
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	Malcolm Montgomery
Role title	Market Change Manager
Company name	National Gas
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Date of submission	12/01/26
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?

- Agree

Comments: We agree that:

- New modifications should be given a Prioritisation categorisation.
- It shall be the role of Panel to make that decision.
- There is a role for the proposers of the Modification to make the case for a particular Prioritisation category.
- Prioritisation shall be distinct from Urgency.

However, we also think that explicit consideration should be given to how Fast Track Self-Governance mods interact with the Prioritisation process. These modifications are of a housekeeping nature and, while not urgent, they are implemented at the earliest opportunity given their inherent simplicity. For simplicity they could be excluded in a similar way to how Urgent mods are excluded.

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

- Agree

Comments: The prioritisation criteria are consistent with what is done in other codes where a precedent already exists, and we believe they are reasonable criteria to be considered.

A binary classification into high and standard is simple and appropriate.

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

- Disagree

Comments: Panels should be given more discretion on the appropriate frequency. We suggest a change from a fixed bi-annual basis to a minimum of annually. The minimum aspect also better aligns the legal text to the possibility (as per the guidance document) of holding ad-hoc assessments when appropriate.

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

- Disagree

Comments: We do not believe there is any urgent need to assign prioritisation categories to existing Modifications given they already have established timelines that are being adhered to. To ease administrative burden then a longer transition period should apply. This would allow many live Modifications to be given a priority status the next time they naturally go to Panel allowing for an efficient and smooth transition. This can be subject to a backstop e.g. 6 months.

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: 28 days should be achievable for new Modifications however as per the response to Q4 above. Individual Codes/Panels should be given longer to assess 'live' modifications.

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

- Agree

Comments: Notwithstanding points of improvement identified elsewhere in our response. We also would support Ofgem periodically reviewing and updating the document in response to experience of the process.

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

- Agree

Comments: Substantively agree, noting the following points:

- Amend ‘on a bi-annual basis’, to something to the effect of ‘*at least every 12 months*’ in UNC paragraph 12.13.1.
- 7.2.3(b)(v) should come up a bullet level. The sub-bullets in 7.2.3(b) are all about what *stage* the modification should proceed to next. A determination of a property of the modification (in this case - prioritisation category) does not fit in the sub-list in paragraph (b). This would adhere to the way that the Governance determination is written, it is a stand alone bullet 7.2.3(a), rather than being embedded as a sub-bullet within 7.2.3(b).
- Subject to policy agreement on the point raised in Q1, please consider appropriate amendments to explicitly cover the treatment of Fast Track Self Governance modifications, potentially by excluding them from the prioritisation requirements.

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

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