
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 industrycode@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

Contact name	Karl Maryon
Role title	DCUSA Limited Chair
Company name	DCUSA Limited
Telephone number	020 7432 3011
Email address	dcusa@electralink.co.uk
Date of submission	12 January 2026
Do you want your response treated as confidential? (If yes, please indicate whether you would like the whole of your response to be confidential, or just particular parts).	No, we are happy for all of our responses to be openly shared.

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: As an opening comment to this consultation response, we would like to make the point that the DCUSA processes up to now have not been an issue for parties in terms of progressing change proposals at an appropriate pace that also considers urgency and prioritisation. This has been perhaps due to manageable volumes of Change Proposals and an appropriately resourced secretariat. We do recognise this may not be the case with other codes and looking ahead at the future Code Manager model we understand and support the need for consistency and transparency to be codified. We are limiting our response to the policy and code modifications relating to the DCUSA and are comfortable with what is proposed for the Prioritisation process.

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

- Agree

Comments: We are limiting our response to the policy and code modifications relating to the DCUSA and are generally comfortable with what is proposed for the Prioritisation criteria and governance. However, following an internal dry run of applying the current guidance to the existing suite of DCUSA Change Proposals, we have identified an issue that perhaps with a further level of scoring within the weighted criterion we could develop a more robust prioritisation/ranking of Change Proposals within the High and Standard categorisations. To assist, we have included as Attachment 1 our draft modelling tool that we are happy to discuss the practical workings with you if this would help.

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

- Agree

Comments: We are limiting our response to the policy and code modifications relating to the DCUSA and are comfortable with what is proposed for the Prioritisation reporting and governance.

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

[Please delete all but one bullet]

- Agree

Comments: We are limiting our response to the policy and code modifications relating to the DCUSA and are comfortable with what is proposed for the Policy Implementation.

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

- Disagree

Comments: We support the requirement to implement the new policy and processes at the earliest practicable opportunity. We do however consider that 28 days is insufficient time to allow for all the changes required to be fully implemented and importantly to have had a full cycle of monthly Code Panel meetings. Also, dependant upon the actual decision date the timing impact to each Code Panel will be different. Our proposal is that the implementation can commence immediately from the date of the decision notice and is required to be fully implemented and complete by the 3rd Code Panel meeting following the date of the decision notice. We do recognise that preparatory work to facilitate the new policy and processes can be undertaken in advance of the decision notice, however, we would prefer, despite the low probability of changes, of not undertaking work at risk and wait until the policy and code modifications are confirmed.

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

- Agree

Comments: ‘Annex A: Proposed Authority guidance on code modification prioritisation’ is useful as it will become the formal reference point for all to help ensure appropriate and consistent decision making across all codes, with the rationale behind those decisions clearly articulated for all to understand.

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

- Agree

Comments: We are comfortable with the proposed draft legal text.

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?	This is well-written consultation, but we do note that some errors have slipped through which is unfortunate. An example being quarterly and bi-annual both remaining in the same sentence and there is clearly a cut and pasting issue with paragraph 4.6.
Do you have any comments about its tone and content?	The tone was appropriate.
Was it easy to read and understand? Or could it have been better written?	It was a relatively easy read. I think the call outs for "Reason" and "Effect" were particularly useful.
Were its conclusions balanced?	Yes, all the conclusions were logical and fair.
Did it make reasoned recommendations for improvement?	Yes, all the recommendations were logical and appropriate.
Any further comments?	No.

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.