
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	Kevin Woollard
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Date of submission	12th 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?

- Disagree

Comments:

While we agree that there will be benefits in harmonising the modification prioritisation process across all codes, we believe that an additional step to allow Proposers formally to appeal code panel decisions should be introduced within the process. There should be a clear and transparent process for Proposers to appeal decisions made by the code panel and clear guidance should be defined to detail appeal criteria. This will ensure that determinations are made fairly and are aligned with industry benefits. All inputs and outcomes to prioritisation decisions should be made transparent, including for appeal processes. We suggest this because where prioritisation currently takes place, lobbying activity by industry parties has historically taken place to gain favour with Panel decisions without input of other parties.

The future role of the Code Manager in prioritisation processes and decisions appears to be absent, with reference only to Panels, which would make this purely a transitional proposal rather than enduring – whereas in the introduction to the consultation Ofgem suggests that it will only consult further on further changes if it decides that this will be necessary). This is especially important in circumstances where the Code Manager proposes changes itself and would then be prioritising its own changes against others. In this circumstance, provision for appeal by other proposers, SAF or industry more widely – or intervention by Ofgem – should be allowed for. In our view, further work is definitely required in this area to ensure that independence and transparency are preserved.

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

- Disagree

Comments

The proposed triage criteria require additional definition to ensure transparency and avoid misinterpretation. Code managers should have clear guidelines and criteria to follow when assessing modification proposals. The REC utilises a prioritisation matrix which enables the code body to complete an assessment against the criteria based on the impacts, significance, urgency and effort/complexity of the modification. (As highlighted in the example below). Implementing a similar matrix ensures transparency within the triage process and supports when determining the timescales for progression. This will help in maintaining consistency and avoiding potential biases.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	2	27	53
	Retail Markets Impact	Innovation and Market Arrangements	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		2	9	18
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		1		8
Urgency <i>(The need to progress a change to meet a targeted date)</i>		Other Planned Activity	2	10	20
Overall Priority Score (rounded)					167

Priority Status	HIGH
Change Proposal Type	STANDARD

Having a similar prioritisation matrix included within the guidance would assist panels when trying to compare the merits of different changes against each other.

Currently, under some codes, including the REC and the BSC, arrangements are in place to allow certain technical documents or low risk configurable items to be changed without going through a formal modification process. We would expect this to continue under any new arrangements for these types of minimal and housekeeping change activities to progress without the need to be assessed against the priority criteria.

We disagree that the prioritisation criteria are given equal weighting. We believe that the “Alignment with the SDS” and “Importance” should have higher weighting than “Complexity”. Whilst a modification could need a high level of industry resources or need complex system change or cross code changes, these should be second order to the assessment against the “Alignment with the SDS” and “Importance” criteria.

It's unclear whether “Complexity” would raise or lower a modification’s priority against others. For example, it could be interpreted that a difficult change requiring a lot of industry input should be dropped down the list to let other changes progress, or it could be interpreted that it needs to be brought up the list as it needs more development time. We have previously questioned “complexity” as a criteria for this reason.

We also previously questioned the use of SDS alignment and the need for refinement in decision making for this criterion. The SDS is a forward-looking document which presents at least two concerns: firstly, it may not have foreseen and include areas which become essential for change to progress and be prioritised within the coming year; secondly, to counter this possibility, Ofgem may make the SDS so vague and open to interpretation that any change could be said to align to the SDS, allowing this criterion to be used spuriously. We welcome some more considered thoughts from Ofgem on how the SDS and this criterion will function in reality. Our previous comments at Q1 on transparency and ability to appeal decisions are also relevant here.

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

- Strongly disagree

Comments:

We strongly disagree that no new appeals processes are being added specifically for prioritisation category determinations. Whilst some codes, such as the REC, allow Ofgem to overturn a code manager’s prioritisation determination if it considers it necessary or following a code party’s appeal, we do not believe the other codes give any ability for Proposers to appeal a priority category determination. Whilst Ofgem might have an oversight role where it can determine prioritisation, this is not the same as giving Proposer’s the right to appeal.

It is also unclear from these proposals what role the Stakeholder Advisory Forums (SAF) will have in the prioritisation process when code managers are in place. We firmly believe that SAFs should have a formal role in the prioritisation process, and where the SAF disagrees with a code manager decision, parties should be able to appeal that decision. As mentioned above at Q1, it’s clear to us that additional work and consultation is needed to address this, despite Ofgem’s comments in the introduction that this would be contingent on your future assessment.

We agree with the proposal for Code Panels to carry out bi-annual and ad hoc reviews of the prioritisation category of modification proposals. We also agree with the proposal to codify the requirement for relevant parties to update modification registers with details of prioritisation and urgency assessments, to maximise transparency of the process.

We also believe that it is important to ensure there is a consistent application of prioritisation criteria across different codes, as there could be the potential for varied interpretations. Ofgem should consider putting in place monitoring or oversight mechanisms to ensure consistency across the codes.

Further work is required to ensure modification registers are standardised (where possible) across the codes. As well as standardisation, there should be some requirements regarding the digitalisation to ensure improved and standardised accessibility. As an example, DCUSA and REC both have an easily accessible dashboard within their websites, but the BSC does not have this functionality, (signatories? currently have to download an excel spreadsheet with no regularity on when this is updated (supposed to be weekly according to website).

Code reform should be used as an opportunity to ensure Code Managers are obligated to update these more frequently and standardise the publication/access methods. This will also make it easier for new participants looking to enter the market. There also needs to be a central modification register which participants can access to get a view of ALL code modifications. Again, this will help with accessibility and smaller scale industry participants to navigate the different codes. Ideally this should be updated daily with access provided via an API similar to arrangements that have recently been introduced into the DCUSA.

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

- Agree

Comments:

We agree with the proposals outlined the Policy implementation section of the consultation.

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

- Disagree

Comments:

We do not believe 28 days is sufficient time to allow Code Panels to effectively implement the new arrangements. Panels typically meet monthly – therefore, to ensure sufficient time is given for prioritisation of “live” modifications (where further

engagement with Proposers may be required), we think three months should be provided. Panels need to cover their important existing work in addition to this requirement.

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

- Agree

Comments:

Notwithstanding our above comments relating to appeals, the role of SAFs , criteria weighting, the use of a priority matrix, monitoring of panel decisions to ensure consistency and providing a longer implementation timescale - which if adopted should all be reflected in ‘Annex A’ guidance, we agree with the proposed guidance in ‘Annex A’.

Page 10 of Annex A provides guidance for Code Panels when assigning the prioritisation status to a modification. This guidance is a positive step in removing ambiguity around the assessment criteria, however we think there is still room for misinterpretation, particularly for the "importance" criterion.

"If a modification is expected to deliver significant value or addresses a high-risk or critical issue for stakeholders, it is likely to be prioritised as high priority rather than standard priority."

The above guidance still leaves room for different interpretations of what "significant value" means. The guidance states that all categories should be given equal weighting, so it is difficult to see how a balanced assessment can take place without clearer guidance on the importance of the modification.

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

- Agree

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?	This consultation is being undertaken before certain other policy decisions such as the make up and role of SAFs has been determined. Therefore, we have had to assume that certain processes and procedures that will be imposed on Code Panels will also be carried across to Code Managers with some input from SAFs (as yet unknown).
Do you have any comments about its tone and content?	No comment
Was it easy to read and understand? Or could it have been better written?	The consultation questions all have the wrong section references in them. As an example " Question 1: Do you agree with the policy and associated code modifications proposed in Section 1. Prioritisation process?" Prioritisation process is Section 2.
Were its conclusions balanced?	No comment
Did it make reasoned recommendations for improvement?	No comment
Any further comments?	No comment

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.