
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	Paul McKie
Role title	CEO
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Date of submission	06/01/2026
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:

The prioritisation process shows a reasonable approach to assessing the prioritisation of modifications through the involvement of both the proposer and code panels. The energy industry has varying approaches to assessing prioritisation, with some codes having no prioritisation approach at all (e.g. gas), therefore this process introduces consistency and alignment across all energy codes.

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

- **Neither agree nor disagree**

Comments:

We agree that alignment with the SDS will support the delivery of policy priorities, as will assessing the importance of a modification which will help prioritise changes that are critical to the industry. However, we believe that complexity would be hard to appraise at the point a modification is being assessed for priority, as commercial and system impacts would not be fully understood at that point along with other unknown factors. We believe that complexity should be taken into consideration for planning purposes to ensure deadlines, stakeholder engagement, length of implementation period, capacity management and the risk/impact of delays are all factored into planning rather than it being a prioritisation category.

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

- **Agree**

Comments:

A bi-annual review of prioritisation feels appropriate, allows time for modifications to develop as well as system and commercial impacts to be better understood. We also agree with the term 'Prioritisation Category' and that code panel's determinations on priority are published on the modification register, supporting and promoting transparency.

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

- **Strongly agree**

Comments:

The definition of what a live modification is, feels appropriate and would prevent potential rework for modifications that are awaiting a decision around implementation or

are awaiting implementation. We believe that sharing this approach with code panels ahead of the new prioritisation policy being implemented will help proposers and code panels become familiar with what will be expected, thus potentially reducing the number of modifications that would need to be resubmitted.

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

- **Agree**

Comments:

The proposed implementation date of 28 days from the publication of the related prioritisation policy decision notice is reasonable, assuming that there are no fundamental changes to the proposed process following consultation.

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

- **Neither agree nor disagree**

Comments:

We support the proposed guidance on code modification prioritisation document and agree that it will help code parties when applying the priority categories. In **figure 1 – Prioritisation within the code modification process** it shows stages 4 to 7 being impacted by priority category determinations; however, we also believe that *stage 3. Assessment of modification proposals* will be impacted by prioritisation category determinations. We would also like to reiterate our point above (Q2) about complexity being a consideration for planning rather than a priority category.

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

- **Agree**

Comments: We agree with the proposed code text drafting published in Annex L: Uniform Network Code (UNC).

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?	Yes
Were its conclusions balanced?	Yes
Did it make reasoned recommendations for improvement?	Yes
Any further comments?	<p>Encodar is the organisation created to operate the Joint Office of Gas Transporters (JO) on behalf of the Gas Transporters (GTs). The team provide impartial guidance and advice for the development and governance of Uniform Network Code (UNC) modifications along with delivery of industry working groups, committees and the Modification Panel.</p> <p>The UNC governance requirements are delivered on behalf of the GTs in accordance with their Licence requirements of Standard Special Condition A12 with the Joint Office (JO) arrangements having been in place since 2005.</p> <p>The JO is responding to the above consultation from a gas perspective only, in our capacity as the incumbent Code Administrator.</p>

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.