
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

Contact name	Muhammad Madni
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Date of submission	12 th 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

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 Ofgem’s move to a harmonised prioritisation process across codes as set out in section 2. The emphasis should be on transparency, and the new process should ensure that amalgamated approach should reduce fragmentation in modifications which span across multiple codes.

We support the requirement for code amendment proposers to provide an initial assessment against the prioritisation criteria. We also support the requirement for the code panel making a final prioritisation determination giving due regard to the proposer’s assessment. We agree that urgent modifications should remain outside the prioritisation process as they serve urgent operational and compliance risks.

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

- **Agree**

Comments:

We support the adoption of common criteria. The three criteria i.e. Alignment with Strategic Direction Statement (SDS), Complexity and Importance provide a sound framework.

We note that this approach is embedded within the proposed changes in BSC, CUSC and Grid code.

The standard / high priority binary approach is simple but effective and should help avoid overcomplication due to too many categories.

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

- **Agree**

Comments:

We support the proposed reporting and governance arrangements and agree that a bi-annual review is better than the earlier proposed quarterly review. The requirement for parties (Code Administrators) to update the modification register will ensure better transparency. We note that, while modification registers are maintained by relevant Code Administrators, the content relating to prioritisation categories and determinations is derived from decisions taken by Code Panel members, and we consider this as an appropriate allocation of responsibilities within the governance framework.

We also support the ad hoc prioritisation review facility for the code panel members to cater to the new policy or regulatory developments. We note that Ofgem does not propose to introduce any new appeal process for prioritisation at this stage and existing governance and oversight arrangements are being retained including those in CUSC, Grid Code and BSC. In our view this mechanism should suffice for now and we welcome

Ofgem’s commitment to consult further if the new framework indicates need to additional appeal and /or escalation mechanism.

While the interpretation and application of prioritisation criteria rests with code panels, there may be value in Ofgem’s oversight of the early outcomes of prioritisation decisions across different codes during the initial implementation phase. This could help identify commonality and divergence on the application of criteria and support the sharing of learning and best practices across panels and build confidence in the consistent application of the framework.

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

- **Agree**

Comments:

We agree with the proposed approach to policy implementation set out in section 5 of the consultation on the application of the new prioritisation framework to both new and existing modifications. We consider it appropriate that a consistent prioritisation framework is applied from the point of implementation.

We support the exclusions set out in section 5.6, which we understand are designed to limit reassessment to those proposals that have yet not reached advanced decision stage.

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

- **Agree**

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

- **Agree**

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

- **Neither agree nor disagree**

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?	We welcome Ofgem's harmonised prioritisation process as part of energy code reform. This framework should provide a foundation for greater transparency in modification prioritisation, consistency of modification approach across codes with alignment with regulatory policy and Strategic Direction Statement (SDS).
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.