their level of agreement in relation to a question, we manually allocated them to that response in our analysis. Where we felt that there was any doubt, however, we allocated such responses to 'no agreement/disagreement provided'. In any case, we appropriately considered any qualitative feedback.

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- 2.7 A couple of respondents expressed concern about the differences in the proposed prioritisation processes across codes. For example, one highlighted the variation between the REC and SEC processes as insufficiently justified, while another argued that maintaining differences runs counter to the objectives of energy code reform. Conversely, one stakeholder specifically supported the proposal for the current REC code manager to undertake prioritisation within the REC.
- 2.8 Finally, two respondents shared concerns around the requirement to prioritise code modifications relative to one another. One stakeholder felt that this could be challenging for proposers, while another requested further guidance to support greater consistency in how prioritisation judgements are made.

## Decision

- 2.9 We have decided to proceed with the proposed prioritisation process as detailed in the [November 2025 consultation](#), in relation to the role of proposers, code panels, and how the different types of modifications are treated. However, we have decided to explicitly remove FTSG modifications from the prioritisation process in those codes that have an FTSG, or equivalent, process.<sup>17</sup>

## Rationale for decision

- 2.10 We have decided to exclude FTSG modifications from the prioritisation process in those codes that have an FTSG modification process.<sup>18</sup> As highlighted in consultation responses, FTSG modifications are designed to address housekeeping or administrative changes in a fast and simple manner. Subjecting them to prioritisation would risk introducing delays to both their own implementation and the prioritisation of other modifications. This change is reflected in the relevant codes' legal texts and the finalised guidance document published in annex A.
- 2.11 We have also decided to keep the urgency process separate from the prioritisation process. In our view, the urgency process serves a different purpose and is designed to address imminent or ongoing issues that require immediate

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<sup>17</sup> This applies to all of the codes in scope of these changes excluding the Distribution Code, DCUSA, and SQSS. In the REC these types of administrative changes are referred to as 'Housekeeping Change Proposals' and have been included as such. In the CUSC these types of changes are referred to as CUSC Modification Fast Track Proposals and have been included as such.

<sup>18</sup> This applies to all of the codes in scope of these changes excluding the Distribution Code, DCUSA, and SQSS. In the REC these types of administrative changes are referred to as 'Housekeeping Change Proposals' and have been included as such. In the CUSC these types of changes are referred to as CUSC Modification Fast Track Proposals and have been included as such.

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attention.<sup>19</sup> Maintaining a separate urgency process ensures that urgent issues can be resolved quickly without needing to be prioritised.

- 2.12 Regarding alternative modifications, we have decided that all non-urgent, non-FTSG modification proposals should be taken through the prioritisation process. Alternative modifications will therefore be subject to the same prioritisation process, and where an alternative proposal is accepted, its prioritisation category will become the effective category for the modification.
- 2.13 We acknowledge stakeholder concerns around differences in the new prioritisation processes across codes. In particular there is concern that within the REC and SEC, the current REC code manager<sup>20</sup> and SEC change sub-committee, respectively, are responsible for determining modification priorities. This differs from other existing code modification prioritisation processes, where the code panels have this responsibility. While our intention has been to harmonise the code modification prioritisation processes where possible, we have decided to ensure that the process reflects specific operational arrangements of the codes. Amending these arrangements at this stage would be unnecessary, particularly in light of the upcoming proposed energy code reform governance changes. Additionally, keeping continuity with existing code arrangements and prioritisation decision-making bodies should also help to facilitate more accurate prioritisation determinations. We have therefore decided to implement this aspect of the policy as proposed in the [November 2025 consultation](#).
- 2.14 In response to stakeholders' concerns about proposers being required to undertake relative prioritisation of modifications, we have decided that this responsibility should rest with code panels rather than modification proposers. We consider the guidance to provide sufficient direction to support consistent decision-making while avoiding overly prescriptive requirements, given the code panels' expertise.

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<sup>19</sup> As per Ofgem's [Code Modification Urgency Criteria](#)

<sup>20</sup> Subject to the REC Change Panel's ability to overrule their determination under defined circumstances.

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### 3. Prioritisation criteria and categories

#### Background

3.1 Following a review of existing prioritisation processes, stakeholder feedback, and the introduction of an SDS-related criterion, we developed a proposed set of prioritisation criteria and categories to support consistent and transparent prioritisation decisions across codes. We set out these proposed definitions, along with the accompanying guidance in our [November 2025 consultation](#).

#### Consultation position

3.2 In the [November 2025 consultation](#), we published ‘Annex A: Proposed Authority guidance on code modification prioritisation’, and within this proposed:

- The definitions of the prioritisation criteria and categories to be used when code panels make prioritisation assessments
- That the prioritisation criteria should be equally weighted when used to make prioritisation determinations
- Changes to the legal text documents to introduce the prioritisation criteria and categories
- Guidance on how to interpret and apply the prioritisation criteria and categories
- The effect of the prioritisation category accorded to a modification, on that modification’s progression

#### Summary of responses

Q2. Do you agree with the policy and associated code modifications proposed in Section 2. Prioritisation criteria and governance?
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3.3 Half of respondents agreed or strongly agreed with the policy and associated code modifications proposed in section 2 and only two respondents indicated disagreement with this section. A few respondents provided answers that couldn’t be attributed to a level of agreement/disagreement. This means that a majority of respondents, who indicated a clear level of agreement or disagreement, agreed with the policy and related modifications in this section.

3.4 One respondent explicitly supported our view that the codes currently lack consistency in how they prioritise modifications. A few respondents welcomed the proposed binary classification of non-urgent modifications into either high or

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standard priority, noting its simplicity. A few respondents also expressed support for the proposed prioritisation criteria, considering them appropriate and well-targeted.

- 3.5 However, some respondents felt that the criteria presented were too subjective and risked being interpreted inconsistently across prioritisation decisions. A few specifically highlighted the complexity criterion as insufficiently clear or well-defined. In addition, one respondent expressed concern that limiting non-urgent modifications to two priority categories, while also applying three criteria, might reduce the code panels' ability to meaningfully differentiate between proposals.
- 3.6 A few respondents raised concerns that non-SDS related modification proposals might receive less attention under the new process. One stakeholder suggested this could particularly disadvantage market entrants and smaller parties whose proposals may have less direct alignment with the SDS.
- 3.7 Some respondents also questioned whether the prioritisation criteria should carry equal weight.
- 3.8 One suggested referring to 'equal consideration' rather than 'equal weighting', while others argued that certain criteria may inherently be more significant than others.
- 3.9 Finally, a few respondents suggested that Ofgem undertake some form of oversight or monitoring following implementation to review how the policy is operating in practice and assess whether it is meeting its intended goals.

**Decision**

- 3.10 We have decided to proceed with the policy and associated code modifications as outlined in the section on prioritisation criteria and governance.

**Rationale for decision**

- 3.11 We have decided to proceed with our proposals. We consider that the criteria and categories, supported by guidance, provide an appropriate and consistent basis for prioritisation decisions across codes.
- 3.12 The guidance offers additional detail on how the criteria and categories should be applied, helping panels to make determinations in a consistent and repeatable manner. We also consider that code panels have the experience and expertise needed to apply the framework effectively, and that being overly prescriptive would limit their ability to reflect the operational realities of their respective codes. For these reasons, we do not agree that the criteria are too vague. We

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consider that, when read alongside the guidance, the criteria strike the right balance between clarity and flexibility.

- 3.13 We have introduced the bi-annual and ad hoc review processes to ensure that prioritisation determinations can be re-considered when circumstances change. These reviews will help maintain consistency across determinations and allow any anomalous determinations to be identified and corrected.
- 3.14 We also consider the criteria of alignment with the SDS, importance, and complexity to be the most suitable for assessing the priority of modifications, without adding unnecessary complexity to the process. On the question of weighting, we have decided to implement our proposal for the criteria to be equally weighted. We confirm that we have not introduced any requirement for panels to apply quantitative scoring or matrices, rather each panel should consider each criterion with equal importance when determining priority. We therefore consider ‘weighting’ to be the appropriate term to describe the relationship between the criteria.
- 3.15 It remains our view that equal weighting will help ensure that the process is fair and balanced across a diverse set of code parties and modification types. While the SDS is a key strategic driver for industry change, and this is reflected within the prioritisation criteria, it is only one of three equally weighted considerations. We recognise that modifications not directly linked to the SDS will still be important for ensuring the efficient operation of the codes. The inclusion of the importance and complexity criteria will ensure these modifications can continue to progress appropriately. We therefore do not consider that this process will exclude code parties from submitting modifications or having their modifications considered fairly.
- 3.16 We consider that the prioritisation categories of standard and high are appropriate and that introducing an additional ‘low’ category is unnecessary. A low priority category could risk unduly delaying some modifications. We are also of the view that having three criteria and two categories, as well as requiring modifications to be prioritised relatively to one another within these categories, allows modifications to be sufficiently differentiated, without adding undue complexity or creating additional process-driven delays.
- 3.17 We have not introduced any specific mechanism for monitoring the effectiveness of the prioritisation process post-implementation. The bi-annual and ad hoc reviews processes already provide a built-in mechanism for reviewing and updating prioritisation decisions. In addition, we consider Ofgem’s existing engagement channels, such as regular panel engagement, to be sufficient for monitoring and reviewing the policy. Introducing a formal monitoring framework
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would impose unnecessary administrative burden on both code parties and Ofgem.

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## 4. Prioritisation reporting and governance

### Background

- 4.1 We aimed to develop a prioritisation reporting and governance system that would maximise transparency and stakeholder engagement, building on current practices to maximise alignment with existing code procedures and enable a smooth transition to the new framework.
- 4.2 We had initially proposed to introduce a quarterly review of the prioritisation category of modification proposals. However, in response to stakeholder feedback and further policy development, we proposed a bi-annual review, together with ad hoc reviews.
- 4.3 The prioritisation reporting and governance framework includes requirements on how prioritisation decisions should be published in relevant registers and reports. The framework does not introduce a new appeals process but retains existing procedures for appealing or overturning the priority of a modification.

### Consultation position

#### Prioritisation review processes

##### Bi-annual modification review process

- 4.4 In the [November 2025 consultation](#), we proposed:
- To introduce a requirement for code panels to review the prioritisation category of modification proposals on a bi-annual basis.<sup>21</sup>
  - To include in ‘Annex A: Proposed Authority guidance on code modification prioritisation’ the expectation for code panels to undertake ad hoc reviews of the prioritisation category of modification proposals, when triggered to do so.
  - Not to introduce a new appeals process specifically for prioritisation category determinations.
  - That existing appeal processes and routes for overturning prioritisation determinations should remain and, where necessary, be updated to refer to the correct terms used in the new prioritisation process, such as the ‘Prioritisation Category’ rather than the ‘priority’ of a proposed modification.
  - To require relevant parties to publish prioritisation determinations within modification registers and relevant reports to promote transparency in the prioritisation process.

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<sup>21</sup> More details on relevant legal text changes can be found in Appendix 1, Table 7.

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- To amend code texts to include a requirement for code modification registers to include details of the panel’s determination on the prioritisation category of a code modification proposal.
- To introduce a requirement for code modification registers to include whether a modification proposal has been determined to be urgent or not, where this doesn’t already exist.<sup>22 23</sup>
- For any changes to prioritisation determinations to be reflected in modification registers.<sup>24</sup>
- For modification registers to detail whether the modification proposal is a cross-code modification proposal or not.
- Where codes require publication of progress reports and modification-specific reports,<sup>25</sup> to introduce into the code texts an additional requirement for these reports to include details of the panel’s determination on the prioritisation category of the modification proposals.

## Summary of responses

**Q3.** Do you agree with the policy and associated code modifications proposed in Section 3. Prioritisation reporting and governance?

4.5 The majority of respondents stated that they agreed with the proposed policy and associated code modifications related to prioritisation reporting and governance. Some welcomed the bi-annual prioritisation review process accompanied by ad hoc reviews. Some respondents agreed that the proposed measures would contribute towards improved transparency.

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<sup>22</sup> This would only apply to the D-Code, IGT UNC, REC, SQSS, STC, and UNC as they don’t currently contain a codified requirement for code modification registers to include whether a modification has been determined to be urgent or not.

<sup>23</sup> More details on relevant legal text changes can be found in Appendix 1, Table 8.

<sup>24</sup> More details on relevant legal text changes can be found in Appendix 1, Table 8.

<sup>25</sup> This refers to the ‘Monthly Progress Report’ and the ‘Modification Report’ in the BSC; the ‘Change Report’ in the REC; the ‘Progress Report’, the ‘Authority Led CUSC Modification Report’, the ‘CUSC Modification Report’, and the ‘CUSC Modification Fast Track Report’ in the CUSC; the ‘Change Report’ in the DCUSA; the ‘Grid Code Modification Report’ in the Grid Code; the ‘STC Modification Report’ and the ‘Progress Report’ in the STC, the ‘Modification Report’ in the SEC, the ‘report’ detailed in paragraph 21(f) of the Constitution and Rules of the Distribution Code, the ‘report’ detailed in paragraph 21(n)(2) of the Constitution and Rules of the Distribution Code, and the ‘report’ detailed in paragraph 4.1(xi) of the Standards Procedures 1 section of the Constitution and Rules of the Distribution Code, the ‘Modification Report’ in the UNC, the ‘Draft Modification Report’ and ‘Final Modification Report’ in the IGT UNC, and the ‘Consultation Document’ and subsequent ‘Modification Report’ in the SQSS.

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- 4.6 A couple of respondents agreed with our proposal to maintain the current appeals process. One respondent commented that introducing a uniform appeals process across the codes could add unnecessary complexity.
- 4.7 A few respondents disagreed with our proposal regarding the appeals process. A few commented on the lack of a prioritisation appeals process, with one suggesting that an additional step to allow proposers to formally appeal code panel decisions should be introduced. One respondent expressed concern about the different appeals processes across the codes.
- 4.8 We received mixed views on the frequency of prioritisation reviews. A couple of respondents suggested increasing the frequency of reviews from bi-annual to quarterly. One respondent stated that bi-annual reviews would be too infrequent and insufficient to keep up with the normal flow of modifications, and suggested that quarterly reviews would provide greater transparency in how prioritisation categories for modification proposals are reviewed.
- 4.9 Alternatively, some respondents argued that some or all of the proposed prioritisation review process was too frequent. One stakeholder highlighted the burden that such a frequency of reviews could have on code parties and another commented that the costs of having this review frequency could outweigh the benefits. Additionally, two respondents mentioned that frequent reprioritisation could disrupt delivery timelines and have significant resource implications.
- 4.10 One respondent requested clarification on how bi-annual and ad hoc review outcomes and the justifications for prioritisation decisions will be incorporated into the central register to maintain transparency.

**Decision**

- 4.11 We have decided to proceed with the policy and associated code modifications proposed in the [November 2025 consultation](#). However, we have amended the guidance to clarify how we expect the bi-annual and ad hoc review outcomes, and the justifications for prioritisation decisions, to be incorporated into the central modification register.

**Rationale for decision**

- 4.12 We have decided to proceed with our proposal to codify the requirement for code panels to undertake bi-annual prioritisation reviews, while also expecting them to undertake ad hoc prioritisation reviews at their discretion. We consider this approach provides an appropriate balance between supporting accuracy and consistency of prioritisation determinations while managing the resource
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implications associated with conducting these reviews and implementing resultant changes.

- 4.13 We have also decided to proceed with our proposal not to introduce a new appeals process for prioritisation within the codes. A few respondents supported this position, noting that existing governance and oversight mechanisms already provide sufficient scrutiny of decisions. In our view, because proposers will provide an initial prioritisation assessment, and the review process will add an additional layer of governance, a new appeals process would offer limited additional value. It would also risk introducing delays that could undermine the objectives of the prioritisation policy.<sup>26</sup>
- 4.14 We have decided not to amend existing appeals processes within the codes where they relate to prioritisation. While harmonisation remains a key aim, it is important that the arrangements reflect unique procedures within the codes and retain governance processes introduced outside the scope of this policy. We acknowledge concerns about potential inconsistencies created by this but consider this approach to be the most proportionate. Removing existing governance processes and adding a new appeal process could create unintended consequences and introduce unnecessary delays.
- 4.15 We agree that greater clarity around the central modification register would support code parties and enhance transparency. Accordingly, we have added to the guidance our expectation that the central modification register should include all information relating to prioritisation, as published in the individual codes' registers. We consider this an important step in maximising transparency around the prioritisation process.

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<sup>26</sup> That it would promote efficient governance of code arrangements, as well as supporting industry's ability to dedicate time and resource to focus on higher priority modifications and help facilitate efficient cross-code change

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## 5. Policy implementation

The following sections provide our response to questions 4 and 5. They have been included together in this section due to their relevance to policy implementation.

### Policy Implementation

#### Background

- 5.1 We have created an implementation approach to the new prioritisation process that aims to maximise the benefits of harmonising code modification prioritisation ahead of code manager appointments, while also minimising disruption to industry.
- 5.2 In our [August 2025 decision](#), we said that we proposed to define what we would consider a live modification to be, and to introduce the new prioritisation process to all live modifications that exist at the date that the proposed code changes take effect, as well as newly proposed modifications from this date onwards.

#### Consultation position

##### Defining live modifications proposals

- 5.3 In the [November 2025 consultation](#), we proposed:
- To introduce the new prioritisation process to all live modification proposals<sup>27</sup> that exist at the date that the proposed code changes take effect,<sup>28</sup> as well as newly proposed modifications from that date onwards.
  - That modifications that are sent back for further work should be reprioritised under the new process to guide their continued progression.
  - That code panels are best placed to determine which live modification proposals contain sufficient information to allow a prioritisation determination to be made, and which may need to be resubmitted to enable a proper assessment under the new process.
  - That code panels would be expected to undertake sufficient engagement with proposers if the progression of their modification proposals might be impacted by the need to reassess it under the new prioritisation process.

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<sup>27</sup> We also proposed a definition of what a live modification proposal would be

<sup>28</sup> Modifications that were, therefore, submitted before the proposed code changes take effect.

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- That applying the new prioritisation assessment would not affect a live modification proposal's stage in the process, only the timelines for its progression from that point onwards.
- That code panels would be expected to undertake the process of reviewing and prioritising live modification proposals in a timely manner after policy implementation.

## Summary of responses

Q4. Do you agree with the policy and associated code modifications proposed in Section 4. Policy implementation?

- 5.4 The majority of respondents agreed with the policy and associated code modifications proposed in section 4 policy implementation. A couple of respondents supported our definition of a live modification for the purposes of prioritisation.
- 5.5 However, a few respondents raised concerns about the potential negative impact of applying the prioritisation process to live modifications. One respondent anticipated a significant impact on code panels, who would be required to reassess both live and future modifications to determine their prioritisation category, and highlighted potential resource implications for code parties. Another respondent suggested that applying the process to live modifications could introduce delays to modification progression and noted the potential costs implications of such delays.
- 5.6 One stakeholder commented that the proposed approach did not explicitly address send-back modification proposals. They recommended that such proposals be treated as outside the new prioritisation process unless and until the relevant code panel determines they should be included.
- 5.7 Finally, one stakeholder suggested that code panels should have discretion to exempt certain modification proposals nearing completion from being re-prioritised to avoid unnecessary delays.

## Decision

- 5.8 We have decided to proceed with the policy and associated code modifications proposed in the section on policy implementation.

## Rationale for decision

- 5.9 We have decided to proceed to implement the policy as proposed to ensure a consistent approach to policy modifications benefitting from the new process. As
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we have explained above, this proposal received strong stakeholder support. Ensuring that all live and newly proposed modifications are prioritised under the new process will allow panels to accurately compare and prioritise modifications. This should prevent risks and potential delays arising from prioritising modifications using different prioritisation processes. We acknowledge the resource impact of requiring all live modifications, as well as newly proposed modifications post-implementation, to be prioritised under the new process, however we expect that the code panels' existing expertise and familiarity with live modifications will help minimise the resource implications of re-prioritisation, where it needs to take place.

- 5.10 In addition, the guidance sets out the expectation that the review and prioritisation of live modifications should be completed in a timely manner, rather than setting an explicit deadline for this. This means that panels and administrators will be in a position to develop a plan to complete this review which should help mitigate some of the time pressures on industry as they adapt to the new process.
- 5.11 We recognise stakeholder concerns that applying the new process to live modifications could introduce delays, particularly for proposals nearing completion. To address this, we have drafted the definition of live modification so that, in certain circumstances, modifications close to completion may not need to be prioritised under the new system. Furthermore, the prioritisation determination will not alter the stage a modification has already reached, it will affect only future timelines. We also expect the expertise of code panels will ensure live modifications are not subject to unnecessary delays when being assigned a prioritisation category. Taken together, these measures provide appropriate safeguards, and we therefore do not consider it necessary to allow exemptions from the re-prioritisation requirement.
- 5.12 Where modification proposals are raised before the new process takes effect and are not considered live at the policy's effective date, for example, because they are at the Authority decision stage, we expect that they must be re-prioritised if they are subsequently sent back for further work. This approach can help ensure that only one prioritisation process operates at any given time.

## Policy implementation date

### Background

- 5.13 After we published our [August 2025 decision](#) publication, we hosted a session with code administrators to discuss proposed future policy implementation. In
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this session we provided a summary of the [August 2025 decision](#) publication and discussed the potential process, timelines needed, and roles of stakeholder relating to any proposed future policy implementation. This helped us build out our policy proposals relating to implementation in advance of the [November 2025 statutory consultation](#).

## Consultation position

5.14 In the [November 2025 consultation](#) we proposed that the changes consulted on, subject to the outcome of the consultation, would come into effect for the relevant codes on the effective date of 28 days from the publication of the related prioritisation policy decision notice. We said that we thought that this provided time for implementation, following the consultation period and proposed decision.

## Summary of responses

Q5. Do you agree with our proposed implementation date of 28 days from the publication of the related prioritisation policy decision notice?
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5.15 Half of respondents agreed with our proposed implementation date of 28 days from the publication of the prioritisation policy decision notice.

5.16 One respondent cited the extended consultation process as a reason why this 28-day implementation window seemed reasonable. A couple of respondents also agreed that this implementation window was appropriate, assuming that there were no significant changes to policy from the consultation to the decision publication.

5.17 A couple of respondents requested clarity on whether this 28-day implementation window meant that all live modifications needed to be re-assessed within this period. Another stakeholder stated their assumption that this re-prioritisation could be undertaken post policy-implementation.

5.18 Some respondents stated that 28 days would be too short a period for policy implementation. Reasons for this included that it would create resourcing issues and that it may not allow for all monthly code panel meetings to have taken place in that period.

5.19 However, the majority of respondents who considered a 28-day implementation window to be too short based their concerns on the assumption that this gave them 28 days to re-prioritise all live modifications. This may have stemmed from misunderstanding about what was meant by ‘implementation’ in the consultation question.

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5.20 One respondent also flagged that changes will need to be made to various subsidiary documents in order to facilitate policy implementation.

## **Decision**

5.21 We have decided to make a minor adjustment to the proposed policy implementation window from 28 days to 31 days. We have amended the guidance to explain that what is required during this period is for each of the codes to be updated with the relevant changes to reflect the new prioritisation process. We are not requiring all live modification proposals to have been assigned a prioritisation category within 31 days.

## **Rationale for decision**

5.22 This policy change will ensure that all monthly code panel meetings have an opportunity to discuss the new process before it goes live. Under a 28-day window, some panel meetings in the monthly cycle might have fallen outside the window. Extending the period to 31 days is a minor change that removes that risk.

5.23 This additional time will support panels in familiarising themselves with the new process and preparing to apply it effectively once the implementation window ends. We consider that there have not been significant policy changes between the consultation and decision stage that would justify an implementation period longer than 31 days.

5.24 We have also added clarification to the guidance explaining that the implementation date refers to when the code modifications take effect, so when the new process goes live, and not a deadline by which all live modifications must have been assigned a prioritisation category. We expect that categorisation to be completed in a timely manner, as set out in the guidance. This means that panels and administrators can develop a plan to complete this review and should help mitigate some of the time pressures on industry as they adapt to the new process.

5.25 In annexes B-L we have included the amendments to the code text required to implement the new prioritisation process. We expect code administrators to update any related subsidiary documents, such as proposal submission forms, as part of their preparations for go-live during the 31-day period following publication of this decision.

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## 6. Guidance

### Background

6.1 In our [January 2025 consultation](#), we published Annex B: Definitions to form future guidance on code modification prioritisation, which set out just proposed definitions of prioritisation criteria and prioritisation category. Following this, in our [August 2025 decision](#), we developed a more detailed proposed guidance document that would support code panels in making consistent and accurate prioritisation decisions.

### Consultation position

6.2 In our [November 2025 statutory consultation](#) we published [Annex A: Proposed Authority guidance on code modification prioritisation](#), which was a revised version of the guidance document published in August 2025.

### Summary of responses

Q6. Do you agree with the proposed guidance in ‘Annex A: Proposed Authority guidance on code modification prioritisation’?
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6.3 The majority of respondents agreed with the proposed guidance in ‘Annex A: Proposed Authority guidance on code modification prioritisation’. One respondent stated that the guidance would help to support consistent prioritisation decision-making, and another emphasised that it would help code parties to apply the priority categories.

6.4 A few respondents commented on where the guidance should sit within codes’ governance structures. One suggested adding the guidance as a related document within each code, and a couple of respondents questioned how changes would be made to the guidance in future.

6.5 We also received suggestions to include additional content within the guidance. One stakeholder suggested amending the guidance covering what could trigger an ad hoc review. A couple of respondents also requested that we make it clearer in the guidance that the high prioritisation category should be treated as an exception. One respondent also requested clarity around how prioritisation would work within operational aspects of the modification process, such as workgroups.

### Decision

6.6 We have decided to proceed with the proposed guidance set out in ‘Annex A: Proposed Authority guidance on code modification prioritisation’, amended to

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take into account feedback from the consultation as explained below. We have also added further detail on how the guidance may be updated in the future.

## Rationale for decision

- 6.7 We do not consider that any significant additions or changes are required to the guidance document, beyond changes to reflect other decisions set out in this document. We consider the guidance strikes the right balance between providing sufficient support to code panels when making prioritisation determinations and avoiding an overly prescriptive approach that could introduce unnecessary complexity or limit panels' ability to reflect the specific needs of their individual codes and operations.
- 6.8 We consider that the guidance already provides adequate clarity on the distinction between high and standard priority modifications, including how these categories relate to standard and non-standard timelines. We also consider that adding further factors for ad hoc reviews would be unnecessarily prescriptive and therefore have not made any changes in this area.
- 6.9 We recognise the importance of explaining how the guidance may be updated in the future. We have therefore added a paragraph to the guidance setting out how we may review and revise the guidance as needed. We have also included contact details for stakeholders who may have concerns or require clarification. We do not agree with the suggestion to maintain separate guidance documents for each code. This is because the guidance is aimed at facilitating cross-code consistency where possible. Creating code-specific guidance documents would run counter to that. We have therefore decided to follow the precedent of the [Ofgem Guidance on Code Modification Urgency Criteria](#)<sup>29</sup> and use a central, Ofgem-led guidance document.

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<sup>29</sup> [Ofgem Guidance on Code Modification Urgency Criteria | Ofgem](#)

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## 7. Code text drafting

### Background

7.1 In the [January 2025 consultation](#) we published our initial proposals on code text drafting that would facilitate the new proposed prioritisation process.<sup>30</sup> We then considered stakeholder feedback and ongoing policy development to produce updated proposed code text drafting<sup>31</sup> in the [August 2025 decision](#) publication.

### Consultation position

7.2 In the [November 2025 consultation](#) we consulted on a revised version of the proposed code text, which we published in annexes B-L.

### Summary of responses

Q7. Do you agree with the proposed code text drafting published in annexes B-L?
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- 7.3 Many stakeholders agreed with the proposed code text drafting in annexes B-L. Excluding answers that could not be attributed to a category, just over half of respondents agreed. Only two stakeholders disagreed with the proposed code text drafting.
- 7.4 One respondent suggested that the BSCP40 be updated to facilitate the introduction of the new prioritisation process. Another respondent stated their assumption that the Alt HAN forum will be invited to provide their views on the prioritisation of modifications that affect Section Z in the SEC.
- 7.5 One respondent questioned whether a modification should be re-prioritised when amended or changed.
- 7.6 Some respondents provided specific comments on sections of the legal text. One respondent suggested changes specific to the BSC to simplify how it refers to prioritisation only applying to non-urgent modifications.
- 7.7 A few respondents stated that, within the UNC, specific obligations cannot be placed on the panel. Instead, an obligation should be placed on the code administrator to request the panel to undertake the relevant functions.
- 7.8 One respondent stated that the current drafting implies that amalgamated modifications cannot also be urgent modifications. One respondent stated the

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<sup>30</sup> [Subsidiary Document 3 Annex A Consultation Preliminary SDS.pdf](#)

<sup>31</sup> [Annex-A-Decision-Proposed-legal-drafting-code-modification-prioritisation.pdf](#)

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SQSS doesn't contain any urgency procedures, and that, therefore, our references to these procedures within the SQSS are incorrect.

## Decision

7.9 We have decided to proceed with the annexes B-L as consulted on, amended to reflect consultation feedback, policy changes, and external changes to the codes. These changes consist of:

- Specific text changes resulting from stakeholder feedback
- Excluding FTSG modifications from the prioritisation process
- Removing references to urgency in the SQSS and Distribution Code
- Changing the UNC and IGT UNC to reflect the role of the code administrator requesting the panel to carry out functions.

## Rationale for decision

7.10 We acknowledge stakeholder feedback around additional documents, such as the BSCP40, needing to be changed to facilitate the implementation of the new prioritisation. However, outside of the code text and relevant documents included in annexes B-L, we expect code administrators to identify and amend these additional documents as they see necessary to facilitate policy implementation.

7.11 We do not expect policy implementation to impact existing procedures where certain code parties provide their views on the code modification process. This may include views on prioritisation. We do not want to prescribe what code panels can seek input on when making their prioritisation decisions. However, we emphasise that prioritisation category decision-making powers sit with code panels.

7.12 We do not currently intend to introduce thresholds for re-prioritising modifications when amended, such as through the consultation process. Instead, we expect code panels to manage such cases as they see fit, using their expertise and experience. For example, where modifications differ significantly from their original scope, it might be appropriate for code panels to facilitate their re-prioritisation. The bi-annual and ad hoc review processes will also help to prevent modifications that have changed in scope from being prioritised incorrectly.

7.13 We have amended the UNC and IGT UNC to reflect the role of the code administrator in requesting the code panels to carry out functions. As there is no urgency process detailed in the SQSS and Distribution Code, we have removed references to urgent modifications in these codes.

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- 7.14 Additional amendments to the code text have been made in response to stakeholder feedback and to reflect changes to the codes since our initial consultation processes. For example, we checked that each code text was up to date as of 5 March 2026. For brevity we have not described these changes, but they can be found marked within the relevant annexes B-L.
- 7.15 We have also made some changes to the code text where we found that the phrasing, punctuation, or grammar of some code text modifications were not achieving their intended aims.
- 7.16 We made changes to the BSC to reflect the feedback we received around simplifying the code text modifications. This included adding caveats that urgent and FTSG modifications cannot have prioritisation categories. We applied this, where relevant, across the codes to improve clarity.
- 7.17 We recognise that the wording around amalgamated modifications had inadvertently changed what types of modifications could be amalgamated. We have updated the wording to ensure that this is not the case,

**Next Steps**

- 7.18 We have decided that these code modifications will be effective from 29 May 2026. Further details can be found in the decision notice document.

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## Appendix 1 – Ancillary documents

The table below lists documents which are within scope to change using our transitional powers under schedule 12 to the Act for day 1 implementation of this policy.

<b>Code</b>	<b>Documents/sections to be amended using transitional powers</b>
BSC	Sections F, X
CUSC	Sections 8, 11
D-Code	THE CONSTITUTION AND RULES OF THE DISTRIBUTION CODE REVIEW PANEL OF GREAT BRITAIN <sup>32</sup>
DCUSA	Section 1
Grid Code	Sections GD and GR
IGT UNC	Part L
REC	Schedules 1 and 5, REC Change Panel Terms of Reference <sup>33</sup>
SQSS	Section 11, Appendix J

<sup>32</sup> Standard condition 21.1 of the [Distribution Licence](#) places an obligation upon the licensee to ensure that the [Distribution Code](#) remains in force and its content meets various requirements, as set out further in the Distribution Licence. These requirements include, among other things, ensuring that the code make provision for the creation of a panel body and a code administrator, whose functions shall include facilitating the procedures for making a modification to the Distribution Code. Furthermore, standard conditions 21.8 to 21.11F (inclusive) set out requirements around the procedure for modifying the code. Paragraph DGC11.1 of the Distribution Code states that “Modifications to the Distribution Code shall be made in accordance with the procedures set out in the Constitution and Rules of the Distribution Code Review Panel”. Therefore, we have set out our proposed changes to the relevant paragraphs of the Constitution and Rules document.

<sup>33</sup> Standard condition 11B.1 of the Electricity Supply Licence (Electricity Supply Licence) and standard condition 11 of the Gas Supply Licence (Gas Supply Licence) place an obligation on licensees to be a party to, comply with and maintain the Retail Energy Code (REC), as set out further in the Electricity Supply Licence (Electricity Supply Licence) and the Gas Supply Licence (Gas Supply Licence). These obligations include, among other things that the code must provide for a code manager, whose powers, duties or functions shall facilitate the procedures for making a modification to the REC. Furthermore, standard conditions 11B.8 of the Electricity Supply Licence and standard condition 11.8 of the Gas Supply Licence set out requirements around the procedures for modifying the codes. Standard condition 11B.8 states that the REC must provide for a panel body to perform the role of code manager (the REC manager) who shall facilitate the procedures for making a modification to the REC. Paragraph 6.1 of the REC states that “The REC Board may establish such sub-committees from time to time...”. Paragraph 6.2 states that the Change Panel is a sub-committee, and that “Each Sub-Committee shall be subject to such written terms of reference and such procedures as the REC Board may determine” (paragraph 6.5). Therefore, we have set out our proposed changes to the relevant paragraphs of the Terms of Reference (Terms of Reference) document below.

**Decision** – Energy code reform programme – decision on modifications to implement a harmonised code modification prioritisation process

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SEC	Sections A and D, SEC Change Sub-Committee Terms of Reference (ToR) <sup>34</sup>
STC	Sections B, J
UNC	Modification Rules

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<sup>34</sup> Section D2.A of the Smart Energy Code establishes the Change Sub-Committee in accordance with it. Paragraphs C6.10-C6.12 of the Smart Energy Code (inclusive) detail that the Panel shall specify the terms of reference and procedural rules to be followed by the Sub-Committee. Therefore, we have included changes to the relevant paragraphs of the [SEC Change Sub-Committee Terms of Reference](#).

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## Appendix 2 – Legal drafting tables<sup>35</sup>

### A2. 1 Table 4

<b>Proposed code text change</b>	<b>References (not limited to)</b>
Insertion of “(m) an assessment by the Proposer of the Modification Proposal against the Prioritisation Criteria.”	<b>BSC: Section F, Paragraph 2.1.2</b>
Insertion of “(m) an assessment by the Proposer of the CUSC Modification Proposal against the Prioritisation Criteria.”	<b>CUSC: Section 8, Part C, Paragraph 8.16.4</b>
Insertion of “The consultation paper shall include an assessment by the proposer of the proposed modification against the Prioritisation Criteria.”	<b>The Constitution and Rules of The Distribution Code Review Panel of Great Britain: Paragraph 21(e)</b>
Insertion of “The proposer must also include an assessment of the proposed Annex 1 Standards and Annex 2 Standards modification against the Prioritisation Criteria”	<b>The Constitution and Rules of The Distribution Code Review Panel of Great Britain: Standard Procedure 1, Paragraph 4.1 (i)</b>
Insertion of “10.4.11 an assessment by the Proposer of the Change Proposal against the Prioritisation Criteria.”	<b>DCUSA: Section 1C, Paragraph 10.4</b>
Insertion of “(l) an assessment by the Proposer of the Grid Code Modification Proposal against the Prioritisation Criteria”	<b>Grid Code: Governance Rules, Part B, Paragraph GR.15.3</b>
Insertion of “(m) shall include an assessment by the Proposer of the Modification Proposal against the Prioritisation Criteria;”	<b>IGT UNC: Part L, Paragraph 10.2.1</b>

<sup>35</sup> Code text deletions are shown in strike-through, and new code text is double underlined. Text in red shows changes that we have made to the code text contained in the [November 2025 statutory consultation](#), which include changes to take into account stakeholder feedback to our consultation and changes to reflect the current published version of the D-Code, which was checked as of 5 March 2026. Where additional accessibility provisions are required, please contact [industrycodes@ofgem.gov.uk](mailto:industrycodes@ofgem.gov.uk).

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Proposed code text change	References (not limited to)
Insertion of “The Issue or Change Proposal must include an assessment by the Proposer of the issue or change against the Prioritisation Criteria, <del>and other information prescribed by the Code Manager,</del> ”	<b>REC: Schedule 5, Paragraph 7.2</b>
Insertion of “(k) an assessment by the Proposer of the Draft Proposal against the Prioritisation Criteria.”	<b>SEC: Section D, Paragraph D1.7</b>
Insertion of “J.5.2.1.2A A Modification Proposal made pursuant to sub-paragraph J.5.2.1.1 shall also contain an assessment the Proposer of the Modification Proposal against the Prioritisation Criteria.”	<b>SQSS: Appendix J, Paragraph J.5.2.1</b>
Insertion of “(k) an assessment by the Proposer of the STC Modification Proposal against the Prioritisation Criteria.”	<b>STC: Section B, Paragraph 7.2.2.2</b>
Insertion of “(t) shall include an assessment by the Proposer of the Modification Proposal against the Prioritisation Criteria.”	<b>UNC: Modification Rules, Paragraph 6.2.1</b>

## A2.2 Table 5

Proposed code text change	References (not limited to)
Insertion of “ <del>subject to</del> <b>and</b> taking into account the assessment made under paragraph 2.1.2(m), <del>and subject to the Panel having already determined that a Modification Proposal is not to be considered as an Urgent Modification Proposal,</del> the Prioritisation Category”, removal of term ‘priority’	<b>BSC: Section F, Paragraph 2.2.3 (c)(ii)</b>
Insertion of “(iv) <del>subject to</del> <b>taking</b> into account the assessment made under paragraph 2.1.2(m), <del>and, subject to the Panel having already determined that a</del>	<b>BSC: Section F, Paragraph 2.2.3 (d)</b>

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<b>Proposed code text change</b>	<b>References (not limited to)</b>
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~~Modification Proposal is not to be considered as an Urgent Modification Proposal;~~ the Prioritisation Category accorded to the Modification Proposal (as compared with other Pending Modification Proposals).”

Amend paragraph to say “~~Where Modification Proposals have been determined to not be Urgent Modification Proposals;~~ and ~~h~~Having regard to the Prioritisation Criteria, the Panel ~~may~~shall determine the Prioritisation Category of Modification Proposals and may(subject to paragraph 1.4.3) adjust the relevant modification timetable for each Modification Proposal accordingly.

**BSC: Section F, Paragraph 2.2.10**

Insertion of “(g) Subject to paragraph 8.3.3(b), and taking into account the assessment made by the Proposer under paragraph 8.16.4 (m), where the CUSC Modifications Panel has already determined a CUSC Modification Proposal to not be an Urgent CUSC Modification Proposal or a CUSC Modification Fast Track Proposal, the CUSC Modifications Panel shall decide the Prioritisation Category, as defined in paragraph 8.19(e), accorded to CUSC Modification Proposals through assessment against the Prioritisation Criteria (as compared with other Pending CUSC Modification Proposals).” (g) The CUSC Modifications Panel shall allocate a Prioritisation Category to every CUSC Modification Proposal, other than those that are treated as Urgent CUSC Modification Proposals or CUSC Modification Fast-Track Proposals. In determining the Prioritisation Category, the CUSC Modification Panel shall assess the relevant CUSC Modification Proposal against the Prioritisation Criteria and shall take into account (without limitation) the Prioritisation Categories awarded to other Pending CUSC Modification Proposals as well as the assessment made by the relevant Proposer under paragraph 8.16.4(m).”

**CUSC: Section 8, Part B, Paragraph 8.3.3**

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Proposed code text change	References (not limited to)
<p>Insertion of “8.18.9 <del>Unless</del><b>Where</b> a Modification Proposal has been determined to not be an Urgent CUSC Modification Proposal <del>or a CUSC Modification Fast Track Proposal</del>, the CUSC Modifications Panel shall evaluate each CUSC Modification Proposal against the Prioritisation Criteria to determine the relevant Prioritisation Category of the modification, taking into account the views of the Proposer as established in sub-paragraph 8.16.4 (m).”</p>	<p><b>CUSC: Section 8, Part C, Paragraph 8.18</b></p>
<p>Insertion of “The consultation paper shall also include the Panel’s assessment of the proposed modification against the Prioritisation Criteria, as compared with other proposed modifications, to determine the Prioritisation Category of the proposed modification; <del>where the proposed modification has been determined to not be an urgent modification</del>. This assessment by the <del>p</del>Panel must take into account any assessment made by the proposer of the proposed modification against the Prioritisation Criteria.</p>	<p><b>The Constitution and Rules of The Distribution Code Review Panel of Great Britain: Paragraph 21(e)</b></p>
<p>Insertion of “(5) <del>where the proposed modification has been determined to not be an urgent modification</del>; assess the proposed modification against the Prioritisation Criteria, as compared with other proposed modifications, and taking into account the assessment of the proposed modification against the Prioritisation Criteria by the proposer, to determine its Prioritisation Category;”</p>	<p><b>The Constitution and Rules of The Distribution Code Review Panel of Great Britain: Paragraph 21(i)</b></p>
<p>Insertion of “(4) <del>W</del><del>where the proposed modification has been determined to not be an urgent modification</del>; assess the proposed modification against the Prioritisation Criteria, taking into account the proposer’s assessment of the proposed modification against the Prioritisation Criteria, to determine its Prioritisation Category;”</p>	<p><b>The Constitution and Rules of The Distribution Code Review Panel of Great Britain: Paragraph 21(n)</b></p>
<p>Insertion of “<del>Where the proposed Annex 1 Standards and Annex 2 Standards modification has been</del></p>	<p><b>The Constitution and Rules of The Distribution Code</b></p>

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Proposed code text change	References (not limited to)
<p><del>determined not to be an urgent modification, t</del>The Panel shall assess the proposed modification against the Prioritisation Criteria, to decide upon the Prioritisation Category of the proposed modification. This assessment must take into account the proposer’s assessment of the proposed modification against the Prioritisation Criteria made in paragraph 4.1(i).”</p>	<p><b>Review Panel of Great Britain: Standard Procedure 1, Paragraph 4.1 (ii)</b></p>
<p>Insertion of “Where it is determined to not be an Urgent Change Proposal, and considering the views presented by the Proposer in paragraph 10.4.11, the Panel shall determine the Prioritisation Category of the Change Proposal by assessing it against the Prioritisation Criteria, as compared with other Change Proposals.”</p>	<p><b>DCUSA: Section 1C, Paragraph 10.12.2</b></p>
<p>Insertion of “GR.18.10 <del>Unless</del><del>Where</del> such Grid Code Modification Proposal has been determined <del>not</del> to be <del>either</del> an Urgent Modification <u>or meets the Fast Track Criteria</u>, the Grid Code Review Panel shall undertake an assessment of such Grid Code Modification Proposal against the Prioritisation Criteria to determine its Prioritisation Category, as compared with other Pending Grid Code Modification Proposals, and, taking into account the Proposer’s opinion provided pursuant to Clause GR.15.3 (l).”</p>	<p><b>Grid Code: Governance Rules, Part B, Paragraph GR.18</b></p>
<p>Insertion of “(g) where it has been determined not to be an Urgent Modification Proposal <u>or a Fast Track Self-Governance Modification Proposal</u>, should be treated as of being of a relevant Prioritisation Category, assessed pursuant to paragraph 18,5 (d) as compared with other Modification Proposals’ assessments pursuant to paragraph 18.5 (d).</p>	<p><b>IGT UNC: Part L, Paragraph 18.7</b></p>
<p>Insertion of “9.5A <del>Unless</del> an Issue or Change Proposal has been determined to not be an Urgent Issue or Change Proposal, <u>or a Housekeeping Change Proposal</u>, the Code Manager shall make the determination of the Prioritisation Category of the Issue or Change Proposal, by assessing it against the Prioritisation Criteria as compared with other Issue or Change Proposals, taking</p>	<p><b>REC: Schedule 5, Paragraph 9</b></p>

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<b>Proposed code text change</b>	<b>References (not limited to)</b>
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into account the Proposer’s opinion provided pursuant to paragraph 7.2.

Insertion of “(a) This shall include, ~~unless~~ where a Modification Proposal has been determined to ~~not~~ be an Urgent Proposal or a Fast-Track Modification, determining the Prioritisation Category of the Modification Proposal, by assessing it against the Prioritisation Criteria as compared with other Modification Proposals, taking into account the Proposer’s opinion provided pursuant to Section D1.7(k).”

**SEC: Section D, Paragraph D2A.3**

Insertion of “(c) ~~where a Modification Proposal has been determined not to be an Urgent Modification Proposal, and h~~having assessed the Modification Proposal against the Prioritisation Criteria, as compared with other Modification Proposals, taking into account the Proposer’s opinion provided pursuant to paragraph J.5.2.1.2A, the Modification Proposal should be accorded a relevant Prioritisation Category

**SQSS: Appendix J, Paragraph J.5.2.2.1**

Insertion of “(f) ~~unless~~ where the STC Modification Proposal ~~is has been determined not to be~~ an Urgent STC Modification Proposal or an STC Fast Track Modification Proposal, and having assessed the STC Modification Proposal against the Prioritisation Criteria, as compared with other STC Modification Proposals, to determine its Prioritisation Category, taking into account the Proposer’s opinion provided pursuant to Clause 7.2.2.2 (k), whether the Modification Proposal should be accorded a relevant Prioritisation Category.”

**STC: Section B, Paragraph 7.2.3.1**

Insertions of ‘7.2.2(h), 7.2.3(b)(v)’

**UNC: Modification Rules, Paragraph 7.2**

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### A2.3 Table 6

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<b>Proposed code text change</b>	<b>References (not limited to)</b>
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<p>Insertion of “(e) <u>where Modification Proposals are amalgamated and the resultant amalgamated Modification Proposal is not an Urgent Modification Proposal or Fast Track Self-Governance Modification Proposal</u>, the Panel shall determine the amalgamated Modification Proposal to have a single Prioritisation Category. <u>When determining a Prioritisation Category for an amalgamated Modification Proposal, the Panel shall consider the Prioritisation Categories, and the relevant assessments undertaken in determining these Prioritisation Categories, accorded to the original Modification Proposals that have been amalgamated</u>, <del>by considering the Prioritisation Categories accorded to them (and the relevant assessments undertaken in determining these Prioritisation Categories), and determining an appropriate amalgamated Prioritisation Category.”</del>”</p>	<p><b>BSC: Section F, Paragraph 2.3.2</b></p>
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<p>Insertion of “(d) <u>where CUSC Modification Proposals are amalgamated and the resultant amalgamated CUSC Modification Proposal is not an Urgent CUSC Modification Proposal or a CUSC Modification Fast Track Proposal</u>, the Panel shall determine the amalgamated CUSC Modification Proposal to have a single Prioritisation Category. <u>When determining a Prioritisation Category for an amalgamated CUSC Modification Proposal, the Panel shall consider the Prioritisation Categories, and the relevant assessments undertaken in determining these Prioritisation Categories, accorded to the original CUSC Modification Proposals that have been amalgamated</u>, <del>by considering the Prioritisation Categories accorded to them (and the relevant assessments undertaken in determining these Prioritisation Categories), and determining an appropriate amalgamated Prioritisation Category.”</del>”</p>	<p><b>CUSC: Section 8, Part C, Paragraph 8.19.4</b></p>
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<p>Insertion of “(d) <u>where the amalgamated Grid Code Modification Proposal has been determined not to be an Urgent Grid Code Modification Proposal or a Grid Code Fast Track Proposal</u>, the <b>Grid Code Review</b> Panel shall determine the amalgamated Grid Code Modification Proposal to have a single Prioritisation Category. <u>When determining a Prioritisation Category for an amalgamated Grid Code Modification Proposal, the Grid Code</u></p>	<p><b>Grid Code: Governance Rules, Part B, Paragraph GR.19.4</b></p>
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**Decision** – Energy code reform programme – decision on modifications to implement a harmonised code modification prioritisation process

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**Proposed code text change**

**References (not limited to)**

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Review Panel shall consider the Prioritisation Categories, and the relevant assessments undertaken in determining these Prioritisation Categories, accorded to the original Grid Code Modification Proposals that have been amalgamated.” by considering the Prioritisation Categories accorded to them (and the relevant assessments undertaken in determining these Prioritisation Categories), and determining an appropriate amalgamated Prioritisation Category.”

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Insertion of “(d) the Panel shall determine the amalgamated Modification Proposal to have a single Prioritisation Category. When determining a Prioritisation Category for an amalgamated Modification Proposal, the Panel shall consider the Prioritisation Categories, and the relevant assessments undertaken in determining these Prioritisation Categories, accorded to the original Modification Proposals that have been amalgamated. by considering the Prioritisation Categories accorded to them (and the relevant assessments undertaken in determining these Prioritisation Categories), and determining an appropriate amalgamated Prioritisation Category.”<sup>36</sup>

**SQSS: Appendix J, Paragraph J.5.2.2.6**

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Insertion of “(d) where STC Modification Proposals are amalgamated and the resultant amalgamated STC Modification Proposal is not an Urgent STC Modification Proposal or an STC Fast Track Modification Proposal, the Panel shall determine the amalgamated STC Modification Proposal to have a single Prioritisation Category. When determining a Prioritisation Category for an amalgamated STC Modification Proposal, the Panel shall consider the Prioritisation Categories, and the relevant assessments undertaken in determining these Prioritisation Categories, accorded to the original STC Modification Proposals that have been amalgamated.”

**STC: Section B, Paragraph 7.2.3.5**

**A2.4 Table 7**

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<sup>36</sup> In the [November 2025 consultation](#) this row in the table incorrectly referred to paragraph J.5.2.2.1(c). This has been corrected now.

**Decision** – Energy code reform programme – decision on modifications to implement a harmonised code modification prioritisation process

<b>Proposed code text change</b>	<b>References (not limited to)</b>
Insertion of “2.2.12 The Panel shall reassess the Prioritisation Category of Modification Proposals bi-annually and adjust the relevant modification timetable for each Modification Proposal accordingly.”	<b>BSC: Section F, Section 2.2</b>
Insertion of “8.30 REVIEW OF PRIORITISATION CATEGORY OF CUSC MODIFICATION PROPOSALS”	<b>CUSC: Section 8, Part C</b>
Insertion of “8.30.1 The CUSC Modifications Panel shall review the Prioritisation Category of CUSC Modification Proposals on a bi-annual basis and adjust the relevant modification timetable for each CUSC Modification Proposal accordingly.”	<b>CUSC: Section 8, Part C, Paragraph 8.30</b>
Insertion of “25 REVIEW OF PRIORITISATION CATEGORY OF PROPOSED MODIFICATIONS”	<b>The Constitution and Rules of The Distribution Code Review Panel of Great Britain</b>
Insertion of “25.1 The Panel shall review the Prioritisation Category of proposed modifications on a quarterly bi-annual basis and adjust the relevant modification timetable for each proposed modification accordingly.”	<b>The Constitution and Rules of The Distribution Code Review Panel of Great Britain, Section 25</b>
Insertion of “9 REVIEW OF PRIORITISATION CATEGORY OF ANNEX 1 STANDARDS AND ANNEX 2 STANDARDS MODIFICATION PROPOSALS”	<b>The Constitution and Rules of The Distribution Code Review Panel of Great Britain: Standard Procedure 1</b>
Insertion of “9.1 The Panel shall review the Prioritisation Category of Annex 1 Standards and Annex 2 Standards Modification Proposals on a <b>quarterly</b> bi-annual basis and adjust the relevant modification timetable for each Modification Proposal accordingly.”	<b>The Constitution and Rules of The Distribution Code Review Panel of Great Britain: Standard Procedure 1, Section 9</b>
Insertion of “Review of Prioritisation Category of Change Proposals	<b>DCUSA: Section 1C</b>

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<b>Proposed code text change</b>	<b>References (not limited to)</b>
11.33 The Panel shall review the Prioritisation Category of Change Proposals on a quarterly bi-annual basis and adjust the relevant modification timetable for each Change Proposal accordingly.”	
Insertion of “GR.27 REVIEW OF PRIORITISATION CATEGORY OF MODIFICATION PROPOSALS”	<b>Grid Code: Governance Rules, Part C</b>
Insertion of “GR.27.1 The Grid Code Review Panel shall review the Prioritisation Category of Modification Proposals on a bi-annual basis and adjust the relevant modification timetable for each Modification Proposal accordingly.”	<b>Grid Code: Governance Rules, Part C, Section 27</b>
Insertion of “34 Review of Prioritisation Category of Modification Proposals”	<b>IGT UNC: Part L</b>
Insertion of “34.1 The Panel shall reassess the Prioritisation Category of Modification Proposals bi-annually and adjust the relevant modification timetable for each Modification Proposal accordingly.”	<b>IGT UNC: Part L, Section 34</b>
Insertion of “29 Review of Prioritisation Category of Modification Proposals”	<b>REC: Schedule 5</b>
Insertion of “29.1. <del>The Code Manager shall review the Prioritisation Category of Modification Proposals on a bi-annual basis and adjust the relevant modification timetable for each Modification Proposal accordingly</del> <u>The Code Administrator shall schedule a bi-annual review of the Prioritisation Category of Modification Proposals as part of the IGT UNC Panel agenda and, following the IGT UNC Panel’s determinations, adjust the relevant modification timetable.</u> .”	<b>REC: Schedule 5, Section 29</b>
Insertion of “D13. REVIEW OF PRIORITISATION CATEGORY OF MODIFICATION PROPOSALS”	<b>SEC: Section D</b>

**Decision** – Energy code reform programme – decision on modifications to implement a harmonised code modification prioritisation process

Proposed code text change	References (not limited to)
Insertion of “D13.1 The Change Sub-Committee-Panel shall review the Prioritisation Category of Modification Proposals on a bi-annual basis and adjust the relevant modification timetable for each Modification Proposal accordingly.” <sup>37</sup>	<b>SEC: Section D, Section D13</b>
Insertion of “J.5.3 Review of Prioritisation Category of Modification Proposals”	<b>SQSS: Appendix J, Section J.5</b>
Insertion of “J.5.3.1 The Panel shall review the Prioritisation Category of Modification Proposals on a <u>bi-annual</u> adjust the relevant modification timetable for each Modification Proposal accordingly.”	<b>SQSS: Appendix J, Section J.5, Paragraph J.5.3</b>
Insertion of “7.5 Review of Prioritisation Category of STC Modification Proposals.”	<b>STC: Section B</b>
Insertion of “7.5.1 The STC Modification Panel shall review the Prioritisation Category of STC Modification Proposals on a bi-annual basis and adjust the relevant modification timetable for each STC Modification Proposal accordingly.”	<b>STC: Section B, Section 7.5</b>
Insertion of “12.13 Review of Prioritisation Category of Modification Proposals”	<b>UNC: Modification Rules, Section 12</b>
Insertion of “12.13.1 <u>The Code Administrator shall schedule a bi-annual review of the Prioritisation Category of Modification Proposals as part of the UNC Panel agenda and, following the UNC Panel’s determinations, adjust the relevant modification timetable for each Modification Proposal accordingly</u> <del>The Modification Panel shall review the Prioritisation Category of Modification Proposals on a bi-annual basis and adjust the relevant</del>	<b>UNC: Modification Rules, Section 12, Paragraph 12.13</b>

<sup>37</sup> Due to an error with formatting, this read as ‘The Change Sub-Committee Panel’ in the [November 2025 consultation](#). The ‘Panel’ should have been formatted in strikethrough. This has been amended for this decision publication.

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**Proposed code text change**

**References (not limited to)**

~~modification timetable for each Modification Proposal accordingly.”~~

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**A2.5 Table 8**

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**Proposed code text change**

**References (not limited to)**

Amendment of (b) to “whether each Modification is an Urgent Modification Proposal, or, ~~where the Modification is not an Urgent Modification Proposal,~~ the Prioritisation Category of each Modification, and the reasons for the Panel determining the Prioritisation Category of each Modification;

**BSC: Section F, Paragraph 1.3.3**

Insertion of “(g) where the Prioritisation Category of a Modification is changed, confirmation of the change alongside the reasons for the change; change should be reflected within the Modification Register alongside the reasons for its change.”

**BSC: Section F, Paragraph 1.3.3**

Amendment of (b) to “whether such CUSC Modification Proposal is an Urgent CUSC Modification Proposal, or, where such CUSC Modification Proposal ~~isn’t is determined not to be~~ an Urgent CUSC Modification Proposal or a CUSC Modification Fast Track Proposal, the Prioritisation Category of such CUSC Modification Proposal, and the reasons for the CUSC Modifications Panel’s determination of its Prioritisation Category; and”

**CUSC: Section 8, Part C, Paragraph 8.13.3**

Insertion of “(e) where the Prioritisation Category of a CUSC Modification Proposal is changed, confirmation of the change alongside the reasons for the change ~~this change should be reflected within the CUSC Modification Register alongside the reasons for its change.~~”

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**CUSC: Section 8, Part C, Paragraph 8.13.3**

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Proposed code text change	References (not limited to)
<p>Insertion of “This will include details of <del>whether a proposed modification has been determined to be an urgent modification or not, and, where a modification proposal has been determined to not be an urgent modification,</del> the assessment of the proposed modification against the Prioritisation Criteria, to determine its Prioritisation Category.</p>	<p><b>The Constitution and Rules of The Distribution Code Review Panel of Great Britain, Section 21, Paragraph (a)</b></p>
<p>Insertion of “(1) where the Prioritisation Category of a proposed modification is changed, <del>this change confirmation of the change, alongside the reasons for the change,</del> should be <del>reflected</del> recorded within the Distribution Code Modification Register <del>alongside the reasons for its change.</del></p>	<p><b>The Constitution and Rules of The Distribution Code Review Panel of Great Britain, Section 21, Paragraph (a)</b></p>
<p>Insertion of “<del>including whether a proposed Annex 1 Standards and Annex 2 Standards modification has been determined to be an urgent modification or not, and, where a modification proposal has been determined to not be an urgent modification,</del> the Prioritisation Category attached to the proposed modification<del>-, and details of the Panel’s assessment of the proposed modification against the Prioritisation Criteria, as compared with other proposed modifications, to determine the Prioritisation Category of the proposed modification.</del>”</p>	<p><b>The Constitution and Rules of The Distribution Code Review Panel of Great Britain: Standard Procedure 1, Section 4, Paragraph 4.1, Sub-paragraph (vi)</b></p>
<p>Insertion of “(1) where the Prioritisation Category of a proposed Annex 1 Standards and Annex 2 Standards modification is changed, <del>confirmation of</del> this change should be re<del>corded</del><del>lected</del> within the Annex 1 Standards and Annex 2 Standards Modification Register alongside the reasons for its change.”</p>	<p><b>The Constitution and Rules of The Distribution Code Review Panel of Great Britain: Standard Procedure 1, Section 4, Paragraph 4.1, Sub-paragraph (vi)</b></p>
<p>Insertion of “or the Prioritisation Category of the Change Proposal<del>, where this has been determined,</del> and details of the assessment undertaken in paragraph 10.12.2<del>, where this is made;</del>”</p>	<p><b>DCUSA: Section 1C, Paragraph 11.26, Sub-paragraph 11.26.3</b></p>

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Proposed code text change	References (not limited to)
<p>Insertion of “(a) where the Prioritisation Category of a Change Proposal is changed, <del>this change should be reflected within the Change Register alongside the reasons for its change.</del> <u>confirmation of the change should be reflected within the Change Register alongside the reasons for the change.</u>”</p>	<p><b>DCUSA: Section 1C, Paragraph 11.26, Sub-paragraph 11.26.3</b></p>
<p>Insertion of “(f) <del>unless where</del> such Grid Code Modification Proposal has been determined <del>not</del> to be an Urgent Modification <u>or meets the Fast Track Criteria</u>, the Prioritisation Category accorded to the Grid Code Modification Proposal, and details of the assessment of each Grid Code Modification Proposal against the Prioritisation Criteria carried out in GR18.10-</p> <p>(g) where the Prioritisation Category of a Grid Code Modification Proposal is changed, <u>confirmation of the change alongside the reasons for the change. this change should be reflected within the Modification Register alongside the reasons for its change.</u>”</p>	<p><b>Grid Code: Governance Rules, Part C, Paragraph GR13.3</b></p>
<p>Insertion of “GR.27.1 The Grid Code Review Panel shall review the Prioritisation Category of Modification Proposals on a bi-annual basis and adjust the relevant modification timetable for each Modification Proposal accordingly.”</p>	<p><b>Grid Code: Governance Rules, Part C, Section 27</b></p>
<p>Insertion of “35 Modification Register”</p>	<p><b>IGT UNC: Part L</b></p>
<p>Insertion of “35.1 The Code Administrator shall prepare and publish an updated Modification Register on the IGT UNC Website, which shall include:”</p>	<p><b>IGT UNC: Part L, Section 35</b></p>
<p>Insertion of “(a) whether each Modification Proposal has been determined to be an Urgent Modification Proposal, or, where a Modification Proposal <u>is has been determined to</u> not <del>be</del> an Urgent Modification</p>	<p><b>IGT UNC: Part L, Section 35, Paragraph 35.1</b></p>

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<b>Proposed code text change</b>	<b>References (not limited to)</b>
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Proposal ~~or a Fast Track Self-Governance Modification Proposal~~, its Prioritisation Category; ~~and~~

(b) the reasons for the IGT UNC Modification Panel’s determinations where they have been made in regard to the Prioritisation Category of Modification Proposals; ~~and~~

(c) where the Prioritisation Category of a Modification Proposal is changed, ~~confirmation of the~~ ~~is~~ change ~~should be reflected within the Modification Register alongside the reasons for~~ ~~its~~ change.”

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Insertion of “4.6. The Code Manager shall publish”	<b>REC: Schedule 5, Section 4</b>
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Insertion of “(a) Whether each Issue or Change Proposal has been determined to be an Urgent Issue or Change Proposal, or, where each ~~Proposal has been determined to not be~~ ~~is not~~ an Urgent Issue or Change Proposal ~~or a Housekeeping Change Proposal~~, its Prioritisation Category; ~~and~~

**REC: Schedule 5, Section 4, Paragraph 4.6**

(b) the reasons for the Code Manager’s determinations where they have been made in regard to the Prioritisation Category of ~~each~~ Issue or Change Proposals; ~~and~~

(c) where the Prioritisation Category of an Issue or Change Proposal is changed, ~~confirmation of the change alongside the reasons for the change this change should be reflected within the Change Register alongside the reasons for its change”~~

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Insertion of “(iv) whether a Modification Proposal has been determined to be an Urgent Proposal or not, and, where a Modification Proposal ~~has been determined to is~~ not ~~be~~ an Urgent Proposal ~~or a Fast-Track Modification~~, the Prioritisation Category attached to the Modification Proposal, and the reasons for the ~~Panel’s~~ Change Sub-Committee’s determinations where they have been made in regard

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**SEC: Section D, Paragraph D1.9(e)**

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to the Prioritisation Category of the Modification Proposal; ~~and~~

(v) where the Prioritisation Category of a Modification Proposal is changed, ~~confirmation of the change alongside the reasons for the change; this change should be reflected within the Modification Register alongside the reasons for its change~~<sup>38</sup>

Insertion of “(e) ~~whether a Modification Proposal has been determined to be an Urgent Proposal or not, and, where a Modification Proposal has been determined to not be an Urgent Proposal;~~ the Prioritisation Category attached to the Modification Proposal, and the reasons for the Panel’s determinations where they have been made in regard to the Prioritisation Category of the Modification Proposal; and

**SQSS: Appendix J, Paragraph J.5.2.7.3**

(f) where the Prioritisation Category of a Modification Proposal ~~has been~~ is changed, ~~this change should be reflected within the Modification Register alongside the reasons details of and the reasons~~ for its change.”

Insertion of “(e) whether an STC Modification Proposal has been determined to be an Urgent STC Modification Proposal or not, and, where an STC Modification Proposal ~~has been determined to not be is not~~ an Urgent Modification Proposal ~~or an STC Fast Track Modification Proposal~~, the Prioritisation Category accorded to the STC Modification Proposal, and details of the assessment of the Modification Proposal against the Prioritisation Criteria, carried out in sub-paragraph 7.2.3.1(f); ~~and;~~

**STC: Section B, Section 7.2, Paragraph 7.2.7, Sub-Paragraph 7.2.7.3**

(f) where the Prioritisation Category of an STC Modification Proposal ~~has been~~ is changed, ~~this~~

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<sup>38</sup> Due to an error with formatting, this read as ‘The Panel’s Change Sub-Committee’ in the [November 2025 consultation](#). The ‘Panel’ should have been formatted in strikethrough. This has been amended for this decision publication.

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**References (not limited to)**

~~change should be reflected within the Modification Register alongside details of and~~ the reasons for its change.”

Insertion of “12.14 Modification Register”

**UNC: Modification Rules,  
Section 12**

Insertion of “12.14.1 The Code Administrator shall prepare and publish an updated Modification Register on its Website, which shall include:

**UNC: Modification Rules,  
Section 12, Paragraph 12.14**

(a) whether each Modification Proposal has been determined to be an Urgent Modification Proposal, or, where a Modification Proposal ~~has been determined to~~ is not ~~be~~ an Urgent Modification Proposal ~~or does not satisfy the Fast Track Self Governance Criteria~~, its Prioritisation Category; ~~and~~

(b) the reasons for the Modification Panel’s determinations where they have been made in regard to the Prioritisation Category of Modification Proposals; ~~and~~

(c) where the Prioritisation Category of a Modification Proposal changes, ~~this change should be reflected within the Modification Register alongside the reason for its change~~ confirmation of the change alongside the reasons for the change.”

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