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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**

<b>Contact name</b>	<b>Victoria Burkett</b>
<b>Role title</b>	<b>Regulatory Compliance Manager</b>

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<b>Company name</b>	<b>E.ON and nPower Commercial Gas Ltd. TA nPower Business Solutions.</b>
<b>Telephone number</b>	
<b>Email address</b>	<b>victoria.burkett@eonnex.com</b>
<b>Date of submission</b>	<b>12 January 2026</b>
<b>Do you want your response treated as confidential?</b>  <b>(If yes, please indicate whether you would like the whole of your response to be confidential, or just particular parts).</b>	<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?

- Agree

Comments: We agree with what has been proposed.

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

- Agree

Comments: We agree with what has been proposed. We would welcome explicit confirmation that the application of the prioritisation criteria, reporting expectations and governance processes will be applied in a proportionate manner, taking account of the scale, complexity and resourcing of different code parties, including IDNOs.

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

- Agree
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Comments: We agree with what has been proposed.

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

- Agree

Comments: We agree with what has been proposed however we would like to note that the SQSS still refers to a quarterly review. We have not identified any indication as to why this discrepancy exists.

**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: It is not clear whether changes will need to have been reassessed by the proposed implementation date or whether the implementation will take effect and the code managers are able to assess live changes after implementation. We believe this will need to be clarified.

We also believe that a review of all existing change proposals should be completed to enable Code Managers to determine the impact on this implementation date. We propose the following should be considered -

- Review any proposals which have not progressed and consider withdrawal
- Amalgamate any changes which impact the same processes, this is likely to require amendments to the problem statements
- Provide each party with a consolidated list of open changes once the review is completed

It is likely that parties maintain their own internal change registers therefore, it would be extremely beneficial for any updates made to be shared with industry.

Absent this clarity, there is a risk of inconsistent treatment of proposals across codes during the transition period, which may disadvantage parties that do not have dedicated code governance teams.

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

- Agree

Comments: We agree with what has been proposed.

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

- Agree

Comments:

Annex H -

Clause 4.6 (b) the reasons for the Code Manager’s determinations where they have been made in regard to the Prioritisation Category of **each** Issue or Change Proposals. Changed

Clause 4.6 (c) where the Prioritisation Category of an Issue or Change Proposal is changed, this change should be reflected within the Change Register alongside the reasons for its **change-amendment**. Changed elsewhere

Clause 9.5A - Where an Issue or Change Proposal has been determined to not be an Urgent Issue or Change Proposal, the Code Manager shall make the determination of the Prioritisation Category of the Issue or Change Proposal, by assessing it against the Prioritisation Criteria as compared with other Issues or Change Proposals,.. changed

Annex K -

Clause 7.1.11.3 *The Authority Led STC Modification Report shall be submitted to the Authority as soon after the Authority Led STC Modification Proposal is submitted for evaluation as is appropriate (taking into account the Prioritisation Criteria and **d** whether..* changed

Clause 7.1.11.4 *The Authority can require the revision and re-submission of the Authority Led STC Modification Report, such resubmission to be made, if required, by a direction issued by the Authority to the Panel in accordance with Paragraph 7.2.5.15, as soon after the Authority’s direction...* changed

Clause 7.1.11.5 *The timetable referred to in Paragraph 7.1.11.2(h) for implementation of any modification shall be in accordance with any direction(s) issued by the Authority, or where no such direction has been issued by the Authority, the timetable shall be such as will enable the modification to take effect **c** as soon as practicable after the Authority has directed that such modification should be made, account being taken of **the**..*

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Annex L -

Clause 6.2.1. (c) shall state the Proposer's view as to ~~(i) whether it should be a Self-Governance Modification Proposal and the Proposer's reasons for such a view;~~ ~~(ii) shall state the Proposer's view as to whether, if the Proposer's view is that it should be a Self-Governance Modification~~ it satisfies the Fast Track Self-Governance Criteria ~~and the Proposer's reasons for such a view~~

CHanged both

Clause 7.2.2 (h) remove additional 'or'

**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?	
	We believe Ofgem should be cognizant of the impact on industry, given that parties will be undergoing a significant migration for the Market-wide Half-Hourly Settlement (MHHS) until Milestone 15 (M15). While we acknowledge the need to consolidate codes and implement this programme, we would appreciate it if Ofgem would consider the burden of requests

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Any further comments?	<p>for significant documentation reviews and avoid scheduling them during critical phases of the MHHS migration. Failure to do so may negatively affect parties' capacity to provide substantive responses to such requests.</p> <p>EON's Independent Distribution Network Operator (IDNO), supports the objectives of the harmonised prioritisation process, particularly increased transparency, consistency and predictability across codes. However, it is important that the implementation of this framework recognises the resourcing constraints and operational scale of smaller network operators, relative to larger incumbents.</p>
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**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

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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.

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