
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	Jim Cardwell
Role title	Head of Energy Systems Policy
Company name	Northern Powergrid
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Date of submission	12/1/26
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

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

- Agree

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

- Agree

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

- Agree

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

- Agree

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

- Agree

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

- Disagree

Comments:

We have some proposed changes to the legal drafting. These are important points of detail that we believe give better effect to Ofgem’s intended outcome.

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

BALANCING AND SETTLEMENT CODE

1.3.3 The Modification Register shall record in respect of current outstanding Modification Business:

- (c) where the Prioritisation Category of a Modification is changed, confirmation of the change alongside the reasons for the change.

changed

This change makes paragraph (c) work grammatically.

1.4.2 The Monthly Progress Report shall contain:

- (c) details of:
 - (i) where the Modification has been determined to not be an Urgent Modification Proposal, the Prioritisation Category which the Panel is proposing to accord or is according to the Modification Proposals contained in the Modification Register (in accordance with paragraph 2.2.3), including the reasons for the Panel's proposal;

If it says "determination", the reasons would be why the Modification has been determined to not be an Urgent Modification Proposal. If the reasons are meant to relate to the Prioritisation Category which the Panel is proposing, it should say "proposal".

2.2.3 In relation to each new Modification Proposal, the Panel shall determine:

- (c) where the Modification Proposal is to be submitted to the Definition Procedure or the Assessment Procedure pursuant to paragraph (b):
 - (ii) subject to (a) paragraphs 2.2.8 and 2.2.9; (b) taking into account the assessment made under paragraph 2.1.2(m); and (c) the Panel having already determined that a Modification Proposal is not to be considered as an Urgent Modification Proposal, the Prioritisation Category accorded to the Modification Proposal (as compared with other Pending Modification Proposals) and the timetable to apply for completion of the relevant procedure; and

2.23(d) where the Modification Proposal is to proceed directly to the Report Phase pursuant to paragraph (b):

- (iv) subject to (a) taking into account the assessment made under paragraph 2.1.2(m); and (b) the Panel having already determined that a Modification Proposal is not to be considered as an Urgent Modification Proposal, the Prioritisation Category accorded to the Modification Proposal (as compared with other Pending Modification Proposals).

Removing the additional "subject to" references and adding the letters makes the above two clauses clearer.

CONNECTION AND USE OF SYSTEM CODE

8.13.3 The CUSC Modification Register shall record in respect of current outstanding CUSC Modifications Panel business:

- (c) where the Prioritisation Category of a CUSC Modification Proposal is changed, confirmation of the change alongside the reasons for the change.

This change makes paragraph (c) work grammatically.

Changed

DISTRIBUTION CODE

21

- (1) where the Prioritisation Category of a proposed modification is changed, this change should be reflected within the Distribution Code Modification Register alongside the reasons for its change. No change to avoid unintended consequence

This paragraph (numbered 1) comes between paragraphs 21(a) and 21(b) so should this paragraph be numbered 21(b) and the subsequent paragraphs re-numbered accordingly?

- 21(e) ... The consultation paper shall include an assessment by the proposer of the proposed modification against the Prioritisation Criteria. The consultation paper shall also include the Panel's assessment of the proposed modification against the Prioritisation Criteria, as compared with other proposed modifications, to determine the Prioritisation Category of the proposed modification, where the proposed modification has been determined to not be an urgent modification. This assessment by the Panel must take into account any assessment made by the proposer of the proposed modification against the Prioritisation Criteria ...

Capitalisation of "Panel" for consistency. Changed

- 25.1 The Panel shall review the Prioritisation Category of proposed modifications on a bi-annual basis and adjust the relevant modification timetable for each proposed modification accordingly.

Reference should just be to "Panel". Changed

STANDARD PROCEDURE 1

Governance of Qualifying Standards

4. STANDARDS GOVERNANCE PROCEDURE

4.1 Annex 1 Standards and Annex 2 Standards

- (1) where the Prioritisation Category of a proposed Annex 1 Standards and Annex 2 Standards modification is changed, this change should be reflected within the Annex 1 Standards and Annex 2 Standards Modification Register alongside the reasons for its change.

This paragraph (numbered 1) comes between paragraphs (vi) and (vii) so should this paragraph be numbered (vii) and the subsequent paragraphs re-numbered accordingly?

Not changed to avoid unintended consequences

DISTRIBUTION CONNECTION AND USE OF SYSTEM AGREEMENT

11.26 The Change Register shall contain, in respect of each Change Proposal that is in the Assessment Process:

11.26.3 whether the proposal is an Urgent Change Proposal or the Prioritisation Category of the Change Proposal, where this has been determined, and details of the assessment undertaken in paragraph 10.12.2, where this is made; [No change to avoid unintended consequences](#)

(a) where the Prioritisation Category of a Change Proposal is changed, confirmation of the change should be reflected within the Change Register alongside the reasons for the change.

[This paragraph \(numbered \(a\)\) comes between paragraphs \(11.26.3\) and \(11.26.4\) so should this paragraph be numbered \(11.26.4\) and the subsequent paragraphs re-numbered accordingly?](#)

[This change makes paragraph \(a\) work grammatically.](#)

GRID CODE

GR.13.3 The Grid Code Modification Register shall record in respect of current outstanding Grid Code Review Panel business:

- (e) such other matters as the Grid Code Review Panel may consider appropriate from time to time to achieve the purpose of GR.13.2;
- (f) where such Grid Code Modification Proposal has been determined not to be an Urgent Modification, the Prioritisation Category accorded to the Grid Code Modification Proposal, and details of the assessment of each Grid Code Modification Proposal against the Prioritisation Criteria carried out in GR18.10; and
- (g) where the Prioritisation Category of a Grid Code Modification Proposal is changed, confirmation of the change alongside the reasons for the change.

This change makes paragraph (g) work grammatically and, as paragraph (g) is last in the list, “and” should be after paragraph (f).

GR.15.3 A Grid Code Modification Proposal shall be submitted in writing to the Panel Secretary and, subject to the provisions of GR.15.4 below, shall contain the following information in relation to such proposal:

- (j) where possible, an indication of the impact of the proposed modification on relevant computer systems and processes used by Users;

Change because paragraph (j) is not last in the list.

GR.19.4 Without prejudice to each Proposer’s right to withdraw their Grid Code Modification Proposal prior to the amalgamation of their Grid Code Modification Proposal where Grid Code Modification Proposals are amalgamated pursuant to GR.19.3:

- (d) the Grid Code Review Panel shall determine the amalgamated Grid Code Modification Proposal to have a single Prioritisation Category by considering the Prioritisation Categories accorded to them (and the relevant assessments undertaken in determining these Prioritisation Categories), and determining an appropriate amalgamated Prioritisation Category.

Reference should be to “Grid Code Review Panel”.

GR.22.2 The matters to be included in a Grid Code Modification Report shall be the following (in respect of the Grid Code Modification Proposal):

- (g) an assessment of:
 - (vii) where such Grid Code Modification Proposal has been determined not to be an Urgent Modification, each Grid Code Modification Proposal against the Prioritisation Criteria, to determine its Prioritisation Category, in accordance with paragraph GR18.10;

Paragraph (g) starts with “an assessment of” so there is no need to say “details of the assessment of” in paragraph (vii).

GR.23.2(a) The Panel Chairperson shall determine the time by which, in their opinion, a decision of the Grid Code Review Panel is required in relation to such matters, having regard to the degree of urgency in all circumstances, and references in this GR.23.1 to the procedure – Grid Code.

Reference should be to “Grid Code Review Panel”.

All changed

RETAIL ENERGY CODE

4.6. The Code Manager shall publish

- (a) Whether each Issue or Change Proposal has been determined to be an Urgent Issue or Change Proposal, or, where each Proposal has been determined to not be an Urgent Issue or Change Proposal, its Prioritisation Category;
- (b) The reasons for the Code Manager's determinations where they have been made in regard to the Prioritisation Category of Urgent Issue or Change Proposals; and
- (c) where the Prioritisation Category of an Issue or Change Proposal is changed, confirmation of the change alongside the reasons for the change

Reference in paragraph (b) should be to "Urgent Issue", paragraph (c) is last in the list so move "and" to paragraph (b) and the change to paragraph (c) makes it work grammatically.

Other parts changed

Smart Energy Code

D1.9 The Modification Register shall contain, in respect of each Draft Proposal submitted pursuant to this Section D1 and Modification Proposal subsequently raised pursuant to Section D3:

- (v) where the Prioritisation Category of a Modification Proposal is changed, confirmation of the change alongside the reasons for the change;

The change to paragraph (v) makes it work grammatically.