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## **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**

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<b>Date of submission</b>	<b>12/01/2026</b>
<b>Do you want your response treated as confidential?</b>  (If yes, please indicate whether you would like the whole of your response to be confidential, or just particular parts).	<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?

[Please delete all but one bullet]

- Strongly agree

Comments: We are supportive of harmonisation across all codes where it is fit for purpose. The harmonisation of the code manager approach to prioritisation is needed and we particularly support the strengthening of the role of the proposer of the modification in its prioritisation by being required to assess their proposal against the new harmonised prioritisation criteria.

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

[Please delete all but one bullet]

- Strongly agree

Comments: We agree codes currently do not have consistent methodologies, categories and criteria for prioritising modifications. Some codes are also not clear and transparent on their approach and decision making. This leads to segmented and different cultures from code managers/administrators. The absence of clear applicable criteria (e.g. SEC Change Sub-Committee) can result in burdensome resource intensive work by a proposer (e.g. SP ENW regarding [SEC Modification 293 Deferment of DCC Planned Maintenance during Adverse Weather – Smart Energy Code](#)).

Our SECMP 293 modification proposed solutions would directly impact and benefit customers during adverse weather (such as a named storm and during power outages). We are requesting DNOs can communicate with smart meters for power restoration management, during adverse weather including during DCC planned outage (maintenance and Business Disaster Recovery Testing) events.

We did not agree with SECAS/SEC Change Committee that the modification was self-governance, medium priority and non-urgent. We requested it should re-categorised as Authority lead, high priority and urgent.

We were required in November 2025 to present to the SEC Change Sub-Committee regarding our request to re-prioritise to high and Authority determined and to the SEC panel on re-prioritisation to urgent. In order to do this, we had to request transparency of how SECAS make a decision on prioritisation, to enable us to provide a fit for purpose business rationale for the re-categorisation. This information is not published on the SECAS website. Currently the status of our modification is:

- the SEC Change Sub-Committee did approve our request for high priority and Authority lead, but it was unnecessarily resource intensive for SP ENW as the proposer and a subjective approach. Whilst the SEC Modification Register now states the prioritisation has changed for SECMP293, there is no accompanying published reason for its change. In this regard, we welcome Ofgem’s proposals for increased transparency and clarity in the proposed legal texts to the codes (including the SEC) for a requirement to publish the reason for a change alongside the decision.

- The SEC Panel have delayed their decision if the modification is urgent dependent on the outcome of a DCC business requirement conclusion (expected early in 2026). We are disappointed the fastest timeline being proposed by SECAS even for an urgent modification (if approved) is 1.5- 2 years (another two storm seasons for customers) despite our requesting that this modification is treated as urgent due to the impact on customers. The business rationale for the lengthy timeline is due to:
  - 1 year for SEC governance pathway - with no discernible fast tracking compared to standard priority
  - 1 year for DCC design, build and testing

This SEC approach on urgency and high priority code changes appears at odds with Ofgem’s aspirations for comparable SDS ‘Act Now’ modifications to be implemented within one year. We would welcome Ofgem strengthening the legal text and guidance on treatment of urgent modifications which is unique to code modifications which have associated central system impacts. Currently, we are in danger of a two-tier approach – one for SDS Act Now ‘urgent’ modifications being on a faster track than slower bottom-up Code parties proposed urgent modifications. We request Ofgem revisit this and would welcome additional guidance to align with the SDS.

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

[Please delete all but one bullet]

- Strongly agree

Comments: We welcome and agree with the new prioritisation criteria to align with the SDS and that the new prioritisation process will apply to all modification proposals - including live modifications (such as our SP ENW SECMP293). However, we would welcome guidance from Ofgem to code managers how they will communicate their plans for retrospectively apply these reforms to applicable live modifications and communicate this with the proposers and all code parties. We would also recommend a

one-off policy implementation review needs to be conducted by the code manager/code change panels to identify which modification fall within the definition of live modifications and require a review and communication plan.

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

[Please delete all but one bullet]

- Disagree

Comments: Whilst we agree with the policy proposed for biannual reviews and publications of changes on the Code modification registers under Section 4 - we disagree with Ofgem's view that prioritisation category determinations do not require a new appeals process. The rationale for not including is based on stakeholders input at various stages. Whilst we welcome the new codified requirement for a proposer to complete a prioritisation assessment, we do not believe this would negate a code parties right to appeal a determination. In comparison with other code appeal pathways – code parties would be appealing the code managers/committees decision, rather than how they as a code party inputted. This is especially important with the disbandment of code panels and increasing of code manager decision making powers under code reform. We also note Ofgem refer to some codes (REC, BSC, CUSC, Grid Code and the STC) having an existing appeal route for overturning prioritisation determination. The DCUSA and SEC do not have this appeal routes and it would not support harmonisation and removing barriers on different code manager approaches.

We request this element of an appeal pathways is codified for those codes which currently do not have access to this appeals pathway. This would enable alignment with other code appeals pathways (e.g. decision on the modification) and on the grounds of fairness, harmonisation and precedent setting. The appeal pathway should be based on how the prioritisation criteria and if the appellant may agree or not with the code managers/committee's determination.

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

[Please delete all but one bullet]

- Strongly agree

Comments: We agree. Please refer to our response to Q3 we would welcome further Ofgem guidance how code managers will retrospectively review and apply the policy to live modifications.

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

[Please delete all but one bullet]

- Agree

Comments: On balance we agree. We would welcome further strengthening of the proposed guidance and have made recommendations in our response to Q2 -5 which is summarised as follows:

- inclusion of new guidance how non SDS code urgent modifications align with SDS Act code modifications timelines – (refer to our response to Q2)
- inclusion of new guidance how code managers will implement the policy for live modifications - (refer to our response to Q3)

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

[Please delete all but one bullet]

- Agree

Comments: On balance we agree. We would welcome further strengthening of the proposed legal text and have made recommendations in our response to Q2 -5 which is summarised as follows:

- inclusion of new legal text how non SDS code urgent modifications timelines are dealt with which impact central systems to ensure alignment with SDS Act Now policy – (refer to our response to Q2)
- inclusion of new appeal route legal text for prioritisation category determinations against new prioritisation criteria - (refer to our response to Q4) -

### 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?	no
Do you have any comments about its tone and content?	no
Was it easy to read and understand? Or could it have been better written?	no
Were its conclusions balanced?	yes
Did it make reasoned recommendations for improvement?	yes
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.