

---

## **Energy code reform programme– statutory consultation on modifications to industry codes to implement the harmonised code modification prioritisation process – response template**

This document provides a template for responses to our statutory consultation on modifications to industry codes to implement the harmonised code modification prioritisation process, published on 20 November 2025.

If you are interested in responding to this consultation, please complete this word document and send it to [industrycodes@ofgem.gov.uk](mailto:industrycodes@ofgem.gov.uk) by the end of the day on 12 January 2026.

### **Guidance**

We typically publish consultation responses when we publish our decision. To ensure that we can correctly attribute your response, please ensure that you enter all relevant details in the “your company’s details” section (template part 1).

If you would like us to treat your response as being confidential, either in full or in part, please indicate this to us below. Further information on how we will treat your response, data and confidentiality can be found at the end of this document.

Please use template part 2 to provide your responses. For all questions, the template below provides space for you to enter free text comments. Some questions also ask whether you agree with our proposals. Please indicate the extent to which you agree or disagree with relevant proposals by deleting all but one of the bullets provided.

There is also a section for “general feedback” (template part 3). Please use this section to provide any views on the overall consultation process.

### **Template part 1: your organisation’s details**

<b>Contact name</b>	<b>Kelly Kinsman</b>
<b>Role title</b>	<b>National Change Manager</b>
<b>Company name</b>	<b>National Grid Electricity Distribution</b>
<b>Telephone number</b>	<b>01752 502208</b>
<b>Email address</b>	<b>kkinsman@nationalgrid.co.uk</b>
<b>Date of submission</b>	<b>12/1/26</b>
<b>Do you want your response treated as confidential?</b>  <b>(If yes, please indicate whether you would like the whole of your response to be confidential, or just particular parts).</b>	<b>No</b>

## Template part 2: consultation responses

**Question 1:** Do you agree with the policy and associated code modifications proposed in Section 1. Prioritisation process?

Agree

Comments:

We support the principle of aligning the prioritisation process across all relevant codes. The proposed framework, which differentiates between urgent and non-urgent modifications, provides clarity and consistency in the progression of modification proposals.

However, we note that urgent modifications are treated separately and the proposals do not explicitly incorporate them within the scope of “Prioritisation Category.” As urgent modifications are inherently a form of prioritisation, consideration should be given to including them within the framework to simplify the legal text and ensure consistent treatment across codes.

Additionally, there is a risk that high-priority modifications could consume significant resources, potentially affecting the pace of standard-priority modifications. Clear guidance on managing resource allocation across modification categories will be important.

**Question 2:** Do you agree with the policy and associated code modifications proposed in Section 2. Prioritisation criteria and governance?

Agree

Comments:

The criteria outlined, including alignment with the Strategic Direction Statement, complexity, system impact, and industry/consumer importance, are appropriate. Transparency in decision-making and the opportunity for reassessment are positive developments.

From a DNO perspective, it is essential that prioritisation criteria fairly reflect distribution-level needs, particularly where operational or local system risks may not be captured under system-wide urgency assessments. There is a risk that inconsistent application across codes, particularly for cross-code modifications, could lead to perceptions of inequity.

We recommend that clear guidance is provided for proposers and code managers to support consistency in applying prioritisation criteria, including for modifications that are amalgamated or have cross-code impacts.

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

Agree

Comments:

We welcome the reporting and governance proposals, including twice-yearly and ad hoc reviews of prioritisation, and the documentation of rationale for decisions. Transparent reporting is crucial to allow DNOs to plan internal resources and investment programmes.

A potential risk is constant reprioritisation and frequent changes to prioritisation could disrupt delivery timelines and create additional work for proposers. Clear mechanisms for assessing the impact of reprioritisation on proposers and potential mitigations would be beneficial.

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

Agree

Comments:

The proposed framework appears implementable and provides a clear pathway for non-urgent modifications. We note, however, that the implementation window of 28 days may be challenging for modifications requiring system or process changes.

Additionally, transitional arrangements, including during the period prior to the appointment of a Code Manager, need to ensure that modifications submitted in this period are not disadvantaged and that prioritisation decisions are appropriately reviewed once the new governance framework is in place.

**Question 5:** Do you agree with our proposed implementation date of 28 days from the publication of the related prioritisation policy decision notice?

Neither agree nor disagree

Comments:

While a prompt implementation is desirable, a 28-day window may be challenging for modifications that require system, process, or cross-code coordination. Flexibility or staged implementation may reduce the risk of errors or delays

**Question 6:** Do you agree with the proposed guidance in ‘Annex A: Proposed Authority guidance on code modification prioritisation’?

Agree

Comments:

The guidance is clear and supports consistent application of prioritisation criteria. We welcome the emphasis on transparency and stakeholder engagement.

To improve usability, we suggest including templates or standard formats for proposer assessments to reduce potential disproportionate burdens on smaller participants and ensure consistent, proportionate application of criteria.

**Question 7:** Do you agree with the proposed code text drafting published in annexes B-L?

Agree

Comments:

We support the legal drafting; however, we note that the current drafting does not explicitly address urgent modifications in the context of Prioritisation Categories. Specific considerations include:

- Extending the definition of Prioritisation Category to include urgent modifications.
- Applying prioritisation-related requirements (e.g., reporting, bi-annual reviews, Code Modification Register entries) to urgent modifications where appropriate.
- Ensuring amalgamated urgent modifications are consistently classified across all relevant codes.

Addressing these points we feel would simplify the legal drafting and ensure consistency in the treatment of urgent modifications across codes.

### Template part 3: general feedback

We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to the following questions.

Question	Response
Do you have any comments about the overall process of this consultation?	
Do you have any comments about its tone and content?	
Was it easy to read and understand? Or could it have been better written?	
Were its conclusions balanced?	
Did it make reasoned recommendations for improvement?	
Any further comments?	

### Your response, data and confidentiality

You can ask us to keep your response, or parts of your response, confidential. We'll respect this, subject to obligations to disclose information, for example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

---

If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you *do* wish to be kept confidential and those that you *do not* wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we'll get in touch with you to discuss which parts of the information in your response should be kept confidential, and which can be published. We might ask for reasons why.

If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the UK's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.

If you wish to respond confidentially, we'll keep your response itself confidential, but we will publish the number (but not the names) of confidential responses we receive. We won't link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.