
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 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

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Date of submission	12-1-26
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

Template part 2: consultation responses

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

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

NESO supports the rationale and principle of aligning the prioritisation of change across codes. Effective prioritisation will be essential to successfully transition from code administration to code management, deliver extensive programmes of work, such as Connections Reform and Reformed National Pricing, in line with the SDS, and support the move to net zero.

We question why the proposed approach is limited to modifications classified as non-urgent. While the volume of urgent modifications is expected to be low, applying a consistent process to all changes - both urgent and non-urgent - would minimise

confusion for Code parties and ensure that all modifications are prioritised appropriately.

A uniform, cross-code process would introduce greater standardisation across industry codes, enabling more efficient resource allocation and supporting the prioritisation of strategically important projects.

It is worth noting that under some codes and standards (e.g. the STC, SQSS, BSC, UNC and IGTUNC), all modifications are given equal priority (unless they are urgent). This contrasts with the CUSC, where prioritisation is already applied, as highlighted in the consultation.

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

- Strongly agree
- **Agree (Please refer to our comments, as we agree with certain aspects and have provided recommendations for others)**
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

Feedback on Prioritisation Categories and Criteria

Removing the “low priority” category could impact the number of smaller, incremental improvements to the codes being raised and/or progressed by Code parties. We believe these incremental changes are important and should not be overlooked, as collectively they can deliver meaningful step changes over time. Additionally, removing a category may lead to a large volume of modifications within the remaining categories, making differentiation and prioritisation, particularly without a clear scoring mechanism, more challenging. Having more proposals grouped into, for example, a broad ‘Standard’ category also reduces the likelihood of incremental changes being progressed. A balanced approach is required to ensure smaller changes are not overlooked and to enable Code Panels, Administrators, and Code Managers to prioritise more effectively.

NESO supports including the SDS criterion and agrees that the proposed criteria are broadly reasonable. While the criteria appear clear, they may be interpreted differently in practice. Having two sets of criteria - ‘urgent’ criteria for urgent modifications and ‘prioritisation criteria’ for non-urgent modifications - could be confusing, particularly when differentiating between the high-priority and urgent governance route. This approach could also incentivise industry participants to classify their modifications as ‘urgent’ to bypass the prioritisation process. Using urgency to avoid SDS alignment, for example, seems inappropriate and should be discouraged.

We recommend clarifying the distinction between urgent and high-priority modifications to ensure resources and timescales associated with each modification are managed effectively. Urgency could remain within the scope of the new framework, with its definition reviewed to ensure it is fit for purpose against the new prioritisation categories and criteria.

Roles and Responsibilities

NESO agrees that all relevant Code parties should continue to raise proposals for change. Proposers should identify why a change is necessary and provide an initial assessment of their proposal against the prioritisation criteria. However, Proposers are neither impartial nor aware of other changes in progress, which could make their prioritisation assessment subjective. In the transitional period, the Code Panel, supported by Code Administrators, will be able to make prioritisation decisions based on a broader portfolio view. To do this effectively, significant secretariat support from Code Administrators will be required to assist with assessing relative priorities.

Amalgamated and cross-Code modifications

The consultation document refers to amalgamated modifications. According to the Grid Code Governance Rules, amalgamated modifications (to a single Code) are related to the same topic and would increase efficiency to be considered together or are logically dependent on each other. An example of this is [GC0107](#) and [GC0113](#), where Panel have agreed to amalgamate modifications. NESO agrees with the recommendation that such groups of modifications should be evaluated by Panel to determine, where appropriate, a singular prioritisation category.

As referenced in the consultation, cross-code modifications refer to a suite or programme of changes across multiple Codes. An example of this is the CATO (Competitively Appointed Transmission Owner) modifications, which introduced the CATO framework (Grid Code [GC0159](#), CUSC [CMP403 & CMP404](#), STC [CM086 & CM087](#), SQSS [GSR031](#), STCP [PM0134 & PM0136](#)). In the consultation it is recommended that the Cross Code Steering Group (CCSG) provides relevant direction to determine a “lead” Code for such a group of modifications and that Code’s procedures, including its prioritisation determination, would be followed. We agree in principle with this recommendation; however, both the CCSG and Code Panels should retain discretion to apply different prioritisation categories where appropriate. We would also suggest that the Proposer also has a role in supporting the CCSG.

It would be helpful to understand more about what framework the CCSG will use to assess the prioritisation of modifications in a cross-Code suite. For example, if there is a cross-Code suite with a small consequential STC modification, how the CCSG assesses whether it’s appropriate for that to be granted the same prioritisation status as the “lead” modification (e.g. a CUSC modification).

Risks Identified

- Proposers may frequently challenge assigned priorities, which could create resource pressures for Panels and affect modification progression. Does the Panel’s view remain in effect unless and until it is formally overturned by Ofgem?
- Participants may seek to classify more modifications as urgent to bypass prioritisation.
- Without clear criteria (across urgent and non-urgent modifications), confusion, inconsistency and gaming of the process could occur.

Key Questions

- Could the introduction of a scoring matrix (or a suitable alternative) be considered to enable Code Administrators, Code Panels, and appointed Code Managers to consistently assess and prioritise modifications? This would support prioritisation and promote a more streamlined, standardised approach across all codes.
- What role if any will the CCSG play in cases where urgent changes have consequential modifications? Will those consequential modifications inherit urgency even if they have not been through prioritisation?
- To make the Urgent process more efficient, can it include a timeframe in which Ofgem will make decisions on Urgent modifications?

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

- Strongly agree
- **Agree (Please refer to our comments, as we agree with certain aspects and have provided recommendations for others)**
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don’t know/no view

Limiting prioritisation to only non-urgent modification proposals and limiting the process to just two categories (High and Standard) risks diminishing the ability of Code Panels (supported by Code Administrators), particularly those managing significant volumes of change, to differentiate proposals based on merit. If the goal is to provide prioritisation relative to other change proposals, this will be challenging to achieve with only two priority categories and three criteria.

If we assume that the primary driver for all strategic change is alignment with the SDS, can we then assume that strategic items will be prioritised initially based on their SDS classification, for example, with ‘Act Now’ changes ranked highest? This requires clarity on whether the three criteria are intended to be treated equally.

NESO recommends quarterly reviews of the prioritisation stack (as is currently undertaken on CUSC and Grid Code Panels), supplemented by ad hoc reviews where necessary. NESO supports the proposed reporting approach and agrees that introducing a new appeals process is unnecessary (however, please refer to our earlier comments on the associated risks, which highlights a question regarding the appeals process).

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

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

The proposal appears reasonable; however, it is essential to establish clear guidelines and provide support during the initial implementation phase to ensure consistent application across all codes.

Prioritising the current backlog of change is both logical and necessary if we are to align all code changes with the SDS that will guide priorities in 2026. This approach must apply from day one to both incoming work and the existing live pipeline. Careful consideration should be given to how the new prioritisation stack will interact with the legacy stack to avoid confusion or delays.

NESO agrees that modifications awaiting Authority decision, or changes already approved but not yet implemented, should remain out of scope. Send-backs are not referenced in the consultation. It is recommended that they remain outside the scope of the new prioritisation framework. However, Code Panels should retain discretion to introduce a send-back into the prioritisation stack where appropriate, for example, where workgroups have reconvened for further work before re-submitting, as with GC0117.

There may be other areas where Code Panels should also retain discretion, such as where a long-running modification has only one or two workgroups remaining, and Panels feel it would be better for the workgroup process to conclude and for the modification to be submitted to Ofgem, rather than have the modification re-prioritised to, for example, a lower category. This could make it more difficult to progress the modification (note that a similar situation happened in 2025 during CUSC prioritisation).

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

- Strongly agree
- Agree
- Neither agree nor disagree
- **Disagree**
- Strongly disagree
- Don't know/no view

It is recommended that there is a grace period to transition to and adapt to this new process, particularly given the need to revisit existing (not live) modifications and engage with modification Proposers. For example, a 3-month lead time would be more appropriate for all stakeholders to become accustomed to the process. A 28-day turnaround is very tight – particularly for Codes for which there is a relatively large number of Modifications, with different Proposers (e.g. the CUSC and the Grid Code) – and related tasks and impacts should be fully considered.

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

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

The Annex is generally helpful in summarising the proposals; however, under section b) 'Criteria Weighting' (page 12), the statement that 'all criteria should be given equal weighting' appears inconsistent with earlier paragraphs. For example, page 10 notes that modifications clearly aligned with the SDS, particularly those in the 'Act Now' category, are more likely to be prioritised as high priority. Similarly, under 'Importance', it states that modifications delivering significant value or addressing high-risk issues are likely to be prioritised as high rather than standard priority.

While we agree with these principles, the context is critical. We would have expected guidance on primacy driven by value. For instance, strategic changes aligned to the SDS

in the ‘Act Now’ category should have primacy, followed by high-value BAU changes. SDS ‘Think and Plan’ items should rank above non-strategic changes, while high-value BAU changes without SDS alignment, but unlikely to be superseded by SDS, should rank above non-aligned changes expected to be updated soon.

A weighting table would help ensure consistency across codes and provide clear guidance to Code Managers and Code Panels.

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

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don’t know/no view

Please refer to the table below for general observations and proposed amendments to the legal text provided based on your proposals. The legal text should also incorporate the recommended changes outlined above (if taken forward) which may require further edits to your legal text. The legal text for our recommendations has not been included in our review, but we are happy to discuss.

Activity	Observation	Mitigation
Annex C CUSC proposed legal drafting		
Consultation document paragraph 4.10 - Prioritisation in modification registers and reports	Proposed code text change inserted at CUSC Section 8, Part C, paragraph 8.13.3(c) doesn't follow on from opening words in paragraph 8.13.3 and should be amended (see opposite under "Mitigation").	"8.13.3 The CUSC Modification Register shall record in respect of current outstanding CUSC Modifications Panel business: (c) where the Prioritisation Category of a CUSC Modification Proposal <u>has been</u> is changed, this change should be reflected within the CUSC Modification Register alongside details of and the reasons for <u>the</u> its change."

[Amended elsewhere](#)

<p>Consultation document paragraph 4.16 - Code modification reports</p>	<p>The proposed text change to CUSC paragraph 8.14 Progress Reports needs to be amended.</p> <p>(1) The proposed change to paragraph 8.14.2(c)(i) means that Progress Reports will not record details of Urgent CUSC Modification Proposals, only the Prioritisation Category proposed to be, or that is, accorded to each CUSC Modification Proposal. <i>Is that the correct position?</i> yes</p> <p>(2) Annex C proposed text doesn't reproduce sub-paragraphs 8.14.2(d) to (g) . CUSC sub-paragraph 8.14.2(g) refers to the basis for each decision specified in paragraph 8.14.2 being recorded in the progress report. The proposed change to paragraph 8.14.2(c)(i) includes the reasons for determinations being recorded in the progress report, which creates duplication and could be deleted (as proposed in red text opposite under "Mitigations"). Amended</p> <p>(3) The proposed change to paragraph 8.14.2(c)(iii) is difficult to follow and could be clarified (as proposed in red text opposite under "Mitigation").</p>	<p>"8.14.2 The Progress Report shall contain:</p> <p>(c) details of:</p> <p>(i) the priority where each CUSC Modification Proposal in the CUSC Modification Register is proposed to be accorded or is accorded by the CUSC Modifications Panel to not be an Urgent CUSC Modification Proposal, the Prioritisation Category proposed to be accorded or that is accorded to each CUSC Modification Proposal, and the reasons for the CUSC Modifications Panel's determination of the Modification Proposal's Prioritisation Category (in accordance with Paragraph 8.19.1);</p> <p>(iii) the impact of the priority whether each CUSC Modification Proposal is accorded to be an Urgent CUSC Modification Proposal; or, where each CUSC Modification Proposal is accorded not to be an Urgent CUSC Modification Proposal, the Prioritisation Category accorded to each such CUSC Modification Proposal, by reference to each other pending CUSC Modification Proposal;"</p>
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CUSC section 8.19 - Panel proceedings	Under the proposed new paragraph 8.19.4(d), where CUSC Modification Proposals are amalgamated, the Panel shall determine the amalgamated CUSC Modification Proposal to have a single <i>Prioritisation Category</i> by considering the Prioritisation Categories accorded to them. This precludes the Panel from determining that the amalgamated CUSC Modification Proposal should be an Urgent CUSC Modification Proposal. <i>Is that the correct position?</i>	to check - amended for now
CUSC paragraph 8.23.13 - CUSC Modification Report	In the proposed text change at paragraph 8.23.13, "and" has been omitted and should be reinstated (see red text opposite under "Mitigation"). amended	"8.23.13 If a CUSC Modification Report is to be revised and re-submitted in accordance with a direction issued pursuant to Paragraph 8.23.12, it shall be re-submitted as soon after the Authority's direction as is appropriate, (and in the case of an EBR Amendment within 2 months), taking into account <u>the Prioritisation Criteria, and whether the CUSC Modification Proposal is an Urgent CUSC Modification Proposal, or if it has been determined to not be an Urgent CUSC Modification Proposal, its Prioritisation Category</u> the complexity, importance and urgency of the CUSC Modification Proposal and , <u>where any Workgroup Alternative CUSC Modification(s) have been determined to not be Urgent Workgroup Alternative CUSC Modification(s), the Prioritisation Category of any Workgroup Alternative CUSC Modification(s).</u> "
Annex F Grid Code proposed legal drafting		

<p>Consultation document paragraph 4.10 - Prioritisation in modification registers and reports</p> <p>amended elsewhere</p>	<p>Proposed code text change inserted at Grid Code GR.13.3(g) doesn't follow on from opening words in GR.13.3 and should be amended (as proposed in red text opposite under "Mitigation").</p> <p>Also, "; and" inserted incorrectly at the end of GR.13.3(e) instead of proposed new GR.13.3(f).</p>	<p>"GR.13.3 The Grid Code Modification Register shall record in respect of current outstanding Grid Code Review Panel business: <u>(g) where the Prioritisation Category of a Grid Code Modification Proposal has beenis changed, this change should be reflected within the Modification Register alongside details of and the reasons for theits change."</u></p>
<p>Grid Code GR.19.1(b) - Panel proceedings</p> <p>amended</p>	<p>There are two typos in the proposed text change at GR.19.1(b) (duplicated "the" and space inserted before instead of after the closed bracket) (see red text opposite under "Mitigation").</p>	<p>"(b) The Grid Code Review Panel shall establish the part of the timetable for the consideration by the Grid Code Review Panel and by a Workgroup (if any) which shall be no longer than six months unless in any case the particular circumstances of the Grid Code Modification Proposal (taking due account of <u>the Prioritisation Criteria, and whether the Grid Code Modification Proposal is an Urgent Modification, or, if it has been determined to not be an Urgent Modification, in accordance with section GR.23, the Prioritisation Category of the the Grid Code Modification Proposal, its complexity, importance and urgency</u>) justify an extension of such timetable, and provided the Authority, after receiving notice, does not object, taking into account all those issues."</p>

Grid Code section GR.19.4(d) - Panel proceedings	Under the proposed new section 19.4(d), where Grid Code Modification Proposals are amalgamated, the Panel shall determine the amalgamated Grid Code Modification Proposal to have a single <i>Prioritisation Category</i> by considering the Prioritisation Categories accorded to them. This precludes the Panel from determining that the amalgamated Grid Code Modification Proposal should be an Urgent Modification. <i>Is that the correct position?</i>	
Grid Code section GR.22 - Grid Code Modification Reports	Query if there is a typo at proposed new section GR.22.2(g)(vii) (use of "each" instead of "the" as identified in red text opposite under "Mitigation").	<u>"(vii) where such Grid Code Modification Proposal has been determined not to be an Urgent Modification, details of the assessment of each the Grid Code Modification Proposal against the Prioritisation Criteria, to determine its Prioritisation Category, in accordance with paragraph GR18.10;"</u>
Grid Code section GR.22.12 - Grid Code Modification Reports	Typo needs to be corrected ("has" should read "have" as identified in red text opposite under "Mitigation").	"GR.22.12 If a Grid Code Modification Report is to be revised and re-submitted in accordance with a direction issued pursuant to GR.22.11, it shall be resubmitted as soon after the Authority's direction as is appropriate (and in the case of an amendment to the areas set out in table 1 of the GR.B annex which details the Regulated Sections of the code within 2 months), taking into account the Prioritisation Criteria, and whether the Grid Code Modification Proposal and any Workgroup Alternative Grid Code Modification(s) are Urgent Modifications, or, if they hashave

amended		<p>been determined to not be Urgent Modifications, in accordance with section GR.23, the Prioritisation Category complexity, importance and urgency of the Grid Code Modification Proposal and any Workgroup Alternative Grid Code Modification(s). The Grid Code Review Panel shall decide on the level of analysis and consultation required in order to comply with the Authority's direction and shall agree an appropriate timetable for meeting its obligations. Once the Grid Code Modification Report is revised, the Grid Code Review Panel shall carry out its Grid Code Review Panel Recommendation Vote again in respect of the revised Grid Code Modification Report and re-submit it to the Authority in compliance with GR.22.4 to GR.22.6."</p>
Annex J SQSS proposed legal drafting		
<p><i>The SQSS does not currently contain a modification prioritisation procedure, and the concept of an urgent modification proposal does not exist.</i></p> <p><i>The consultation document fails to take this into consideration. If the objective of the statutory consultation is to achieve harmonised code modification prioritisation processes across all industry codes, including the SQSS, then additional text changes are necessary so that the proposed changes can operate as intended.</i></p> <p><i>The below comments on the proposed SQSS text changes have been made as if the SQSS already contains a modification prioritisation or urgency procedure. They do not purport to address that omission.</i></p>		
SQSS J.4 - Establishment and composition	<p>SQSS Appendix J Governance Framework refers to "modification proposals", not "Change Proposals".</p> <p>The word "been" has been omitted from the proposed text change to paragraph J.4.2.2.6(a) which could be used as an opportunity also to correct the opening</p>	<p>"J.4.2.2 The functions of the panel shall be to:</p> <p>J.4.2.2.4 publish recommendations to modify the SQSS and the reasons for the recommendations; and</p> <p>J.4.2.2.5 recommend to the authority any modifications of the SQSS; and,</p> <p>J.4.2.2.6 and the panel shall endeavour at all times to perform its functions:</p> <p>(a) in an efficient, economical and expeditious manner, taking account</p>

	wording to paragraph J.4.2.2.6(a), which does not follow on from the opening words of paragraph J.4.2.2 (as proposed in red text opposite under "Mitigation").	of the <u>Prioritisation Criteria</u> , and whether the Issue or Change Modification Proposal has been determined to be an Urgent Issue or Change Modification Proposal, or, where it has been determined to not be an Urgent Issue or Change Modification Proposal, the <u>Prioritisation Category complexity, importance and urgency of a particular modification to the SQSS; and"</u>
	amended through removing urgent	
SQSS J.5 - Modification of the SQSS	<p>amended through removing urgent</p> <p>The proposed text change inserted at paragraph J.5.1.2(i) uses the terms "Issue" and "Change Proposal" which do not appear in the SQSS and should be changed to "Modification Proposal" (as identified in red text opposite under "Mitigation").</p>	<p>"J.5.1.2 The members shall endeavour at all times to act pursuant to this J.5:</p> <p>(i) in an efficient, economical and expeditious manner taking account of the <u>Prioritisation Criteria</u>, and whether the Issue or ChangeModification-Proposal has been determined to be an Urgent Issue or ChangeModification Proposal, or, where it has determined to not be an Urgent Issue or ChangeModification Proposal, the <u>Prioritisation Category complexity, importance and urgency of a particular mModification pProposal; and"</u></p>
SQSS J.5 - Modification of the SQSS	Under the proposed new paragraph J.5.2.2.6(d), where Modification Proposals are amalgamated, the Panel shall determine the amalgamated Modification Proposal to have a single <i>Prioritisation Category</i> by considering the Prioritisation Categories accorded to them. This precludes a determination that the amalgamated Modification Proposal should be an Urgent Modification Proposal (should an urgency	there is no urgency here

	procedure be introduced in the SQSS). <i>Is that the correct position?</i>	
SQSS J.5 - Modification of the SQSS	<p>amended</p> <p>The proposed text change inserted at paragraph J.5.2.4.1(g) doesn't follow on from the opening words in paragraph J.5.2.4.1 and should be amended either to delete the word "detail" or else as identified in red text opposite (under "Mitigation").</p>	<p>"J.5.2.4.1 Following completion of the steps set out in sub-paragraphs J.5.2.3.1 to J.5.2.3.15 above (where relevant), the Secretary shall prepare a consultation document ("Consultation Document") setting out:</p> <p>(g) <u>details of the analysis carried out, pursuant to paragraph J.5.2.2.1 (c), by the Panel to determine the Prioritisation Category of the Modification Proposal, and the Prioritisation Category that has been determined, where this determination has been carried out.</u>"</p>
Consultation document paragraph 4.10 - Prioritisation in modification registers and reports	<p>The proposed text change inserted at paragraph J.5.2.7.3(e) uses the term "Urgent Proposal" yet other proposed text changes use the term "Urgent Modification Proposal". If an urgency procedure is incorporated into the SQSS then there will need to be consist use of terminology.</p> <p>Proposed code text change inserted at SQSS Appendix J, paragraph J.5.2.7.3(f) doesn't follow on from opening words in paragraph J.5.2.7.3 and should be amended (as proposed in red text opposite under "Mitigation").</p>	<p>"J.5.2.7.3 The Modification Register shall record:</p> <p>(e) <u>whether a Modification Proposal has been determined to be an Urgent [Modification] Proposal or not, and, where a Modification Proposal has been determined to not be an Urgent [Modification] 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</u></p> <p>(f) <u>where the Prioritisation Category of a Modification Proposal has been changed, this change should be reflected within the Modification Register alongside</u></p>

urgency removed and second suggestion amended

		details of and the reasons for theits change, "
Annex K STC proposed legal drafting		
STC paragraph 7 - Modification of the Code and Code Procedures	There is a typo in the proposed text change to STC paragraph 7.1.11.3 ("an" should read "and", as identified in red text opposite under "Mitigation"). Amended elsewhere	<u>"7.1.11.3 The Authority Led STC Modification Report shall be submitted to the Authority as soon after the Authority Led STC Modification Proposal is submitted for evaluation as is appropriate (taking into account the Prioritisation Criteria and whether the complexity, importance and urgency of the modification has been determined to be an Urgent STC Modification Proposal, ...".</u>
	There is a proposed text change to STC paragraph 7.1.11.4 which could be used as an opportunity to correct the typo that currently exists in this paragraph (replace ";" with "" as identified in red text opposite under "Mitigation"). Amended elsewhere	<u>"7.1.11.4 The Authority can require the revision and re-submission of the Authority Led STC Modification Report, such resubmission to be made, if required, by a direction issued by the Authority to the Panel in accordance with Paragraph 7.2.5.15, as soon after the Authority's direction as is appropriate (taking into account the Prioritisation Criteria and whether the complexity, importance and urgency of the modification has been determined to be an Urgent STC Modification Proposal, ...".</u>
	There appears to be a space missing from the proposed text change to STC paragraph 7.1.11.5 (between "of" and "the", as identified in red text opposite under "Mitigation"). This could be used as an opportunity also to correct the typo that currently exists in this paragraph ("effet" should read "effect", as	<u>"7.1.11.5 The timetable referred to in Paragraph 7.1.11.2(h) for implementation of any modification shall be in accordance with any direction(s) issued by the Authority, or where no such direction has been</u>

	<p>identified in red text opposite under "Mitigation").</p> <p>Amended elsewhere</p>	<p><u>issued by the Authority, the timetable shall be such as will enable the modification to take effect as soon as practicable after the Authority has directed that such modification should be made, account being taken of the Prioritisation Criteria and whether the complexity, importance and urgency of the modification has been determined to be an Urgent STC Modification Proposal,...</u>".</p>
<p>STC paragraph 7.2.3 - Modification Panel Amendment Meetings</p> <p>Not changing - unintended consequences</p>	<p>Proposed code text change inserted at STC Section B, Section 7.2, sub-paragraph 7.2.3.1(f) doesn't follow on from opening words in paragraph 7.2.3.1 and should be amended to appear as a separate paragraph.</p> <p>Paragraph 7.2.3.1(e) should be amended to remove "; and" and reinstate "." (as proposed in red text opposite under "Mitigation").</p>	<p>"7.2.3.1 Pursuant to sub-paragraph 7.2.2.4, the STC Modification Panel shall consider a STC Modification Proposal ... at the next STC Modification Panel Meeting, in accordance with and subject to the provisions of paragraph 6.3, and at such STC Modification Panel Meeting shall use all reasonable endeavours to decide (as and where relevant) whether:</p> <p>(e) the STC Modification Proposal satisfies the Self-Governance Criteria or not;and</p> <p>(f) wWhere the STC Modification Proposal has been determined not to be an Urgent STC Modification Proposal, <u>and having assessed the STC Modification Proposal against the Prioritisation Criteria, as compared with other STC Modification Proposals, taking into account the Proposer's opinion provided pursuant to Clause 7.2.2.2 (k), the Modification Proposal should be accorded a relevant Prioritisation Category."</u></p>

<p>STC paragraph 7.2.3 - Modification Panel Amendment Meetings</p> <p>Amended both</p>	<p>The proposed text change includes a new paragraph 7.2.3.5(d), as a consequence of which the position of "; and" should be moved from paragraph 7.2.3.5(b) to 7.2.3.5(c) (as proposed in red text opposite under "Mitigation").</p> <p>Under the proposed new paragraph 7.2.3.5(d), where STC Modification Proposals are amalgamated, the Panel shall determine the amalgamated STC Code Modification Proposal to have a single Prioritisation Category by considering the Prioritisation Categories accorded to them. This precludes the Panel from determining that the amalgamated STC Code Modification Proposal should be an Urgent STC Modification Proposal. <i>Is that the correct position?</i></p>	<p>"7.2.3.5 Where STC Modification Proposals are amalgamated pursuant to sub-paragraph 7.2.3.4: (b) references in this Section B to a STC Modification Proposal shall include and apply to a group of two or more STC Modification Proposals so amalgamated; and</p> <p>(c) the Proposers of each such amalgamated STC Modification Proposal shall co-operate in deciding which of them shall constitute the Proposer of such amalgamated STC Modification Proposal, failing which agreement, the STC Modification Proposals shall continue separately as before-; and"</p>
<p>Consultation document paragraph 4.10 - Prioritisation in modification registers and reports</p>	<p>Proposed code text has been inserted at STC sub-paragraph 7.2.7.3(f) which doesn't follow on from opening words in paragraph 7.2.7.3 and should be amended (as proposed in red text opposite under "Mitigation").</p>	<p>"7.2.7.3 The STC Modification Register shall record: (f) where the Prioritisation Category of an STC Modification Proposal has been is changed, this change should be reflected within the Modification Register alongside details of and the reasons for theits change change."</p>
<p>STC paragraph 7.2.8 - Monthly progress report</p>	<p>The proposed text change at paragraph 7.2.8.4 should be amended to reflect the alteration proposed to</p>	<p>"7.2.8.4 If, following discussion with the STC Modification Panel, the Authority issues a notice to the Panel Secretary requesting the STC</p>

	<p>paragraph 7.2.8.2(b) since the August 2025 decision publication (as identified in red text opposite under "Mitigation").</p> <p>Amended</p>	<p>Modification Panel: (b) to amend the timetable for a STC Modification Proposal or any Alternative STC Modification <u>(including the Prioritisation Category afforded to and between such STC Modification Pp</u>proposals); or Urgent STC Modification Proposal <u>(including the priority afforded to and between such proposals),"</u></p>
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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?	The consultation questions do not fully align with the corresponding sections in the document, which has led to confusion.
Do you have any comments about its tone and content?	The section on prioritisation categories and criteria could be presented in a more user-friendly way. A comparative table showing the 'As Is' versus the 'To Be' state would make it easier to understand, with changes in terminology - such as 'Priority' becoming 'Priority Category' - clearly highlighted.
Was it easy to read and understand? Or could it have been better written?	As noted above, the questions do not appear to align with the sections they reference. While we are experienced in navigating ECR consultations and can work through the inconsistencies, if the objective is to make the codes more accessible to all parties, the drafting of this consultation could have been clearer and easier to navigate.
Were its conclusions balanced?	

Did it make reasoned recommendations for improvement?	While the approach aligns with the code change prioritisation model, simplifying the categories may inadvertently make ranking more difficult. The process appears to be becoming more subjective rather than less, which could undermine the intended clarity and consistency.
Any further comments?	A standardised scoring system based on the ECR value drivers would help to streamline the process effectively across codes.

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

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

evaluate each response on its own merits without undermining your right to confidentiality.